




SOCIAL AND DIGITAL MEDIA POLICY

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00	1 April 2018	New document release - Social Media Policy	Ong Jee Lian, Melissa L	Jaya Menon	Gamuda Personnel Working Committee (GPWC)
01	13 September 2023	Updated document release – Social and Digital Media Policy	Faslika Das	Ong Jee Lian John Lim Wong Lye Ling	Gamuda Personnel Working Committee (GPWC)

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PURPOSE

Gamuda Berhad and its group of companies (“Gamuda”) recognises that Social Media usage may have an effect on Gamuda’s business, interests and reputation, as well as trigger violations of certain laws, rules and regulations.

For the purpose of this Social and Digital Media Policy, employees are referred to as ‘you/your’ and Gamuda as ‘Gamuda, us or our’.

SCOPE

“Social Media” includes, but is not limited to, all websites, AI Chatbots, online tools, applications, blogs, wikis, microblogs, message boards, discussions, forums, chat rooms, and social and AI related networks such as Facebook, LinkedIn, Twitter, Thread, Instagram, Tik Tok, YouTube Whatsapp, WeChat, Telegram, ChatGPT as well as videos and pictures, whether or not hosted or sponsored by Gamuda. This includes content that you may create, participate in producing or appearing in which are posted on or linked to your social media site that allows users to interact with each other, including the creating and sharing of information, opinions, knowledge and interests.

POLICY


Where Social Media use has been authorised or is otherwise permitted, you are expected to act responsibly and ensure that productivity is not affected. As a reminder, Gamuda’s IT resources belong to Gamuda and may be monitored or examined at any time to ensure compliance with Gamuda’s policies. You should have no expectation of privacy for any information posted using Gamuda’s IT resources.

Using Social Media excessively while at work can reduce efficiency and concentration. Any decline in your productivity will show in your performance reviews. Your personal social networking activities should never interfere with your job and, therefore, should be conducted outside of your work hours. Further, you should refrain from using Gamuda’s IT resources for your personal purposes.

You should always use Social Media with personal and professional integrity. You should never use social media, whether personally or professionally, in a way that may or could disparage or embarrass Gamuda, damage or tarnish its reputation, compromise stakeholders or disclose any of their personal information.

This Social and Digital Media Policy summarises the behaviours and/or etiquette expected of you when using Social Media, whether it occurs during or outside of work, but is not intended or construed to interfere with employees’ rights that may be protected under the respective country’s laws and regulations that Gamuda is operating in (Malaysia, Singapore, Australia, Taiwan, UK, India and Vietnam).

As technology evolves and continues with new social media innovations, this Social and Digital Media Policy is subject to change from time to time. You are advised to check the Employee’s Handbook or the corporate website for the latest edition/version.

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Please ensure you are familiar with this Social and Digital Media Policy and applicable Gamuda policies, as further referenced below. Failure to comply with Gamuda policies, procedures, and guidelines may lead to disciplinary action and/or termination of your employment or assignment with Gamuda, consistent with applicable laws. If you have any questions, please contact your supervisor, Group Corporate Communications and Sustainability (GCCS), Group HR and Admin, or Group Information Technology (GIT) for clarification.

ALL EMPLOYEES must conform to this Social and Digital Media Policy.

GENERAL GUIDELINES


When using Social Media, whether for personal or permitted business reasons, whether it occurs during or outside of work, the following guidelines shall apply:

Compliance with Gamuda Code of Conduct, the Employees Handbook and other Gamuda Policies, Procedures and Guidelines. You are personally responsible for all content you post and/or publish in the Social Media. Whenever you use, engage and/or participate in Social Media activities, you must ensure that you are in compliance with your obligations under Gamuda’s Code of Conduct, the Employees Handbook, and all policies, procedures and guidelines applicable to your role or your business group, including but not limited to any policy which limits, restricts or prohibits Social Media activity relating to our stakeholders due to requirements regarding but not limited to our clients, partners, suppliers, authorities, regulators, and ministries.

Protect Confidential Information. You have an obligation to safeguard Gamuda’s Confidential Information.

“Confidential Information” includes the personal, proprietary and/or confidential information you create or obtain as a result of your employment or assignment with Gamuda, information about Gamuda and its stakeholders, business partners and vendors (including but not limited to business plans, revenues, financial results, tender submissions, tender pricing, crisis incidents, future offers or performance), as well as documents, conversations and other information, that are intended to be privileged, private, confidential or internal to Gamuda (including communications, internal documents and other information regarding legal claims, proceedings or controversies relating to or brought by or against Gamuda) and the personal data and other information about Gamuda’s employees, its stakeholders, business partners and vendors.

