



鷹君集團有限公司
Great Eagle
Holdings Limited

SOCIAL MEDIA POLICY

Purpose

The use of online social and business networking sites is now commonplace and part of our daily lives. Great Eagle Holdings Limited (the “Company”) recognizes that new technologies provide unique opportunities to build our business, communicate and engage with customers and employees through the use of a wide variety of social media. However, how we use social media and what we say also has the potential to affect our business interest and expose the Company and/or its subsidiaries (the “Group”) to business or legal risks particularly the vicarious liability of employees.

This Policy sets out the basic standards of behavior expected of all employees and the procedures must be followed by them regarding the use of social media, both personally as well as in their capacity as representatives of the Group. Social Media refers to any tool or service that facilitates communications over the internet. It covers all (and emerging) social media platforms, including but not limited to:

- Social networking sites – Facebook, LinkedIn
- Micro-blogging sites – Twitter, QQ
- Blogs – including company and personal blogs as well as comments
- Video and photo sharing websites – Flickr, YouTube, Instagram, Snapchat
- Forums and discussion boards – iforum, Google Groups, Yahoo! Groups
- Online encyclopedias – Wikipedia
- Ratings and reviews sites – TripAdvisor, Zagat, Openrice

Every employee has a personal responsibility to be familiar with and comply with this Policy.

Scope

This Policy applies to all of the Group’s employees (including Executive Directors of the Company) in their capacity as representatives of the Company or any member of the Group. This Policy also applies to third parties who work for/with the Group, including but not limited to our contractors, suppliers, agencies and business partners.

Principles, Guidelines and Procedures

General Principles

Set out below are the general principles regarding the participation of social media. If you have any questions about these principles, this Policy, please email Company.Secretary@GreatEagle.com.hk.

1. *Best Interests.* You are expected, when using social and business networking sites and the internet, to act in all situations in the best interests of the Group.
2. *Protect confidential and proprietary information.* Get permission from the content owner prior to sharing or publishing such contents which may contain intellectual property of owner of such content, and get permission before publishing or reporting on meetings and conversations that were meant to be internal. Employees may be held accountable for misuse of the Group's confidential information on social media sites, even if this occurs outside of office working hours or they have ceased to be employees of the Group.
3. *Authorisation.* Do not attempt to post information about the Group and/or our brands when you discharge your job duties unless you have approval from your manager or the authorized spokespersons in our Policy on the Preservation and Prevention of Misuse of Inside Information (as the case may be). It is important to put in place certain checks and balances procedures to make sure things stay on the right track and are sustainable.
4. *Disclosing Affiliation.* Be transparent and disclose your affiliation with the Group when speaking for the Group. How exactly you make this disclosure may vary depending on the circumstances and the platform, but the important thing is to make sure people reading your statement will be able to immediately identify that you are affiliated with the Group. These disclosure requirements are equally important for any contractor, agency, vendor, business partner, third party who is representing the Group online.
5. *Disrepute.* You must not use sites in such a way that the Group's interests or reputation is or may be damaged whether directly or indirectly. You must not use social media to embarrass, defame or disparage the Group, our staff or any third party; to harass, bully or unlawfully discriminate against other staff members or third parties; to make false or misleading statements; or to impersonate other colleagues or third parties.
6. *Compliance with corporate policies and standards.* Follow the Group's Code of Conduct / IT policies and procedures and all other Company policies, all applicable laws and all applicable guidelines issued by the relevant authorities, including but not limited to discrimination, harassment, data privacy, copyright and fair use.

7. *Act Responsibly.* Electronic messages are permanent, transferable records of your communications and can affect the reputation of our Group. Provide worthwhile, factual, non-confidential information and perspective. You are responsible for and may be held accountable for your words and actions.
8. *Use Sound Judgment.* Anything you post has the potential to be viewed by anyone, and your comments could be misinterpreted by customers, competitors and other employees.
9. *Personal Use.* In general, personal use is only acceptable during non-office hours or lunch breaks, or during work time when work related. Employees should exercise sound judgment and discipline with respect to time spent. Social or business networking activities at work must not impede your ability to fulfill your primary job duties and responsibilities.

