

Policy Name: **Confidentiality**

Policy Number: **4.03**

Date: **February 2023**

POLICY STATEMENT:

JC Steele has built a large amount of information regarding systems and processes, customer and client information, procedures, trade secrets, product information, partner information and ideas.

JC Steele relies on the confidentiality of its information and operations to ensure ongoing success of the business. All JC Steele employees are expected to keep all information regarding JC Steele confidential.

PROCEDURES:

- a. Each employee is to treat all customer, financial and commercial information relating to JC Steele and its activities as privileged and confidential. No such information is to be disclosed to any outside party at any time, without the prior approval of the Managing Director.
- b. In accordance with the JC Steele Sales, Service and Representation Standards, no drawings or technical details are to be provided to customers, or shared outside the JC Steele Australia and JC Steele Statesville groups without the written approval of the Managing Director
- c. No employee is to remove any confidential information (physical or digital) from the JC Steele premises, except where there is a genuine reason to do so, related to the operation of JC Steele and only after permission from the Managing Director. This includes any information regarding customers, business partners or employees, including names, phone numbers, addresses, email addresses and credit card details.
- d. Employees will keep in confidence information that has been obtained in the course of their employment and service, unless disclosure serves professional purposes or is required by law.
- e. No employee of JC Steele is permitted to give an interview or provide any information to any media representative without the express approval of the Managing Director.
- f. Employees must be careful when using electronic messaging containing confidential information to ensure that the messages are not inadvertently sent to the wrong address.
- g. Any employee breaching confidentiality will be subject to disciplinary action which, subject to the seriousness and intention of the breach, could include termination of employment.