

	Document Title	Careful Communications Policy		
	Doc. Number	GEN-POL-015	Doc. Owner	General Manager
	Author	Angela Byrne	Revision	Rev. 02
	Reviewed by	Angela Byrne	Approved by	Fiona Spillane
	Next Review Date	14/08/2026	Approved Date	14/08/2025

1. Policy Statement

At Shorcontrol Safety we encourage our employees to be professional and clear in all communications and to carefully consider the best way to communicate. Depending on complexity, urgency and sensitivity, different matters will require different approaches to communication, such as in-person meetings, phone calls, electronic or virtual communications on various platforms. Each type of communication must be suitable for certain purposes, and our employees must take due time to consider what type best fits the situation.

2. Purpose

The purpose of this policy is to help employees and other people who act on Shorcontrol Safety's behalf, understand the importance of being careful and professional in all elements of communication. In doing so this will help protect the individual and Shorcontrol Safety from any potential negative consequences of poor communications.

3. Scope

The scope of this policy covers written communication including electronic forms, the sharing of company information and personal data, and is applicable to all employees and people communicating on behalf of Shorcontrol Safety and its business activities.

4. Definitions

Term	Definition
Communications	Any method of sharing or sending information between people and places, particularly using phones, computers, text, social media etc.
Legal Privilege	Communication between a person and a legal representative of Shorcontrol Safety that could relate to legal advice, litigation etc.

5. General Policy Guidelines

5.1 Standards of Communication

When sending out written communication, the following must be ensured:

- Know and verify your audience. Check the recipients of the communication – review email addresses carefully and be mindful of the 'Reply All' feature.
- Understand the role of each recipient of the message and do not send any more information (including attachments) than necessary. Keep internal company messages within Shorcontrol Safety.
- Be professional in all your communications. Ensure that the content and tone of your message is appropriate.
- Provide all necessary context and consider what the reaction might be if your communication was disclosed publicly in any way.
- Exercise extreme caution when/if communicating with any competitors.

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- Respect privacy, confidentiality, and legal privilege (where applicable). A legally privileged communication is one between you and a legal representative of Shorcontrol Safety that could relate to legal advice, litigation etc.

5.2 Helpful Tips

Be cautious of...

- Any communication that includes competitively sensitive information or that may be interpreted as an attempt to coordinate with competitors in a way that lessens competition, such as communications about pricings, allocating markets or customers or any other topic that might violate Shorcontrol Safety’s Anti-bribery & Anti-Trust Policy.
- Providing opinions outside your area of knowledge or expertise – do not assume or speculate. Clearly state information about which you have firsthand knowledge. Involve others to address areas outside your area of knowledge or expertise.
- If you are unsure whether a topic you are communicating about could raise legal issues, involve your General Manager, and mark the communication as ‘Confidential’.
- Communications made via social media – employees and other persons acting of Shorcontrol Safety’s behalf are expected to refrain from disparaging the company or disclosing any confidential information. This duty extends to social media.
- Communications made via social media should not be considered private, regardless of the users’ settings.

Never...

- Over compromise – be factual.
- Send messages when upset, rather save as a draft for a period and review it under more positive circumstances before sending. Consider obtaining a second opinion.
- Discuss other stakeholders in a negative manner – be professional.
- Send or forward any communications that are discriminatory or harassing in nature. If you receive such communication, seek assistance from your direct manager or the General Manager.

5.3 Company Disclosure

Unless required for the performance of their duties, employees should not discuss company matters which constitute ‘non-public information’ with any person (including family, friends, and other employees not on a need-to-know basis).

In addition, Shorcontrol Safety employees are not authorized to discuss company matters with the media, industry professionals, competitors, or Shareholders unless they are ‘authorised persons.’

5.4 Data Privacy & Protection

- Always remember that communication includes personal information which must be protected by Shorcontrol Safety.
- Personal information shall only be disclosed to the amount necessary for the purpose and only to authorised personnel.
- To reduce risk of any data security incidents from happening it is important to comply with the company’s data security policy and procedures.

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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-001	Code of Conduct & Ethics Policy
GEN-POL-007	Email, Internet & Social Media Use Policy
GEN-POL-010	Data Protection & Privacy Policy
GEN-POL-012	Cyber Security Policy
GEN-POL-013	Anti-corruption, Anti-bribery & Anti-trust 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.

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- 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
13/03/2023	Angela Byrne,QHSM	Initial draft & release of policy.
14/08/2023	Angela Byrne, QHSM	Update of ‘Related documents & Information’ section.
14/08/2024	Angela Byrne, QHSM	Review – no changes
14/08/2025	Angela Byrne, QHSM	Review – no changes