

1. Purpose of Policy

This policy is intended to promote the effective use of social media throughout John Graham Construction Ltd. (“GRAHAM”), protect the organisation and help you make appropriate decisions about your use of social media.

Social media should be used by applying sound judgement and common sense. It is important that employees are aware of the guidelines around its use and how its use can impact the GRAHAM brand and business activities.

GRAHAM are committed to being an inclusive workplace where all employees, customers and stakeholders can fully participate and contribute. We strive to ensure accessibility across all facets of our operations, including physical spaces, digital platforms, communication channels and services.

Our People policies are regularly audited against rigorous accessibility standards to ensure compliance and to support every employee.

Anyone who requires additional support or has any questions regarding accessibility can contact the HR team at HR-JGC@graham.co.uk

2. Scope

All company employees and temporary staff, contractors and partners are required to read and follow this policy confirming their understanding and acceptance.

Non-compliance with this social media policy may result in disciplinary action up to and including summary dismissal, and by supply chain employees, contractors, agents or other third parties working on our behalf, in termination of contract.

Employees, supply chain employees, contractors, agents or other third parties working on our behalf must remove any offending content immediately from their personal profiles, if they are asked to do so, by the Marketing and Communications team.

3. Definition of Social Media

Social media is the collective term for websites, apps and other electronic platforms that allow you to create and share content and participate in social networking. This includes popular forums such as Facebook, TikTok, Twitter, Instagram, LinkedIn, YouTube and all other social networking sites as well as blogs and any other content-sharing platforms. Social media is constantly evolving with new platforms being launched continuously and therefore this list is by no means exhaustive.

3.1. Use of Social Media

The principles of this policy apply to the use of social media in connection with, or in a manner, which reflects upon your role within GRAHAM, regardless of the method used to access it - it covers both personal and work equipment including but not limited to static and mobile devices such as laptops, iPads and smartphones.

Individuals should have no expectation of privacy in any social media post, conversation or message. This includes those transmitted to, received or printed

from, or stored or recorded, on our electronic information and communication systems.

GRAHAM recognises that some employees/ partners etc. will want to share positive, helpful and interesting communications about GRAHAM and its work online to benefit the brand. Any communications that users make through social media, whether in a professional or personal capacity, **must not**:

- Express opinion on behalf of the business as a GRAHAM spokesperson unless the communication has been agreed in advance with the Marketing and Communications team;
- Post any image on behalf of the business as a GRAHAM spokesperson unless you are a designated user and the communication has been co-ordinated and agreed with the Marketing and Communications team. This is to ensure we do not breach any non-disclosure agreements with our clients or pre-empt any strategically agreed and scheduled communications;
- Express:
 - Negative views about GRAHAM or any of our Clients, Competitors or any other Stakeholder;
 - Personal views in a way which might be interpreted as GRAHAM view;
- Post, Share or Like content/ images that may:
 - damage the company's reputation or business activities;
 - be untrue or misleading;
 - discriminate against, or bully or harass, any individual, for example, making offensive or derogatory comments relating to gender, disability, nationality, ethnicity or national origin, sexual orientation, religion or belief, marital status or civil partner status, age and pregnancy and maternity;
 - be inappropriate and bring GRAHAM into disrepute;
 - contain confidential information on the business, its partners or individual employees;
 - embarrass our stakeholders or damage our relationship with them;
 - use the GRAHAM brand or logo in any personal social media posting unless you are a designated user.

This list is non-exhaustive, it is intended to provide only indicative examples of improper use on social media and may be added to or amended at any time.

Provided the terms of this policy are adhered to, reasonable personal use of social media is permitted during designated breaks using both personal and GRAHAM IT computers, networks and other IT resources and communications systems. Outside work hours, reasonable personal use of social media is permitted using GRAHAM IT computers, networks and other IT resources.

If employees are uncertain about the suitability of any social media post, they should refrain from posting it until they have discussed it with the Marketing and Communications team.

Remember, electronic communications are legally admissible in court.

3.2. Use Your Best Judgement

Please remember to always use good judgment and common sense in deciding what you publish online, particularly where it will or may reflect upon either GRAHAM or you and your role within the business. If you are about to publish something which causes a doubt in your mind then you should review this policy in the first instance. If you're still unsure, you should discuss it with your manager or a member of the Marketing and Communications team.

Ultimately, you have sole responsibility for what you post on social media, in a blog or website.

