

Confidentiality Policy

REVISION HISTORY

This Confidentiality Policy is reviewed to ensure continuous relevance to the systems and processes that it describes and a record of contextual additions or omissions is given below :

Ver. No.	Description of Change(s)	Effective Date
1.0	This is a new Policy	22-FEB-21
1.1	Reference to other SOP is added	03-MAY-24
1.2	Review of the Policy	29-APR-24
1.3	Review of the POL: administrative update	23-MAY-2026

1.0 INTRODUCTION AND PURPOSE


We designed our company confidentiality policy to ensure that all confidential, competitively sensitive and/or proprietary information about Novellas Healthcare, our customers, suppliers, business partners and other third parties is properly protected.

2.0 SCOPE

Our confidentiality policy is applicable to all managers and employees, contractors and freelancers (“Staff”) of Novellas Healthcare and its affiliates and is communicated to all Staff throughout our organization via regular communication and/or training.

3.0 GLOSSARY of TERMS

POL	Policy
Confidential Information	The term “Confidential Information” shall mean all information that either party discloses to the other party, whether in writing, electronically, or orally and in any form (tangible or intangible), that is confidential, proprietary, or relates to clients or shareholders (each either existing or potential).
Staff	All people working for Novellas Healthcare including Managing Partners, managers and employees, freelancers and contractors.

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4.0 PROCEDURES

4.1 Policy Elements

Confidential Information is any information that a company has not disclosed or made generally available to the public. Common examples of confidential information are, but not limited to:

- Unpublished financial information
- Data of Customers/Partners/Vendors
- Patents, formulas or new technologies
- Strategic and business plans
- Inventions
- Product specific information
- Customer lists (existing and prospective)
- Candidate lists (existing and prospective)
- Data entrusted to our company by external parties
- Pricing/marketing and other undisclosed strategies
- Documents and processes explicitly marked as confidential
- Unpublished goals, forecasts and initiatives marked as confidential

Staff may have various levels of authorized access to confidential information.

4.2 What Staff should do

Anyone working with Confidential Information is personally responsible for ensuring that they are not read or handled by anyone who has no reason to do so.

Staff must :

- Respect the confidentiality of other companies’ information that is not in the public domain.
- Assume that all information about Novellas Healthcare and/or the client is confidential or competitively sensitive unless a clear indication has been given that the information has been publicly released.
- Always protect Confidential Information about Novellas Healthcare and/or the client, including outside of the workplace and working hours, and after employment or contract ends.
- Refrain from sharing Confidential Information to anyone outside Novellas Healthcare and/or the client including to family and friends, except when disclosure is strictly required for business purposes; even then, take all appropriate steps, such as signing a confidentiality agreement, to prevent misuse of the information.
- Even within Novellas Healthcare and/or the client’s company, only disclose Confidential Information to other Staff on a strict need-to-know basis (only when it is necessary and authorized).
- Take all the necessary steps to protect documents and IT devices containing Confidential Information when away from the workplace.

In addition Staff must :

- Lock or secure Confidential Information at all times.
- Shred confidential documents when they are no longer needed.
- Make sure they only view Confidential Information on secured devices.
- Storage of Confidential Information obtained via Novellas Healthcare and/or the client on personal devices should be avoided as much as possible. In situations that would enforce the Confidential Information to be viewed/stored on personal devices, it should be deleted as soon as possible.
- Only disclose Confidential Information to other Staff when it's necessary and authorized.

- Keep confidential documents inside our company's and/or the client's company premises unless it's necessary to move them. In this case explicit approval of the Novellas Healthcare General Manager and/or the Manager of the client is required.

When Staff stop working for Novellas Healthcare and/or the client, they're obliged to return any confidential files and delete them from their personal devices.

4.3 What Staff should not do

- Use Confidential Information for any personal benefit or profit.
- Disclose Confidential Information to anyone outside of Novellas Healthcare.
- Replicate confidential documents and files and store them on insecure devices.

4.4 Confidentiality Measures

Novellas Healthcare will take measures to ensure that Confidential Information is well protected.

Novellas Healthcare will:

- Store and lock confidential paper documents.
- Encrypt electronic information and safeguard databases.
- Manage folder permissions on the Novellas Healthcare Datastore to prevent unauthorized Staff access.
- Limit access to 'shared' email inboxes.
- Ask Staff to sign non-compete and/or non-disclosure agreements (NDAs)
- Ask for authorization by management to allow Staff to access certain Confidential Information
- Check with clients whether certain potentially sensitive/Confidential Information can be shared with Staff/third parties as needed.

4.5 Exceptions

Confidential Information may occasionally have to be disclosed for legitimate reasons.

Examples are:

- If a regulatory body requests it as part of an investigation or audit.
- If Novellas Healthcare examines a venture or partnership that requires disclosing some information (within legal boundaries).
- If there is a legal requirement to disclose that information.

In such cases, Staff involved should document their disclosure procedure and collect all needed authorizations. Staff is bound to avoid disclosing more information than needed.

Novellas Healthcare recognizes that additional occasions may arise where individual workers feel they need to breach confidentiality. Where Staff feels confidentiality should be breached, they should raise the matter immediately with their Line Manager and/or General Manager and/or Quality & Compliance Manager who will discuss the options available and decide whether confidentiality should be breached.

4.6 Breaches

A breach of confidentiality occurs when the data or information provided in confidence to Novellas Healthcare by a client is disclosed to a third party without the client's consent. While most confidentiality breaches are unintentional, clients can still suffer financial losses as a result. In case a breach of confidentiality is identified, Staff immediately informs the Line Manager who will escalate the issue to the General Manager and Quality & Compliance Manager. A case-by-case escalation/corrective and preventive action plan will be defined (see also separate Novellas Healthcare SOP Data Breaches: SOP-NH-0012)

4.7 Disciplinary consequences

Staff who do not respect our confidentiality policy may face disciplinary and, possibly, legal action. Novellas Healthcare will investigate every breach of this policy.

Disclaimer: This confidentiality policy template is meant to provide general guidelines and should be used as a reference. It may not take into account all relevant laws and is not a legal document.



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SIGNATURE PAGE

The signatures below certify that this confidentiality policy has been authorized and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision

Date	Written, Reviewed and Signed by
2026-04-22	<u>Tom Torfs</u> _____ wo. 22 apr. 2026 13:42 CEST
	Tom Torfs, General Manager

Date	Written, Reviewed and Signed by
2026-04-22	<u>Inge Wyns</u> _____ Wed, Apr 22, 2026 1:15 PM CEST
	Inge Wyns, Quality and Compliance Manager

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