

Severn Group

# Social Media Policy

JULY 2022

# Introduction

In this Severn Group Social Media Policy, we provide a guide to all employees within the Group on how to responsibly use social media, to promote the work of Severn Group and also how to use it in a personal capacity:

## **Our aim is to:**

- Empower and guide you on how to talk about your work and share your passion
- Establish clear rules on personal use of social media at work
- Remind you that if you do engage in social media, you are expected to protect our brand
- Encourage you to promote our business within the guidelines of this Policy
- Remind you that you are personally responsible for the content you publish on blogs, wikis or any other form of user-generated media. Please remember that the internet never forgets
- Warn you that what you say on social media sites, even outside of your working time, is not private and advise you that we will not tolerate comments which are offensive, or which bring the Group, its employees, or its customers into disrepute
- Outline Severn Groups' Policy on using social media for recruitment practices
- Explain the possible consequences of Policy breaches

## **What we mean by Social Media**

Our definition of Social Media is:

- Social networking sites including (but not limited to) Facebook, Snapchat, Twitter, TikTok and Instagram
- Professional networking sites such as LinkedIn
- Online chatrooms and forums
- Internet postings and blogs
- Other social media such as YouTube, Flickr, Glassdoor and WhatsApp

# The Expectation

## **Use of the Group's equipment for personal social media activities**

You may use our Group equipment, including PCs, laptops and smartphones, to access social media outside your working hours or during breaks. However, you must not access any inappropriate or offensive websites or material (detailed rules can be found in our Group ICT Policy) and you must comply with the rules on responsible content set out below.

## **Monitoring**

We log and audit the use of the Group's computers, laptops and devices, including email, internet and other computer use. Auditing software has been installed to monitor which internet sites you visit. We may monitor the content of what you have posted or uploaded where we have good reason to do so. We do this in order to investigate and detect unauthorised use of our equipment in breach of our policies, including social media use. For further details of how we monitor and the purpose of monitoring, see our Group ICT Policy and for further details of how we use your personal data, your rights in relation to that data, and whom to contact if you have any concerns, please refer to your local Employee Privacy Notice.



## **Use of your own equipment to access social media sites while you are at work**

Social media should only be accessed during the working day during non-working periods, it should not interfere with the productivity of your work.

# The Approach

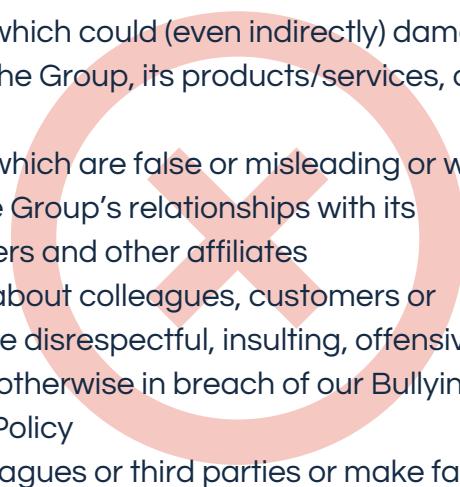
## Posting responsibly / content on social media sites

When using social media sites such as Facebook, Instagram, Twitter, YouTube, blogs, etc. you are operating in a public space. Your conduct may have severe consequences for the Group, its employees, its customers/suppliers and other affiliates.

You should comply with the following basic rules whenever you are using social media sites, whether using our equipment or your equipment and whether you are doing so during or outside of working time and whether you are using social media for business or personal purposes.

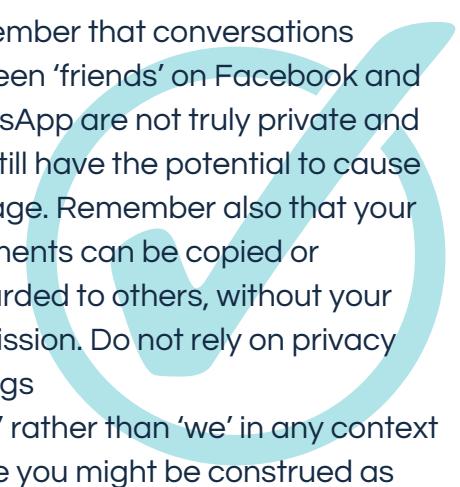
Do not:

- Make comments which could (even indirectly) damage the reputation of the Group, its products/services, or its employees
- Make comments which are false or misleading or which could damage the Group's relationships with its customers/suppliers and other affiliates
- Make comments about colleagues, customers or suppliers which are disrespectful, insulting, offensive or discriminatory, or otherwise in breach of our Bullying and Harassment Policy
- Impersonate colleagues or third parties or make false or misleading statements
- Comment on sensitive business-related topics such as potential site closures or acquisitions, or the Group's financial performance
- Post comments, pictures or videos which are inconsistent with the requirements of your role or the image or characteristics it requires you to project/possess
- Use a Group e-mail address to register on social media sites
- Divulge confidential information about our business or our customers or suppliers (including with respect to personal information of employees, customers, suppliers and others), or do anything to jeopardise our trade secrets, confidential information and intellectual property (such as trademarks, copyrights and patents). You must not include our logos or other trademarks in any social media posting or in your profile on any social media



