

# IRIDÉOS

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## BUSINESS CONTINUITY PLAN

in case of pandemic flu

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## 1. INTRODUCTION

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The WHO recommended to all Countries to develop a Pandemic Plan and to constantly update it following the guidelines. This Plan, drawn up according to the indications of the WHO and the Ministry of Health, represents the reference for Customers in the event of a flu pandemic.

In terms of business continuity management, this is an event that significantly hinders the flow of business processes. In fact, a pandemic flu can have significant and incisive consequences for the Company as the spread of the disease among employees and the consequent reduction of the number of staff at work can impact on company operations and consequently on the operations of the services for the customers.

This document describes the measures to be taken in the event of a pandemic to protect employees from an infection and keep the company operational.

## 2. SCOPE

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The Business Continuity Plan aims to reduce the risk of infection among workers and in the workplace and to keep the Company infrastructure in operation in order to guarantee Customers the business continuity, with the maximum commitment, and therefore the fulfillment of the service requirements even in a situation of large pandemic.

The purpose of this Plan is to identify the analytical measures and the subsequent actions for each company area, according to the specific structural and operational characteristics, in order to contain the impacts on the Company operations.

The Plan contains recommendations regarding the organizational, preventive and hygiene measures to be adopted in the event of a flu pandemic.

## 3. AREAS OF APPLICATION

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This Business Continuity Plan takes into consideration the following main areas in the event of a pandemic:

- **Health protection:** reduce the risk of contagion among the personnel;
- **Continuity of leadership and staff:** that is, to ensure that the decision-making processes are carried out effectively in order to manage any emergency and to implement what needed to safeguard the well-being of the personnel;
- **Business continuity:** ensuring that the Group's structures and operating processes can continue to provide their services;
- **Continuity of Suppliers and Customers:** ensuring that Suppliers deliver on a regular basis and that provisioning and customer assistance processes remain operational.

## 4. RECIPIENTS

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This Plan is adopted by all the companies of the IRIDEOS Group and is made available to Customers and Suppliers.

## 5. DEFINITIONS OF TERMS

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|                 |   |
|-----------------|---|
| <b>Epidemic</b> | Increased number of cases of a disease that occurs for a limited period of time in a limited geographical area.                           |
| <b>Pandemic</b> | It is an epidemic whose spread affects several geographical areas of the world, with a high number of cases for a limited period of time. |

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## 6. ABBREVIAZIONI

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|----------------|--|
| <b>BCP</b>     | Business Continuity Plan                         |
| <b>CIT</b>     | Computer Integrity Team                          |
| <b>CSIRT</b>   | Computer Security Incident Response Team         |
| <b>DPCM</b>    | Decree of the Prime Minister                     |
| <b>GDPR</b>    | General Data Protection Regulation (UE 2016/679) |
| <b>IA</b>      | Internal Audit                                   |
| <b>WHO</b>     | World Health Organization                        |
| <b>PgMO</b>    | Program Management Office                        |
| <b>QMS</b>     | Quality Management System                        |
| <b>T&amp;S</b> | Technology and Systems                           |
| <b>PCPU</b>    | Pandemic Coordination and Planning Unit          |

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## 7. GENERAL ANALYSIS OF THE PANDEMIC

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In order to ensure the operation of most of the activities, the Company has carried out an analysis of the internal and external structures that have the greatest impact on the provision of the services for the Customers. Subsequently, IRIDEOS evaluated, for the internal most critical functions, which ones are currently able to carry out remote activities and which ones must be possibly enhanced in the event of a pandemic.

## 8. ORGANIZATIONAL MEASURES

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### 8.1. Continuity of leadership and staff

A pandemic crisis inevitably generates additional tasks and increases the number of decisions that has to be taken in a timely manner in order to define the right organization to face the crisis. To this extent, IRIDEOS has set up a Pandemic Coordination and Planning Unit (PCPU) whose aim is to guarantee the crisis management and therefore the operational continuity of the Company.

La PCPU, coordinated by the Director of Technology and Systems, is composed by:

- Director of Human Resources and Organization;
- Marketing Director;
- Processes and Customer Experience Director;;
- Purchasing Manager;
- Cyber Security Manager;
- Prevention and Protection Service Manager.

The CEO supervises the decision-making processes of the Unit.

In addition, the PCPU avails itself of the support of the Director of Legal and Corporate Affairs, the Compliance, IA and QMS Manager, the Competent Doctor and the Data Protection Officer as far as their responsibility are concerned.

