



CONFIDENTIALITY POLICY AND PROCEDURE

Revision Details

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1 POLICY

CoZero shall, through legally enforceable commitments, implement a policy of the confidentiality of the information obtained or created during validation or verification activities. All employees, committees, external consultants, contractors, personnel of external bodies or individuals acting on behalf of CoZero will be bound by this policy.

Information about a client shall not be disclosed to a third party without the written consent of the client, and when a disclosure is required by law, the client will be notified in writing in advance of the information being disclosed. Information about the client from an outside source, such as a complainant or regulators, will be treated as confidential.

CoZero shall use facilities and methods that will ensure secure handling of confidential information.

2 PROCEDURE

2.1 Legally Enforceable Commitments

- ☐ CoZero's letter of appointment includes a clause which binds all employees to the confidentiality requirements in regard to client and company information as described in the company's policy on confidentiality. All employees are required to sign the letter of appointment upon commencing employment.
- ☐ All CoZero employees shall sign the Annual Compliance Declaration (00CZ00-MF-0010), stating their compliance with all CoZero's policies and procedures, including confidentiality.
- ☐ The verification service agreement (ref. 00CZ00-MA-0001) shall be signed by the verification team and the client at the kick-off meeting. This outlines the confidentiality requirements of the client and CoZero.
- ☐ Where very sensitive information may be disclosed to CoZero an additional non-disclosure agreement may be signed with the client.
- ☐ In instances when CoZero has to make use of consultants or experts, the terms or reference, including confidentiality issues, will be included in the letter of appointment. Consent from the client will be obtained in the case where a consultant will be appointment to perform duties on behalf of CoZero.



- ☐ If disclosure is required by law or requested by SANAS/regulators, CoZero will, unless legally prohibited, notify the client in writing prior to disclosure.

2.2 Client Information Disclosure

- ☐ If the information is to be placed in the public domain, or made available to a third party, such as to the DTI or SANAS, CoZero shall obtain their consent thereto.
- ☐ If a third party requests information pertaining to CoZero's client, such as their emission levels and types, or any aspect pertaining to the results of the verification process, that party will be referred back to the client, and the client should request in writing that CoZero make the information available to the third party. The analyst (receiver of the request) will forward it to the Verification Committee, which will give consent to release the information. Only then can the information be revealed to the third party and the approval by the client will be filed in the client file.
- ☐ Where CoZero intends to place client-related information in the public domain (including publishing V/V opinions or summary findings), CoZero will inform the client in writing in advance and obtain client consent where required, except when disclosure is required by law or by accreditation/regulatory bodies.
- ☐ Approvals or client consents for disclosure shall be recorded and filed in the client file (Client File Register), including name/date of approver and the disclosure content.

2.3 Confidentiality of Client Files

- ☐ All completed project files will be scanned and saved on CoZero's server before file sign-off and hard copies of files are destroyed after a minimum of 5 years. Backups are kept off-site and backed up daily, so as to ensure that the client's information is secure. In accordance with CoZero's Control of Records Policy (00CZ00-MP-0003), all hard copy client files will be scanned onto the network server.
- ☐ The confidentiality issues relating to the control of records is further detailed in the Control of Records Policy and procedure.

See also: Engagement Terms (00CZ00-MA-0001 clause 13/15), Control of Records (00CZ00-MP-0003), and Client Use Policy (00CZ00-MP-0017) for related processes and evidence.