

## SOCIAL MEDIA POLICY

### POLICY OVERVIEW

MARTUR FOMPAK INTERNATIONAL recognizes that social media is an effective tool for disseminating information and opinions with family members, friends and communities around the world and that it facilitates engagement in business and corporate matters.

However, the use of social media also presents certain risks and brings with it certain responsibilities. To guide employees to make responsible decisions about their use of social media, MARTUR FOMPAK INTERNATIONAL has a well-established policy.

This has been prepared to protect the interests of the group companies, its employees, suppliers and business partners, to ensure that references to MARTUR FOMPAK INTERNATIONAL or its affiliated companies do not breach confidentiality obligations and to otherwise ensure compliance with the Code of Conduct of MARTUR FOMPAK INTERNATIONAL.

The MARTUR FOMPAK INTERNATIONAL Group social media Policy applies to all employees who work for MARTUR FOMPAK INTERNATIONAL or/and its affiliated companies.

### WHAT IS SOCIAL MEDIA?

Social media includes all means of communicating or publishing information or content of any kind on the Internet and all forms of social computer use. Social media platforms take various forms, including but in no way limited to your or another person's blogs or microblogs (e.g. Twitter, Tumblr), content communities (e.g. YouTube, Instagram), networking pages social and professional (e.g. Facebook, Life, LinkedIn), forums and discussion boards (e.g. Google Groups), online encyclopedias (e.g. Wikipedia), and even social and gaming virtual environments (e.g. Second Life ).

The use of social media is growing and developing rapidly.

**So, this policy also applies to future uses of social media in whatever form they may appear.**

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**WHY DO WE NEED THIS POLICY?**

MARTUR FOMPAK INTERNATIONAL - and by extension, its employees - must **maintain** certain standards about what and how it communicates, both internally and externally.

The same principles and guidelines found in MARTUR FOMPAK INTERNATIONAL' policies, apply to online activities, including those related to social media.

Ultimately, **each individual is solely responsible for what they post online.**

Before creating content online, it is necessary **to consider the risks and rewards involved.**

**Keep in mind** that any of your behavior that negatively affects your job performance, the performance of co-workers, or negatively affects business partners, suppliers, or people working on behalf of MARTUR FOMPAK INTERNATIONAL or affiliated companies, may result in disciplinary action up to and including termination of employment.

**Inappropriate postings** that may include discriminatory remarks, harassment and threats of violence and similar inappropriate or illegal behavior or that disclose confidential information about MARTUR FOMPAK INTERNATIONAL, its business partners or suppliers and matters related to the work of its employees **will not be tolerated.**

**WHAT HAPPENS IF SOMEONE BREACH THE TERMS OF THIS POLICY?**

Failure to comply with this policy may result in disciplinary action against an employee or employees, up to and including termination of individual labor agreement.

It may also result in legal action by a third parties against any affiliates companies/ MARTUR FOMPAK INTERNATIONAL itself or one or more of its employees.

You can email any questions or comments to [corporate.communication@marturfompak.com](mailto:corporate.communication@marturfompak.com)

**DO NOT FORGET!**

**1. Respect**

Be unbiased and honest with your colleagues, business partners, suppliers and those working on behalf of MARTUR FOMPAK INTERNATIONAL or its affiliated companies.

Avoid the use of statements, photographs, video or audio materials that could reasonably be considered hostile, obscene, threatening or intimidating, that compromise colleagues, business partners or suppliers, or that could constitute harassment or intimidation. Examples of such conduct may include posts that are intentionally intended to damage someone's reputation or posts that could contribute to a hostile work environment because of race, sex, color, national or ethnic origin, class, religion, age, disability, marital status, sexual orientation

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or gender identification, political opinion, or any other status protected by applicable law or MARTUR FOMPAK INTERNATIONAL policy.

**2. If it's on the internet, it's available to the general public**

Remember that colleagues, business partner and suppliers often have access to the online content you publish.

As a best practice, MARTUR FOMPAK INTERNATIONAL recommends that employees set privacy settings for personal social media pages to the highest level of security.

