

POLICY TITLE:

SOCIAL MEDIA POLICY

Key Words: Social Media, Social Networks, Internet, Digital Media, Technology

<p><u>POLICY PURPOSE:</u></p>	<p>This Policy is designed to protect the interests of Ramsay Health Care Limited, its subsidiaries and all of their Staff (Ramsay). To this end, when engaging in social media, Ramsay expects Staff to consider that they are representatives of the organisation and to take responsibility for ensuring that any references to Ramsay, its activities, or its' Staff are accurate and comply with Ramsay's other policies referred to below.</p> <p>This Policy also prohibits the unauthorised creation of Ramsay social media accounts (including Ramsay hospitals/facilities or related businesses).</p>
<p><u>SCOPE OF APPLICATION:</u></p>	<p>This Policy covers all Staff which, for the purposes of this Policy, includes the Ramsay Board, employees, contractors, visiting medical officers, consultants, temporary staff, agency staff, volunteers, students and other workers at Ramsay who use social media for business purposes, or who use social media in a personal capacity and comment on Ramsay and/or its activities, or other Ramsay Staff.</p> <p>This Policy also covers responsible engagement in online conversations on Ramsay's behalf by Authorised Representatives and Content Managers. Understanding how to interact with others and exchange ideas within this channel is essential to Ramsay's growth as a leading health care company.</p> <p>This Policy applies whether or not a Staff member is using Ramsay equipment or their own equipment.</p> <p>This Policy applies across Ramsay Health Care's global operations including:</p> <ul style="list-style-type: none"> • Australia; • UK; • France; • Asia; and • Any other regions in which Ramsay Health Care operates
<p><u>POLICY REFERS TO:</u></p>	<p>All Ramsay Staff which for the purpose of this Policy, includes the Ramsay Board, all employees, Ramsay hospitals, Ramsay business units, contractors, visiting medical officers, consultants, temporary staff, agency staff, volunteers, students and other workers at Ramsay must adhere to this policy.</p>
<p><u>POLICY STATEMENT:</u></p>	<p>This Policy sets out rules surrounding appropriate adoption and use of social media and covers social networking tools such as (without limitation):</p> <ul style="list-style-type: none"> • social networking sites e.g. Facebook, Google Plus, LinkedIn, Yammer

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	<ul style="list-style-type: none"> • video, slide and photo sharing sites e.g. YouTube, Slideshare, Flickr, Instagram, Snapchat, Vine, Pinterest • micro blogging sites e.g. Twitter, Tumblr, Wordpress, Posterous • forums and discussion boards eg Google Groups, Bub Hub, Belly Belly, Essential Baby, Quora, weblogs including corporate blogs, personal blogs or blogs hosted by traditional media publications • mobile applications and texting <p>This Policy should be read and understood by all hospital and business unit managers, and employees in conjunction with other Ramsay policies including the <i>Ramsay Code of Conduct</i>, the <i>Workplace Discrimination & Harassment Policy</i>, the <i>Confidentiality Privacy & Intellectual Property Policy</i>, the <i>Workplace Diversity Guidelines</i> and the <i>IT Acceptable Use Policy</i>.</p> <p>Due to the speed at which social media changes, this Policy will be reviewed regularly and updated as appropriate. However, the principles and guidelines included in this Policy should be applied to new tools and platforms as they arise even where they have not yet been expressly referenced in this Policy.</p>
<p><u>EXPECTED OUTCOME:</u></p>	<p>All Staff are expected to comply with this Policy, resulting in the positive use of social media for business whilst minimising inappropriate use of and risks associated with social media.</p>
<p><u>BACKGROUND</u></p>	<p>Social media offers a unique opportunity for people to gather in online communities of shared interest and create, share or consume content.</p> <p>Ramsay recognises that social media is becoming an increasingly important tool for corporate and business engagement and along with other forms of communication, provides the opportunity to reach out and connect with employees, stakeholders and the public. Where appropriate, Ramsay therefore encourages and supports the professional use of social networks by Staff to build more meaningful networks and relationships with relevant stakeholders.</p> <p>Ramsay also recognises that with this rapid growth in the use of social media, it is important to provide a policy framework and guidelines which clearly outline Ramsay's expectations of how social media can be used and which also clearly outlines each Staff member's responsibilities in relation to the use of social media, either as part of their normal duties, or when commenting on Ramsay and/or Ramsay's activities or other Ramsay Staff in a personal capacity.</p> <p>This Policy is designed to protect the interests of Ramsay and its' Staff. To this end, when engaging in social media, Ramsay expects Staff to consider that they are representatives of the organisation and to take responsibility for ensuring that any references to Ramsay, its activities, or its Staff are accurate and comply with Ramsay's other policies referred to below.</p> <p>All confidential information relating to Ramsay's business and its Staff must be kept confidential at all times. Staff must protect and maintain the privacy of all other Staff, patients and members of the community and must not do anything or allow a third party to do anything that will have or is likely to have a negative impact on Ramsay's reputation.</p>

