# Confidentiality Policy

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## 1. POLICY STATEMENT

Al Taresh Business Men Services LLC ("**Al Taresh**" or the "**Company**") places a high value on its responsibility to maintain confidentiality, both in relation to its own business information and information it holds about service users, its employees and third parties.

This policy ("**Policy**") contains guidelines for ensuring that all our employees understand the types of information which may be regarded as confidential and the nature of their duty to keep information confidential. Further, it explains how employees can avoid unlawful disclosure of confidential information.

This Policy has been approved, and is issued by, the Al Taresh Managing Partner, Mahmoud Al Ruweili, (the "Managing Partner").

Any queries regarding this Policy should be directed to the Managing Partner.

## 2. PURPOSE

The purpose of this Policy is to set out Al Taresh requirements in relation to maintaining confidentiality in respect of information it receives or generates as a result of its business activities.

It is of primary concern that employees and all people who carry out the business activities of Al Taresh are aware of the importance of ensuring that information is kept confidential.

## 3. POLICY OBJECTIVE

The aim of this Policy is to:

(a) Clearly express the objective of Al Taresh in maintaining strict adherence to the duty to preserve confidentiality within its business;

(b) Maintain the integrity of Al Taresh;

(c) Protect the reputation of Al Taresh;

(d) Communicate Al Taresh commitment to best practice; and

(e) Assist employees in understanding Al Taresh and their legal duties.

This Policy should be read in conjunction with all other relevant Al Taresh policies.

## 4. APPLICATION

This Policy is applicable to all employees of Al Taresh and extends to all other people who carry out our business activities and who act upon the instructions of Al Taresh. Those other people include, for example:

(a) temporary staff;

(b) sub-contracted staff;

(c) consultants;

(d) contractors; and

(e) secondees.

This is not an exhaustive list, and all people who undertake any kind of work for Al Taresh will be required to have read and understood the requirements set out in this Policy.

For the purpose of this Policy, we collectively refer to all classes of employees and other people as employees ("**Employee**" or "**Employees**").

## 5. COMPLIANCE WITH LAWS AND REGULATIONS

The United Arab Emirates has established a legal framework of laws, regulations, decrees and resolutions which apply on a Federal and/or local Emirate basis. Al Taresh has identified those laws which are applicable to its business. This Policy has been carefully drafted to ensure that the arrangements in place for the issues discussed within the Policy, insofar as they impact on the way in which business is conducted, comply with those laws. Accordingly, all Employees must comply with the terms of this Policy, which will be updated as necessary, following any relevant legal change.

## 6. LEGAL DUTY TO PRESERVE CONFIDENTIAL INFORMATION

Every business holds information it regards as confidential. Employees require access to this information in the course of their employment.

The UAE Civil Code requires that employees must keep the information of Al Taresh confidential. This duty prevails both during and after the employee's contract of employment has been terminated.

The UAE Penal Code provides that it is a criminal offence for an individual to use third party information without consent for his own or another's advantage where that information was gained as a result of the individual exercising his profession, craft or art (in other words, during the course of employment).

An Employee shall be prohibited, both during and after the end of the period of service (howsoever arising), from disclosing confidential information, without the prior written approval of Al Taresh, and shall return all documents and information belonging to the Company or any relevant third party to whom the Company may owe a duty of confidentiality upon demand and in any event at the end of service (even if the information is not classed as confidential) and shall not retain any copies of such documents or information.

Employees must at all times ensure that they comply with the terms of this Policy and UAE laws while accessing and processing information.

## 7. THE DUTY REGARDING CONFIDENTIAL INFORMATION

7.1. The overriding duty to ensure confidentiality provides that:

(a) It is the responsibility of all Employees to maintain the confidentiality of all hard-copy and electronic financial, personal, sensitive, administrative information and intellectual property rights, that they may become aware of in the course of their duties;

(b) Employees may be required to sign a declaration confirming they understand their legal duties and the requirements of this Policy and all other policies issued by Al Taresh;

(c) Any Employee who is found to have breached this Policy or any legal duty relating to confidentiality, will be subject to disciplinary action, which may include termination of employment; and

(d) At any time and in any event upon the conclusion of their employment, all Employees shall return any confidential documents or information in any format, to their immediate supervisor/manager or otherwise as directed by Al Taresh. Access to any confidential information may be terminated at any time at the discretion of Al Taresh.

