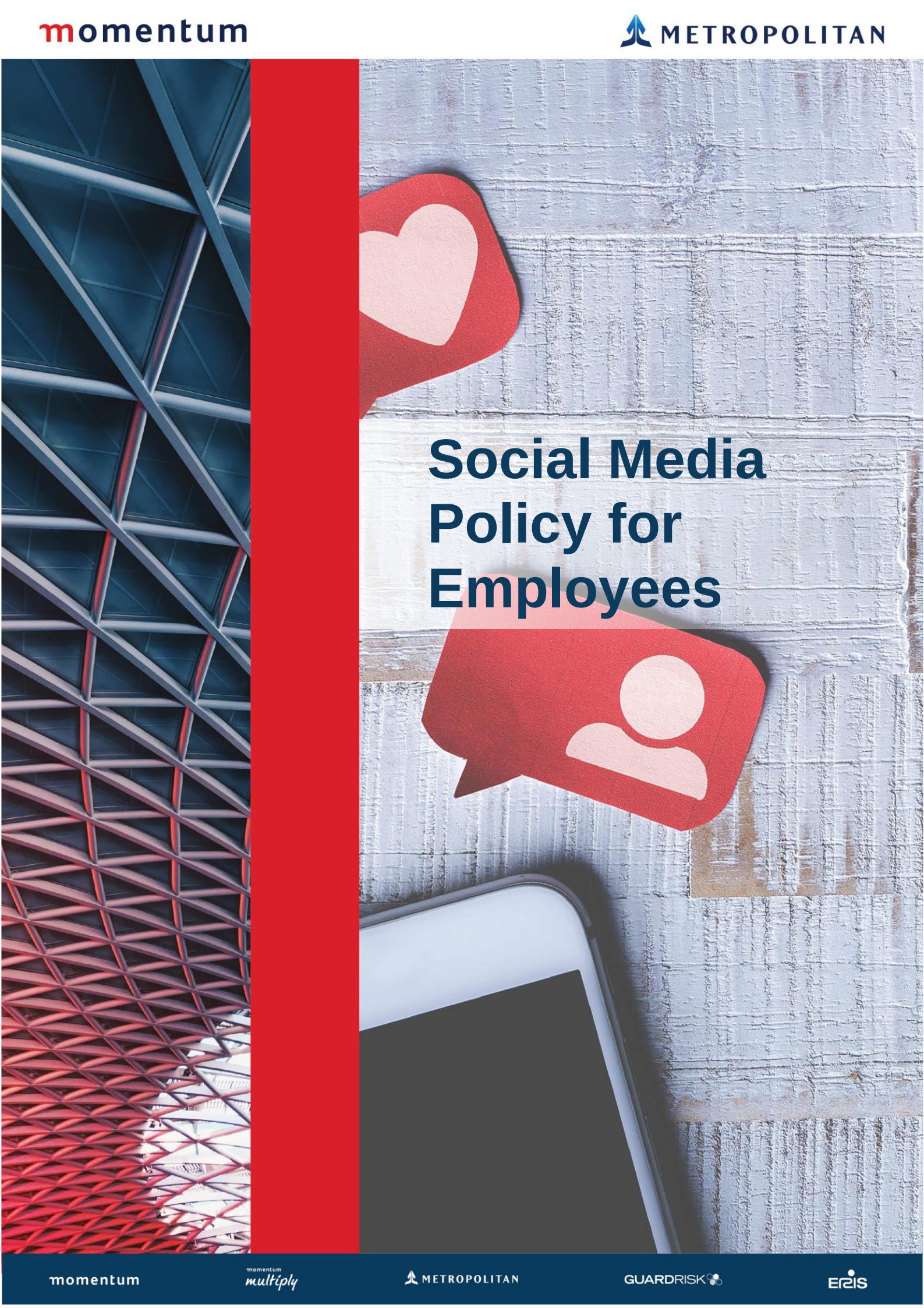




Social Media Policy for Employees



SOCIAL MEDIA POLICY FOR EMPLOYEES

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1 DEFINITIONS AND GLOSSARY OF TERMS

