

## CONFIDENTIALITY CODE OF CONDUCT

### INTRODUCTION

Lambert operates in a highly competitive environment where a high proportion of our work is of a sensitive nature. The work typically relates to customers who are developing & marketing new products or variants and our involvement means we are exposed to and trusted with their proprietary knowledge. The customer's IP (intellectual property) is hugely valuable and therefore we must treat it in the strictest confidence.

Much of our own success is as a direct result of innovative thinking in terms of sales, design and project implementation. As such this knowledge must also be treated as highly confidential intellectual property and therefore it must be protected.

Additionally the way in which we treat and handle staff confidentiality is similarly important and this is so we can maintain legal compliance as well as trust and respect in the workplace.

Going forward our operations will therefore be bound by a strict code of conduct. Disclosing confidential information can destroy its value; prejudice Lambert and damage the trust clients have in us.

It must be understood by all staff that the implications for failing to comply with this policy are potentially hugely damaging to Lambert both in terms of legal penalties and reputation.

### CODE OF CONDUCT

#### Our Guiding Principal

We keep confidential information safe and make sure it never gets into the wrong hands.

Confidential information refers to any and all information and/or proprietary information or material belonging to or in the possession of any Lambert staff member. It may be oral, written, visual or in any other form.

It includes any information related to:

- Customer IP, technical information/documentation, know how, innovations, trade secrets, strategic planning, and sample parts or assemblies
- Supplier or employee information or agreements.
- Lambert financial information, business plans, projections or strategies, property, business practices and relationships, processes, systems, designs, know how or methods of operation.
- Specifications, pricing policies, marketing plans, costs or promotional activities.

#### What We Mean

Any improper disclosure or misuse of confidential information appertaining to either a customer or Lambert can have a huge impact on us. We must keep it safe, only share it on a "need to know" basis and only disclose it to a third parties on a confidential basis and with the appropriate documented authorisation to do so.

#### We Will Always:

- Make sure that if we are disclosing confidential information outside Lambert, we do so as part of an established confidential business relationship and with a signed confidentiality agreement in place.
- Make sure that our customers, suppliers and other 3rd parties protect Lambert confidential information.
- Make sure that we protect and keep safe all customer confidential information which is classed as work in progress within Lambert.

#### What We Will Never:

- Discuss confidential information in public where we could be overheard.
- Leave confidential or sensitive information in an insecure or public place.
- Use insecure technologies and methods when exchanging information.
- Share confidential information from or about a previous employer unless we are permitted to do so.
- Copy documents or materials containing confidential information unless we are permitted to do so.

W M Limbert  
Managing Director