

SOCIAL MEDIA POLICY

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Related Documents	Information, Communication and Technology Security Policy Bullying and Harassment Policy Confidentiality Agreement
Date	31 August 2021
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Approved By	Board
Version	2
Responsible Officer	HR Manager
References and Legislation	Relevant Industrial Instrument – Employment contract, Award, Enterprise Agreement Privacy Act 1988 (Cth)

1. **POLICY**

Steinhardt Corporation Pty Ltd as trustee for Steinhardt Family Trust (trading as Macadamias Australia), and Farmfresh Beneficial Holdings Pty Ltd as trustee for the Farmfresh Fine Foods Unit Trust (trading as Farmfresh Fine Foods), hereafter referred to as the ‘Steinhardt Group’ recognises that social media has become an integral part of modern life. It keeps us in touch, informs us about our world, and gives us a platform to be heard. As a business we use it as a way to engage with the community and our consumers. Our aim is to encourage positive, productive communications that professionally represent Steinhardt Group while protecting our employees and Steinhardt Group from security breaches, legal liability, and reputation damage. It is important for employees to remember that when discussing Steinhardt Group, our brands, or our business, all company policies, codes of conduct, and employment obligations still apply.

Steinhardt Group respects an employee’s right to freedom of speech but discourages inappropriate conduct on such forums that have the potential to damage the Steinhardt Group reputation and image or potentially be harmful to other employees or contractors. It is essential that we do not disclose confidential information on social media and employees must continue to respect all copyrights, trademarks, and rights of publicity when posting on social media platforms.

Employees utilising social media must understand that comments posted online are typically available and accessible to a larger audience than they may have intended. You are responsible for your actions, and we encourage you to use sound judgement and common sense. Apart from the potentially adverse effects a social media posting may have on Steinhardt Group, they can also have adverse consequences for an employee or contractor in terms of future career prospects, as the material remains widely and permanently accessible to other site users. Particular care must be taken to ensure no material is posted that may directly or indirectly defame, harass, discriminate, or bully any team members, suppliers, or contractors.

This Policy provides guidance on the appropriate use of social media.

2. **SCOPE**

This Policy applies to Steinhardt Group employees, external consultants, and contractors.

It includes interactions using technology provided by Steinhardt Group as well as personal devices such as mobile phones and tablets.

It covers the use of social media in a professional capacity and in a personal capacity if it refers to Steinhardt Group our products, or our business.

This policy should be read in conjunction with the Information, Communication and Technology Security Policy and the Steinhardt Group Employment Contracts or Enterprising Agreements (EA) (employees) and/or a Contract of Service (consultants/contractors).

3. DEFINITIONS

Social Media means websites and internet-based applications used for social networking/interaction, sharing of information/content and creation of communities through online networks of people. Examples of social media channels to which this policy relates include the following:

- Social networking sites e.g. Facebook, Twitter, LinkedIn
- Video and photo sharing sites e.g. YouTube, Flickr, Instagram,
- Weblogs including corporate blogs and personal blogs
- Forums and discussion boards
- Online encyclopaedias such as Wikipedia
- Any other website that allows individual users or companies to use simple publishing tools.

4. REPRESENTING STEINHARDT GROUP ON SOCIAL MEDIA

In consideration of the type of business of Steinhardt Group, any comments made on a social media platform must be factual and the information consistent with Steinhardt Group goals and objectives. This means protecting commercially sensitive information in accordance with the Steinhardt Group Employment Contract or Enterprise Agreement (employees) and/or a Contract of Service (consultants/contractors).

Employees, consultants, and contractors may not make comments on behalf of the Steinhardt Group or use the Steinhardt Group branding for work related purposes or personal purposes (including all Steinhardt Group logos, internal logos, or registered trademarks) in any social media platform unless otherwise authorised. If approval is given, it is subject to continuing compliance with this Policy.

Apart from the posting of approved marketing content or recruitment advertising, only the following individuals are authorised to speak on behalf of Steinhardt Group on social media platforms:

- (a) Janelle Gerry - Director
- (b) Kevin Steinhardt – Director
- (c) Trevor Steinhardt – Director
- (d) Andrew Gerry – General Manager

Steinhardt Group recognises that circumstances may arise in which employees', consultants and contractors make mention of Steinhardt Group in social media. Unless authorised by Steinhardt Group, any comments made by employees, consultants and contractors must contain a disclaimer that they are not representing the Steinhardt Group and do not have authority to speak on behalf of the Steinhardt Group and that the views of the employees/consultants/contractors do not necessarily represent the views of Steinhardt Group.

