



# SOCIAL MEDIA POLICY

CREDIT GLORIOUS  
PROPERTY HOLDINGS LTD.  
CRISIS MANAGEMENT DEPARTMENT

# SOCIAL MEDIA POLICY

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## PREAMBLE

In the rapidly evolving digital landscape, social media platforms have emerged as pivotal channels for communication, branding, and customer engagement. Credit Glorious Property Holdings Ltd. acknowledges the significant impact of social media on public perception and business operations. Recognizing the dual nature of social media as both an opportunity and a risk, this policy is designed to provide comprehensive guidelines for the responsible and effective use of social media by Credit Glorious employees and representatives. It aims to harness the power of these platforms to enhance our brand, engage with diverse audiences, and drive business growth, while mitigating potential risks associated with online interactions.

## ARTICLE 1 – POLICY OVERVIEW

### Purpose and Intent

This Social Media Policy establishes the standards and procedures for the use of social media by employees and representatives of Credit Glorious Property Holdings Ltd. The policy serves multiple purposes:

- To protect and enhance the company's reputation and brand image.
- To ensure compliance with legal and regulatory standards governing online communications.
- To align social media activities with the company's overarching values, ethics, and business objectives.
- To provide clear guidelines for responsible and professional conduct on social media platforms.

### Scope and Applicability

The policy applies universally to all employees, contractors, and representatives of Credit Glorious Property Holdings Ltd., encompassing its global operations, including subsidiaries in Hong Kong, Sofia, Bulgaria, and Paris, France. It covers all forms of social media interactions, including but not limited to social networking sites, blogs, forums, and any other forms of online publishing or discussion.

### Responsibility and Accountability

All employees and representatives of Credit Glorious are expected to adhere to this policy. Each individual is responsible for their actions on social media and must be aware that their online behavior can have a direct impact on the company's image and reputation. The policy emphasizes the need for thoughtful and respectful online engagement, reflecting the company's commitment to maintaining a positive and professional presence in the digital realm.

### Integration with Other Policies

This Social Media Policy is integrated with other relevant company policies, including but not limited to the Code of Conduct, Privacy Policy, Confidentiality Agreements,

and IT Security Policies. Employees and representatives are expected to understand and comply with all related policies when engaging in social media activities.

## Continuous Review and Adaptation

Recognizing the dynamic nature of social media and its evolving role in business and society, this policy is subject to regular review and updates. Credit Glorious is committed to staying abreast of the latest trends, technologies, and best practices in social media, ensuring that our policy remains relevant, effective, and aligned with our strategic goals.

## ARTICLE 2 – GLOBAL APPLICATION

### Universal Relevance

- The Social Media Policy of Credit Glorious Property Holdings Ltd. is universally relevant and enforceable across all geographical locations where the company operates. This ensures that employees, regardless of their location, adhere to a consistent set of guidelines.
- The policy's global application underscores the company's commitment to maintaining a cohesive and responsible social media presence worldwide. Cross-Departmental Application
- The policy applies to all departments within the organization, from executive levels to operational staff. This inclusive approach ensures that everyone representing Credit Glorious understands their role and responsibilities in upholding the company's image on social media.

### Compliance Across Subsidiaries

- Employees and representatives of Credit Glorious's subsidiaries in Hong Kong, Sofia, Bulgaria, and Paris, France, are also bound by this policy. It is crucial that these subsidiaries align their social media practices with the overarching principles and standards set by the parent company.

### Inclusive of All Social Media Platforms Comprehensive Coverage

- The policy encompasses a wide range of social media platforms, acknowledging the diverse ways in which digital communication occurs in the modern world. This includes established platforms like Facebook, Twitter, LinkedIn, and Instagram, as well as emerging social media channels and digital forums.

### Adaptability to New Platforms

- As new social media platforms and communication channels emerge, the policy will be reviewed and updated accordingly. This ensures that the guidelines remain relevant

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and effective in the ever-evolving digital landscape.

## Professional Networking Sites

- Special attention is given to professional networking platforms such as LinkedIn, where the line between personal and professional representation can often blur. Employees are encouraged to exercise discretion and professionalism on these platforms, reflecting the company's values and standards.