**3. Don't breach the Confidentiality**

Keep confidential the trade secrets and private information of MARTUR FOMPAK INTERNATIONAL and its affiliated companies, as well as the confidential information of its business partners and suppliers. Trade secrets and proprietary information may include information related to the development of processes, products, services, expertise and technologies and financial results.

Do not publish pricing information, financial or operational information, reports, procedures, internal policies or other confidential internal communications related to the business, including business travel or meetings, information that is not otherwise in the public domain.

You also must not to publish any confidential information belonging to our business partners or suppliers that has not already been made public.

**4. Comply with financial non-disclosure laws/internal procedures**

Communicating or selling an insider "tip" to others to buy or sell something, including through social media, **is illegal and is forbidden.**

**5. Be transparent**

Identify yourself as an employee every time you link from your blog, your own website, or another social media page to MARTUR FOMPAK INTERNATIONAL website (or an affiliated company).

If MARTUR FOMPAK INTERNATIONAL (or one of its affiliated companies) is the subject of content you create, be clear and open about the fact that you are an employee of MARTUR FOMPAK INTERNATIONAL (or an affiliated company) and **clearly state that your views do not represent those** of MARTUR FOMPAK INTERNATIONAL or its affiliated companies, or its employees, business partners, suppliers, or people working on their behalf.

If you post content to a blog or online posting that relates to work you or MARTUR FOMPAK INTERNATIONAL (or its affiliated companies) do, **it is recommended to include a disclaimer such as:**

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***"The posts on this page are my own and do not necessarily reflect the views of MARTUR FOMPAK INTERNATIONAL or its affiliated companies."***

**6. Only authorized persons may act on behalf of the MARTUR FOMPAK INTERNATIONAL (or affiliated companies)**

MARTUR FOMPAK INTERNATIONAL has established through its own procedures who are the authorized persons who can speak/ communicate to media, analysts and shareholders etc. regardless of social media platforms.

**7. Acting as an individual**

**You are personally responsible** for the privacy and associated security risks of all posts and other communications made via social media.

**8. There is no way back**

Make sure you are honest and accurate when publishing information or news, and if you make a mistake, correct it immediately.

Be open about any previous posts that you have edited.

Remember that the internet **archives** almost **everything**. Consequently, even deleted posts can be searched. Never post any information or rumors that you know to be false about MARTUR FOMPAK INTERNATIONAL or its affiliated companies, employees, business partners, suppliers or competitors.

**9. Use of social media in the workplace**

**Avoid using social media** while on duty or on equipment provided by us, except when work-related, as permitted by your manager or in accordance with MARTUR FOMPAK INTERNATIONAL policies.

**Do not use** MARTUR FOMPAK INTERNATIONAL email addresses to register on social media, blogs or other online tools used for personal purposes.

**10. Whistleblower**

MARTUR FOMPAK INTERNATIONAL prohibits taking adverse action against any employee who has reported possible deviation from this policy for the purpose of cooperating in an investigation.

Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination of employment.

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**DO NOT DO THAT !**

The following is a list of recommended "**do not do that**" that should be read, understood and accepted in relation with this MARTUR FOMPAK INTERNATIONAL policy.

These things will be administered in accordance with all applicable laws and regulations.

**DO NOT USE** social media to bully, harass or discriminate against anyone, including co-workers, business partners, suppliers or other stakeholders;

**DO NOT POST** libelous content about MARTUR FOMPAK INTERNATIONAL' products, services or affiliated companies, and **DO NOT POST** libelous content about business partners, suppliers or competitors;

**DO NOT USE** and **PUBLISH** testimonials, videos, photographs (in part or/and in their entirety) of MARTUR FOMPAK INTERNATIONAL logos, trademarks or other MARTUR FOMPAK INTERNATIONAL property in postings that relate to MARTUR FOMPAK INTERNATIONAL projects, events, products and services, **unless such actions have been prior authorized by** MARTUR FOMPAK INTERNATIONAL.

**DO NOT RESPOND** to a negative or offensive post about MARTUR FOMPAK INTERNATIONAL products and services made by any third party, including business partners, customers, suppliers or competitors. Employees must refer all such instances to their local leadership/management or to the Corporate Communications Department, who will respond in accordance with the internal policies.

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