Specific Guidelines and Procedures

The following specific guidelines and procedures apply when the employees or any third parties who work for/with the Group use social media (i) as part of job responsibilities, (ii) as means for business collaboration and communication; and (iii) for personal use. In all cases, the following compliance plan/process should be in place:

1. *Have a designated owner:* Every company-sponsored social media platform must have a designated owner knowledgeable about his/her roles and responsibilities.
2. *Obtain approval for new social medial platform. Check with IT:* Any acquisition or development of new internal social media platform or new external company-sponsored site shall be processed in accordance with the applicable IT policies and procedures.
3. *Review user-generated content:* Any company-sponsored social media platform which will allow customers or external stakeholders to post photos or other user-generated content must get prior review from your manager or if appropriate, the Legal Department.

- **As Part of Job Responsibilities**

In addition to the general principles regarding the participation of social media as mentioned above, you are expected to observe also the following guidelines when speaking on behalf of the Group:

1. Make sure your agency partners understand how we expect them to conduct themselves on our behalf.

2. Ensure that any collection, sharing, storage, accessibility, and/or use of any information that directly identifies an individual such as name, physical and email address, staff ID, photograph on social media complies with all applicable laws and guidelines in respect of privacy. If there is any doubt, please consult Human Resources Department and Legal Department
3. As an online spokesperson, you must ensure that your posts are completely accurate and not deceptive or misleading. If there is any doubt, do not post it.
4. If you are engaging in social media activities on behalf of the Group or any one or more of its brands, make sure you have completed the proper training.
5. Do not claim authorship of something that is not yours. If you use someone else's material, make sure you have the proper rights to use it. Do not use copyrights, trademarks, publicity rights, or similar rights of others without the necessary permission. Permission granted may be restricted to certain geographies, certain time periods, certain brands/products, certain media/content channels. You should use such materials consistent with the terms of such permission.
6. Remember that your local posts can have global significance. The way that you answer an online question might be accurate in some parts of the world, but inaccurate (or even illegal) in others. Keep that "world view" in mind when you are participating in online conversations.
7. Remember that the Internet is permanent. Once information is published online, it is essentially part of a record, even if you remove/delete it later or attempt to make it anonymous.
8. Be mindful that you are representing the Group. Consistently demonstrate respect when interacting on social media sites. Be respectful of all individuals, ethnicities, cultures and religions. Think before you respond to negative comments and do not use or repeat inflammatory words. Keep it polite and consistent with our purpose, values and principles.
9. Do not engage with any representatives from competitors' brands or on forums/sites which are sponsored by competitors with no good reasons.
10. Ensure your company-sponsored participation in social media complies with all applicable laws and company policies, in particular:
 - (a) If you plan to conduct any type of social media advertising, public relation or research execution
 - (b) If you plan to run a blogger outreach campaign
 - (c) If you ask candidates, customers, etc. to submit their own text, photos, videos, etc. including for contests, or promotions

- (d) If you repurpose any content gathered from user-generated content campaigns/executions
- (e) If you host a team or brand page, add Facebook widgets/tools to Company-sponsored websites, or use Facebook for advertising purposes
- (f) If you plan to allow for sharing functions from Company-sponsored sites/content to third party social networks
- (g) If you anticipate using or mentioning celebrities in social media campaigns
- (h) If you plan to host a forum for ratings and reviews on a Company-sponsored site
- (i) If you run a campaign or plan to create an app for consumer or employee use
- (j) If you plan to use listening tools to understand more about what customers and the news media are saying about brand, your competitors, and/or your industry
- (k) If, as part of a campaign, website, etc., you may be collecting personally identifiable information of any type and for any reasons, please ensure your action is in line with all applicable laws and guidelines in respect of privacy.

