



## Social Media Policy

### 1. PURPOSE and GUIDING PRINCIPALS

UBUNTU Group and its Subsidiaries recognize that technology provides unique opportunities to build our business, listen, learn and engage with consumers, stakeholders and employees through the use of a wide variety of Social Media. However, how we use social media and what we say also has the potential to affect UBUNTU Group and its Subsidiaries' reputation and/or expose the Company (and each of us) to business or legal risk.

Whilst we recognize the benefits which may be gained from appropriate use of social media, it is also important to be aware that it poses significant risks to our business. These risks include disclosure of confidential information and intellectual property, damage to our reputation and the risk of legal claims, a variety of unlawful acts which may include but not limited to bullying, harassment, defamation, discrimination (discrimination includes discrimination on the basis of race, gender, sexual orientation, pregnancy, marital status, family responsibility, ethnic or social origin, colour, age, disability, religion, HIV status, conscience, belief, political opinion, culture, language and birth).

Therefore, every employee has a personal responsibility to be familiar with and comply with UBUNTU Group and its Subsidiaries' overall Social Media Policy. This policy is designed to reflect our purpose, values and principles, our business conduct manual, and legal requirements. Because we use social media in a variety of ways, there are more specific expectations that may apply to your activities.

This Social Media Policy does not seek to stifle lawful expressions of personal views, nor does it seek to discourage appropriate use of the Social Media in Employees' work or personal lives.

### 2. SCOPE and APPLICATION

This policy covers all forms of social media, including Facebook, Instagram, LinkedIn, Twitter, Google+ Wikipedia, other social networking sites, and other internet postings, including blogs. It applies to the use of social media for both business and personal purposes, during working hours and in your own time to the extent that it may affect the business of UBUNTU Group and its Subsidiaries listed below.

- i. Black Moon Investments (Pty) Ltd (BMI)
- ii. Assurity Insurance Brokers (Pty) Ltd
- iii. Virtusell
- iv. UBUNTU Concrete Works (Pty) Ltd

The policy applies both when the social media is accessed using our information systems and also when accessed using equipment or software belonging to employees or others.

It also covers all employees and others including consultants, contractors, and casual and agency staff. Breach of this policy may result in disciplinary action up to and including dismissal. Any misuse of social media should be reported to Human Resources.

Questions regarding the content or application of this policy should be directed to Group Human Resources.

### **3. POLICY STATEMENT**

Although many users may consider their personal comments posted on social media or discussions on social networking sites to be private, these communications are frequently available to a larger audience than the author may realize.

As a result, any online communication that directly or indirectly refers to UBUNTU Group and any of its Subsidiaries, our products and services, team members or other work-related issues, has the potential to damage The Group and its Subsidiaries' reputation or interests.

When participating in social media in a personal capacity, employees must:

- Not disclose UBUNTU Group and any of its Subsidiaries' confidential information, proprietary or sensitive information. Information is considered confidential when it is not readily available to the public. The majority of information used throughout UBUNTU Group and its Subsidiaries is confidential. If you are in doubt about whether information is confidential, refer to your manager before disclosing any information.
- Not use UBUNTU Group or its Subsidiaries logo or company branding on any social media platform without prior approval from Executive Management.
- Not communicate anything that might damage UBUNTU Group and its Subsidiaries' reputation, brand image, commercial interests, or the confidence of our clients;
- Not represent or communicate on behalf of UBUNTU Group and/or any of its Subsidiaries in the public domain without prior approval from Executive Management.
- Not post any material that would directly or indirectly defame, harass, discriminate against or bully any UBUNTU Group and/or any of its Subsidiaries' team member, supplier or customer;
- Ensure, when identifying themselves (or when they may be identified) as a UBUNTU Group and/or any of its Subsidiaries' team member, that their social media communications are lawful and Comply with UBUNTU Group and its Subsidiaries' policies and procedures.

### **4. RESPONSIBLE USE OF SOCIA MEDIA**

- a) Employee must not use social media in a way that might breach any of our policies, any express or implied contractual obligations, legislation, or regulatory requirements. In particular, use of social media must comply with:

- The Anti-Bullying and Sexual Harassment Policies
- Rules of relevant regulatory bodies;
- Contractual confidentiality requirements;
- Other key policies/requirements.

