STANDARD PROCEDURE

Social Media Policy

The HW Martin Group of Companies (the "Group") accepts that its employees may use social media and that social media sites are a useful way of interacting socially with colleagues and friends.

For the purposes of this Policy the term "social media" refers to information or dialogue which is available and posted on a web based forum; examples include (but are not limited to); Facebook, Instagram, Myspace, Tumblr, Twitter, WhatsApp and YouTube.

The Group expects certain standards of conduct to be observed to protect both its legitimate business interests and its employees from the dangers of inappropriate use of social media and this policy applies both inside and outside the workplace irrespective of whether the posts are done during working hours or in the employee's own time.

1. Employees must not post information on social media which refers to the Group, the Group's business activities, its customers or suppliers.

2. Employees must not access social media sites during working hours. Access using the Group's IT systems are restricted, unless specific permission is granted by a Director or senior manager.

3. Employees must make it clear when posting information or comments on social media that any personal views expressed are their own and don't reflect the views of their employer.

4. Employees must not post information on social media sites which is confidential to the Group, its suppliers or customers and must not discuss colleagues, competitors, customers or suppliers without their prior consent.

5. Employees will be held accountable for any comment on social media which has any direct or indirect connection with the Group which is derogatory, defamatory, misrepresentative, discriminatory or offensive in any way, or which could bring the Group into disrepute.

6. Employees should be aware that social media may create documents which the courts can order to be disclosed for use in litigation. Consequently, employees will be assumed to have written/posted items unless they can prove definitely that they have not done so.

7. The Group (or an appointed third party) will monitor social media as is deemed necessary in order to protect its business interests and employees.

8. Employees must never disclose commercially sensitive, private or confidential information and before you publish any information you wish to share, ask yourself whether there will be a negative impact on people's perceptions of the Company. You are personally responsible for content you publish on social media and what you publish will be public for many years.

9. Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to a legal and financial liability against you regardless of whether or not you are still employed by the Group.

10. If you are unsure of any of the above, you should seek advice from the Group Human Resources Manager in the first instance. If there is any doubt in your mind, the best option is to refrain from publishing content altogether.

This policy is designed to give guidance and to protect both employees and the Group from any damages that social media may cause. A failure to adhere to the policy may result in action in accordance with the Company's disciplinary procedure. The Company reserves its right to pursue individuals for any losses it may incur as a result of inappropriate behavior to protect its reputation.

REMEMBER: Social media is not the appropriate place to raise a workplace concern, which should be addressed internally and a failure to do so will be regarded as a serious breach of this policy.

If you notice content posted on social media about the Group (whether complementary or critical) please report it to the Group Human Resources Manager or a Director.

Harold W Martin
Chairman