

Social Media Policy

The growth in social media, particularly social networking sites, has created increased opportunity for media communications that have an impact upon SGE Ltd.

No doubt social media has many positive attributes, but we feel it necessary to set out in this policy our expectation for compliance in terms of using social media.

The risks that social media place upon the Company could be construed as any of the following upon its employees, clients, contractors and our own products and services:

- Discriminatory
- Defamatory
- Bullying and harassing
- Breaching confidentiality, including intellectual rights, or
- Slanderous

The intended or unknowing effects of participating in social media activities can adversely affect the Company, its employees, its clients, contractors and products and services.

The obligations of this policy include anyone who is employed or contracted to provide services or goods to the Company. We take any breaches of this policy seriously as we will not tolerate any discrimination, defamation, slander or breaches of confidentiality. Additionally, we will not accept the disclosure of company business on social networking sites whatsoever.

Clarification

The term 'social media' is used here to describe dynamic and socially interactive, networked information and communication technologies, for example

- Web 2.0 sites,
- SMS text messaging
- Social networking and virtual gaming.

Specific examples of blogging and micro blogging include:

- Twitter
- Facebook
- You Tube
- Wikipedia

While the Company has clear guidelines and policies regarding other aspects of its operation, e.g. employment, health and safety, IT and corporate identity, these do not explicitly cover the usage of social media. The following details the policy of the Company in terms of controlling the use of social media.

Unauthorised actions

It is the policy of SGE Ltd not to permit any of its employees to participate in web based social media through any of its IT systems for any personal use during contracted working hours, including overtime working. This includes but is not limited to the access of social media through company computers, mobile and landline telephones and smart phones.

Without the authority of a director no social networking or publishing on behalf of the Company will be permitted. Employee's that falsify their status or establish social networking sites without the approval of the Company will be subject to disciplinary action, and possibly summary dismissal.

Employees must remember that the relationships the Company has with its clients must remain professional at all times. Therefore any 'connections' made on social networking sites may expose our clients to content that may be seen as defamatory, discriminatory, or breaching confidentiality to the Company and hence could be subject to disciplinary action. Although firewall and antivirus software is in place it is considered that any downloading to and from social media sites, such as networked games, places the company IT systems at considerable risk and therefore must not be attempted, unless authorisation has been permitted by the Company.

Although it is difficult for the Company to monitor any reported misuses that bring the Company into disrepute all disclosures made will be investigated with the upmost confidence and dealt with through the company disciplinary and grievance procedures.

The Company cannot restrict or control use of social media in employee's non-working personal time and what they undertake through their own medium. We acknowledge the right of individuals to have the freedom to communicate and socialise through online media all employees must be aware that wherever the disclosure or implication of any Company matters occurs, including other employees and its clients, then disciplinary action may be considered. Employees must not disclose any of the following:

- Records relating to the Company, such as
 - Financial results,
 - Client records,
 - Discoveries,
 - Designs and patents,
 - Business plans and corporate records relating to the shareholder.
- Information relating to other employees age, disability, sex, gender reassignment, pregnancy, maternity, race (including colour, nationality and ethnicity), sexual orientation, religion or belief or status.

Appropriate use and actions

On occasions social networking is seen as an approved and valued business activity that promotes communications with its customers and suppliers as well as a way in which to communicate with its workforce. Where authorisation is given by a director you must comply with the following rules:

- Continually consider the implications of the information posted.
- Ensure confidential information is maintained as confidential – remove names and addresses, give anonymity where possible, remove financial information.
- Refrain from making defamatory or slanderous comments or references about employees, members of the public and the Company's competitor's product or service.
- Refrain from posting comments or jokes that may offend others – give due consideration to comments that may be construed as discriminatory.
- Maintain security to the approved Company social media sites at all times. Do not disclose passwords or access controls to others who may place the company in disrepute. Ensure you fully 'log off' when updates have been made.

As an example of what is deemed acceptable and approved blogging or tweeting the following could be considered:

- Publicising awards and large contracts that have been officially awarded.
- Relevant developments that affect the industry in which the Company operates and how it views these developments.
- Recruitment, giving consider of discrimination.
- Changes of contact details, i.e. office relocations

Monitoring

In line with the Company IT Policy the entire Company IT system will be monitored on a random and continual basis.

Whistleblowing

Employees are encouraged to report any considered discriminatory statements or comments posted on the personal social network sites of any employees.

Any disclosures will be treated with upmost confidence and any evidence will be presented anonymously. Any whistleblowing should be undertaken through the Company grievance procedure. Any matters of concerns raised through disclosure may be subject to disciplinary action.

Disciplinary Action

Any misuse of the system or breach of this policy will be subject to disciplinary action and could lead to summary dismissal. All cases of disciplinary action will be dealt with through the Disciplinary Policy.

Hard copies of social networking messages, blogs and tweets will be used as evidence. At any time the company can block or remove access to e-mail or internet use on all forms of medium, including smart phones. The Company routinely monitors use of the internet and smart phone facilities for any breaches of its policy.

Examples of gross misconduct where, summary dismissal may be exercised could include:

- Discrimination and harassment of its employees, clients and anyone associated to the Company in naming or implying to a person in a victimising or discriminatory manner in relation to their age, disability, sex, gender reassignment, pregnancy, maternity, race (including colour, nationality, and ethnicity), sexual orientation, religion or belief, or because someone is married or in a civil partnership.
- Defamation of the company and its products and services, these are comments and thoughts of individuals that could have a negative effect on the Company's performance.
- Bringing the name and reputation of the Company into disrepute. As a representative of the Company employees can bring disrepute on its employer. This may include posting comments that reference acts that are unlawful or against the moral and social acceptance of the employer.
- Disclosure of confidential company information.

Employees must always remember that any comments that they make with direct or implied reference the Company, its employees, clients and products and services could be construed as defamatory, harassing and discriminatory and could result in summary dismissal.

Grievances

Any employee, who has a complaint about the use of social media, including whistleblowing, should raise the matter informally through a director or formally through the Company's Grievance Procedure



Signed for on behalf of Specialist Ground Engineering Ltd.

Position. *MD*

Date. 27/12/2025.