

VUNANI

LIMITED

**SOCIAL MEDIA POLICY**

**&**

**GUIDELINES**

## **INTRODUCTION**

Social Media platforms like Facebook, YouTube and Twitter are changing the way people behave online, linking hundreds of millions of people together through communication and interaction with each other. As Social Media has evolved, so have its influences. Customers no longer rely only upon company literature, published product reviews and direct word-of-mouth recommendations. Instead they are immersed in a world where products and services are openly and widely discussed online, making Social Media a potentially powerful influence in any purchase decision. The full impact of Social Media on how we interact with customers and each other as employees is not always clear. Vunani has developed these Guidelines, which will evolve over time, to help employees make sensible decisions about their online interactions as well as provide clear direction on the importance of protecting the reputation of Vunani Limited and its entities (“Vunani”).

Vunani is committed to responsible business conduct, fair competition and integrity, as well as refraining from any conduct that could place the company or its employees in a bad light. Vunani occasionally monitors Social Media platforms for any contentious or branding issues.

Vunani respects its employees’ rights to openly express their views outside the workplace. When discussing issues regarding Vunani through Social Media, however, employees need to be conscious that their online postings may be viewed as those of Vunani’s.

The following Social Media Guidelines (the “Guidelines”) are not intended to stop employees and employed agents from engaging in Social Media in their personal lives. Rather, they are intended to provide employees with guidance on how to interact with common sense and in accordance with Vunani’s existing Employment Contracts and Policies, as well as applicable laws, regulations and ethical standards. The Guidelines will also help to preserve Vunani’s and its employees’ reputation. If you have any questions or need help, please contact your CEO or Business Head.

The Guidelines do not limit any employee’s rights to engage in any activity protected by applicable laws and regulations.

## **GUIDELINES**

### **1. SCOPE AND APPLICABILITY**

These Guidelines apply to all Vunani employees and employed agents/service providers.

If your Social Media activity is linked to your employment relationship with Vunani, Vunani has a legitimate interest in the respective content and you are obliged to fully respect these Guidelines, since the posting of confidential or proprietary information, discriminatory comments, or comments disparaging Vunani or our competitors may put Vunani at risk. Please note that even if you do not include a direct reference to Vunani, your statements might nevertheless be perceived as a statement by Vunani, because information about your employment relationship might be available from other sources, especially from other internet sites.

**Your Social Media activity is linked to your employment with Vunani when:**

You make a post on a Social Media site that relates to Vunani, or identifies you as a Vunani employee, regardless of the topic discussed. This is the case if Vunani is expressly mentioned or can be easily recognized due to other information readily available on the internet.

***These Guidelines apply to all existing and new Social Media sites.***

**2. SOCIAL MEDIA ROLES**

**The Guidelines differentiate between the following two roles:**

- **Personal use for private and work-related topics** as an employee, you can engage on any Social Media platform. You speak with your own voice, share your own opinion, which can be private or work-related and you clearly state, that these views are your own and may differ from the view of Vunani. This role applies to the majority of Vunani employees. *In this role you must follow the rules of “Engaging in Personal Use of Social Media” (see section 2.1 below).*

- **Spokesperson in Social Media** In this role you act as an official Vunani ‘Social Media’ Spokesperson on a designated Social Media channel and you are therefore one of the official “Vunani voices”.

To get the permission to do so, you need to apply for this role and deliver proof of a thorough business need for such a role and activities. The Social Media Spokespersons are selected and trained by Media Relations. *In this role, in addition to the basics in Section 2.1, the rules of “Engaging in Social Media in an Official Vunani Capacity” apply (see section 2.2)*

**Social Media Guidelines**

In both cases, use of Social Media during work hours is governed by Group and local internet usage policies and local employment contracts. Check what is permissible at your location.

**2.1 Engaging in Personal Use of Social Media**

It is not Vunani’s intention to tell you how you should engage in the personal use of Social Media. However, as soon as explicit or implicit reference to Vunani or your employment at Vunani is made, bear in mind the following principles:

**2.1.1 Identify yourself, make clear you are speaking for yourself and write in the first person**

It should be clear that the opinions you express are your own and not the opinions of Vunani. Use a well visible disclaimer, such as: *“I’m a Vunani employee but the postings on this site are my own and don’t necessarily represent Vunani’s position, strategy or views.”*

Do not impersonate another person or use a fake username or a username that you are not authorized to use. Some Social Media platforms specifically prohibit the use of fake usernames.

