POLICY NAME	CONFIDENTIALITY POLICY
POLICY OWNER	DIRECTOR – CORPORATE AFFAIRS
POLICY DATE	DECEMBER 2015
APPROVED BY	MAS APPAREL BOARD
LAST REVIEW DATE	SEPTEMBER 2025

MAS
CHANGE IS COURAGE

CONFIDENTIALITY POLICY

CONTENTS

1.0 PURPOSE AND OBJECTIVE 2

2.0 SCOPE 2

3.0 WHAT IS ”CONFIDENTIAL INFORMATION”? 2

4.0 GUIDELINES ON HOW TO HANDLE CONFIDENTIAL INFORMATION 3

5.0 GUIDELINES SPECIFIC TO VISITORS 5

6.0 PERSONAL OR PRIVATE CONFIDENTIAL INFORMATION 5

7.0 RESPONSIBILITY 6

8.0 EVALUATION AND MONITORING 7

9.0 VALIDITY OF THE MAS CONFIDENTIALITY POLICY 7

10.0 DEFINITION 7

ALL TEXT, IMAGES AND OTHER MATERIALS CONTAINED IN THIS DOCUMENT ARE PROPRIETARY AND CONSTITUTE VALUABLE INTELLECTUAL PROPERTY OF MAS HOLDINGS (PRIVATE) LIMITED. NO PART OF THIS MATERIAL MAY BE REPRODUCED OR TRANSMITTED OR IN ANY OTHER FORM DISSEMINATED WITHOUT THE PRIOR WRITTEN CONSENT OF MAS HOLDINGS (PRIVATE) LIMITED AND SHALL ONLY BE USED TO THE EXTENT AUTHORISED BY THE LAW UNLESS PRIOR AUTHORISATION IS OBTAINED FROM MAS HOLDINGS (PRIVATE) LIMITED AND SUFFICIENT ACKNOWLEDGEMENT FOR SUCH MATERIAL IS PROVIDED. ALL UNAUTHORIZED DUPLICATION OR ANY OTHER USE OF MATERIALS SHALL CONSTITUTE INFRINGEMENT OF THE INTELLECTUAL PROPERTY OF MAS HOLDINGS (PRIVATE) LIMITED AND SHALL ENABLE MAS (HOLDINGS) PRIVATE LIMITED TO FULLY EXECERCISE ITS RIGHTS THERETO.

© Copyright 2025 MAS Holdings (Private) Limited

POLICY NAME	CONFIDENTIALITY POLICY
POLICY OWNER	DIRECTOR – CORPORATE AFFAIRS
POLICY DATE	DECEMBER 2015
APPROVED BY	MAS APPAREL BOARD
LAST REVIEW DATE	SEPTEMBER 2025

MAS
CHANGE IS COURAGE

1.0 PURPOSE AND OBJECTIVE

All the confidential information we create as a group of companies is a valuable resource, so it is important we recognise that and be fully aware of how it can be protected to preserve its value. Equally, there will be times when we receive confidential information from others, and we need to make sure we protect ourselves against any misuse of that information.

This policy sets out clear, fair and reasonable guidelines on how employees and others handle or control confidential information. No policy can cover all eventualities, so employees and other stakeholders are expected to use their good judgement and common sense in applying these guidelines. Provided we do that, we will maintain the competitive advantage and continued success of MAS.

2.0 SCOPE

This policy shall apply to:

- All permanent and non-permanent employees which shall include consultants and interns engaged with MAS under contractual terms or letters of engagement ("Employees");
- Advisors, non-executive directors and advisory board members ("Advisors");
- All corporate and individual visitors to MAS premises ("Visitors"); and
- All suppliers, sub-contractors and agents that MAS deals with and who, in the course of their relationship with MAS, have been provided access to information which is confidential and/or is owned by MAS ("Third Parties").

If as an MAS Employee or Advisor you deal with Visitors and Third Parties, it is your responsibility to make sure that you comply with this policy when you are disclosing or revealing our confidential information or are receiving confidential information belonging to others. If you are in doubt please contact your line manager, IP Risk Manager, and/or Group Legal.

3.0 WHAT IS "CONFIDENTIAL INFORMATION"?

Confidential Information" is a term we use to describe information belonging to MAS (or, as appropriate, to Third Parties) which has a number of key features to it:

- It must not be in the public domain or be publicly available (for example by a Google-type search);
- It must be commercially valuable and give our business a competitive advantage;
- It must be capable of being defined (for example by reference to a document, a product or a specific business presentation.)

Confidential Information is sometimes called "Proprietary Information"; "Know-How"; a "Trade Secret" or a "Commercial Secret". These describe all types of confidential information and do not affect the key features above.

