

### Appendix E: Confidentiality Policy

AXC is unequivocally committed to maintaining the confidentiality of all proprietary and sensitive information obtained or created during the performance of its management system certification activities. We recognize that the protection of confidential information is fundamental to building and maintaining trust with our clients and interested parties, and is a critical aspect of our impartiality and professional integrity. This policy applies to all personnel involved in certification activities, including top management, employees, auditors, technical experts, certification reviewers, members of any committees, and any external individuals or organizations working on behalf of AXC.

Confidential information includes, but is not limited to:

- Client's management system documentation, records, and data.
- Financial, commercial, technical, and operational information of clients.
- Personal data of client personnel.
- Audit findings, reports, and related correspondence.
- Information related to appeals and complaints.
- Proprietary information of [Name of Certification Body] itself.
- Any other information explicitly identified as confidential by the client or by law

The following principles guide our commitment to confidentiality:

- **Non-Disclosure:** Confidential information will not be shared with any unauthorized third party without the explicit written permission of the information owner (e.g., the client), except when mandated by law or accreditation standards.
- **Need-to-Know Basis:** Access to confidential information is restricted to personnel who require it to perform their legitimate duties related to the certification process.
- **Data Security:** Appropriate technical and organizational measures are implemented to protect confidential information from unauthorized access, disclosure, alteration, or destruction.
- **Legal and Ethical Compliance:** All handling of confidential information will comply with applicable laws, regulations, and ethical standards (e.g., data protection laws).
- **Personnel Responsibility:** Every individual with access to confidential information is personally responsible for its protection and adherence to this policy.

Any breach of this Confidentiality Policy will be treated with utmost seriousness. Such breaches may result in severe disciplinary action, up to and including termination of employment or contract, and potential legal action for damages or non-compliance with data protection laws



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