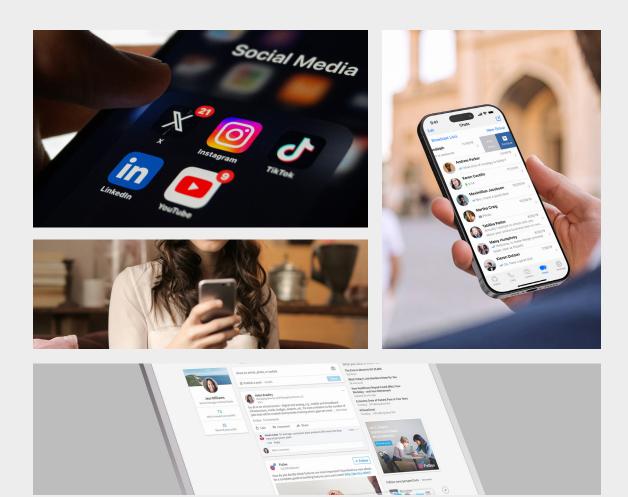


INTRODUCTION

At Seafrigo Group, we recognize the growing importance of social media in both professional and personal spheres. Platforms such as LinkedIn, Instagram, Facebook, YouTube, and others serve as spaces for interaction and information exchange that can directly impact the reputation of our company, our employees, and our partners. Therefore, it is essential that all employees, as well as external parties associated with our Group, understand and adhere to the rules governing the use of these media.

This policy aims to clarify Seafrigo Group's expectations regarding the use of social media, whether on professional or personal platforms, to ensure responsible use that aligns with the Group's values and objectives.

This policy takes effect on May 31, 2025.



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Persons concerned

This policy applies to all employees, both permanent and contractual, as well as anyone with a professional connection to Seafrigo Group, whether they are active, in probationary periods, interns, or on assignments within the company.

It also includes members of the management, managers, HR department teams, as well as subcontractors and partners of Seafrigo Group when they use social media in a professional context related to their activities on behalf of the company.

Policy objective

The purpose of this policy is to provide a clear framework for the use of social media by Seafrigo Group employees.

We aim to encourage the responsible use of these communication tools while safeguarding the Group's image, reputation, and values.

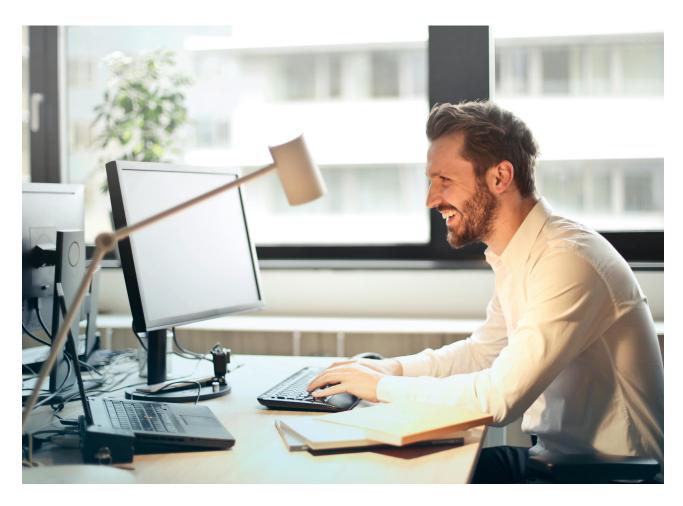


Definition of Social Media

Social media includes, but is not limited to:

- Professional networking platforms such as **LinkedIn**;
- Visual and interactive social networks such as Instagram and Facebook;
- Video-sharing sites such as YouTube;
- Any other website or application enabling the creation and sharing of online content (blogs, forums, podcasts, etc.).







Risks related to the use of Social Media

The use of social media entails several risks for Seafrigo Group and its employees. These risks include, but are not limited to:

Damage to Seafrigo Group's reputation:

Disseminating negative or false information about the company, its employees, or its partners.

