

## ELECTRONIC COMMUNICATIONS POLICY

This policy is fundamental to ensuring all risks associated with all electronic communications and electronic devices used are mitigated.

The Company regulates use of:

- Internet/intranet sites (includes but is not limited to web browsing, lists, forums, posts and internal office communications)
- Email
- Electronic journals and reporting
- Use of Company and Client communication systems and devices
- Electronic data of any form

This policy is also in place to ensure that use of Company and Client Electronic Communication systems and devices complies with other relevant laws, policies and practices regulating:

- Privacy
- Copyright breaches and patent materials
- Anti-discrimination
- Practices relating to the distribution of illicit and offensive materials, including those that are sexual or pornographic in nature

To ensure compliance with this policy all Company devices and electronic communications are subject to monitoring and / or auditing.

All electronic mail, documents, software, and data stored on Company equipment is Company property and subject to inspection at the Company's discretion.

### **Inappropriate / Unlawful Use**

Electronic hardware and software is intended for Company use. Any unauthorised, unlawful or unreasonable personal use of electronic equipment is prohibited. All pieces of hardware including workstations, notebooks, tablets and mobile devices are prepared with a Standard Operating Environment. Deviations or modifications from this environment will need approval from Pickwick 1A's ICT department. This includes core operating systems and applications currently deployed across the Company. Whilst employees may use personal email from Company owned devices no personal or private software is to be loaded on Company owned devices.

### **Use of Company Electronic Communications Facilities**

Messages for personal gain or solicitation, chain letters, and threatening, disparaging, obscene, or harassing messages are prohibited.

The use of the internet (including social media) and any other communication system (including mobile phones and text messaging) provided by Pickwick 1A is expressly prohibited for:

- dissemination or printing of copyrighted materials (including articles and software) in violation of copyright laws. It is especially important for employees to understand that the unauthorised use, duplication or distribution of computer software is a criminal offence
- unauthorised sending, receiving, printing or otherwise disseminating proprietary data including trade secrets or other confidential information
- sending, intentionally retrieving or soliciting sexually oriented messages or images
- operating a business, usurping business opportunities, soliciting money for personal gain, sending chain letters or conducting any outside business

- gambling or engaging in any activity in violation of local government, state or territory, or federal law
- any personal use that is excessive, has a negative impact on the Company or interferes with job performance
- downloading of media for private use where it interferes with the performance of Company equipment such as internet bandwidth, or operation of other persons
- sending or forwarding fraudulent, unlawful or abusive calls or messages

Use of personally owned electronic communication devices within the workplace may only be used where it does not interfere with the employees work duties or performance.

### **Handling Company Information**

Employees must safeguard confidential or proprietary information against unauthorised external and internal disclosure. Employees are responsible to ensure that each use of Company systems is authorised and proper. Employees must always use appropriate levels of password protection to prevent unauthorised access. Employees must never store sensitive Company information on any personal electronic device.

### **Social Media**

Directly representing Pickwick 1A in any form of social media needs to be approved by the Board of Directors. Inappropriate use of all forms of social media by employees is prohibited. Employees must never post anything that is false, misleading, obscene, defamatory, libelous, threatening, harassing, abusive, hateful or embarrassing to any other person or entity even outside of work hours, which relates to Pickwick 1A, its business or its employees. It is important you respect others' privacy and are aware that false or defamatory comments or the publication of an individual's private details could result in legal liability for Pickwick 1A and you.

Third party web sites and blogs that you link to must meet our standards of propriety. You must also never use your blog or other social media to disclose Pickwick 1A's confidential information or attempt to speak on behalf of Pickwick 1A including displaying any Pickwick 1A name or logo.

### **Internet Access**

Internet access through Company property and equipment is not considered a private activity. The Company reserves the right to monitor the volumes of internet activity by IP address and cost centre, and recover costs for the volumes of data retrieved from the internet. The Company can identify the sites visited by IP address.

Users must take precautions not to propagate viruses contracted from the internet. Any software downloaded from the Internet should be able to be used legally at the Company.

### **Violation of this Policy**

Any unauthorised, unlawful or unreasonable personal use of electronic communications or devices as stated within this policy will result in disciplinary action, which may include termination of employment and / or appropriate legal action.

### **Notification and Escalation of Concerns**

It is important that any workplace or work-related concerns you have are raised so they can be addressed. In the first instance you should speak of write to your direct manager or manager's manager.

For matters of a serious or confidential nature you should email Pickwick 1A at [confidential@pickwick1A.com.au](mailto:confidential@pickwick1A.com.au) and provide a means by which we can contact you. This email is monitored by a senior Pickwick 1A executive who will contact you in absolute



confidence. If emailing to this address it is important you stick to facts and events you have personal knowledge or information about including dates and times where known.

Pickwick 1A will deal with all disclosures to this email in accordance with legislative requirements including referring any allegation to the relevant authorities for further investigation. While genuine mistakes or errors can occur, it is important to refrain from making frivolous, false, misleading or unwarranted accusation towards another person as these can have severe implications for all parties involved, including the originator of any such allegation.

*Leanne Phillips*

Leanne Phillips  
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Pickwick 1A Facilities Services Pty Ltd  
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