

## Confidentiality Policy

### AIMS & OBJECTIVES

Employees and personnel of Caspian Engineering Solutions have a duty of maintaining the confidentiality of information received by them in the course of their employment or engagement. This Confidentiality Policy documents the confidentiality and non-disclosure duties and obligations of the employees and personnel of Caspian Engineering Solutions. The employees and personnel of Caspian Engineering Solutions will, in the course of their employment and engagement, become aware of and possess information of the Caspian Engineering Solutions or of third parties disclosed to the Caspian Engineering Solutions that is not generally known. This may include information which if disclosed could jeopardise the interests of the Caspian Engineering Solutions. It may also include commercial trade secrets disclosure of which could harm the interests of the Caspian Engineering Solutions. All employees and personnel of the Caspian Engineering Solutions have a duty to keep such information strictly confidential and to use it only for the proper purposes in accordance with the law.

### CONFIDENTIAL INFORMATION

Confidential information includes any information which is not publicly known. It can concern technology, business or finance. It includes information which is commercially valuable such as trade secrets or business information, as well as personal information. Examples of confidential information include but are not limited to: any document, discovery, invention, improvement, formulations, plans, ideas, accounts, data, reports, drafts of documents of all kinds, correspondence, client information, lists and files, decisions, information about employees, strategies, drawings, recommendations, designs, office precedents, policies and procedures, budget and financial information in any form, i.e. physical, electronic, electromagnetic or otherwise.

### GENERAL PRINCIPLES

- Caspian Engineering Solutions recognises that colleagues gain information about individuals and organisations during the course of their work or activities. In most cases such information will not be stated as confidential and colleagues may have to exercise common sense and discretion in identifying whether information is expected to be confidential. This policy aims to give guidance but if in doubt, seek advice from your line manager.
- Colleagues are able to share information with their line manager in order to discuss issues and seek advice.
- Colleagues will avoid exchanging personal information or comments about individuals with whom they have a professional relationship.
- Colleagues will not disclose to anyone, other than their line manager, any information considered sensitive, personal, financial or private without the knowledge or consent of the individual, or an officer, in the case of an organisation.
- There may be circumstances where colleagues would want to discuss difficult situations with each other to gain a wider perspective on how to approach a problem. The organisation's consent must be sought before discussing the situation, unless the colleague is convinced beyond doubt that the organisation would not object to this. Alternatively, a discussion may take place with names or identifying information remaining confidential.
- Where there is a legal duty on Caspian Engineering Solutions to disclose information, the person to whom the confidentiality is owed will be informed that disclosure has or will be made.

Jamaladdin Aliyev  
Director

