1.0 SUMMARY

The purpose of this Confidentiality Policy is to lay down the principles that must be observed by all who work with Magnum GSI Ltd and have access to confidential information. This policy, where relevant, should be read in conjunction with the appointment letter, Non-Disclosure Agreement (NDA) and/or employment contract applicable to Magnum GSI Ltd employees and personnel, and other work rules, policies and procedures applicable to Magnum GSI Ltd employees and personnel.

2.0 OBJECTIVES

Employees and personnel of Magnum GSI Ltd have a duty of maintaining the confidentiality of information received by them in the course of their employment or engagement. This Confidentiality Policy documents the confidentiality and non-disclosure duties and obligations of the employees and personnel of Magnum GSI Ltd. The employees and personnel of the Magnum GSI Ltd will, in the course of their employment and engagement, become aware of and possess information of Magnum GSI Ltd or of third parties disclosed to Magnum GSI Ltd that is not generally known. This may include information which if disclosed could jeopardise the interests Magnum GSI Ltd. It may also include commercial trade secrets disclosure of which could harm the interests of Magnum GSI Ltd. All employees and personnel of Magnum GSI Ltd have a duty to keep such information strictly confidential and to use it only for the proper purposes in accordance with the law.

Magnum GSI Ltd will maintain several safeguards to protect confidential information that is held on its system and will comply with its Data Security Policy and GDPR Policy.

3.0 Confidential Information

Confidential information includes any information which is not publicly known. It can concern technology, business, finance, transaction or other affairs of a company. It includes information which is commercially valuable such as trade secrets or business information, as well as personal information.

Examples of confidential information include but are not limited to: any document, discovery, invention, improvement, patent specification, formulations, plans, ideas, books, accounts, data, reports, drafts of documents of all kinds, correspondence, client information, lists and files, decisions, information about employees, strategies, drawings, recommendations, designs, office precedents, policies and procedures, budget and financial information in any form, i.e. physical, electronic, or otherwise. Confidential information to do with unpublished inventions can be particularly sensitive. Disclosure of an invention before a patent application is filed will cause irreversible loss of intellectual property rights to the owner of the invention. Even after a patent application is filed, care must be taken not to disclose improvements to the invention. Trade secret protection will also be lost through open disclosure of the secret.

4.0 Principles

Magnum GSI Ltd expects all of its employees and personnel to handle all confidential information in a sensitive and professional manner. Magnum GSI Ltd employees and personnel are under an obligation not to gain access or attempt to gain access to information which they are not authorised to have. Magnum GSI Ltd, however, recognises the importance of an open culture with clear communication and accountability. Magnum GSI Ltd wishes to maintain personal and organisational safety and expects all employees and personnel to handle confidential information in a way which protects organisational security. The purpose of confidentiality is essentially two-fold. Firstly, it protects sensitive or confidential information of Magnum GSI Ltd and its clients and customers. Secondly, in order for

Magnum GSI Ltd to be effective, Magnum GSI Ltd, employees and personnel must be able to share information and knowledge, and therefore confidentiality is necessary as a condition of trust. The best protection against breaches in confidentiality is to keep the number of employees and personnel who have access to sensitive information to a necessary minimum. Intentional, repeated, accidental, or unauthorised disclosure of any confidential information by any member of staff will be subject to disciplinary action. Any such disciplinary action will take account of the confidential and possible sensitive nature of the information and will make sure that in dealing with it, no further breaches of confidentiality take place.

