

POLICY

Integrated Management System

INTEGRATED MANAGEMENT SYSTEM POLICY

Document Reference | PL03

Revision Record:

Version Number	Creation	Approval	Reason
15	Compliance Officer	Leadership	Integration of PL23 and PL31
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1. References	ISO/IEC 27001:2022 4.1, 5, A.5.1 ISO/IEC 20000-1:2018 5.1, 5.2, 8.7.3., 6.3.(c) ISO 9001:2015 4; 5.2 ETSI EN 319 411-1 ETSI EN 319 411-2 ETSI EN 319 421 ETSI EN 319 401 Regulation (EU) No. 910/2014 General Data Protection Regulation (Regulation 2016/679 of the European Parliament and of the Council) Law 58/2019, of 8 August - Data Protection
2. Associated Documents	PL05_SGSI – Acceptable usage (in Portuguese language) PL22_SGSI – Privacy and Personal Data Protection Policy PL10_GTS – Privacy Policy PL24 - Continuous Improvement Policy PC08 - Communication Process PC34_SGS - Service Portfolio Management Process DS24 – Definition of the scope of the IMS (in Portuguese language) DS43 - Strategic Plan DS27 - RACI Matrix – Roles and Responsibilities DS75 - Roles and Responsibilities Manual RG09_SGSI - Statement of Applicability
3. Associated Registers	RG01 – Document registration (in Portuguese language) RG06 - Legal and Contractual Requirements Table MA04_GTS - Document registration (in Portuguese language)
4. Distribution List	Public
5. Document History	2013-10-07 Version 1 2014-02-04 Version 2 2015-01-12 Version 3 2015-05-26 Version 4 2016-12-29 Version 5 2017-11-02 Version 6 2019-11-25 Version 7 2021-01-26 Version 8 2022-09-07 Version 9 2023-07-07 Version 10 2023-10-25 Version 11 2024-01-26 Version 12 2024-08-28 Version 13 2025-09-18 Version 14 2026-02-03 Version 15
6. Document Classification	D Public

7. Strategic Framework

ACIN – iCloud Solutions, Lda (ACIN) carries out its activities in a context of sustained growth, operating in increasingly demanding and regulated markets, where service quality, effective service level management, and information security are critical factors for differentiation, credibility, and trust.

Within this framework, ACIN establishes and maintains an Integrated Management System (IMS) as a strategic governance tool, ensuring coherent and consistent management of quality, service

delivery, and information security, in alignment with the organization's strategic objectives and the expectations of interested parties.

The organization is committed to providing adequate human, technological, and organizational resources, promoting the continuous improvement of the effectiveness and efficiency of its processes and management systems.

These commitments are materialized through the establishment of the RG20 service portfolio, in accordance with PC34, and the definition of the associated service levels. In turn, these service levels correspond to the identification of contractual or legal requirements formally agreed with relevant third parties, namely customers and other entities.

8. Motivation and Guiding Principles

ACIN's activities are subject to national and international legal, regulatory, normative, and contractual requirements, particularly in the areas of quality, service management, information security, and personal data protection.

Within this context, ACIN adopts the following fundamental principles:

- Strict compliance with all applicable legal, regulatory, normative, and contractual requirements;
- Systematic integration of legislative and regulatory developments into its management systems;
- Protection of information entrusted to its custody as a critical asset for business continuity;
- Customer satisfaction and loyalty through the provision of high-quality and reliable services.

9. Integrated Management System Objectives

This policy expresses ACIN's Leadership commitment to:

- Ensure the quality of customer service and the services provided, promoting responsiveness, effectiveness, and professionalism;
- Guarantee compliance with the service levels agreed with customers and other interested parties;
- Protect the confidentiality, integrity, and availability of information, including personal data;
- Monitor customer satisfaction and promote continuous improvement actions;
- Ensure the effectiveness, suitability, and continuous improvement of the Integrated Management System.

