

Digital Media Policy

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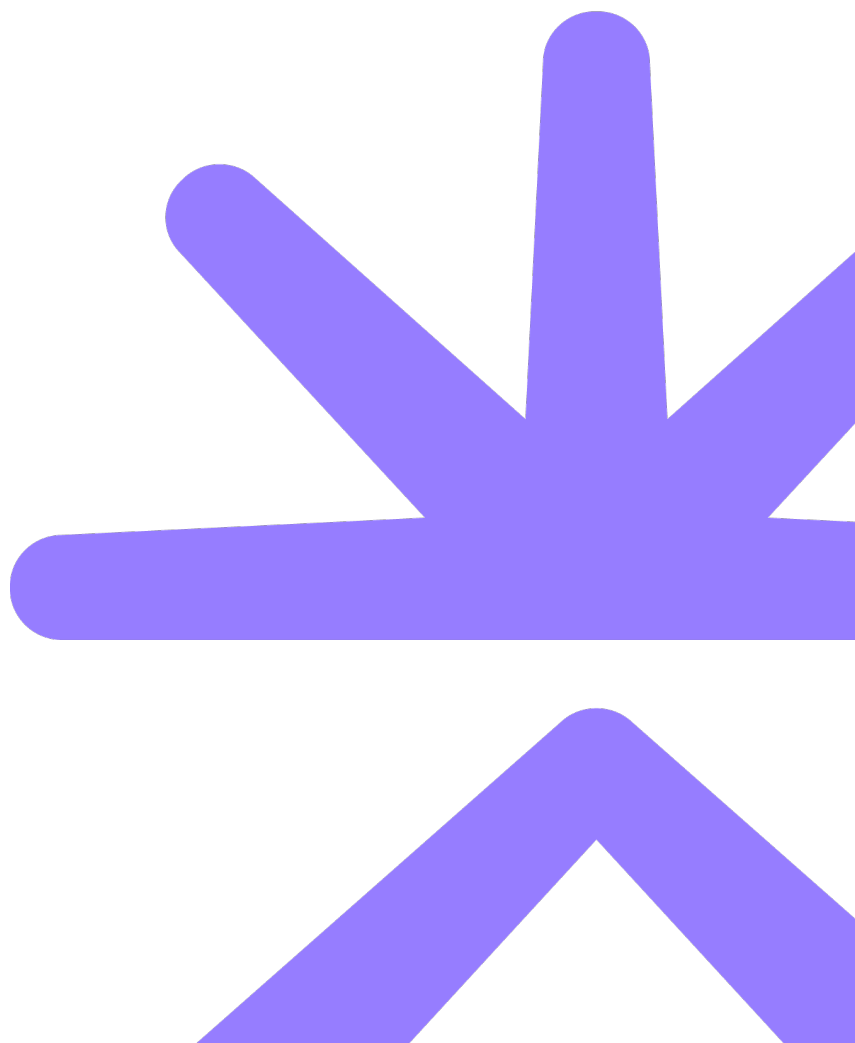


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1. Policy overview

1.1 Policy statement

This Helia Digital Media Policy Statement ("Policy Statement"):

- Sets out Helia's high level requirements for the management of all areas of digital media
- Defines the objectives for the use of digital media for the business
- Identifies the application of digital media to the business.

1.2 Purpose

This policy governs the operational procedures and process in relation to digital media. This information can be located in the Policies folder on the OCF drive.

It details the Company's policy in relation to digital media and provides a detailed explanation of relevant responsibilities for all levels of staff, contractors, partners and third parties.

It also lists the Company's compliance status against applicable Australian State and Federal laws, regulations and industry standards.

1.3 Scope

This document specifically addresses:

- Day-to-day digital media operations
- Protocols for use of digital media
- Individual and team responsibilities with reference to these operations
- Should be used for reference purposes when the Company undertakes its annual compliance review. At that time it should be reviewed by all parties involved with the Company's digital media operations.