Confidential Information can refer to a type of information about our business such as:

- Technical information about our products or how they are made
- Our manufacturing processes
- Details of our customers or suppliers

© Copyright 2025 MAS Holdings (Private) Limited

- Our business plans or strategies
- New product details
- Financial information

Confidential Information can appear in a variety of formats such as:

- Electronically stored information or data
- Paper information such as specifications
- Plans or product designs
- Models or product mock-ups

Confidential Information can be disclosed in a variety of ways:

- Electronically, by email or SMS message
- Physically by handing over a document
- Orally in a meeting or on the telephone
- Visually – by allowing people to see a process or a product

All MAS Employees and Advisors are deemed to understand the following:

- The importance MAS attaches to the protection of its Confidential Information
- The importance of respecting the confidentiality of the Information disclosed to us by others
- The importance of following the guidelines set out below and of seeking help when in doubt

4.0 GUIDELINES ON HOW TO HANDLE CONFIDENTIAL INFORMATION

If you think you have devised something (a product or process) which is patentable (see **IP Policy**) you must disclose full details of that immediately to Group Legal so that proper protection can be obtained as soon as possible.

- If as part of your job, you have to disclose Confidential Information to external Third Parties, you must seek advice from Group Legal about the use of an appropriate Non-Disclosure Agreement ("NDA").[1] If the Third Party concerned refuses to use one, you should not be sharing Confidential Information until an NDA is signed. Any exception to this rule must be approved by your line manager in consultation with Group Legal.
    - Mark confidential documents as mentioned below to emphasise its importance and sensitivity as per document classification guidelines set out in the **MAS Data Loss Prevention Procedure;**
        1. Public
        2. MAS Only
        3. Confidential – External
        4. Confidential – Internal
- Record and, where appropriate, obtain confirmation of receipt of a document containing Confidential Information disclosed to Third Parties.
- Keep sensitive documents (physical and Digital) or products (secure location subject to access control) in a safe or other secure place.

[1] Types of NDAs - one sided NDA, Mutual NDA, and Individual NDA

© Copyright 2025 MAS Holdings (Private) Limited

- If disclosure is by electronic means, use appropriate wording in an email to inform recipients about the confidentiality of the content and obtain appropriate confirmation from them that they understand any restrictions on disclosure or use. Your email should reflect the sensitivity label that has been put in place.
- Use information protection functionality provided with email and other Office applications to protect email and attachments containing Confidential Information.
- Obtain authorisation to disclose Confidential Information in any public setting – e.g. a conference or exhibition.
- Erase whiteboards and remove documents after use in meetings.
- Use encryption as advised by MAS Technology Services (on any laptops, company provided external storage or similar devices taken outside of MAS Premises) (see **Information System Usage Policy**).
- Use appropriately secure passwords for computers/mobile phones/tablet computers.
- Store Confidential Information securely in line with **Information System Usage Policy**.
- Shred, permanently erase or securely dispose Confidential Information in line with the policies and agreements
- Employees are obligated to maintain the confidentiality of proprietary information even after their employment ends, in accordance with their Employee NDA.

Things that you must not do if you handle Confidential Information on behalf of MAS

- Publicise any Confidential Information which may contain details of a patentable invention since this may destroy any novelty and deny MAS the chance to obtain patent protection.
- Enter into an NDA without authorisation or having the NDA signed by an unauthorised officer.[2]
- Disclose Confidential Information to others (including Employees, Advisors or Visitors) who do not need to know or have access to the information.
- Expose Confidential Information in a way which puts it at risk of being seen by non-authorised persons. So, you must not leave laptops, PCs, any other devices or documents containing Confidential Information on display when you are absent. Do not leave Confidential Information (including, for example, new products or materials in development) unattended in any place where there is a risk of it being seen by unauthorised people.
- Share Confidential Information with friends and family, even while you are working from home.
- Talk about Confidential Information in public places such as elevators, airplanes or restaurants where it may be overheard.
- Copy Confidential Information on to unauthorised media, computers or systems unless authorised (refer **MAS Information System Usage Policy**).
- Post or share MAS Confidential Information in social media (refer **Social Media Policy**)

Things you must do if you receive Confidential Information from Third Parties

- Obtain authority to receive the Confidential Information in question and preferably use a

[2] Connect with your finance team or relevant contract administrator to obtain the authorized signatory details

© Copyright 2025 MAS Holdings (Private) Limited

standard NDA drafted by Group Legal.

- Make sure you use the Confidential Information or disclose it to others only as set out and authorised by the NDA.

5.0 GUIDELINES SPECIFIC TO VISITORS

MAS Employees and Advisors must ensure that:

- Visitors to MAS Premises sign a Visitor NDA based on the sensitivity of the zone giving appropriate authorised access to MAS Premises.
- All Visitors must identify themselves when entering MAS Premises aligned with the applicable visitor management system.
- Visitors must at all times prominently display a Visitor badge indicating access clearance level authorised by MAS.
- Visitors must only be allowed to visit areas they have been authorised to access as indicated on the Visitor badge.
- Visitors shall at all times be escorted by an MAS employee(host).
- Visitors are prohibited from making any copies of any documents they handle during their visit (unless specifically authorised otherwise).
- Visitors shall not be allowed to take photographs or make any video or audio recordings or copy information by any other means (unless authorised) refer the **No Photography policy**).