**2.1.2 Your Vunani e-mail address and other credentials are only for your job**

Do not use your official Vunani e-mail address or any other Vunani credentials (username, password) when participating in online Social Media that is not related to your job.

**2.1.3 Always adhere to basics codes of behaviour and/or HR policies across the Vunani businesses**

Namely, other applicable Vunani policies and applicable laws and regulations. All employees are subject to any Vunani policies that apply (the Vunani basic employment contract) and, in addition, are governed by a confidentiality obligation covering the disclosure of corporate information. Accordingly, you are not allowed to publish Vunani's or a third party's confidential or proprietary information. This includes financial information, future earnings or forecasts, and the names of customers or suppliers, or anything related to Vunani's products and services, strategy or management that has not been made public.

**2.1.4 You are responsible for your actions**

Anything you post that can potentially tarnish Vunani's image will ultimately be your responsibility. When participating in online Social Media, Vunani urges you to do so properly, exercising sound judgment and common sense. It is a criminal offence to spread harmful or bigoted messages online.

**2.1.5 Do not speak on behalf of Vunani**

It is recommended that you do not comment on statements relating to Vunani. However, if you comment as a private person, your comment must be factual and accurate, with the disclaimer that the opinions are your own (see disclaimer provided in paragraph #1). Rumours and speculation must not be posted. As a Vunani employee always consider your duty of loyalty towards Vunani. Any media inquiries must be directed to a designated Vunani Spokespersons (CEO or Business Head) to handle accordingly.

**2.1.6 If in doubt, don't comment**

Exercise sound judgement and common sense and do not post information you might later wish to retract. Nothing is permanently erased on any Social Media platform. If you have any doubt, don't publish anything and contact the appropriate business leader at Vunani for further guidance.

**2.1.7 Conflicts of interests in addition to your identification.**

Disclose any potential conflicts of interest with regards to your statement.

**2.1.8 Do not conduct business within Social Media spaces**

Do not conduct any business related to Vunani, promote any Vunani products or offer any professional advice related to Vunani (e.g. legal, tax or investment advice) unless it is done as

part of your job and specifically permitted by Vunani.

**2.1.9 Avoid discussing Vunani’s competitors**

Leave this discussion to designated Vunani Spokespersons and media specialists. Even if you think you know the facts, you shouldn’t be engaging in any discussions relating to Vunani’s competitors.

**2.1.10 Respect copyright laws and other intellectual property**

Do not use Vunani’s trademarks, brand name, tagline, slogans or other trademarks – e.g. do not use the Vunani logo, or any other trademark, as your screen name, profile picture or ‘social media avatar’. Do not upload or post content that may infringe a third party’s right including intellectual property, privacy and publicity rights (e.g. songs, clips, photographs, images, logos or other protected material) without having secured the proper licenses or authorization. Always link or cite sources to give credit where necessary. Don’t post someone’s picture or photographs on any Social Media platform unless you have that person’s permission to do so or discuss a conversation that was meant to be private.

**2.1.11 Alterations**

To maintain integrity, do not alter previous posts without indicating that you have done so.

**2.1.12 Personal Data**

Be mindful before posting your personal data, because what you publish will be public for a very long time. Look closely at all privacy settings and mindfully decide on the appropriate option. Do not upload personal data (which includes photos) of third persons such as employees, customers, suppliers, unless they have consented. Please note that under certain circumstances and in certain jurisdictions a prior written consent may be required.

**2.1.13 Malware**

Be careful not to transmit or upload any material that may contain viruses, worms, or any other harmful programs or ‘malware’.

**2.1.14 Keep it appropriate and polite**

When disagreeing with others’ opinions do so in a polite and respectful manner. For example, don’t use ethnic slurs, obscenity or insults.

**2.1.15 Be professional**

In tone and content. Be respectful of your audience. Take the time to reflect on what you post, including checking it for logic and grammar. It will reflect on you and may affect others views of Vunani.