The Company's digital media activities covers three specific areas:

- **Corporate websites.** This encompasses outward facing sites, whether they allow interaction with users or not. These include dedicated campaign subsites
- **Social media.** This encompasses sites which enable interaction with and between users. These can include web blogs, media sharing sites and digital communities
- **Mobile media.** This encompasses technology used with mobile devices and which can incorporate factors such as current location, time delay, etc. These include mobile sites and apps.

Practically, there can be a significant degree of overlap between these three areas, and the policy defined in this document should be synchronous with all three.

1.4 Procedural updates and training

This document will be included as part of onboarding training for new staff and will be held in the OCF (Operational Control Framework) library for internal staff to access when required.

2. Legal and compliance requirements

2.1 Legal requirements

The list below summarises the scope of regulatory and legislative requirements that must be met through this policy:

- Website – Australian Securities and Investments Commission (ASIC)
- Meta Business - Content distribution guidelines (for Facebook, Instagram)
- YouTube - Community Guidelines and Policies (for You Tube).

2.2 Compliance requirements

The list below summarises the internal standards that must be complied with:

- Helia Proper use of Technology Policy
- Helia Privacy Policy
- Helia Media Relations Policy
- Helia Operational Procedure for Websites
- Helia Workplace Standards Policy
- Any other applicable internal Policies that apply from time to time.

2.3 Penalties and consequences

Non-compliance with this policy exposes the company to regulatory sanctions including fines and undertakings.

Non-compliance by an employee will be treated as a performance matter and may result in disciplinary action.

Additionally, non-compliance with this policy may lead to brand damage which may have either reputational or financial implications for the company.

2.4 Review and update of the policy statement

This Policy Statement and associated company policies are reviewed at least annually (or more frequently if required) by Helia's Marketing and Communications teams to ensure the business:

- Meets its compliance obligations to digital media
- Maintains its relevance to the business' current and planned digital media operations
- Mitigates the risk of brand and reputational damage.

3. Operating principles and guidelines

3.1 Privacy

All activities conducted under this Policy will be carried out in accordance with the Helia Privacy Policy.

3.2 Accountability

Ownership and updates of digital media are restricted to the Marketing and Communications teams in order to ensure consistency and mitigate any business, legal or reputational risk.

Likewise, review processes are in place to ensure that any digital media contains current and accurate content and has been validated by appropriate parties within the business.

Regarding spokespeople:

- Only approved spokespeople may comment about Helia in a public forum.
- An approved spokesperson must disclose that any such comment or statement is being made on behalf of the Company. In addition, an approved spokesperson should always disclose his/her identity and position within Helia.

3.3 Corporate websites

Helia maintains a website presence to provide information about the Company, its operations and the services which it offers.

3.3.1 Scope

The Company maintains the following websites in Australia and NZ:

- <http://www.helia.com.au/>
- <http://www.helia.com.au/nz/>

3.3.2 Approvals

Approval to follow the Helia Operational Procedure for Websites document.

3.3.3 Maintenance

Websites are to be monitored and reviewed for currency on a monthly basis.

The website is owned and managed by the Marketing team within the Commercial Solutions team. The team own the overall look, design and tone of the website and are responsible for general marketing related content as well as keeping it modernised to current trends to drive use and accessibility.

All individual department pages held on the website are owned by the individual department leaders and they are responsible for reviewing their department's content and updating where required to always ensure accuracy.

Any relevant changes and updates must be coordinated through the Marketing team.

The Investor sections of the websites are solely owned and managed by the Investor Relations team.

3.4 Social media

Social media can broadly be defined as digital media that enables users to extract, present and share information.

3.4.1 Scope

Helia currently engages in the following avenues of social media:

- LinkedIn
- YouTube
- Facebook

3.4.2 Approvals

The publishing of all content on social media is required to be:

- Reviewed by the Head of Marketing and CCO
- Approved by the Head of Marketing, CCO or delegate appointed
- Compliant with the requirements of the Disclosure Policy in relation to the information contained therein.

