

The Martin Group of Companies

Incorporating:

H W Martin Holdings Limited

H W Martin Fencing and Forestry Limited

H W Martin (Traffic Management) Limited

H W Martin Safety Fencing Limited

H W Martin Fleet Maintenance Limited

H W Martin Waste Limited

Amber Langis

Premier Waste Recycling Limited

Lochrin Bain Limited

King Vehicle Engineering Limited

King Trailers Limited

King Transport Equipment Limited

King Highway Products Limited

Safety Vehicle Hire and Lease Limited

Virtus Traffic Management Solutions Limited

Group Social Media Policy

Document History

Written by	Sarah Robson	
Authorised by	Gavin Peace	

Review Date	Reviewed By		Comments / Amendments	Version
25 June 2025	Sarah Robson		Interim review further to C-Suite / SLT changes. Reviewer and authorisation change.	1.8
30 April 2025	Gavin Peace		Annual Review. Update on Social Media sites	1.7
01 August 2024	Gavin Peace		Interim review to reflect name change to HW Martin Fleet Maintenance Ltd, formerly HW Martin Plant Ltd.	1.6
30 April 2024	Gavin Peace		Annual Review. Policy re-write to provide clarity on expectations in an evolving social media environment.	1.5
26 February 2024	Gavin Peace		Interim review to reflect authorization name change.	1.4
30 April 2023	Gavin Peace		Annual Review. Virtus Traffic Management Solutions Limited added. Tik Tok added to list of social media examples	1.3
30 April 2022	Iain Kay		Annual review. No changes.	1.2
30 April 2021	Iain Kay		Annual review. No content changes. New logo added.	1.1
30 April 2020	Iain Kay		Annual review and change to document reference in line with MSV 03-1-3 Procedure for Documented Information	1.0

The Martin Group of Companies (“the Group”) accepts that many employees will be involved in social networking, using services such as (but not limited to) Facebook, LinkedIn, X (formerly Twitter), Wikipedia, Instagram, WhatsApp, Tik Tok, YouTube to conduct their social lives online. The Company recognises that employees have a right to a personal life outside of work and respect this.

Employees must recognise, however, that the Company may have concerns about the way in which employees conduct their personal lives if their actions cause, or could potentially cause, any detriment to the Company.

Employees should be aware that any breach of confidentiality or any action which brings the Company into disrepute may be deemed to be gross misconduct, rendering employees liable to summary dismissal. This applies equally to misconduct carried out online as well as offline.

This policy has been designed, therefore, to clarify to employees what the Company expects of them regarding their use of social networking sites in their personal lives.

1. Scope

This policy applies to all employees, agency staff, secondees, contractors, non-executives, and other workers of the Group.

2. Purpose

- 2.1 This policy is in place to promote responsible usage of social media whilst minimising the risks to our business through inappropriate use of social media; inform staff of their obligations with regard to the use of social media; and to enhance the continuing development of the Group through insight and intelligence gleaned through social media channels.
- 2.2 This policy deals with the use of all forms of social media, such as (but not limited to) Facebook, LinkedIn, Twitter, Wikipedia, Whisper, Instagram, WhatsApp, Tik Tok, YouTube and all other social networking sites, internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may affect our business in any way.
- 2.3 This policy does not form part of any employee's contract of employment and may be amended at any time and any changes will be communicated to staff prior to becoming effective.
- 2.4 The purpose of this policy is to inform staff of their obligations with regard to their own use of social media. If any member of staff is subject to harassment or derogatory comments via social media, they should bring this to the attention of their line manager or a more senior manager, or the Human Resources department as appropriate.
- 2.5 Should we come across a derogatory social media post that refers to an employee by name, we will discuss / investigate the post with the affected employee.

3. Roles and responsibilities

- 3.1 Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks lies with Human Resources who will review this policy periodically to ensure that it meets legal requirements, draws upon best practice, and reflects developments in social media use and technology.

