

	Document Title	Code of Conduct & Ethics Policy		
	Doc. Number	GEN-POL-001	Doc. Owner	General Manager
	Author	Angela Byrne	Revision	Rev. 04
	Reviewed by	Angela Byrne	Approved by	Fiona Spillane
	Next Review Date	21/01/2027	Approved Date	21/01/2026

1. Policy Statement

At Shorcontrol Safety, our Code of Conduct & Ethics is embedded in our culture and supports our company’s purpose, mission, vision, and core values. We recognise how important it is that we all understand our obligation to conduct business in a way that is both ethical and consistent with our established policies and procedures.

Our policy aims to wholly reflect our commitment as a growing business and emphasises the key principles that guide us to always act with integrity and to do what is right. To safeguard our reputation and contribute to the ongoing success of the business, it is important for all of us to take the time to review, understand and live the value of our Code.

Shorcontrol Safety’s strategy to implement this policy includes awareness training for all managers and employees, creating an inclusive working environment, and expanding external collaborations where possible. Further appropriate actions regarding the successful implementation of this policy will be identified and implemented on an ongoing basis.

2. Purpose

The purpose of this code is to provide a roadmap we should follow every day that helps guide us to what is and isn’t acceptable when making decisions that affect Shorcontrol Safety. We expect and require every employee to act in accordance with applicable law and consistent with our core values and business principles. We also expect our contractors, suppliers, consultant, and any other representative of Shorcontrol Safety to adhere to these standards. Violations or breaches of the code may lead to disciplinary proceedings for employees, up to and including dismissal.

3. Scope

The scope of this standard applies to how we at Shorcontrol Safety:

- Treat each other in the workplace,
- Manage our environmental responsibilities,
- Engage with competitors,
- Interact with government officials and
- Protect our confidential information as well as that of our clients,

and it applicable to all employees, representatives, contractors, suppliers, and consultants etc. of Shorcontrol Safety. The code applies to interactions in our shared professional lives, including daily office encounters, shared online spaces, social media, conferences, meetings, and other events which represent Shorcontrol Safety.

4. Definitions

Terms	Definitions
Conflict of interests	Refers to a situation where a person can make or influence a business decision for Shorcontrol Safety while their personal interests or the interests of any related parties could differ from that of the business interests.

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Related party/ Connected person	Refers to any person to whom you are related or with whom you have a personal relationship that may influence or could reasonably influence your business judgement.
Significant interest	A person holds a significant interest in a business if the person a. directly or indirectly holds shares, assets or other interests in the business, b. has a leadership role in the business, or c. would benefit from the relationship with the business.
Equality	Where all members of a society or group have the same status, rights, opportunities, responsibilities and are treated fairly within the company regardless of age, gender, civil status, disability, religion, sexual orientation, race, ethnic association.
Diversity	Where there is a workforce intentionally comprised of individuals with a range of characteristics, including gender, race, age, ethnicity, religion, education, sexual orientation, and other attributes.
Inclusion	The culture of the company is one where a diverse mix of people can come to work, feel comfortable and confident of being their authentic selves and work in a way that suits their needs while delivering the needs of the business.
Personal Data	Information that relates to or can identify a person. Either by itself or together with other available information. It can include: <ul style="list-style-type: none"> • Name, • Address • Contact details. • PPSN • IP/ Internet address • Access cards • CCTV footage, Audio or Audio-visual recordings • Location data
Third-party	A person, organisation, or business operating external to Shorcontrol Safety.
Bribe	A bribe is a type of improper payment. It is anything of value given or offered to someone for their personal benefit that may be seen as an attempt to influence an action of decision to be made on behalf of the organisation they represent, to benefit or give advantage to Shorcontrol Safety.
Kickback	A kickback is a form of bribe in which a sum of money already paid or due to be paid is returned as a personal reward for making or fostering a business arrangement.
Government official	An officer or employee of a government, department or agency, any public international agency, or any person acting in any official capacity on behalf of the government, department, or public international agency, as well as any other person deemed to be a government official by our procedures.
Good faith	Conducting business with an honest and sincere intention.

5. General Policy Information

5.1 Conducting Business with Integrity, Fairness & Respect

Our operating philosophy is that all of us, employees, and management alike, share in the responsibility to ensure Shorcontrol Safety's success. To live up to this responsibility, we must all act with integrity.

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This means that we must follow the spirit of laws that apply to us, uphold this code, and honour our commitments.

We must be fair in our dealings with other employees, clients, customers, suppliers, and any other stakeholder.

It is furthermore essential that we respect others who may have different thoughts and opinions, act with sensitivity and concern toward the culture and customs of all our employees, clients, suppliers, and representatives etc.

5.2 Compliance with Antitrust, Antibribery & Competition Laws

At Shorcontrol Safety we compete vigorously, but with respect to free and fair competition. As a result, we must comply with all applicable Irish & EU antitrust, antibribery and competition laws. We will not engage in any activities that violate these laws such as agreeing with our competitors to fix prices, discounts, terms of sale, limit service provision, coordinate bidding activities, boycott customers or suppliers, fix employee compensation or agree not to hire each other's employees.

