POLICY

CONFIDENTIALITY

REVISION LOG / HISTORY

Revision	Prepared by	Released Date	Change Description
1.0	Ddary Gao	2023/09/01	New release

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INTRODUCTION

Senergy Technical Services Limited and its affiliated entities (hereinafter referred to as STS) is committed to protecting the confidentiality of information it collects, stores and manages, and to keep those with whom the company deals informed about its practices.

In STS, confidential information means all non-disclosed information, including but not limited to employees' personal information, proprietary information, third parties' information and relevant insider information.

1 PURPOSE

This policy is established to describe the confidentiality requirements set within STS, including requirements applicable to employees, contractors, any other persons working for or on behalf of STS and any other stakeholder, and to protect and maintain confidentiality information in the company's possession, custody and control.

2 APPLICABILITY

This policy is applicable to all employees and other STS' stakeholders, including shareholders, board members, investors and contractors, who may have access to confidential information.

3 REFERENCES

00-POL-1010-EN	Employee Code of Conduct
00-POL-0170-EN	Personal Data Protection Policy
00-POL-0001-EN	Whistleblower Protection Policy
00-SOP-0040-EN	Confidentiality Control Procedure

4 TERMS AND DEFINITIONS

CONFIDENTIALITY

Confidentiality refers to a state when it is intended or expected by someone to keep the information secret, it implies the relationship of confidence between the organization and individuals.

NON-DISCLOSURE

Non-disclosure is the ethical principle or legal right that a party will hold secret of all information relating to another party, unless another party gives consent permitting disclosure.

PERSONAL INFORMATION

Personal information is an information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

PROPRIETARY INFORMATION

Proprietary information means trade secrets, confidential knowledge, data or any other information of the company.

THIRD PARTY INFORMATION

Third party information means confidential and proprietary information received by STS from a third party.

INSIDER INFORMATION

Insider information is the non-public information only known within company internal employees holding commercial value to the company or industry.

USE AND DISCLOSURE

It should be noted that ‘use’ and ‘disclosure’ are separate practices, with ‘use’ being the handling or management of information within STS, whereas ‘disclosure’ is when information is released from our control to another individual or entity.

5 RESPONSIBILITIES

STS EMPLOYEES

It is the responsibility of all STS employees to protect personal information and keep confidentiality of information owned, or otherwise managed by the company, whether information belongs to STS or to another party. STS employees shall also report on breaches or attempts of breach of this policy.

STS

It is the responsibility of STS to establish relevant confidentiality polices and processes in accordance with laws and regulations requirements, and communicate with employees to make them aware of confidentiality requirements.

OTHER STS STAKEHOLDERS

It is the responsibility of STS stakeholders to keep confidential and secure the information received from STS and may use it only for the aligned purposes, unless otherwise authorized by STS or applicable laws and regulations.

6 PRINCIPLES

Information is a very important asset of the company but also of STS' business partners; it may relate to the company's operations and management, competitive advantages, privacy of employees, business secrets, etc.

STS is committed to respecting and complying with the confidentiality requirements of personal and company information and ensuring compliance with applicable information protection laws and regulations.

7 STATEMENTS / REQUIREMENTS

7.1 GENERAL MATTERS

STS recognizes the rights of its employees to maintain confidential information and to have the information administered in ways which they would reasonably expect. The information includes but is not limited:

a) Personal information
b) Proprietary information
c) Third party information
d) Insider information

STS complies with applicable laws and internal policies to respect data privacy and protect the personal data of employees and business partners. STS has implemented a personal information protection policy, the details of which are published in the document Personal Data Protection Policy (00-POL-0170-EN).

STS requests that all employees and stakeholders strictly keep confidential and must not disclose, use, lecture upon or publish any of the proprietary information of the company.

STS holds third-party information in the strictest confidence. STS will sign a Non-disclosure Agreement (NDA) commitment with business partners not to disclose relevant information to any other third parties.

