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| TRANSMISSION SYSTEM OPERATOR     | CENTRAL FACILITY                        | DOCUMENT CODE |
| DIRECTORATE OF CORPORATE AFFAIRS | Confidentiality and impartiality policy | POL/ A.13.2.4 |

Protocol No: 4853/16

Tirana, on 06/08/2021

C2 Internal

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| <b>I-PURPOSE</b>   |
| The purpose of this policy is to make staff aware of confidentiality and intellectual property protection.   |
| <b>II - SCOPE AND COMPATIBILITY</b>  |
| All OST sh.a. staff  |
| <b>III- FOR THE ATTENTION OF:</b>  |
| OST sh.a. staff  |
| <b>IV-REFERENCES</b>   |
| This policy refers to section A.13.2.4 of the ISO 27001:2013 Information Security Management System.<br>- Law no. 43/2015 "On the electricity sector", as amended;<br>- Law no. 9901, dated 14/04/2008 "On merchants and commercial companies", as amended;<br>- Labor Code;<br>- Code of Ethics for OST employees;<br>- OST Compliance Program. |
| <b>V- CONTACT PERSONS</b>  |
| Gerald Bici - Head of Sector, Information Security Policy Sector<br>Majlinda Despoti - Director, Directorate for Corporate Affairs   |
| <b>VI- HISTORY</b>   |
| 0.0 - Initial version  |

| DRAFTED  | REVIEWED   | ACCEPTED BY   | APPROVED BY:   | VERSION     | DATE       | PAGE: |
|--|--|---|--|-------------|------------|-------|
| Gerald Bici<br><br>Head of Information Security Policy Sector<br><br>(Signature) | Brunilda Veizi<br><br>Head of Sector, Legal Directorate\Sector of Administrative and Judicial Affairs<br>(Signature) | Majlinda Despoti<br><br>Directorate of Corporate Affairs<br>(Signature)<br><br>Hida Neziri<br>Legal Department and Corporate Affairs<br>(Signature) | Skerdi Drenova<br><br>OST sh.a. Administrator<br>(Signature) | Version 0.0 | 22/03/2021 | 1/3   |



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## 1. Impartiality Policy

OST sh.a., in all its operations, is committed to independence and impartiality in relations with all parties concerned.

OST maintains a presence of objectivity, independence, neutrality and freedom from conflict of interest.

All OST personnel are aware of their duties, responsibilities and that the impartiality requirement must be maintained at all times in order to ensure that potential conflicts of interest do not arise.

## 2. Statement of Confidentiality

**OST sh.a.**, in all its operations, is committed to maintain the confidentiality of its stakeholders and partners. All information disclosed and indicated as confidential shall be handled as such. **OST sh.a.** shall use such information only to facilitate its business transaction, and for communication purposes (email, telephone, etc.) when required.

**OST sh.a.** shall not disclose such information to third parties, unless: i) prior written approval is given by other related parties, ii) its dissemination is expressly required by law, iii) the information is not considered confidential. Confidential Information refers to all technical and non-technical information, including documentation, drawings, plans, specifications, policies, procedures, operational and trade secrets, data of parties concerned, findings and results/reports derived from tests, methods, formulas; and any other material that is offered to **OST sh.a.** and which is not considered public based on Law 119/2014 "On the right to information".

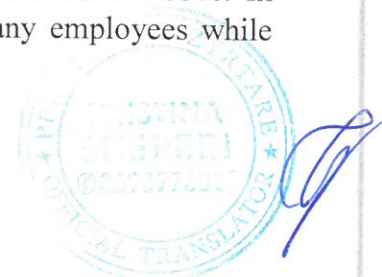
All **OST** personnel are aware that the confidentiality requirement must be maintained at all times.

## 3. The Confidentiality of the provided Information applies the same for third parties

Third parties may provide **OST sh.a.** with confidential information, from time to time, as part of an ongoing business relationship. Examples of information supplied by third parties include, but are not limited to, personal data, family details, addresses and contact numbers. All confidential information falls under this policy and must be handled with care. In addition, **OST sh.a.** and third parties, may enter into specific agreements regarding information sharing and confidentiality. **OST** must agree to the terms of these specific agreements.

## 4. Intellectual property

All original works created by **OST sh.a.** employees during the use of the company's resources and while being part of the company are exclusive property of **OST sh.a.** In this context, original works shall include, but not limited to, all of the items listed above. In addition, any articles, notes and correspondence created by the company employees while being part of the company are also property of **OST sh.a.**



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## 5. Employees' liability

All employees, including temporary employees, are bound by this policy and are responsible for protecting confidential information. Any questions or concerns regarding this policy should be immediately referred to the Information Security Manager for resolution.

