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# High Level System Management Policy


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## 1 Purpose of the document and Applicability

Scope of this document is to provide direct access to the General Policy that regulates the Systems managed by DOXEE S.p.a. and to highlights connections with the single System specific policy.

The document binding and applies to Doxee's Affiliated Companies:

- DOXEE Slovak s. r. o.
- DOXEE Czech s.r.o.
- BABELEEE S.R.L.

The Management of Affiliated Companies is responsible to:


- drive implementation and adherence to this policy,
- establish the adequate rules, standard and guidelines framework adapted to local/specific needs and regulations.

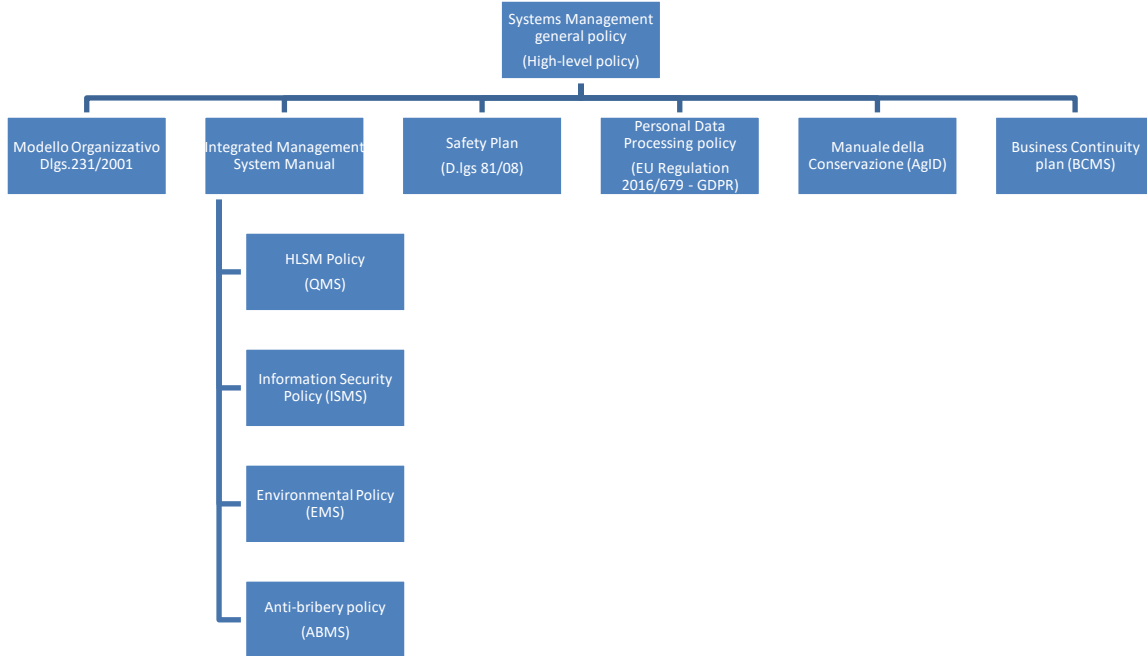
The contents should be available to all Doxee and Affiliated Companies Personnel. Employees' clear understading of the Systems in scope enables their proper and valuable application.


The Company Mission/Vision and the High level policy provide the principles on which single policies are built for regulating the Systems managed by DOXEE S.p.a. Specific policies direct the organization toward the achievement of the System objectives.

Detailed policies defined for every managed System are included in the relative System documentation.

The following image represents the structure of the Doxee's Systems Management Policies in place.

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## 2 General Policy for Systems Management

Doxee is a strategic partner for the design, implementation and delivery of customer communication and dematerialization services.

Through a service oriented culture and over ten years of experience working with our clients and partners, Doxee is capable of proposing a clear approach to help clients maximize the value of business communications, how a company communicates its image to the outside world, to the extent of becoming directly involved in representing it.

The introduction of advanced methodologies to build and distribute communications can help in recovering efficiency and increasing profitability, while the adoption of CRM models and integrated document processing management solutions can enable a reduction of the time to market and increase customer base loyalty.