STS takes appropriate steps to assure that the information that employees and stakeholders often obtain, or have possession of, proprietary confidential or business-sensitive, is strictly safeguarded. STS opposes employees seeking benefits through disclosure of insider information concerning STS business.

Employees and stakeholders have the obligation and responsibility to protect all information to not be leaked; once employees find that any information presents a risk to be leaked, they shall inform the company management and actively take actions to stop all risks of information being leaked.

Employees and stakeholders shall not, during the period of their employment or at any time after its completion or termination, make any copy, record or memorandum of any confidential information.

7.2 IMPLEMENTATION REQUIREMENTS

To ensure that all STS employees and stakeholders understand and adhere to the principles of confidentiality policy and avoid the disclosure of information, the following requirements must be met:

7.2.1 Collection of information

STS collects information for the purpose of delivering its services, administering processes associated with service delivery, monitoring or evaluating the services which STS provides, etc.

STS also collects personal information from employees for the purpose of administering their employment conditions.

STS collects relevant information through the following methods, which include but are not limited to:

a) Interviews
b) Registration or application procedures
c) Online or electronic registration
d) Communication
e) Questionnaire surveys
f) Telephone, etc.

7.2.2 Use and disclosure of information

STS only uses the information for the purposes for which it was given to the company, or for purposes which are related to one of its services. STS may also disclose information to other external organizations such as the clients, funding bodies, contractors who work for STS, other regulatory bodies, etc.

Any details of the information collected will not be disclosed to any other person or agency external to STS without the written consent or unless required or authorized by law.

7.2.3 Security and access to information

STS ensures that safeguards are in place to protect the information it administers against loss, interference, unauthorized access, inappropriate disclosure, modification or other misuse. These safeguards include reasonable physical and technical steps for both electronic and hard copy records. Some of these include, but are not limited to:

a) Securing information in lockable storage cabinets
b) Not storing personal information in public areas
c) Restricting physical access
d) Positioning electronic equipment so that they cannot be seen or accessed by unauthorized persons, and/or
e) Using passwords, different levels of information systems access, anti-viral software and firewalls to restrict unauthorized use.

Requests to access personal information are required in writing and need to be submitted to the relevant Managers.

7.2.4 Training and awareness

Awareness training shall be conducted to educate employees and stakeholders about the importance of confidentiality and the proper handling of confidential information.

7.2.5 Reporting

If an employee or a stakeholder of the company is dissatisfied with the conduct of a colleague regarding privacy and confidentiality of information, the matter should be raised with the staff member's direct supervisor. If this is not possible or appropriate, the employee shall follow the steps indicated in the Whistleblower Protection Policy (00-POL-0001-EN).

If anyone is not satisfied with the complaint management, he/she can report his/her concerns to STS Top Management.

7.3 BREACH OF POLICY

Any person, including employees and stakeholders who are deemed to have breached privacy and confidentiality standards set out in this policy may be subject to a warning, disciplinary action or legal consequences. It should be noted that the employee's obligation with respect to confidentiality survives the termination of his employment with STS and stakeholders' obligations shall survive the termination of the cooperation or contract with STS.

7.4 REVIEW AND CHANGES

To ensure that the policy remains relevant and effective, STS shall conduct periodic reviews and control the revision process. Reviews shall consider changes to STS' operating environment, legal and regulatory requirements, feedback from stakeholders, and experience in implementing the policy.

7.5 CONSULTATION

The company expects all employees and stakeholders to comply with this policy in order to ensure the privacy of employees and business secrets are not disclosed. By adhering to this Confidentiality Policy, we can maintain the trust of our business partners, protect our business interests, and safeguard sensitive information from unauthorized access or disclosure.

When in doubt about compliance with the confidentiality policy and applicable laws, employees and stakeholders shall seek guidance from the person responsible for Legal, Compliance & Governance or the appointed personnel.