** Note: not all of the definitions are verbatim from any specific act*

Term	Description
Confidential Information	Means all trade secrets, know-how, business and financial information, and other proprietary information or data disclosed to one party by the other, or incorporated in materials or products provided to one party by the other and marked or indicated to be confidential
Employee	All directors including non-executives, senior officers, executives, employees including temporary employees, (collectively referred to as “Employees”).
Affected individuals	To include tied financial advisers, consultants and contractors including contractors of contracted service providers of Momentum Metropolitan (collectively referred to as “affected Individuals”).
Momentum Metropolitan or ‘the Group’	Momentum Metropolitan Holdings Limited and all its subsidiaries, its client-facing brands, and business areas.
Social Media	Means any facility for online publication, communication and commentary, including, without limitation, blogs, wikis and platforms such as Facebook, Instagram, WhatsApp, LinkedIn, Twitter, Snapchat, YouTube, and any other forms of communication that may now, and in the future, be classified or generally regarded as social media.

2 INTRODUCTION

Social media has become an important and powerful tool that, if used correctly, provides an opportunity for unprecedented levels of engagement with clients, communities, consumers, shareholders, key stakeholders and the general public.

However, the use of social media – in both a personal and professional capacity – has risks attached to it. In particular, social media presents significant risks to the privacy, corporate security and reputation of Momentum Metropolitan. The Group is under an obligation to limit and wherever possible, avoid those risks.

With this in mind, this Policy regulates your participation on social media by providing guidelines as to what constitutes acceptable and unacceptable use of these platforms. The purpose of this Policy is to ensure that your use of social media does not compromise Momentum Metropolitan in any way.

This Policy supersedes any previous Policy.

3 DOCUMENT CONTROL

Document Status	Approved
Document Owner	Chief Marketing Officer
Approved by	Momentum Metropolitan Exco
Date Approved	01/06/2020
Evidenced by	Minutes/emails
Document Location	Momentum Metropolitan Intranet

The effective date of this policy is 1 June 2020.

4 RELATED POLICIES

The related policies are set out in the Momentum Metropolitan Data and IT policy framework and must be taken into consideration as accompanying documents to the Cloud Computing Policy.

5 POLICY SCOPE OF APPLICATION

The policy applies to Momentum Metropolitan and its employees as well as affected individuals as defined in this policy.



6 POLICY SCOPE

6.1 This policy applies to:

6.1.1 your own content on social media;

6.1.2 your private digital content which is intercepted, forwarded or captured as a screenshot and then published on social media.

Example: Someone may take a screenshot of your sexist comment in a private message which then goes viral; and

6.1.3 your conduct in the real world which is documented digitally and published on social media.

Example:

Momentum Metropolitan employee makes a racial slur while out drinking, someone overhears the individual or takes a picture/video and turns to Twitter with “Just heard some guy on a racist rant. He says he works at Momentum”.

Momentum Metropolitan employee is filmed in a vicious road-rage attack which is published on YouTube and a viewer identifies the individual as an employee of the Group.

6.2 This Policy governs the use of social media by Momentum Metropolitan employees, intermediaries, affected individuals as defined in the policy, contractors and consultants, in both a personal and professional capacity. This includes but is not limited to: individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, intermediaries, trainees, part-time and fixed-term employees, casual and agency staff and volunteers.

6.3 Breach of this policy may be dealt with under Momentum Metropolitan’s code of conduct and, in serious cases, may be treated as gross misconduct leading to dismissal.

7 IMPORTANT SOCIAL MEDIA GUIDELINES

Although you are required to read the entire Policy, particular notice should be taken of the following key principles relating to social media

7.1 **Everything you say and do online reflects on Momentum Metropolitan and all its consumer-facing brands** – When engaging on social media, don’t forget that you are an ambassador of Momentum Metropolitan and its brands. In the age of the Internet, your content is easily associated with the Group and its brands, even if you don’t overtly associate yourself with Momentum Metropolitan on any social media platform. Before posting anything on social media, ask yourself whether your content is something that could reflect negatively on yourself or on Momentum Metropolitan. If there is a chance that it will, don’t post it. For example, distasteful jokes about rape, HIV/AIDS, bomb threats or the like are not acceptable.