Even if the information is in the public domain, unless Gamuda has authorised the publication of such information, you should assume that it is confidential and/or proprietary. Gamuda’s Confidential Information should never be posted or forwarded to an external Social Media site and may not be disclosed to any unauthorised person or for any unauthorised purpose or any internal social media site. If you are unsure what constitutes Confidential Information, please consult your supervisor.

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Do Not Act as a Spokesperson for Gamuda. Unless it is part of your job in Gamuda, you should be clear in your Social Media postings or publications that you are expressing your own views, not those of Gamuda. You should not speak for or on behalf of Gamuda or represent yourself as such (including through the use of your Gamuda title or business contact information), unless you have been authorised to do so with Gamuda’s approval. It is best to use a disclaimer at the outset, such as “This is my personal observation/view/blog etc. and contains my own views, thoughts and opinion. It is not endorsed by Gamuda and is not an official communication of Gamuda”.

Respect Third Party’s Confidential Information. Do not post, publish or solicit our stakeholders’, business partners’ or vendors’ proprietary or confidential information or any information or materials that appear to be confidential or proprietary. You may make observations about a stakeholder’s, business partner’s or vendor’s products and activities provided that you make it clear that those observations are your own and not of Gamuda. Do include the disclaimer as mentioned above too.


Response to Media or Press Enquiries. Anything that you post on Social Media may attract media attention. If someone from the media or press contacts you about social networking activities that relate in a way to or otherwise may affect Gamuda, its stakeholders’, business partners’ or vendors’, you must promptly refer such enquiries to Gamuda’s Group Corporate Communications and Sustainability (GCCS). Only authorised persons may speak to the media or press.

Use Your Good Sensible Judgment. While this Social and Digital Media Policy is intended to assist you in understanding your responsibilities, they cannot address every situation. You are expected to exercise good sensible judgment and to act responsibly and professionally. When in doubt or if you are about to research, post or publish something that makes you even the slightest bit uncomfortable, review it again and don’t post – consult your supervisor first. Please remember that neither the internet nor the intranet platforms forget. Anything researched, posted or published in error can never be effectively removed from the public digital domain.

Handling Complaints. There may be instances in which investors or other third parties make or lodge complaints or other grievances via Gamuda-hosted or authorised Social Media sites. In the event this occurs, GCCS must be alerted for review, investigation, and resolution to the extent necessary. All complaints are subject to applicable record retention policies, and individual business groups may have procedures for responding to complaints that must be followed, where applicable.

Retention and Supervision of Content. The content relating to Gamuda that is posted to a Gamuda-hosted or authorised Social Media site is a form of business communication and may be subject to supervision, recordkeeping, pre-approval requirements and monitoring. Please contact GCCS on the content for upload on the Gamuda and joint venture hosted sites such as Gamuda Corporate Website, Gamuda LinkedIn, Gamuda Facebook, Gamuda Twitter, Gamuda YouTube, Gamuda Workplace and other social media sites related to Gamuda or its subsidiaries or associated companies.

Identify Yourself. When you post content to a Gamuda-hosted or Gamuda-authorized Social Media site as part of your job, or you are otherwise approved to use Social Media, identify yourself and your affiliation with Gamuda; anonymous posts and use of pseudonyms are not permitted. If you believe that someone is posting or publishing content that is detrimental to Gamuda, please notify GCCS.

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Regulator/Business-Appropriate Content. Please keep in mind that when you research or post content to a Gamuda-hosted or Gamuda-authorized Social Media site as part of your job, you are acting as a representative of Gamuda. Even if you are researching, posting or publishing on your personal Social Media site, you need to conduct yourself accordingly. Be professional, polite and respectful in all your postings and publications, and do not make any postings or publications that may be interpreted or construed as defamatory, libelous, slanderous, seditious, racist, unlawful, false, insulting, offensive, obscene or discriminatory. Personal attacks, profanity, or any other violent, threatening or derogatory language or topics which are inflammatory or objectionable are not permitted. Whatever content you post or publish can reflect poorly on you and Gamuda, and could raise questions about Gamuda’s reputation as well.

Do not post, upload or share the nature of criminal activities, such as disseminating materials involving gambling, weapons and/or terrorist activities.


