

A K R O S

Akros Index Engineering

Confidentiality Policy

Akros Index Engineering Inc.

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1. Overview

1.1. Policy for Confidentiality

Akros Index Engineering (“AIE” or the “Company”) is the benchmark administrator for benchmarks that are operated under the Akros Indices brand.

Employees and personnel of AIE and its subsidiary and associated companies have a duty of maintaining the confidentiality of information 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 AIE.

The employees and personnel of AIE will, in the course of their employment and engagement, become aware of and possess information of the Company or of third parties disclosed to the Company that is not generally known. This may include information which if disclosed could jeopardize the interests of the Company. It may also include financial trade secrets disclosure of which could harm the interests of the Company.

All employees and personnel of AIE have a duty to keep such information strictly confidential and to use it only for the proper purposes in accordance with the law.

2. Definition of Confidential Information

- 2.1. Confidential Information includes, but is not limited to, proprietary company information, client data, financial information, trade secrets, business strategies, marketing plans, employee records, and any other information that is not publicly available.
- 2.2. This policy also covers the protection of personal information of employees and clients as required by applicable privacy laws.

3. Responsibilities

- 3.1. All employees are responsible for maintaining the confidentiality of the Company's information and the information of the Company's clients and employees.
- 3.2. Managers and supervisors have an additional responsibility to ensure that their staff members understand and comply with this policy.
- 3.3. Third parties, including contractors and consultants, are required to sign confidentiality agreements and abide by this policy.

4. Access to Confidential Information

- 4.1. Access to confidential information should be on a need-to-know basis only and must be authorized by the relevant supervisor or manager.
- 4.2. Employees must not access, use, or disclose confidential information for personal gain or to benefit others outside the course of their work duties.
- 4.3. Unauthorized access or use of confidential information is strictly prohibited and may result in disciplinary action, including termination and legal consequences.

5. Confidentiality Agreements

- 5.1. All employees, contractors, and third parties who have access to confidential information are required to sign a confidentiality agreement upon joining the company.
- 5.2. The confidentiality agreement will outline the individual's obligations and responsibilities regarding the protection of confidential information.

6. Data Security

- 6.1. All employees must ensure that confidential information is stored securely, whether in physical or electronic form.
- 6.2. Physical documents should be kept in locked cabinets, and electronic files should be password-protected and encrypted when necessary.

- 6.3. Unauthorized duplication, reproduction, or removal of confidential information is strictly prohibited.

7. Reporting and Breach Notification

- 7.1. Employees must promptly report any suspected or actual breaches of confidentiality to their supervisor or the designated person responsible for handling such cases.
- 7.2. The Company will investigate all reported breaches and take appropriate actions to address the situation, including disciplinary measures and legal actions if necessary.
- 7.3. In the event of a data breach that may impact personal information, the Company will comply with all applicable laws and regulations regarding data breach notifications.

8. Training and Awareness

- 8.1. The Company will provide training and awareness programs to ensure that all employees understand the importance of confidentiality and their obligations under this policy.
- 8.2. The training will cover topics such as handling confidential information, data security, and the consequences of breaching this policy.

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