## Extent of Coverage

### Direct and Indirect References

- The policy's scope includes both direct mentions of Credit Glorious Property Holdings Ltd. and indirect references that could be associated with the company. This includes discussions about the company's services, operational strategies, or any other business-related topics.

## Personal Accounts

- While employees are free to express personal views on their private social media accounts, they must be cautious not to inadvertently represent the company's official stance or disclose sensitive information.

## Content Creation and Sharing

- The policy also covers the creation and sharing of content related to Credit Glorious. Employees must ensure that any content they create or share, even on personal accounts, aligns with the company's values and does not compromise its reputation or confidentiality.

## ARTICLE 3 - PERSONAL AND PROFESSIONAL USE

### Personal Use

#### Guidelines for Personal Conduct

- Employees are encouraged to use social media responsibly in their personal capacity. They should be mindful that their online behavior can reflect on Credit Glorious's reputation.
- Personal social media accounts should not be used for disseminating, discussing, or disclosing any information related to Credit Glorious's internal affairs, confidential data, or intellectual property.
- Employees must avoid making defamatory, derogatory, or offensive comments that could be linked to Credit Glorious, either directly or indirectly.

#### Distinction from Company Views

- Personal posts must clearly distinguish personal opinions from company views. Employees should include a disclaimer when

their content might be perceived as representative of the company's stance.

## Professional Use

### Conduct on Official Accounts

- Official social media accounts representing Credit Glorious must adhere to a high standard of professionalism. This includes maintaining accuracy, respectfulness, and compliance with the company's ethical standards in all posts.
- Content shared through official channels should align with Credit Glorious's branding, marketing, and communication strategies. It should contribute positively to the company's image and public perception.

## Content Approval and Oversight

- Posts on official accounts may require prior approval from designated supervisors or the communications department, especially when dealing with sensitive topics or major announcements.
- A designated team or individual should regularly monitor and manage official accounts to ensure consistency, accuracy, and timely responses to public interactions.

## Crisis Communication

- In the event of a crisis or negative publicity, employees should refrain from commenting on the situation via personal or professional accounts. All communication should be channeled through authorized spokespersons or the communications department.

## ARTICLE 4 – CONFIDENTIALITY AND PRIVACY

### Protection of Sensitive Information

- **Vigilance in Communication:** Employees must be vigilant in ensuring that their social media interactions do not inadvertently reveal sensitive information about Credit Glorious or its clients.
- **Prohibited Disclosures:** Explicitly prohibited disclosures include, but are not limited to, unpublished financial reports, unannounced business strategies, client and employee personal data, and any proprietary or internal information.
- **Training and Awareness:** Regular training sessions will be conducted to educate employees about the types of information considered sensitive and the consequences of unauthorized disclosure.

## Adherence to Privacy Laws

- **Compliance with GDPR and Other Regulations:** In line with the UK's adherence to the General Data Protection Regulation (GDPR) and other relevant privacy laws, employees

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must handle personal data with the utmost care and legality.

- **International Considerations:** For operations in regions like Hong Kong, Sofia, and Paris, compliance with local data protection laws such as the Personal Data (Privacy) Ordinance (PDPO) in Hong Kong will be strictly enforced.
- **Consent for Sharing:** Employees must obtain explicit consent before sharing any personal information of colleagues, clients, or business partners on social media platforms.
- Employees should exercise discretion when discussing or referencing topics that could be deemed sensitive, such as internal company matters, client-specific information, or industry-specific issues.
- **Guidance on Ambiguities:** In cases where the sensitivity of a topic is ambiguous, employees are encouraged to seek guidance from their supervisors or the legal department before making any public statements.
- **Training on Sensitive Communications:** Specialized training will be provided to employees on how to navigate discussions around sensitive topics while adhering to confidentiality and privacy standards.

## ARTICLE 5 – COMPLIANCE WITH LAWS AND REGULATIONS

### Legal Compliance

- **Adherence to UK Legislation:** In accordance with UK legislation, all social media content created or shared by employees must comply with laws related to defamation, intellectual property, and anti-discrimination.