- 3.2 Managers have responsibilities for the effective implementation of this policy. This includes ensuring that their team members are given the opportunity to read and understand the policy and are aware of the standards of behaviour expected. Managers are not expected to monitor social media use from their team members but are expected to take action when they are made aware of behaviour which falls below the level required.
- 3.3 All staff are responsible for the success of this policy and should ensure that they take the time to read and understand it, adhere to the requirements described and ensure that their use of social media involving reference to the Group does not damage the reputation of the Group.
- 3.4 Any misuse of social media should be reported to the relevant member of staff's line manager and in turn to the Human Resources department. Questions regarding the content or application of this policy should be directed to Human Resources.

4. Personal Use of Social Media

- 4.1 Unreasonable use of social media for personal matters is not permitted during working hours or by means of the Company's computers, devices, networks and other IT resources and communications systems. This could potentially lead to disciplinary action.
- 4.2 It is recognised that you may wish to monitor social media channels for work purposes via a personal account, for example following the Twitter feeds or LinkedIn postings of the company's businesses or relevant stakeholders. This can provide the organisation with useful insight into how we are perceived and how we can develop our businesses.
- 4.3 Such monitoring must be relevant to your work and must not negatively impact on the time you spend on your core duties or be a mask for personal use of social media in work time.
- 4.4 For social media sites or applications which are solely work or professionally based, such as LinkedIn or professional networking forums, you are permitted to state that you work at the Martin Group of Companies, or the specific business with which you are employed, and the capacity of your employment but before doing so, you should consider if this is relevant or necessary.

5. Prohibited Use

- 5.1 You must not make any social media communications that could damage our business interests or reputation, whether directly or indirectly.
- 5.2 You must not use social media to defame or disparage the Group, our staff or any third party; to harass, bully or unlawfully discriminate against staff or any third parties; to make false or misleading statements; to directly or indirectly make derogatory comments or use offensive or inappropriate language in any social media communication; or to impersonate colleagues or third parties.
- 5.3 You must not express opinions or provide advice on behalf of the Group via social media, unless expressly authorised to do so by a Director.

- 5.4 You should note that if you provide advice on social media in a personal capacity on matters which relate to the Group, it is often easy for you to be identified as connected to the Group. Therefore, your advice may be interpreted as reflecting an official Group line. You should therefore avoid exposing yourself to a situation where your advice or views could potentially be interpreted as those of the Group. Speak to your manager as soon as possible if you think that there is a risk that this may have occurred.
- 5.5 You must not post comments about sensitive business-related topics, such as our current business opportunities or performance, or do anything to jeopardise confidential information and intellectual property. You must not include our logos or other trademarks in any social media posting or in your profile on any social media without the prior receiving express permission from a Director.
- 5.6 You are reminded of your duty of confidentiality to the Group and the requirements of s.132 of the Data Protection Act with regard to inappropriate disclosure of information. This duty continues after you leave the Group's employment. You are also reminded of your contractual obligation not to undertake any activity which may embarrass the public image of the Group.
- 5.7 Any misuse of social media should be reported to the relevant member of staff's line manager and in turn to the Human Resources department and may result in disciplinary action in accordance with the Group's disciplinary policy. Disciplinary sanctions will be as described in the disciplinary policy, up to and including dismissal, depending on the nature of the misconduct identified. Examples of what may be regarded as gross misconduct include (but are not limited to): posting derogatory or offensive comments about the Group, colleagues, or customers; the deliberate or negligent disclosure of information about the Group's activity; and the posting of comments which may cause harm to the reputation of the Group.

6. Business Use of Social Media

- 6.1 If your duties require you to speak on behalf of the organisation in a social media environment, you must still seek approval for such communication from your manager. Your manager may impose certain requirements and restrictions with regard to your activities.
- 6.2 Likewise, if you are contacted for comments about the organisation for publication anywhere, including in any social media outlet, direct the enquiry to a company director, and do not respond without receiving written approval first.

7. Guidelines for Responsible Use of Social Media

- 7.1 When making personal use of social media, (i.e. you are not posting in your capacity as a Group employee) you must not imply that you are posting on behalf of the Group. Write in the first person and use a personal email address.
- 7.2 Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see. On personal social networks and messaging services– even closed ones like Facebook and WhatsApp – you should be aware that posts can be shared outside of your network. If you make a posting which could bring the organisation into disrepute, then you could be subject to disciplinary action.

