



## Confidentiality Policy

### Purpose:

The Confidentiality Policy establishes the standards that govern the way we interact and communicate with each other, our clients and customers, governments, regulators, suppliers, competitors, the media and the public at large.

Confidential information (verbal, written, or machine readable) is accessible to all Acres employees through the course of employment, is proprietary or non-public information of the company, and is considered confidential.

Complying with the Confidentiality Policy is an integral part of the terms and conditions of employment with Acres. As a responsible business enterprise and corporate citizen, Acres is committed to conducting its affairs to the highest standards of confidentiality, ethics, and integrity.

### Scope:

This policy applies to every employee of Acres Enterprises Ltd.; and its subsidiaries and affiliated companies.

All confidential information should be maintained by all Acres employees in a manner which ensures its privacy and safety.

### Policy:

All Acres employees are required to apply these policy principles in exercising our judgment when we face questions, concerns or issues regarding confidentiality that do not present obviously correct answers or approaches.

During the course of employment, Acres employees may have access to confidential information. This confidential information should be solely used for the purposes of performing his/her various services for the company and for no other purpose.

Acres employees should not use confidential information in any manner that is to the competitive advantage of others, and/or is otherwise adverse or detrimental to Acres.

### Procedures and Guidelines

Employees shall not disclose any confidential information related to company matters to any person who does not have a legitimate need to know, both internal to Acres, and external – clients, customers, suppliers, etc.

Employees should take all reasonable steps to protect confidential information from disclosure, e.g., password protecting computers and/or storing/filing confidential paperwork in a locked drawer, etc.

Employees should not electronically forward or store confidential information so as to give access to those without a legitimate need to know. It is not appropriate to have discussions about confidential information in open areas (e.g. field operations/sites, hallways, etc.) where individuals (internal or external) who do not have a need to know this information could overhear the conversation.

Employees who disclose confidential information to those without a legitimate need to know or who disclose confidential information observed or heard without proper authorization may be subject to progressive discipline up to and including termination.

If an employee overhears or observes another employee sharing or discussing confidential information in an inappropriate area, their manager and Human Resources should be contacted. They are then responsible for investigating the allegations.

Acres employees who violate this policy may be subject to progressive discipline up to and including termination.

Employees should consult their supervisor or manager, or Human Resources, if in doubt about what circumstances might warrant confidentiality consideration.