


| POLICY MANUAL | | | | |
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|  | SOCIAL MEDIA | | | |
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I. POLICY STATEMENT

MIESCOR BUILDERS INC. (“MBI” or the “Company”) recognizes the value of social media in disseminating relevant information about the Company’s business and in strengthening brand awareness and stakeholder engagement. However, the use of social media may involve serious reputational and operational risks and therefore, should be guided by standards that ensure fairness, accountability, integrity, transparency and honesty as well as professionalism and confidentiality whenever appropriate.

II. PURPOSE AND SCOPE

This Social Media Policy prescribes the standards of the Company in relation to the use of online platforms of communication or social media to safeguard the Company’s interest and that of all its stakeholders.


This covers the Company’s Directors, Officers, and Employees of the Company in their online social media usage.

III. DEFINITION OF TERMS

1. **Organization/ Organization Levels (“OL”)** refers to defined reporting relationships based on organization charts/boxes and a position’s distance from President and CEO as follows (MBI Guidelines on the Definition and Use of Organization Levels and Job Grades):

| ORG LEVELS | ORGANIZATION / EMPLOYEE |
|-------------|--|
| Org Level 1 | All Direct report organizations of the President and CEO |
| Org Level 2 | All Direct report organizations of the Level 1s |
| Org Level 3 | All Direct report organizations of the Level 2s |
| Org Level 4 | All Direct report organizations of the Level 3s |

2. **Clearance Authority** refers to personnel in leadership positions in charge of evaluating situations to check for conflict of interest, determining permissibility and issue proper guidance to concerned Directors, Officers, or Employees.
3. **Confidential or Proprietary Information**¹ shall include, but shall not be limited to, any and all trade secrets and any other information, methods, processes, formulae, systems, business, technical, marketing, computer and administrative records, including customer lists, plans, software and other data developed, created, acquired or maintained by the Company.
4. **Personal Information** refers to any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly

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ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual. For purposes of this Policy, Personal Information shall cover information in the custody of and obtained by the Company within the scope of the Company's business objectives, such as, but not limited to, name address, email address, phone number, race, nationality, ethnicity, origin, color, religious or political beliefs or associations, age, sex, marital status, information on education, health, financial, or employment history.

5. **Conflict of interest** refers to a situation where financial or business interest, professional, or other personal considerations or interests that may influence, jeopardize or compromise, or have the appearance, tendency, or propensity of influencing, jeopardizing or compromising the ability of Directors, Officers or Employees to effectively and impartially or objectively exercise independent judgement in the performance of their duties, responsibilities or professional activities in the Company.
6. **Social Media** are various online tools, applications, and sites where users are able to generate files, share content, join networks or promote advocacies, brands or causes.


IV. GENERAL GUIDELINES

A. CONFIDENTIALITY OF INFORMATION AND PROPER USE OF COMPANY PROPERTY

1. It is incumbent upon the Directors, Officers, and Employees to act responsibly with the information, privileges, and resources they are entrusted with.
2. Confidentiality of proprietary information and personal information of Directors, Officers and Employees of the Company shall be safeguarded and maintained. Appropriate penalties shall be meted out in the event of unauthorized use or dissemination of proprietary and/or personal information. Company property, proprietary and/or personal information shall be protected against abuse, loss or theft.

B. SOCIAL MEDIA USAGE

1. Directors, Officers and Employees should adhere to Company policies such as Code of Business Conduct and Ethics, Information Security, and Code on Employee Discipline when using social media either officially or personally. In line with this, Directors, Officers and Employees should present themselves on social media in a manner that is consistent with that in the corporate world or his dealings with stakeholders and should presume that every post, message or exchange on social media is public. Accordingly, Directors, Officers and Employees shall:
 - a. Avoid communications that are defamatory or vexatious, or remarks that would contribute to a hostile work environment as well as any online behavior not conforming to the Company's ethical principles and core values.
 - b. Comply with the established rules on attribution and avoid infringement of copyright, trademark and other intellectual property rights.

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- c. Refrain from publishing or posting comments related to the Company's financial information, management changes or initiatives, lawsuits, shareholder affairs, human resource practices, and contracts with business partners, customers, suppliers and other stakeholders unless authorized.
2. Directors, Officers and Employees shall be liable in their personal capacity for any content published, shared or posted in social media without proper authority or in violation of existing laws or internal policies, standards and procedures.
3. Directors, Officers and Employees shall avoid using the Company's resources for personal or non-Company activities or for purposes outside of the Company's corporate mission/vision. As such, personal use of social media should not be conducted during Company time.
4. Directors, Officers and Employees, nonetheless, are encouraged to participate in various Company-sponsored social media applications, sites and tools which are aimed to measure the rate of stakeholder engagement, improve brand perception and implement advisories/crisis response protocol.
5. Directors, Officers and Employees are encouraged to report to Human Resources and Corporate Services any negative remarks as well as inaccurate or false information about the Company or its products and services.
6. Directors, Officers and Employees communicating officially or on behalf of the Company shall be required to disclose their name and affiliation with the Company and ensure to keep records of their communication or interaction in the social media space and monitor the activities of third parties with whom they engage.

C. CLEARANCE AUTHORITY AND BUSINESS RESPONSIBILITY UNITS

1. Due regard to affiliations and/or memberships should be accorded as these may be sources of actual or perceived conflict of interest. Prior to embarking on any affiliation or membership, every Director, Officer and Employee should clear these with the appropriate clearance authority:

| REPORTING PERSON | CLEARANCE AUTHORITY |
|----------------------------|---|
| Director | Chairman of the Board of Directors |
| Officer | Office of the President and CEO |
| Organizational Head | Immediate Supervisor/ Immediate Organizational Head |
| Employee | Immediate Organizational Head |

2. The following matters or incident reports should be relayed to the appropriate Organization in the Company, as indicated:

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| INCIDENT REPORT | Organization |
|---|--|
| 1) Customer account/service complaints or operating troubles | Human Resources and Corporate Services |
| 2) Conduct unbecoming a Company... | |
| Director | Office of the Corporate Secretary |
| Officer | Office of the President and CEO |
| Organizational Head | Immediate Supervisor |
| Employee | Immediate Supervisor |
| 3) New products/ service offerings | Corporate Services |

V. EFFECTIVITY

This Social Media Policy shall take effect upon approval and shall be published in the website of the Company.