

SOCIAL MEDIA POLICY



	Office	Date	Signature
EDITORIAL BOARD	HR	22/11/2022	
APPROVAL	GENERAL DIRECTION	22/11/2022	
CHECK/VERIFY	HR	25/11/2022	
CHECK/VERIFY	HR	29/11/2022	

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INTRODUCTION

The aim of the Ar-TEX Group Social Media Policy (SMP) is to define the policies and principles of behavior of the Ar-TEX Group, regarding ethics, respect of the laws and principles of civil coexistence

The document purpose is to:

- integrate the internal company regulation with the Code of Ethics already in force – which is completely referred to – and with behaviors related with social media
- protect the brand reputation;
- regulate conversations and interactions on social channels;
- define the methods of interaction with the community that is created around the brand;
- act as a guide for the recipients indicated below to align individual actions to the values of the Ar-TEX Group.

APPLICABILITY

The Social Media Policy applies to all employees of the Ar-TEX Group and to all subjects, called "Collaborators", who operate in any capacity with and for it by reason of a contractual relationship of employment, collaboration, work self-employment, contingency, tender or other similar formulas.

This Social Media Policy provides the main rules that individual Collaborators are required to observe whenever they publish, share or comment on content concerning the Company, whether this is part of their job and occurs through a company account, or when, through a personal account, they speak directly or indirectly of the Company's activity or of the role performed within it. (Law reference art. 2104, 2105 and 2106 Codice Civile).

APPROACH TOWARDS THIRD PARTIES

Collaborators have to be respectful towards all people and communities with whom they interact online and in relation to all situations in which Ar-TEX and/or one of its affiliates is directly or indirectly involved, in particular to respect the following (listed by way of not exhaustive example):

- **Ar-TEX values linked to the Code of Ethics** must be kept in mind and respected in all online interactions;
- **Opinions of third parties** – in any kind of comparison or debate – must be mentioned with respect;
- **Illegal material** (words or images conflicting with legal or contractual obligations) or material that could be perceived as embarrassing, offensive, harassing or defamatory of any person or entity must **never** be published;
- **Jokes or derogatory comments** based on or relating to gender, sexual orientation, race, ethnicity, age, marital status, religion, or any other cause of discrimination must never be published;
- all acts or declarations that may cause damage to the **company's reputation**, i.e. actions/words that negatively affect the actions of people that work in the Company, or that generate a decrease in the consideration by the associates with the Company interacts, must be avoided;
- all acts or declarations that may **damage the image, reputation or confidentiality and privacy** of third parties, according to the civil code (see for example art. 10) and of the Legislative Decree no. 196/2003 and of the EU Reg. n. 679/2016 (GDPR) must be avoided.

USE AND PUBLICATION OF CONTENT ON OFFICIAL ACCOUNTS OF THE COMPANY (EXTERNAL SOCIAL POLICY)

The official/company social media channels are managed by the Ar-TEX Marketing office, which has the tasks of:

- administering all the official social profiles of the Company
- monitoring the corporate reputation and that of its representatives on the social networks,
- evaluating the contents of posts and conversations in which the Company is mentioned through tag and hashtag.

The Company uses social media for institutional and general interest purposes to inform, communicate, listen, and encourage participation, discussion and dialogue with customers and stakeholders. The Company is currently active on the following social networks:

- LinkedIn;
- Facebook;
- Instagram.

Please send an email to marketing@Ar-Tex.it, if you find other accounts on the social platforms, different than those indicated above or "unofficial".

Ar-Tex Marketing office acts as moderator of the Company's official profiles and tries to foster a dialogue as constructive as possible and relevant to the topic of the post or tweet

Ar-tex marketing office has the responsibility to eliminate the off-topic, the out-of-context content and the invasive/inopportune comments in terms of third-party advertising (so-called spam) and promotional content. The Marketing office will make sure that the posts, comments and any other public interaction on the company bulletin boards do not come from false or anonymous profiles; in this case, it moves forward the prompt removal of these contents and also evaluates the possibility of using the so-called "user blocking" functions.

Furthermore, the moderators have to verify that the published contents are always in line with the communication strategy of the Company.

