

SOCIAL MEDIA POLICY

POLICY ADDENDUM

FOR ALL NAURU AND MANUS ISLAND WORKERS

NATURE OF THIS POLICY

This document is an addendum to the Social Media Policy, and deals with the specific application of the Social Media Policy to employees and contractors (**Workers**) who are engaged by Transfield Services to perform work in relation to the offshore processing of transferees at Nauru and Manus Island in Papua New Guinea. These operations will be referred to in this Policy as the "**Operations**," and transferees who are processed at Nauru or Manus Island will be referred to as "**Transferees**".

PURPOSE OF THIS POLICY

Due to the nature of the Operations, there is a heightened risk that the publication of information or comments about the Operations may pose a risk to the Operations, Transferees and/or Workers, or damage the business or reputation of Transfield Services (including its relationship with the Australian Government).

Further, the Department of Immigration and Border Protection (**Department**) has imposed strict obligations on Transfield Services and its Workers in relation to the conduct of the Operations.

These obligations include:

- (a) a requirement that Workers do not permit any situation to arise or engage in any activity during the provision of services in relation to the Operations which may result in a conflict of interest; and
- (b) a requirement that Workers do not publish or communicate (other than to an authorised person) any fact or document which has come into their knowledge or into their possession due to the performance of their work in the Operations.

These obligations are recorded in a Confidentiality Deed with the Department which Workers are required to execute before working in the Operations. Workers are expected to act consistently with the Confidentiality Deed and their status as persons performing services for or on behalf of the Department.

The purpose of this Policy is to assist Transfield Services manage these obligations and minimise risks to the Operations and its business.

SERIOUS CONSEQUENCES OF BREACH - NO TOLERANCE

It is very important that Workers familiarise themselves with this Policy. Because of the potential consequences of breaches, Transfield Services will treat any breaches of this Policy very seriously. A breach of this Policy may result in disciplinary action up to and including instant dismissal.

Workers should also note that the publication or communication by Workers of any fact or document that has come to their knowledge or into their possession or custody as a result of working in the Operations to a person who does not have authority to receive this information may be an offence under the *Crimes Act 1914* (Cth), which may result in prosecution and punishment.

SOCIAL MEDIA AND OTHER FORMS OF COMMUNICATION

This document applies to the publication of information during working hours or after hours during a Worker's personal time. It applies to information posted on Social Media using either facilities provided by Transfield Services or personal technology owned by the Worker. It also applies to all other types of communications (e.g. by letter, fax, and any other form of publication).

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For the purposes of this Policy, "**Social Media**" is defined broadly and includes:

- any form of communication via the internet or intranet (including email);
- Discussion forums and email distribution lists;
- Facebook, MySpace, Plaxo etc.;
- Blogging (e.g. Yammer, Blogspot) and micro-blogging (e.g. Twitter);
- Video sharing (e.g. YouTube) and photo sharing (e.g. Instagram, Flickr);
- Podcasting (an audio digital media file that you can listen to via a website or download);
- Newsgroups (e.g. Digg, Mixx); and
- Self-moderating user contribution sites (e.g. Wikipedia).

PROHIBITIONS

Incompatible material

A Worker must not post, send, publish, distribute or provide access to any of the following material, whether by Social Media or any other method, and whether or not this material is critical or complimentary:

- (a) material which concerns or relates to the Operations, regardless of whether or not this material is directed at Transfield Services, the Department or any other party;
- (b) material which concerns or relates to the treatment of Transferees in relation to the Operations;
- (c) material which concerns or relates to the Department, and in particular, its policies in relation to the Operations;
- (d) material (including links and contact information) regarding persons, organisations or action groups which are critical of the offshore processing of transferees, the Operations, or the policies of the Department (Incompatible Organisations); and
- (e) material which may damage the business or reputation of Transfield Services, embarrass Transfield Services, or injure its relationship with the Department.

The above material will be referred to in this Policy as "**Incompatible Material**".

A Worker must not assist anyone else to do the above.

Engagement with Transferees

A Worker must not correspond in writing with a Transferee or an ex-Transferee via Social Media except where expressly authorised by Transfield Services in writing.

A Worker must not give a Transferee or an ex-Transferee a personal email or contact address of the Worker or any person associated with the Worker.

A Worker must not give a Transferee or an ex-Transferee access to the Worker's Social Media (such as a Facebook site) or any person associated with the Worker.

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A Worker must use his/her best endeavours to check that any person who seeks access to the Worker's Social Media is not a Transferee or an ex-Transferee.

A Worker must not provide Transferees or ex-Transferees with information (or access to information) which is Incompatible Material.

A Worker must not assist anyone else do the above (e.g. by assisting them communicate with Transferees).

Disclosure of Information or comment to third parties

A Worker must not disclose any information about the Operations or comment on or express an opinion on the Operations (including the treatment of Transferees) EXCEPT in the proper course of their employment to persons authorised to receive the information by Transfield Services.

For the avoidance of any doubt, this prohibition includes disclosures to friends and family on Social Media.

Incompatible Conduct

In his/her capacity as a Transfield Services employee or contractor, a Worker must not engage in any activity which may result in a conflict of interest with the conduct of the Operations on behalf of the Department. This includes the following types of conduct:

- (a) promoting, showing support for, or maintaining a membership with an Incompatible Organisation; and
- (b) showing support for the closure of offshore processing centres by engaging in activities such as public rallies or demonstrations.

Refer to Transfield Services' Political Involvement and Support Policy for further information.

Removal of Information

Transfield Services may request that Workers avoid certain subjects or withdraw certain content from Social Media, if Transfield Services believes that this material is likely to damage its business, bring Transfield Services into disrepute, pose a risk to the Operations, Transferees and/or Workers, or otherwise contains Incompatible Material.

Investigations

Workers are expected to co-operate fully with any investigation of breaches of this Policy. This includes providing full and frank responses to any questions asked about a potential breach and also allowing appointed officers of Transfield Services to access information on their Social Media, where Transfield Services has a reasonable basis to suspect that a breach involving Social Media may have occurred.

Legitimate Concerns

This Policy is not intended to restrict a Worker from raising legitimate concerns regarding the Operations or the treatment of Transferees. In fact, Workers are encouraged to do so through the proper channels, for the purpose of enabling Transfield Services to deal with these issues.