

SOCIAL MEDIA USAGE POLICY

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HB/HR/PL 009	Human Resource	New	October 2018

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1. POLICY OVERVIEW

Heckerbella Limited provides her Employees access to social networking sites to enable them leverage social media platforms to create business value in this space. This provides significant advantages to our business in terms of obtaining customer feedback and enhancement of online talent acquisition, etc. To ensure Employees are well informed and inspired by the information on social networks, Heckerbella Limited allows its Employees to access social networking platforms. However, inappropriate use of such platform might expose Heckerbella Limited to risks such as: productivity loss, Employee inefficiency, excessive use of bandwidth, damage to corporate reputation, legal issues, breaches of security, abuse and risks relating to data Privacy and confidentiality.

2. SCOPE

This policy shall apply to all Heckerbella Limited Employees, contract Employees, strategic partners, third-party Employees, vendors and others who provide services to Heckerbella Limited directly and/or indirectly.

3. PURPOSE

This policy provides guidelines on how Employees conduct themselves while accessing social media platforms/sites. It also aims to encourage Employees to find a voice in social media whilst informing them of their responsibilities in protecting the interest of Heckerbella Limited as well as themselves when accessing social media platforms/sites. The objectives of this policy include;

- 3.1. Define approved and prohibited social media access use.
- 3.2. Define controls to ensure secure access to social media sites.

4. POLICY STATEMENT

This policy provides guidance for Employee use of social media, which should be broadly understood for the purposes of this policy. It guides the use of blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.

5. POLICY GUIDELINES

5.1. Social Media Platform

Social media platforms are defined for the purposes of this policy as all online media sites which allow user participation and interaction including but not limited to:

- 5.1.1. Social networking sites, e.g. Facebook, MySpace, LinkedIn

- 5.1.2. Video and photo sharing web sites, e.g. Flickr, YouTube, Blip, Instagram, Snapchat
- 5.1.3. Micro-blogging and activity stream sites, e.g. Twitter, Yammer
- 5.1.4. Blogs and blogging platforms, e.g. WordPress, Blogger.
- 5.1.5. Forums and discussion boards, e.g. Trove Forum, Yahoo! Groups, Google Groups
- 5.1.6. Online encyclopaedias, e.g. Wikipedia
- 5.1.7. Any other web sites that allow individual users or organizations to use simple publishing tools e.g. wikis.

5.2. **Official Use of Social Media**

Only constituted authorities and any other designated persons are permitted to post material on the social media website in the name and/or on behalf of Heckerbella Limited. Any breach of this restriction amounts to gross misconduct.

5.3. **Professional Use of Social Media**

Professional use is when an Employee posts articles or comment on social media as an experienced person in his/her particular field and not as an Employee of Heckerbella Limited. For example, an HR personnel working with Heckerbella Limited might want to post an opinion about the future of work, which is not directly related to any Heckerbella Limited policy. High level of professionalism is required when using the social media platform.

5.4. **Employee Interaction on Social Media**

- 5.4.1. Any Employee who has Heckerbella Limited on his/her social network profile must provide a disclaimer making it explicit that their views do not represent those of the company e.g.: "This post, (or content, etc.) is for discussion purposes only and does not represent the official views of Heckerbella Limited. Any views expressed on this site are those of the individual author only."
- 5.4.2. Employees who do not explicitly identify themselves as Heckerbella Limited Employee should exercise caution while posting on social media as people can trace individuals to their places of work.
- 5.4.3. Employees must ensure all activities on such sites are in line with Heckerbella Limited policies and Code of Conduct.
- 5.4.4. Employees must not disclose official information unless authorized to do so
- 5.4.5. Employees must protect personal information entrusted to Heckerbella Limited from distribution into the public domain.

5.5. **Personal Use of Social Media**

Heckerbella Limited permits the use of social media websites for personal use

subject to certain conditions set out below. However, it is important to state that this is a privilege, not a right and the company reserves the right to withdraw its permission at any time and at its discretion. The use of social media websites must neither be abused nor overused.

- 5.5.1. Employees must adhere to Heckerbella Limited Values and Code of Conduct even when a material is posted anonymously, or using a 'nickname' or pseudonym when participating in private social media activity.
- 5.5.2. Employees should not rely on the privacy provided by the site's security settings, as material posted in a relatively secure setting can still be copied and reproduced elsewhere.
- 5.5.3. Use must be minimal and take place substantially out of normal working hours (e.g. during lunch hours, before 8 am or after 6.00 pm)
- 5.5.4. Use must not breach any of the rules set out in section 5.7 below.
- 5.5.5. Use must not interfere with business or office responsibilities
- 5.5.6. Use must be in compliance with Heckerbella Limited policies including Code of Conduct, the Data Protection Policy and Disciplinary Procedure.

5.6. **Rules for Use of Social Media**

In order to ensure adequate protection of company information, Heckerbella Limited makes it mandatory for Employees and third-party Employees while accessing social networking sites to comply with the following guidelines:

- 5.6.1. Before commenting on any social media site, Employees should observe the trend of social conversations to avoid using trigger words that may escalate the subject of the conversations.
- 5.6.2. When making use of any social media platform, Employees must read and comply with its terms of use.
- 5.6.3. Employees and/or third-party Employee shall not present personal opinions in ways that imply endorsement by Heckerbella Limited
- 5.6.4. Name, telephone numbers, email addresses, and images of Heckerbella Limited shall not be posted on social network profiles, for personal purposes. However, we encourage Employees to share and disseminate ads, visuals, images.
- 5.6.5. Employees shall abide by copyright laws and intellectual property rights, i.e. Employees shall not upload, post or forward any content belonging to a third party without seeking their consent.
- 5.6.6. Before including a link to a third-party website, Employees must check that any terms and conditions of that website permit them to link to it. The links must be done such that it is clear to the user that they have moved to the third party's website.

