

## **Ingwelala –Media Policy**

### **1. Definitions**

The following words shall, unless otherwise stated or inconsistent with the context in which they appear, bear the following meanings:

- 1.1 **APNR** – Association of Private Nature Reserves;
- 1.2 **Authorised Users** – an immediate family member nominated by the main member;
- 1.3 **Board** – the Board of Ingwelala;
- 1.4 **Ingwelala** – a privately owned Share Block Nature Reserve;
- 1.5 **Ingwelala Community** – Members and Authorized Users;
- 1.6 **KNP** – the Kruger National Park;
- 1.7 **Member** - member of the Company reflected as such in the Register of Members of the Company;
- 1.8 **SANParks** – South African National Parks;
- 1.9 **UPNR** – Umbabat Private Nature Reserve.

### **2. Introduction**

- 2.1 Ingwelala is committed to managing the sustainable conservation of natural resources through the implementation of best practice ecological, environmental and economic principles for the beneficial enjoyment of shareholders and as a moral obligation to the environment. Ingwelala requires the support of all Members to achieve these objectives.
- 2.2 The Ingwelala Community has an interest in the use and enjoyment of Ingwelala as well as the protection of Ingwelala's reputation.
- 2.3 The Board is mindful of the increasingly important role that the media, and in particular social media, plays in the personal and professional lives of the Ingwelala community. However, the achievement of Ingwelala's objectives can, in certain instances, be undermined by the irresponsible or inappropriate use of social media, or the making of inappropriate comments to the media generally or on social media in particular.
- 2.4 The Board has therefore developed this policy to guide the Ingwelala Community on responsible interactions with the media and the use of social media in the best interests of Ingwelala, the Ingwelala Community, and the natural resources it exists to protect. All members of the Ingwelala Community are expected to understand and comply with the rules and principles set out in this policy.
- 2.5 In all cases, members of the Ingwelala Community are expected to exercise their best judgment when making comments about Ingwelala and its

affiliations in the media generally and through social media in particular and to remember that they have a shared obligation to protect the interests of the Ingwelala name and brand in the interests of all Members. The exercise of this judgment extends to persons over whom the Ingwelala Community members have influence or control, such as their immediate family members, and Ingwelala Community members are required to ensure that the persons over whom they have influence or control similarly respect this media policy.

- 2.6 The Board recognises the need to have a media policy which ensures that the Ingwelala Community is aware of the potential risks to Ingwelala and the Members associated with interaction with the media and the use of social media in particular.

### 3. **Scope and application of Policy**

- 3.1 This policy applies to all Members and Authorised Users and such persons over whom they have influence or control.
- 3.2 This policy covers all media, including all social media platforms, for example, LinkedIn, Facebook, Twitter, YouTube, WhatsApp, blogs, chat rooms and forums, podcasts, photo or video sites, and any other online social media permitting responses, comments or other content generated by users.
- 3.3 The provisions of this policy are applicable to the expression of opinions and comments published by Ingwelala Community members in the media or on any social media platform as well as any material that they may re-post or share which then makes them a secondary publisher of that information.

### 4. **Media guidelines**

- 4.1 The comments, expressions and other postings by members of the Ingwelala Community in the media generally and on social media platforms in particular must be honest and respectful of the interests of Ingwelala and the Ingwelala Community.
- 4.2 The comments, expressions and other postings must also take into account that Ingwelala is a member of various other institutions and as such has signed agreements with the APNR.
- 4.3 Members of the Ingwelala Community may never post anything that damages or has the potential to damage the good name and reputation of Ingwelala, its Board or other Members, as well as the various agreements Ingwelala has signed with the UPNR and the APNR, which are also party to co-operative agreements with the KNP which is run by SANParks
- 4.4 Members of the Ingwelala Community may not use the media generally and social media platforms in particular as a forum to lodge complaints against Ingwelala, the Board, or other Members. If any members of the Ingwelala Community wish to complain about the activities of Ingwelala, the Board, or other members, they should raise the issue directly with the Board in writing.
- 4.5 Members of the Ingwelala Community should remember that anything they post on a social media platform are comments and posts made in a public forum and these comments are not the views of other Members or Ingwelala

and that any claims arising from these comments may be against those members of the Ingwelala Community in their personal capacities..

- 4.6 Members of the Ingwelala Community must not share the personal or confidential information of Ingwelala, the Board, and other Members in the media or on social media platforms.
  - 4.7 Without limiting the members of the Ingwelala Community's use of social media, members of the Ingwelala Community should not post or share on social media:
    - 4.7.1 information or statements which may be detrimental to the interests of Ingwelala, the Board, or other Members;
    - 4.7.2 information or statements that harm or have the potential to harm the good name and reputation of Ingwelala and the associations it belongs to;
    - 4.7.3 any communication or image which may be defamatory or violate the rights of any party;
    - 4.7.4 any communication which is offensive, threatening, abusive, harassing, promotes cyber bullying, incites violence, or is harmful or hateful;
    - 4.7.5 derogatory statements; or
    - 4.7.6 any statements that cause or have the potential to cause disharmony amongst the Members of Ingwelala and its membership within the UPNR and APNR.
- 5. Permitted use of media platforms for purposes related to shareholding**
- 5.1 Members of the Ingwelala Community using any media, including social media platforms, for purposes related to their shareholding in Ingwelala, or which may in any manner link such use with Ingwelala, shall:
    - 5.11 if they have the authority to make statements on behalf of Ingwelala, clearly indicate such authority as Ingwelala will not condone unauthorised comments;
    - 5.12 if they do not have authority to make statements on behalf of Ingwelala, clearly indicate that the statement is their own opinion and does not represent the opinion of Ingwelala, the Board, any other Member or any other Authorised User; and
    - 5.13 otherwise, adhere to the principles set out in this policy
- 6. Monitoring use of social media platforms**
- 6.1 The Board will monitor content on the accessible pages of members of the Ingwelala Community's social media accounts to ensure compliance with the terms of this policy.
  - 6.2 Misuse of social media platforms can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal liability against Members. It may also cause embarrassment to Ingwelala and potential liability claims due to loss of income or reputational damage to our partners in the UPNR and APNR. Members of the Ingwelala Community are required to act responsibly

and with integrity at all times when using social media, whether privately or in their capacity as Members.

**7. Breach**

- 7.1 Any members of the Ingwelala Community who fail to comply with the provisions of this policy will face a potential penalty fine, the amount of which shall be determined at the sole discretion of the Board.
- 7.2 The actual penalty applied will depend on factors such as the seriousness of the breach and the degree of harm suffered by Ingwelala, the Board, and other Members.
- 7.3 Any breach of this policy may also give rise to personal liability claims against individuals who incorrectly represent the view of Ingwelala and its Members without the consent from the Board.