6.0 PERSONAL OR PRIVATE CONFIDENTIAL INFORMATION

Most of the Confidential Information, Employees and Advisors deal with will be sensitive commercial or business information. Some of it however may include personal information/ sensitive personal information relating to individuals (employees, contractors, customers, third parties, vendors or visitors). You must make sure that any local law on data protection or the processing of personal data is observed, and any potential violation or personal information leakage must be reported to Data Protection Officer (DPO). {see **Internal Privacy Policy**}

© Copyright 2025 MAS Holdings (Private) Limited

7.0 RESPONSIBILITY

Party Responsible	Actions
MAS Apparel Board	• Approval and sign-off
Director - Corporate Affairs	• Ownership and authority to make amendments
MAS Governance Structure	• Addressing non-compliance
Code Officers	• Ensure the respective unit adheres to the policy and provide further support if and when required • Ensure to regularly communicate and have educative sessions within the respective units on the **Confidentiality Policy** utilizing the resources provided by the Corporate Group HR team • Work with HR to ensure new recruits receive mandatory education about the importance of confidentiality and training on the policy • Record and investigate all violations in a timely manner • Liaise with Group HR and provide regular feedback on the policy and process via policyinfo@masholdings.com
Line Managers	• Educate your team on the **Confidentiality Policy**. • Have an annual mid-year discussion with the team emphasizing the importance of adhering to the policy • Ensure the respective members of the team have duly signed their NDAs [3]when dealing with third parties, ensure to use the appropriate NDA before conveying confidential company information • Refrain from discussing confidential issues pertaining to the company or employees in common/ public spaces (e.g.: restaurants, airports and social media as well) (refer **Social Media Policy**) • Educate the team on the importance of not disclosing Confidential Information in public spaces (e.g., restaurants, airports) and even on social media (refer **Social Media Policy**) • Ensure the team clean up and not leave anything confidential in meeting rooms even within the department premises • Report any violations immediately to an SBU/ Divisional/ Group Code Officer or via the DNA help desk

[3] The types of NDAs – One sided NDA and Mutual NDA

© Copyright 2025 MAS Holdings (Private) Limited

Employees	• Read, understand and comply with the **Confidentiality Policy** and associated **Information Security and Privacy policies.** • Ensure to use password protection on all company information which are stored digitally. • Ensure to securely store away all company files and other documents within your care after use. • Dispose/ shred documents that are not needed. • Ensure to secure and close cabinets, desks and drawers assigned to each employee, and store the keys safely. • Refrain from storing company documents and files on pen drives, hard drives and other personal devices • Refrain from posting issues or information related to MAS discussed on social media without the necessary approvals from your Line Manager (refer to **Social Media Policy**)

8.0 EVALUATION AND MONITORING

This **Confidentiality Policy** has been made available to all MAS Employees and MAS Employees shall enter into a NDA at recruitment in line with the MAS policies.

9.0 VALIDITY OF THE MAS CONFIDENTIALITY POLICY

The policy has been reviewed and approved on December 2014 by the Board of Directors of MAS Holdings (Private) Limited. It will be reviewed regularly in response to changes in relevant legislation, contractual arrangements, good practice or in response to an identified failing in its effectiveness.

10.0 DEFINITION

- MAS – MAS Holdings (Private) Limited and its subsidiaries, affiliates and joint venture companies
- MAS SBU – a subsidiary or affiliate of MAS
- MAS Governance Structure -The Central DNA Team, appointed SBU, Divisional, and Group Code Officers.
- Group Legal – the central in-house legal function of MAS
- Divisions – a division within a MAS SBU, including but not limited to Finance, HR, IT, Innovation etc.
- Intellectual Property - any trademarks, service marks, trade dress, trade secrets, patents, labelling, packaging, hang-tags, trade names, distinctive words, logos, drawings, art work, product ideas and concepts, pictures, colors, formulas, discoveries, inventions, specifications, proprietary information, processes, designs, design and/or utility models or copyrights, or any marks or works similar thereto, any and all applications for the foregoing, and any and all modifications, derivations, improvements or adaptations thereof.

© Copyright 2025 MAS Holdings (Private) Limited

Contact Us

If you have any questions with regard to the policy, please get in touch with your SBU, Divisional or Group Code Officers, or the DNA Helpdesk. Or the DNA Hotline, we are happy to help you!

- *Email us on – policyinfo@masholdings.com*
- *Report via the DNA Helpdesk –– log on to masdnahelpdesk.ethicspoint.com*
- *Call the DNA Hotline –*
  - *Hutch 0723 005 005*
  - *Airtel 0758 005 005*
  - *Dialog 0117 395 005*

© Copyright 2017 MAS Holdings (Private) Limited

MAS | Confidential - External