

L2.HUR-GL-POL-0018-GB

# SRG SOCIAL MEDIA POLICY

Revision : 3.0, May 2, 2024

| SECTION | EDITION | REVISION | DATE          | CHANGE DESCRIPTION                               | AUTHOR | APPROVER |
|---------|---------|----------|---------------|--|--------|----------|
| ALL     | 3       | 0        | May 02, 2024  | NEW COMPANY NAME,<br>LOGO, CONTENTS<br>UNCHANGED | AS     | BU       |
| ALL     | 2       | 0        | May 18, 2023  | Contents Updated                                 | DL     | MB       |
| ALL     | 1       | 0        | Jan. 01, 2010 | New Document                                     | LR     | MB       |

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| <b>TITLE :</b> SRG SOCIAL MEDIA POLICY      |   | <b>EDITION :</b> 3                             | <b>PAGE :</b> 1 of 6              |
|   |   | <b>REVISION :</b> 0                            |                                   |
| <b>DOCUMENT LEVEL :</b><br>BUSINESS UNIT    | <b>BUSINESS UNIT :</b><br>HUMAN RESOURCES | <b>SERVICE LINE :</b><br>GENERAL               | <b>Document Group :</b><br>POLICY |

## 1. INTRODUCTION

SITE Resource Group Limited Partnership (SRG) recognize that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media platforms, such as Facebook, Twitter and LinkedIn. However, use of social media by those working at or with SRG can pose risks to its confidential and proprietary information, and reputation, and can jeopardize its compliance with legal obligations.

To minimize these risks, to avoid loss of productivity and to ensure that SRG IT resources and communications systems are used only for appropriate business purposes, SRG expects all SRG Personnel to adhere to this Policy.

This Policy does not form part of any SRG employee's contract of employment and it may be amended at any time.

## 2. WHO IS COVERED BY THIS POLICY?

This Policy applies to all individuals working at or with SRG at all levels and grades, including:

- employees
- contractors
- direct service providers
- consultants
- subcontractors
- agency staff
- third parties who have access to SRG electronic communication systems and equipment

together referred to as “**SRG Personnel**”.

## 3. SCOPE & PURPOSE OF THIS POLICY

SRG strives to maintain a positive image in the community and ensure that all SRG Personnel are aware of their responsibility to respect and maintain SRG's positive image, whether it be within the workplace, online or at any event where they represent SRG.

This Policy is in place to:

- guard against the risks SRG may face through the use of social media.
- protect SRG's reputation and resources, its customers and its Personnel from irresponsible or illegal activities.

Initial Issue Date – 6<sup>th</sup> February 2019  
 Latest Revision Date – 2<sup>nd</sup> May 2024

Authorized by Chris Martineau, SRG CEO

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| DOCUMENT NO. : L2.QUA-GL-BMN-0000-CC |                              | PARENT DOCUMENT : L1.QMS-GL-SMN-0000-UC |                               |
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- ensure the privacy, security and reliability of SRG’s network and systems as well as the systems of SRG’s clients and affiliates.
- establish guidelines for acceptable use of SRG’s network, trademarks, intellectual property and confidential information.
- generally define those actions which are considered potentially abusive and/or prohibited.
- outline procedures for the acceptable monitoring of online communications of employee computer/email use at work and handling and reporting abusive and/or prohibited matters to SRG.

This Policy deals with the use of all forms of social media, including, but not limited to:

- Facebook
- LinkedIn
- Twitter
- Google+
- Wikipedia
- Instagram
- TikTok
- Dating Apps
- Tumblr
- All other social networking sites, internet postings, forums, blogs and email

These activities bring certain risks, some of which may involve potential legal and financial liabilities for both SRG and SRG Personnel, including but not limited to:

- introducing viruses into the SRG’s systems
- breaching copyright and licensing
- breaching data protection rights
- breaching confidentiality and security
- defamation
- bullying, harassment and discriminatory conduct

The Policy applies to the use of social media for both business and personal purposes whether during office hours or otherwise and regardless of whether or not the social media is accessed using SRG facilities and equipment or equipment belonging to SRG Personnel.

All SRG Personnel must read this Policy carefully and ensure that they use the internet, emails and other forms of SRG’s communication systems in accordance with it.

All external media responses are to be directed to the SRG Communications Team, CFO or CEO.