- **For Business Collaboration and Other Activities**

In addition to the general principles regarding the participation of social media as mentioned above, you are required to observe also the following guidelines if you use social media as a means to collaborate internally and externally with your co-workers:

1. For collaboration among employees through the Group's IT infrastructure, you must use company-sponsored tools or seek approval from IT Department / in-house IT functional head for use in any personal tools.
2. Protect assets and confidential information of the Group when you are permitted to use a non-company-hosted site for collaboration.
3. Should you wish to create a site or forum for your friends or peers within the Group that is not formally associated with work or company-sponsored, you should use external social media sites for these interactions. These forums should not indicate the Group's approval, ownership or sponsorship in any way. All other applicable Group policies must be followed.

4. Usernames and passwords for social media accounts must be centrally managed and documented. This is intended to facilitate access to the login information in the event of employee transitions on leave.
5. Avoid using your Group email address for external social media networking as much as possible, except strictly for business purpose. Never use the same password for your Group email account and your external social media networking site. Your password for your Group email account must remain confidential.
6. Ensure your use of the company-sponsored social media sites complies with the policy and terms of use for the site.

- **For Personal Use**

Personal use is strictly only acceptable during non-office hours or lunch breaks, or during work time when work related and with the prior express permission of your manager. Social or business networking activities should not interfere with your primary job responsibilities and performance. When you use social media as a communication tool in your personal life, you are required to observe the following guidelines:

1. If you decide to talk about or post material related to the Company or any of our brands or businesses on social media you should obtain the prior approval from your manager, and even if such prior approval has been obtained, identify that you are an employee of the Group in every posting. Be clear in every posting that you are not speaking as a corporate representative. For example, you may state “I work for [the Company/Brand X], but the views expressed in this blog/post/etc. are my own and do not necessarily reflect the views and positions of my employer.” In addition, if you create a site or post content that gives the appearance of being linked to the Group, be clear that the post or site is not an official communication of the Group and that you are not speaking as a corporate representative. If there is any doubt, do not post it.
2. Do not reveal to the public customer reviews for Group services or competitors’ services.
3. When using social media in your personal capacity, always use your personal email, not your company email address.
4. Avoid providing opinions on past or current company colleagues and/or their work or performance on professional social media business sites.
5. When downloading apps to your personal computer or mobile device used for business purposes, do not allow transfer of your company contact lists or address books to third party social media networking or other online websites or databases. Do not allow social media sites to access your email contact lists located on company hardware and software.

6. Do not talk about your work projects on social media even if you feel it is a “private” conversation.

Policy Violation

Whether accessed at work or at home, the following can result in disciplinary action including dismissal while you may also be held personally liable:

1. Violation of any of the general principles, specific guidelines and procedures as set out in this Policy.
2. Any reference, direct or indirect, on social or business networking sites, blogs or other such sites, to your employer, employment, individuals or organisations, or funding partners and service users that could cause the Group’s reputation to be damaged; or
3. Use of a site that contravenes the Group’s policy or an illegal site; or
4. Use of a site where the Group or your individual duty of confidentiality is breached, where the dignity at work of colleagues is undermined or the values of the Group are compromised, where any other policies of the Group are breached.

If you become aware of or believe that the Group’s technologies and/or electronic communications are being used inappropriately or contain inappropriate statements, notify your immediate manager. We may request that employee/agencies change or remove comments made in social media that are inconsistent with this Policy or that make inaccurate references to the Group, its brands, and/or stakeholders. Failure to comply with such a request may in itself result in disciplinary action including dismissal. You may also be held personally liable.

Monitoring

To ensure this Policy is being complied with and for legitimate business purposes, we reserve the right to monitor, intercept and review of the activities of the relevant staff members which use our corporate resources and communications systems, including, but not limited to, social media postings and activities. Monitoring, interception and review of your activities will be performed with the approval of the General Manager or the respective Department/Business Unit Heads. Your consent is deemed by virtue of your use of such corporate resources and systems to our monitoring interception and review of your activities which use such resources and systems.

Date: 31 October 2014