

## **SOCIAL MEDIA POLICY**

### **1. ABOUT THIS POLICY**

- 1.1 This policy is in place to minimise the risks to our business through use of social media.
- 1.2 This policy deals with the use of all forms of social media both internal and external, including Teams, Yammer, TikTok, Facebook, LinkedIn, WhatsApp, Twitter, Google+, Instagram, Vine, Tumblr and all other social networking sites, internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may affect our business in any way.
- 1.3 This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### **2. PERSONNEL RESPONSIBLE FOR IMPLEMENTING THE POLICY**

- 2.1 Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks lies with the People Operations Team who will review this policy from time to time to ensure that it meets legal requirements and reflects best practice.
- 2.2 Managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.
- 2.3 All staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to your line manager.

### **3. COMPLIANCE WITH RELATED POLICIES AND AGREEMENTS**

- 3.1 Social media should never be used in a way that breaches any of our other policies. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum. For example, you are prohibited from using social media to:

- (a) breach our obligations with respect to the rules of relevant regulatory bodies;
- (b) breach any obligations contained in those policies relating to confidentiality;
- (c) breach our Disciplinary Policy or procedures;
- (d) harass or bully other staff in any way;
- (e) breach our Equal Opportunities Policy;
- (f) breach Data Protection under local Law and Regulations (for example, never disclose personal information about a colleague online); or
- (g) breach any other laws or regulatory requirements.

3.2 Employees should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the organisation and create legal liability for both the author of the reference and the organisation.

3.3 Employees should not use company property to use any social media platforms unless authorisation has been given by your direct manager.

3.4 Employees who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

#### **4. USE OF PERSONAL ELECTRONICAL DEVICES (PED)/SOCIAL MEDIA**

Occasional use of personal electronical devices (PED) or social media during working hours is permitted so long as it does not involve unprofessional or inappropriate content, does not interfere with your employment responsibilities or productivity and complies with this policy.

For active crew, the following also apply:

Crew members need to adhere to the CSPM chapter 2 and the OM-A chapter 8 at all times.

Additionally, crew members are allowed to take a quick photo or record a small video of less than a minute during the following phases only:

- Pre-boarding
- Cruise while on break
- After landing

Ensure that:

- Passengers are not present
- All safety and non-safety tasks have been completed.

## **5. PROHIBITED USE**

- 5.1 You must avoid making any social media communications that could damage our business interests or reputation, even indirectly.
- 5.2 You must not use social media to defame or disparage the Company, our staff or any third party; to harass, bully or unlawfully discriminate against staff or third parties; to make false or misleading statements; or to impersonate colleagues or third parties.
- 5.3 You must not comment on internal or external platforms in an opportunity to influence or encourage negative posts. The Company will not tolerate any social media activity that is not in line with the Company's social media Policy and values.
- 5.4 You must not express opinions on the Company's behalf via social media, unless expressly authorised to do so by your manager. You may be required to undergo training in order to obtain such authorisation.
- 5.5 You must not post comments about sensitive business-related topics, such as the Company's performance, or do anything to jeopardise our trade secrets, confidential information and intellectual property. You must not include our logos or other trademarks in any social media posting or in your profile on any social media 'unless reposting an official Norse Atlantic social media post from a recognised company channel
- 5.6 Any misuse of social media should be reported to your line manager.

## **6. GUIDELINES FOR RESPONSIBLE USE OF SOCIAL MEDIA**

- 6.1 You should make it clear in social media postings, or in your personal profile, that you are speaking on your own behalf. Write in the first person and use a personal email address.
- 6.2 Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see.
- 6.3 If you disclose your affiliation with the Company on your profile or in any social media postings, you must state that your views do not represent those of your employer (unless you are authorised to speak on our behalf as set out in paragraph

5.3). You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.

6.4 If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your manager.

6.5 If you see social media content that disparages or reflects poorly on us, you should contact your manager or the People operations team.

## **7. MONITORING**

7.1 We reserve the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes and you consent to such monitoring by your use of such resources and systems.

## **8. BREACH OF THIS POLICY**

8.1 Breach of this policy may result in disciplinary action up to and including dismissal. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation.

8.2 You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.