

CONFIDENTIALITY POLICY

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SQ-POL-008	00	30.08.2026	APPROVED

1. Purpose and Commitment

SafeQult Consulting recognises the protection of confidential information as a fundamental element of professionalism, trust and responsibility towards clients and business partners.

In providing our services, we may obtain access to information relating to our clients' operational, technical, organisational and commercial activities.

We are committed to protecting such information against unauthorised disclosure, use, access, loss or inappropriate distribution.

2. Scope of Confidential Information

Confidential information may include any non-public information received or obtained in connection with the delivery of services, regardless of its form.

This may include, in particular:

- technical and operational documentation,
- procedures, instructions and management systems,
- audit, inspection and assessment reports,
- analysis results and findings from assignments,
- photographs, recordings and other materials obtained at work locations,
- information concerning vessels, installations, equipment and operations,
- commercial, financial and contractual information,
- information concerning clients, contractors and personnel,
- personal data,
- information marked as confidential or which should reasonably be understood to be confidential from the circumstances in which it was disclosed.

3. Use of Information

Confidential information should be used only to the extent necessary to deliver agreed services or for other legitimate purposes associated with the business relationship.

It must not be used for personal benefit, for the benefit of other parties or in a manner that could prejudice the interests of the client or information owner.

Access to information should be limited to persons who genuinely require it to perform their responsibilities.

4. Disclosure of Information

Confidential information should not be disclosed to third parties without appropriate authorisation unless disclosure is required by law or a competent authority.

Where delivery of a service requires the involvement of a subcontractor, consultant or other party, the information disclosed should be limited to what is necessary and the receiving person or organisation should be subject to appropriate confidentiality obligations.

Where disclosure is legally required, the client or information owner should be informed where legally permitted.

5. Protection of Information

Confidential information should be protected using measures appropriate to its nature, sensitivity and the risk associated with its loss or disclosure.

Documents and data should not be left inadequately secured or shared through unauthorised channels.

Detailed principles relating to electronic information, devices, access and data protection are defined in SQ-POL-009 Information & Data Security Policy.

6. Client Information and Deliverables

Documentation received from clients and information obtained during audits, inspections, assessments and other assignments should be treated as confidential unless it has been made publicly available by an authorised party or otherwise agreed.

Reports, photographs, findings, analyses and other deliverables should not be distributed outside the agreed scope without appropriate authorisation.

Client information should not be used in marketing materials, references or publications without consent where this could identify the client, project or confidential information.

7. Conversations and Communications

Confidentiality also applies to conversations, meetings, electronic correspondence and other forms of communication.

Information concerning clients and assignments should not be discussed in locations or circumstances where it may be overheard or obtained by unauthorised persons.

When transmitting information, appropriate care should be taken to verify recipients, attachments and the method of communication.

8. Conflicts of Interest and Independence

Information obtained while providing services to one client must not be used in a manner that could prejudice that client's interests when performing work for another party.

Confidentiality obligations support the principles of independence, objectivity and professional integrity established in SQ-POL-001 Code of Ethics & Conduct.

9. Duration of Confidentiality

Confidentiality obligations do not automatically end when a project, contract or business relationship is completed.

Information should remain protected for as long as it retains its confidential nature or for the period required by contract, law or other applicable requirements.

10. Confidentiality Breaches

Any suspected loss, unauthorised disclosure of or access to confidential information should be reported without undue delay.

Appropriate action should be taken to limit the consequences of the incident, secure the information and establish its cause.

Where an incident involves personal data, the requirements established in SQ-POL-006 Privacy Policy and applicable data protection legislation should also be followed.

11. Our Commitment

SafeQult Consulting is committed to treating information entrusted to us by clients and business partners with appropriate care and discretion.

Confidentiality is an integral part of a professional relationship and essential to maintaining trust in the services we provide.

APPROVAL

Prepared / Approved by	Role	Date	Signature
Przemysław Łobocki	CEO	30.08.2026	