- 7.3 If you disclose your affiliation with us on your business based social media profile or in any social media postings, you must state that your views do not represent those of your employer (unless you are authorised to speak on our behalf as set out in section 6). You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.
- 7.4 You should be aware that it is possible for social media users to connect the work you do for the Group with other social media postings. The likelihood of this is increased if you declare on business based social media that you work at for the Martin Group of Companies. It is therefore important to remember that when posting in a personal capacity you may still easily be identified by other users as working for the Group even if you don't state it.
- 7.5 If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your manager.
- 7.6 The privacy settings on social media apps and websites should give you control over how your personal information is used. All staff who use social media are advised to check their privacy settings before using a particular service and to review them regularly, particularly after any new settings are introduced.

8. References

- 8.1 Staff should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the organisation and create legal liability for both the author of the reference and the organisation.

9. Monitoring

- 9.1 We reserve the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems including but not limited to social media postings and activities. This may be done for legitimate business purposes, which include ascertaining and demonstrating that expected standards are being met by those using the systems and for the detection and investigation of unauthorised use of the systems (including where this is necessary to prevent or detect crime).

10. Breach of this Policy

- 10.1 As stated in Section 5, breach of this policy may result in disciplinary action up to and including dismissal. All breaches will be investigated in accordance with the Group's Disciplinary Policy and Procedure and the level of disciplinary action to be taken, if any, will be a matter of judgement for the chair of the disciplinary hearing.
- 10.2 You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

11. Frequently Asked Questions

11.1 Can I declare on social media that I work for the Martin Group of Companies or Companies which they operate?

Yes, if it is a professional based social media platform, but ensure you reflect a professional view of yourself and the organisation in all your postings. You should be aware of the ability of people to connect your work role to other social media which you use on a personal basis. However, there is unlikely to be a need for you to say you work at the Group on personal social networking sites.

11.2 What happens if I make a mistake when using social media?

How the Group deals with particular mistakes will depend on the nature of the error and the connection to your work. You should always inform your line manager and Human Resources if you are at all unsure whether you have made a mistake on social media that may affect the Group or its business and reputation. Your conduct online is subject to the same disciplinary rules and the expectations of the staff code of conduct as your offline conduct.

However, steps you could take are:

- Delete the post and apologise for the mistake, explaining the material was posted by mistake.
- Inform your line manager and Human Resources for advice.

11.3 Will the Group actively search social media for information posted by members of staff on their personal accounts?

No, unless information has been received that would require further investigation because it breaches our rules or standards of conduct.

11.4 Does this mean that I can't post reviews, even positive ones, about working for the Group on sites like Glassdoor?

No, that's not the case. It is recognised that staff may want to make full use of opportunities offered by social media, and social media can be used to benefit the Group. However, it is important that employees protect the privacy, confidentiality, and interests of the Group, our services and our staff. As with any form of communication, if in doubt, seek advice or do not post at all.

11.5 What should I do if a colleague is sending me unwanted messages or posting disparaging messages about me on non-work-related social media pages?

Any member of staff who feels that they have been harassed or bullied or are offended by material posted or uploaded by a colleague onto a social media website should inform their line manager who will then discuss the issue with HR. Support and advice is available from resources such as HR and The Employee Assistance Programme.

11.6 Why is the Group concerned about things I might post on social media in a personal capacity?

Boundaries between working life and private life can become blurred when using social media and as such employee's actions and posts have the ability to affect our brand and reputation. It is important that employees are aware of the impact their posts could have on the Group and should therefore use social media responsibly.

11.7 Are messages received via WhatsApp, Messenger and similar applications covered by this policy?

In principle all forms of social media and digital communication are covered by this policy. This includes WhatsApp, Messenger, email etc. and indeed any new forms of social media or digital communication that may be introduced or become popular in the future.

It is correct that in these instances only the sender and receiver(s) can see the content. However, the content can in principle be widely distributed if it is transferred into other social media platforms. The fact that the content may be private, would not excuse otherwise unacceptable or inappropriate behaviour such as the sharing of derogatory or discriminatory comments, videos, pictures, or other media about colleagues or third parties.



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