

# Confidentiality Policy

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## 1 Policy brief and purpose

EMEC's confidentiality policy has been designed to explain how employees are expected to treat confidential information. Employees will unavoidably receive and handle personal and private information about clients, partners and our company. EMEC wants to make sure that this information is well-protected.

EMEC must protect this information for two reasons. It may:

- Be legally binding (e.g., sensitive customer data)
- Constitute the backbone of our business, giving us a competitive advantage (e.g., business processes)

For information on how EMEC protects the rights and freedoms of individuals who share personal or sensitive information with the Company, see the Privacy Policy (MAN085).

## 2 Scope

This policy applies to all employees (including board members), investors, contractors and volunteers who may have access to confidential information.

Any breach of the policy is likely to constitute a serious disciplinary matter for the individual concerned. This could constitute gross misconduct for which an offending employee may be dismissed without notice. It may also cause serious damage to the reputation and standing of EMEC.

## 3 Policy elements

Confidential and proprietary information is secret, valuable, expensive and/or not easily replicated. Common examples of confidential information are:

- Unpublished financial information;
- Data of Customers/Partners/Vendors;
- Know how (information, knowledge, data, trade secrets, inventions, programs, and other matters concerning EMEC's business);
- Patents, formulas, or new technologies;
- Customer lists, data and information (existing and prospective);
- Data entrusted to our company by external parties;
- Pricing/marketing and other undisclosed strategies;
- Documents and processes explicitly marked as confidential;
- Unpublished goals, forecasts and initiatives marked as confidential.

Employees may have various levels of authorised access to confidential information. In general, unless information has already been published externally (e.g., by EMEC or a client/partner in a published report or online), it should be treated as confidential except when the explicit permission of EMEC or relevant client/partner has been obtained. If in doubt, do not share said information and seek guidance from your line manager or the corporate affairs team.

What employees should do:

- Lock screens when leaving laptops;

- Secure confidential information at all times;
- Shred confidential documents when they're no longer needed;
- Make sure they only view confidential information on secure devices;
- Only disclose information to other employees when it's necessary and authorised;
- Keep confidential documents and discussions inside EMEC premises as far as possible;
- Ensure that confidential discussions cannot be overheard by external parties either in the proximity or on calls (phone calls, Teams, Zoom etc.);
- Ensure that confidential information transferred outside the organisation is done so in a secure manner.

What employees shouldn't do:

- Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of our company
- Replicate confidential documents and files and store them on insecure devices

When employees stop working for EMEC, they are obliged to return any confidential files and delete them from their personal devices.

## 4 Confidentiality measures

EMEC will take measures to ensure that confidential information is well protected. EMEC will:

- Have a policy of screens locking automatically after a few minutes inactivity;
- Use the secure print option to ensure sensitive printed material is not left unattended at the printer;
- Store and lock paper documents;
- Encrypt electronic information and safeguard databases;
- Ask employees to sign a confidentiality agreement;
- Provide authorisation by senior management to allow employees to access certain confidential information.

## 5 Working remotely and traveling

Employees should take exceptional care when working outside of EMEC's premises e.g., working remotely or working while traveling. The following precautions should be taken:

- Consider whether it is an appropriate place and time to work.
- Ensure that laptops or physical documents are always kept secure.
- Ensure that others around you cannot see confidential information or overhear confidential discussions.
- Ensure the location is suitable for the work being carried out.

## 6 Exceptions

Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

- If a regulatory body requests it as part of an investigation or audit;

- If our company examines a venture or partnership that requires disclosing some information (within legal boundaries).

In such cases, employees involved should document their disclosure procedure and seek authorisations if required. Information disclosed to a third party must be covered by a contract or a non-disclosure agreement. EMEC is bound to avoid disclosing more information than needed.

## 7 Communication and review

This policy will be communicated to staff via the Employee Handbook, during induction, and at staff meetings.

This policy will be reviewed on a biennial basis.