

COMMUNICATION POLICY

In our work, we all deal with information and communication in many different ways. We need to carefully consider the risks associated with all these activities. Uncontrolled communication or unauthorised disclosure of any information, photo, video, document whether in hardcopy, in email or (social) media could damage our reputation or result in legal action or even being blacklisted to work for clients.

Communication is the effective exchange of meaning or understanding in formal and informal communication. It applies to communication up, down and across the organization. Everyone in the organization is accountable for the effectiveness of his or her own communication. This especially applies to those who manage others.

Although we know that in most cases it is done with the best intention, unauthorised communication or disclosure of any business related activities of the Roll Group is a risk for the whole group and is therefore not allowed.

Data Privacy

Data privacy laws protect personal data of individuals. Roll Group fully respects the privacy rights of our employees, customers, agents, subcontractors and the like.

Personal Data is any information relating to an identified or identifiable individual such as name and contact details. Information which is more private, such as race, origin, health data, sexual orientation, criminal behaviour is sensitive personal data and subject to very stringent requirements. Personal Data may only be processed for legitimate purposes and the data must be accurate and relevant for the purpose it was collected. In addition, it is a legal requirement that it must be protected from inappropriate access or misuse. If you have any question or doubt whether a request for personal data is for a legitimate purpose, contact the legal department.

Business Communication

We communicate in all sort of ways. Everything we write or say will reflect on the Roll group and the reputation of the Roll Group. Whatever medium you use, the communication must always be done honest, appropriate, respectful and accurate. Information given must be complete, factual and without any assumptions.

No information (including any photo, video, tweet, or other post on social media etc.) on Roll Group activities, including its clients and projects, may be disclosed unless you are authorised to do so. Any unauthorised communication could harm the Roll Group, its clients and stakeholders.

Clients increasingly require us to sign non-disclosure agreements or require such confidentiality incorporated in the contract. We are in most cases not entitled to disclose any information on the project, including photos and videos, without the prior written approval of the client.

In any communication it is vital to make sure that the information you provide is fully consistent with the message you want to convey. Providing inaccurate, incomplete or misleading information about Roll Group, its client, other business partners or competitors is prohibited and may be illegal.

(Social) Media

Social media can be a fun and easy way to share your photos, videos, thoughts, feelings, opinions and (social and business) experiences. However, use of social media also presents certain risks and carries with it certain responsibilities.

Social media is understood as websites and applications that enable users to create and share content or to participate in social networking. It is the collective of online communications channels dedicated to community-based input, interaction, content-sharing and collaboration. Websites and applications dedicated to forums, microblogging, *social* networking, *social* bookmarking, *social* curation, and wikis are among the different types of social media. Examples are Twitter, Facebook, Snapchat, LinkedIn, YouTube, Instagram etc.

Before using social media and posting content, keep in mind that any of your conduct on social media will always be available and/or traceable on the worldwide web, whether or not you have deleted any content. Any content can also have an adverse effect on your personal life, reputation and (job) opportunities.

Roll Group does not allow you to use your personal social media for business purposes or to communicate on behalf of the company on personal social media. Likes, retweets, reposts or other links to official business communication or social media accounts of the Roll Group is allowed.

All Media contacts or request should be directed to the Group Corporate Communication Department. Without prior and specific authorisation employees must not talk to the media on behalf of the Roll Group or in respect of the Roll Group activities.

Authorisation

Authorisation as described in this policy can be given by your Managing Director or the Group Corporate Communication Department. The Managing Director must before authorisation is granted consult the Group Corporate Department or the Group Board of Directors. All authorisations may only be given if it in the best interest of the Roll Group.

Non Compliance

Noncompliance with this communication policy can harm the Roll Group, employees, stakeholders and clients and could therefore be subject to disciplinary action.