<u>Example:</u> An employee posts a photo on Facebook of a minor incident that occurred in a Seafrigo warehouse, accompanied by negative comments about working conditions. Although the incident was isolated and quickly resolved, the post attracts the attention of other employees and partners, creating a negative image of the company and damaging its reputation.

Copyright and intellectual property rights infringement:

Use of copyrighted content without authorization, such as images, videos, or texts.

<u>Example:</u> An employee shares a blog article they find interesting on LinkedIn but fails to properly attribute the copyright. They include an excerpt from a published book without permission and without mentioning the original source. Such sharing could lead to legal action for copyright infringement and damage the company's professional image.

Disclosure of confidential information:

Revealing sensitive or confidential information about employees, clients, or company projects.

<u>Example:</u> A Seafrigo employee, during a conversation on Twitter, inadvertently mentions sensitive negotiations with a major supplier, disclosing confidential information about an ongoing contract. Although the intent was not to harm the company, the leak of confidential information can lead to legal and financial consequences.

• Harassing or discriminating on social networks:

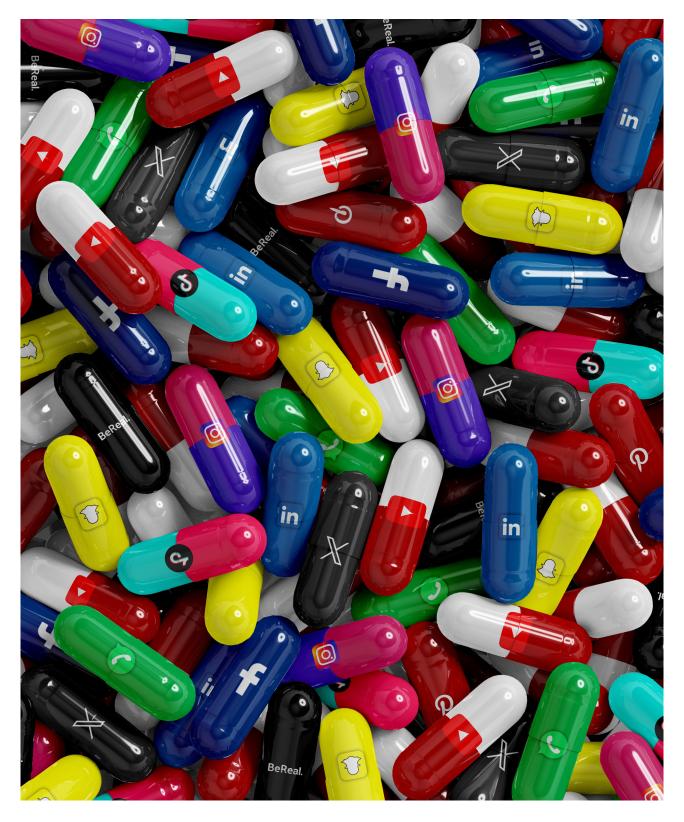
Participating in discriminatory or offensive discussions about other employees, partners, or clients.

<u>Example:</u> A team member visits a professional discussion forum to express their dissatisfaction with a particular colleague. They post disparaging and discriminatory comments about this person. Such behaviour can be perceived as harassment and can severely damage the work environment and the company's integrity.

• Confusion between personal and corporate opinions:

Confusing personal opinions with those of Seafrigo Group.

<u>Example:</u> An employee shares a political article on Instagram using a hashtag referencing Seafrigo Group. While unintentional, followers might perceive that the company endorses the employee's personal views on controversial topics, leading to confusion and potentially affecting the company's public image on external matters.





Guidelines for the use of Social Media

Seafrigo Group encourages its employees to use social media in a professional and respectful manner. Below are the essential guidelines that every team member must follow:

Representation of the Company

Employees must always demonstrate professionalism when posting content related to the company. Personal opinions should be clearly identified as such and must never be interpreted as representing the company's views.

<u>Acceptable Behaviour Example:</u> An employee shares an article on LinkedIn presenting Seafrigo Group as a leader in the logistics sector, accompanied by a positive comment on innovation in transportation services, while adhering to the company's editorial guidelines.