Furthermore, the solutions provided by Doxee allow client companies to implement digitalization processes, leading them to decrease the use of paper and other resources, with positive consequences also in terms of environmental impact.

To support the implementation of this vision and reach all the objectives it sets for itself both annually and over a period of several years, Doxee has defined its Integrated Management System Policy as follows:

### **DOXEE S.p.a. General Policy for Systems Management**

*DOXEE S.p.A commitment is expounded in maintaining, verifying and constantly improving the Integrated Management System that is based on the following fundamental principles, as regards all stakeholders.*

#### **ETHICS AND ANTI-BRIBERY**

*Doxee is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Doxee has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the countries we operate.*


*This statement applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located. The statement also applies to Officers, Trustees, Board, and/or Committee members at any level.*

#### **SOCIETY AND ENVIRONMENT**

*Doxee is committed to pursuing purposes to positively impact society and the Environment in which it operates, and must consider all stakeholders.*

#### **CLIENTS**

*Doxee's approach is strongly oriented to clients, striving to establish long lasting relationships with them, understanding and interpreting their current and future needs at best by listening closely and by meeting their expressed needs, aiming to exceed their own expectations. To this end Doxee works with enthusiasm for successful customer relations (strategic partnership approach and natural collaboration with the client), reliable and transparent collaboration (prompt analysis of critical situation), secure and confidential processing of customer data.*

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## SHAREHOLDERS

*Doxee promote the widest possible participation of shareholders in the life of the company and in the exercise of social rights, offering them, in compliance with the regulations on privileged information, complete information.*

## SUPPLIERS

*Doxee is keen on establishing mutually profitable and trusting relationships with suppliers, engaging them in sharing the principles of the Quality and Information Management Systems; such a relationship contributes to enhancing the parties ability to create value.*

## STAFF

*Doxee is a person-centric company. Every individual is considered a valuable element of growth through which the company itself grows and maximizes value created externally. This model based on sharing company objectives with personal objectives is reflected by the high degree of empathy and involvement that our people have with our clients. Direct and efficient ties are built between Doxee and client staff. This leads to establishing Doxee's soul that combines passion for all technologies, passion for services, passion for the organization and methodology, and constant focus on improvement.*

## PARTNERS

*Doxee aims at increasing business value, pursuing to constantly improve company performances and delivered services in compliance with business best practices including lawfulness, transparency, propriety and loyalty.*

*Doxee is committed to guaranteeing the implementation and adequacy of the Integrated Management System Policy through a goal achievement measurement and definition activity, the results of which are reviewed regularly by Management.*

*In addition, an annual cycle will be used for the setting of objectives for information security, to coincide with the company budget planning cycle. This will ensure that adequate funding is obtained for the improvement activities identified. These objectives will be based upon a clear understanding of the business requirements, informed by the annual management review with stakeholders.*


*While working to reach its objectives, Doxee places attention and addresses its resources in compliance with requirements from binding and legislative regulations, if applicable.*

## ENVIRONMENT

*Doxee aims at improve its performance while respecting the natural environment. The company is aware that producing services has an impact on the environment, However it is committed to constantly reducing these impacts by adopting the best possible practices.*

*The commitment will be the sharing with all the stakeholders of the objectives adopted in order to achieve sustainable development.*

*Finally, Doxee undertakes to operate in order that its activities are for the benefit of the community in compliance with current legislation.*

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## Addendum A: Document Configuration

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<i>Revision Index</i>	<i>Date</i>	<i>Description of edits</i>
1	26/11/2015	First draft
2	21/04/2017	Minor change due to organizational review
3	26/01/2018	Update for SGQ and ISMS merge in a integrated management system (IMS)
4	12/12/2018	Update for Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation)
5	09/12/2019	Update for MOG 231 implementation. Stakeholders update new section about Shareholders
6	27/01/2021	Update for EMS in a integrated management system (IMS). Minor change due to organizational review New logo
7	23/12/2021	Extention of document scope to Doxee's Affiliated Companies. Update for Benefit Corporation paradigm shift Minor change due to organizational review
8	11/04/2022	Update for ABMS in a integrated management system (IMS).