The Pandemic Coordination and Planning Unit is responsible for:

- Implement all the relevant measures aimed at overcoming the crisis as far as business operations are concerned (for example, organize shifts among workers, guarantee the presence of personnel, give instructions for Smart Working, etc.);
- • Adopt any physical protection measures (e.g. hygiene masks);
- • Guarantee the coverage of Customer needs and an appropriate flow of communication towards Customers;
- • Manage the relationships with the suppliers in order to guarantee the delivery of product and services;
- • Ensure periodic internal communication about any relevant change and about the course of the pandemic and support the implementation of the recommended hygiene measures.

The UCPP has the task of coordinating the corporate operating structures for the definition of appropriate Continuity Plans for each production unit.

### 8.2. Business Continuity

In case of serious epidemic/pandemic IRIDEOS declares the adoption of the following measures:

- Guarantee the replacement of the key people (especially for key functions and for the employees that has a higher risk of absence due, for example, to illness or care of family members):
  - In the event of unavailability of "staff-on-call", an urgent replacement procedure has been defined that will be activated by the functional manager (clearly and always identified);
  - As far as the assurance and monitoring activities are concerned, an operational backup is guaranteed with an external supplier.
- Waiver of non-urgent and not absolutely necessary activities;
- Setting up of a remote access system to guarantee access to the Company's IT networks.

#### 8.2.1. Analysis of the operating processes of the most affected areas of the Company

The analysis of the operating processes was carried out only for the operating units belonging to the "*Technologies and Systems*" and "*Processes and Customer Experience*" areas, since in these units the impact has been evaluated as high or medium-high.

In particular, the analysis identified the activities which, in health emergency conditions:

- cannot be suspended (key functions, crucial processes)
- can only be carried out on the Company's premises and exclude the possibility of Smart Working (eg via the Internet, telephone)
- involve direct contact with other people inside or outside the Company
- can be carried out mainly in Smart Working
- can be temporarily suspended, reducing the movement of staff (e.g. transfers)
- can be carried out by other companies (outsourcing)

Since some of the activities involve the access of personnel external to the Company (Customers, Consultants, Suppliers), specific guidelines has been defined which involve also the declaration for access being sent to each Customer, Consultant and Supplier willing to access IRIDEOS offices during the emergency.

### **8.2.2. Analysis of the tools necessary for secure working during an emergency**

The technical requirements necessary for Smart Working were verified and, where necessary, created. Work schedules relating to the execution of remote work in Smart Working mode were also agreed with the social partners to ensure the availability of personnel who perform critical functions.

For the functions that, due to the nature of the service, do not have the possibility to connect from their home, the necessary instruments have been prepared to be used in the event of a serious epidemic/pandemic. The effectiveness of the instruments is verified by periodic tests carried out together with the personnel from the interested functions.

The technical and organizational measures put in place to guarantee the operational continuity in the areas of greatest impact (Information Systems has a significant indirect impact) during a health emergency situation (serious epidemic/pandemic) are shown below.

#### **8.2.2.1. Technical Operations Department**

- T&S operating personnel in the areas of Transport, Network and Systems are equipped with tools for the remote access to the technological appliances that provide the services. Remote access has been set up via VPN with a redundant architecture.
- At Avalon Campus, in order to limit personal contacts, two IRIDEOS resources are present in addition to the reception staff.
- Physical interventions in the Data Centers by the above personnel, can be required only in exceptional cases.
- Field interventions for the maintenance and the repair of faults on fiber and network equipment, on systems or on technological appliances will be carried out by external suppliers.
- The Purchasing Department obtained from the Suppliers their BCP or a declaration of intent in case the implementation of more restrictive measures is required.
- The staff of the N&SO, NOC and SOC structures must attend the office with a reduced shiftwork schedule, in compliance with the regulations, and must avoid gatherings of people (e.g. minimum distance of one meter) or, where it is not possible, use individual protective devices such as disposable masks, etc.

#### **8.2.2.2. Customer Operations**

- The COPS T&S staff belonging to the areas of Support Enterprise, Service Activation, Solution Engineering and Service Management are equipped with tools for the remote access to the technological appliances that provide the services and to the monitoring and management systems.
- Physical interventions in the Data Centers by the above personnel, can be required only in exceptional cases.
- The H24 Escalation Desk dedicated to the network monitoring and to the A4 SPOC, that is located in Verona, manages all monitoring activities from a remote location.
- Field interventions for the maintenance and the repair of faults on fiber and network equipment, on systems or on technological appliances will be carried out by external suppliers.
- The Purchasing Department obtained from the Suppliers their BCP or a declaration of intent in case the implementation of more restrictive measures is required.