<u>Unacceptable Behaviour Example:</u> An employee posts a photo on Instagram from an internal company event with a sarcastic caption, giving a negative impression of the company and its values.

Respect for Confidentiality

Never disclose confidential or sensitive information about employees, internal projects, or business partners.

<u>Acceptable Behaviour Example:</u> An employee publishes an article on logistics industry trends without mentioning any unpublished internal projects or confidential details, while adhering to the company's guidelines.

<u>Unacceptable Behaviour Example:</u> An employee posts on Twitter an update about a strategic partnership which is still confidential, disclosing sensitive information before it is made public by the company.

Company Reputation

It is prohibited to publish content that is defamatory or could harm the reputation of the company, its executives, employees, or partners. <u>Acceptable Behaviour Example:</u> An employee professionally responds to a public comment on LinkedIn by highlighting a positive aspect of Seafrigo Group without engaging in debate or conflict, thereby maintaining the company's image.

<u>Unacceptable Behaviour Example:</u> An employee publicly criticizes a management decision or a supplier's product on Facebook, damaging Seafrigo's image and creating tensions with business partners.

Separation of Personal and Professional Content

Employees must maintain a clear distinction between their personal social media activities and those related to their employment at Seafrigo Group. <u>Acceptable Behaviour Example:</u> An employee publishes an article on LinkedIn about best logistics practices, while sharing photos of their vacation or personal hobbies on their Instagram account, without linking these posts.

<u>Unacceptable Behaviour Example:</u> An employee uses their LinkedIn profile to post political or personal opinions unrelated to their professional role, which may blur the distinction between their personal beliefs and their role as a Seafrigo employee.

Compliance with Laws and Values

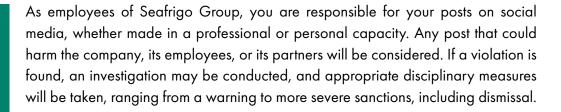
Use of social media must align with Seafrigo Group's values, including integrity, diversity, and inclusion. Employees are strictly prohibited from posting offensive, discriminatory, or demeaning content. Such behaviour is a violation of Seafrigo Group's core values and may result in disciplinary action.

Acceptable Behaviour Example: An employee shares an article on LinkedIn about sustainable advancements in the logistics industry, adhering to copyright laws and ensuring that no discriminatory or offensive content is published.

<u>Unacceptable Behaviour Example:</u> An employee posts an offensive or discriminatory statement on social media, attacking a colleague, partner, or competitor inappropriately, violating Seafrigo Group's values of inclusion and respect.



Employee responsability



It is the responsibility of each employee to ensure that their profile on professional social media platforms is updated, particularly upon joining the company, changing positions, or departing.



Use of Social Media during working hours

Professional use:

Employees may use social media for professional tasks related to their work, such as managing the company's social media accounts, communicating with clients, and other work-related activities.

Personal use:

Employees should limit personal use of social media during work hours. They are encouraged to use these platforms only during breaks and outside of work hours.



Confidentiality and data protection

Employees must respect the confidentiality of information they access in the course of their employment. Any unauthorized disclosure of confidential company or client information via social media constitutes a serious violation of internal policies and data protection laws.





Disciplinary procedures

Any violation of this policy will result in appropriate disciplinary measures, depending on the severity of the offense. These may range from a written warning to dismissal, based on the circumstances and consequences of the violation.





Policy review

This policy will be reviewed **annually** to ensure its relevance and effectiveness in light of evolving social media platforms and legal requirements. Early revisions may be made as necessary to address new challenges or regulatory demands.



CONCLUSION

At Seafrigo Group, we believe that social media can be a powerful tool to strengthen our professional relationships and enhance our brand image. However, it is crucial to use these platforms responsibly and in accordance with the company's standards. By adhering to this policy, we ensure the integrity of our organization and guarantee a positive experience for everybody.

For more information

Contact us at <u>communicationgroupe@seafrigo.com</u> if you have any questions or require further information.





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