7.2. Any information which Al Taresh has not made public, internally or externally, should be considered confidential. Examples include, but are not limited to:

(a) Any information relating to service users;

(b) Personal information relating to Employees;

(c) Information relating to the procedures or policies of Al Taresh;

(d) Legal information (which includes, but is not limited to, any legal advice or opinions addressed to or received from or instructions issued by the legal advisers/departments);

(e) Financial information;

(f) Information relating to bids;

(g) Information relating to the business dealings of a third party to whom Al Taresh might reasonably be considered to owe a duty of confidence;

(h) Information relating to contracts/agreements;

(i) Minutes of meetings;

(j) Printed and/or electronic email copies;

(k) Any information classified by any Directors or senior managers as confidential information.

7.3. Certain types of information are regarded as sensitive information, such as where it relates to Company business activities, including business plans or copyright information. Loss, misuse, modification, or unauthorized access to sensitive information can adversely affect the security of the Company.

7.4. Sensitive information refers to information whose disclosure may harm the business. Such information may include:

- trade secrets;
- Business plans;
- sales and marketing plans;
- copyright information;
- customer and supplier information; and
- financial data.

7.5. All types of personal or confidential information (including sensitive information) must be protected at all times. Al Taresh is committed to respecting private information which it handles in the course of its business.

7.6. If you handle personal or private information you must ensure that:

(a) You are aware of and comply with this Policy;

(b) You comply with any relevant contractual obligations;

(c) You collect, process, and use such information for legitimate business purposes only;

(d) You do not use such information for your personal gain or that of anyone else;

(e) You limit access to those who have legitimate business purposes for seeing the information; and

(f) You take reasonable care to prevent unauthorized disclosure.

## 8. CONFIDENTIAL INFORMATION: HOW TO COMPLY

8.1. The following advice is intended to guide Employees regarding compliance with their duties and with the law. The list is not intended to be exhaustive. Al Taresh will investigate any potential

breach of confidentiality and may implement disciplinary procedures in accordance with its disciplinary procedures. Breach of confidentiality may lead to termination of employment.

8.2. Access to information systems:

(a) The database administrator ("**Database Administrator**") is responsible for managing the information security role (as further described in the Information Security and Data Protection Policy) and will have overall control of access to information systems.

(b) Access to Al Taresh information systems will be determined by authorized managers ("**Manager**" or "**Managers**"). The Manager or an official designee shall be responsible for determining and assigning appropriate employee access to information systems which pertain to their specific job function within Al Taresh. Where appropriate, the Company may require that Employees sign an appropriate confidentiality agreement to permit access to be granted;

(c) The Database Administrator will prepare computer passwords for each Employee to whom access has been granted. Computer access passwords will be assigned on an individual basis and must not be shared with anyone. Employees must take all reasonable care to ensure that no other employee obtains access to their computer or obtains their password, regardless of whether or not this results in unauthorized access to confidential information;

(d) Each Employee should ensure that they adhere to a 'clean desk' policy, and lock their computer when away from their desk, during breaks or meetings, and that the computer is fully logged-off at the end of each working day;

(e) When creating and circulating emails, each Employee should consider, and take steps to limit, the potential for inadvertent or unlawful disclosure of confidential information;

(f) All Employees are required to report any incidence of improper or potentially unlawful use of electronic information to their Manager or to their respective direct line managers, and the Manager of Information Systems;

(g) Upon the conclusion of employment, the Manager and Database Administrator are responsible for removing access to all applications for the Employee;

(h) An Employee shall not disclose confidential information to colleagues or external parties where there is no legitimate business reason for doing so. For example, social media should never be used for any discussions relating to matters which might reasonably fall within the definition of Confidential Information in this Policy;

(i) It is recognized that Employees may require access to confidential information in order to carry out their duties and responsibilities. Access shall be available at the level necessary for the Employee to carry out specified job functions (see 6.2 above). Employees shall not share information with others who are not involved in the specified job function; and

(j) Employees must be particularly careful when engaging in conversations at conferences, informal occasions or outside the workplace. Confidential conversations should be held out of earshot of those who should not be privy to the information being discussed. For example, these matters should ordinarily not be discussed in lifts, corridors or in public places.

