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# **A.S. Watson Group**

## **Policy on Use of Social Media**

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## ASW Policy on Use of Social Media

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### 1. INTRODUCTION

Today, social media has shifted how businesses interact with their customers, as well as each other. The numbers of people on social networking sites are staggering. ASW recognises the importance of participating in these interactions and is committed to ensuring that we participate in the right way.

Used responsibly, social media can be a valuable and effective tool to showcase the diverse range of ASW brands globally. However, unless it is used properly social media can also pose risks to ASW's confidential and proprietary information, our reputation and can jeopardise compliance with legal obligations.

#### 1.1 Purpose

The purpose of this Policy is to encourage the responsible use of social media by Employees and to help empower our business units' ("BU") representation in this new communications medium, and share the optimistic and positive spirits of our brand. It also aims to minimise risks, to avoid loss of productivity and to set clear principles for participation in social media by all Employees.

#### 1.2 Scope and Application of the Policy

- (a) This Policy applies to all Employees. Each BU should ensure the Policy is incorporated into its local policies and procedures, as far as local legislation and practice allows. The Head of Marketing and/or Public Relations (PR) in each BU is responsible for the maintenance of and compliance with this Policy for the business use of social media.
- (b) This Policy covers all forms of social media (i.e. web and digital technologies that enable social interaction) including:
  - blogs (including corporate and personal blogs, as well as comments);
  - social networking sites;
  - video and photo-sharing platforms;
  - forums, networks and discussion boards;
  - wiki-based resources such as Wikipedia; and
  - all other websites (including company and personal).
- (c) This Policy applies to the use of online social media for both business and some personal purposes, whether during office hours or otherwise, and regardless of whether the social media is accessed using ASW's IT facilities and equipment or Employees' personal equipment. Section 3 addresses personal use; section 4 covers business use; and section 5 sets out general guidelines and recommendations for use of social media. Please note section 6 on monitoring of the use of ASW's IT systems. Appendix A sets out guidelines for the use of social media for marketing purposes.



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(d) Social media must not be used in a way that breaches any of the ASW Group's policies or procedures. If a communication or internet post would breach any of our policies in another forum, it will also breach them in an "online forum". In particular, employees are reminded that use of social media must in particular comply with the following Group policies and procedures:

- Human Resources Policy;
- Code of Conduct;
- Policy on Personal Data Governance;
- PR Policy ; and
- any other applicable policies.

### 1.3 Use of the Policy

If you have questions about any part of this Policy, or any related matter, please contact the Group Public Relations Department (GPR) via email (GroupPR@aswatson.com). Your enquiry will normally be attended to and replied within 24 hours on working days.

### 1.4 Breach of the Policy

(a) Breach of this Policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether the breach is committed during office hours, and regardless of whether ASW's IT facilities or equipment are used for the purpose of committing the breach. Any Employee suspected of committing a breach of this Policy will be required to co-operate with ASW's investigation. This may involve handing over relevant passwords and login details relating to the Group's online social media. Misuse of the internet in accordance with this Policy may mean any access is withdrawn.

(b) Employees may be required to remove internet postings which are deemed to constitute a breach of this Policy. Failure to comply with such a request may in itself result in disciplinary action.

## 2. PERSONAL USE OF ONLINE SOCIAL MEDIA

2.1 The Group fully respects the interests and rights of our Employees in the use of online social media in a personal capacity. However, such activity that may affect job performance or pose risks to the Group's business interests is not encouraged. (Please also refer to section 5 of this Policy.)

2.2 Occasional personal use of social media in the office or by means of the Group's computers or networks is permitted so long as it is kept to a minimum, is done in Employees' own time and does not interfere with Employees' productivity or employment responsibilities.



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### **3. BUSINESS USE OF ONLINE SOCIAL MEDIA**

- 3.1 It is critical that we always remember who we are (one of the leading health, beauty and lifestyle retailers in the world) and what our role is in the social media community (to build our brands). The same rules that apply to our messaging and communications in traditional media still apply in the online social media space.
- 3.2 All BUs need to submit a request for approval of designated online spokesperson(s) to ASW Group Managing Director via GPR. For example, the designated spokesperson for the BU online could be the Marketing Department; the designated department to handle employer's and Employees' communications using social media would be the People Department. Occasionally if a marketing campaign requires the use of social media by Employees other than the designated department, such as store managers, approval by BU Head should be obtained and the relevant BU directions regarding such marketing activity should be followed. The owner of the social media should provide contents regularly (at least once a week) and update company information (once a quarter) whenever necessary.
- 3.3 BUs may allow their stores to use local store based social media pages, which can serve as a good means of customer engagement. If they do allow store based social media pages, the BU must provide clear guidelines to stores regarding the correct way to set up and maintain the pages and the appropriate usage (in terms of logo, images and content).
- 3.4 Any Employees who are expected or encouraged as part of their duties to use social media on behalf of ASW or their BU, for example for marketing or recruitment purposes, must comply with the Appendix to this Policy ("Use of Social Media for Marketing Communications").
- 3.5 If Employees are contacted for comments about the Group for publication in any social media, these requests must be directed to the relevant BU PR Department(s). Only designated PR representatives are authorised to communicate with the media, whether online or off-line.
- 3.6 If any BU is uncertain or concerned about the appropriateness of any statement or posting relating to ASW, its customers, suppliers or other business partners, they should seek guidance from GPR.

