



Policy
Integrated Management System

Approved by:

A handwritten signature in blue ink, appearing to read "Miguel Acero", is positioned below the "Approved by:" text.

Miguel Ángel Acero
VP Operations



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Signature control

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1 Introduction

AFR-IX is an infrastructure and telecommunications operator that provides quality telecommunications services, Network Operations Centre (NOC) operation and management of the Barcelona Cable Landing Station facilities. The company is part of a global connectivity network.

To carry out these services, AFR-IX develops business processes that require information management through IT services integrated into an information system, operating legalised technical facilities that comply with applicable environmental, industrial and safety regulations.

AFR-IX recognises the need to:

- » Provide services and products that consistently meet customer requirements and applicable legal and regulatory requirements.
- » Protect the environment, prevent pollution and manage natural resources sustainably.
- » Provide safe and healthy working conditions to prevent work-related injuries and ill health.
- » Ensure the security of the information it manages, as well as the services it handles, protecting their confidentiality, integrity and availability.

2 Objective

The purpose of this document is to establish the general guidelines that determine AFR-IX's commitment to ensuring:

- » The **quality** of the services and products provided to customers, ensuring their satisfaction and complying with applicable requirements.
- » The **protection of the environment** through the proper management of environmental aspects, the prevention of pollution and compliance with legal environmental requirements.
- » The **health and safety at work** of all employees, eliminating hazards and reducing occupational risks, encouraging employee participation and consultation.
- » The **protection of services, information and personal data (PII)** managed in its business processes, complying with legal compliance requirements and preventing unauthorised access.

3 Scope

This integrated policy applies to AFR-IX's Integrated Management System (IMS), which covers the following standards:

- » **ISO 9001:2015** - Quality Management Systems
- » **ISO 14001:2015** - Environmental Management Systems
- » **ISO 45001:2018** - Occupational Health and Safety Management Systems
- » **ISO/IEC 27001:2023** - Information Security Management Systems

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3.1 Organisational Scope

Company name: AFR-IX, S.A.

Location: Cable Landing Station building, Ramon Viñas 4, 08930 Sant Adrià de Besòs, Barcelona, Spain.

3.2 Scope of Activities

The scope of the Integrated Management System covers the following activities:

" Telecommunications Services (MPLS, DIA, IP Transit, IPLC, SD-WAN, Managed Services, DDos Shield, Cloud Services), operation of the Network Operations Centre and Services provided at the Barcelona Cable Landing Station facilities."

With justified exclusion of:

Installation and maintenance of submarine cables (carried out by specialized external contractors, whose work must also be controlled through external contractor control procedures).

3.3 Legalisation of Facilities

AFR-IX operates duly legalised technical facilities that comply with applicable environmental, industrial and safety regulations. The company maintains ongoing compliance with all legal and regulatory requirements applicable to its facilities and operations, including:

- » Environmental authorisations for the storage of substances (diesel for emergency generators).
- » Industrial legalisation of electrical installations and air conditioning systems.
- » Fire safety and protection certifications.
- » Compliance with occupational health and safety regulations.

4 Policies

- > The Information Management System Policy must be read and understood by all AFR-IX employees and/or collaborators.

5 Roles and Responsibilities

This policy involves and must be complied with by all AFR-IX personnel and any other interested party that interacts with its integrated management system.

Senior Management:

AFR-IX Senior Management is responsible for:

- » Approving and communicating this Integrated Management Policy.
- » Providing the necessary resources to achieve the objectives of the integrated system.
- » Assigning delegated authority to the appropriate personnel to fulfil their responsibilities in managing the system.

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- » Periodically reviewing the performance of the system and promoting continuous improvement.

Integrated Management Committee:

The **Integrated Management Committee** is established as a cross-functional body within AFR-IX for the supervision and management of the Integrated Management System. This committee incorporates and expands the functions of **the Information Security Committee** previously established for ISO 27001, extending them to all areas of the integrated system.