Protect Gamuda’s and your reputation. The content you submit may be read by your co-workers, Gamuda’s stakeholders, business partners and vendors, as well as the general public. Therefore, you must be mindful not to post or publish things that may disparage or adversely affect those involved. Content may be subject to Gamuda’s review and approval prior to posting or publication. If you become aware of any mistakes or errors, please correct it promptly and admit that it is your own mistake. If you choose to modify the earlier post or publication, please make it clear that you have done so. Also, do notify your supervisor and GCCS in case further action is necessary.

The informality of Social Media sites should not be a substitute for good sensible judgment; even anonymous postings can be attributed to you, and your affiliation with Gamuda may be disclosed without your knowledge.

Be respectful of your co-workers and how they may be affected by your posts. Do not post any personal or private information (including photos) about your co-workers or reference them in a manner in which they would be identifiable without their prior permission. Prior to sending or accepting “friends” or similar requests to or from a colleague or anyone who reports to you, you should consider whether there is an actual or perceived conflict of interest or if your engagement in Social Media activities with co-workers will in any way interfere with or undermine the work environment or your working relationships within Gamuda.

Compliance with Applicable Laws. Anything you post or publish is subject to your compliance with the applicable laws. Ignorance of the laws is not an excuse. A non-exclusive list of applicable laws is referenced at the end of this Social and Digital Media Policy.

Intellectual Property Rights. Please take care when researching, posting, or publishing third-party content, as it may be subject to trademark, copyright, or intellectual property rights protection and may require prior permission. You must comply with the applicable laws governing trademarks, copyrights, and intellectual property, and don’t post or publish anything that is or may be considered to be, in breach of trademark, copyright, or intellectual property rights.

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In addition, you may not use Gamuda’s trademarks or logos, copyrighted protected material, photographs or images of Gamuda’s premises or its businesses/services on any personal Social Media site.

Ownership of Content. All postings, publications, and any other submissions on a Gamuda-hosted or Gamuda authorised Social Media site shall be the sole property of Gamuda, and Gamuda shall exclusively hold the copyright and all other intellectual property rights to those postings, publications, and submissions. By you posting, publishing, or submitting your content, you are deemed to have irrevocably and unconditionally assigned all rights, titles, and interest in and to such posting, publication or submission to Gamuda, and you have agreed to execute any and all documentation necessary to effect or perfect such assignment.

Social Media Monitoring. As with any Gamuda IT resources usage, we may monitor and record access to and use of a Gamuda-hosted site and/or Gamuda authorised Social Media site in accordance with and to the extent permitted by applicable law and Gamuda’s Code of Conduct, the Employees Handbook, and all policies, procedures, and guidelines.


Protect against Identity Theft or Fraud. In providing personal information to Social Media sites, you may be disclosing information that could be used for identity theft, fraud or other illegal activity or be the basis of security questions or passwords. Be aware of the public nature of the Social Media sites, and the risks associated with providing personal information to such sites. Refrain from sharing sensitive or personal information, such as your Gamuda email address, business or personal telephone number, your national identity card details, or your home address. Further, you must ensure that the information you provide must not be used to gain unauthorised access to Gamuda and Gamuda IT resources or to Gamuda’s Confidential Information. To learn more, refer to Gamuda Internal Policy - Information Security Policy.

References. Gamuda has specific policies and procedures regarding references and employment verification. You should not provide references or other job or performance-related information regarding a current or former Gamuda colleague through any external online external source such as LinkedIn.

Anonymous Postings. These Guidelines, and all other applicable policies, standards and guidelines, apply to you and your personal postings regardless of how and whether you choose to identify yourself.

If you have any questions regarding these Guidelines, please contact:

- Your supervisor
- Group Corporate Communications and Sustainability (GCCS)
- Group HR and Admin
- Gamuda Information Technology (GIT)

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Relevant Related Policies

- HR Policies and Procedures Manual Employee Handbook
- Employee Performance and Conduct
- Sexual Harassment
- Whistle Blowing
- Information Security Policy

Key Relevant Laws and Regulations

- Communication and Multimedia Act 1998
- Printing Presses and Publications Act 1984
- Penal Code
- Evidence Act 1950
- Defamation Act 1957
- Personal Data Protection Act 2010
- Film Censorship Act 2002
- Security Offences (Special Measures) Act 2012
- Sedition Act 1948

- End of Policy -