

NEW OCEAN SHIPMANAGEMENT PTE LTD (NOSM)

Social Media Policy

1. Background

This NOSM Social Media Policy is intended to provide all employees both at sea and in our offices (collectively, "Employees") of NOSM with a basic policy on the use of social media networking:

Social Media Networking:

Generally includes all types of postings and/or interaction on the internet, including, but not limited to, social networking sites, (such as Facebook®, MySpace® or LinkedIn®), blogs and other online journals and diaries, discussion boards and chat rooms, microblogs such as Twitter®, 3rd party rating sites such as Yelp®, smartphone applications, multimedia host sites (such as YouTube® or Flickr®) and similar media. Social networking activities may also include the permission or refusal of posts by others where an individual can control the content of postings.

Social media is a valuable, easy-to-use service and tool. However, using it in the **wrong** way may not only damage business confidence in NOSM and NOSM's image in the global shipping and maritime markets, but could even lower confidence so far as to endanger NOSM's existence as a company.

2. Social Media Policy

2.1 Scope

Every Employee of NOSM both at sea or ashore, regardless of his/her organizational unit or form of employment, will comply with the following:

- Be aware and adhere to ALL NOSM's Company Policies when using social media in reference to NOSM as a Company, employees and affiliates
- Be aware of the obligation to avoid conduct that may violate applicable law or NOSM policies or that may trigger claims of discrimination, harassment and retaliation which may lead to business, legal and personal risks that may arise from an individual's use of social media, both during work time and non-work time;

2.2 To realize that what is said as a private person may be understood as spoken on behalf of NOSM

To remember that he/she is an Employee of NOSM and take care not to mislead his/her readers/followers into thinking that he/she is speaking on behalf of NOSM, whether or not he/she mentions NOSM in the post.

- To avoid stating his/her personal opinions or views in a way that may be interpreted as a public statement made on behalf of NOSM.
- Individuals must speak for themselves and not on behalf of the NOSM unless authorized to do so as part of their job responsibility

Employees should be aware that NOSM may observe content and information made available by employees through social media. Employees should use their best judgment in posting material that is neither inappropriate nor harmful to NOSM, its employees, or affiliates.

2.3 Compliance with applicable laws and regulations and NOSM' regulations

To comply with laws and regulations, NOSM' policies and regulations, and not to infringe any intellectual property right or other right of others.

- Subject to applicable law, after-hours online activity that violates NOSM company's policies may subject an employee to disciplinary action or termination.
- No employees shall be permitted to publish content after-hours that involves work or subjects associated with NOSM
- Social media use shouldn't interfere with employee's responsibilities at NOSM. NOSM's computer systems are to be used for business purposes only. When using NOSM's computer systems, personal use of social media networks or personal blogging of online content is discouraged and could result in disciplinary action.

2.4 To be honest and responsible

- To be responsible for what he/she has posted.
- To realize that his/her post may be seen by an unspecified large number of people and respect that readers/viewers may make their own individual interpretations on his/her post.
- To respect the rights of the person he/she is posting about and the opinions of his/her readers.
- Not to post images of current or former employees, members, vendors or suppliers without getting appropriate permission
- Not to post anything that offends accepted social standards of decency.
- Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, racism, politics, religion or that can create a hostile work environment.

2.5 NOSM corporate identity

- Individuals may not use NOSM logos, company's name, trademarks or proprietary graphics that would create the appearance they are speaking on behalf of NOSM without prior authorization from the management of NOSM.
- Under no circumstances may Individuals post fake blogs, create false positive or fake negative reviews of NOSM, its affiliates, policies, services and or its competitors; nor may individuals impersonate someone associated with or speaking about NOSM.

2.6 To respect the confidentiality of certain information

- Not to post any personal or confidential business information about NOSM or NOSM' stakeholders for example shareholders, principals, bankers, insurers, suppliers, Class Societies, Flag States, etc.
- Not to post or to use a third party's copyrights, copyrighted material, trademarks, service marks or other intellectual property without appropriate permission
- Not to post, publish or release any information that is considered confidential or not public. If there are questions about what is considered confidential, employees should check with the Supervisor and/or management.
- Individuals shall not use social networking activities, including personal e-mail and mobile (text) messaging, to transmit, receive, or store information regarding NOSM, its employees or affiliates that is illegal, discriminatory, harassing, libellous, slanderous, or which is considered Confidential Information.

2.7 To realize that information once posted online cannot be deleted

Employees of NOSM should be aware of the effect their actions may have on their images, as well as NOSM's image. The information that employees post or publish may be public information and once posted online may be unable to completely delete and may be publicly available for a long time.

2.8 To realize how fast information spreads online

To make a post upon the understanding that it is quite easy to copy and cite the information posted online and it may fast spread to other media.

2.9 At time of crisis - NO USAGE OF SOCIAL MEDIA

In times of a crisis for NOSM, either via a vessel we manage or another asset in difficulty situation which may attract public/media attention, social media is an easy means for attaining information by interested third parties.

STRICTLY NO usage of social media by any employee of NOSM during a time of crisis for NOSM. No employee shall be permitted to refer directly or indirectly to an incident in which the NOSM and/or the employee are involved in any of the social media websites.

To be aware that emotional communication in a crisis situation (for example a casualty situation on board one of our managed vessels) is very likely to prolong unnecessary commentary, increase misunderstanding and make the situation worse.

Any NOSM employee noted to have violates any one of NOSM company's policies will be subjected to disciplinary action and/or immediate dismissal.

01 April 2017



Capt. Ryuichi Takebayashi
Managing Director