7.2 **Nothing about social media changes your responsibilities and obligations to Momentum Metropolitan** – It does not matter if you are using your or a private account, a pseudonym account,



an anonymous account, or using social media outside of work hours or outside of work premises: your obligations in terms of your contract with Momentum Metropolitan and any other applicable policies within the Group, apply equally to your conduct on social media.

- 7.3 **Remember that it is “published”** – Under South African Law, once **one** other person has seen your content on social media, it is considered “published content” and can therefore carry the same legal consequences as content that is published in a newspaper, on television or any other public platform.
- 7.4 **Once it’s out there, it’s out there for good** – Remember that the Internet never forgets – what you publish will be around for a long time, so reflect on and edit your content carefully. If you feel even slightly uneasy about something you are about to publish, then you shouldn’t do it. If in doubt, always discuss it with the Reputation Team at Info@mmltd.co.za.
- 7.5 **Social media lacks context and tone** – Humour, irony and sarcasm are often hard to understand without your facial expressions and gestures (even with emoticons and emojis) and can create misunderstandings. Consider what you say carefully and think about how it might be interpreted.
- 7.6 **You have the right to freedom of expression but that right may not unjustifiably infringe on the rights of others** – for example, someone else’s right to a good reputation, dignity or privacy. Your right of expression doesn’t allow for the humiliation of other people. Before you post something on social media, think about the impact that it could have on your colleagues, clients, stakeholders, Momentum Metropolitan itself and the general public.

8 KEY POLICY PRINCIPLES

Momentum Metropolitan fosters an open and expressive environment and does not object to, or discourage, the personal use of social media.

However, in using social media, always remember that your relationship with Momentum Metropolitan is based on **trust**. You have a **legal duty to act in good faith towards the Group**. This duty extends to not doing anything on social media that may bring the name of Momentum Metropolitan into disrepute and requires you to always act in the best interests of the Group.

Remember that you are an ambassador of the Momentum Metropolitan brand, its subsidiary brands and the reputation of all of these brands. Whenever you are on social media, it is your responsibility to behave appropriately according to the standards set in this policy. You may be held responsible for any harm, (including potential harm and reputational damage or financial loss), that may result from any social media commentary you make.

The following principles outline the conduct that is to be followed when engaging digitally (which includes real world conduct which is documented digitally):

- 8.1 **Respect the law and the rights of others** – The public, your colleagues, Momentum Metropolitan employees, associates, stakeholders and clients of the Group all reflect a diverse set of cultures, values and points of view. Don’t be afraid to be yourself on social media, but do so courteously and



respectfully, and be thoughtful about how others may be affected. Do not upload, post, forward or post a link to any content that:

- Is offensive, derogatory, defamatory, racist or insulting – for example, calling someone the k-word, a slut or falsely accusing them of theft;
- Amounts to hate speech – hate speech is harmful or hateful content that discriminates on the basis of any of the prohibited grounds such as race, gender, ethnicity, sexual orientation or religion;
- Is fraudulent or untrue;
- Is harassing or threatening;
- Is abusive, obscene, pornographic, indecent, lewd, suggestive or otherwise objectionable;
- Is invasive of the privacy of others – before you post anything on social media, think about whether the content is yours to share (and be particularly mindful of posting photographs of others without permission); or
- Infringes on intellectual property rights – for example, using written content, logos or pictures without permission.

8.2 **Retweeting, sharing or liking content** – Even if you did not originate the content, you could potentially be held as responsible for material that you retweet, share or like on social media, as if you had published the content yourself.

8.3 Be careful what you say about Momentum Metropolitan on social media. Be particularly mindful of the following:

8.3.1 **Do not share the Group's confidential information** – Remember that the confidentiality obligations outlined in your contract with Momentum Metropolitan and other applicable policies apply on social media too. You cannot disclose private or confidential information that is financial, operational or legal in nature.

