

POLICY FOR CONFIDENTIALITY

ESCO LIFESCIENCE MEDICAL & LABORATORY EQUIPMENT SERVICES L.L.C is the legal entity responsible for Inspection activities (hereinto referred to as Esco Lifesciences (the IB)) related to In-service Inspection services for Airflow velocity test (inflow and Downflow), HEPA filter leak test (supply and exhaust), Smoke pattern / visualization test, Site installation assessment / alarms verification, Light intensity test, UV light intensity test, Sound level test for Containment Devices Biosafety Cabinet (Class II A1, Class II A2, Class II B1, Class II B2); Containment Devices Laminar Flow Hood Vertical Horizontal, Chemical Fume Hood Ducted & Ductless (recirculating), Isolator; Thermostatic Devices- CO2 Incubator, IVF Incubator)- is committed to providing Inspection services whose data and information is confidential. No information given to or obtained by ESCO Lifesciences (the IB) will be shared with any other organisation or individual without the client's expressed permission.

"Confidential and or proprietary Information" shall mean and include any information disclosed by one Party (Disclosing Party) to the other (Receiving Party) either directly or indirectly, in writing, orally, by inspection of tangible objects (including, without limitation, documents, prototypes, samples, media, documentation, discs and code). Confidential information shall include, without limitation, any materials, trade secrets, network information, configurations, trademarks, brand name, know-how, business and marketing plans, financial and operational information, and all other non-public information, material or data relating to the current and/ or future business and operations of the Disclosing Party and analysis, compilations, studies, summaries, extracts, personal, sensitive or identifiable information, including Inspection results, reports and certificates about individuals or clients' (confidential information) or other documentation prepared by the Disclosing Party. Confidential Information may also include information disclosed to the Receiving Party by third parties on behalf of the Disclosing Party.

Confidential information includes, though not limited to:

- Inspection Observations, calculations, results, reports, Certificate
- Unpublished financial information
- Data of customers/partners/supplier
- Patents, formulas, or work technologies
- Contact list for current and prospective customer
- Data from external parties entrusted to u
- Pricing and marketing strategies
- Documents and processes that are explicitly classified as confidential
- Unpublished targets and business plans marked as confidential

ESCO Lifesciences (the IB) holds personal data about its personnel, Inspectors, Clients, Suppliers etc. which will only be used for the purposes for which it was gathered and will not be disclosed to anyone outside of ESCO Lifesciences (the IB) or the client without prior written permission from the client or ESCO Lifesciences (the IB) Top Management, as relevant. All data will be dealt with sensitively and in the strictest confidence internally and externally.

Technical Manager and his Inspection team receive and handle confidential information e.g. Inspection results, observations, non-conformities, reports, certificates about clients, partners, and other things. This information is well-protected for two reasons:

- It is legally binding (e.g. sensitive customer data)
- It may serve as the backbone of our business, which gives us a competitive advantage (e.g. business processes, market secrets, etc.)
- It is as per the ISO 17020:2012 standard requirements.

ESCO Lifesciences (the IB)'s confidentiality policy explains how employees are expected to treat confidential information and consequences for inappropriate management of the same.

The policy affects all employees, board members, investors, contractors, and volunteers in the company who have access to confidential information. Confidential information is to be kept discreet because it is valuable and often sensitive. It can also be easily pirated or replicated, which is dangerous for business.

Employees including Inspectors should remember to:

- Keep confidential information locked at all times
- Shred confidential documents once they are no longer needed
- View confidential information only on secure devices
- Disclose confidential information to other employees only when it is necessary and authorized

POLICY FOR CONFIDENTIALITY

- Retain confidential documents within the company premises all the time unless there is a compelling reason to move them
- Soft copies- under protected folders, sometimes, under password protection.
- Computers and Laptops and associated Softwares should be password protected.
- Log-in ID and Passwords to be used.

Employees SHALL NOT:

- Use confidential information to advance a personal agenda
- Disclose confidential information to persons outside the company
- Store copies of confidential documents and files on insecure devices

Protection of Confidentiality Data

To ensure confidential information is well protected, ESCO Lifesciences (the IB) will:

- Store and lock paper documents
- Encrypt electronic information and safeguard databases through Log-in ID and Password protection (included within the Procedure for Control of Documents & Records- for Data Integrity & Security)
- Get our employees sign non-compete or non-disclosure agreements
- Condition access to confidential data on approval by senior management

Exceptions

Examples of legitimate grounds to disclose confidential information include:

- If a regulatory body requests it as part of a routine audit or legal investigation
- If ESCO Lifesciences (the IB) enters into a venture or partnership that requires disclosure of some information (within the legal framework)

In these cases, employees concerned should document the specific information that is needed and seek authorization. ESCO Lifesciences (the IB) should always be careful not to disclose more information than what is needed.

Where the Technical Manager feels confidentiality is breached the following steps will be taken:

- The Technical Manager shall raise the matter immediately with Top Management.
- The Technical Manager must discuss with the Top Management the issues involved in the case and explain why they feel confidentiality should be breached and what would be achieved by breaching confidentiality. Top Management should take a written note of this discussion.
- Technical Manager is responsible for discussing with the team what options are available in each set of circumstances
- Technical Manager is responsible for making a decision on whether confidentiality should be breached. If Top Management decides that confidentiality is to be breached then they should suitably inform the client representative.

Prospects of Disciplinary Action

Employees who defy the confidentiality policy will face disciplinary action, which may also entail legal action.

ESCO Lifesciences (the IB) will always investigate any breach of the policy and:

- Terminate employees who wilfully and regularly breach the guidelines for personal gain
- Punish even unintentional breaches of this policy depending on frequency and seriousness

The policy is binding to employees even after leaving employment.

Approved on 23rd September



XQ Lin,
CEO of Esco Group Companies