

SOCIAL MEDIA POLICY

1. Policy

The Company respects the right of its employees, as private citizens, to engage in public debate on political and/or social issues, whether on the radio, the internet, in newspapers or on television. This extends to employees' use of social media sites.

At the same time, the Company expects that all of its employees will fulfil their obligations as employees and uphold the expected level of professional conduct and ethical behaviour when using social media. It is critical that employees of the Company exhibit a high standard of professional conduct to maintain public confidence in the Company's operations and reinforce the corporate values of transparency, accountability, respect and responsibility.

The use of social media during work hours is prohibited unless employees have appropriate authorisation for work-related use.

Further, with respect to the use of social media outside of work hours, the Company will take disciplinary or other action against its employees in regards to inappropriate use of social media even when the employee is not on duty. Accordingly, action can be taken against employees in relation to content that is posted on social media sites outside of work hours.

Employees need to be mindful that content posted on such sites is as public as if published in a newspaper or discussed at a public forum and has the potential to be broadcast across the entire internet

2. Purpose

The purpose of this policy is to ensure that Company employees understand their obligations when using social media (such as Facebook) and are informed of the importance of managing the risks associated with such use that may impact on the reputation of the Company and/or the safety of its employees, and that may result in a breach of the Company's Code of Conduct and policies, procedures or instructions.

This policy is for the mutual protection of the Company and its employees and is not intended to prevent, discourage or unduly limit employees' expression of personal opinion or online activities.

3. Scope

This policy applies to all employees of the Company (referred to hereafter as employees).

This policy covers, but is not limited to, the sites and services mentioned below, and is also intended to cover other social media services as they develop in the future:

- social networking sites (eg Facebook);
- professional networking services (eg LinkedIn);
- video and photo sharing websites (eg YouTube, Instagram, TikTok);
- micro-blogging (eg Twitter);
- forums and discussion boards (eg Google Groups);
- online collaborations (eg Wikipedia);
- podcasting;
- blogs including corporate blogs and personal blogs;

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- blogs hosted by traditional media outlets.

4. Definitions

4.1. Social media

Social media includes the various internet-based applications that allow the creation and exchange of user-generated content. Social media enables individuals to communicate via the internet sharing information and resources. Sites such as Facebook are a social utility that connects people with family and friends.

4.2. Content

Content is the information that is put onto social media sites, which includes text, audio, video, images, podcasts and other multimedia communications.

5. Procedural instructions regarding employee use of social media

5.1. Public comment

The Company employees, as private citizens, can engage in public debate on political and/or social issues, whether on the radio, the internet, in newspapers, on the television or social media sites.

In such circumstances, employees should not:

- make comment as a representative of the Company unless authorised to do so;
- identify themselves as an employee of the Company unless authorised to do so; or
- make comment, regardless of the connection with the employee's duties, that amounts to criticism sufficiently strong or persistent to give rise to a public perception that an employee is not prepared to implement or administer the policies of the Company as they relate to their duties.

5.2. Bullying and harassment

Just as bullying and harassment will not be tolerated in the workplace, nor will it be tolerated where it occurs on a social media site. This is regardless of whether it occurs on duty or outside of work hours.

In this regard, employees are not to post any adverse or critical content about any other employee or individual on social media sites such as offensive, obscene, bullying, discriminatory, hateful, racist, sexist, abusive, harassing, threatening or defamatory content.

In such circumstances, not only is it likely that disciplinary action will be taken against the perpetrator (which could include dismissal), but that such content may also amount to civil proceedings giving rise to the perpetrator being sued for damages or charged with a criminal offence. Employees may be held personally liable in relation to any ensuing litigation arising from such content being posted.

The Company reserves the right to request that certain posts and inappropriate comments be removed from an employee's social media site.

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5.3. Conflicts of interest

A conflict of interest may arise from associations made through social media. This is when an employee's personal interest could influence, or be perceived as being influenced, in the performance of their official duties and responsibilities. This relates to associations that may be considered contrary to the role of the employee and/or the operations of the Company.

Employees are required to declare a conflict of interest.

5.4. Confidentiality of information

Employees are not to divulge or discuss any confidential or personal information obtained as an employee of the Company. This includes information regarding the Company operations, business, clients, services, prices, financial position, security, or activities.

Employees are not to identify any other employee or publish personal details and/or images about them without their permission.

5.5. Use of Company email or logo

Under no circumstances are employees to use the Company email addresses or logos as part of their personal social media activities or post images of themselves or any other employee in uniform or exercising official duties.

6. Security risks

Social media sites can contain a significant amount of personal information. Accordingly, it is in the best interests of employees to ensure appropriate and effective security and/or privacy settings are established, where available, to allow restricted access to their sites. Employees, however, need to be mindful that regardless of the security/privacy settings, content may still be made public (eg a contact may cut and paste comments onto another site) or may be illegally accessed by cybercriminals.

Furthermore, unintended invitees may gain access to a social network site through a linked association (eg friend of a friend). Some individuals and organisations, including criminal organisations, use social media to mask their true identity and obtain personal information.

It is recommended that employees exercise caution with respect to the type of information that they post on such sites.

7. Reporting

It is expected that all employees will comply with this policy. Employees who fail to comply with this policy may be subject to counselling, directions to withdraw posted material, or disciplinary action, which may include dismissal.

All employees have an obligation to immediately report any breach of this policy to the Coordinator. The Coordinator is to report any breach of this policy or seek advice from the senior management.

Employees should speak with the Coordinator if they have any concerns regarding this policy.