5. ACKNOWLEDGEMENT

All employees, consultants and contractors acknowledge that:

- a) they are not to make comments which may reflect negatively on the Steinhardt Group reputation or make deliberately false or misleading claims about Steinhardt Group, or its

- b) products or services. Any recognised inaccurate comments must have all reasonable efforts made by the employees, consultants, or contractors to correct the statement;
- c) they must not disclose confidential or commercially sensitive information about Steinhardt Group. This obligation continues after the employment or engagement ceases;
- d) they must not endorse or cite any customer, director, manager, or supplier of the Steinhardt Group without the explicit prior permission of those authorised to speak on behalf of Steinhardt Group as outlined in Section 4;
- e) they must observe the relevant privacy, defamation, and copyright laws; and
- f) they must comply with relevant discrimination laws and Steinhardt Group policies that relate to discrimination, bullying and sexual harassment.

6. MATERIALS POSTED BY OTHERS

Inappropriate or disparaging content and information stored or posted by others (including non-employees) in the social media environment may also damage the Steinhardt Group reputation. If you become aware of any such material, you must immediately notify at least one of the directors.

7. EXTERNAL SOCIAL MEDIA PLATFORMS

Generally, social media posts by those authorised personnel listed in Section 4 will be:

- a) Part of a marketing strategy developed and approved by Steinhardt Group;
- b) Part of an overall communication strategy targeting specific stakeholder groups;
- c) Part of an approved approach to communicating information regarding Steinhardt Group to its customers and wider industry community e.g. updates via Twitter or LinkedIn groups on new products.

Steinhardt Group acknowledges that, generally, activities carried on outside of your employment are your own affair. However, activities that impact on or affect your job performance, the performance of others, or Steinhardt Group business interests or reputation, or those of its customers or clients, are covered by this policy. This includes social media activity using a Steinhardt Group computer and internet resources or whilst using a non-Steinhardt Group computer, mobile phone, or handheld device (e.g. iPad). Accordingly, in your personal use of social media you must follow these guidelines:

- a) You must not refer to Steinhardt Group or its employees, consultants, contractors, or agents in a derogatory or negative manner;
- b) If you cite Steinhardt Group in your employment or professional profiles, you must ensure that the information is accurate and up to date;
- c) You must not 'tag' or identify as relating to Steinhardt Group, any images or videos taken at company events or social occasions, without prior written approval from by those authorised personnel listed in Section 4. This will include, for example, photographs of client events in which Steinhardt Group logos are visible;
- d) If you have a personal blog and wish to post content referring to Steinhardt Group or from which Steinhardt Group could reasonably be identified, you must ensure that those authorised personnel listed in Section 4 approve the content before you post it;
- e) You must not represent any social media posts as being the views of Steinhardt Group;
- f) You must not engage in conduct online that is likely to bring Steinhardt Group into disrepute or otherwise damage its interests;
- g) Using social media platforms for personal purposes during work hours must be kept to a reasonable minimum.

Employees, consultants, and contractors should be aware that, in accordance with the ICT Security Policy, internet usage is continuously logged and archived by Steinhardt Group for monitoring purposes on an ongoing basis.

If it comes to the Steinhardt Group attention that an employee, consultant, or contractor has made inappropriate and/or unauthorised comments about Steinhardt Group or an employee, consultant or contractor, Steinhardt Group may take action against such person(s) as outlined in this Policy. Action will not be limited to contributions made on a social media platform made whilst using a Steinhardt Group computer and internet resources but may include action taken as a consequence of inappropriate and/or unauthorised contributions made about Steinhardt Group, an employee, consultant or a contractor via a non- Steinhardt Group computer or handheld device.

8. RESPONSIBILITIES

Employees, consultants, and contractors are personally responsible for reporting any inaccurate, misleading, or deceptive information they encounter about Steinhardt Group and its products and services, to at least one of the directors.

9. CONSEQUENCES OF BREACHING THE SOCIAL MEDIA POLICY

Apart from the potentially adverse effects a social media posting may have on Steinhardt Group, inappropriate postings on internal or external sites can also have adverse consequences for an employee or contractor in terms of future career prospects as the material remains widely and permanently accessible to other site users.

Any breach of this Policy may result in disciplinary action, including, but not limited to, issue of a warning, demotion, suspension, or termination of employment (or, for consultants and contractors, the termination or non-renewal of their contract for service). Any action taken will be in accordance with the Disciplinary Policy and Termination Policy.

10. DOCUMENT CHANGE CONTROL

Approval and Amendment History	Versions	Description	Name and Signature of Approval
Board 31 May 2019	V1	New policy drafted 31 May 2019	Janelle Gerry – Director
HR Manager	V1.1 – V1.2	Changes made see Document Control Management Register in HR 'I' Drive in Steinhardt Group Policy Folder	Board 27 April 2020
Board 2 September 2021	V2	This document supersedes any other Social Media Policy for Steinhardt Group	Board