

Social Media Policy

Purpose

This policy outlines the expectations of Hamilton Island Enterprises Limited, Hamilton Island Shared Services Pty Ltd and all other subsidiaries and related entities (**HIE**) with respect to the Publication of content, opinion or other contributions on Social Media particularly where there is an identifiable connection to Hamilton Island.

HIE supports the appropriate use of Social Media by HIE Employees. If Employees wish to engage in Social Media they are expected to protect the Hamilton Island brand and reputation and adhere to the Hamilton Island Code of Conduct.

Scope

This policy applies to all Employees of Hamilton Island Enterprises Limited and Hamilton Island Shared Services Pty Ltd.

Definitions

For the purposes of this policy, the following terms have the following meanings:

Hamilton Island	Anything related to or associated with the operation of Hamilton Island Resort including but not limited to its accommodation, activities, events, guests, visitors, residents, employees and the owners.
HIE	Hamilton Island Enterprises Limited, Hamilton Island Shared Services Pty Ltd and all other subsidiaries and related entities.
CEO	The Chief Executive Officer of Hamilton Island Enterprises Limited.
Employee	An employee of Hamilton Island Enterprises Limited or Hamilton Island Shared Services Pty Ltd and as defined in the Hamilton Island Rules and Regulations and Hamilton Island Code of Conduct.
On Duty	When an Employee is performing work for or on behalf of HIE.
Publication	A book, journal, document or piece of music for public consumption, be it free-to-view or for sale.
Social Media	<p>Websites and digital applications that allow users to create and share content and to participate in social networking, which include but are not limited to:</p> <ul style="list-style-type: none"> • social networking sites, including Yammer, Facebook, LinkedIn or Google+ • video and photo sharing websites, for example Snapchat, Flickr, Instagram, YouTube and Pinterest • social bookmarking sites, for example Digg and Delicious • corporate networking tools, such as SharePoint or Enterprise Jungle • media sites hosting articles with comments, for example newshub • blogs and micro-blogging sites, for example Twitter, Yammer and Tumblr • forums and discussion groups, Google groups or Whirlpool • wikis, for example Wikipedia • podcasting sites, for example SoundCloud • online gaming platforms, for example World of Warcraft or Second Lifegeo-spatial tagging, such as Foursquare and Facebook check-in • personal blogs or social platforms hosted by individuals

Policy

Use of social media while On Duty

Employees are not permitted to use Social Media while On Duty, except with the express permission a manager or supervisor.

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Personal use of social media

HIE supports Employees who choose to use social media in their capacity as individuals, however they should be aware that any content published on social media sites is publicly available, even on their personal accounts. As such, Employees should be aware that their behaviour and actions while using these platforms (even in a personal capacity and/or outside of work hours) are bound by the Hamilton Island Code of Conduct and Rules & Regulations and their contract of Employment. With this in mind, Employees must ensure that at all times, even on their personal social accounts their:

- posts/comments/photos/videos/reels are not obscene, defamatory, threatening, harassing, discriminatory or hateful to their workplace, job, or any other person on or, guest of Hamilton Island or HIE
- posts/comments/photos/videos/reels are not or could not be perceived to be:
 - Made on behalf of HIE, or could be viewed by another person as representing HIE.
 - So harsh or extreme in their criticism of HIE or a guest of Hamilton Island that they raise questions about their capacity to work professionally, efficiently or impartially as an HIE employee (such comments would not have to be in relation to their work).
 - An unwarranted personal attack connected with their employment in any way.

The speed and reach of online communication means that comments posted online are available immediately to a wide audience. Material online effectively lasts forever, may be replicated endlessly, and may be sent to recipients who were never expected to see it, or who may view it out of context. If any comments are deemed to be in breach of HIE's Code of Conduct and Regulations Employees will be directed to remove it immediately and in certain circumstances may be terminated immediately from their employment.

Questions to consider when making personal contributions on Social Media

When considering making personal comments employees should consider the following questions:

- Could the comments reasonably be expected to cause HIE to lose confidence in the Employee's ability to work in an impartial and professional manner?
- Would a comment of this kind be likely to lower or undermine the reputation of HIE?
- Are these comments in line with how the community in general expects HIE and their Employees to operate and behave?
- Are these comments lawful? For example, do they comply with anti-discrimination legislation and laws relating to defamation?
- Would you be comfortable if your Manager or General Manager read your comments?
- Do your comments respect the privacy of HIE guests, residents and other Employees?
- Does your post or comment contain unauthorised use of the Hamilton Island logo and/or branding?

Personal privacy and security online

If you identify yourself as an Employee of HIE on Social Media, you should be aware that this information is searchable, even by people who are not your 'friends' or 'followers' online.

Employees should familiarise themselves with the terms and conditions and privacy notices of the Social Media sites they use, and adjust their privacy settings according to their own needs and to ensure HIE is protected at all times.

Employees should not rely on a site's security settings for a guarantee of privacy, as material posted in a relatively secure setting can still be copied and reproduced elsewhere. Comments posted on one site can also be used on others under the terms and

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conditions of many social media sites. HIE Employees must uphold the HIE Code of Conduct and Rules & Regulations even when material is posted anonymously, or with an 'alias' or pseudonym. You should bear in mind that even if you do not identify yourself online as a HIE Employee you could nonetheless be recognised as such.

As a rule of thumb, irrespective of the forum, anyone who posts material online should assume that at some point their identity and the nature of their employment will be revealed. Social media websites are public forums, so inappropriate public comment on such sites could put Employees at risk of breaching the HIE [Code of Conduct](#) and [Rules & Regulations](#). If Employees have concerns relating to their employment, they can seek advice from their line manager or the People, Culture & Development Team at employeerelations@hamiltonisland.com.au.

Breaches of the policy

As a member of HIE your behaviour, both in and out of the workplace, must be in line with the HIE [Code of Conduct](#) and [Rules & Regulations](#). It is important to understand that failure to adhere to HIE's [Code of Conduct](#) and [Rules & Regulations](#) can result in disciplinary action, up to and including termination of employment. This applies to all use of social media, whilst on duty or not.

Examples of failure to adhere to the Code of Conduct and Rules & Regulations in a social media setting include, but are in no means limited to a HIE Employee:

- making derogatory and obscene post about their manager on Facebook. They are not Facebook 'friends' with their manager, but they happen to have mutual friends.
- Tweeting derogatory comments about an HIE guest(s) from their personal Twitter account.
- taking a photo of themselves in a compromising situation and posting it on their personal Instagram page, and referencing Hamilton Island in the post.
- making a discriminatory post/comment in a community Facebook page, which is traced back to HIE as they have identified themselves as working for a HIE business in their profile or business association of their recent posts.
- making a post on social media that shows unfavourable pictures of Hamilton Island, which leaves guests feeling unsure of their holiday plans.

Reporting compliments and criticism

If you come across positive or negative remarks about the HIE or Hamilton Island or its brands online that you believe are important, consider sharing them by forwarding them to pr@hamiltonisland.com.au.

Subject to change

This policy is subject to change and HIE reserves the right to vary, replace or amend it at any time. This policy does not comprise a term or condition of an Employee's employment with Hamilton Island Enterprises Limited or Hamilton Island Shared Services Pty Ltd, and does not create any contractual rights on the part of any Employee or impose any contractual obligations on Hamilton Island Enterprises Limited or Hamilton Island Shared Services Pty Ltd.

Document approval

Approved by: General Manager People, Culture & Development

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