We do not accept or offer bribe or kickbacks, either directly or through third parties. In giving or accepting anything of value we must think about whether doing so could influence a business decision or cause others to perceive such influence. We must also ensure that the records of all payments we make are always accurate and complete. These obligations apply in all cases and are especially strict in matters involving government officials.

Our commitment to antibribery applies, without exception to all of our operations. We also expect that third parties acting on our behalf to uphold this commitment.

For further explanation see our *Anticorruption, Antibribery & Antitrust Policy*.

5.3 Financial Reporting

Our credibility depends on the accuracy of our financial reports, and we must follow all applicable Irish and EU laws related to financial reporting. We must also be completely accurate in our finance entries. Our financial controls are designed to ensure the accuracy and timeliness of our reports. We do not tolerate anyone taking any step or ordering someone else to take any step, to circumvent these controls through false or misleading entries. Doing so is a serious violation of this Code of Conduct & Ethics and may also be a criminal offense.

5.4 Improper Securities Trading

We may at times gain access to confidential information about Shorcontrol Safety's suppliers, competitors, customers etc. through their work. This inside information, if we use it for investment purposes could give us an unfair advantage over other investors. Buying or selling securities, like stocks and bonds, based on inside information is illegal and the penalties can be severe. Therefore, if we have any inside information about Shorcontrol Safety or any other company, we are prohibited from making any investments in that company until the information becomes public and investors have had a chance to evaluate it.

We are also not permitted to share inside information with co-workers or people outside the company if they are not authorised to receive it. This prohibition extends to sharing inside information with relatives or friends.

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5.5 Environment and Occupational Health & Safety

Environmental care is a core value at Shorcontrol Safety. It is essential that we all can work in safe and clean environments. We aim to grow into an industry leader in occupational health & safety and environmental responsibility in all our operations.

We are committed to complying and ensuring that our suppliers comply, with all health, safety and environmental laws and regulations that apply to us through implementing a systematic review programme and monitor it at all times for each operation.

Our commitment to health, safety and the environment is explained further in our *Environmental, and Occupational Health & Safety Policy*.

5.6 Protection of Personal Data & Use of Confidential Information

We respect the privacy of our employees, clients, stakeholders, and all interested parties and are committed to protecting their personal data. We process personal data lawfully, transparently, and fairly. We will also take reasonable steps to protect the integrity and confidentiality of personal data.

In the course of our business activities, we are required to collect and use certain types of information including ‘personal data’ and ‘special category data’. At Shorcontrol Safety we are firmly committed to preserving the privacy of all our stakeholders, interested parties, and employees, in accordance with applicable law following the EU General Data Protection Regulation (GDPR).

Like any other asset, confidential information, which includes proprietary information and intellectual property belonging to us, our customers, suppliers,

or other stakeholders, is a valuable part of our business and we are obligated to safeguard it. Confidential information should not be shared with anyone outside the business unless it is required by law or for an authorised business purpose and should only be shared internally on a need-to-know basis.

Our commitment to the protection of personal data is explained further in our *Data Protection & Privacy Policy*.

5.7 Respect for Human Rights

Respect for the human rights of employees and other stakeholders is a cornerstone of our culture. We believe in fair and equitable treatment. We have established anti-harassment and anti-discrimination policies that help us ensure a respectful workplace environment for all and complaint management and investigation procedures to help remedy improper conduct.

We prohibit workplace bullying or harassment of any kind, promote tolerance of individual practices and accommodate those in need of assistance, based on all legally protected grounds. We provide fair working conditions for our employees and do not tolerate the use of slavery, human trafficking, child or forced labour in the company or across our supply chain.

It is our commitment that we do not participate in any form of discriminatory compensation practices and that employees are fairly compensated having regard to objective criteria and principles of internal equity as well as external competitiveness, regardless of personal characteristics.

Our commitment respect for human rights in the workplace are further explained in our *Equality, Diversity & inclusion Policy*.

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5.8 Equality, Diversity & Inclusion

Equal opportunity, diversity and inclusion are cornerstones of Shorcontrol Safety’s culture. At Shorcontrol Safety we believe that all people deserve equal opportunities regardless of gender, ethnic background, age, religion, disability, and individual capabilities. We embrace equal opportunities, diversity, and inclusion as we believe that it positively influences employee satisfaction and ultimately our success. We are committed to promoting equality, diversity, and inclusion in all aspects of our business activities: employment, education, and service provision.

We aim to attract, recruit, and retain talent with diverse backgrounds, perspectives, and capabilities. We aim to create a safe, respectful, and inclusive workplace where our employee can bring their whole selves to work, live our core values, achieve sustainable results, and improve our business.

Our commitment to equality, diversity and inclusion in the workplace are further explained in our *Equality, Diversity & inclusion Policy*.

5.9 Careful Communication

We must ensure at Shorcontrol Safety that what we write and say while on the job, and outside of work reflects the integrity and standards expected of us. To protect our reputation and that of the company, it is important that all our written communications be prepared with care and with the understanding that they could one day be made public. While we enjoy freedom of speech and all legal entitlements to communicate, we must also be careful not to post anything to social media accounts that defames the company, disparages suppliers or customers, reveals confidential information, or violates Shorcontrol Safety’s data protection and privacy policy.