The contents of texts, photos and videos posted on the Company's social channels, at the time of publication, must meet the following requirements:

- offer a positive and truthful image of the Company (limiti di verità, continenza e pertinenza - Cassazione civile, sez. III, sentenza 08/05/2012 n° 6902);
- refer to topics, events, products of interest to Stakeholders (e.g. customers, suppliers, employees);
- comply with corporate policies and be in line with corporate values;
- **provide reliable and verified information.**

The contents relating to fairs/events/conferences must be texts/images/videos which provide current news at the time of publication or in the short term of the event mentioned.

Collaborators with preparing content on behalf of the Company must always ensure that the shared content:

- cannot be used by third parties against the Company, immediately or subsequently.
- do not spread personal data, confidential information, company material protected by property rights or by other regulations (for example, Legislative Decree no. 30/2005 industrial property code, law no. 633/1941 on copyright or in general the rules on distinctive signs, intellectual property and industrial inventions and competition).

Furthermore, in general, all Collaborators must (by way of example but not limited) to:

- avoid disclosing, through social media, confidential information or information that should be considered as such even if not expressly qualified as "confidential", such as email correspondence, information relating to third parties (for example partners, institutions, users, stakeholders, etc.) or information on work activities (services, projects and documents not yet made public and provisions relating to activities in progress); confidential information does not concern information that has already been disclosed to the public; the same goes for photographs and videos. It's in particular

forbidden to take photographs and videos that portray people, company premises, workstations, company assets and tools.

- always respect and protect the privacy of colleagues or representatives of the Company by
 - avoiding direct references to facts or details without public relevance and which damage the private life,
 - avoiding tagging people in photographs or posts without having first obtained their authorization and publish photos or videos of non-public events (for example "behind closed doors") or convivial evenings without the authorization of the filmed people and/or the organizers.

Furthermore, the publication of personal data (such as e-mail address, telephone number, etc.) and sensitive data is always prohibited;

- use the Company's logo or trademarks on social media only in compliance with company procedures and only with the prior authorization of the suitable office (Marketing Office);
- **refrain from opening blogs, pages or other channels in the name of the Company or that deal with topics related to Company institutional activities;**
- check, prior to publication, that the contents of what you intend to publish are correct. if there are any doubts about the answers to be given to users or about the contents to be published, please first discuss with the Marketing Department (marketing@Ar-TEX.it) or the Human Resources Department (risorseumane@Ar-TEX.it).

Collaborators, without prejudice to the exercise of trade union freedoms and in compliance to the right to criticize, must also refrain from the transmission and dissemination – through any channels at disposal – of messages or public statements that are offensive, disparaging, or abusive towards the Company or its employees, its activities and more generally its business.

USE AND PUBLICATION OF CONTENT ON PERSONAL ACCOUNTS (INTERNAL SOCIAL POLICY)

Collaborators, in all the circumstances referred to in the introduction and in relations with third parties, have to configure, use and manage their private accounts in compliance with behavioral criteria. They have to aim and defend the interests of the Company and of the people who work there, in according to the provisions of this Social Media Policy and to the company's internal regulations (including the code of ethics). Each collaborator of the Company is called to observe a public respectful behavior of this Social Media Policy. In particular, the responsibility for what is shared on social media is always personal; therefore, whenever the Collaborator participates in discussions that directly or indirectly involve Ar-Tex or one of its affiliates, he/she has to clarify that he/she is acting in a personal capacity and not on behalf of the Company.

If the contents of the private social profiles refer, directly or indirectly, to the activities of Ar-Tex, the Collaborator has to insert a disclaimer in profile information in which it is clear that the opinions expressed through that specific channel are personal and do not reflect or are in any way attributable to the official position of the Company. It is mandatory that the affixing of a disclaimer of this kind does not exonerate from compliance with the above obligations and related responsibilities.

The personal opinions of the Collaborators must be expressed in the way already indicated above.

Collaborators can:

- share the contents published by the company's official social channels on their private profiles;
- publish new contents relating to the Company, interfacing - before publication - with the Marketing office which manages the official accounts of the Company.

