

### Purpose

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The Bailey Group of Companies “Bailey” has established this policy to set out expectations and standards for associates regarding the management and use of confidential information.

### Scope

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Bailey requires associates to keep all business information and relevant knowledge regarding the company operations confidential. Confidential information must not be used by associates for any purpose other than what is reasonable to complete their job duties and responsibilities during employment. Associates are expected to maintain confidentiality during their employment and after the end of the employment relationship.

If confidential information is not effectively protected, the operations and reputation of the company may be threatened and may suffer irreparable harm. These practices have been adopted because they have been deemed essential for the protection of the company and its business interests.

### Objective

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This policy is meant to provide associates with the information necessary to ensure that all information deemed confidential which pertains to the Bailey business and associates is not distributed or shared with others.

### Confidential Information

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Confidential information means all information created by, furnished by, received by, or accessible through Bailey, as well as information that is compiled, contributed, or developed by the associate that is related to actual or anticipated business, research, development, and manufacturing of the company, and that is not generally known to competitors or the public, nor intended for general dissemination. Confidential information includes information reduced to written, electronic, or recorded form, and information that meets the definition above whether marked as confidential or not.

Furthermore, confidential information includes but is not limited to:

- Associates, customers, and business partner data;
- Business, strategic, and human resources planning and strategies;
- Compensation planning, policies, and strategies;
- Financial information regarding the company;
- Any information or content marked as confidential;
- Personal information of associates, customers, vendors, contractors, and suppliers

Confidential information does not include:

- Information that is available to the public or industry competitors

### Disclosing Confidential Information

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Confidential information should only be shared with other associates within the organization as necessary for the completion of their job duties and responsibilities. It should not be presumed that other associates are aware of or have access to confidential information, therefore it should not be discussed openly.

Associates must not divulge, disclose, provide, or disseminate confidential information to any third-party organization or anyone not employed by Bailey, whether directly or indirectly, unless given express written authorization from a member of the executive team.

Associates who are neither official spokespersons nor permanently or temporarily designated spokespersons cannot, under any circumstances (including on a “no-names” or “off the record” basis), respond to external inquiries unless specifically asked to do so by a member of the executive team. All inquiries from external parties are to be referred to a member of the executive team.

### Protecting Confidential Information

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All reasonable efforts will be made to limit access to confidential information to only those who need to know the information, and those persons should presume that the information is to be kept confidential until it has been publicly disclosed by a Bailey spokesperson.

Associates will be granted varying levels of access to confidential information based on their role in the company. Associates are expected to only access confidential information to the extent necessary to complete their job duties and responsibilities.

All confidential information in physical and electronic format must be handled with the utmost care. Physical documents must be stored in locked files and cabinets when not in use and should not be removed from the company’s premises without the express written authorization from a member of the executive team. Electronic devices and databases containing confidential information must be password-protected and locked when not in use. Confidential information must never be replicated and transferred to personal or unapproved devices or platforms.

### Intellectual Property

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Any content or work created by associates during their employment with Bailey considered the property of the company. This includes any project, proposal, pricing list, customer list etc. . As they are property of the company, they cannot be reproduced by the employee for purposes other than their job duties with the company, or published by another source without express written authorization from a member of the executive team.

### Termination of Employment

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Following the end of the employment relationship, all confidential information in the associate’s possession, whether in written or electronic format, must be returned to their manager or destroyed at the discretion of the company. Any confidential information requiring destruction must be done in accordance with instructions received



## **Confidentiality Policy**

from the company, and must be confirmed with proof of destruction. Bailey reserves the right to request the return or destruction of confidential information in the employee's possession at any time.

### **Violations**

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Any report of a violation of this agreement will be investigated by Bailey. If it is found that this agreement has been violated, the associate will be subject to disciplinary measures up to and including termination of employment. Depending on the circumstances, the associate may also be subject to legal action. The company may seek legal remedies for the violation, including urgent injunctive relief or an associated claim for damages and legal costs.