Sensitive financial information cannot be shared (even if it shows the company in a positive light). * *Note the classification standards set out in the Momentum Metropolitan Data Privacy Policy to identify when data is confidential*

If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with the Reputation Team at Info@mmltd.co.za.

8.3.2 **Do not air your grievances online** – You may not use your personal social media platforms to air personal grievances regarding Momentum Metropolitan, its products, policies, procedures, co-workers or otherwise. The Group has well-established internal grievance policies and whistle-blowing mechanisms, which can be followed if you have a grievance against the company.

Example:

- This is the most discriminatory and outdated maternity leave policy I have ever seen!

- My colleagues are incompetent! I honestly don't know how anything gets done around here.

8.3.3 **Do not violate the privacy of colleagues** – We respect the privacy of our customers, employees and contractors and you have an obligation not to violate that privacy. Before you post anything on social media, think about whether the content is yours to share.

Example:

- Congratulations Mary Smit on your pregnancy.... But Mary has not told anyone that she is pregnant yet and her husband finds out on social media.
- How was your hot date last night Dennis Peters? (not knowing Dennis is married and the hot date was not with his wife...).

8.3.4 Do not discuss your co-workers on social media without their permission.

8.3.5 **Be discerning when you post photos of work events** – We want you to share the great things we do, such as product launches and CSI events. However, pictures of the late night party at the team building may not be appropriate. Think carefully about whether your post will build the brand. When in doubt, don't – or check in with the Reputation Team. Also ask the people in the photo if they would be comfortable with you posting a photo of them on social media.

8.3.6 **Do not disparage (criticise) any of Momentum Metropolitan's brands** – While we acknowledge that you may wish to periodically post content on social media about your job, you may not comment negatively on social media about Momentum Metropolitan, or any of its brands, operations, promotions, projects, events, activities or clients (whether directly or indirectly). Please note that you do not need to specifically mention the name of any of the Group's brands in order to be associated with it.

Example:

"30% Cash back on car and home insurance – this company is just asking for trouble!"

8.3.7 **Do not comment on Mergers and Acquisition activity (M&A)** – You must not comment publicly on Momentum Metropolitan's M&A activity, including potential and pending acquisitions, regardless of their status. Any commentary on what a transaction or potential transaction may mean to the Group, positive, negative or neutral, can be problematic.

8.3.8 **Do not discuss future offerings** – Do not discuss product upgrades or innovation unless specifically authorised to do so.

8.4 **Do not disregard the Momentum Metropolitan values** – Do not say or do anything contradictory or in conflict with Momentum Metropolitan's values. This includes commenting in an inflammatory or objectionable way on topics such as politics, religion, race, sexual orientation, age, disability or nationality. Don't escalate heated discussions, try to be conciliatory, respectful and quote facts to



correct misrepresentations. Never contribute to a discussion if you are angry or upset, return to it later when you can contribute in a calm and rational manner.

- 8.5 **Do not speak on the company's behalf and let the experts respond to posts** – No person may use social media in the name of, or on behalf of, Momentum Metropolitan without the express permission of the Marketing or Reputation Teams. At no point are you authorised to engage with the media or the public on behalf of the Group or its brands (whether publicly or privately). Any breach of this restriction will amount to gross misconduct.

Example: From time to time our brands may get negative public attention and there may be many general public posts around, for example, Momentum's stance and conduct/behaviour on social and traditional media. If you responded by saying, for example, "as a Momentum employee I feel X, Y, Z..." and you are not an official spokesperson or social media manager of Momentum Metropolitan and its brands, then you would be in violation of this policy.

- 8.6 **Follow the codes and policies** – Momentum Metropolitan's codes and policies, including but not limited to the Code of Conduct, apply to your online conduct just as much as they apply to your offline behaviour. Make sure you're familiar with them.

- 8.7 **Promptly clarify statements that are misinterpreted** – Even well-considered statements can create confusion and be misinterpreted. Always monitor the comments your posts may generate and clarify your statement if needed.