### **4. RESPONSIBLE USE OF ONLINE SOCIAL MEDIA**

Employees should follow the common-sense guidelines and recommendations below for using social media responsibly and safely.

In this section, "you" refers to each individual Employee.

- 4.1 Protecting ASW's business reputation and your own
  - (a) Do not post disparaging or defamatory statements including about:
    - ASW or its stakeholders;
    - other Employees;
    - Customers;



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- suppliers;
  - any other business partners; or
  - competitors.
- (b) Unless specifically authorised to represent ASW on social media, you should make it clear that you are speaking on your own behalf. Write in the first person and use a personal e-mail address or profile/account.
- (c) You are personally and legally responsible for what you communicate in social media.
- (d) Remember that what you publish might be available to be read by the masses (including ASW itself, future employers and social acquaintances). Keep this in mind before you post any content.
- (e) If you disclose your affiliation with ASW, you must also state that your views do not represent those of your employer. For example, you could state, "the views in this posting are my own and do not represent the views of my employer". The only exception to this is for BU-initiated communications, such as a marketing campaign where Employees share news on promotions via their own social media identity. (Please refer to the Appendix to this Policy regarding Use of Social Media for Marketing Communications.)
- (f) The dividing line between public and private, personal and professional, is blurred in social media and so you should ensure that your profile and any content you post are consistent with the professional image you present to customers, suppliers and colleagues.
- (g) If you see content in social media that disparages or reflects poorly on ASW or its stakeholders, you should report it to your BU's PR Department or GPR as appropriate. All Employees are responsible for protecting our business reputation, but any responses to negative online comments should be channelled through the designated PR representative.

### 4.2 Respecting intellectual property and confidential information

- (a) You should not do anything using social media which might jeopardise ASW's confidential information and intellectual property.
- (b) You must never disclose or use confidential information or intellectual property of ASW in any social media platform.
- (c) You must not use the Group's logos, brand names, slogans or other trade marks, without prior written permission from the Head of the relevant BU Marketing Department.
- (d) You must comply with all copyright, privacy and other intellectual property laws. In particular you should:



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- obtain approval from GPR before reproducing any ASW trade marks or materials online. The same applies to other third-party social media / digital contents which uses ASW trade marks; and
- credit your sources when posting a link or information from another source.

### 4.3 Respecting your audience

- (a) Do not post anything that colleagues, customers, suppliers, business partners or other stakeholders would find offensive, including discriminatory comments, threats, insults or obscenity.
- (b) Always use your best judgement and be civil and respectful to others.
- (c) Do not identify your colleagues, customers, suppliers or other business partners without their permission.

## 5. MONITORING

5.1 The ASW IT systems and their contents are company property. Therefore, Employees should have no expectation of privacy in any social media post, conversation or message, or any other kind of information or communication transmitted, received or stored on ASW's electronic information and communications system. Employees are advised not to use social media for any matter intended to be kept private or confidential.

5.2 To the extent permitted by local law, and subject to any other local notices or policies, ASW reserves the right to monitor Employee activities using the company's IT systems, including but not limited to social media postings and activities for legitimate business purposes, to ensure Employee compliance with ASW's policies and procedures. Such monitoring will be carried out in line with the ASW Group Policy on Employee Monitoring.



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### APPENDIX A: USE OF SOCIAL MEDIA FOR MARKETING COMMUNICATIONS

This Appendix sets out guidelines for Employees who use social media for marketing communications and other business purposes in connection with ASW's business.

It applies to all Employees who are expected or encouraged as part of their duties to use social media in connection with ASW's business, for example for marketing or recruitment purposes.

The social media we use for marketing communications and other business purposes enables us to engage with our Customers and those new to the brand. It also enables us to publicise new launches, special offers and competitions.

Set out below are the key principles which apply to the use of social media, some specific rules and how to deal with adverse comments.