**2.1.16 Recommendations, References, etc.**

Do not post recommendations, references or write formal or informal employee reviews for current or former Vunani employees, contractors or suppliers on Social Media sites, particularly on LinkedIn, unless clearly mentioning that such statement only reflects your

personal view. Refer to the staff handbook when it comes to the giving of references.

#### **2.1.17 Online interaction between managers and other employees.**

Just as with any activity or conduct that could potentially interfere with the employment relationship, managers should exercise appropriate professional judgement when interacting with their subordinate employees via Social Media sites.

***Note: Vunani reserves the right to take measures if inappropriate behaviour is discovered.***

## **2.2 Engaging in Social Media in an official Vunani capacity**

### **2.2.1 As a designated Vunani 'Social Media' Spokesperson**

Opinions and statements posted on Social Media sites by Vunani employees on finance-related topics will most likely be perceived by third parties as an official Vunani opinion or position. Therefore, only designated individuals can speak on behalf of the company. Vunani aims to manage its reputation online as it does in traditional media. To do this, Vunani Spokespersons are designated to represent Vunani through selective engagement in online discussions as well as traditional media.

As a Vunani 'Social Media' Spokesperson you may have to do additional training and establish additional monitoring and compliance tools for your designated channels. You will also be responsible for the post handling and incident management process. As a Vunani 'Social Media' Spokesperson, you ensure that any Social Media activity in your area is integrated into the traditional media or standard crisis communication plan for Vunani.

If you are not a designated Vunani 'Social Media' Spokesperson you must refrain from commenting on behalf of Vunani or give the impression that you are commenting on Vunani's behalf.

### **2.2.2 As an initiator of Vunani-related Social Media accounts**

To set up an official external site representing Vunani, using Vunani trademarks and conducting business with Vunani-related Social Media accounts (such as Facebook, LinkedIn, YouTube sites or a Twitter account) employees need to get permission before doing so from the CEO or Business Head.

Furthermore, in principle and if possible, Social Media accounts should be registered in the name of a Vunani entity. If the account needs to be in the name of a person, a Senior Marketing, Business Manager or Media Relations Manager should register the account in his or her name.

***Note:*** People who have Social Media account details must hand over such details to Vunani when they leave Vunani. All ownership rights arising from establishing a Vunani-related Social Media account will be either generated directly in Vunani or vested automatically after establishment of the account in Vunani or will be transferred to Vunani when the employment relationship between Vunani and the initiator of the account is terminated, as applicable.



As an initiator of a Vunani-related Social Media account, you're required to comply with the terms and conditions of the respective Social Media platform and learn about the pre-defined privacy settings and the possibility to change such settings. Privacy settings need to be updated adequately. Noncompliance with the site's terms of use potentially exposes Vunani to breach of those terms and suspension of the overall use of such a site impacting Vunani's other uses/users of the same site.

Marketing is usually/ultimately responsible for a consistent and Group-wide aligned set-up of Vunani-related Social Media sites. This must be controlled by Head of Marketing.

### 2.2.3 Posts about Vunani on Social Media

Posts about Vunani on Social Media can vary, ranging from positive to critical for Vunani's reputation. Different posts will require different responses. Vunani could use a traffic-light system (Green/Orange/Red) approach to classify posts.

For example, when you notice posts that relate to:

- Vunani and contain confidential, proprietary or misleading information or infringe Vunani's intellectual property rights, are defamatory or otherwise damaging Vunani's reputation, or a
- Vunani employee, a Vunani customer or a business partner of Vunani in a negative way

#### *Then do what?*

- Refrain from commenting on or engaging on post unless you're a designated Vunani Social Media Spokesperson.
- If you have been insulted or inappropriately treated, do not engage in an online dispute. Solve the matter professionally and state the facts, but do so in a clear, polite and respectful way. You can always seek guidance from CEO / Business Head.
- Report such negative posts immediately to the appropriate contact.

A Vunani Business leader and/or Social Media Spokesperson will ensure the monitoring of posts related to Vunani and that the right measures are taken to avoid any severe situation in a timely manner.

