Social Media policy statement

Keltbray recognise that social media is an integral part of modern life. It keeps us in touch with friends and family, it informs us about our world, and it gives us a platform to be heard.

Social media can be a powerful force for good, and we want to encourage employees to use social media in positive ways. When you are online, either on our intranet or externally, posting in your capacity as an employee of Keltbray, we have three requests of you:

1. Disclose your relationship to Keltbray
2. Protect the Group reputation
3. Use your common sense

Social media is rapidly changing, and this policy will evolve along with it. Check back frequently to make certain the policy hasn't changed to ensure you keep pace.

What does this policy mean? It means that we trust you. We bring smart people into Keltbray and we expect you to make smart decisions. This means that you are both the person in the best position to tell the world why Keltbray is such a great company to work for and the person best suited to protect Keltbray from reputational harm.

Disclose

Anyone can say anything on the internet. It is both the platform's greatest strength and chief weakness. When you are posting on social media in your capacity as a Keltbray employee, your integrity is on display for the entire world to see, and by association so is Keltbray's, so strive to be ethical, truthful, apolitical and decent.

1. When you are posting about Keltbray activities or services, include the hashtag #. This lets people know that you are affiliated with the Group
2. If you have a vested interest in something you are discussing, be the first to point it out and be specific about what it is
3. Be yourself! Stick to your area of expertise. Only write about what you know
4. If you are leaving Keltbray, please remember to update your employment information on social media sites
5. If you talk about Keltbray on any digital platform i.e. intranet, website or any form of social media, please use a disclaimer like this one: "All opinions are my own"

Protect

Keeping Keltbray confidential information confidential is a keystone of our business. Many employees know things about the company that could affect our business. It is essential to safeguard this information, especially on the internet.

1. **Protecting Keltbray is part of your job.** Do not post any confidential information on any social platforms. If the information has not been officially released by Keltbray, don't discuss it. This includes financial information, product information, and legal information.
2. Don't criticise Keltbray, our clients, our competitors, supply chain partners and Governmental or regulatory bodies –remember that maintaining strong relationships with these stakeholders is fundamental to our work-winning activities. Only authorised spokespersons should comment publicly on these subject matters. Authorised spokespersons are identified, selected, and approved by the Main and Executive Leadership Board, in conjunction with the Corporate Communications function.
3. Anything you publish must be true and not misleading, and all claims must be substantiated and approved.
4. If you are unsure whether or not to post something, err on the side of caution and don't – use the test: "Would I be comfortable seeing this on the front page of a national newspaper" – if the answer is no, then don't post it.

This is a helpful checklist of things to avoid posting on social media in your capacity as a Keltbray employee:

- Complaints about Keltbray
- Complaints about Customers / customer service issues
- Complaints about other employees
- Angry rants
- Unconstructive criticism about public figures
- Divisive political or social opinions
- Religious rants
- Intrusive questions
- Ridicule of any group of people

- Fake news
- Trashing our competitors
- Confidential company information
- Medical issues
- Personal events / pictures or dramas
- Apathetic updates
- Illegal content
- Controversial re-posts
- Irrelevant content

5. If the content you intend to share involves a client, for example, achieving a project milestone, make sure it has been approved by the relevant area on the client's side, and also inform our Communications team as a good practice.
6. Be cautious regarding Health and Safety. Use full PPE if you are working on-site. Sensitive images, such as heavy machinery handling, people on scaffolding, and similar situations, must always be approved by H&S before being shared externally.
7. Our Corporate Communications Team can help you decide if something is permissible to post. They can also review your LinkedIn profile for you to make certain you aren't inadvertently providing too much or the wrong information.

Use common sense

When you are online, you are representing Keltbray: our people, our values. There is no room for bigotry, prejudice, misogyny, or hatred in our company or on our associated social media feeds.

Just by identifying yourself as a Keltbray employee, you are creating perceptions about your expertise and about Keltbray. So do us all proud.

1. Stay away from making outlandish or fanciful claims about our products and services being smarter/faster/higher-performing in your social media postings – unless of course you can back the claim up with factual analysis
2. Did you mess up? It happens. If you make a mistake, admit it immediately. Apologise if you need to. Be upfront, and correct the error as soon as possible, and notify Corporate Communications so they can support you with any follow-up action
3. If you're posting to a blog, you may choose to modify an earlier post—just make it clear that you have done so. Additionally, if you see something being shared relating to Keltbray on a social media platform that shouldn't be happening, immediately inform the Corporate Communications department

Keltbray and its management team fully support this policy and are committed to provide competent personnel and financial resources to implement it. This policy statement shall be reviewed at least annually by all interested parties. New employees are briefed on the use of the Business Management System and locations of the Keltbray policies and any reviews or key changes in the policies are advised to employees.



Peter Burnside
Chief Executive Officer

Last review date: June 2026
Next review date: June 2027

Social Media – The Ten Golden Rules

This guidance provides practical advice for Keltbray employees on how to engage responsibly and constructively with social media networks in a work capacity. These networks can broadly be defined as blogs, micro-blogs, wikis, social networks, social bookmarking services, user rating services and any other online collaboration, sharing or publishing platform, whether accessed through the web, a mobile device, text messaging, email or any other existing or emerging communications platform.

4. **Only officially designated employees** – Can use social media to speak on behalf of Keltbray, its subsidiaries and divisions. However, employees may use social media to speak for themselves in a work capacity, although we ask that they please adhere to these guidelines when doing so.

5. **Follow Keltbray company policies** – When you discuss Keltbray-related matters on social media please ensure you adhere to our company policies as set out on the BMS. Also, consider the effects of your actions on your own reputation as well as on Keltbray prior to posting content.

6. **Add a disclaimer** – Only a few people within Keltbray are official spokespersons for the Group and its subsidiaries and divisions, and so if you are not one of them, please make clear you are speaking for yourself and not for Keltbray. You can use a disclaimer like 'all opinions are my own'.

7. **Make sure information is in the public domain** – Information you post about Keltbray should already be in the public domain.

8. **Responsibility** – You are personally responsible for the content you publish and remember that the internet never forgets. This means everything you publish will be accessible for a long time. Use common sense when posting material to ensure it is not inappropriate or harmful to Keltbray, your fellow employees or other company stakeholders.

9. **Don't compromise confidentiality** – Don't post or release information that is considered confidential or not already public. If you are unsure about what is considered confidential, please check with the Corporate Communications Function.

10. **Language and tone** – Act professionally, respect your audience and don't use ethnic slurs, personal insults or obscenities. We also encourage you to disengage in a polite manner if social media dialogue becomes heated.

11. **Make sure you have permission** – Employees should seek permission from the Corporate Communications Function before posting images of work situations, current or former employees or other stakeholders, to ensure they are appropriate, compliant and have been checked by HSQE. If you are using company or third-party material that is subject to copyright, it is important that you also have permission from the owner(s).

12. **Respect company property** – Social media use should not interfere with your responsibilities at work, and Keltbray computer systems and mobile devices should only be used to engage with social media for business purposes. Personal use of social media networks or personal blogging in work time is discouraged and could result in disciplinary action.

13. **Refer enquiries** – Social media content sometimes generates media attention or legal questions. Refrain from answering these and refer any inquiries of this kind to Corporate Communications: communications@keltbray.com.