Collaborators may not (by way of example and not limited to):

- **spread on one's private profile content or information concerning the Company not previously reported on the official social channels and/or not communicated on the website or on other institutional sites of the Company;**
- publish on your personal profile any type of information or news that the Company discloses for internal use only;
- **transmit and disseminate messages**, within the limits of trade union freedoms and in compliance to the right to criticize, that may in any case harm the image and reputation of the Company;
- disclose through social media confidential information such as: internal correspondence, user information, institutions, stakeholders, or information on work activities, services, projects and documents not yet made public, decisions to be taken and measures relating to ongoing processes, before they have been officially approved and communicated to the interested parties;
- **use, on any social platform, never and in any context, phrases, words, thoughts and opinions that have an offensive, harmful, discriminatory and/or racist background based on gender, ethnicity, language, religious beliefs, political opinions, sexual orientation, age, personal and social conditions. The Company struggles and doesn't tolerate offensive, misleading, alarmist, illegal content or content that incites illegal, violent, incorrect or aggressive activities;**
- publish fake news concerning employment matters;
- refer on one's personal profiles to any qualification assumed within the company, other than that actually held at the moment (there must be correspondence with the job description/job description assigned).

The above applies to both social networks with open access, social networks with closed access, social networks with controlled access and messaging services with the same characteristics.

The personal use of social media during working hours is not permitted.

DISCIPLINARY SANCTIONS

In some serious cases, the violations of the aforementioned rules of conduct might be a source of criminal, civil and administrative liability in accordance with the law

In particular, the violation of these rules of conduct of SMP may determine the application of disciplinary sanctions according to the procedures set out in art. 7 of the Workers' Statute, the CCNL, the Civil Code (articles 2104-2105 of the Civil Code) and the Penal Code.

The Company will take care to inform promptly (in some serious cases, even without the need for prior disputes and/or formal charges) the public Authorities, if a crime is committed due to a use of social media against to the provisions by this Social Media Policy and by the civil and penal codes.

In particular, the worker may also incur criminally relevant cases, such as, by way of example but not limited to: disclosure of the contents of secret documents (art. 621 of the criminal code), disclosure of professional secrecy (art. 622 of the Codice Penale), disclosure of scientific secrets or commercial (art. 623 of the Codice Penale), violation of the Industrial Property Code (Legislative Decree 30/2005).

PROCESSING OF PERSONAL DATA

The collaborators personal data treatment respond to the Policies in use on the social platforms.

The Collaborators, at any time, may exercise the rights mentioned in art. 7 of Legislative Decree no. 196/2003 and the following articles of Reg. (EU) 2016/679: Art. 15 - Right of access, Art. 16 - Right of rectification, Art. 17 - Right of cancellation, Art. 18 - Right of limitation of treatment, Art. 20 - Right to data portability, Art. 21 - Right to object.

Everyone is invited to evaluate with the necessary attention the opportunity, in their social media actions, to insert or not, personal data, including the e-mail address, which may reveal their identity.

COMMUNICATIONS AND PERIODIC UPDATE

This Social Media Policy is published in our website and is notified to existing workers and new hires, directly or indirectly by the Company. In case of updates, the HR Office will send the latest document version to all interested people.

This Social Media Policy will be constantly updated on the basis of evolutions and relevant changes within the Company and also in consideration of the constant updates of the Social Networks. Updates will be communicated to all Collaborators, who are required to comply with the most updated version of this social media Policy.

FINAL TERMS

In case of conflict between the principles of this Social Media Policy and the other Corporate documents, the content of the Social Media Policy will prevail. In the event that a recipient of this policy identifies any inconsistency or overlapping of rules, each collaborator must immediately notify the Company (or the Marketing office - marketing@Ar-Tex.it or to the Human Resources Department – risorseumane@Ar-Tex.it) for the appropriate measures.

For further clarifications on the content of this Social Media Policy, Collaborators may contact the Marketing or Human Resources office who will provide support in this regard.

I declare that I have received a copy of the "Social Media Policy" in the version of 3rd January 2023 and that I have read and understood the contents of the same and that I am aware that I can ask for clarifications from the Marketing and/or Human Resources Department

Name and Surname: PAOLO BELLINI
Company/Role/Function: CEO AR-TEX GROUP
Date: 03/01/2023
Signature



AR-TEX
Ar-Tex S.p.A.

Name and Surname: LUCIANO VAVASSORI
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