## 9. PERMITTED DISCLOSURES TO THIRD PARTIES

When a disclosure of an information to a third party is required for business purposes, an Employee must ensure that appropriate commercial confidentiality agreement, consent or authority is in place, take appropriate precautions and ensure that the process is fully documented in accordance with any Al Taresh procedures from time to time. If further clarification is required an Employee must seek approval from a Manager or the Human Resources Department. Where appropriate, the matter may be escalated for the approval of

the legal adviser/department. Where advised, the Employee may be required to obtain a signed confidentiality agreement from the third party.

## 10. DISCLOSURES BY WAY OF PUBLICATIONS OR TO THE MEDIA

10.1. No Employee other than an expressly authorized member of management is permitted to make any disclosures by way of publications or to the media. Al Taresh shall have absolute discretion as to the Employees who may be designated as authorized for this purpose.

10.2. No Employee is permitted to engage in the act, or cause or permit others to so engage, directly or indirectly in the act of making confidential information belonging to Al Taresh (or in respect of which the Company owes a duty of confidence to a third party, as defined above) available to the public either in a verbal, printed or electronic form.

10.3. For the avoidance of doubt, the term "publications" includes, but is not limited to, any hard-copy or electronic copy of a book, magazine, newspaper, document, or any kind of networking service (including social networking and political networking services), in which information or stories are published and/or discussed.

10.4. No Employee is permitted to make any information relating to Al Taresh public by making any unauthorized announcement or statement or comment, or giving any opinion, to any media institution, or through any kind of networking services (including social networking and political networking services).

10.5. All contact by the media must be referred to the Marketing & Communications Manager and the matter will be handled by an authorized Employee.

## 11. DOCUMENT RETENTION

All documents created by under this Policy shall be retained in accordance with the Document Retention Policy.

Failure to adhere to document retention and destruction policies may lead to inadvertent unauthorized destruction and/or disclosure of confidential information.

Employees shall not make copies of or retain any record or document for private use. Save in exceptional circumstances, where duly authorized in writing, originals of documents and records must not be removed from Al Taresh offices.

The legal advisers/departments may issue instructions regarding the retention of certain documents because of actual or impending litigation or inspections by regulatory authorities. Employees must comply with these instructions to prevent the Company from being exposed to undue legal or regulatory risks.

## 12. VIOLATION OF THIS POLICY

Al Taresh will investigate any potential breach of confidentiality (whether deliberate or inadvertent) and may implement disciplinary procedures in accordance with its disciplinary procedures, which may in turn lead to the termination of employment.

Deliberate disclosure of confidential information in exchange for a gift, inducement, bribe, or other gain, or perceived gain, is prohibited, and will be investigated in accordance with disciplinary procedures. Such disclosures, if proven, will be treated as gross misconduct resulting in the termination of employment.

Breaches of the UAE Penal Code may be dealt with by the relevant authorities and criminal sanctions may be imposed on an Employee.

## 13. DECLARATION AND AFFIRMATION

Every Employee shall acknowledge that they have read, understood and will comply with this Policy and have submitted a signed declaration confirming this. Al Taresh may request that you refresh the declaration from time to time, when amendments to this Policy are made, or as reasonably required.

## 14. POLICY REVIEW

This Policy will be reviewed on an annual basis and changes made as appropriate.

## 15. DOCUMENT REVISION

| Revision | Date | Summary of Modifications | Released by |
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| 1 | April 2022 | Initial Version | Managing Partner |
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