5.0 MAINTENANCE OF CONFIDENTIALITY & NON-DISCLOSURE

Magnum GSI Ltd employees and personnel:

• must keep confidential all confidential information;
• may only use confidential information solely for the purposes of performing their duties as an employee of Magnum GSI Ltd; and
• may only disclose confidential information to persons who are aware that the confidential information must be kept confidential and who have a need to know (but only to the extent that each person has a need to know). The employee's and personnel's obligation of maintaining confidentiality and non-disclosure does not extend to confidential information that is required to be disclosed by the employee pursuant to an order of a Court or any statutory authority. The employee or person will promptly notify the Company of any such requirement to enable the Company to take necessary action as deemed fit by the Company in the circumstances. At the end of the period of employment, Magnum GSI Ltd employees must return to Magnum GSI Ltd:
• all confidential information in material form;
• those parts of all notes and other records in whatsoever form, based on or incorporating confidential information;
• all copies of confidential information and notes and other records based on or incorporating confidential information; and
• all Magnum GSI Ltd property and assets, in the possession or control of the Magnum GSI Ltd employee or personnel. The obligation of maintaining confidentiality and non-disclosure will continue even after the end of the period of employment or engagement in respect of all confidential information. Any employee found to be in breach of this confidentiality and non-disclosure obligation, whilst employed by Magnum GSI Ltd will be disciplined, and in serious instances, dismissed. Any ex-employee found to be in breach of this confidentiality obligation may be subject to legal action being taken against them, dependent upon the circumstances of the breach, including cancellation / withdrawal of any or all benefits if extended to the ex-employee by the Company. This policy will operate in conjunction with the contract of employment or letter of appointment for Magnum GSI Ltd employees and personnel.

6.0 CIRCUMSTANCES IN WHICH INFORMATION CAN BE DISCLOSED

The following are examples of where confidential information can be disclosed;

- With the written consent of his/her reporting superior of not lower than Senior Management and for a particular purpose.
- If the information is required by or under a Court order or of a statutory authority, the employee or person will promptly notify the Company of any such requirement to enable the Company to take necessary action as deemed fit by the Company in the circumstances.
- Where disclosure can be justified for any other purpose. This is usually for the protection of the public and is likely to be in relation to the prevention and detection of serious crime. A request for information by the police must be carefully considered.
- The Magnum GSI Ltd employee must be able to justify any decision when information has been disclosed.

7.0 STORAGE OF DATA

No written document containing confidential information must be left visible where it can be read by anyone. This includes telephone messages, computer prints, letters and other documents. All hardware containing confidential information must be housed in a secure environment. Security precautions must be taken in accordance with the Magnum GSI Ltd Policy and Procedures.

Confidential information must not be entered into personal or unapproved online tools, including AI chat services. Approved AI tools may only be used as set out in PO40.00 AI Systems Management Policy.

GeoScreen order details, including site locations, client names and customer email addresses, are confidential and are handled in line with PO39.00 GeoScreen Website Privacy Policy.

8.0 THE MEDIA

Confidential information must not be passed on to members of the press, or other media communications without the written consent of his reporting superior of not lower than Senior Management and for a particular purpose. All requests from the media must be dealt with under the Magnum GSI Ltd Quality Management System for handling media queries.

9.0 RESPONSIBILITIES

9.1 Roles

Corporate Governance – The Director of Magnum GSI Ltd (Tristan Morgan) is responsible for the protection of confidential information.

Management – Managers and line managers are responsible for making sure their teams understand and follow this policy, that access to confidential information is limited to those who need it, and that any breach is reported and dealt with.

Employees – All employees and personnel are responsible for complying with this Confidentiality Policy and must report any actual or suspected disclosure of confidential information to their line manager or the Director straight away.

10.0 COMMUNICATION OF THE POLICY

This policy will be communicated to all Magnum GSI Ltd. staff during their induction and brought to the attention of other stakeholders as required.

11.0 REVISION HISTORY

Version	Date	Description of change
3.0	March 2025	Previous issue
4.0	31 October 2026	Annual review. Wording on the return of company property corrected. Roles section rewritten (it had been copied from PO6.00). Rules added on AI tools and GeoScreen order data. Quality Manager role now held by the Director (Adam Morgan has left the company).

Signed by.



Tristan Morgan

Director.

Date: 31 October 2026