



Social Media Employee Code of Conduct

This document provides requirements for how employees participate in social media. This document is designed to:

- Advise the Anatara Lifesciences social media policy
- Guide employee participation in social media

Social media is now integral to our professional and personal lives, but it does not change the basic rules of honesty, courtesy and respect that Anatara Lifesciences and its employees promote.

Information is disseminated very quickly via social media and is (virtually) impossible to retract once published; even when deleted, information has been cached by computers around the world. Google never forgets.

It is therefore necessary to establish clear protocols on the use of social media.

Purpose

For the purposes of this document, 'social media' includes:

- Social networking sites e.g. Facebook, LinkedIn, etc.
- Video and photo sharing websites e.g. Instagram, Flickr, YouTube, etc.
- Micro-blogging sites e.g. Twitter, Pinterest, etc.
- Blogs, including corporate blogs, personal blogs or blogs hosted by traditional media publications
- Forums and discussion boards such as Whirlpool, Yahoo! Groups or Google Groups
- Online encyclopedias such as Wikipedia
- Other web sites that allow individual users or companies to use simple publishing tools.

Scope

The Code of Conduct applies to all Anatara Lifesciences employees, internal contractors and to any other person who is notified that this policy applies to them in the course of their work on behalf of the Anatara Lifesciences. All information contained within this document is subject to any applicable country, state, and/or local laws.

Anatara Lifesciences-supported Social Media Tools

The Anatara Lifesciences has established the following social media channels:



@AnataraANR



The “Anatara Lifesciences” Social Media Policy

Employees of publicly listed companies must bear in mind issues around disclosure and confidentiality.

Some practical examples of circumstances where disclosure / confidentiality laws could be applied include:

1. Posting financial information or reports on the Anatara Lifesciences;
2. Revealing information about a competitor; and
3. Revealing information that is not in the public domain.

As a result, no employee is permitted to post information on the Anatara Lifesciences on social media without approval.

Employees are permitted and encouraged to retweet information posted on the official Anatara Lifesciences social media platforms.

Whilst this policy respects the rights of the Anatara Lifesciences’s employees to use social media personally; employees must be cognisant that this activity also reflects on them professionally and can impact on the Anatara Lifesciences.

We approach our employee relationships from a foundation of trust and as such do not monitor the personal use of social media by our employees. We do however expect that personal social media sites are not accessed on the Anatara Lifesciences’s computers and access on personal devices is limited.

General Guidelines for Social Media participation

The following principles have been developed to guide personal social media use:

- **Keep a clear delineation** between Anatara Lifesciences and personal social media channels if you manage or contribute to the Anatara Lifesciences social media channels.
- **Post meaningful, respectful comments**—in other words, no spam and no remarks that are off-topic or offensive.
- **Always pause and think before posting.** That said, reply to comments in a timely manner, when a response is appropriate.
- **Respect proprietary information** and content, confidentiality and confidential information of the Anatara Lifesciences, other workers, our clients and their workers.
- When disagreeing with others' opinions, keep it **appropriate and polite**.
- **Be transparent.** Your honesty—or dishonesty—will be quickly noticed in the social media environment. If you have a vested interest in something you are discussing, be the first to point it out.

- **Be judicious.** Make sure your efforts to be transparent don't violate privacy, confidentiality, and legal guidelines. Ask permission to publish or report on conversations that are meant to be private. What you publish is widely accessible and will be around for a long time, so consider the content carefully.
- **It's a conversation.** Talk to your readers like you would talk to real people in professional situations. In other words, avoid overly pedantic or "composed" language. Don't be afraid to bring in your own personality and say what's on your mind. Consider content that's open-ended and invites response. Encourage comments. You can also broaden the conversation by citing others who are blogging about the same topic and allowing your content to be shared or syndicated.
- **Are you adding value?** There are millions of words out there. The best way to get yours read is to write things that people will value.
- **Did you make a mistake?** If you make a mistake, admit it. Be upfront and be quick with your correction. If you're posting to a blog, you may choose to modify an earlier post—just make it clear that you have done so.
- **If it gives you pause, pause.** If you're about to publish something that makes you even the slightest bit uncomfortable, don't shrug it off and hit 'send.' Take a minute to review these guidelines and try to figure out what's bothering you, then fix it. Ultimately, what you publish is yours—as is the responsibility. So be sure.
- Respect **copyright and financial disclosure laws**, and don't provide the Anantara Lifesciences's confidential or other proprietary information.
- **If in doubt about whether to post something, don't!**

Consult your immediate supervisor/manager if you are unsure of how to comply with this policy.

Failure to comply with this Policy could lead to disciplinary action, including termination of employment or contract.