

### Social Media

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AmcoGiffen (Amalgamated Construction Ltd and Giffen Group Ltd) recognises that Social Media is changing and influencing the manner in which we communicate and share information relating to both our work life and our personal life.

By its very nature, Social Media resides very much in the public domain and it provides a permanent record of comments made and opinions expressed. Public perception can often be considered to be reality, and the borders between what is considered public or private, personal, or work related can become distorted. As such, Social Media should be utilised in a careful and considerate manner - especially where any reference to the Company is envisaged.

For the purposes of this Policy:

- **Social Media** is defined as interactive online media that allows parties to communicate with each other or to share data in a public forum such as (but not limited to) LinkedIn, Twitter, Facebook, YouTube, blogs, videos and image sharing websites.
- **Employee** is defined as any individual who is directly employed by the Company or any sub-contractor, agency worker or freelance worker contracted to and working on behalf of the Company.

Employees must be aware that the sharing of information on Social Media, even when not acting on behalf of the Company, could potentially damage the Company and/or colleagues if they are recognised as being one of our employees. Do not post comments that include discriminatory remarks, harassment, threats of violence, or similar content.

Never represent yourself as a spokesperson for the Company unless you are authorised to do so, and make it clear that your views do not represent the views of the Company and/or your operating unit, or its employees.

Employees therefore are strictly forbidden from posting on any Social Media site any comments, information, photographs or data relating to any Group Company, the Company, its Clients or its employees as defined above, unless prior written approval has been obtained from a Director of the Company as detailed below. This restriction is especially important in relation to the use of, or making reference to, any of the following:

- AmcoGiffen, AMCO or Giffen Group Company name or logos;
- AmcoGiffen, AMCO or Giffen Group copyrighted material;
- AmcoGiffen, AMCO or Giffen Group intellectual property;
- Any work on behalf of a Client, which is currently being undertaken or may have been completed;
- Company employees, including images of individuals who may not wish their picture to be displayed on Social Media;
- The disposal of any Company, or potentially Client owned, surplus assets.

## POL-HR-11 POLICY STATEMENT

When preparing and submitting a Company related Social Media posting for approval, the following guidelines must be followed:

- 1. Be Respectful** - Whilst personal views may be acceptable, comments must not be defamatory, libellous, discriminatory, harassing or infringe on any intellectual property rights; reference to or the reposting of inappropriate links and images must be avoided.
- 2. Respect Confidentiality** - You must ensure you maintain confidentiality. Carefully consider whether the information you intend to post reveals trade secrets or information owned by the Company, or any other group Company. Could any of the information be confidential about the business or about an individual? This includes Company information or business plans and strategy that has not been made public or contains information about meetings or activities involving the business or its representatives.
- 3. Copyright** - If you would like to use someone else's images or content, you must first obtain their permission to do so and include an acknowledgment. Quotations from others' work must be kept to a minimum and wherever possible, include a direct link to the original work.
- 4. Use Good Judgement and be Truthful** - Remember that you are personally responsible for what you post. Ensure that what you intend to say is truthful, well-judged and does not contain the potential to have unintended consequences. Assume that anything that you do post will be public, permanent and can probably be seen by anyone.

For the purposes of this Policy, Directors who can approve employee Social Media posts, relative to their business areas, are the Managing Director, Regional Managing Directors, Operations Directors and the Strategy & Development, Financial, Design & Engineering and HR Directors.

Employee requests to make Company related Social Media postings are to be forwarded to the Communications Manager in writing, stating the reason for the posting, and must include the full text of the proposed article, along with copies of any images and/or other links to be used. The Communications Manager will then liaise with the relevant Director(s).

Failure to fully comply with the above guidelines will certainly result in Director's approval to make a Company related post being withheld and may result in disciplinary action.

Sub-contractors, freelance workers and agency workers under contract to the Company should further note that they must not use Social Media to take direct credit on behalf of themselves or their own Company for work they have carried out on behalf of AmcoGiffen, AMCO or Giffen Group whilst directly engaged by AmcoGiffen, AMCO or Giffen Group.

In order to protect its professional credibility and brand image, the Company reserves the right to monitor the use of Social Media as well as other electronic communications made by employees, whether or not accessed for work purposes.

Subject to applicable law, employees should have no expectation of privacy whilst using Company equipment. However, nothing in this Policy is intended to prevent an employee from making disclosures encouraged or protected under law (including relevant employment legislation).

Employees should also be aware that the posting of any material whatsoever on any Social Media site that is unlawful, or could have a negative impact on the Company, its employees or Clients is an offence under the Company's Disciplinary Procedure.

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In addition, unlawful posts could potentially result in third parties instigating legal proceedings, against the individual posting the material.

If you leave the Company, you will be asked to change the branding of your accounts. This includes changing the name of your branded social media accounts and removing information from your bio that indicates you are a current employee of AmcoGiffen, AMCO or the Giffen Group. Any posts you then make that are in conflict with this Policy or portray AmcoGiffen, AMCO or Giffen Group in a defamatory light may result in legal action.



**John Booth**  
Managing Director