

## Social Media Policy

### 1 INTRODUCTION

1.1 This policy (the “Policy”) sets out the approach of V.Group to social media and seeks to minimise the risks to our business through its use.

1.2 This Policy:

(a) forms part of V.Group’s Compliance & Ethics Policies which are available at <https://vgrouplimited.com/legal/compliance/>;

(b) applies to all Colleagues;

(c) has been approved by Group Marketing; and

(d) may be amended by V.Group at any time, consistent with the requirements of applicable laws and regulations. Any revisions will take effect from the date on which the amended Policy is published, as indicated by the version number.

1.3 Any breach of this Policy will be taken seriously and may result in disciplinary action.

1.4 Any questions or concerns about the operation of this Policy, including whether this Policy has been followed, should be referred to Group Marketing by contacting [marketingupdate@vgrouplimited.com](mailto:marketingupdate@vgrouplimited.com)

### 2 DEFINITIONS

2.1 “Colleague” means any employee of V.Group; “Group Marketing” means the marketing function of V.Group (which may be contacted via [marketingupdate@vgrouplimited.com](mailto:marketingupdate@vgrouplimited.com)); and “V.Group” means Vouvray Acquisition Ltd and its subsidiaries and/or affiliates.

2.2 Words denoting the singular shall include the plural and vice versa.

### 3 WHAT IS SOCIAL MEDIA?

3.1 Social media is interactive online media, which can be internal or external, allowing parties to communicate with each other and/or to share content in a public or shared forum.

3.2 V.Group recognises and embraces the benefits and opportunities that social media can bring as a tool. This includes external online professional platforms (such as LinkedIn), social forums (Twitter, Facebook, etc.), anonymous apps, blogs, video-and image-sharing websites and similar facilities. It also includes internal collaboration tools, such as Yammer and Microsoft Teams. It can be used to share news, information and successes, and keep Colleagues up to date with important developments relating to V.Group.

### 4 CONSEQUENCES OF INAPPROPRIATE USE

4.1 There is an inherent risk involved in using social media as it is an instantaneous and far reaching form of communication. Any inappropriate use of social media can result in significant and long-term harm to V.Group’s reputation. V.Group encourages Colleagues to engage, collaborate and innovate through social media; but however and whenever a

Colleague chooses to do so, they must be aware of the potential impact on both themselves and V.Group.

## 5 APPLICATION

### 5.1 This Policy:

- (a) is intended to minimise the risks of social media which can impact on the wellbeing of Colleagues and the reputation of V.Group, so that all Colleagues can enjoy the benefits of social networking while understanding the standards of conduct expected by V.Group;
- (b) applies to all use and all internal and external forms of social media where there is potential impact on Colleagues or V.Group, for either work-related or personal use, or during working hours or otherwise, whether social media is accessed using V.Group's information systems ("IS") facilities and equipment, or equipment belonging to Colleagues.

## 6 APPROACH

### 6.1 You must:

- (a) ask yourself whether any comment, photograph or video you are about to post on social media is something that you would want Colleagues, your manager or people outside of V.Group to read;
- (b) only comment within your own area of expertise to provide individual perspectives on non-confidential activities within V.Group;
- (c) only make a statement or comment on behalf of V.Group or any of its associated businesses if authorised to do so;
- (d) remember that on social media, Colleagues speak for themselves, but such words/actions could reflect on V.Group;
- (e) use common sense and common courtesy. You should ask permission to publish or report conversations that are meant to be private or internal to V.Group. V.Group's privacy, confidentiality and legal guidelines for external communication should not be breached by a Colleague's efforts to be transparent;
- (f) ensure that you respect the privacy and intellectual property of V.Group, Colleagues, customers and suppliers if creating content;
- (g) seek guidance before participating in social media when the topic being discussed may be considered sensitive (e.g. a crisis situation, intellectual property, issues which may impact on V.Group's reputation, commercially sensitive material). Social media activity around sensitive topics should be referred to Group Marketing;
- (h) be aware of security threats and be on guard for social engineering and phishing attempts (social networks can be used to distribute spam and malware);
- (i) be transparent and state that you work for V.Group if you are posting about V.Group. If you are writing about V.Group or a competitor, use your real name, identify that you work for V.Group, and be clear about your role. V.Group discourages Colleagues from posting online anonymously or using pseudonyms. You should never impersonate another individual; and
- (j) if you see social media content that disparages or reflects poorly on V.Group, you should contact Group Marketing.

### 6.2 You must not:

- (a) represent yourself or V.Group in a false or misleading way. All statements must be true and not misleading; all claims must be substantiated;
- (b) disclose or discuss proprietary, confidential or commercially sensitive information or data belonging to V.Group or its customers;
- (c) use customers' names, logos and trademarks or any reference to dealings with customers without specific customer permission; or
- (d) post anything about V.Group without having the correct permissions.