The Integrated Management Committee is responsible for:

- » Coordinating activities related to quality, the environment, occupational health and safety, and information security.
- » Monitoring compliance with the integrated objectives of the system.
- » Evaluating the overall performance of the management system.
- » Approving action plans and continuous improvement.
- » Ensuring the adequate allocation of resources.

Area Managers:

Specific functional managers include:

- » **Integrated Management System Manager:** Coordinates the implementation, maintenance and improvement of the integrated system.
- » **Quality Manager:** Ensures compliance with quality requirements and customer satisfaction.
- » **Environmental Manager:** Manages environmental aspects, legal requirements and environmental protection programmes.
- » **Occupational Risk Prevention Manager:** Oversees worker health and safety, manages occupational risks and coordinates preventive activities.
- » **CISO (Chief Information Security Officer):** Responsible for coordinating the implementation, maintenance and improvement of the Information Security Management System, notifying staff of the security policy and managing its audits.

All Staff:

All AFR-IX staff are responsible for:

- » Complying with the requirements established in this policy and in the integrated system procedures.
- » Actively participating in continuous improvement activities.
- » Reporting incidents, non-conformities and opportunities for improvement.
- » Contributing to environmental protection and occupational risk prevention.
- » Maintaining information security in the performance of their duties.

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6 Description

6.1 Principles of the Integrated Management System

The fundamental principles that will govern the integrated management of quality, environment, occupational health and safety, and information security at AFR-IX are as follows:

6.1.1 Focus on Customers and Stakeholders

AFR-IX is committed to understanding and meeting the requirements and expectations of customers and other relevant stakeholders, including employees, suppliers, regulatory authorities and the local community. The organisation seeks to exceed expectations by delivering high-quality services and maintaining relationships of trust.

6.1.2 Risk-Based Management

The integrated system is based on a risk-based approach, analysing the impacts and probabilities of risks that may threaten:

- » The quality of services
- » The environment
- » The health and safety of workers
- » Information security

Measures are implemented to address these risks at levels that do not affect the achievement of business objectives, while also considering opportunities for improvement. The risk assessment takes into account stakeholders, internal and external factors that condition the AFR-IX management system, and the legal framework in which the company operates.

6.1.3 Process Approach

AFR-IX manages its activities through interrelated processes that function as a coherent system. This approach allows us to understand how results are created and delivered, optimise system performance, and ensure consistency, effectiveness, and efficiency in achieving the intended results.

6.1.4 Continuous Improvement

The organisation is committed to the continuous improvement of its overall performance through:

- » Service Quality
- » The establishment of measurable objectives and the monitoring of performance indicators.
- » Conducting regular internal and external audits.
- » Analysing non-conformities, accidents, incidents and near misses to implement corrective and preventive actions.
- » Periodic review of the system by management to ensure its continued suitability, adequacy and effectiveness.
- » The provision of mechanisms for regular review of the operation of the system, analysing measures to correct malfunctions and actively seeking opportunities for improvement.

6.1.5 Leadership and Commitment

Senior management demonstrates leadership and commitment to the integrated management system by:

- » Conducting regular internal and external audits.

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- » Ensuring that the integrated policy and objectives are compatible with the context and strategic direction of the organisation.
- » Integrating system requirements into the organisation's business processes.
- » Promoting the use of a process approach and risk-based thinking.
- » Communicating the importance of effective management and compliance with the requirements of the integrated system.

6.1.6 Participation and Consultation

AFR-IX promotes the active participation of workers and their representatives in all aspects of the management system, especially in:

- » The identification of hazards and assessment of occupational risks.
- » Determining control measures and their effective use.
- » The investigation of incidents and non-conformities.
- » The identification of opportunities for improvement.

