

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

**Elbana di Navigazione** recognizes the value of social media and expects everyone to use these tools responsibly, protecting Company’s reputation.

We understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, the use of social media also presents certain risks and carries with it certain responsibilities.

The Policy applies to multi-media, social networking websites, blogs and wikis for both professional and personal use, using (but is not limited to) the following technologies:

- |                                      |                                   |
|--------------------------------------|-----------------------------------|
| <input type="checkbox"/> Youtube     | <input type="checkbox"/> Linkedin |
| <input type="checkbox"/> Facebook    | <input type="checkbox"/> TikTok   |
| <input type="checkbox"/> Instagram   | <input type="checkbox"/> Snapchat |
| <input type="checkbox"/> TripAdvisor | <input type="checkbox"/> Twitch   |
| <input type="checkbox"/> Pinterest   | <input type="checkbox"/> Reddit   |
| <input type="checkbox"/> Twitter     | <input type="checkbox"/> Tinder   |
| <input type="checkbox"/> WhatsApp    | <input type="checkbox"/> Skype    |
| <input type="checkbox"/> Messenger   | <input type="checkbox"/> QQ       |
| <input type="checkbox"/> Weibo       | <input type="checkbox"/> QZone    |

*To assist individuals to responsible use of social media, the company has established the below guidelines:*

Use good judgement and common sense. Readers of social media sites will include customers, potential customers, suppliers and competitors, as well as colleagues.

The following items, unless you are specifically authorized to do so by the Company, are strictly prohibited from social media content, or from any form of unauthorized a discloser, in the first instance:

- Never publish inaccurate information regarding the Company online
- Future vessel movements
- Any imagery, information, data etc., relevant to any incident, technical failure, involving the Company’s managed vessels, facilities or people must remain confidential and must not be distributed.
- Don’t publish on any social media accounts, or the internet, any content, text picture relating to Company or vessel operational matters.
- Don’t make posts or comments that may be considered offensive, obscene, threatening, harassing or embarrassing to others.
- Never use someone else’s copyrights, copyrighted material, trademarks, service marks or other intellectual property.
- Client data
- Only post online what you would be comfortable saying to people in person or in public. Would you be happy for your children, your parents or your boss to read your comments?
- As in any form of electronic communication, the exchange or storage of indecent, pornographic or illegal material is strictly prohibited through or on Company provided hardware and software platforms.
- Do not use the Company’s logo (in any form) on any personal social media platform, unless approved by the Company Management.
- Posts or comments that may be considered defamatory, obscene, granted, libellous, threatening, harassing or embarrassing to others
- Respect others in any online social interaction. Do not use social media or any similar form of communication to attack/insult the Company’s employees, customers, vendors, contractors, suppliers, competitors or others.
- Do not comment on Company related legal matters, financial performance, competitors, strategy or rumors, unless you are specifically authorized to do so by the Company Management.
- If you are unsure of the accuracy of your comments, do not publish them
- If you see comments relating to the Company, that you think should be addressed, contact the DPA for guidance.

Individuals are themselves responsible for using their time off-duty so that they are rested and can do their work properly. Limit use of social media to ensure safety is not compromised through fatigue.

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 parties, do not engage in a dialogue and refer them to the DPA.

Be accurate and honest. If you are in doubt or uncertain about how to respond to a post, contact the DPA for guidance.

Managing Director

Fabrizio Freschi

Created by: HSSE Department Date: 01 <sup>st</sup> January 2023	Checked by: Designated Person Ashore Date: 01 <sup>st</sup> January 2023	Approved by: Managing Director Date: 01 <sup>st</sup> January 2023	Reference: IMO Resolution A. 741 (18), as amended. Cross reference: SMS Manual
---	--	--	---