- 8.8 **Use privacy settings** – This limits the extent to which your activities are visible and accessible to the public, clients, colleagues and the company. Be aware that social media platforms frequently modify privacy settings and terms and conditions, so what's private today, might not be private tomorrow. Even if you have maximum privacy controls, never forget the power of a screenshot.

- 8.9 You may not set up a social media account, blog or webpage carrying the identity of any of the Group's brand identities (including name or logo), without the express permission of the Marketing or Reputation Management teams. Official use of the brand logos and corporate identities of Momentum Metropolitan's brands on authorised social media channels must comply with the official Corporate Identity (CI) guidelines of the brand.

- 8.10 You may not use the company name to endorse or promote any product, opinion, cause or political candidate on social media.

- 8.11 **Do not market/promote Momentum Metropolitan's competitors** – they are responsible for their marketing, not you! Please be thoughtful when posting any content that identifies competitors' brands and be mindful that as an employee of the Group, your enthusiasm for a competitor could be taken as a recommendation.

Example: If Sandy says she just got an amazing deal at Discovery on medical aid, it must be the best deal in the market. She is in the health insurance industry. It's interesting that she didn't use Momentum or mention their policies even though she works there.

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- 8.12 **Do not speak negatively about competitors** – Momentum Metropolitan discourages any abuse of or attacks on other companies, particularly our competitors, on social media.
- 8.13 **Be truthful and avoid misrepresentation** – Do not say anything that is dishonest, inaccurate or misleading. If you have a vested interest in something you are discussing, point it out, and if you make a mistake, be up-front about the error and correct it quickly. Be particularly mindful not to reflect an inaccurate job title or company on your LinkedIn profile.
- 8.14 **Be accurate** – In the age of fake news, fact-check all posts, comments and links to ensure they are accurate and true before posting them. Be aware that from time to time fake news can be classified as a crime.
- 8.15 As soon as you leave the employ of, or end your association with, Momentum Metropolitan and its brands, you are required to remove all social media references to the Group and its brands as your current employer or associate. This includes updating your LinkedIn profile to show that your employment/association has come to an end.
- 8.16 **Don't forget your day job** – Your online activities should never interfere with your job performance or commitment to clients, customers and colleagues. Momentum Metropolitan has the right to restrict or prevent access to certain social media sites if it considers personal use to be excessive. Activity on social media during office hours should complement and/or support your role and should be used in moderation.
- 8.17 **Social media disclaimers don't prevent liability** – The use of disclaimers such as “*I tweet in my personal capacity*” or “*My views are not those of my employer*” will not prevent liability in terms of this Policy. There is no disclaimer that can absolve you of your duties to the company as described in this Policy, even when using an anonymous, fake or pseudonym account. You are who you are in the real world when you go online.
- 8.18 Understand that Momentum Metropolitan retains the right to examine the social media accounts of any individual associated with the Group. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.
- 8.19 **Help us to identify complaints and criticism** – Your assistance is vital in helping us monitor the social media landscape. Immediately upon becoming aware of a discussion thread, posting, comment, statement or misrepresentation that needs to be brought to the attention of the Group and/or has the potential to impact on the reputation of an individual, or the business as a whole, **take a screenshot of the content and immediately alert the Reputation Team at Info@mmltd.co.za.**

The best advice is to have fun on social media, but responsibly. Ultimately approach social media in the same way as you approach the ‘real world’. Ask yourself the question – would I be okay to see this on a billboard on the N1 highway? Or would I show this to my child/parents? Use sound judgment and common sense, act with professionalism and integrity, and adhere to the Momentum Metropolitan values. Most importantly, always remember that you are an ambassador for the company – whether you’re on social media or not – and that your conduct on- and offline has the potential to cause serious damage not only to the reputation of the Group, but also to your own reputation and career.



9 GUIDELINES FOR WORK WHATSAPP GROUPS

Momentum Metropolitan recognises that many employees are part of WhatsApp groups which have been established for the sole purpose of providing a communication channel amongst employees and contractors of Momentum Metropolitan (the “**Groups**”). Before setting up a group, it is important to first establish whether or not it is a requirement to be in the group for operational reasons, if not, participation is at the peril of the employee should communication standards not be adhered to. The following guidelines are to be followed when engaging in any communication on the Groups.