- Smart Working has been activated for:
  - 100% of Solution Engineering staff,
  - 80% of Service Activation staff,
  - 80% of Customer Support staff,
  - 100% of Service Management staff.

### 8.2.2.3. Information System

- All personnel in the area of Information Systems are equipped with tools for the remote access to the technological infrastructure that provide the services. Remote access has been set up via VPN with a redundant architecture.
- There are no cases in which, for the provision of the characteristic activities, a physical intervention at any of the Data Centers or any of the Company offices may be required to the above personnel, since the maintenance of the physical infrastructure is the responsibility of the Technical Operations staff.
- Should cases not currently hypothesized occur, the Head of the Technical Operation Department identifies the professional figure available among the internal staff-on-call or from external suppliers and informs his superiors according to the defined escalation path.
- Conservative or corrective interventions on critical application infrastructures (Ticketing, Infrastructure Monitoring, Data Retention for Crime Contrast and compliance with binding regulatory obligations, etc.), on specific systems or on technological equipment take place through external suppliers.
- The Purchasing Department obtained from the Suppliers their BCP or a declaration of intent in case the implementation of more restrictive measures is required.

### 8.2.2.4. Processes and Customer Experience

- The PCE personnel are equipped with tools for the remote access to the technological infrastructure that provide the services and to the monitoring and management systems.
- The SMEs & Reseller Customer Operations area inside the PCE keeps providing Customer Care operations for SMEs with 80% of personnel in Smart Working. This situation is in any case adequate to the slowdown of the activities of the final target market of the Customers due to the restrictive provisions imposed by the Authorities.
- There are no cases in which, for the provision of the characteristic activities, a physical intervention inside any of the Company's premises may be required to the above personnel.
- Field interventions for the maintenance and the repair of faults on access lines and on network equipment located at the IRIDEOS Customer's premises, will be carried out by external suppliers.
- Field interventions for the maintenance and the repair of faults on access lines and on network equipment located at the Reseller's customers premises will be carried out directly by the Reseller.
- The Purchasing Department obtained from the Suppliers their BCP or a declaration of intent in case the implementation of more restrictive measures is required.

### 8.3. Operational Continuity of the Suppliers

Some of the services that the Company provides to the Customers are strongly linked to external Suppliers, therefore it has been carried out an analysis aimed at identifying the most critical suppliers to be involved in this Plan. The Suppliers involved were asked to provide their Business Continuity Plan as an integration to this Business Continuity Plan - in case of pandemic flu.

| Supplier                | Impact on Customers operations | Notes   |
|-------------------------|--------------------------------|---|
| Network Infrastructures | High                           | The suppliers of infrastructure has an high impact in final Customers operations.   |
| Hardware components     | High                           | The suppliers of hardware components used to provide Customers with their services has a relevant impact on Customers operations.   |
| Maintenance             | High                           | The companies that carry out maintenance and monitoring activities on the network and on the IT systems support the operational functions in the interventions at the Customers' offices. For this reason they have a significant impact on Customers operations. |
| Software                | High                           | The suppliers who maintain the software used by internal staff to provide the services to the Customers impact on their operations.   |

Table 4: Analysis of the external structures - High impact areas

#### 8.4. Risk analysis for critical suppliers

The most critical Suppliers have been asked to evaluate the possibility of a pandemic, and provide their own Pandemic Plan.

| Supplier                | Risk probability | Notes  |
|-------------------------|------------------|--|
| Network Infrastructures | Low              | Network Infrastructures suppliers are Carriers with a national coverage and have their own Pandemic Plan.  |
| Hardware components     | Low              | The risk was defined as low since the spare parts used for routine maintenance are stocked in such quantities as to overcome several months of supply interruption.  |
| Maintenance             | Low              | The maintenance companies are different and are located throughout the national territory and in the event of an emergency they are interchangeable with each other. |
| Software                | Low              | Suppliers or partners who supply critical SW are organized in such a way as to guarantee continuity of assistance even in the event of a pandemic.                   |

#### 8.5. Business Continuity for Customers

Given the nature of the services offered by IRIDEOS, an interruption could cause serious inconvenience to all Customers. Therefore, instead of drawing a priority list, the Company has the only goal to guarantee the continuity of the services even in the event of a pandemic. The Company is currently organized in such a way as to protect the continuity of the services for all the Customers.

