

SPRING SOCIAL MEDIA POLICY

31st January 2020

OBJECTIVE

To provide guidelines designed to prevent the potentially negative impact of information communicated via social media platforms.

DEFINITION

1. Social media may be defined as forms of electronic communication (such as websites for social networking and microblogging) through which users create online communities to share information, ideas, personal messages, and other content (such as photographs and videos). Examples are: Facebook, Twitter, YouTube, Instagram, Snapchat, WhatsApp, LinkedIn and Medium.
2. Recorded Material is defined here as a record made by a person during a training event in any medium including but not limited to photographs, videos and sound recordings.

THE PURPOSE

The intention is to ensure all members of Spring are aware of the risks associated with social media and know how to act in order to safeguard the Company's intellectual property, its reputation and that of our Associates and our Clients.

THE CONTEXT

One policy area our clients specify, as in the case of LBG/KGL is that we have a policy for social media.

It is important to note that the Spring CCR Ltd business does not use social media within its business structure. It follows therefore that no person is able to interact with the Company online.

However, we acknowledge that people access social media within their personal lives and in the case of our Associates, within their own businesses. Please be aware that the Company wholeheartedly endorses the use of LinkedIn to develop business related networks and emphasises that this policy's Guidelines should be followed with care.

THE REASONS FOR GUIDELINES

Social media presents complicated considerations for things like privacy law, security, confidentiality and legal issues. Thus, despite the Company not engaging with social media on its own account, all members of the Spring Team must take extreme care to adhere to the following guidelines when accessing social media.

GUIDELINES

1. You must not share proprietary or confidential Company information when you engage in social media activity.
2. You must be vigilant for and report to a Director any defamatory, derogatory or inflammatory content you may come across in any



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medium including social media that appears to be connected with the Company, its Associates and its Clients.

3. You must make it clear for the Reasons given above that, whilst we don't encourage it, participants are permitted to record training items of interest, e.g. by taking photographs, it must be **for their personal use only** as aide memoires etc. and they **must not post** such recordings on social media. See Workshop Opening Statement.
4. In the event you are aware that a client project is to benefit from the posting of Recorded Material to a WhatsApp Group, you must take all reasonable steps to ascertain the scope of the Group is acceptable in terms of this Policy.

TRAINING, AWARENESS AND MONITORING

At least annually or at induction the Company must:

1. Clearly explain to personnel acting on behalf of the Company their personal responsibilities in relation to their own activity on social media.
2. Ensure and review understanding of actions to take to safeguard Company proprietary and confidential information when training delegates.

End. Spring Social Media Policy 151219