6.1.7 Competence and Awareness

The organisation ensures that:

- » Personnel performing work under the control of the organisation shall be competent, based on appropriate education, training or experience.
- » Personnel are aware of the integrated policy, their contribution to the effectiveness of the system, and the implications of not complying with the requirements of the system.
- » Specific training is provided on quality, environmental, occupational risk prevention, and information security aspects according to the needs of each position.
- » All personnel receive appropriate awareness training on the information security risks they may face.

6.1.8 Legal and Regulatory Compliance

AFR-IX maintains a systematic process to:

- » Identify and assess legal and other applicable requirements related to quality, the environment, occupational health and safety, and information security.
- » Periodically evaluate compliance with these requirements.
- » Maintain facilities in compliance with applicable environmental, industrial, and safety regulations.
- » Implement the necessary actions to ensure ongoing compliance and respond to changes in applicable legislation.
- » Analyse in detail the legal framework within which the company's activities are framed.

6.2 Specific Commitments by Area

6.2.1 Quality Management (ISO 9001)

AFR-IX is committed to:

- » Provide products and services that meet customer requirements and applicable legal and regulatory requirements.
- » Increase customer satisfaction through the effective application of the quality management system.
- » Ensure the availability and quality of telecommunications services and NOC operation.

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- » Effectively manage non-conformities and customer complaints by implementing appropriate corrective actions.
- » Maintain and continuously improve the effectiveness of the quality management system.

6.2.2 Environmental Management (ISO 14001)

AFR-IX is committed to:

- » Protecting the environment, including pollution prevention and other specific commitments relevant to the context of the organisation.
- » Properly managing significant environmental aspects, including:
 - > Responsible consumption of natural resources (electricity, water, fuels).
 - > Proper waste management, promoting the circular economy and recycling.
 - > Safe storage of hazardous substances (e.g., diesel fuel for emergency generators with a total capacity of 4,000 litres).
 - > Control of atmospheric emissions and energy efficiency.
- » Comply with applicable environmental legal requirements and maintain facilities in good legal standing.
- » Preventing pollution and reducing the environmental impact of our activities.
- » Continuously improve the organisation's environmental performance.

6.2.3 Occupational Health and Safety (ISO 45001)

AFR-IX is committed to:

- » Provide safe and healthy working conditions to prevent work-related injuries and ill health.
- » Eliminate hazards and reduce risks to occupational health and safety.
- » Consulting and promoting the participation of workers and, where they exist, workers' representatives.
- » Implement and maintain an effective emergency management system, including first aid and emergency preparedness.
- » Investigate occupational incidents and accidents to prevent their recurrence.
- » Comply with legal and other applicable occupational health and safety requirements.
- » Continuously improve the occupational health and safety management system and OHS performance.

6.2.4 Information Security (ISO 27001)

AFR-IX is committed to:

- » Protect the confidentiality, integrity and availability of information by implementing a risk management process.
- » Implement appropriate security controls to mitigate identified risks to information and information systems, ensuring end-to-end security.
- » Establish measures for monitoring, surveillance, detection, response and recovery in the event of information security incidents.
- » Comply with legal, statutory, regulatory and contractual requirements related to information security and personal data protection.
- » Provide ongoing training and awareness in information security to all staff and raise awareness throughout the company of the need for a proactive stance in defending information security and services.

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- » Implement information technology management processes in a formal, consistent and documented manner.
- » Continuously improve the information security management system.

6.3 Implementation and Operation of the Integrated System

To comply with the principles and commitments established in this policy, AFR-IX has implemented an Integrated Management System (IMS) based on the High Level Structure (HLS) common to ISO 9001, ISO 14001, ISO 45001 and ISO/IEC 27001 standards.

6.3.1 System Documentation

The integrated system is documented by:

- » This Integrated Management Policy, which establishes the general guidelines for the system.
- » An Integrated Management Manual that describes the context of the organisation, the scope of the system and the main processes.
- » Documented procedures detailing how the system processes are carried out. These policies and procedures are reviewed annually.
- » Work instructions and other operational documents necessary to ensure effective planning, operation, and control of processes.
- » Records that provide evidence of compliance with requirements and the effective operation of the system.