When they use social media, employee must:

- Disclose their affiliation: If you discuss work related matters that are within your area of expertise or provide information related to our products you must clearly and conspicuously disclose your affiliation with the Company;
- State that it's THEIR opinion: Unless authorized to speak or conduct research on behalf of the Company, when commenting on the business include a disclaimer that the opinions provided do not represent the views of the Company. To help reduce the potential for confusion, you must include the following notice in a reasonably prominent place on your site, or if posting on the site of another, you must include it within your post: *"The views expressed on this website/weblog are mine alone and do not necessarily reflect the views of my employer."*
- Act responsibly and ethically: When participating in online communities related to our business, do not misrepresent yourself. It is never acceptable to use aliases or otherwise deceive people.
- Be professional and exercise good judgment: When you identify yourself as an employee of the Group and its Subsidiaries within a social network, you are connected to other employees, clients, and potential clients. Communicate online with respect for others. Remember that information shared via social media is generally public information that could easily be viewed by our employees, clients and suppliers. Exercise caution with regard to exaggeration, colorful language, guesswork, obscenity, copyrighted materials, legal conclusions, and derogatory remarks or characterizations in any way related to the Company, its products, services, clients, suppliers and employees.

When they use social media, employees must not:

- Make disparaging or defamatory statements about us, our employees, clients, customers, or suppliers;
- Harass, bully or unlawfully discriminate in any way;
- Use data obtained in the course of your employment with us in any way which breaches the provisions of the Data Protection Act 1998 and the Protection of Personal Information Act 4 of 2013;

- Breach copyright belonging to us;
  - Disclose any intellectual property, confidential or commercially sensitive information relating to our business;
  - Make statements which cause, or may cause, harm to our reputation or otherwise be prejudicial to our interests.
- b) Employee should avoid using social media communications that might be misconstrued in a way that could damage our business reputation.
- c) Employee should make it clear in personal postings that he or she are speaking on their own behalf, in particular write in the first person and use a personal e-mail address. If you disclose that you are an employee of us, you must state that your views do not represent those of your employer. For example, you could state, "the views in this posting do not represent the views of my employer".
- d) Where UBUNTU Group and any of its subsidiaries' systems are used to access any Social Media site/platform the terms of this policy will take precedence over any other policy.
- e) Notwithstanding 4. d) above, the use of Social Media Platforms may be limited or blocked at the discretion of management.
- f) Employees/Contractor may not use for their personal Social Media Accounts the UBUNTU Group and any of its subsidiaries email accounts assigned to them for business use.

Remember that you are personally responsible for what you communicate in social media. Often materials published will be widely accessible by the public and will remain accessible for a long time. If you are uncertain or concerned about the appropriateness of any statement or posting, you should discuss it with your manager before making the post.

## 5. BREACHES

Examples of potential breaches of this policy include but are not limited to:

- Posting information to an online discussion forum about upcoming UBUNTU Group and its Subsidiaries' promotions or future markdowns;
- Posting a comment on the UBUNTU Group and its Subsidiaries' Facebook/Instagram page in response to a customer comment or complaint about our services;
- Uploading video footage to YouTube or any other Social Video Platform showing anything that could damage UBUNTU Group and its Subsidiaries' reputation;
- Making derogatory comments about UBUNTU Group and its Subsidiaries', employees, clients or suppliers;

- Posting obscene images or offensive comments to Facebook/Instagram about a work colleague where this could constitute bullying, discrimination or harassment.
- Employees, Contractors and Service Providers to the group and its subsidiaries are cautioned that the use of hate speech and/or derogatory, discriminatory or defamatory language (or similar communications) may render them unsuitable for continued employment and/or business relationship, even if such language or communication does/do not relate to UBUNTU Group or any of its subsidiaries, Employees and/or Clients.
- Employees must timeously remove any posting on a Social Media Platform which breaches these guidelines when required to do so by management. Failing which may result in itself in disciplinary action.

## 6. DISCIPLINARY ACTION

Employees are responsible for adhering to the aforementioned social media guidelines. Failure to comply with the guidelines in this policy or on-line activity that otherwise cause harm to UBUNTU Group and its Subsidiaries' may be subject to disciplinary action up to and including termination of employment, as permitted by law.

Document Control:

The Company reserves the right to make changes to this policy document as and when required, and will endeavor to provide reasonable notice where changes are applied.			
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