

## Social Media Usage

### Directive

Scope	Units	Marketing/Communications
	Countries	NO; AT; CH; FR; RO; SE
	Germany	Mandatory approval of the works council (Betriebsrat) is pending
Process Owner		Silvan Merki, Chief Commercial Officer (CCO)

Directive

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## 1 Summary

This directive provides clear principles of conduct in the handling and use of social media. This policy is binding for all employees in all entities within the Implenla Group.

## 2 Purpose/Goals

The purpose of this directive is to provide all employees with rules/principles of conduct in their personal use of social media platforms, whenever representing Implenla, stating Implenla as employer or sharing or referring to Implenla related content. Thereby the term "social media platforms" includes blogs, wikis, chat rooms, online forums, widely known social networking platforms such as **LinkedIn, Facebook, Instagram, Twitter, YouTube, Xing, TikTok, etc.**, and other platforms and services that permit users to share information, internally & externally.

## 3 Context/Scope

With this directive, we want to make you aware of legal risks so that you can avoid them in order to protect yourself and, at the same time, Implenla. Furthermore, we want to highlight how you can contribute as an employee to our social media presence and thereby help us communicate more effectively to external audiences.

For the following instructions, it does not matter whether you use social media with your private devices or with the devices provided by Implenla. The instructions regarding the use of social media platforms equally apply to private activities when related to Implenla as well as to activities for Implenla.

## 4 Rules/Principles

### 4.1 General principles

The applicable laws, rules and widely accepted social norms, also stated in the prevailing "Code of Conduct" guidelines, must be adhered to on social media platforms, too. Insults, name-calling, provocations, damage to reputation, racism and discrimination have no place there. Therefore, before publishing a contribution, consider whether you can still defend your post in retrospect. Always ask yourself whether you would communicate the content directly to a journalist, a work colleague, a supervisor, a business partner or any other relevant stakeholder. This also applies to sharing, commenting or liking third-party content.

### 4.2 Other important rules/principles

1. Keep Implenla's values in mind at all times. They apply to our conduct at work just as they do as a private person.
2. Speak only for yourself. Official communications and publications from Implenla will only be issued by authorized employees.
3. Be authentic and transparent. Make clear that your opinion is your own and not that of Implenla.
4. Act responsibly. Think of the effect your post/comment could have on Implenla's reputation.
5. Respond to criticism calmly and do not respond in the heat of the moment.
6. Protect your privacy. Postings on social media are visible to everyone and leave traces on the web.
- 7. Support Implenla. Share, comment or like official content on social media at your own discretion.**
8. Contact the Marketing/Communications team if you need help with an unfamiliar or difficult situation regarding social media.

#### 4.3 Statements in the private sphere

Even in the private sphere, you must not impair the interests of Implenia as your employer. Therefore, conduct any activity in social media in your own name and not as an official voice of our company ("speak for yourself"). Personal statements or posts on social media should be clearly recognizable as such, i.e. use "I" instead of "we". It is of course not forbidden to publish pictures or texts from your private sphere, but please make sure that you do not create a recognizable context to Implenia.

#### 4.4 Statements on behalf of Implenia

You may only make public statements on behalf of Implenia if you have been authorized to do so. Official statements on social media are generally the sole responsibility of the mandated persons of the Marketing/Communications team and specially authorized employees. In any case, if you make statements related to Implenia (e.g. your project), they must of course be true. If you have any doubts about the content you want to publish, contact the Marketing/Communications team.

#### 4.5 Creation and management of Implenia accounts

You may only create and manage Implenia accounts if you have been authorized to do so. It is generally the sole responsibility of the Marketing/Communications team and specially authorized employees to do so. Please refrain from creating fan pages, project pages, unit pages, division pages, company pages, etc. related to Implenia without prior consent of the Marketing/Communications team.

#### 4.6 Copyright and trademark rights

Texts, photos, drawings (including drafts) and film material are usually protected by copyright. Use is therefore generally only permitted with the prior consent of the copyright holder. Without their consent, such content cannot be published via social media. In any case, when using third-party content, always disclose the author and/or the source or link to the source. The use of logos, company names or product designations is also often only possible with the prior consent of the rights holder. This also applies to content and visuals by Implenia, which are protected by trademark law.

#### 4.7 Right to one's own image

Images of other persons (employees and external persons) may not be published without their prior consent. Publication without consent does not automatically infringe Implenia's rights, but it does violate the rights of the person(s) depicted. Therefore, make sure to obtain any necessary consents for publications in advance.

#### 4.8 CI/CD Guidelines

All visuals (incl. pictures, videos, GIFs, etc.) about Implenia need to be compliant with Implenia's prevailing CI/CD guidelines and approved by Marketing/Communications prior to publication on social media platforms - also if published through your personal accounts. This way, we ensure a consistent reputation and brand identity on all social media platforms.

#### 4.9 Safety regulations

Always keep in mind that for all content published on social media the prevailing safety rules of Implenia must be adhered to at all times.

#### 4.10 Confidentiality

At any time, you must keep Implenia's trade and business secrets confidential. This also applies for social media. Internal company information and business secrets may not be published, passed on or stored. The only information that does not have to be kept secret is information that has already been published externally through an official Implenia channel.

#### 4.11 Data security

The security of personal data not only ensures that Implenia complies with applicable data protection law, but also protects our interests. Company and business secrets must be protected from unauthorized access by third parties. This becomes critical if third parties make use of your profiles and pretend to be you. Therefore, you should always use secure passwords (also for all your social media accounts) in accordance with our IT instructions and change your passwords regularly. If you have any questions, please contact our data protection officers at Implenia.

#### 4.12 Violations of the rules/regulations

You should know that the obligations underlying the rules/regulations do not automatically end when we part ways. Even after termination of an employment relationship, fidelity and confidentiality obligations may continue to apply, and you may therefore still be in breach of them.

If a violation of the rules stated in this social media directive occurs, the Marketing/Communications team together with the Legal team, will (except in cases of obvious and serious violations of the law) first seek a discussion with you. If it happens again, we will issue a warning or, in serious cases, an official dismissal.

### **5 Employee Engagement**

Our official social media accounts live with the content provided by our employees. Therefore, we very much encourage you to share suitable content from your Divisions and Functions with your assigned Business Partner within the Marketing/Communications team. The social media specialists within the Marketing/Communications team will then consult and support you.

### **6 Version History**

Date	Version	Comment	Approved by
09.06.2021	1.0	Initial release	Silvan Merki

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