### International Legal Handling Sensitive Topics

- **Discretion in Discussions Frameworks:** Employees must also be aware of and comply with the legal frameworks of other countries where Credit Glorious operates, ensuring global legal compliance in social media activities.

### Marketing and Advertising Regulations

- **Respecting Advertising Standards:** Content related to marketing or advertising must adhere to the UK Advertising Standards Authority (ASA) guidelines and similar regulations in other jurisdictions.
- **Compliance with Advertising Standards:** In line with the UK's Advertising Standards Authority (ASA) guidelines, all marketing content must be honest, transparent, and not misleading.
- **Clear Endorsements:** When endorsing products or services, employees must clearly disclose their relationship with Credit Glorious,

adhering to the UK's Consumer Protection from Unfair Trading Regulations.

- **Influencer Marketing Guidelines:** For influencer marketing, it's crucial to follow the CAP Code (UK Code of Non-broadcast Advertising and Direct & Promotional Marketing) to ensure that promotional content is identifiable and transparent.
- **Transparency in Promotions:** Employees must clearly disclose any company affiliations in their social media posts if they are endorsing Credit Glorious's products or services, in line with the UK's Consumer Protection from Unfair Trading Regulations.

### Intellectual Property Rights

- **Respecting Copyright Laws:** Employees must respect intellectual property rights by not sharing copyrighted material without proper authorization or attribution.
- **Use of Company Assets:** When using company logos, images, or other branded materials on social media, employees must follow the company's guidelines to ensure proper and legal use.
- **Adherence to Legal Standards:** All social media content, whether personal or professional, must align with UK laws on anti-discrimination, libel, privacy, and intellectual property rights.
- **Avoidance of Prohibited Content:** Employees must avoid posts that could be perceived as hate speech, harassment, or discriminatory. This includes being vigilant against content that could be construed as defamatory under UK defamation laws.
- **Responsibility in Expression:** While expressing opinions, employees should maintain a respectful tone and avoid statements that could harm the reputation of individuals or entities, in line with the UK's legal framework on public communication.

### Regulatory Compliance in Different Jurisdictions

- **Global Legal Awareness:** Employees must be cognizant of the legal and regulatory differences in regions where Credit Glorious operates, such as GDPR compliance in Europe, and relevant laws in Hong Kong, Sofia, and Paris.
- **Cultural Sensitivity:** Content should be tailored to respect the cultural norms and legal requirements of each region, avoiding generalizations or assumptions about local practices.
- **Ongoing Legal Education:** Regular training sessions and updates will be provided to employees to keep them informed about the

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latest developments in social media laws and regulations globally, with a focus on ensuring compliance across all jurisdictions.

## ARTICLE 6 – RESPECT AND PROFESSIONALISM Maintaining Professional Conduct

- **Tone and Language:** All social media interactions should be conducted with a tone of respect and professionalism. Avoid using slang, jargon, or language that could be interpreted as offensive or disrespectful.
- **Non-Discriminatory Content:** Ensure that all posts are free from discriminatory remarks, hate speech, or content that could be perceived as biased against any group or individual, in line with the Equality Act 2010 in the UK.
- **Positive Representation:** Each post should reflect positively on Credit Glorious's values and reputation, showcasing the company as a responsible and ethical entity.

## Engagement Guidelines

- **Constructive Interaction:** Engage with users in a constructive manner, offering helpful and accurate information where appropriate.
- **Brand Ambassadorship:** Employees should act as ambassadors for Credit Glorious, promoting a positive image of the company and its services.
- **Conflict Avoidance:** Avoid engaging in online disputes or arguments. If a conversation becomes contentious, take a step back and, if necessary, refer the matter to a supervisor or the social media team.

## ARTICLE 7 – CRISIS MANAGEMENT Handling Negative Publicity

- **Immediate Reporting:** In the event of negative publicity or a social media crisis, employees should immediately report the issue to the designated crisis management team.
- **Refraining from Public Response:** Employees should not respond publicly to any crisis-related posts or comments. All communication should be managed by the crisis management team to ensure a coordinated and strategic response.
- **Crisis Communication Plan:** Credit Glorious has a crisis communication plan in place, which includes specific protocols for handling social media crises. This plan will be activated in such events to manage the situation effectively.

