

SOCIAL MEDIA POLICY

THIS DOCUMENT PROVIDES FOR THE GUIDELINES ON THE PROPER USE OF SOCIAL MEDIA WHEN PUBLISHING CONTENTS ABOUT CAVAGNA GROUP.

Cavagna Group – Corporate Governability

DRAFTED: MARKETING & COMMUNICATION DEPT. DOCUMENT CODE: MRK-SMP-01 VERSION: 00 STATE: APPROVED

SOCIAL MEDIA POLICY MRK-SMP-01 Vers. 00

STATE APPROVED



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In addition to publishing institutional content on the official website **www.cavagnagroup.com**, *Cavagna Group*® has also some social networks (precisely: *Twitter*, *Facebook, Linkedin, YouTube*), in order to promote its products and to inform in real time of projects and services, according to institutional and general interest purposes.

The Social Media Policy is the formally adopted code of conduct that provides the behavioural rules that employees and collaborators of Cavagna Group® (e.g. distributors, consultants, etc.), hereinafter "Promoters", are required to follow whenever they publish, share or comment on content regarding the *Cavagna Group*® company, regardless if the interaction on social media is carried out through an official *Cavagna Group*® account or through a personal account of the Promoter.

Improper use of social channels, in fact, may:

- even seriously damage the image and reputation of *Cavagna Group*® and, consequently, of the professionals who work there;
- also expose the company to direct damage (i.e. claims for compensation), if the content published infringes copyright and intellectual property rights.

The image of *Cavagna Group*® on social media is the responsibility of all the Promoters who, therefore, are called upon to follow the Group's communication strategy, which is suitable to guarantee:

- **consistency**: the presence on social media must be in line in content and style with the Group's other communication channels;
- **updating**: The Group undertakes to spread out constantly updated information through all its communication channels, which must therefore always be synchronised.

1. How to manage Official Cavagna Group® Social Media Accounts

The Marketing Service has the task of administering all official *Cavagna Group*® social accounts, which can be consulted at the section "<u>Official Social Media Accounts</u>" on the Cavagna Group® website.

The Marketing Service has the task of monitoring the reputation of *Cavagna Group*® and its representatives on social networks, evaluating posts and conversations in which *Cavagna Group*® is mentioned through tags (@cavagnagroup) and hashtags (#cavagnagroup).

2. How to make and publish a content on Official *Cavagna Group*® Social Media Accounts

The content published on institutional accounts must be processed by and/or agreed with the Marketing Service, which has to verify that the published content is always in line with the Group's communication strategy.



Textual, photographic and video content promoted on *Cavagna Group*® social channels, at the time of publication, must always meet the following requirements:

- it must be positive and in no way aimed at comparative advertising;
- it must comply with company policies and be in line with the values expressed in the Code of Ethics;
- it must refer to themes, events, products of interest to Stakeholders;
- it must provide reliable, verified information that always respects the copyright of others;
- if one or more products are promoted via social media, these must have already been put in a catalogue. Just medical devices always require a more detailed approval process, exclusively managed by the Marketing Service.
- the contents related to fairs/events/conferences must be texts/images/videos that provide current news at the time of publication, thus testifying to the happening in real time or to the short-term realization of the event mentioned;
- may provide information and/or particular curiosities related to *Cavagna Group*® and its technological heritage, but only with the approval of the Marketing Service;
- the photographic contents must have some basic technical characteristics, in particular: panoramic view; good lighting and bright colours; avoid backlighting and excessively dark shots. If you do not have suitable material, please consult the photographic archive by making a request to the Marketing Service.

Whoever is in charge of creating content on behalf of the company must be aware that, at the time of publication, they are speaking on behalf of the company and to a particular audience. Therefore, they must always make sure that the content shared:

- **are unassailable**: the web does not forget and any content can be "brought to light" and used against the author or against *Cavagna Group*® at any time;
- **do not spread**: personal data; company material protected by intellectual property rights (including copyright); confidential information.

All content posted on official social media are approved by the Marketing Service and can be freely shared by the Promoters.

3. How to make and publish a content on personal accounts

It is worth remembering that even content shared on personal accounts, once put online, can have global resonance.

Promoters, and especially employees, in the set-up, use and management of their private social media accounts are required to comply with certain rules of conduct, aimed at ensuring the protection and reputation of *Cavagna Group*® and the people who work there.