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## 4. POLICY

SRG Personnel who create or contribute to blogs, or forums, or who are responsible for social media pages or accounts must comply with the following code of conduct:

- a) Use of social media during working hours must be restricted to business and professional purposes; must not interfere with any SRG Personnel's role and responsibilities and should always comply with the contents of this Policy.
- b) Personal use of social media using any of SRG's computers, networks and other IT resources and communications systems must be very limited in scope, must not interfere in anyway with any SRG Personnel's role and responsibilities and must comply with this Policy (and other relevant SRG policies).
- c) SRG Personnel must ensure that no confidential, proprietary, copyrighted, trade secrets or other sensitive information related to SRG, its customers, suppliers or other relevant third parties for which SRG may hold confidential information appear on, or is referred to, on any social media site (including blogs, forums and emails), unless specific written permission has been obtained from the SRG CEO or CFO.
- d) SRG Personnel must not engage in discussions on social media (including blogs, forums and emails) regarding competitors' products, legal issues in which SRG is involved, or government issues related to SRG and its industries without prior approval from the SRG CEO or CFO.
- e) SRG Personnel are discouraged from adding business contacts made during his/her engagement with SRG to his/her social media accounts, but if they wish to do so, they should carefully consider the personal and professional implications in the first instance.
- f) SRG Personnel must not include SRG's logos or other trademarks in any social media posting (including blogs, forums and emails) or any individual's profile on any social media (including blogs, forums and emails) unless they are displayed on SRG branded and issued goods and being used strictly in a professional and business setting where SRG Personnel are representing SRG.
- g) SRG Personnel must ensure that they do not use inappropriate language, make inflammatory comments, disparage, libel, slander, intimidate, bully, unlawfully discriminate against, harass or threaten anyone on any social media site (including blogs, forums and emails).
- h) SRG Personnel must not express or respond to political views or opinions on social media (including blogs, forums and emails).
- i) SRG Personnel must not make comments which are negative, derogatory; misleading or false about SRG, its employees, management, suppliers, customers, affiliates or competitors on any social media site (including blogs, forums and emails).
- j) SRG Personnel must not impersonate another employee, management, vendor, customer, affiliate or competitor on any social media site (including blogs, forums and emails).

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- k) SRG Personnel must not express opinions on SRG’s behalf via social media (including blogs, forums and emails) unless expressly authorized to do so by the SRG CEO or CFO.
- l) If any SRG Personnel are uncertain about the propriety of public communication over a social media site (including blogs, forums and emails), they should contact and get the written approval of the SRG CEO or CFO before making such communications.
- m) SRG Personnel should make it clear in social media postings (including blogs, forums and emails), or their profile, that they are speaking or acting on their own behalf by writing in the first person and only using a personal email address.
- n) If any SRG Personnel discloses their affiliation with any part of SRG on their profile or in any social media postings (including blogs, forums and emails), the individual must explicitly and clearly state that their views do not represent those of SRG. SRG Personnel should also ensure that their profile and any content posted are consistent with the professional image SRG wants to present to its employees, vendors, customers, affiliates or competitors.
- o) SRG Personnel are required to respect copyrights and never post text, images or video created by someone else without proper attribution and/or authorization. If anyone has any question about copyright law and/or the usage of certain media, they are to contact the SRG Communications Team.
- p) Social Media is not a substitute for inter-company communications. Important information should be transmitted within normal company communication channels (i.e. the company’s email platform), and not through social media outlets.
- q) q) If any SRG Personnel discovers any social media group(s) that users have formed to discuss SRG, its products, or services, such SRG Personnel are required to bring them to the attention of the SRG CEO or CFO.
- r) If any SRG Personnel sees social media content that disparages or reflects poorly on SRG or otherwise contravenes the terms of this Policy (or other relevant policies including those on confidentiality and email and internet use) then they should contact the SRG CEO or CFO.
- s) SRG Personnel are prohibited from speaking on behalf of the organization, releasing confidential information, releasing news, or communications as a representative of the organization without express prior written authorization from the SRG CEO or CFO.
- t) All SRG policies governing the use of copyright materials, corporate logos and other forms of branding and identity, apply to all social media postings (including blogs, forums and emails).
- u) SRG Personnel are strictly prohibited from the use of SRG-owned computer resources for use in the illegal download or upload of copyright materials.

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**5. ROLES & RESPONSIBILITIES**

The Board of Directors of SRG is responsible for releasing any organizational information, news, or providing any comment on behalf of SRG. Any requests for comment on behalf of SRG made by external parties should be directed to the SRG CEO or CFO promptly via the SRG Communications team.

**6. CONSEQUENCES OF BREACHING THE POLICY**

Any breach of this Policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether SRG equipment and facilities are used for the purpose of committing the breach.

SRG Personnel may be required to remove internet postings which are deemed to constitute a breach of this Policy. Failure to comply with such a request may result in disciplinary action.

**7. MONITORING & REVIEW**

The contents of SRG’s IT resources and communications systems are SRG property. Therefore, SRG Personnel should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems.

SRG reserves the right to monitor, intercept and review, without further notice, SRG Personnel activities using its IT resources and communications systems, including but not limited to social media postings and activities, to ensure that its rules are being complied with and for legitimate business purposes and SRG Personnel consent to such monitoring by their use of such resources and systems. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.

SRG may store copies of such data or communications for a period of time after they are created and may delete such copies from time to time without notice.

Do not use SRG’s IT resources and communications systems for any matter that you wish to be kept private or confidential from the organization.

This Policy has been approved by SRG CEO and no part of this document may be amended without the written approval of SRG CEO. This Policy will be reviewed by the SRG Communications Team and approved by the SRG CEO on a regular basis.

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