

# Social Media Policy Statement

This policy describes the rules governing use of social media at social media sites and services include (but are not limited to):

- ☐ Popular social networks like Twitter, Facebook, Kik, and Google+
- ☐ Professional social networks like LinkedIn
- ☐ Photographic social networks like Snapchat, Instagram, and Flickr
- ☐ Online review sites like Reevo and TripAdvisor

Other social media includes, but is not exclusive to, chat rooms, sharing and discussion sites, question and answer social networks, blogs, wikis, video, picture blogging, audio, message boards, electronic newsletters, online forums and other sites and services that permit users to share information 'real-time' with others.

This Policy applies to all individuals working for and on behalf of PWM UK Ltd at all levels and grades, including Directors, Senior Managers, employees, subcontractors, consultants, and agency staff, who use social media while working for the company whether for business or personal reasons.

It applies whether the social media use takes place on company premises and worksites, while travelling in relation to company business or while working from home.

Only authorised staff are permitted to post material on a social media website in the company name or on its behalf. Anyone who breaches this policy may be subject to disciplinary action, or in the case of subcontractors, consultants and agency staff, removed from the workplace.

Personal use of social media in the workplace is permitted, subject to certain conditions, as detailed below. It must not be abused or overused and PWM UK Ltd reserves the right to withdraw permission at any time.

The following conditions must be met for personal use of social media:

- ☐ Use must be minimal and take place substantially outside of normal working hours, for example, during breaks.
- ☐ Use must not interfere with business, office or workplace commitments or affect the ability of the user to perform their regular duties.
- ☐ Use must comply with all company policies including Disciplinary, Anti-Harassment and Bullying, Whistle Blowing and Data Protection.

You are also personally responsible for what you communicate on social media sites outside the workplace, for example at home, in your own time, using your own equipment. You must always be mindful of your contributions and what you disclose about the company.

Whenever you are permitted to use social media in accordance with this policy, you must adhere to the following general rules. The same rules would also apply when using social media outside of work:

- ☐ Never create or transmit material that might be defamatory or incur liability for PWM UK Ltd.
- ☐ Never use social media for any illegal or criminal activities.
- ☐ Do not post or forward a link to any abusive, discriminatory, harassing, derogatory, defamatory or inappropriate content,
- ☐ Any person working for, or on behalf of, PWM UK Ltd who feels that they have been harassed or bullied, have witnessed harassment or bullying of any individual or are offended by material posted by a work colleague onto a social media website, must inform their line manager, who in turn will inform Senior Management.
- ☐ Never disclose commercially sensitive, anti-competitive, private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with your line manager.
- ☐ Do not post material in breach of copyright or other intellectual property rights.
- ☐ Be honest and open, but be mindful of the impact your contribution might make to people's perceptions of PWM UK Ltd.

- ☐ You are personally responsible for content you publish – be aware that it will be public for many years.
- ☐ When using social media for personal use, use a disclaimer, for example: 'The views expressed are my own and don't reflect the views of my employer'. Be aware though that even if you make it clear that your views on such topics do not represent those of PWM UK Ltd your comments could still damage the company's reputation.
- ☐ You should avoid social media communications that might be misconstrued in a way that could damage the company's reputation, even indirectly.
- ☐ Do not post anything that your colleagues or PWM UK Ltd.'s Clients, Subcontractors and Suppliers would find offensive, insulting, obscene and / or discriminatory.
- ☐ If you have disclosed your affiliation as an employee, subcontractor or consultant of PWM UK Ltd, you must ensure that your profile and any content you post are consistent with the professional image you present to Clients and work colleagues.

Employees, subcontractors, consultants and agency staff should be aware that any use of social media websites (whether or not accessed for work purposes) may be monitored.

The company reserves the right to restrict or prevent access to certain social media websites if personal use is considered to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

IT and internet resources (including computers, smart phones and internet connections) are provided for legitimate business use. PWM UK Ltd therefore reserves the right to monitor how social networks are used and accessed through these resources. Any such examinations or monitoring will only be carried out by authorised staff.

Additionally, all data relating to social networks written, sent or received through PWM computer systems is part of official company records and the company can be legally compelled to show that information to law enforcement agencies or other parties.

## **Breaches of This Policy**

Knowingly breaching this policy is a serious matter. Users who do so may be subject to disciplinary action, up to and including termination of employment (employees) or removal from the workplace (subcontractors, consultants or agency staff).

Employees, subcontractors, consultants and agency staff may also be held personally liable for violating this policy.

Where appropriate, PWM UK Ltd will involve the Police or other law enforcement agencies in relation to breaches of this policy.

If you notice any use of social media by other members of staff in breach of this Policy please report it to your line manager, who in turn will report it to Senior Management.

A handwritten signature in black ink, appearing to read 'Alex Murphy'.

**Alex Murphy**  
**Managing Director**  
**10<sup>th</sup> October 2023**