



LATITUDE FINANCIAL SERVICES AUSTRALIA AND NEW ZEALAND  
("LATITUDE")

## Social Media Policy

**Issued by:** Communications

**Approved by:** Head of Communications & Public Affairs

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**Document Contact:** Head of Communications & Public Affairs



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# 1 Scope

## 1.1 Applicability

The Social Media Policy ('this Policy') applies to all employees of Latitude Financial Services ('Latitude' or the 'Company'), including contractors and third party employees.

## 1.2 Effective Date

This Policy is effective on 26/11/2015 ("Effective Date").

# 2 Overview and Purpose

This Policy is intended to provide a Group-wide consistent framework and methodology for the governance of social media and the activities they derive (i.e. direct communication to customers, marketing).

This Policy describes the minimum standards for the Company to manage social media including to identify, assess and monitor risk, support decision-making, and to be compliant with the Operational Risk Management Framework.

The Company understands the value in using social media to build more meaningful relationships with customers, communities and other relevant stakeholders. If you are officially accredited to represent the Company in social media, or if you are discussing the Company or any business related matters in your personal use of social media platforms, you must follow this Policy.

## 2.1 Definition of Social Media

For the purposes of this policy, the term social media shall include any form of online interaction that allows for the highly scalable publication of user-generated content of any kind (written word, audio, video, images) that is meant for general public consumption and uses interactive dialogue with others.

Social media includes:

- Social networking sites e.g. Facebook, LinkedIn;
- Video and photo sharing websites e.g. Instagram, Snapchat, YouTube;
- Micro-blogging sites e.g. Twitter;
- Weblogs, including corporate blogs, personal blogs or blogs hosted by traditional media publications;
- Forums and discussion boards such as Whirlpool, Reddit;
- Online encyclopedias such as Wikipedia; and
- Any other web sites or tools that allow individual users or companies to publish content online of a social nature.

Social Media is differentiated from traditional online publication in that the communication tends to be more dynamic, personal and interactive, and facilitates multi party conversations and dialogue. Static website content or messages sent via email or text message that are not related to a social media campaign, do not constitute Social Media.

Social Media is a dynamic and constantly evolving technology and any definition for this technology is meant to be illustrative and not exhaustive.

# 3 Minimum Standards

## 3.1 Approval for Business Purpose

To become an approved Company social media representative on any social media platform, you must obtain formal approval from the Head of Communications & Public Affairs (refer to [Appendix 1](#) for contact information).

### 3.2 Appropriate Representation

When contributing to social media for business purposes you are required to:

- Disclose that you are a Latitude employee and be clear about which business unit / function you are representing and what your role and accountabilities are;
- Ensure that the contribution is clearly marked as coming from Latitude and where possible reflect your name or initials as the person contributing;
- Disclose only publicly available information. You must not comment on or disclose confidential information (such as financial information, future business performance, business plans, imminent departure of key executives); and
- Ensure the information represented about the Company, its products and services is informed and factually accurate.

For customer specific enquiries refer to the minimum standards for Privacy and Security (section 3.5).

### 3.3 Individual Requirements

Each approved representative must:

- Obtain the appropriate approvals for representing the Company in social media (refer section 3.1);
- Complete all appropriate social media, product/service, compliance and risk training to update your knowledge on emerging trends, evolving best practice, and relevant Company compliance requirements, when requested to do so;
- Ensure that any content you publish is factually accurate and complies with relevant company policies, particularly those relating to confidentiality and disclosure;
- Ensure you are not the first to make an announcement unless you have received the appropriate internal clearances and approvals;
- Only offer advice, support or comment on topics that fall within your area of responsibility. For other matters, alert the relevant topic expert who is accredited for social media engagement and, if the situation requires a real time response, let the other party know that the request requires a response;
- Ensure you do not post material that is obscene, defamatory, threatening, harassing, discriminatory or hateful to another person or entity, including the Company, its employees, its contractors, its partners, its competitors and/or other business related individuals or organisations; and
- Ensure you do not disclose other people's personal information in social media venues, and comply with relevant privacy policy requirements.

### 3.4 Record Retention

For all interactions via social media there must be full traceability in either the tool being used to perform the posting or by adding notes at an account level, covering:

- Name of the person posting; and
- Date and time of the posting.

