

AJM GROUP

Report - Confidentiality

What is Confidentiality?

Confidential or proprietary information is secret, valuable, expensive and not easily replicated. Sharing confidential information can lead to the loss of business clients or be misused to commit illegal activity. The disclosure of sensitive information can also lead to a loss of employee trust, confidence and loyalty.

This report is designed to explain how we expect employees to treat confidential information. Employees will unavoidably receive and handle personal and private information about clients and partners of the AJM Group and this information must be well-protected.

Examples

Confidential workplace information can generally be broken down into three categories: **employee information, management information, and business information.**

Here are some common definitions of confidential information:

Employee Information: This can broadly be considered as “personal identifying information” (e.g., PAN number, Aadhar information, driver’s license number, passwords)

Management Information: Confidential management information includes discussions about employee relations issues, disciplinary actions, salaries, promotions, impending layoffs, terminations and investigations of employee misconduct. While disclosure of this information isn’t always “illegal,” it can seriously harm the workplace environment.



Business Information: Confidential business information is often referred to as “proprietary information” or “trade secrets.” This information is not publicly available and if made available to competitors could seriously damage the business and profits. This could include data on prototypes, software, drawings, systems, processes, internal and external communications, and test results.

Other examples of confidential information include:

- Unpublished financial information
- Customer data
- Pricing
- Patents, formulas or technologies in development
- Customer lists (existing and prospective)
- Data entrusted to the company by external parties
- Documents explicitly marked confidential

Corporate Pledge

We shall not disclose confidential, proprietary, or sensitive information.

Employee Adherence

This policy affects all employees who may have access to confidential information.

Employees handling confidential information must take certain steps to ensure the information is protected sufficiently. A confidentiality clause is included as part of your employee contract with the AJM Group and may be enforced if necessary.

Here are some measures employees can adopt to ensure the information is secure:

1. Lock confidential information at all times; refrain from leaving such information visible on your computer when you leave your workstation



2. Shred confidential documents when they're no longer needed
3. Only disclose information to authorized employees or when absolutely necessary (after obtaining appropriate permissions)
4. Keep confidential documents inside the company's premises
5. Mark all confidential documents as "Confidential"

Employees are obliged to return any confidential files and delete them from their personal devices on leaving the company. It is possible to breach confidentiality even after leaving the AJM Group.

Legal Compliance

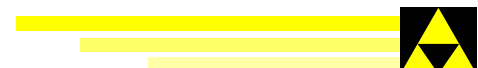
Confidentiality is governed by the **Indian Competition Law** and monitored by the **Competition Commission of India (CCI)**. India also has the **Information Technology Act, 2000** which is designed to protect all confidential digital information. The AJM Group is fully compliant with these laws and will seek to prosecute any offenders within and outside the Group companies according to the provisions under these guidelines.

Reporting Violations

Employees who don't respect or adhere to the confidentiality policy may face disciplinary and possible legal action. Breaches can result in suspension or termination and you could even be prosecuted under India's Contract Law. You are required to report any breach of confidentiality to a member of the Ethics Committee or your direct reporting manager.

AJM Group Business Ethics Policy: Section Related to Confidentiality

We will not disclose any confidential information shared with us by vendors or buyers for business purposes, including intellectual property, trade secrets, and other confidential, proprietary, and sensitive information. We will strive to safeguard all confidential information with utmost care.



Key Takeaways

Any information that is secret, expensive, or cannot be easily replicated is confidential information.

Employees handling confidential information are required to take necessary steps to ensure the information is secure.

It is possible to breach confidentiality even after leaving the organization.