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<p>1.0 Using Social Media for business-related purposes</p>	<p>Before engaging in social media for work-related purposes, as an official representative of Ramsay you must be <i>authorised to comment</i>. A person can become <i>authorised to comment</i> by the completing the formal authorisation process as determined by Group Marketing and set out below:</p> <ol style="list-style-type: none"> 1. complete a social media training course or training material developed by Group Marketing; 2. obtain prior written approval from the Hospital CEO or Corporate Department Manager; and 3. obtain prior written approval from Group Marketing under advice from regional offices.
<p>2.0 Roles and Responsibilities</p>	<p>This section provides guidance on the roles and responsibilities of Ramsay Staff in the effective use of social media on behalf of the Company. Before a Ramsay Staff member can fulfil one of these roles they must be <i>authorised to comment</i> as covered in section 1.0 of this Policy.</p> <p>Authorised Representatives An Authorised Representative has been granted authorisation to comment on information that is already in the public domain and is within their specific area of expertise and authority. An Authorised Representatives role is to build goodwill and more meaningful community and business relationships. Once you are recognised as an Authorised Representative of Ramsay and when engaging in social media activities, you must:</p> <ul style="list-style-type: none"> • disclose that you are a Ramsay employee and be clear about who you are representing; • disclose and comment only on information that is already approved by the Company to be in the public domain; • ensure that all content published is accurate and not misleading; • comment only on areas that are within your expertise and authority • ensure that your comments are respectful, non-defamatory; non-discriminatory and could not be considered as a form of harassment or bullying; • not breach intellectual property (eg: copyright) or privacy laws; • not bring Ramsay or any Ramsay facility into disrepute; • comply with Social Media Guidelines; • not defame any Ramsay Staff or any members of the community; and • adhere to all other Ramsay policies (including the policies referred to on page 6). <p>Content Managers Content Managers, usually appointed at a Hospital or Ramsay subsidiary level, monitor online behaviour and respond according to Ramsay’s Social Media Guidelines. The Content Manager’s focus should be on building relationships with their immediate community and business partners, while delivering relevant content in the correct tone and manner. The outcome should be successful promotion of the brand and service.</p> <p>Group Marketing The role of Group Marketing is to ensure Ramsay’s Social Media Policy is being adhered to at all times, oversee the engagement of the brand in all social channels, and the social strategy for the Company.</p>

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<p>3.0 Guidelines for Ramsay Staff</p>	<p>The following represent what Ramsay considers is <i>best practice</i> when using social media and it is expected that Ramsay Authorised Representatives and Content Managers comply with these guidelines when using social media.</p> <ul style="list-style-type: none"> • Think first: Before you post a comment on any social media channel or website, ask yourself; “Is this comment appropriate? Would I like this said about my company, my work, or myself? Am I presenting myself as well as I could? Can I harm someone’s reputation?” There have been lawsuits brought against individuals for defamatory comments posted online. • Be Transparent: Make it clear who you are and what your role is in the business. Transparency is key if the person or patient wants to follow up an issue or complement your exchange. • Be Civil: Social media is simply another communication channel used by Ramsay, so at all times the same high professional standards of conduct apply. Never use personal attacks, engage in confrontational exchanges or make defamatory remarks – these are not acceptable in any Ramsay communication. Be mindful of how your posts and social media activity might reflect on the reputation of Ramsay and its’ Staff. • Addressing Negative Comments: On occasion, people and patients will provide negative feedback. In most instances, a response should not be posted unless you have referred to the Ramsay Social Media Policy and checked with Group Marketing. This will ensure Authorised Representatives are aware of the different types of negative feedback and how to best respond. • Removing Offensive Comments: Sometimes people and patients will post abusive, hateful or offensive comments in open forums, such as blogs, review sites, Facebook or YouTube. Sometimes, removing or hiding these posts can create more trouble than the original offensive post. Unless you have prior consent to handle these circumstances, Authorised Representatives should check with Group Marketing of the appropriate course of action. When profanity is used, these comments should be removed. If you do not have the authority to remove a comment make sure you promptly forward the issue onto Group Marketing.
<p>4.0 Key legal risks for Ramsay Staff</p>	<p>When operating in online and social media, Ramsay Staff must ensure they are aware of the legal risks, some of which are unique to the social nature of the channel. The key risks which must be considered and managed appropriately include:</p> <ul style="list-style-type: none"> • Defamation: Ramsay must not display material that damages or is likely to damage the reputation or character of another person. Any social media which you believe in any way defames someone or is likely to defame someone must be promptly removed. • Copyright Infringement: Ramsay must not display any material which appears not to belong to the person who uploaded it, and which appears to be the intellectual property of another person or company. For example, any uploaded corporate logos or excerpts from articles or books need to be vetted and will need to be immediately removed if they breach the copyright owner’s rights. If unsure seek prompt instruction from Group Marketing. • Misleading Statements: Ramsay must not display any misleading statements or statements that are likely to mislead or deceive. If