Do:

- Remember that conversations between 'friends' on Facebook and WhatsApp are not truly private and can still have the potential to cause damage. Remember also that your comments can be copied or forwarded to others, without your permission. Do not rely on privacy settings
- Say 'I' rather than 'we' in any context where you might be construed as talking about our organisation, even if you have not named us. State that the views you are expressing are your personal ones in any situation where it could otherwise be inferred that your views are those of the Group
- Use our Speak Up & Whistleblowing policy to raise any malpractice issues – this is the appropriate channel for raising issues in the first instance, not social media sites
- Report to HR or ICT if you see anything on social media including Glassdoor and other review sites that reflects poorly on us or indicates that a colleague may have breached this Policy



# The Approach

## Recruitment

We may use social networking sites as recruitment aids but we will adhere to the following guidelines:

- We will let candidates know that we conduct searches of social media sites as part of our decision-making process (e.g. in the job applicant privacy notice given to candidates when they submit their application)
- Searches will be limited to material that is relevant to the candidate's ability to do the job. This means that searches will be conducted only on 'professional' social media such as LinkedIn (and Twitter, if a candidate tweets in their professional capacity)
- Candidates will be permitted to comment on any information which causes us to reject a candidate's application
- Under no circumstances will the information gained be used to discriminate against job applicants in contravention of our Equality Policy

## LinkedIn

If you have a LinkedIn profile and, if your profile states that you are an employee or contractor for the Severn Group, then please ensure that any comments, shared posts or likes/dislikes:

- Do not reflect any commentary on political, geopolitical or world matters
- Are impartial and adopt neutral approaches to countries, states, entities and individuals whatever your beliefs
- Are accurate and true
- Do not divulge confidential or sensitive material or material which might impact the reputation of the Group
- References to the Group and your employment are respectful and within guidelines
- You make it clear when posting content that the opinions are your own and are not those of the Group

Please ensure that any political affiliation or activity you may engage in is not linked in any way to your employment within the Severn Group.

Please also ensure that any personal opinion about geopolitical matters is not connected with your employment. The Group has business and personnel connections worldwide and we continue to conduct our business within the sanction regime. The Group checks its customers and suppliers in a rigorous due diligence process, ensuring we maintain our neutral position. Please ensure that any comments you make, items you share or posts you upload in the name of Severn do not imply or infer any personal opinions or claims of sanction regime breaches by the Severn Group.

# The Approach

## Breaches of this Policy

If you are uncertain or concerned about whether you could be breaching an element of this Policy, for example by making a particular statement or posting particular content online, speak with your manager or the marketing department for guidance before you proceed.

If you become aware of any breach of this Policy, whether by you or another person, you should report your concerns to ICT immediately. If you consider that there could be a breach of data protection law, please also see your local Employee Data Protection Policy and report the issue immediately to your Site Data Protection Lead, or the Group Data Protection Lead.

Any breach of this Policy will be taken seriously and may lead to disciplinary action. Serious breaches will be regarded as gross misconduct and may lead to immediate dismissal under our disciplinary procedure. Serious breaches would include (but are not limited to) posting material which could damage the Group's reputation, making discriminatory comments about colleagues, disclosing confidential information, or acting in breach of our Data Protection Policy. Other breaches may also be considered to be serious breaches, depending on the circumstances, including your role within the Group.

You must remove any material posted in breach of this Policy upon our request. Failure to comply with such a request may in itself result in disciplinary action.

You must co-operate to the fullest extent possible in any investigation into suspected breaches of this Policy.

If the effect or meaning of any part of this Policy is unclear, you should seek clarification from the Group ICT lead.

## Status of this Policy and new instructions

This Policy is non-contractual and the Group reserves the right to alter any of its terms in this Policy at any time.

This Policy may be supplemented by additional instructions from the ICT Department about how you use our telecommunication systems. It is very important that you comply with any such instructions.



At Severn Group, our business success flows from expertise – from technical knowledge and experience that position us as a leader in our field. Not everything, however, can be engineered. The Values which underpin that success stem instinctively from the culture we seek to sustain. Everything we do is tested against our Values, and our people are encouraged to apply them every day: they are the stewards of our brand, our reputation, our heritage, our ambitions.



**Customer**



**Integrity**



**Excellence**



**Accountability**