### 2.2.4 Local Guidelines

If business, regulatory or local legal requirements are more stringent than the requirements in these Guidelines, then local Guidelines may be issued. Any additional local Guidelines need to include a reference to clarify that they are based on these Guidelines and as such need to be consistent with these Guidelines.

If unavoidable due to mandatory law or regulation, local Guidelines may deviate from and will prevail over these Guidelines as an exception. Any such amendments should be indicated and submitted for information prior to becoming effective.

[Amendments due to specific business requirements need to be submitted for



approval/adoption prior to becoming effective.]

If in doubt, please consult with the appropriate local contact (CEO / Department Head) who will consult with other relevant stakeholders, such as Legal, Compliance and Risk Management and/or Business Leader.

### **Social Media Guidelines:**

#### **What is Social Media?**

Social Media is a term used to describe the type of online activity that is based on conversation and interaction between people. Social Media is designed to be disseminated through social interaction, using highly accessible publishing techniques. Social Media uses web-based technologies to transform and broadcast media monologues into Social Media dialogues. Examples of Social Media platforms are Facebook, YouTube, Twitter, Yammer, Instagram, LinkedIn, Pinterest, foursquare and Google+.

#### **When is personal use of Social Media related to Vunani?**

Personal use of Social Media is related to Vunani when you post on a Social Media site and there is a connection to Vunani or your job at Vunani, e.g. you contribute to a forum discussion on Facebook on an industry-related topic. Your connection to Vunani or your job at Vunani may be explicitly or implicitly made.

Here are some examples:

#### *Explicit connection:*

- You sign a post with your name and role at Vunani.
- You mention in your post that Vunani is your employer.

#### *Implicit connection:*

- You identify yourself in an industry-related post with your name and do not explicitly mention Vunani, but other readily available sources such as LinkedIn provide information that you work for Vunani.
- You refer to a subject that could only be interpreted as referring to Vunani.

***I'm contributing posts on a Social Media site focusing on holiday recommendations; my posts do not display any information that I work for Vunani nor is my email address the one that I was provided with by Vunani. Are these Guidelines applicable?***

No, in that case they are not applicable. They would be applicable as soon as you provide any information that would link explicitly or implicitly to Vunani, be it in a post, in your contact details or otherwise. Remember, do not use your Vunani email address for activities on Social Media sites unless the content of your postings is related to your line of work.

***A new Social Media site was launched, focusing on financial services. Can I post on this site?***

Yes, you can. But keep in mind that you should post only facts that are interlinked with your role at Vunani. Refrain from commenting or contributing posts that are not related to your specific role

although you work in the financial services industry. Remember to identify yourself and make clear you are speaking for yourself and that the opinions you express are your own. It is important not to imply that you act as a designated Vunani Spokesperson.

***I really enjoy working for Vunani and want to support the Vunani brand by hosting a Social Media fan page. Can I launch a Vunani fan page on Facebook?***

Before actively launching any site using the Vunani brand or any other Vunani intellectual property, you must send a written request / report to management and seek approval.

In any event, your posts on those sites must comply with the rules set forth in these Guidelines.

***If I have been given approval to set up a Social Media, am I free in creating the design?***

You need to adhere to Brand Guidelines provided by Vunani Limited and all related entities. Vunani will assist you in any matter regarding layout and strategy.

***I came across a negative post about Vunani. How should I respond?***

Do not engage in any online dispute. Raise it with management.

***I came across a Social Media site relating to Vunani. It is very clear that this site is not an officially approved and launched Vunani site. Should I get involved in this site?***

Please do not contribute postings to this site. Sites that refer to Vunani but are not officially approved by Vunani can be misleading and jeopardize Vunani's reputation. Therefore, Vunani relies on your help to inform Group to assess necessary measures and protect Vunani's reputation and brand in conjunction with Legal and Compliance.

***Are wikis such as Wikipedia considered Social Media? What if I come across an entry on a wiki?***

Yes, wikis are considered Social Media – they are free of charge and can be edited by anyone. They usually provide information on various things and can be looked at as a collaborative online lexicon. You should not contribute or make entries to wikis about Vunani. Adding entries to wikis should only be done by the appropriate function or a designated Vunani Spokesperson after approval has been given and a clear need for an entry is justified by business purposes.