









COMMUNICATION AND SOCIAL NETWORKING POLICY

Global Rail Construction Limited consider communication via media and the widespread use of social networking applications an effective and useful method for communication in the appropriate context, the company recognize that the potential for misinterpretation of the business and misuse by workers, during and out of work hours, is such that the following guidelines are in place.

This communication and social networking policy has the following purpose:

- To help protect Global Rail Construction Limited against potential liability;
- To give workers clear guidance on what can and cannot be said about the organisation or other workers;
- To help line managers effectively manage employee performance, time management and use of the organisation's resources;
- To help workers separate their professional and personal communication;
- To comply with the law on discrimination, data protection [GDPR] and protecting the health of workers;
- To be clear about the use of monitoring within the organisation.

If an employee is approached by a media organisation (all external media including broadcast, electronic and print) the individual should refer to this company policy and direct the organisation to the principal media contact and company spokesperson in the senior management team.

Access to email and the Internet is provided during working hours for the purpose of effectively completing work and use must comply with all organisation policies and procedures.

Global Rail Construction will not tolerate workers using social networking sites including instant messaging for unofficial or inappropriate uses, specifically:

- You should not use such sites during contracted working hours for personal interest/benefit, without the authority of an appropriate manager. Usage during your agreed breaks is permitted, subject to the rules contained in this policy;
- You should not at any time upload photographs to your social networking sites of yourself or any other employee taken
 in a work situation or in a work uniform;
- No defamatory comments about the organisation should be made on such sites at any time;
- You should not at any time include information that identifies any other employee/ contractor/ supplier/ client/ customer
 or any other individual working in connection with us;
- You should not at any time express opinions on such sites which purport to be the opinion of the organisation, nor comments representing your own views on our organisation;
- Any personal blogs should contain a disclaimer that the views expressed on it are personal views of the author only;
- You should not at any time make comments on such sites which bring the organisation into disrepute;
- You should not at any time make comments on such sites which amount to bullying, harassment or any other detriment towards other workers/contractors/suppliers/clients/customers or any other individual working in connection with ourselves.

The term "use" includes accessing social media by means of PC, mobile phone, tablet or by any other device.

It is recommended that all workers use strict privacy settings on their social network profiles.

The organisation monitors your internet usage regularly and may undertake more in depth monitoring where considered necessary. This includes monitoring the websites you visit and any other matters referred to in this policy.

Any workers who we suspect have breached this policy will be subject to the organisation's disciplinary procedure.

If an employee is aware of any defamatory comments made about the organisation on social media by a third party either directly or indirectly such as those specifically identified within the policy, the company recommend that the employee bring this to the attention of the management team.

It is the responsibility of everyone in the business to comply with this policy and its associated arrangements as an integral part of their day to day business.

The policy will be reviewed annually, as a minimum by the Directors in consultation with the Head of Compliance and amended as required by law should new legislation come into force or to ensure it remains relevant and appropriate to the organisation. This has been endorsed by the Management team at Global Rail Construction Limited who take direct responsibility for its execution.

Signed on the 18th June 2019 for and on behalf of Global Rail Construction Limited.

Signed:

M G Lombardelli Managing Director Signed:

P. Coleman

Head of Compliance

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