## Role of the Crisis Management Team

- **Assessment and Strategy:** The crisis management team will assess the situation and develop a response strategy that aligns with Credit Glorious's values and public image.

- **Coordinated Response:** The team will coordinate all external and internal communications, ensuring consistency and accuracy in the company's response.
- **Post-Crisis Review:** After resolving the crisis, the team will conduct a post-crisis review to analyze the response's effectiveness and identify areas for improvement.

## ARTICLE 8 – MONITORING AND ENFORCEMENT Monitoring Social Media Activity

- **Scope of Monitoring:** Credit Glorious's approach to monitoring social media activities is comprehensive, focusing on ensuring that all online representations and mentions of the company align with this policy. The monitoring encompasses content on official company accounts, as well as personal accounts of employees, where their posts are related to the company or its operations.
- **Methodology:** The company will employ a combination of manual oversight and automated tools for effective monitoring. Automated tools may include social media monitoring software that can track mentions, hashtags, and keywords associated with Credit Glorious. Manual monitoring will be conducted by designated staff members who are trained to identify potential policy breaches.

## Addressing Policy Violations

- **Procedure for Violations:** When a potential violation is identified, a structured response will be initiated. This typically begins with an initial assessment to understand the context and severity of the issue. Following this, the employee involved may receive a formal notification and be required to attend a meeting with their supervisor or a representative from the Human Resources department to discuss the incident.
- **Consequences:** The disciplinary actions for violations of the social media policy will be proportional to the severity and impact of the breach. Actions may include a formal warning, mandatory retraining, suspension, or in severe cases, termination of employment. The company's response aims to be fair and consistent, taking into account the nature of the violation and any previous incidents.
- **Communication:** Credit Glorious is committed to maintaining transparency with its employees regarding social media monitoring. Employees will be regularly informed about the monitoring practices, including the tools and methods used, through internal communications, training sessions, and policy documents.
- **Privacy Considerations:** In conducting social media monitoring, the company will balance



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the need for policy compliance with respect for employee privacy. Monitoring will be conducted in accordance with applicable laws and regulations, such as GDPR in Europe, ensuring that employees' privacy rights are not infringed. The company will avoid monitoring personal social media accounts unless there is a reasonable and justifiable business need to do so.

## ARTICLE 9 – TRAINING AND AWARENESS Regular Training Sessions

- **Content:** The training sessions will comprehensively cover the responsible use of social media, emphasizing understanding the policy's nuances and the consequences of non-compliance. This includes guidance on what constitutes appropriate content, how to handle sensitive information, and the legal implications of social media activities.
- **Interactive Approach:** To enhance engagement and retention, the training will adopt an interactive format. This will involve role-playing exercises, discussions on hypothetical scenarios, and analysis of real-world case studies that demonstrate both positive and negative uses of social media in a corporate context.

## Induction Program for New Employees

- **Integration into Onboarding:** The Social Media Policy will be a key component of the induction program for new hires. This ensures that from their first day, employees are aware of the company's expectations regarding social media use and understand the importance of adhering to these guidelines.
- **Customized Sessions:** Recognizing that different roles may have varying levels of exposure and risk associated with social media use, the training for new employees will be tailored accordingly. For instance, marketing and communications personnel may receive more in-depth training on brand representation and public engagement.

## Continuous Awareness

- **Updates and Refreshers:** To keep pace with the rapidly evolving social media landscape, employees will receive regular updates and refresher courses. These sessions will address new social media platforms, emerging risks, and changes in legal regulations related to social media use.
- **Resources and Support:** A range of resources, such as guidelines, best practice manuals, and FAQs, will be made available to employees. Additionally, a dedicated point of contact within the HR or Communications department will be

established for employees to seek clarification or advice on policy-related matters.

## Feedback Mechanism

- **Encouraging Feedback:** An open-door policy for feedback on the training and the Social Media Policy itself will be encouraged. Employees will have multiple channels, such as surveys, suggestion boxes, and open forums, to voice their opinions and suggestions.
- **Adaptation to Feedback:** The company commits to actively listening to employee feedback and incorporating it into the ongoing development of the policy and training programs. This adaptive approach ensures that the policy remains relevant, effective, and reflective of both the company's and employees' needs in the dynamic social media environment.

