

## Social Media Policy

The purpose of this Social Media Policy & Procedure is to clarify the company requirements that apply to the use of social Media and set out the requirements for what is and is not acceptable.

This policy deals with the use and misuse of social media platforms and other websites including but not limited to:

- Social networking websites including but not limited to Facebook, LinkedIn, Google+, yahoo, foursquare, tumblr, snapchat, myspace, bebo, QQ.com, Flickr, messenger, Whatsapp, Viber, VK, OK.ru, twitter, Instagram etc
- Multimedia websites such as YouTube.
- Wikis such as Wikipedia
- Blogs and news sites where content and comments can be posted.
- Any other website where user-generated content can be posted for wider viewing and sharing.

This policy applies to all individuals working at all levels in the Company, either in the office or on board the vessels and covers the use of social media (as outlined above) during work and non-work hours, on personal and Company supplied equipment such as laptop computers and cellular / smart phones.

The Managing Director, Heads of Departments and ships' Masters are responsible for ensuring that the standards set forth by this policy are communicated to their teams and that their own conduct sets a good example in this respect.

The Company recognizes the value of social media and expects all staff to use these tools responsibly.

The following basic principles should be observed:

- Be responsible. As an employee, any user-generated content could have an impact on the Company's reputation, so give careful thought before sharing photographs or video of the Company assets, particularly our ships, facilities or people in uniform. For example, images taken during an incident could potentially be detrimental to an investigation.
- Be accurate and honest. In any circumstance in which you are in doubt, or you are uncertain about how to respond to a post, contact the Company for guidance.
- Do not make posts or comments that may be considered defamatory, obscene, libellous, threatening, harassing or embarrassing to others.
- Before you post photographs of other people, get their permission first.
- Never use someone else's copyrights, copyrighted material, trademarks, service marks or other intellectual property.
- If you see comments relating to the Company that you think should be addressed, contact the Company for guidance.
- Do not use the Company's logo (in any form) on any personal social media platform. Use of any Company logo must be approved by the Company.
- Respect others in any online social interaction. Do not use social media or any similar form of communication to attack or insult the Company, fellow employees, customers, vendors, contractors, suppliers, competitors or others.
- Do not disclose any confidential, proprietary or sensitive information about the Company as well as names of our employees, customers, vendors, contractors, suppliers, competitors or others. Employees are reminded of Company's policy on public statements / media response.
- Do not comment on Company related legal matters, financial performance, competitors, strategy or rumours, unless you are specifically authorized to do so by the Company.
- If any member of the media (social or traditional) contacts you about your user-generated content (i.e., blog post, comment, video), a colleague's or another party, do not engage in a dialogue, but refer them to contact the Company.
- The Company expects all individuals to comply with this policy at all times and to protect the Company's reputation.

**Please be aware that violation of this policy may be grounds for disciplinary action up to and including termination of employment.**