Within the same scope, this policy establishes the strategic and quality objectives, highlighting ACIN's leadership commitment to comply with and enforce the requirements applicable to the services provided and to the management systems, namely:

- Maintain high standards of customer service quality, ensuring the effectiveness and reliability of telephone and face-to-face support, prompt response times, timely return of missed calls, and the efficiency of the assistance provided;
- Manage and continuously improve the management systems, ensuring the performance of internal audits, management reviews, and follow-up actions, as planned and defined in the

applicable Integrated Management System documentation, as well as the systematic treatment of all corrective and improvement actions necessary for its effective performance;

- Continuously assess customer satisfaction through service evaluation surveys, with the objective of achieving and maintaining a minimum overall average rating of 4.5;
- Ensure the adequacy of human resources by promoting new hires whenever operational or strategic needs are identified;
- Invest sustainably in the continuous improvement of ACIN, as well as its products and services, promoting innovation, efficiency, and value creation for interested parties.

10. Scope of the Integrated Management System

The Integrated Management System (IMS) of ACIN – iCloud Solutions, Lda (ACIN) is designed in accordance with the scope related to the provision of management, development, operation, and support services for technological and application platforms, as well as the associated products and services made available to its customers.

The IMS coherently and complementarily integrates the following domains:

- Quality Management;
- Service Management, including the definition, monitoring, and compliance with service levels that support service delivery, in accordance with ACIN's service catalog;
- Information Security, ensuring the protection of the confidentiality, integrity, and availability of information, including personal data, throughout the entire service lifecycle, in accordance with the current Statement of Applicability – RG09.

The scope of the IMS considers the organization's internal activities, the human and technological resources involved, as well as subcontracted entities that contribute to service provision, in compliance with applicable legal, regulatory, and contractual requirements.

The detailed scope, including any justified exclusions, is formally defined in document DS24 – IMS Scope Definition, which constitutes a mandatory reference for the application and maintenance of the Integrated Management System.

11. Commitment and Values

ACIN adopts a professional approach based on the following values:

- Ensure quality, reliability, and effectiveness in service delivery;
- Promote customer orientation and customer satisfaction;
- Guarantee confidentiality, professional secrecy, and information protection;
- Promote honesty, ethics, and respect for assumed commitments;
- Continuously invest in the development, training, and empowerment of employees;
- Promote continuous improvement and innovation.

12. Risk Management and Risk-Based Thinking

ACIN is committed to identifying, analyzing, evaluating, and treating the risks associated with its activities, services, and information assets, adopting a risk-based thinking approach.

Risk management is carried out in accordance with a methodology defined by the organization, aligned with recognized best practices and international reference standards, and constitutes an essential tool to support management and decision-making.

13. Incident Management and Business Continuity

ACIN is committed to treating as incidents all events that may compromise service quality, compliance with service levels, or information security. Such events are recorded, analyzed, and handled in accordance with defined processes.

ACIN ensures the implementation of incident response and business continuity measures, guaranteeing a controlled and effective recovery from disruptive situations, in alignment with the defined service and security requirements.

Whenever situations of willful misconduct or non-compliance with responsibilities are identified, the applicable disciplinary and legal mechanisms may be triggered.

14. Complementary Policies, Communication, and Incident Management

ACIN – iCloud Solutions, Lda (ACIN) defines and maintains complementary policies whenever necessary to ensure the effectiveness of the Integrated Management System and the appropriate treatment of identified risks, ensuring their approval by Leadership and alignment with the organization's strategic objectives.

The communication and dissemination of Leadership decisions, as well as relevant policies and guidelines of the Integrated Management System, are ensured through the defined communication mechanisms, promoting the involvement and shared responsibility of employees and, where applicable, subcontracted entities, based on duly formalized agreements.

All events that may compromise service quality, compliance with service levels, or information security are treated as incidents and are subject to analysis and handling in accordance with best practices, ensuring the protection of the interests of the organization, its customers, and other interested parties.