5.10 Self-dealing and Interacting with Connected Persons

Our own personal interests and relationships should never interfere with our workplace responsibilities. Therefore, it is inappropriate for anyone to supervise relatives or close friends, be in a direct reporting relationship with them or materially influence their performance evaluation or compensation.

It is also not appropriate to be in a position to hire, evaluate, provide funding to, or enter into contracts or other business relationships with a relative or close friend or a business in which either we or close relatives or friends have a significant interest. Particularly if our work decisions may be affected, or appear to be affected, by the position or interests of our relative or close friend, or by any significant interest that any have in another business, we must disclose these situations in accordance with our Conflict-of-Interest Policy. We must also comply with any measures that may be put in place to ensure all such dealings and decisions are made based on a fair and transparent basis.

Our commitment to self-dealing and interactive with connected persons is further explained in our *Conflict-of-Interest Policy*.

5.11 Outside Positions

To help with the success and growth of Shorcontrol Safety, we must devote our full time and attention to our jobs during working hours. Therefore, we may not accept outside commitments that would reduce the time and attention we can devote to our jobs. Unless it has been disclosed in accordance with our Conflict-of-Interest Policy, and necessary authorisations have been obtained, we are prohibited from

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accepting paid or unpaid positions that might pose a conflict of interest with Shorcontrol Safety or give the impression of such a conflict.

5.12 Gifts and Entertainment

Our relationships with all our business partners must be based on integrity and sound business judgement. As a result, if we give or perceive gifts or entertainment (which could be anything of value), we must be careful. Offering or receiving business gifts or entertainment is often an appropriate way for businesses to display courtesy and respect for each other, provided they are reasonable in value and not intended to influence a business or government action.

Except where prohibited by law, Shorcontrol Safety may offer and accept reasonable business gifts and entertainment to and from associates, provided that the gifts and entertainment are modest in value and appropriate under the circumstances.

6. Responsibilities

Employee Title/Classification	Responsibility
Directors, Top Management & Senior Management	To ensure the necessary resources are available within the organisation for the implementation of this policy. To ensure the contents of this policy are implemented effectively. To investigate and act upon any breaches or violations which may arise or be reported from individuals citing behaviour related to this policy.
Employees/ Staff/ Instructors/ Sub-contractors	To adhere to the requirements set out in this policy. To report any breaches or violation of this policy to top/senior management for investigation and resolution.
Learners/ Delegates	To adhere to the requirements set out in this policy. To report any breaches or violation of this policy to instructor/employees/staff for investigation and resolution.

7. Enforcement

Employee Title/Classification	Responsibility
General Manager	Has the discretion of determining the repercussion on the discovery of any member of staff, tutors, managers, visitors, or subcontractor's unacceptable behaviour related to this policy. Has the discretion of determining the repercussions on the discovery of a manager or assigned responsible personnel's failure to enforce or follow this policy or its procedures.
Managers and Heads of Departments	Has the discretion of determining the repercussions on the discovery of any subordinate or learner's unacceptable behaviour related to this policy.

8. Related Information and Documents

Document ID	Title
GEN-POL-002	Environmental, Health & Safety Policy



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GEN-POL-003	Equality, Diversity & Inclusion Policy
GEN-POL-004	Organisation Chart
GEN-POL-005	Job Roles & Responsibilities
GEN-POL-006	Whistle-blower & Anti-retaliation Policy
GEN-POL-007	Social media & Internet Usage Policy
GEN-POL-008	Hours of Work, Absences & Holidays Policy
GEN-POL-009	Drugs & Alcohol Policy
GEN-POL-010	Data Protection & Privacy Policy
GEN-POL-011	Conflict of Interest Policy
GEN-POL-012	Cyber-Security Policy
GEN-POL-013	Anti-corruption, Anti-bribery & Anti-trust Policy
GEN-POL-014	Employee Benefits Policy
GEN-POL-015	Careful Communications Policy
GEN-POL-016	Conformance to Legislative Obligations
GEN-POL-019	Inclusive Non-Threatening & Non-Abusive Language Policy

9. Policy Review

This policy shall be reviewed when:

- There is a change of General Manager at Shorcontrol Safety.
- There is a change in any of the related policies or procedures found in section 8. *Related Information & Documentation* of this document.
- As prescribed in Shorcontrol Safety's policy and procedure review schedule.
- As determined or requested by the General Manager at Shorcontrol Safety.

Revision Date	Author with Title	Description
02/03/2023	Angela Byrne, QHSM	Initial draft and release of document.



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14/08/2023	Angela Byrne,QHSM	Update of 'Related documents & Information' section.
14/08/2024	Angela Byrne,QHSM	Minor update of phrasing in section 5.5.
14/08/2025	Angela Byrne,QHSM	Inclusion of GEN-POL-016 to table in section 8.
21/01/2026	Angela Byrne,QHSM	Inclusion of GEN-POL-019 to Section 8.