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P-HSM-SPU-003

Social Media Policy – Newcastle Yard

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[This procedure is property of Smulders, Hoge Mauw 200 – B-2370 Arendonk]

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1 PURPOSE

This policy is in place to minimise the risks to Smulders Projects UK (**Company**) through use of social media.

This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Wikipedia, Whisper, Instagram, Tumblr and all other social networking sites, internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may affect our business in any way.

This policy covers all employees, officers, consultants, contractors, casual workers and agency workers hereinafter referred to as workers. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Additionally, the Company supports the use of social media within the Company for business related activities.

The Company is confident that workers will deal responsibly with social media and workers should adhere to the rules set out within this policy when engaging with social media whether for personal use or as part of their role with the Company.

2 CODE OF CONDUCT

This code of conduct regulates the conduct of both the use of social media in the workplace and beyond. Workers should be aware that any information that they may share, including statements or views on social media during their private time may adversely affect the Company or the Smulders Group.

3 RULES & REGULATIONS

Workers should always respect the following rules whilst using social media, not only within working hours, but outside of working hours, too.

Office based workers are permitted to use social media during working hours, provided that such usage is work related and adheres to this policy.

Yard based workers are permitted to use social media during any breaks (e.g. coffee / lunch break) provided this usage adheres to this policy.

1. Workers are always personally responsible for the content of the information they post on social media. They should be aware that the information they disseminate via social media is 'public' and the far reaching effects it may have for them and for the Company or the Smulders Group.
2. Whilst using social media, workers must give due attention to the privacy settings of the relevant social media platform.
3. Workers should not share information, statements or points of view that:
 - contain or otherwise disclose information which is confidential to the Company or the Smulders Group, their staff, customers, suppliers and business partners;
 - are detrimental, defamatory or disparaging of any company within the Smulders Group, its staff or any third party;
 - amount to harassment, bullying or unlawful discrimination against staff of third parties;
 - amount to false or misleading statements;
 - impersonate colleagues or third parties.
4. Workers must avoid making any social media communications that could damage the Smulders Group's business interests or reputation, even indirectly.
5. Workers must not post comments about sensitive business-related topics, such as the Company's performance, or do anything to jeopardise our trade secrets, confidential information and intellectual

property. Workers must not include our logos or other trademarks in any social media posting or in your profile on any social media..

6. Workers must not disclose the names of colleagues, customers, suppliers or partners of the Smulders Group, where directly related to their relationship with the Company or the Smulders Group without having obtained the prior permission of those involved / concerned and the Company Director.
7. Workers must not express opinions on our behalf via social media, unless expressly authorised to do so in advance by the Company. Workers may be required to undergo training in order to obtain such authorisation.
8. Any workers who are authorised by the Company Director to speak on behalf of the Company, should make their relationship to the Company clear by identifying their position within the Company.
9. Workers can only create a Company group or network on a social media platform if they have previously obtained the consent of the Company Director.
10. Workers shall always respect the privacy of others, including, for example, the right of distributing an image. Photos should not be placed on social media without the explicit consent of the person(s), and any such postings must always be in compliance with the requirements of point 4.
11. Workers must show respect for colleagues and will not spread / disclose information through social media that could harm the dignity and privacy of others.
12. If a worker is uncertain or concerned about the appropriateness of any statement or posting or whether it would constitute a breach of this code of conduct, he/she should refrain from posting it until they have discussed it with a supervisor.
13. If a worker sees social media content that disparages or reflects poorly on the Company, he/she should notify a supervisor.
14. Worker must, upon the request of the Company, immediately remove any content from the relevant social media site(s) that we consider to constitute a breach of this policy. Failure to comply with such a request may lead to formal action, up to and including termination.

4 MONITORING AND SANCTIONS

The Company reserves the right to monitor the use of social media by workers affiliated with the Company or the Smulders Group. Violations of this policy may result in action being taken against individuals by the Company in accordance with their contractual arrangements. The Company, where necessary, will liaise with the relevant agency or subcontracting company regarding violations of this policy.

5 COMPLIANCE WITH OTHER POLICIES

This Policy should be read in conjunction with:-

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| P-HSM-SPU-001 | Yard Agreement |
| P-HSM-SPU-011 | Code of Conduct |
| P-HSM-SPU-002 | Mobile Phone Policy |