6.3 Line managers are responsible for addressing any concerns and/or questions arising out of the use of social media.

## 7 PROCEDURES

7.1 Where Colleagues access social media for work-related purposes or personal use using V.Group's IS facilities and equipment, V.Group's IS policies will apply.

7.2 Where appropriate, V.Group reserves the right to monitor use of social media platforms and take appropriate action to protect against any misuse that may be harmful to the business, in accordance with the IS regulations and where the law permits.

7.3 If a Colleague's use of social media is considered to be derogatory, discriminatory, bullying, threatening, defamatory, offensive, intimidating, harassing, exposing V.Group to legal liability or disrepute, breaching any other V.Group policy or procedure, then V.Group may take disciplinary action up to and including dismissal. This may include comments, videos or photographs, which have been posted on social media sites about V.Group or Colleagues. Any Colleague suspected of committing a breach of this Policy will be required to cooperate with any consequent investigation, which may involve handing over relevant passwords and login details.

7.4 V.Group's response to any misuse of social media in a personal capacity will be reasonable and proportionate to the perceived offence, the nature of the postings/comments made and the impact or potential impact on V.Group.

7.5 Social networking sites may be referred to when investigating possible misconduct.

7.6 V.Group may require Colleagues to remove social media postings which are deemed to constitute a breach of these standards and failure to comply with such a request may, in itself, result in disciplinary action.

7.7 V.Group may reach out to a Colleague's family in the event of an incident to brief them how to react if contact is made by the media, and to request that all call be directed to MTI. Where necessary, the family will be advised that the use of social media can adversely affect situations and should be avoided at all costs.

## 8 RECRUITMENT AND SOCIAL MEDIA

8.1 Colleagues using social media for recruitment must:

- (a) refer potential candidates to [www.vcrew.com](http://www.vcrew.com) to apply for any job opportunities; and
- (b) post adverts via [www.vcrew.com](http://www.vcrew.com) only, not directly from a recruiter profile.

8.2 Colleagues holding a LinkedIn recruiter licence to source and attract potential candidates for jobs at V.Group must:

- (a) use a V.Group email address to log in, not a personal email address, as this is a paid for product by V.Group and is to be used for V.Group's business requirements only;
- (b) not source, attract or build personal networks for potential candidates through a personal LinkedIn account without adding these candidate leads to V.Group approved databases;
- (c) ensure that all company information published in LinkedIn 'InMails' is taken from approved press and legal content or has received separate approval from Group Marketing;
- (d) ensure that their LinkedIn profile is professional and conforms to the guidelines provided to all LinkedIn recruiter licence holders.

## 9 TIPS FOR BETTER ONLINE SECURITY

9.1 Be Responsible: Social media exists between the public and private spheres. Your views and actions online can impact the company's reputation.

9.2 Be Accurate: Never publish inaccurate information regarding the company online.

9.3 Be Yourself: Social media is a forum for you to represent your own views and ideas. Always make clear that any statements are your own and do not represent the views or values of the company.

9.4 Be Respectful: Do not violate the privacy of your colleagues, customers and competitors. etc.

9.5 Be Accountable: Post online only what you would be comfortable saying to people in person or in public.

9.6 Be Considerate: Never use social media as a platform to harm, intimidate, insult, threaten, defame or embarrass others.

9.7 Be Aware: If you find defamatory commentary about the company on social media forums, inform Group Marketing who can respond appropriately.

## 10 MANAGING WELLBEING

10.1 Limit the amount of time you spend on social media, regardless of what device you use. Various studies show that too much exposure to social media can be detrimental to mental health and wellbeing.

10.2 Be Kind: If you wouldn't say something to someone's face, should you say it on social media? Think about the consequences for yourself and others when you post.

10.3 Keep things in perspective. Don't overreact to content you see online. If you see something which is inappropriate, report it using the correct channels.

10.4 Be culturally aware: V.Group has a diverse workforce covering many different locations, religions and cultures. Remember that the content you post may have different connotations in other locations.

## 11 INTERNAL REPORTING

11.1 You must immediately contact Group Marketing if there is any actual or suspected breach of this Policy.

## 12 DOCUMENT CONTROL

12.1 Group Marketing is the owner of this Policy and is responsible for ensuring that it is reviewed in line with the relevant review requirements.

12.2 A current version of this Policy is available at <https://vgrouplimited.com/legal/compliance/>

12.3 This Policy was approved as stated in this Paragraph and is issued on a version controlled basis.

Version	2
Date of Issue	05/07/2021
Approved by	Rhona Little
Position	Marketing Manager