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CONFIDENTIAL INFORMATION POLICY

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O2 1.00 FULL TITLE OF THE POLICY

The full title of this Policy shall be "Policy Concerning Confidential Information".

O3 2.00 SUMMARY OF THE POLICY

This Policy relates to the creation, use and protection of Confidential Information belonging to the Company or to third parties.

O4 3.00 OBJECTIVES OF THE POLICY

The objectives of the Company in establishing this Policy are the following:

- a) to lay down a regulatory framework regarding the purpose of the Policy;
- b) to ensure that individual and group behaviour is consistent with the Company's expectations and with the requirements of any applicable legislation and regulations;
- c) to ensure adequate use of the Company's Confidential Information, so that the Company's operations are carried on in a manner consistent with its mission and tend to constantly maintain, enhance and promote its image and reputation;
- d) to provide, encourage and maintain within the Company an environment which is healthy, peaceful, safe and respectful of collective and individual rights;
- e) to encourage positive participation by those affected by this Policy during the planning, design and execution of the Company's operations; and
- f) to provide those who are affected by this Policy with the means and tools to fulfill their tasks, to perform their activities and to assume their responsibilities in a fully effective manner.

O5 4.00 SCOPE OF THE POLICY

4.01 Persons Affected

This Policy shall apply to any Employee of the Company, including:

- a) any Employee working on the premises of a client of the Company or at any location other than where the Company carries on its operations;
- b) any Employee who creates or uses Confidential Information in the course of a contract, an exchange of services, a mandate, a training period, a cooperative undertaking or otherwise; and
- c) any Employee coming into contact with Confidential Information.

4.02 Activities and Property Involved

This Policy shall also apply to:

- a) the departments, administrative units, branches and subsidiaries of the Company;
- b) the Company's operations; and
- c) the systems, Equipment and resources of the Company.

O6 5.00 DEFINITIONS OF WORDS AND EXPRESSIONS USED IN THE POLICY

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5.01 Usual Meaning

Words and expressions used in this Policy shall generally keep their usual meaning.

5.02 Other Company Documents

Several words and expressions used in this Policy are defined in other Company Documents (e.g.: *vocabulary, guidelines, standards, methods, etc.*), such as (*indicate the exact title of the relevant documents*).

5.03 Specific Definitions

For purposes of this Policy and unless the context obviously indicates another meaning, the following words and expressions shall have the following meaning:

- **"Disclosure"**: shall include, without limitation:
 - a) making Confidential Information available to a person;
 - b) disclosing Confidential Information to a person, whether verbally or in writing; and
 - c) granting permission to a person to consult or take cognizance of Confidential Information;
- **"Documents"**: shall include, without limitation, all information elements in whatever form and on whatever medium whatsoever, including, without limitation, correspondence, notes, books, plans, maps, drawings, diagrams, pictorial or graphic works, photographs, films, microforms, sound recordings, videotape recordings, machine readable records, and any copy thereof;
- **"Employee"**: shall mean any person employed by the Company, whatever his position in the hierarchy (officer, manager or employee), his type of remuneration (salary, commissions, fees, etc.) or his status (regular, part-time, on call, etc.) may be;
- **"Company"**: shall mean (*indicate the Company's name*);
- **"Equipment"**: shall include, without limitation, all equipment for the following purposes:
 - Internet access;
 - e-mail;
 - computer;
 - telephone;
 - telecopier;
 - photocopier; and
 - intranet access;
- **"Confidential Information"**: shall include all information which:
 - is confidential:
 - by its very nature;
 - at the request of the person Disclosing such information; or
 - as a result of a presumption which the Employee draws or should draw due to his position or the particular circumstances;
 - whether or not its tangible representation bears the legend "confidential" or any other similar legend;
 - originates from the Company or from any client, supplier, associate or third party;
 - is presented in any form whatsoever, including verbally, in writing, in electronic form or otherwise;
 - is supplied, Disclosed, communicated or otherwise transmitted to the Employee, or is created, designed or developed by the Employee or by a group of persons of which the Employee forms a part; or
 - relates to the Company or to its clients, suppliers or associates, or to third parties, or

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