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	<p>you believe an uploaded statement is untrue or is likely to mislead or deceive someone, and that statement is more than simply an innocent opinion (for example: “this outcome is rigged”), such a statement should be removed.</p> <ul style="list-style-type: none"> • Offensive Content or Language: Ramsay must ensure that any offensive content is promptly addressed. The Content Manager must remove content that: <ul style="list-style-type: none"> ○ infringes any law ○ is obscene or profane ○ is derogatory ○ is defamatory ○ is pornographic or sexually inappropriate ○ is violent, abusive, threatening or harassing ○ is objectionable in relation to race, relation, origin or gender ○ not suitable for children under 16 years of age • Reputational Risk: to protect Ramsay’s well-regarded brand, the Content Manager needs to remove any user-generated content that could in any way negatively impact on the public’s perception of the brand.
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<p>5.0 Brand guidelines for managing a social media</p>	<p>This section provides guidelines for Ramsay Staff in the effective engagement of social media communities.</p> <ul style="list-style-type: none"> • Tone: Appropriate tone is vital in the social media space to maintain a consistent and relevant persona with whom users will want to engage. Ramsay’s tone should be considerate of the following traits: <ul style="list-style-type: none"> ○ Be warm, friendly, approachable ○ Be reliable and factual ○ While language can include slang and colloquialisms, conversational English is Ramsay’s preference in maintaining a consistent and professional image ○ Doesn’t discriminate based on someone’s interests, age, situation or background ○ help people with their enquiries and ensure an appropriate follow-up is provided. However, medical advice should not be provided via social media • If you don’t know it, don’t fake it: Social media site users may pose questions or engage in conversation that is of a technical or specialised nature. Don’t participate if you are unsure of the accuracy of your content. If you don’t know the answer to a query, contact the appropriate key contact for their expert instruction. As noted above, Ramsay Staff should avoid giving any medical advice to users • Depth of relationship: Social media works on the basis of developing relationships with users. Content Managers) should work to engage users in valuable and meaningful relationships by way of participation in conversation, being approachable and friendly, providing helpful information and feedback. • Removal of posts: Outside of exceptional circumstances, posts should only be removed where they fall into legal risk areas (major risk areas identified above) or profanity is used. Posts that do not fall into these risk areas should be addressed with the help of the Group Marketing. • Pay attention to your content: You’ll be serving multiple social posts, so take time to read again through the dialogue to ensure
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	<p>you answer the right question. Re-read before hitting send. This includes fact-checking your statements for accuracy.</p> <ul style="list-style-type: none"> • Keep it private: Do not discuss or disclose the user's personal information.
<p>5.0 Creation of Ramsay & hospital or business unit branded social media accounts</p>	<p>The creation of Ramsay social media channels, e.g. hospital Facebook pages or twitter accounts, can only be undertaken by the Global Digital Strategy Manager within Group Marketing. If a Hospital, business unit or Ramsay entity wants to create a social media channel or account they must contact Group Marketing first in order to discuss the merits of doing so.</p> <p>At no time should an individual be managing a Ramsay social media channel without prior authorisation.</p>
<p>6.0 Using social media for personal use</p>	<p>This Policy does not discourage anyone from using social media in their personal life. However, everyone should recognise the potential risks that could arise (either directly or indirectly) during such use when they choose to make references to Ramsay or its Staff, services or customers.</p> <p>This Policy is designed to protect Ramsay and all related parties. If anyone is unsure about their personal use of social media in relation to work, please contact the Ramsay's Global Digital Media Strategist (see contact below).</p> <p>When using social media in a personal capacity and making references to Ramsay, Ramsay Staff must::</p> <ul style="list-style-type: none"> • ensure that comments are not misconstrued as representing an official Ramsay position; • incorporate the statement that you are not an official representative and that any comments or opinions are your own and not the official position of the Company; • not disclose or discuss any information about the Company that is not publicly available information; • not use Ramsay email address or any Ramsay logos (including hospital logos); • not use or disclose any confidential information or personal information obtained in your capacity as an employee (or contractor) of Ramsay; • ensure that your comments are respectful, non-defamatory; non-discriminatory and could not be considered as a form of harassment or bullying towards an employee/customer or contractor of Ramsay; • not breach intellectual property (eg: copyright) or privacy laws; • not bring Ramsay or any Ramsay facilities into disrepute; • not defame any Ramsay Staff member ; and • adhere to all other Ramsay policies including the Ramsay Privacy Policy. <p>It is recognised that use of social media at work can result in decreased productivity. To this end, when accessing social media via the Ramsay internet systems for personal use, employees must do so in accordance with Ramsay's IT Acceptable Use Policy [and Mobile Devices Policy] which requires use of Ramsay resources for personal use to be kept at a minimum and in a manner that does not interfere with your work and is not inappropriate or excessive.</p>

