

## Social Media Policy

### PURPOSE

This policy sets out guidelines for the use of social media by our employees. This policy does not aim to control an employee's usage of social media but encourages employees to think about how and what they are communicating on social media and how this may be reflective of E4 People.

This policy is intended to operate consistently with the *Fair Work Act 2009 (Cth)*, privacy legislation, anti-discrimination laws, and E4 People's obligations to maintain a safe, respectful, and lawful workplace, including online conduct that may impact the workplace.

### SCOPE

This policy applies to all of our employees, anyone who performs work for us and anyone who performs work on our premises (referred to collectively in this policy as "employees"). It applies to all social media activity undertaken by employees.

This policy applies whether social media activity occurs during or outside working hours where there is a connection to E4 People, its employees, clients, candidates, or reputation.

### POLICY

E4 People expects all employees to act responsibly, exercise good judgement and respect confidentiality when communicating information on social media that identifies E4 People. We recognise that your participation in social media is a personal activity; however, as an employee you are a representative of E4 People and you have a responsibility to protect the company at all times.

Information you place on the internet can easily become available to our clients, suppliers and the general public. As an E4 People employee and representative of the company, you should always present our company in a positive light.

Nothing in this policy is intended to unlawfully restrict an employee's right to engage in lawful out-of-hours conduct. However, disciplinary action may occur where social media activity has a relevant connection to employment and causes, or is likely to cause, reputational damage, breaches confidentiality, or undermines workplace relationships or safety.

### What Is Social Media?

Social media is any online media that allows user participation and interaction. This includes but is not limited to:

- social networking sites, e.g., Facebook, Instagram, Snapchat, X, LinkedIn, WhatsApp, TikTok and other messaging-based social platforms
- video and photo sharing websites, e.g., Flickr, YouTube, Instagram, TikTok
- micro-blogging and activity stream sites, e.g., X, Yammer
- blogs and blogging platforms, e.g., WordPress, Blogger, Tumblr
- forums and discussion boards, e.g., Reddit, Yahoo! Groups, Google Groups
- online encyclopaedias, e.g., Wikipedia
- any other digital medium that allows individual users or companies to use simple publishing tools, that exist now or in the future.

## **Social Media Activity**

Social media activity means any activity undertaken on social media. This includes, but is not limited to:

- any communication made via social media;
- uploading photos, videos or audio files;
- making comments;
- sharing social media posts of other people;
- creating social media profiles;
- blogging;
- participating in discussion boards or forums;
- managing contacts, including, adding or deleting contacts;
- reporting material posted on social media sites.

## **USE OF SOCIAL MEDIA**

### **Social media activity for business purposes**

Social media activity carried out for business purposes means:

- social media activity carried out from a private account as our representative;
- maintaining a profile page for E4 People on any social or business networking site;
- commenting on such networking sites for and on behalf of E4 People;
- writing or contributing to a blog and/or commenting on other people's or business' blog posts for and on behalf of E4 People; and/or
- posting comments for and on behalf of E4 People on any public and/or private web-based forums or message boards or other internet sites.

Employees must obtain prior approval before engaging in any social media activity for business purposes.

Employees must not create, modify, or close any E4 People social media account without written authorisation from Management or a Director.

When engaging in social media activity for business purposes, employees must:

- act in the best interests of our business at all times;
- not engage in any social media activity that may bring our business into disrepute or have a negative effect on our business;
- remain impartial, apolitical, professional and sensitive to the diversity of the public;
- not disclose personal views or opinions;
- not engage in social media activity that is discriminatory, abusive or otherwise objectionable in content;
- not make any commitment to any action or initiative on our behalf without first obtaining the appropriate approvals;
- comply with all of our policies;
- not disclose confidential information unless authorised to do so;
- not defame or slander any person;
- not breach any privacy legislation or policies;
- not post photos, videos and/or voice recordings that were taken at E4 People unless the employee has permission to do so;
- not infringe any other persons' intellectual property rights (such as copyright);
- always cite or acknowledge content sources when they are known.