- 5.6.7. Proprietary information e.g. company's financial information, intellectual property, information about customers, etc. must not be discussed or referred to on social media sites or in private messages between site members who have authorized access to the information.
- 5.6.8. Social networking sites are prone to auto-download of viruses and spyware. It may damage the operating system, capture data, or otherwise compromise privacy of the computer and the network, as well as affect others with whom the Employee may communicate. Therefore, Employees and third-party Employee shall exercise due diligence while sharing and downloading files on social networking sites.
- 5.6.9. Employees and third-party Employees shall not refer or cite clients, partners, or customers of Heckerbella Limited without their express consent. In all cases, Employees shall not publish any information regarding a client.
- 5.6.10. Personal blogs shall include a disclaimer that Employees' opinions do not represent those of Heckerbella Limited, wherever appropriate.
- 5.6.11. Employees must be honest and open, but mindful of the impact their contribution might have on people's perceptions of Heckerbella Limited as a company
- 5.6.12. If an Employee makes a mistake in a contribution, they must be prompt in admitting and correcting it. It is imperative to notify the Human Resources Team before making any follow up on comment for guidance.
- 5.6.13. Employees are personally responsible for content they publish on social media platforms; they should be aware that what they publish will remain public for many years.
- 5.6.14. Employees must always consider others' privacy and avoid discussing topics that may be inflammatory e.g. politics and religion

5.7. **Prohibited Uses of Social Media**

All Employees of Heckerbella Limited are reminded that the use of Company's resources while accessing social media should never be abused nor inappropriately used. Heckerbella Limited explicitly prohibits the use of its electronic communication systems for any of the following purposes:

- 5.7.1. Forwarding an Employee's Microsoft Outlook/Lotus Notes email from the Company's network to the Internet.
- 5.7.2. Disseminating, viewing, downloading, storing, forwarding or transmitting sexually explicit material or other potentially offensive information, including profanity, pornography, tasteless jokes, material that is bigoted, derogatory, discriminatory or harassing to any specific group (i.e. any material inconsistent with the organization's values, policies and Code of Conduct) is strictly prohibited.

- 5.7.3. Engaging in any criminal activity.
 - 5.7.4. Unauthorized dissemination of internal organization documents or other communications outside the organization.
 - 5.7.5. Any use of SaaS (Software as a Service) software, e.g. Google Docs, or use of public file sharing software or any such service hosted on the Internet for sharing official documents.
 - 5.7.6. Making unprofessional comments about the organization in public forums/ electronic media
 - 5.7.7. Unauthorized soliciting of money or the operation of a personal business.
 - 5.7.8. Deliberate dissemination of inaccurate information.
 - 5.7.9. Dissemination of chain letters, junk email or similar correspondence.
 - 5.7.10. Download or storage of materials (including software) protected under copyright law, or electronic files intended for non-business use (e.g. music or video files etc.)
 - 5.7.11. Gaining unauthorized access to any computer system of Heckerbella Limited or any other organisation or entity.
 - 5.7.12. Transmitting of threatening messages.
 - 5.7.13. Downloading executable files without exercising extreme care. Executable files (e.g. shell scripts) may be 'Trojan Horses' or other such viruses containing commands designed to corrupt the system or to compromise security.
 - 5.7.14. Usage of Heckerbella Limited's network/Internet facilities to deliberately propagate any virus, worm or any other code with malicious intent such as spy-ware, hacking tools, etc.
 - 5.7.15. Using high bandwidth usage applications such as streaming media, Internet radio, etc. Access to any such websites must be justified by a valid business need.
 - 5.7.16. All existing organization policies such as non-discrimination, prevention of harassment, professional standards and protection of confidentiality apply equally to the technology environment. Violations of any of these policies, while accessing social media, may lead to disciplinary action including dismissal and/or other sanctions.
- 5.8. **Monitoring Use of Social Media Sites**
 Employees should be aware that any use of social media websites (whether or not accessed for work purposes) may be monitored and, where breaches of this policy are found, action may be taken under Heckerbella Limited's Disciplinary Procedure and Consequence Management Policy.
- 5.8.1. In response to concerns or complaints related to information provided by individuals, Heckerbella Limited may look up profiles on social networking

sites and may use the information therein to initiate disciplinary proceedings against the Employee and third-party Employee

- 5.8.2. Heckerbella Limited reserves the right to restrict or prevent access to certain social media websites if we consider personal use to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

6. ROLES & RESPONSIBILITY

6.1. Human Resources.

- 6.1.1. Circulation of this policy to all Employees within its scope
- 6.1.2. Prompt investigation and action on any report of misuse or violation in line with the Code of Conduct and Disciplinary procedure, as well as the appropriate investigation team.

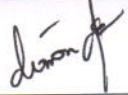

6.2. Employee

- 6.2.1. Reads and understands this Policy.
- 6.2.2. Seeks clarifications from HR on any aspect of this policy, where required
- 6.2.3. Abides by the guidelines and rules of this policy
- 6.2.4. Promptly reports any violation of the rules of this policy to his/her line manager or HR as applicable

6.3. Information Services

- 6.3.1. Monitoring of Employee's access to Social Media sites in line with the policy
- 6.3.2. Prompt reporting of any misuse or violation to HR department for investigation and action.

APPROVAL

Approval	Name	Job Title	Signature	Date
Reviewed by	Patience Diamond	Human Resource Manager		21/11/18
Reviewed by	Peter Okiti	Chief Operations Officer		21.11.18
Approved by	Yemi Keri	Chief Executive Officer		