

Confidentiality Code of Conduct

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 and marketing new products or variants and our involvement means we are exposed to and trusted with your 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.

1. Our Guiding Principles

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 and includes:

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

2. 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 third parties on a confidential basis and with the appropriate documented authorisation to do so.

3. We Will Always

- 3.1 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.

3.2 Make sure that our customers, suppliers and other 3rd parties protect Lambert confidential information.

3.3 Make sure that we protect and keep safe all customer confidential information which is classed as work in progress within Lambert.

4. We Will Never:

4.1 Discuss confidential information in public where we could be overheard or leave confidential or sensitive information in an insecure or public place.

4.2 Use insecure technologies and methods when exchanging information or share confidential information from or about a previous employer unless we are permitted to do so.

4.3 Copy documents or materials containing confidential information unless we are permitted to do so.

This statement has been approved and authorised by:

Name: **Warren M Limbert**

Position: Managing Director

Date: May 2017

Signature