6.3.2 Setting Objectives

AFR-IX establishes measurable objectives in the areas of quality, environment, occupational health and safety, and information security that:

- » Are consistent with the integrated policy.
- » Are measurable and have indicators that are monitored regularly.
- » Take into account applicable requirements.
- » Are communicated to relevant persons.
- » Are updated as appropriate.
- » They have designated owners.
- » They have sufficient resources.
- » They have plausible deadlines for compliance.
- » They are frequently reviewed in terms of their development and implementation.
- » They are obtained from regular system reviews, internal and external audit non-conformities.

6.3.3 Performance Evaluation

The organisation monitors, measures, analyses and evaluates the performance of the integrated system through:

- » Performance indicators to measure progress towards established objectives.
- » Periodic internal audits to verify the conformity and effectiveness of the system.
- » Assessment of compliance with legal and other applicable requirements.
- » Management reviews to ensure the continued suitability, adequacy and effectiveness of the system.

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6.3.4 Non-Conformity Management and Improvement

When non-conformities, incidents or accidents are detected, AFR-IX:

- » Reacts to the non-conformity or incident, takes action to control and correct it, and addresses the consequences.
- » Assess the need for actions to eliminate the causes of the non-conformity or incident, so that it does not happen again.
- » Implements the necessary actions and reviews their effectiveness.
- » Updates the identified risks and opportunities, if necessary.
- » Makes changes to the integrated management system, if necessary.

6.4 Corporate Commitment

AFR-IX Senior Management is firmly committed to:

- » Communicate this Integrated Management Policy to all company employees and to those external individuals and organisations that require knowledge of it. This document will be published in a medium accessible to all involved and will be reviewed periodically. This communication will be complemented by internal awareness-raising actions that facilitate the integration of this system into AFR-IX's business objectives.
- » Provide sufficient resources (human, technological, financial and infrastructure) to fulfil the purpose of the Integrated Management System.
- » Assign delegated authority to appropriate personnel to fulfil their responsibilities in the management of the integrated system.
- » Establish and maintain the Integrated Management Committee as the governing body of the system.
- » Integrate the requirements of the integrated management system into the organisation's business processes.
- » Periodically review the performance of the integrated system and promote its continuous improvement.
- » Promote an organisational culture that supports the intended results of the integrated management system.
- » Lead and support people to contribute to the effectiveness of the integrated management system.
- » Ensure that the integrated management system achieves the intended results.

This policy will be reviewed annually or when significant changes in the organisation or its context require it, to ensure that it remains appropriate for the organisation's purpose.

6.5 Communication and Awareness

This Integrated Management Policy is communicated to:

- » All AFR-IX staff through training activities, awareness sessions and publication in accessible internal media.
- » Customers, suppliers, contractors and other relevant stakeholders as applicable.
- » The general public through its availability as a document for external use.

AFR-IX is committed to providing ongoing training and awareness to ensure that all staff understand:

- » The integrated management policy and objectives relevant to their work.



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- » Their contribution to the effectiveness of the integrated system, including the benefits of improved performance.

The implications of not complying with the requirements of the integrated management system.

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7 APPENDIX

7.1 Glossary

7.2 Abbreviations

7.3 References

This policy is based on the requirements of the following international standards:

- » The implications of not complying with the requirements of the integrated management system. UNE-EN ISO 9001:2015 - Quality management systems. Requirements.
- » UNE-EN ISO 14001:2015 - Environmental management systems. Requirements with guidance for use.
- » ISO 45001:2018 - Occupational health and safety management systems. Requirements with guidance for use.
- » UNE-ISO/IEC 27001:2023 - Information technology. Security techniques. Information security management systems. Requirements.

Related documents:

- » AFR-IX Integrated Management Manual.
- » Integrated Management System Procedures.
- » Applicable legislation on quality, environment, occupational health and safety, and information security.

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8 Confidentiality and ownership

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