All records must be retained in line with the current Records & Information Management Policy. In particular, records must be obtainable by the Company within the required records retention timeframes and subject to appropriate quality and security controls.

### 3.5 Privacy & Security

All employees must adhere to all privacy obligations, principles and guidelines and customer security requirements when using social media.

Social media tools and processes must comply with existing information security requirements, including but not limited to user account and password requirements (regardless of the requirements of the tool provider), as defined by the Information Security Policy.

### 3.6 Business Process Controls & Monitoring

The Company is required to have an appropriate level of risk based process controls for compliance (external regulatory and internal policy), customer experience and security, including appropriate monitoring controls (being reporting and post process analysis). These controls must be established and reviewed in accordance with the Operational Risk Management Framework.

Monitoring controls should cover:

- Review of postings and contributions by Company social media representatives; and
- Review of responses or comments to postings on locations used by the Company for social media.

### 3.7 Personal Use of Social Media Platforms

When Company employees participate in personal Social Media activities, it is important that readers of their posts do not misconstrue the employee's personal comments as representing an official position.

In this respect every employee must ensure:

- They do not imply in any way that they are authorised to speak on the Company's behalf;
- Be mindful during their social media engagements of the importance of not damaging the Company's reputation, commercial interests and/or bringing the Company into disrepute;
- They do not comment on or disclose confidential Company information (such as financial information, future business performance, business plans, imminent departure of key executives);
- They do not include the Company Name, logos or trademarks in their postings; and
- They use an appropriate disclaimer to ensure that their stated views and opinions are understood to be their own and not those of the Company.

## 4 Policy Governance

### 4.1 Review, Renewal and Approval

The Head of Communications & Public Affairs (policy contact) shall review this policy at least annually and make any changes that may be required. The Head of Communications & Public Affairs (policy owner) is responsible for reviewing and approving all changes made to this policy.

Where an annual review results in no changes being made to the policy, re-approval by the policy owner shall not be required however; the policy owner is required to review and re-approve this policy at least once every three years, even if no changes have been made during that time.

### 4.2 Monitoring & Control

The policy owner will be responsible for identifying any instances of non-compliance (including potential non-compliance) under this Policy through (at least) annual self-assessments. Any noncompliance – actual or potential – must be highlighted to the policy owner as soon as possible.

### 4.3 Exceptions

Any requests for policy exceptions must be documented in writing and submitted to the policy owner for review and approval. Such requests must identify the Entity/Function/Individual requesting the exception, and the nature, timing and duration of the exception. The request must also include corrective action plans to rectify the exception and a proposed timeline for completion of the same.

## 5 Revision History

Version	Approval Date	Changed By	Summary of changes
1.0	25/11/2015	Bree Hammond	Original – Modified GE document
1.1	13/12/2016	Nafiah Ansari	Updated cover page. Formatting has been updated to align to the new Policy template. No changes have been made to policy content.
1.2	20/10/2017	Anthony Spargo	Contact details updated
1.3	15/01/2019	Michael Curry	Section 2.1 updated to reflect current social media platforms

## 6 Appendix 1 – Roles & Responsibilities

**Communications Team:** It is the responsibility of the Communications team to co-ordinate, approve, manage and run all contact with social media that has any corporate brand or reputational risk attached to it, including requests, speaking on behalf of the Company where a Company viewpoint or comment is required and managing relationships with key social media publications. This also includes potential media issues.

**Employees:** All employees should pass on any social media request issues immediately to the Communications Team.

**Communicator:** To speak on behalf of the Company where a Company viewpoint is required and to support Media Spokespeople doing the same.

### Contact Details

The contact details for the Latitude Communications Team are as follows:

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Head of Communications & Public Affairs, Australia & New Zealand

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## 7 Appendix 2 – Glossary

**Social Media:** Individuals, for example bloggers or reporters, that work for social media outlets (radio or television) or print outlets (newspaper) or online outlets with the aim to disseminate information to the public.

**Communications Team:** Employees working in the Communications and Public Affairs function, reporting to the Head of Communications and Public Affairs.

**Employees:** All company employees including contractors.

**Communicator:** Employee working in external communications or public relations.

**Media Spokesperson:** Media trained or experienced employees or associated individuals that have been given approval from the Communications Team, to engage with the media.