

Social Media Policy



ALTITUDE
ASSET MANAGEMENT

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Responsible Business Unit	Management

Social Media Policy

1. INTRODUCTION

Social media has become a regular part of everyday communication. It has expanded beyond the corporate marketing team and touches every aspect of financial services communications. From advisors to executives to employees, every individual has a voice on social media and the potential to influence customers. As a result, multiple departments across financial services organisations are using social media strategically and effectively to deliver real business results—even within the confines of strict compliance regulations.

Social media is rapidly changing, and these policies evolve along with it. Check back frequently to make certain the policies have changed to keep pace.

2. POLICY PURPOSE

Altitude Asset Management recognizes the need to have a policy and guidelines, which ensure that those who use social media, either as part of their job, association with Altitude Asset Management or in a personal capacity, have guidance and an understanding of best practice where social media is used, and to be aware of the potential issues and risks that can arise from misuse. Altitude Asset Management expects that its employees and affiliates who contribute to social media will familiarize themselves with this policy and related guidelines and will act responsibly in references to Altitude Asset Management in their social media and online activities. This policy should be read and applied within the framework of Altitude Asset Management's rules, regulations, policies, and procedures and in conjunction with Altitude Asset Management's relevant internet-related policies such as the Terms and Conditions of Use and the Acceptable Use Policy.

3. DEFINITIONS

Social Media is a broad term used to describe a range of online tools such as websites, web-based platforms and applications that are designed for online interaction, content consumption and to generate content. Examples of social media applications, channels and platforms include Facebook, Google Plus, Twitter, Tumblr, Snapchat, WordPress, Blogger, Wikipedia, Amazon ratings, Flickr, Instagram, YouTube, Vimeo, Viddler, Facebook Messenger, WhatsApp, Google Hangouts, chat rooms, email, etc. This list is fluid as social media continues to evolve and different applications replace others.

4. STATEMENT AND SCOPE

As an employee and representative of Altitude Asset Management, you are expected to demonstrate best business practices and appropriate etiquette on social media. Personal and professional use of social media by Altitude Asset Management's employees must not amount to misconduct. Misconduct comprises behavior within or outside the precincts of Altitude Asset Management, or whilst on official business of or representing Altitude Asset Management, which

- Constitutes a breach of any regulation or rule of Altitude Asset Management;
- Constitutes a failure or refusal to obey a lawful order;
- Constitutes conduct that tends to bring Altitude Asset Management, or any part of it, or any employee into contempt or disrepute; or
- Interferes with the governance and proper administration of Altitude Asset Management.

5. PRINCIPLES

a. GENERAL CONDUCT

Depending on the context, employees may be seen to be representing Altitude Asset Management and should, at all times, act with due care, consideration and responsibility on all social media fora. Particularly,

- Users may not make official statements on behalf of Altitude Asset Management unless they are duly authorised to do so.
- Employees are to identify themselves as representatives of the company when posting or commenting on Altitude Asset Management's products and services. If employees talk about Altitude Asset Management on any website or any form of social media, use a disclaimer like this one: "All opinions are my own".
- If an employee has a vested interest in something they are discussing, they should be the first to point it out and be specific about what it is.
- Stick to your area of expertise. Only write about what you know. If you're not an expert on the subject, refer people to someone who has that expertise.
- If an employee leaves Altitude Asset Management, they must remember to update their employment information on social media sites.

b. PROTECT ALTITUDE ASSET MANAGEMENT

Keeping Altitude Asset Management's confidential information confidential is a keystone of our business. Many employees know things about the company that could affect our business. It is essential to safeguard Altitude Asset Management's information, especially on the internet.

- Anything you publish must be true and not misleading, and all claims must be substantiated and approved.
- Do not post any confidential information on any social platforms. If the information has not been officially released by Altitude Asset Management, don't discuss it. This includes financial information, product information, and legal information.
- If you are unsure whether to post something, err on the side of caution and don't.

c. COPYRIGHT AND FAIR USE

Not everything on the internet is free to use. Just because it's easily accessible, doesn't mean that you're not infringing on copyrights if you share it. For example, you can't just find an image in a search engine and share it without giving credits to the photographer. By doing this, you're infringing on copyright laws, and could get in trouble if the artist/photographer decides to take action against you.

- Employees are to give proper credit when sharing articles, images, videos, and other content.

d. CHOOSE YOUR TOPICS WISELY

- Never participate in a Social Media conversation when the topic being discussed may be considered a crisis for Altitude Asset Management. Even leaving anonymous comments can be traced back to you or Altitude Asset Management through your IP address.
- Refrain from participating in sensitive topics, such as religion or politics. Conversations around that nature often result in heated debates.
- Don't slam the competition or Altitude Asset Management. Make sure you speak diplomatically and have the facts straight.
- Remember, there's a fine line between healthy debate and provocative reactions.

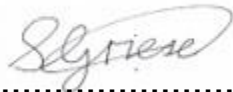
e. USE COMMON SENSE

- Did you mess up? It happens. If you make a mistake, admit it immediately. Apologize if you need to. Be upfront and correct the error as soon as possible.
- If you choose to modify an earlier post, make it clear that you have done so.
- Additionally, if you see something being shared related to Altitude Asset Management on a social media platform that shouldn't be happening, immediately inform Altitude Asset Management's management.

6. CONSEQUENCE OF BREACH

Breach of this policy will be dealt with in accordance with Altitude Asset Management's Code of Conduct for Employees and/or other relevant policies, which may lead to disciplinary action or other relevant sanctions. Where inappropriate use under this policy constitutes a breach of any law, action may also be taken in accordance with that law by Altitude Asset Management or concerned third parties.

Signed on this 1 day of JUNE 2024



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(CEO//Key Individual/Manager)