## **Images, Videos and Written Consent**

E4 People is committed to protecting the privacy, dignity and rights of candidates, residents, patients, clients and employees.

Employees must not post, share, upload or otherwise distribute any image, video, audio recording or identifiable information of a candidate, resident, patient, client or employee on any social media platform (including business or personal accounts) without:

- prior written approval from Management; and
- a signed, informed consent form from the individual (or their authorised representative where applicable).

Consent must:

- clearly state how and where the image or content will be used;
- be voluntary and informed; and
- be obtained prior to any content being published.

All signed consent forms must be saved in the designated Social Media Consent folder on E4 People's OneDrive immediately upon receipt. Employees must not store consent forms locally, on personal devices, or outside the approved company storage system.

Where consent is withdrawn, the content must be removed immediately where reasonably practicable.

Under no circumstances are employees permitted to post images or videos taken within client facilities (including aged care facilities or healthcare environments) without explicit written authorisation from both the facility and the individual concerned.

Failure to comply with this section may result in disciplinary action, up to and including termination of employment.

### **Social media activity for professional purposes**

Social media activity for professional purposes occurs where an employee is not directly representing us but is commenting personally as an experienced person in their field.

Employees engaging in social media activity for professional purposes must:

- comply with all of the guidelines for social activity carried out for business purposes, except that they may disclose personal views and opinions (provided doing so will not harm our business);
- ensure they clearly state that any views expressed are their own and do not represent the views of E4 People;
- not post, share, or comment on candidate, client, or employee information without lawful authority and informed consent, in accordance with the *Privacy Act 1988 (Cth)*;
- avoid commenting in depth on the activities of our business, unless it is in relation to information known to the public.

### **Social media activity for personal purposes**

When engaging in private social media activity, employees must:

- act in the best interests of our business at all times;
- protect confidential information at all times. Online postings and conversations are not private. Please realise that what you post or comment can remain online for a long time and could be shared with others. Given that, we ask you not to disclose confidential or other proprietary information belonging or related to E4 People;
- use their own personal email to register for social media accounts. Please refrain from using your work email address to register for social media accounts unless it is for an E4 People social media account and you have approval from Management;

- not engage in online conduct that could constitute bullying, harassment, sexual harassment, discrimination, or victimisation of colleagues, clients, or candidates, even if conducted outside work hours;
- not engage in any social media activity that may bring our business into disrepute or have a negative effect on our business.

This includes where material is posted anonymously or using an alias or pseudonym. Even if employees do not identify themselves on social media as our employee, they could still be recognised as being associated with our business. Therefore, employees must ensure that they follow these guidelines even when engaging in private social media activity. Employees should not rely on a site's security settings to guarantee privacy, as material posted in a relatively secure setting can still be copied and reproduced elsewhere.

The use of anonymous accounts, aliases, or pseudonyms will not prevent disciplinary action where an employee can be reasonably identified or where conduct breaches this policy.

### **Inappropriate Use of Social Media**

Employees must not at any time:

- access, download or transmit any kind of sexually explicit material or violent images, including graphic images of blood or gore;
- access, download or transmit information on the use or construction of weapons, explosives or other tools of violence;
- access, download or transmit any material deemed to be illegal under any state or federal law;
- access, download or transmit hate speech or racist material, racial epithets or religious bigotry;
- compromise the privacy of any person;
- disrupt the integrity of our data or information services;
- engage in film or music piracy, including by downloading or copying software or electronic files without authorisation;
- engage in unauthorised copying, digitization or distribution of photographs from magazines, books or other copyrighted sources;
- impersonate E4 People, its employees, clients, or candidates;
- use social media in a way that creates cyber security risks, including phishing, social engineering, or unauthorised access to systems or data.

### **POLICY BREACH**

Should you be in breach of this policy, you may be subject to disciplinary actions, leading up to and including termination of your employment.

### **POLICY REVIEW**

This policy will be regularly reviewed by E4 People and any necessary changes will be implemented by the Directors.