

## **Employee Confidentiality Policy**

### **1. Overview and Purpose**

The Employee confidentiality policy explains how we expect our employees to treat confidential information. Employees will unavoidably receive and handle personal and private information about clients, partners and our company. Such information could be legally binding and may constitute the backbone of our business, giving us a competitive advantage. We want to make sure that such information is well-protected.

### **2. Scope**

This policy applies to all EFD employees (permanent, contract and temporary), contractors, consultants and all other workers in the company and its subsidiaries, including all personnel affiliated with third parties.

### **3. Policy**

3.1 Depending on your roles and responsibilities, you may have various levels of authorized access to confidential information. Confidential and proprietary information is secret, valuable, expensive and/or easily replicated. Common examples of confidential information are:

- Unpublished financial information
- Data of Customers/Partners/Vendors
- Patents, formulas or new technologies
- Customer lists (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- Unpublished goals, forecasts and initiatives marked as confidential

3.2 You should:

- Lock or 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 authorized
- Keep confidential documents inside our company's premises unless it's absolutely necessary to move them

3.3 You should not:

- 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

3.4 When you stop working for our company, you're obliged to return any confidential files and delete them from your personal devices, if any.

#### **4. Policy Compliance**

##### **4.1 Compliance Measurement**

The Group will verify compliance to this policy through various methods, including but not limited to business tool reports, internal and external audits, and feedback to the policy owner.

##### **4.2 Exceptions**

Any exception to the policy must be approved by the policy owner in advance.

##### **4.3 Non-Compliance**

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. We may take legal action in cases of any unlawful behavior.