Employee interaction

When using social media, Helia employees must protect themselves and Helia's brand, reputation and assets. Failure to comply with the Digital Media Policy could result in an adverse employment action, and even may subject an employee to liability from third parties. Consequently, users should give regard to:

- Antitrust concerns
- Insider information
- Confidential information
- Intellectual Property
- Privacy.

Whether or not they are using a Helia electronic facility, employees must:

- Be aware of the Company's
 - Code of Conduct
 - Proper Use of Technology Policy
 - Media Relations Policy.
- Refrain from inappropriate employee comments on social media
- Refrain from representing themselves as representatives of the Company unless specifically sanctioned to do so by an authorised manager
- Refrain from disseminating confidential information on public sites
- Refrain from disclosing non-public information
- Refrain from divulging or speculating upon Helia's intentions or future actions.

3.4.4 Public comments and social media

Except as provided in the Disclosure Policy, no Company Employee may make external comments (whether orally or by publication) regarding the Company's business or operations prior to a release through the ASX of the comment and without authorisation from the Company Secretary.

This general prohibition includes comments via the internet, social media or social networking technologies. For example, Helia Employees should not comment about Helia or its business or operations on:

- External networking sites (e.g., Facebook, LinkedIn, Instagram)
- Online discussion forums and blogging sites, including microblogs (e.g., Twitter)
- Video and photo sharing sites (e.g., YouTube, Flickr, Instagram)
- Online encyclopaedias (e.g., Wikipedia), or
- Any other websites that allow individual users to publish information.

3.4.3 Sharing information on LinkedIn

Approved content published by Helia may be shared through personal LinkedIn accounts. This includes content published by the CEO and shared in accordance with the Code of Conduct Policy.

3.4.4 Authorised contact with media

In line with the Media Relations Policy, only team members who have been authorised to speak to media, including digital media, may have contact with media. If any team member has contact from digital media through their LinkedIn account in relation to Helia, please refer the query on to the Marketing Specialist.

3.4.5 Authorisation to publish information

The Marketing and Brand Leader only is authorised to publish content for Helia through Helia social media accounts.

The Head of Communications and Sustainability only is authorised to publish content on behalf of the CEO through the CEO's social media accounts.

3.4.6 Personal social media accounts

Any information related to Helia should not be shared on social media accounts held in your personal name. This excludes LinkedIn which is subject to procedures listed in clause 3.4.4

Helia recognises that employees may wish to use social media in their personal life and this Policy does not intend to discourage nor unduly limit personal expression or online activities. However, even if your social media activities take place completely outside of work, what you say could impact Helia's reputation and business interests. All employees should comply with this Policy to ensure that the risk of any damage is minimised.

4. Roles and responsibilities

This section identifies the individual roles (by title) and responsibilities associated with the management/implementation of this policy.

4.1 Marketing and Brand Leader

- Currency of this Policy, including a minimum biennial review of the policy
- Alignment of process and procedures to this Policy
- Develops digital strategy and ensures the brand, positioning and messaging is correctly used across all digital media
- Review all material content and design changes to the Company's digital media
- Ensure the accuracy and currency of the digital media and all parts thereof is maintained with effective processes in place to manage this
- Management of review processes and obtaining legal/compliance sign off.

4.2 Marketing Specialist

- Day-to-day update and maintenance of digital media
- Management of review processes and obtaining legal/compliance sign off.

4.3 Head of Communications and Sustainability

- Currency of this Policy, including a minimum three-year review of the Policy
- Alignment of processes and procedures to this Policy
- Approved publication of digital media related to and on behalf of the CEO.

4.4 Legal/Compliance

- Reviews substantial content changes e.g., creation of new content pages referred by the Marketing team
- Review comments and content additions/posts to social media pages referred by the Marketing team
- Reviews and handles negative user posts referred by the Marketing team
- Reviews posts prior to publication on CEO's social media.