The employee/Promoter who chooses to make their work known, is required to specify, in the information posted about *Cavagna Group*®, that the opinions expressed are personal and not *Cavagna Group*® 's responsibility at all.



Promoters can freely share on their private profiles the contents published by *Cavagna Group*® social channels.

Regardless of the social network used, if the Promoters are going to publish new content related to *Cavagna Group*®, they must interface with the Marketing Service in the person of Miriam Cavagna (miriamcavagna@cavagnagroup.com) before publishing. If the social platform is either Linkedin, Twitter and/or Facebook, Promoters are strongly recommended to tag the official *Cavagna Group*® page (@cavagnagroup), in order to avoid the spreading of sensitive information without the approval of the Marketing Service.

Finally, the Promoters should avoid the dissemination on their private profile of content or information regarding *Cavagna Group*®, if they have not already been reported on official social channels and/or not communicated on the *Cavagna Group*® 's website or on another institutional site of the Group. In particular, the Promoters are not allowed to publish on their private profiles any kind of information or news circulating among the *Cavagna Group*® Companies as an internal communication.

Specifically, the staff of *Cavagna Group*®:

- is required to observe a public behaviour respectful of the company he/she works for;
- may not divulge through social media confidential information such as: internal correspondence; information of third parties of which he/she is aware (e.g. partners, institutions, users, stakeholders, etc.) or information on work activities, services, projects and documents not yet made public; decisions to be taken and measures relating to ongoing proceedings, before they have been officially deliberated and formally communicated to interested parties;
- must respect the privacy of colleagues, avoiding references to the work carried out, except for already public information;
- with the exception of public events that take place in the workplace, may not disclose photos, videos, or other multimedia material, filming personnel and premises of the company without the express permission of the Marketing Department;
- may not open blogs, pages or other channels in the name of *Cavagna Group*® or that deal with topics related to its activity, without the previous authorization of the Marketing Service;
- may not use trademarks owned by *Cavagna Group*® on personal accounts, without prior authorization of the Marketing Service and in the terms established by the Marketing Service.

Furthermore, without prejudicing the correct exercise of trade union freedoms and the right of criticism, it is advisable to refrain from transmitting and disseminating messages that, due to their form and content, could in any case harm *Cavagna Group*®, damaging its image or compromising its efficiency.



4. How to have a responsible conversation on social networks, in accordance with company policies (for *Cavagna Group*® 's employees only)

The corporate social channels are managed by the Marketing Service, according to a dedicated editorial planning. It is recommended to share the contents published on official *Cavagna Group*® accounts, according with the modalities of the social used (retweet, like, share, etc.).

Ideas and proposals for new content to be shared on social media are welcome, but please remember that, before publishing on personal and/or corporate accounts, it is necessary to always discuss with the Marketing Service, in the person of Miriam Cavagna (miriamcavagna@cavagnagroup.com).

The language must adapt to the style of the social media used:

- *Twitter* has a purely telegraphic language and the goal is to launch a news: the word comes before the image, sometimes absent;
- *Linkedln* is more elaborate and institutional, it prefers a professional tone, a higher register and more in-depth content;
- *Facebook* prefers informative posts in which image and description complement each other.

The rules for the web editing of any other text are still valid:

- write in a grammatically correct way;
- write only certain and verified facts;
- do not be disrespectful to people, companies, groups or categories/ethnic groups of people and institutions;
- do not tag or hashtag third parties (especially large OEM brands), unless authorized by the Marketing Department;
- do not use hashtags and/or tags of *Cavagna Group*® (#Cavagnagroup or @CavagnaGroup) on third party pages, unless previously authorized by the Marketing Service;
- always respect the rules of good manners (netiquette) and the principles expressed in the *Cavagna Group*® <u>Code of Ethics</u>.

N.B. The Marketing Service, not the individual employee/Promoter, is in charge to moderate inappropriate or defamatory content posted by private users.

Employees who are qualified to use corporate social accounts and who also have personal accounts, are called upon to pay the utmost attention when using the 2 different profiles, adopting all the necessary precautions, including technical ones, to avoid the exchange of profiles during the use of the tools.

The breach of the above-mentioned rules of behaviour shall be subject to disciplinary measures through disciplinary proceedings, based on the principles of proportionality and gradualism of sanctions.