## 9. PREVENTIVE MEASURES

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In addition, to promote the adoption of correct behaviors that can help reduce the spread of the pandemic, IRIDEOS has distributed specific information to each employee regarding the behavioral rules to be adopted.

The Company Management, if necessary, informs the internal staff on the preparations for a possible pandemic. Below is a brief summary of the behavior suggested to all staff, in order to limit the spread of the virus.

### 9.1. Main personal non-pharmacological measures

- Personale hygiene
- Social distancing measures
- Self-protection measures in case of increased risk of infection
- Knowledge of personal behavior to be adopted in the event of known or suspected flu.

#### 9.1.1. Personal hygiene

Individual hygiene measures contribute to slowing down the spread of flu, it is necessary to:

- Wash the hands often and thoroughly with soap and water;
- Cover nose and mouth with a disposable tissue or flexed elbow when coughing or sneezing;
- Discard the contaminated material (e.g. paper towels) in a waste bin, preferably with a lid;
- Wash the hands with soap after using disposable tissues.

#### 9.1.1. Interpersonal contacts

- Use telephone and Internet (e-mail) as much as possible and organize video conferences for daily activities even if the participants are in the same building;
- Prohibition of any type of travel, unless expressly authorized for specific reasons of urgency;
- Avoid all not strictly necessary interviews and cancel meetings, workshops, training courses etc.;
- Provide information and receive orders by phone or e-mail;
- Lock the entrance doors of the building;
- Give up on handshakes..

#### 9.1.2. Gatherings of people in the workplace

- Suspend fixed entry and exit times from work;
- Organize shifts so as to avoid overlaps;
- Avoid taking the lift as far as possible;
- Close cafeterias and restaurants for staff.

#### 9.1.3. Social distancing measures

The probability that the flu virus is transmitted from person to person is reduced by increasing the interpersonal distance, therefore it is necessary to maintain a distance of at least one meter from person to person and to avoid gatherings.

#### 9.1.4. Self-protection measures

At each location thermometers and instruments suitable for measuring body temperature are available for staff and guests.

**9.1.5. Knowledge of staff behavior (internal / external) in the event of known or suspected flu**

In the event that an employee shows symptoms or his/her virus positivity has been ascertained with diagnostic tests against the viruses for which the health emergency has been communicated, the Company will need to access the information regarding the employee's business travels (travel or hotel) in order to be able to map the movements outside the IRIDEOS structures.

The presence of external staff inside one of the IRIDEOS offices is recorded by the Reception desk. In this case the Company, in compliance with the policies for the protection of personal information as sanctioned by the GDPR, will be in any case allowed to access information regarding any contact or meeting with the internal staff.

**9.2. Hygiene of the workspace and of the surrounding environment**

**9.2.1. Room ventilation / air conditioning**

The premises must be regularly ventilated every 1 hour, opening both windows and doors. The use of forced convection ventilation systems is forbidden.

**9.2.2. Cleaning**

The premises are generally cleaned on a continuous and regular basis, the surfaces and the floors are cleaned with a detergent without the need for special disinfectants. The surfaces that are touched more often and by different people are cleaned more frequently.

In the event of a serious epidemic / pandemic, the offices cleaning and sanitizing procedures will be done as follows:

- Higher alcohol- or chlorine-based products are used.
- Specialized companies are contacted to proceed with the planned sanitization of the buildings, upon providing a specific documentation with all the details about the sanitization process.

**10. MONITORING THE EFFECTIVENESS AND THE EFFICIENCY OF THE IMPLEMENTED MEASURES**

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If the pandemic crisis occurs and it is necessary to implement this Business Continuity Plan, the Pandemic Coordination and Planning Unit will meet weekly or more frequently, also on a daily basis, according to the recorded level of the crisis, in order to verify the adequacy of the Business Continuity Plan and to possibly adopt any corrections or improvements to ensure its effectiveness.

## **11. LEGISLATIVE MEASURES FOR THE EMERGENCY OF CORONAVIRUS – COVID-19**

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To combat the Coronavirus Pandemic - COVID-19, the Company strictly follows the Legislative provisions listed below (together with any of their amendments).

