

# SOCIAL MEDIA POLICY

## I. INTRODUCTION

Sterling GP Limited ("the Company") recognises that social media is widely used by employees in both personal and professional contexts. While we acknowledge the benefits of digital communication, it is essential that employees use these platforms in a manner that upholds the Company's values, reputation, and legal obligations.

For the purposes of this policy, "social media" includes all websites, apps, and communication tools used to create, share, or exchange information online. This includes (but is not limited to) LinkedIn, Facebook, X (formerly Twitter), Instagram, Snapchat, WhatsApp, YouTube, TikTok, Reddit, Threads, blogs, forums, and similar platforms.

This policy applies to all employees, contractors, agency workers, and any individual working on behalf of Sterling GP Limited. It covers conduct inside and outside working hours, regardless of whether the content is shared using personal or companyowned devices.

# 2. GENERAL EXPECTATIONS

All employees are expected to act responsibly and professionally when engaging with or posting on social media. The following principles must be followed at all times:

- Be respectful of colleagues, clients, and the Company.
- Maintain confidentiality and never share sensitive information.
- Avoid any activity that could harm the Company's image or relationships.



# 3. SPECIFIC GUIDELINES

#### 3.I COMPANY-RELATED CONTENT

Employees must not share any information related to the Company's operations, services, clients, or suppliers on social media without prior written approval. This includes experiences or issues encountered while performing work duties.

## **3.2 USE DURING WORKING HOURS**

Personal use of social media must not interfere with job performance. Unless required for legitimate business reasons, employees should not access social media during working hours using Company systems or equipment, unless expressly authorised by a line manager or Director.

#### 3.3 PERSONAL VIEWS

If you discuss topics that relate to your role or industry, you must make it clear that the views expressed are your own and not those of Sterling GP Limited. Any ambiguity that could lead others to associate your opinions with the Company must be avoided.

#### 3.4 CONFIDENTIALITY AND CONSENT

Posting content that contains confidential business information, personal data about colleagues or clients, or material shared in confidence is strictly prohibited. No photos, videos, or commentary involving Company property, individuals, or events should be shared without appropriate consent.

#### 3.5 REPUTATIONAL RISK

Employees must not post content that could be seen as discriminatory, defamatory, offensive, misleading, or otherwise damaging to the Company's reputation or relationships. This includes indirect or implied references.

#### 3.6 LEGAL CONSIDERATIONS

Social media content is considered a form of publication. Anything posted online may be subject to legal scrutiny and may be used as evidence in formal investigations or legal proceedings. Employees may be held accountable for posts that breach this policy, even after leaving employment.

### 3.7 MONITORING AND OVERSIGHT

The Company reserves the right to review publicly available content and, where appropriate, take action to protect its business interests. Monitoring may be carried out by the Company or an authorised third party, within the bounds of applicable data protection laws.





## **3.8 COMPLAINTS AND CONCERNS**

Social media must not be used as a channel to air workplace complaints or grievances. These matters should be raised through appropriate internal procedures, such as speaking with a manager or the HR team.

#### 3.9 BUSINESS INFORMATION AND PUBLIC PERCEPTION

Do not disclose trade secrets, commercially sensitive data, or internal communications. You are personally responsible for anything you share online. A single careless comment can negatively impact perceptions of the Company and may remain accessible for years.

## 3.10 DISCIPLINARY AND LEGAL CONSEQUENCES

Improper use of social media can lead to disciplinary action, including termination of employment. In some cases, misuse may lead to civil or criminal liability. Breaches will be handled in accordance with the Company's disciplinary procedures.

## 4. ADVICE AND CLARIFICATION

If you are uncertain whether a post or comment may breach this policy, consult your manager or the HR department before publishing. When in doubt, it is always safer not to post.

# 5. POLICY AIMS AND ENFORCEMENT

This policy is in place to safeguard both employees and Sterling GP Limited from reputational harm, legal exposure, and interpersonal conflict. Failure to comply with this policy may lead to disciplinary action. The Company reserves the right to take appropriate steps as needed.

Approved By	Position	Signature	Date
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