

# CONFIDENTIALITY POLICY

## Business Scope

Provision of Civil, Electrical and Mechanical Services to the Commercial, Industrial and Public Sectors, within the UK. These services are coordinated through a head office complex and delivered in the field via skilled and trained operators. The laying of Asphalt Mixes by hand and machine in accordance with National Highways Sector Scheme 16.

## General Statement of Intent

This Confidentiality Policy refers to the disclosure of important information that the company holds. The policy affects all employees and others that may have access to confidential information, such as board members, investors, contractors, and volunteers. During the course of everyday business, employees will unavoidably receive and handle personal and private information about clients, partners, and the company. This policy is designed to set the rules that will protect this information from exposure.

## Policy elements

Information that the company considers confidential and proprietary is undisclosed, valuable, expensive and/or easily replicated. More specifically, information that is classified as confidential includes:

- Customer lists (existing and prospective)
- Data of Customers/Partners/Vendors
- Trade secrets
- Private deals
- Unpublished financial information
- Processes, methods, and know-how
- Patents, formulas, or new technologies
- Pricing/marketing and other undisclosed strategies or tactics
- Unpublished goals, forecasts, or initiatives that are marked as confidential
- Data entrusted to the company by external parties
- Documents, processes, or other elements explicitly marked as confidential
- Any other knowledge acquired by employees during their employment

All these types of information must be protected for different reasons – some may be legally binding (e.g. sensitive data) and some constitute the backbone of the business and give it a competitive advantage (e.g. business processes). The disclosure of some kinds of information may expose the company to increased risk such as specific trade secrets, while for others the result could be the loss of important partners or reputation. In the course of their employment, employees will have various levels of authorised access to confidential information so as to conduct their business. When they do so, the following rules strictly apply:

- No amount of information will be disseminated to anyone outside of the organization
- The disclosure of information inside the organisation will be limited to those with authorised access and legitimate reason to require that information
- The information will not be used for the personal benefit or profit of the employee or any other except the company
- The employee will have access only to the amount and type of information required for the completion of their job responsibilities and no more
- Employees must limit to a minimum the occasions when they take confidential information out of the office
- When perusing or sharing information through electronic means, all precautionary safety measures must be in effect

- Confidential information must not be left unattended or unlocked
- Unauthorised replication of information is prohibited
- All hard copies of confidential documents must be shredded when no longer needed
- Upon separation of employment, all confidential information must be returned or deleted from the employee's electronic devices
- The company will take measures to ensure that confidential information is well protected. Those measures include but are not limited to:
  - Electronic information will be encrypted
  - Databases will be protected with all available security measures
  - Paper documents will be safely stored and locked
  - Authorisation of access will be carefully controlled, usually by senior management
  - Employees may need to sign non-compete and/or non-disclosure agreements
- Confidential information as described above may occasionally have to be disclosed for legitimate reasons, e.g. upon request of a regulatory body or for business purposes. In such cases, a strict procedure must be followed that includes the explicit consent of parties involved (unless they are faced with criminal charges) and the disclosure of only relevant information and no more.

## Disciplinary Consequences

The company places great importance in this policy. Any non-conformity will bring about disciplinary and, possibly, legal action. The company is prepared to terminate any employee who wilfully or regularly breaches the confidentiality guidelines for personal profit. Serious offences such as theft of information, illegal disclosure of sensitive data etc. will be grounds for immediate for-cause dismissal and may also involve legal consequences.

Any unintentional breach of this policy will be thoroughly investigated and will be punished appropriately depending on its magnitude and seriousness. This policy is binding even after the separation of employment.

***This policy is reviewed and revised at regular intervals, not less than annually, to ensure that it is relevant, up to date and fit for purpose.***

**Signed:**



**Mike Clancy**

**Group Managing Director**

**9 January 2023**