



## **CONFIDENTIAL INFORMATION POLICY**

Proper management of confidential information is critical to the success of Nu-Tech Roll Forming Inc. Employees are often entrusted with or become aware of trade secrets and proprietary information not generally known to the public. This type of information, whether or not subject to intellectual property rights, is considered confidential and is to be protected by all employees, retirees and other former employees. Any unauthorized disclosure of Company information is prohibited.

In addition, employees, retirees and other former employees are prohibited from using or attempting to use "inside" Company information for their own personal use, gain or advantage; or providing or "tipping" it to others.

The following important definitions apply:

1. *Confidential Information* – Confidential Information is any information not known to outsiders that has value to the Company or whose premature disclosure would help competitors or be harmful to the Company. It also includes information obtained from others that the Company is obligated to keep confidential. Examples of Confidential Information include:

- Actual and forecasted financial results
- Ideas
- Design data and information
- Processes, formulae, systems, programs and compilations
- Research and development
- Information regarding finances
- Actual or potential customer lists
- Plans
- New product information
- Strategies
- Information regarding legal proceedings
- Market share data

2. *Trade Secret* – A trade secret is confidential information given special legal protection if it is shown that the information generally is unknown,



economically useful and maintained as a secret within the Company. If otherwise confidential information is considered to be a trade secret, the Company can stop its use by someone who acquires it by improper means such as espionage, bribery, misrepresentation or breach of a confidential relationship.

In handling confidential information, employees must comply with the following guidelines:

- Except where it is a normal part of their job, employees may not use or disclose any Confidential Information of the Company. If there is a chance that the information is confidential, the employee's supervisor should be consulted before the information is used or disclosed.
- When it is necessary and appropriate to share confidential information, a confidentiality agreement shall be obtained whenever possible.
- Efforts should be made to avoid the leak of Confidential Information. Discretion should be used when discussing Confidential Information in situations where one might be overheard (e.g. on airplanes or in restaurants). Care should be taken to appropriately mark and store documents.