## ARTICLE 10 – POLICY REVIEW AND UPDATE Annual Review Process

- **Scheduled Reviews:** The Social Media Policy will undergo a formal review every year. This process will be scheduled and led by a dedicated team comprising members from the legal, HR, and communications departments.
- **Comprehensive Evaluation:** The review will assess the policy's effectiveness, relevance, and alignment with current social media trends, technological advancements, and legal developments. It will also evaluate the policy's impact on employee engagement and the company's online presence.

## Incorporating Changes in Legal Requirements

- **Legal Monitoring:** A key aspect of the review will be monitoring changes in legislation and regulatory guidelines related to social media use, both in the UK and in other jurisdictions where Credit Glorious operates. This ensures that the policy remains compliant with all relevant laws and regulations.
- **Legal Expertise:** The company will consult with legal experts specializing in social media, data protection, and employment law to ensure that any legal changes are accurately reflected and implemented in the policy.

## Adapting to Social Media Trends

- **Trend Analysis:** The review team will analyze emerging trends in social media, including new platforms, user behaviors, and communication practices. This analysis will help in adapting the policy to remain effective and relevant in a rapidly evolving digital landscape.
- **Industry Benchmarking:** Comparing the company's policy with industry best practices and standards will be an integral part of the review process. This benchmarking will help in

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identifying areas for improvement and innovation.

## Updating Company Objectives

- **Alignment with Business Goals:** The policy will be reviewed in the context of the company's broader objectives and strategies. This ensures that the social media guidelines support and enhance the company's goals, such as brand building, customer engagement, and market expansion.
- **Stakeholder Input:** Feedback from various stakeholders, including employees, management, and clients, will be considered during the review process. This inclusive approach ensures that the policy addresses the needs and concerns of all parties involved.

## Communication of Updates

- **Dissemination of Changes:** Any updates or changes to the policy will be communicated clearly and promptly to all employees. This communication will be done through multiple channels, such as email, internal newsletters, and staff meetings.
- **Training on Updated Policy:** Following significant updates, additional training sessions will be organized to ensure all employees understand the new guidelines and their implications.

## CONCLUSION

Credit Glorious Property Holdings Ltd. recognizes the significant impact and opportunities that social media presents in today's digital landscape. As such, the company encourages its employees to actively engage with and utilize social media platforms, both professionally and personally. However, this engagement must be balanced with a sense of responsibility and an understanding of the potential risks involved.

The Social Media Policy outlined herein serves as a comprehensive guide for all employees, ensuring that their online activities align with the company's core values, ethical standards, and legal obligations. By adhering to these guidelines, employees can contribute positively to the company's online presence and reputation, while also safeguarding their professional integrity and the company's interests.

## Key Points of Emphasis:

1. **Brand Representation:** Employees are ambassadors of the Credit Glorious brand on social media. Their online conduct should reflect the professionalism, respect, and integrity that the company stands for.
2. **Legal Compliance:** It is crucial that all social media activities comply with relevant laws and regulations. This not only protects the company but also the individual employee from legal repercussions.
3. **Confidentiality and Discretion:** Employees must be vigilant in protecting sensitive and confidential information. Disclosures of such information can have serious consequences for the company and its stakeholders.
4. **Crisis Management:** In the event of a social media crisis, employees are expected to adhere to the company's crisis management protocols, ensuring a coordinated and effective response.
5. **Continuous Learning and Adaptation:** The digital world is ever-evolving, and so are the norms and practices of social media. Employees are encouraged to stay informed and adapt to these changes, leveraging opportunities for professional and personal growth.

In conclusion, the responsible use of social media is not just a policy mandate but a reflection of our collective commitment to maintaining the highest standards of professionalism and ethics. Credit Glorious Property Holdings Ltd. believes that with thoughtful and responsible use, social media can be a powerful tool in advancing our business goals, enhancing our brand image, and fostering positive relationships with our clients, partners, and the broader community.