## navēgalo

## R-00-03 INTEGRATED MANAGEMENT SYSTEM POLICY

NAVÉGALO S.A., a company dedicated to Data Center Services, Telecommunications (Internet and IP Telephony), Cybersecurity and Digital Marketing, with national and international presence and headquarters located in Centro Colón, San José, Costa Rica, and network nodes in Alajuelita, Berlin, Santa Ana and Raicero, has decided to maintain and continually improve an Integrated Management System (IMS) based on the standards ISO 9001:2015, ISO 14001:2015, ISO 27001:2022, ISO 50001:2018, INTE/ISO 14064-1:2019, INTE B5:2021 and PCI DSS v4.

Top Management is committed to using the IMS as a strategic tool to:

- Ensure business continuity and operational resilience.
- Comply with applicable legal, regulatory, contractual, and other requirements related to quality, environment, energy, information security, and payment data protection.
- Prevent pollution, reduce emissions, and promote energy efficiency.
- Protect critical assets and sensitive information, ensuring their confidentiality, integrity, and availability.
- Achieve continuous improvement in IMS performance and in the satisfaction of interested parties.
- Promote technological innovation and environmental and energy sustainability.

To achieve this, NAVÉGALO's Integrated Management System is based on the following principles:

- Quality and Customer Satisfaction: Direct quality efforts toward customer and stakeholder satisfaction through the commitment of the entire organization, from Top Management, to meet their needs, expectations, and requirements, applying a process-based approach focused on risks and opportunities.
- Environmental Protection: Identify, evaluate, and control the environmental aspects
  and impacts of our operations, ensuring compliance with legal and other applicable
  requirements, establishing mechanisms for pollution prevention, and promoting
  continuous improvement of environmental performance.
- Energy Management: Promote the efficient use of energy and natural resources by establishing energy baselines, performance indicators, and continuous improvement programs to optimize energy consumption and reduce the carbon footprint.
- Information Security: Ensure the security of information belonging to NAVÉGALO and its customers through facilities with high standards of physical and logical protection, preventing security incidents and malicious software, and establishing applicable controls, agreements, and policies for employees, providers, and other relevant interested parties. A specific Information Security Policy is in place to ensure the confidentiality, integrity, and availability of information in accordance with the organization's risk management framework.
- PCI DSS Compliance: Ensure compliance with PCI DSS v4 requirements applicable to



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the server colocation service offered at NAVÉGALO's Data Center, so that PCI DSS-certified customers can process and protect payment card data within a secure infrastructure with documented physical, logical, and access controls.

- Greenhouse Gas Emission Mitigation and Reporting: Comply with INTE/ISO 14064-1:2019 and INTE B5:2021 requirements, ensuring the quantification, reporting, and verification of greenhouse gas emissions, while promoting actions for their reduction, compensation, and neutralization toward a carbon-neutral operation.
- Technological Innovation: Analyze, adopt, and maintain technologies that contribute to the effectiveness, efficiency, and security of the IMS, prioritizing those that optimize performance, reduce risks, and strengthen sustainability.
- Training and Awareness: Train and raise awareness among personnel, contractors, and suppliers regarding IMS commitments—promoting organizational culture, environmental responsibility, energy efficiency, information security, and customer satisfaction. Training plans will be reviewed annually and aligned with IMS objectives.

This policy serves as a framework for defining IMS objectives and targets and will be reviewed at least once a year during the Management Review or when significant changes occur in the context, risks, interested parties, or regulatory requirements.

**NAVÉGALO** is committed to communicating, disseminating, and making this policy available at all organizational levels and to relevant interested parties, thereby reinforcing the culture of security, sustainability, quality, and continuous improvement that characterizes the organization.

**Tyson Ennis Mackay** *General Director*