BANKS Group
development with care

BUSINESS SYSTEMS

SOCIAL MEDIA CODE OF CONDUCT

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Background

The use of on-line forums (social media*) for communicating has grown significantly in recent years and The Banks Group (the company) recognises that how we behave in these forums in a professional or a personal capacity can impact upon our employees and the company's reputation and business. As a general principle the standards for communicating when using social media should be the same as those used in other methods of communication, i.e. use judgement and respect and communicate with others in the way that you would expect others to communicate with you in everyday life.

The Banks Group has an official website, Linked In page, YouTube channel, Facebook page and Twitter account.

Purpose

The purpose of this code of conduct is to:

- Provide guidelines for managers, employees, agency workers and contractors (service providers) in upholding the principles outlined above when using social media in a professional or a personal capacity.
- Help employees and service providers to draw a line between the private and professional use of social media.
- Provide clear guidelines for employees and service providers that whilst they are permitted to share, retweet or like official Banks Group social media posts on their own personal platforms provided that they do not add any other comment they should not make any unauthorised posts regarding the company, our stakeholders including but not limited to, employees, contractors, business and charitable partners, and our business activities.
- Assist the company to protect itself against liability for the actions of its employees and service providers.
- Help line managers to manage performance more effectively.
- Highlight other company policies which are relevant to social media use.
- Ensure that the company complies with relevant discrimination and data protection legislation.
- To outline support that the company will provide in the event of inappropriate treatment on social media as a result of the employee or service provider's role with the company.

Scope

This code of conduct covers all permanent and temporary employees of the company and service providers for the duration of any employment or service provision to the company.

Breach of this or other related policies may lead to disciplinary action and in serious cases, may be treated as gross misconduct leading to summary dismissal.

This social media code of conduct is not incorporated into terms and conditions of employment and it may be amended, updated or withdrawn at any time by the company.

Responsibility for implementing this code of conduct

It is the responsibility of the environment & community director to make recommendations regarding updating this code of conduct to ensure that the reputation and brand of the company is protected and to authorise all postings, images, videos or audio recordings relating to the company or its stakeholders for use on The Banks Group web site or social media.

It is the responsibility of The Banks Group's human resources department (HR) to provide advice to line managers on the application of this code of conduct and to amend and update it when appropriate.

It is the responsibility of line managers to seek advice from HR in the event that potential non-compliance with this code of conduct is discovered.

It is the responsibility of all employees and service providers to read and to comply with this and other related policies such as personal conduct and e-mail/internet policies.

It is the responsibility of the IT department to monitor internet traffic and to provide the relevant line managers and HR with information in the event that potential misuse is discovered.

Rules for the use of social media

Employees and service providers are reminded that any content that is published on social media is in the public domain. Even if a social media post is deleted, it can still be "print screened" and saved to provide evidence which could be damaging to the group's reputation. Individuals should therefore give careful consideration to any personal information about themselves, their family and where they work that is published on line and ensure that appropriate privacy settings are in place on their own private social media accounts.

Employees and service providers are **not** permitted to:

- Take photographs or record audio or videos of any company sites, activities or personnel using personal devices unless authorised to do so by a Banks Group director**.
- Upload videos, photographs or post any comments or any other content relating to any company sites, activities or personnel without prior permission from the environment & community director.
- Upload, post or forward any content or links which could be seen as abusive, obscene, discriminatory, threatening, harassing, derogatory, defamatory, in poor taste or not in the best interests of the company.
- Use social media to disclose commercially sensitive, anti-competitive, private or confidential information.

Social media for work purposes

Only employees and service providers who are given permission from the environment & community director may access social media forums for work purposes. Those employees and service providers who are given permission to access social media sites for work purposes should observe only i.e. not actively participate in conversations or debates or make any postings on these forums.

Where supporters of our projects are identified through social media or to correct any false information that a third party may have posted about one of our projects, the appointed company representative may contact these individuals or groups via private messaging. This should only be done with the prior approval of the environment and community director and normal company e-mail standards and protocols should apply.

Only designated employees and service providers may record videos or take photographs of company sites, activities or personnel and may only do this for business purposes authorised by the environment & community director (or his authorised delegate).

The uploading of company material onto social media is strictly controlled by the environment & community director (or his authorised delegate). No employee or service provider may upload any material whatsoever without express permission from the environment & community director (or his authorised delegate).

Professional networking sites***

Where employees or service providers use professional networking sites, job title and organisation can be stated, however it should be made clear that any views or opinions expressed are the individual's and not those of the company.

Personal use of social media

The company understands that employees and service providers may use social media for personal purposes. Where personal use takes place personal profiles, posts, comments, dialogue or any other content should not make any reference to the company or to issues of direct relevance to the company (for example mining, wind farms or property development) or to any of its projects or stakeholders. Authorised posts from the official Banks Group social media platforms or web site may be shared, retweeted or liked on social media provided it is shared without the addition of any further comment. You should not respond to any negative responses or feedback to any official Banks Group social media post that you may have shared. If you do receive any negative feedback to Banks Group official media posts you should not respond but should seek advice from the environment and community director regarding what action is appropriate.

Employees and service providers should not join social media groups which could present a reputational risk to the company or its stakeholders or join any group or forum set up to oppose a Banks Group project or our business areas (even for the purpose of intelligence or information gathering) or make any posts or upload any information, images or videos which are not in the interests of the company or which could draw adverse publicity to the company.

When using social media for personal purposes, employees and service providers should not include their job title or any references to the company and should make it clear that any views expressed are their own.

The use of social media for personal purposes should be limited to lunchtimes and before or after normal working hours (this includes accessing social media on employees and service providers own personal devices).

Company commitment

The company recognises that social media forums can be used for strong debates and dialogue and that cyber bullying or harassment may take place. Where an employee believes

that they have been treated inappropriately on a social media platform as a result of their job or because of a service that they have provided to the company, please in the first instance raise this with your line manager or with HR who will advise you about appropriate ways to address your concerns. Employees should **not** retaliate or respond personally to perceived attacks where it is in relation to their job or to any of the company's activities or projects. Support may be provided through invoking our bullying and harassment policy/procedure.

Or, depending upon the seriousness of the attack the company may seek redress on your behalf through raising a formal complaint to the police or via the relevant social media platform's complaints procedures.

Further help

Should you have any queries about social media use or the application of this code of conduct, please speak with your line manager in the first instance or with the environment & community director.

Definitions

*Social media includes but is not limited to: Facebook, Facebook Messenger, Twitter, Linked-In, You Tube, Wiki's, Google Messenger, , WhatsApp, Instagram, Snap Chat. **NB Not limited to this list. The list above is not a definitive list.** The code of conduct will equally apply to other future similar online platforms or forums not yet invented.

**Personal devices include but are not limited to: smart phones, iPads, iPods, tablets, mobile phones, netbooks, cameras and video cameras.

***Professional networking sites include but are not limited to: Linkedin, Professional institution forums e.g. RICS, IcE, IMechE, RTPI, CIPR.

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