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7.0 Breach of Policy	<p>Breach of this Policy, or any Ramsay policy, could lead to disciplinary action. In serious cases, behaviour may be deemed to constitute gross misconduct and will result in summary dismissal in the absence of mitigating circumstances.</p> <p>The decision to take disciplinary action will depend upon a thorough investigation into each case including, but not limited to, whether the social media site was used to:</p> <ul style="list-style-type: none"> • bully, harass, discriminate against or vilify other Ramsay Staff; • publicise workplace disputes; • post defamatory comments; • disclose confidential information or intellectual property; • make unauthorised statements allegedly on behalf of Ramsay. <p>Bullying, vilification or harassment of any other employee, via social networking sites as described above or otherwise, will be considered a breach of the Ramsay Health Care Discrimination, Bullying and Harassment policy and subject to disciplinary action.</p> <p>Harassment might include but is not limited to using electronic media including email, internet and social networking sites to send offensive, sexually or racially offensive or harassing messages, images or photographs. Similarly, threatening messages or posts sent via email or through social networking sites, can constitute bullying.</p> <p>Staff should also be aware of their responsibilities in relation to patient privacy and confidentiality. Releasing sensitive information is prohibited on social networking sites as described above. Monitoring tools are in place to help Ramsay monitor conversations about the Ramsay brand online. This will include monitoring conversations on social network sites about Ramsay's facilities, services, staff, patients and doctors.</p>
<u>MORE INFORMATION:</u>	For more information on social networking the guidelines and rules surrounding this issue, please contact Ramsay's Global Digital Strategy Manager within Group Marketing at socialmedia.RHC@ramsayhealth.com.au
<u>RELATED POLICIES, PROCEDURES & GUIDELINES:</u>	<p><i>Ramsay Code of Conduct</i> <i>Workplace Discrimination & Harassment Policy</i> <i>Confidentiality Privacy & Intellectual Property Policy</i> <i>Workplace Diversity Guidelines</i> <i>IT Acceptable Use Policy</i> <i>Communications Policy</i> <i>Ramsay Continuous Disclosure Policy</i></p>
<u>DOCUMENT RETENTION:</u>	
<u>Authorisation / Ratification:</u>	Risk Management Committee

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DOCUMENT HISTORY

ISSUED DATE [Revision]	Document Version	Next Review Date	Author Review Team	Owner Controller	Ratified Approved [Board delegate]	Document History / Revision
29 Nov 2011	1.0	Nov 2014	Carmel Monaghan	Marketing	Risk Management Committee	Ratified by the Risk Management Committee
4 June 2016	2.0	June 2018	Joel Bowerman	Group Marketing	Ratified by the Risk Management Committee on	Approved by the Ramsay Health Care Limited Board on 21 June 2016

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