

 ELBANA DI NAVIGAZIONE S.P.A.	HSSE Department		Page: 1 of: 2
	COMPANY POLICY SOCIAL MEDIA POLICY		Revision: 0
<small>Document may not be disclosed to any third party without the prior approval of the management.</small>			

With the rise of new media and next generation communications tools, the way in which Company employees can communicate internally and externally continues to evolve. While this creates new opportunities for communication and collaboration, it also creates new responsibilities for Company's employees and crew members.

Scope

This Social Media Policy applies to all Company employees and crew members who use sites such as (but not limited to) the following, whether or not they are accessed via Company equipment/networks and whether or not they are accessed during working hours:

- Multi-media and social networking websites such as MySpace, Facebook, Twitter, Yahoo! Groups and YouTube
- Blogs
- Wikis such as Wikipedia
- Discussion forums
- Internet relay or other chat sites

All of these activities are referred to as "Internet postings" in this Policy. Please be aware that violation of this policy may result in disciplinary action and even including termination of employment.

All Company Policies apply

Your Internet postings in which you disclose your relationship with Company should not violate any other applicable policy of Company, including (but not limited to) those set forth in the Company's Management System. You agree that Company shall not be liable, under any circumstances, for any errors, omissions, loss or damages claimed or incurred due to any of your Internet postings. Company reserves the right to suspend, modify, or withdraw this Social Media Policy, and you are responsible for regularly reviewing and the terms of this Social Media Policy.

Think before You Post

Use sound judgment and think before post anything on the Internet. Any post you make lives forever on the internet, even after you delete your copy of it. Avoid posting in the heat of the moment. Respect your audience. Avoid slurs, personal attacks, insults etc. Obviously stay away from illegal or objectionable subjects/content.

Confidentiality

Your Internet postings should not disclose any information that is confidential or proprietary to the Company or to any third party that has disclosed information to Company. Your postings should not reveal any information that gives Company competitive advantage. You should also respect copyright laws. You should not comment on any aspect of the Company's business or any policy issue in which the Company is involved.

Company employees shall not use on their personal Web sites stories, photographs or other work which directly result from and/or deal with their employment with Company. Employees shall not allow Company images or other material to be used by any third party for any purpose without permission from Company.

Postings Written By / About Other Company Employees

In addition, Company employees shall not circulate postings they know are written by other Company employees without informing the recipient that the author of the posting is a Company employee. Your Internet posting should reflect your personal point of view, not necessarily the point of view of Company. Company may request that you avoid certain subjects or withdraw certain posts if it believes that doing so will help ensure compliance with applicable laws, including securities regulations.

Created by: HSSE Department Date: 15 November 2018	Checked by: Designated Person Ashore Date: 15 November 2018	Approved by: Managing Director Date: 15 November 2018	Reference: IMO Resolution A.741 (18), as amended. Cross reference: SMS Manual
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Company employees must not include discussions about Company personnel, policies or operations in their Web sites and/or blogs. Co-workers must not be identified by name and their images shall not be posted in video, photographic or graphic form without their permission. If employees later request that the material be removed then that request must be honoured.

When posting your point of view, you should neither claim nor imply you are speaking on Company's behalf. If you identify yourself as a Company employee on any Internet posting, refer to the work done by Company or provide a link on a Company website, you are required to include the following disclaimer in a reasonably prominent place: "the views expressed on this post are mine and do not necessarily reflect the views of Company ." Your Internet postings shall not include Company's logos or trademarks, and shall respect copyright, privacy, fair use, financial disclosure, and other applicable laws.

Responsibility / Liability

Because you are legally responsible for your postings, you may be subject to liability if your posts are found defamatory, harassing, or in violation of any other applicable law. You may also be liable if you make postings which include confidential or copyrighted information (music, videos, text, etc.) belonging to third parties. All of the above mentioned postings are prohibited under this policy.

Inquiries

If a member of the news media or blogger contacts you about an Internet posting that concerns the business of Company, please refer that person to the Managing Director.

This policy is not intended to create any employment relationship or contractual rights in favour of the employee or the Company. Company reserves the right to change the terms of this policy at any time.

Managing Director

Fabrizio Freschi

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