- 9.1 **Permission:** Always request someone’s permission before you add or remove them from a group.
- 9.2 **Relevant content only:** Try to keep the content relevant to your colleagues. In certain cases, it will be relevant to discuss current affairs or social issues on these groups but be careful not to waste your colleagues’ time. Advertising, political endorsements, and other non-related topics are prohibited on these groups, unless otherwise approved in advance by the Group administrator.
- 9.3 **Only respond if necessary:** Do not reply for the sake of replying. If a message does not require a response, please do not respond. The volume of messages on Groups can become overwhelming. You do not need to acknowledge receipt unless specifically asked to do so. Comment only when your information adds value.
- 9.4 Long conversations, especially if only involving a few members of the Group, are to be taken off the Group, unless it serves to aid inclusivity and transparency.
- 9.5 **Membership on these Groups is part of your job.** You have been made a member of these Groups/this Group for the purpose of information sharing. As the information shared may be relevant to your job deliverables, you may not leave these Groups/this Group without specific approval from your manager.
- 9.6 **The content shared on these Groups is for the members of these Groups only and shall not be shared with any third party.** These chats are confidential, may be legally privileged and are solely for the intended addressees. Disclosure, copying (e.g. by screenshot) or distribution of these chats to unintended recipients is prohibited.



10 GOVERNANCE OF THIS POLICY

10.1 OWNERSHIP OF POLICY

Ownership of this policy is vested with the **Chief Marketing Officer**.

10.2 DRAFTING AND AMENDMENTS

The **Reputation Management and Public Relations team** is responsible for the co-ordination, the drafting of and the amendments to this policy. Any material changes to the policy must be approved by the Momentum Metropolitan Exco.

10.3 APPROVAL

This policy must be approved by the Momentum Metropolitan Exco.

11 COMPLIANCE

11.1 You must co-operate with any investigation by Momentum Metropolitan into a breach of this Policy.

11.2 You are legally liable for everything you do, say or post on social media. Failure to adhere to this Policy could result in disciplinary action up to dismissal, in accordance with Momentum Metropolitan's Disciplinary Code.

11.3 If you notice any use of social media by other members of staff in breach of this Policy; please report it to the Marketing team.

12 NON-COMPLIANCE

Momentum Metropolitan views any non-compliance to this policy as well as any non-compliance with its obligations in terms of legislation in a serious light. Any deliberate action by an employee to contravene this policy will be subject to disciplinary action or termination of employment. All instances of non-compliance with this policy will be included within the regular risk reporting process.

13 UNCERTAINTY AND QUERIES

If you are in any way uncertain or unclear as to whether or not you are permitted to post something on social media please contact your supervisor, the Marketing team or the Head of Reputation and PR.

14 IMPLEMENTATION

The CEO of each business area is accountable for the implementation and adherence to this policy in his/her respective business areas.

15 DISCIPLINARY ACTION

Where a POPIA complaint or a POPIA infringement investigation has been finalised, Momentum Metropolitan may recommend any appropriate administrative, legal and/or disciplinary action to be taken against any employee reasonably suspected of being implicated in any non-compliant activity outlined within this policy.

In the case of ignorance or minor negligence, Momentum Metropolitan will undertake to provide further awareness training to the employee.



Any gross negligent or the wilful mismanagement of personal information will be considered a serious form of misconduct for which Momentum Metropolitan may summarily dismiss the employee. Disciplinary procedures will commence where there is sufficient evidence to support an employee's gross negligence. Examples of immediate actions that may be taken subsequent to an investigation include:

- A recommendation to commence with disciplinary action.
- A referral to appropriate law enforcement agencies for criminal investigation.
- Recovery of funds and assets in order to limit any prejudice or damages caused.

16 REVIEW

This policy will be reviewed by Reputation Management and Public Relations on an annual basis and submitted for approval.