

# Brambles

## **Social Media Policy**

**Brambles Limited**

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Version 2.0

# SOCIAL MEDIA POLICY

## Policy overview

Brambles recognises that social media is an effective tool for sharing information and opinions with family, friends, and communities around the world, and that it is increasingly a facilitator of corporate and business engagement. However, the use of social media also presents certain risks and carries with it certain responsibilities. To guide employees in making responsible decisions about their use of social media, Brambles has established this policy. It is designed to protect the interests of the company, its employees and its customers and suppliers, to ensure that any references to Brambles or its subsidiary companies do not breach confidentiality requirements, and to otherwise ensure compliance with Brambles' Code of Conduct and its Continuous Disclosure & Communications Policy.

The Brambles Group Social Media Policy applies to all employees who work for Brambles or one of its subsidiary companies.

## What is social media?

Social media includes all means of communicating or posting information or content of any sort on the Internet and all forms of social computing. Social media platforms take on many different forms, including, but by no means limited to, your or someone else's blogs or microblogs (e.g. Twitter, Tumblr), content communities (e.g. YouTube), social and professional networking sites (e.g. Facebook, LinkedIn), forums and discussion boards (e.g. Whirlpool, Google Groups), online encyclopedias (e.g. Wikipedia) and virtual game and social worlds (e.g. World of Warcraft, Second Life).

The application of social media is growing and evolving rapidly. This policy also covers future applications of social media in whatever form they may take.

## Why has Brambles developed a social media policy?

As a publicly-listed company, Brambles - and by extension, its employees - must maintain certain standards when it comes to what and how it communicates, both internally and externally. The same principles and guidelines found in Brambles' policies, including the Code of Conduct and the Zero Harm Charter, apply to online activities, including those relating to social media. Ultimately, each individual is solely responsible for what he or she posts online. Before creating online content, it is necessary to consider the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of co-workers, or adversely affects customers, suppliers, or people who work on behalf of Brambles or subsidiary companies may result in disciplinary action up to and including termination. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct, or which divulge confidential information of Brambles, its customers or suppliers and work-related matters of its employees will not be tolerated.

## What happens if someone breaches the terms of this policy?

Failure to comply with this policy could result in disciplinary action against an employee or employees, up to and including termination of employment. It may also result in legal action being taken by third parties against the company or one or more of its employees. You may e-mail any questions or comments to [socialmedia@brambles.com](mailto:socialmedia@brambles.com).

### GUIDING PRINCIPLES

**Be respectful** - Be fair and courteous to your co-workers, customers, suppliers, and people who work on behalf of Brambles or its subsidiary companies. Avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening, or intimidating, that disparage co-workers, customers or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, color, nationality or national origin, class, religion, age, disability, marital status, sexual orientation or gender identification, political opinion, or any other status protected by applicable law. **If it's online, it's publicly available** - Remember that co-workers, customers, and suppliers often have access to the online content that you post. As a matter of best practice, Brambles recommends employees set privacy settings for personal social media pages or sites at the highest level of security.

**Maintain confidentiality** - Maintain the confidentiality of Brambles' and its subsidiary companies' trade secrets and private information and the confidential information of its customers or suppliers. Trade secrets and private information may include information regarding the development of processes, products, services, know-how and technology, and financial results. Do not post pricing, financial or operational information, internal reports, policies, procedures or other internal business-related confidential communications, including business travel or appointments, which is not otherwise in the public domain. Also, do not post any customers' or suppliers' confidential information that is not public knowledge.

**Respect financial disclosure laws** - It is illegal to communicate or give a "tip" on inside information to others so that they may buy or sell stocks or securities, including via social media. Such conduct will also violate Brambles' Securities Trading Policy or Continuous Disclosure and Communications Policy.

**Be transparent** - Identify yourself as an employee any time you create a link from your blog, website or other social networking site to a Brambles (or subsidiary company) website. If Brambles (or one of its subsidiary companies) is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of Brambles or its subsidiary companies, or their employees, customers, suppliers, or people working on their behalf. Should you publish a blog or post content online related to the work you or Brambles (or its subsidiary companies) do, it is best to include a disclaimer, such as "The postings on this site are my own and do not necessarily reflect the views of Brambles or its subsidiary companies."

**Only authorised spokespersons can act on behalf of the company** - Brambles' Continuous Disclosure and Communications Policy identifies those employees authorised to speak to the media, analysts and shareholders on Brambles' behalf. This policy applies to all company communications, including those made using social media. Unless you are authorised by Brambles' Continuous Disclosure and Communications Policy to speak on Brambles' behalf, you should not represent yourself as a spokesperson for the company.

**You act as an individual** - You are personally responsible for the privacy and related security risks for all of your posts and other communications using social media.

**There's really no such thing as "delete" on the Internet** - Make sure you are honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything. Therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about Brambles or its subsidiary companies, or their employees, customers, suppliers, or competitors.

**Using social media at work** - Refrain from using social media while on your work time or on equipment we provide, unless it is work-related as authorised by your manager or consistent with Company policies. Do not use company email addresses to register on social networks, blogs or other online tools utilized for personal use.

**No retaliation** - Brambles prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

The following is a suggested list of "Dos" and "Don'ts" that should be read in conjunction with the policy above. These "Dos" and "Don'ts," along with the policy above, will be administered in compliance with all applicable laws and regulations.

### DO

- ✓ Protect company trade secret and private information, as described above, and confidential information belonging to customers and suppliers. If you have access to such information, ensure it is not posted on any social media site.
- ✓ Always be transparent and disclose that you are an employee if you are posting about the work you do or the products and services Brambles (or its subsidiary companies) provides.
- ✓ Remember that anything posted via social media can go viral, no matter what your privacy settings may be.
- ✓ Admit mistakes. If you realise that you have violated this policy, let your manager know as soon as possible.
- ✓ Be lawful and abide by Brambles policies.

### DON'T

- ✗ Use social media to bully, harass, or discriminate against anyone, including work colleagues, customers, suppliers or other stakeholders.
- ✗ Post defamatory content about Brambles' or its subsidiary companies' products and services, or post defamatory content about customers, suppliers, or competitors.
- ✗ Post pictures of Brambles' logos, trademarks, or other assets in posts concerning the company's products and services, unless authorised by Brambles.
- ✗ Respond to a negative or offensive post about Brambles' products and services by any third party, including customers, suppliers or competitors. Employees should refer all such situations to their local leadership or communications team, who will respond in line with the Continuous Disclosure and Communications Policy.

- ✓ We suggest maintaining an appropriate level of security on your personal social media pages.