

V. Confidentiality

All employees including Directors, Senior Management of Best & Crompton shall respect the confidentiality of information acquired or obtained in the course of the performance of their duties and responsibilities.

The protection and safeguarding of confidential business information, trade secrets, and information about the clients of Best & Crompton are vital to Best & Crompton's interests and success. Employees are bound by the requirement of observing strict confidentiality at all times.

Employees who improperly use or disclose trade secrets, client information, or confidential business information will be subject to (i) disciplinary action, up to and including termination of employment and (ii) legal action, as may be permissible under law even if they do not materially benefit from the disclosed information.

Employees are therefore required to abstain from divulging information about Best & Crompton or its clients. The obligation to maintain strict confidentiality about Best & Crompton's services, clients and affairs is binding on each employee during and after his/her employment with Best & Crompton, to hold all files in strict confidence and inside Best & Crompton, and to refrain from commenting-even informally- about Best & Crompton's interests now and in the future.

To ensure maintaining confidentiality, as part of the employment terms, all the employees need to sign a confidentiality agreement as per Annexure A. They shall also submit annually a declaration of compliance of the Code to the Compliance Officer.