15. Integration of the Management System, Complementary Policies, and Responsibilities

ACIN – iCloud Solutions, Lda (ACIN) ensures an Integrated Management System approach, guaranteeing coherent alignment between quality management, service delivery management, and information security management, regardless of the management systems implemented. The different domains are managed in an articulated manner, ensuring that matters related to quality, service levels, and information security are addressed in an integrated and consistent way, with a view to the continuous evolution of the system.

Whenever necessary to ensure the effectiveness of the Integrated Management System, ACIN may define complementary or thematic policies, approved by Leadership, to support the application of strategic guidelines and applicable requirements.

ACIN's Leadership assumes responsibility for the implementation, maintenance, review, and continuous improvement of the Integrated Management System, appointing those responsible for its coordination and the process owners required to ensure the system's effectiveness. The respective roles and responsibilities are formally defined.

This assignment is reflected in document DS27 – RACI Matrix, as well as in DS75 – Roles and Responsibilities Manual.

16. Training, Resources, and Effectiveness of the Integrated Management System

ACIN – iCloud Solutions, Lda (ACIN) is committed to ensuring that employee competence and awareness are critical factors for the effectiveness of the Integrated Management System. To this end, the organization commits to promoting regular awareness, training, and education activities in the areas of quality, service management, and information security, integrated into an annual training plan, whose effectiveness is periodically evaluated.

ACIN's Leadership also commits to providing the human, technical, and organizational resources necessary for the implementation, maintenance, and continuous improvement of the Integrated Management System, ensuring that these resources are adequate to meet applicable normative requirements, the service portfolio, and the organization's strategic objectives.

ACIN further ensures an integrated management system approach by aligning and coordinating quality management, service management, and information security management systems, in order to promote effective performance monitoring, process coherence, and the sustained evolution of the integrated system.

17. Communication, Dissemination, and Publication

ACIN – iCloud Solutions, Lda (ACIN) ensures the dissemination, communication, and publication of Leadership decisions, as well as the relevant policies, guidelines, and documentation of the Integrated Management System, through the defined internal communication processes, ensuring that appropriate information is conveyed to interested parties whenever justified.

The internal publication of documentation relevant to the operation of the Integrated Management System is considered essential to promote shared responsibility among employees, ensuring compliance with and effective application of quality, service management, and information security requirements, as well as supporting the training and awareness activities included in the annual Training Plan.

ACIN is committed to promoting continuous awareness, training, and education of its employees in matters related to the implemented management systems, ensuring their competence and awareness of applicable requirements. Where relevant, subcontracted entities are also included in appropriate actions, and the dissemination of policies and practices to these entities is promoted based on duly formalized agreements.

ACIN's Leadership further commits to communicating appropriately with all interested parties whenever relevant situations so require, in accordance with the defined communication processes.

18. Commitment to Review and Continuous Improvement

ACIN's Leadership is committed to ensuring the periodic review of the Integrated Management System, at least once a year or whenever significant changes occur, guaranteeing its suitability, effectiveness, and alignment with the organization's strategic objectives.

This commitment is based on a systematic approach to continuous improvement, ensuring the sustained development of the organization, its services, and its management systems.

18.1. Document Review

At least once a year, or when applicable, this policy shall be reviewed, as well as its applicability.

19. Roles and Responsibilities

ACIN's Leadership assumes responsibility for the implementation, maintenance, review, and continuous improvement of the Integrated Management System, appointing those responsible for its coordination and the process owners necessary for its effectiveness.

This assignment is represented in document DS27 – RACI Matrix.

Roles and responsibilities are formally defined in the applicable internal documentation.

20. Organization Context

ACIN has identified the following external and internal issues that it considers relevant to achieving the expected results and objectives, as reflected in document DS24 – Scope Definition. These external and internal issues are considered in the planning, implementation, and continuous improvement of the Integrated Management System, ensuring its suitability to the organizational context and the expectations of interested parties.