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Social Media Policy

January 27, 2020



Title: **SOCIAL MEDIA POLICY**

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Introduction:

This document outlines the Social Media Policy across Pakistan Cables Limited (“the Company”) and recognizes the growing importance to employees of Social Media (as defined in the Company’s Marketing Policy) as a source of information and as a way to interact with others. Communicating information regarding the Company through Social Media, while beneficial, can also present risks for the Company, its employees and stakeholders.

Purpose:

The Social Media Policy (i) provide guidance for business use of Social Media and (ii) assists stakeholders in making responsible decisions about the use of Social Media that may affect the of the Company.

- All employees of third party agencies, vendors, suppliers and service providers authorized by the Company and responsible for developing content and handling the Company’s social media networking sites.

1. General Rules:

The guidelines that apply offline also apply to activities online. For example, when using Social Media, observe laws on fair use, copyrights, plagiarism, and trademarks and be careful not to violate all Company policies. Relevant information can be found in the following Company policies:

- Policy on Code of Conduct;
- Policy on Code of Ethics;
- IT Governance Policy;
- Marketing Policy;
- Conflict of Interest Policy;
- Investors’ Policy;



Critical points to keep in mind with respect to this policy in terms of interaction on Social Media are as follows:

- **Be respectful.** Always be fair and courteous to fellow colleagues, customers, suppliers or other stakeholders. Never use Social Media in a manner that could be construed as harassment, bullying, or discriminatory.
- **Be honest and accurate.** All data and information that is posted on Social Media must be honest and accurate and supportable by proof or facts (if needed). Any changes to posts must be acknowledged. Data posted on the Internet may be stored much longer than expected. Deleting postings may not ensure that the data no longer exists.
- **Protect privacy rights.** The Company is subject to laws prohibiting the use or publication of the images of individuals and other personal data without their permission. Respect and protect the privacy rights of colleagues and commercial partners.
- **Respect intellectual property rights.** Do not use materials protected by intellectual property rights without the owner's permission.
- **Do not disclose Confidential Information.** Customer lists, pricing information, trade secrets and financial information that PCL has not already officially released into the public domain must not be disclosed. As the Company is a public limited company, everyone must adhere to the prevailing confidentiality and non-disclosure requirements of the Central Depository Company, the Pakistan Stock Exchange and the Securities and Exchange Commission of Pakistan.
- **Report objectionable/negative posts/complaints.** In case there are negative posts about the Company or its brands, or third parties trying to spark negative conversations or defame the Company, the temptation to react must be avoided. The post(s) must be passed along to the Marketing and Brands team at: brands@pakistancables.com
- **Ensure others know that your personal account or statements do not represent the Company.** You should not state or imply that your personal opinions and content are authorized or endorsed by the Company.

02 Business Use of Social Media:

Some functions, such as Human Resources & Administration, Marketing & Brands, Sales, may have good business reasons to use Social Media in certain circumstances. For example, Marketing uses Facebook and other social media platforms for advertising and publicity. All employees of the Company, employees of third-party agencies, vendors and service providers responsible for handling the Company's social media websites are expected to act responsibly to protect the Company's image and reputation. All employees must:

- **Avoid speaking on matters outside their field of expertise.** Everyone should be careful not to answer questions or make statements on Social Media for which they do not have a complete understanding.
- **The Marketing & Brands department is authorized to create social media accounts and post content on social media on behalf of the Company** e.g. advertisements, promotions, announcements, job postings and so on.
- **No employee or department shall have the authority to post any content on social media on behalf of the Company.** All departments must route their Social Media postings through the Marketing & Brands department with at least three (03) working days reaction time to meet posting deadlines.
- **Never post discriminatory, offensive or libelous** content and commentary.
- **Correct or remove** remove any misleading or false content as quickly as possible and inform the Marketing & Brands team at brands@pakistancables.com.

The risks related to Social Media require careful review before each business use of Social Media. Therefore, you should use Social Media for business purposes only if the activity is explicitly approved by the Head of Marketing & Brands or in specific rules adopted by the head of respective function.

3. Private Use of Social Media:

The Company allows restricted access/use of Social Media on the Company's Computer Systems. Exceptions are made only in case of business needs. Use of social media on the Company's computer systems is permissible provided it is for a business need; it is consistent with the following guidelines and does not interfere with your employment responsibilities or productivity.



All employees are responsible for what they post online. While the Company has no intention to impede or intrude into employees' private use of Social Media, in some cases the private use of Social Media may affect the Company. Therefore keep the following in mind when engaging in private use of Social Media, whether using a Company or private computer, phone, or other device:

- **Employees are expected to comply with the Social Media policy when engaged in all social media, including professional social networking sites such as LinkedIn.** Content disseminated and posted while using Social Media for personal/private use can expose the Company to being associated with inappropriate posts that may damage reputations or lead to claims of defamation, discrimination, harassment or bullying.
- **Do not assume your postings will remain anonymous.** Assume "private" discussions can easily become public and that your personal comments can be misconstrued as Company statements.
- **Do not use the Company provided email address to register on Social Media for private use.** Express only your personal opinions. Never claim or imply that you communicate on behalf of the Company.
- **Do not contribute to industry-related interest groups, such as forums where industry-related policy, pricing issues are debated without prior written consent from Marketing & Brands department.** Any comments posted by employees to defend or clarify a Company position could be misinterpreted, mistakenly attributed to the Company or taken out of context in ways that could damage the Company.
- **Avoid providing endorsements and other employment-related positive or negative comments about current or former employees or suppliers on Social Media.** They may be viewed as an endorsement or an unwarranted harmful criticism by the Company, and the Company could be held responsible for the views you express. If you choose to provide such comments, make it clear that they represent your personal opinion and not that of the Company.



Definitions

Company Information - information, in any form or medium (whether electronic or hardcopy) that is in the Company's possession, custody or control and relates to the Company's business activities.

Computer System - any computer hardware (including personal computers, mobile phones and tablet computers), software and related services that the Company (directly or through third parties) operates and provides for: sending and receiving communications (such as electronic files and messages) on Company matters; or storing, accessing, and otherwise processing electronic Company Information, and Supporting Systems such as e-mail and other communication and collaboration tools.

Confidential Information - non-public information that the Company has in its possession, custody or control and that the Company does not wish to make public. For example: Budgets and other non-public financial information; Marketing strategies; Personnel records; and Research and technical data. Legal Hold - a designation used for Company Information that must be preserved for litigation, audits and investigations.

Social Media - all means of posting information or content of any sort on the Internet for broad access, such as your own or someone else's blog, journal or diary, personal web site, social networking website, web bulletin board or a chat room (e.g., Facebook, Google+, Twitter, LinkedIn, Instagram, Snap Chat, WhatsApp, Chat-bots).

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