#### 1. KEY PRINCIPLES

The following key principles should be followed in using social media for marketing and other business communications:

- 1.1 *Protection* – protect consumer privacy. This means being conscientious regarding any Personal Data collected, including how we collect, store, use, or share the data, all of which should be pursuant to the ASW Group Policy on Personal Data Governance and local privacy laws applicable in the relevant country.
- 1.2 *Respect* – respect for third party rights. This means being cognisant of copyright, trade marks, other intellectual property or other third-party rights in the online space, including with regard to user-generated content. Do not claim authorship of any third party content, and make due acknowledgement when using other's content with their consent. We should work with cross-functional teams as appropriate depending on the particular situation to make informed and appropriate decisions. Any questions about whether a particular post or upload might violate anyone's copyright or trade mark, should be directed to the Group Legal Department or the relevant BU Legal Department before proceeding.
- 1.3 *Responsibility* – be responsible in our use of technology. Do not use or align ASW or any of its BU's with any organisations or websites that deploy the use of excessive tracking software, adware, malware or spyware. Be responsible also in ensuring that content uses correct facts and information.
- 1.4 *Utilisation* – use best practices, listen to the online community, comply with applicable regulations to ensure that these key principles remain current and reflect the most up-to-date and appropriate standards of behaviour.

#### 2. SPECIFIC RULES

- 2.1 All content posted on social media must comply with the laws, regulations and codes of practice for marketing and communications in the relevant jurisdiction.



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- 2.2 If we incorporate or embed a third party application on one of our own websites or any other official domain, we should take the necessary steps to disclose the third party's involvement and describe the activities in the relevant website privacy policy.
- 2.3 If we post a link which leads to a third party website or any other location that is not part of an official ASW domain, we should provide an alert to the visitor, such as a statement adjacent to the link or a "pop-up", explaining that visitors are being directed to a non-official website that may have different privacy policies from our own website
- 2.4 We may use different social media platforms to connect with the public, but we should also ensure that the public can obtain comparable information and services through the official website or other official means without having to join a third-party social media platform. In addition, if we use a third-party service to solicit feedback, we should provide an alternative email address where users can also send feedback.

### 3. USE OF A THIRD PARTY PLATFORM OR APPLICATION

Where use of social media involves using a **third-party platform** or application as a tool for communication and interaction with the public, the following should be checked as a basic requirement:

- 3.1 *Third party privacy policies* – before a BU uses any third party website or application to engage with the public, the BU should examine the third party's privacy policy to evaluate the risks and determine whether use of the platform or application is appropriate. In addition, the BU should monitor any changes to the third party's privacy policy and periodically reassess the risks. Any questions regarding such privacy policy should be directed to the BU's Legal Department.
- 3.2 *Branding* – when a BU uses a third party website or application that is not part of an official BU domain, the BU should apply appropriate branding to distinguish the BU's activities from those of the third party platforms or applications.
- 3.3 *Information Collection* – if information is collected through a third party platform or application, the BU should only collect the information necessary for the proper performance of the BU's activities and which has practical utility. If Personal Data is collected, we should collect only the minimum necessary to accomplish the required purpose, and to abide by ASW's Policy on Personal Data Governance.
- 3.4 *Third party terms of use* - before a BU uses any third party website, application or platform, the BU should check the applicable terms of use and comply thereto.

### 4. ADVERSE COMMENTS

- 4.1 We encourage our customers to provide honest feedback and comments via social media. However, whilst we respect and appreciate differing and varied opinions, we must always consider the reputation and image of ASW.
- 4.2 ASW has the right to delete disruptive, profane or offensive content and comments, and there should be a set of house rules explained for the administrator to moderate accordingly. We may also block users who repeatedly post such content. Content that will be deleted or blocked include:



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- (a) Profane, defamatory, offensive or violent language;
- (b) "Trolling", or posting deliberately disruptive statements meant to hijack comment threads or throw discussions off-track;
- (c) Attacks on specific groups or any comments meant to harass, threaten or abuse an individual;
- (d) Hateful or discriminatory comments regarding race, ethnicity, religion, gender, disability, sexual orientation or political beliefs;
- (e) Links or comments containing sexually explicit content material;
- (f) Discussion of illegal activity;
- (g) Spam, link baiting or files containing viruses that could damage the operation of any computers or mobile devices;
- (h) Acknowledgement of intent to stalk an individual or collect private information without disclosure;
- (i) Commercial solicitations or promotion of a competitor;
- (j) Violations of copyright or other intellectual property rights;
- (k) Content that contains confidential business information;
- (l) Content we determine to be inappropriate, in poor taste, or otherwise contrary to the purposes of the forum;
- (m) Promoting competing products, services, or brands; or
- (n) Personal promotion.