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|  | NAME        | <b><u>Social Media Policy</u></b> |
|  | REF         | PS-003-WB                         |
|  | ISSUE DATE  | 13/02/2025                        |
|  | REVISION NO | 1                                 |
|  | PREPARE BY: | SM                                |
|  | APPROVE     | RM                                |

### **Policy Statement**

The Company recognises that many of its employees are members of many various social media networking sites including Facebook, Twitter, YouTube, LinkedIn, Snap Chat, Instagram and many more

### **Purpose**

This policy is intended to encourage staff to make appropriate decisions about the information they provide on social media websites and social networks.

### **Who does the policy cover?**

This policy covers all individuals working at all levels within the Company including directors, managers and employees.

### **Scope of the policy**

All staff members are expected to adhere to this policy at all times in order to protect the privacy, confidentiality, and interests of our company and services, employees, clients and competitors.

Any breaches of the policy may result in disciplinary action taking place, and in serious cases, may be treated as gross misconduct leading to summary dismissal.

### **What is social media?**


For the purposes of this policy, social media is any online platform or app that allows parties to communicate instantly with each other and to share data and content in a public forum that can be accessed worldwide.

Social media activities can include, but are not limited to:

- maintaining a profile page on social/business networking site;
- writing or commenting on a blog, whether it is your own or the blog of another person;
- taking part in discussions on web forums or message boards;
- leaving product or service reviews on business websites or client review websites;
- taking part in online polls;
- sharing content or posts; and
- Social media also covers video and image-sharing websites

### **Terms of use for social media**

When using social media you should never post information that could bring the company's reputation into disrepute. All employees are permitted to share company information on social media if it relates to UED related products, promotions or events. You are encouraged to positively support the company, its products and suppliers. However, when sharing information employees

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must never breach our confidentiality policy. The general rule of thumb is if you are in doubt about a post do not post it.

The following terms should be adhered to at all times, including during periods of leave.

You should ensure that your content, or links to other content, does not:

- interfere with your work commitments
- contain libellous, defamatory, bullying or harassing content
- contain breaches of copyright and data protection
- contain material of an illegal, sexual or offensive nature
- include confidential information to the company
- bring the company into disrepute or compromise the company's brand and reputation
- use the company to endorse or promote any product, opinion or political cause.

If content published by you or others implicates you in the breach of these terms, it may lead to an investigation and disciplinary action in accordance with the company's disciplinary policies.

### **Rules for the use of social media**

Do not upload, post, forward, or post links to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content.

Any employees who feel they have been harassed or bullied, or are offended by material posted by a colleague should inform their supervisor/manager.

Never disclose commercially sensitive, anti-competitive, private, or confidential information.

You are personally responsible for the content you publish. Be aware that what you publish will be public for many years.


If you notice any content posted on social media regarding the company that you feel is inappropriate, please report it to a member of management.

### **Defamation**

You should not send or circulate any materials on social media that contain negative remarks about other persons or Companies unless you are very sure that what you are saying is not defamatory and is factually correct. If in doubt, do not send.

### **Obscene Materials**

You should not under any circumstances use the company's e-mail system or internet to access, display, circulate or transmit any material with a sexual, violent, graphic or discriminatory content. This may constitute a criminal

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offence and both you and the company could be liable. Likewise, you should not use social media to access same. Doing so would be subject to investigation and possible disciplinary action.

The display on screen of material with a sexual content and/or its transmission to another may also amount to sexual harassment – for which you could be liable.

### **Protection of Personal Data**

The company is required to comply with legislation concerning the protection of personal data. Failure by the company to adhere to that legislation could expose the company to civil liability and to enforcement action by the data protection authorities.

The obligations of the company are complex but you can help ensure compliance by adhering to the following rules:

- Do not disclose any information about a person on social media, which you would object to being disclosed about yourself.
- Be particularly careful when dealing with information concerning a person's gender, civil status, family status, age, disability, race/ethnicity, sexual orientation, religious belief or any membership of the traveller community, health or financial matters.
- Do not send any personal data outside the European Union or the UK.

### **Bullying and Harassment**


The company intends that all employees will be treated with dignity at work, free from harassment and bullying of any kind. Harassment via social media could include sending sexist or religious jokes, making sexual propositions or general abuse.

### **Recording and Monitoring**

Monitoring will only be carried out to the extent permitted by law and as necessary and justifiable for business purposes.

In particular, uploading, posting, forwarding, or posting a link to any of the following on a social networking site whether professionally or personally, will amount to gross misconduct (this list is not exhaustive):

- Pornographic material
- A false and defamatory statement about any employee or the Company itself
- Material which is offensive, obscene, criminal, discriminatory, derogatory, or may cause embarrassment to us, our clients, or our staff

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- Confidential information about us, any of our employees or clients
- Any other statement which is likely to create any liability
- Material which invades the privacy of any person

Where evidence of misuse is found, a more detailed investigation may take place, which could potentially become a disciplinary matter.

If you notice any use of social media by other members of staff in breach of this policy please report it to a supervisor or member of management.

### **Monitoring use of social media during work time**

The company reserves the right to monitor employees' use of social media on the company's equipment. The company considers that valid reasons for checking an employee's internet usage include suspicions that the employee has:

been using social media when he/she should be working; or  
acted in a way that is in breach of the rules set out in this policy.

Monitoring will be conducted in accordance with an impact assessment that the Company has carried out to ensure that monitoring is necessary and proportionate. Monitoring is in the company's legitimate interests and is to ensure that this policy on use of social media is being complied with.


Monitoring will consist of checking the social media sites that an employee has visited, the duration of such visits and the content that the employee has contributed on such sites.

Monitoring will normally be conducted by the Company's security team. The information obtained through monitoring may be shared internally, including with members of the HR team, an employee's line manager, managers in the business area in which the employee works and IT staff if access to the data is necessary for performance of their roles. However, information would normally be shared in this way only if the Company has reasonable grounds to believe that there has been a breach of the rules set out in this policy.

The information gathered through monitoring will be retained only long enough for any breach of this policy to come to light and for any investigation to be conducted. Data is normally securely destroyed after 4 weeks, depending on the reasons for monitoring.

Information obtained through monitoring will not be disclosed to third parties (unless the Company is under a duty to report matters to a regulatory authority or to a law enforcement agency).

Workers have a number of rights in relation to their data, including the right to make a subject access request and the right to have data rectified or erased in some circumstances. You can find further details of these rights and how to exercise them in the Company's data protection policy. If workers believe that

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the Company has not complied with their data protection rights, they can complain to the Information Commissioner.

### **Breaches of policy**

Where it is believed that an employee has failed to comply with this policy, they will be subject to the disciplinary procedure. If the employee is found to have breached the policy, they may face a disciplinary penalty ranging from a verbal warning to dismissal. The penalty applied will depend on factors such as the seriousness of the breach; the nature of the posting; the impact it has had on the Company or the individual concerned; whether the comments cause problems given the employee's role; whether the employer can be identified by the postings; other mitigating factors such as the employee's disciplinary record etc. You may be required to remove any social media content that the Company considers to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.