- DECREE 23<sup>rd</sup> February 2020, n. 6 Urgent measures regarding the containment and management of the epidemiological emergency from COVID-19;
- DECREE OF THE PRIME MINISTER 25<sup>th</sup> February 2020, Additional implementing rules of the Decree 23<sup>rd</sup> February 2020, n. 6, with Urgent measures regarding the containment and management of the epidemiological emergency from COVID-19;
- DECREE OF THE PRIME MINISTER 8<sup>th</sup> March 2020, Additional implementing rules of the Decree 23<sup>rd</sup> February 2020, n. 6, with Urgent measures regarding the containment and management of the epidemiological emergency from COVID-19;
- DECREE OF THE PRIME MINISTER 8<sup>th</sup> March 2020 and subsequent amendments, Additional implementing rules of the Decree 23<sup>rd</sup> February 2020, n. 6, with Urgent measures regarding the containment and management of the epidemiological emergency from COVID-19, in force on the whole national territory;
- DECREE OF THE PRIME MINISTER 11<sup>th</sup> March 2020 and subsequent amendments, Additional urgent measures for the containment of the contagion on the whole national territory.
- DECREE OF THE PRIME MINISTER 22<sup>nd</sup> March 2020, , Additional implementing rules of the Decree 23<sup>rd</sup> February 2020, n. 6, with Urgent measures regarding the containment and management of the epidemiological emergency from COVID-19, in force on the whole national territory;
- DECREE 25<sup>th</sup> March 2020 n. 19, Urgent Measure regarding the management of the epidemiological emergency from COVID-19, in force on the whole national territory;
- DECREE OF THE PRIME MINISTER 1<sup>st</sup> April 2020, Implementing regulations of the Decree 25<sup>th</sup> March 2020 n. 19, Urgent Measure regarding the management of the epidemiological emergency from COVID-19, in force on the whole national territory.

The Pandemic Coordination and Planning Unit has the task of monitoring any new Legislative provisions issued by the competent Authorities for the management of the emergency from Coronavirus and to consequently adapt the measures adopted by the Company.

As far as the Coronavirus is concerned, IRIDEOS applies all the provisions of this "Business Continuity Plan in the event of a pandemic flu" and arranges the following specific measures to supplement it:

- Company indications to Customers, Suppliers and Consultants regarding Coronavirus information - COVID-19 (Annex 1)

**Annex 1**

**COMPANY INDICATIONS TO CUSTOMERS, SUPPLIERS AND CONSULTANTS REGARDING THE INFORMATION CONCERNING THE CORONAVIRUS - COVID-19**

The World Health Organization (WHO) has declared the Coronavirus epidemic (COVID-19) a "global health emergency" and it has said that the virus spread is currently one of the greatest dangers to public health.

Within the IRIDEOS Group, the HSE function, in consultation with the Coordinating Competent Physician and in line with the provisions of the governmental, national and / or local authorities and / or the recommendations of the Civil Protection and / or competent health authorities, is monitoring the phenomenon and implementing all the necessary actions to reduce the risks to employees and other stakeholders.

We remind that to prevent COVID-19 transmission it is first of all advisable to adopt the usual prevention measures for common respiratory infections, including: • Hand washing; • Cover mouth and nose with your bent elbow or tissue when coughing and sneezing; • Dispose of the used tissues immediately • Pay particular attention to surface hygiene; • Avoid close contact with people with flu-like symptoms; • Do not take antiviral or flu medicines unless prescribed by your doctor.

It is good practice to consult a doctor and stay at home if suffering from flu syndrome. Follow the precautions provided by the World Health Organization and by the competent health authorities, and seek medical advice in case of symptoms evolution.

According to what stated above, we invite you to sign the following declaration before accessing any of the IRIDEOS offices or structures, handing it in or sending it to the e-mail address spp@irideos.it.

I the Undersigned \_\_\_\_\_

Company Name \_\_\_\_\_

Role \_\_\_\_\_

declare

i) to comply with all the prevention and protection measures in accordance with the recommendations and instructions of the WHO and of the competent health authorities and, in general, with the coercive and / or guiding acts of the national and / or local government authorities aimed at preventing the spread of Coronavirus COVID-19; (ii) to inform directly, or by the means of other person, the personnel and / or contact persons of the IRIDEOS Group should any dangerous situations involve me; (iii) as far as I am aware, that I have not come into contact with people tested positive for COVID-19 and (iv) that I am not coming from quarantined areas.

...../...../ 2020

Signature

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*Note: This form is collected in line with the legislation on the protection of personal data and with the specific indications of the Italian Data Protection Authority issued on March 3, 2020. It will be kept until the end of the state of emergency, as declared by a specific Act from the national and / or local government authorities and / or by the competent health Authorities.*