You should ensure that your online activities do not interfere with performing your job responsibilities to the best of your ability.

4. External Communications

GRAHAM pays careful attention to how communication happens across all media channels. As a GRAHAM employee, subcontractor or partner, you are expected to respect the organisation, its values and your colleagues at all times.

GRAHAM invests considerable time and effort into developing a positive reputation in the industry as well as with media and journalists. If any employee, subcontractor or partner of GRAHAM is approached by a blogger, journalist or media representative for opinion, comment or information, this request must be forwarded to the GRAHAM Marketing and Communications Team immediately.

Employees, subcontractors and partners to GRAHAM are not permitted to reveal any confidential, commercially sensitive or embargoed information which has not been released publicly by the GRAHAM Marketing and Communications team.

All GRAHAM employees, subcontractors and partners are expected to respect copyright, fair use and financial disclosure laws.

Do not cite or reference clients, partners or suppliers on business-related matters without their prior approval. When you do make a reference, link back to the source. Do not publish content that might allow inferences to be drawn which could damage a client relationship with GRAHAM. If you are unsure about the content of any post, contact the Marketing and Communications team.

Only those officially designated within or by the Marketing and Communications team may use any GRAHAM social media accounts to communicate on behalf of GRAHAM.

5. Identification as a GRAHAM employee

As a GRAHAM employee, subcontractor or partner, any online communication including that on personal and professional social media profiles is expected to represent each individual and GRAHAM in a positive manner. If GRAHAM is identifiable as your employer on any social media channel the individual must explicitly state on that profile 'The postings on this site are my own and do not represent the opinions of my employer'.

Even if you do not explicitly list GRAHAM as your employer, it may be identifiable that you are a GRAHAM employee and as such you are representing the organisation online.

You are personally responsible for what you communicate on social media. It should not be assumed that social media posts will remain private. Any information posted

on social media, even if it is on a private page, posted outside working time and/or on a private device, may still lead to disciplinary action if it is found to breach this policy.

6. How to use GRAHAM Social Media

If you wish to share information about GRAHAM and its work online, it is expected that you will follow this policy.

To share information about GRAHAM on social media, please reference the dedicated GRAHAM social media profiles and like/ share the posts from these profiles within your own network.

If you have suitable information regarding GRAHAM for use on social media, you are expected to contact the Marketing and Communications team by emailing the content to marcoms@graham.co.uk for sharing on the GRAHAM social media channels. By following this process, the Marketing and Communications team can develop imagery assets to accompany the post, connect with suitable industry partners to create a positive brand story and schedule that item for the most suitable time.

If you wish to share content and photos about GRAHAM on your personal social media accounts, please contact the Marketing and Communications team at marcoms@graham.co.uk who will discuss the applicability of you becoming a designated user.

7. Social Media Misuse

Employees, subcontractors and partners are expected to highlight to the Marketing and Communications team any instance of social media misuse in relation to GRAHAM, its partners and associated organisations.

It is strongly advised not to respond to any such misuse, but rather to make a suitable member of the Marketing and Communications team aware as soon as possible. Any instance of misuse can be reported by contacting the team through marcoms@graham.co.uk.

We appreciate that genuine mistakes may occur and if this instance arises you should immediately inform the Marketing and Communications team. The team will advise on the best course of action to rectify the matter. Where appropriate, you may be requested to edit a post or comment, clarify a statement on social media or remove the post in its entirety.

Please note that deliberate non-compliance with this social media policy may result in disciplinary action up to and including summary dismissal, and by contractors, agents or other third parties working on our behalf, in termination of contract.

If you have a concern or suspect a violation of this policy, you should notify the Marketing and Communications team immediately. Speaking up can be a difficult thing to do, so be reassured that all information received will be treated seriously, in confidence and investigated appropriately.

Employees, supply chain employees, contractors, agents or other third parties working on our behalf must remove any offending content immediately from their personal profiles if they are asked to do so by the Marketing and Communications team.

8. Social Media Ambassadors

There are many positive, informative, educational and interesting stories happening right across GRAHAM and we need employees, subcontractors and partners to share insights and information. Contact the Marketing and Communications team to develop

these into suitable posts to share on GRAHAM social media platforms through marcoms@graham.co.uk.

9. Marketing and Communications Team contact details

Email: marcoms@graham.co.uk

Contact Number: 028 9268 9500 (Marketing Department)