

SOCIAL MEDIA ENGAGEMENT GUIDELINES



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Pathfinder's social media channels are sharing our mission to generate individual wealth and collective wellbeing. We believe that money can grow wealth while respecting people, animals, and the planet. Our channels are a space for considerate dialogue around ethical investing and financial well-being. We welcome diverse perspectives and engagement.

This document applies to comments and community interactions on all public Pathfinder platforms, including but not limited to Instagram, Facebook, LinkedIn, and any future channels.

We reserve the right to hide or remove comments at our discretion if they breach this document. We also reserve the right to update or change this document as circumstances evolve. Any updates will be reflected in the version made publicly available on our website.

Our Principles

- **Transparency:** We allow feedback and criticism, even if it challenges us.
- **Safety:** We're not into swearing or meanness (we will hide posts that show no humour, consideration or tact).
- **Integrity:** We remove content that could mislead, confuse or appear as if Pathfinder endorses it without agreement.
- **Discretion:** Moderation and response decisions are made on a case-by-case basis, always in line with these principles.

How we manage engagement

1. Abusive communications

Definition: Bullying, harassment, or discriminatory remarks of any kind.

Examples:

- Comments targeting someone's ethnicity, identity, gender, sexuality, or religion in a way that bears no relation to the topic being discussed.
- Direct personal attacks against customers, staff, or community members.

Action: These comments will be hidden or deleted immediately. Pathfinder may escalate and file a harmful communications complaint if required.

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2. Advertising, junk or spam posts

Definition: Unsolicited promotions, spam links, or irrelevant content that may cause harm or falsely suggest Pathfinder's endorsement.

Examples:

- Links to unrelated products or services.
- Comments from fake or spam accounts.

Action: These will be hidden or removed immediately.

3. Critical or negative comments

Definition: Comments that express concern, skepticism, or critique but do so respectfully.

Examples:

- Short remarks raising doubt or concern.
- Longer comments questioning Pathfinder's approach, strategy, or performance.

Action: These comments will remain visible if they do not breach our safety and integrity principles. Pathfinder will aim to respond wherever possible to provide clarity around our position. We may consider asking people to message us for longer, specific or more complicated questions/comments.

4. Inflammatory or combative comments

Definition: Comments that appear designed to provoke, inflame, or derail meaningful conversation.

Examples:

- Repeated, off-topic complaints.
- Aggressive language that discourages constructive engagement.

Action: We will always attempt to respond with humour and an even temperament. If this doesn't yield a constructive response we would generally only hide these posts if they strayed into issues of safety or integrity (as above).

5. Direct Messages (DM's)

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Definition: Private messages sent to Pathfinder via platforms such as Instagram, Facebook, LinkedIn, or any future channels.

How We Handle DMs:

- **General inquiries:** We will aim to respond where appropriate and within a reasonable timeframe. We are likely to direct general queries over to our Customer Service team.
- **Spam or harmful content:** Any DMs containing unsolicited promotions, offensive content, or abuse will not receive a response and may be reported or blocked.
- **Escalation:** If a DM raises a serious concern (for example, a complaint or a potential harmful communications issue), it will be referred to the wider Pathfinder team for review.
- **Complaints** will be handled in accordance with our complaints document and will be directed to our compliance team

Note: Pathfinder reserves the right not to respond to every DM. Our discretion ensures that responses are meaningful and aligned with our principles.

6. Bots

Definition: Comments or interactions generated by automated systems rather than genuine individuals. These may include accounts created to amplify engagement, spread misinformation, or disrupt discussion through repetitive or low-quality content.

How We Identify Potential Bot Behaviour:

Indicators may include one or more of the following:

- Repeated posting of identical or near-identical comments across multiple posts or platforms
- Comments posted at unnatural frequency or speed
- Accounts with no profile details, anonymous usernames, or no meaningful posting history
- Engagement patterns inconsistent with normal user behaviour, such as mass tagging, excessive emojis, or irrelevant links
- Content designed to provoke or manipulate rather than participate in meaningful discussion

These signals are assessed in context and do not automatically confirm an account is a bot. Pathfinder will evaluate on a case-by-case basis.


Action: Comments identified as likely generated by bots will be hidden or removed. Pathfinder may block accounts or report them to the platform if they appear harmful, misleading or in breach of this document.

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Example 1 – Harmful Comment	Action & Reason
	<p>Comment: Two users wrote “deport” in response to a customer sharing that he is Samoan and the son of immigrants.</p> <p>Action Taken: Comment was hidden.</p> <p>Reason: This is discriminatory. Leaving it visible breaches our safety principle.</p> <p>Suggestion:/Opportunity: There's an opportunity here to show transparency. For example:</p> <p><i>"We've hidden some comments below that were not in line with our social media engagement document. These comments weren't relevant to the topic of Climate Change & aren't something we want to trail our advertising around Facebook. As an aside, we had to get this ad manually approved because of Meta's document around advertising that includes social issues, elections or politics. Maybe someone could comment on how hard it is to talk about Climate Change on Facebook...?"</i></p>

Example 2 – Critical Comments

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Comment:

1. “If I find out my fund is being run by a company that’s investing in carbon reduction, I’m changing my provider.”
2. “Can we please stop this hoax being taken seriously, there’s been NO debate or discussion!!”
3. “Imagine people are this stupid.”

Reason:

These comments are dismissive, skeptical, and contain harsh language, but they do not directly target or harass an individual. They fall under critical or negative comments, which our document allows to remain

Action Taken:

All three comments were left visible, and no response was made. However, they represent an opportunity for a thoughtful, brand-aligned engagement approach. Suggested responses are outlined below.

Suggested responses:

1. Investing in line with your values is what Pathfinder’s all about. Follow your dreams.
2. Check out page 27 in our 2024 Sustainability Report – we do a deep dive on where global warming started, the science behind it, the debate around it and what Pathfinder is doing because of it:
https://pathfinder.kiwi/documents/411/Sustainability_Report_2024.pdf
3. No response is needed.

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Key terms

Abusive Communications

Any comment that uses bullying, harassment, or discriminatory remarks of any kind. This includes targeting someone's ethnicity, identity, gender, sexuality, or religion in a way that bears no relation to the topic being discussed.

Advertising, Spam, or Junk Posts

Unsolicited promotions, links, or irrelevant content that may mislead the community or create the impression Pathfinder endorses products, services, or views without agreement.

Critical or Negative Comments

Feedback that expresses skepticism, doubt, or disagreement with Pathfinder's approach, strategy, or performance, but is done without personal attacks.

Inflammatory or Combative Comments

Remarks that are designed to provoke or derail meaningful discussion. This may include repeated off-topic complaints, aggressive language, or hostile tone that discourages constructive engagement.

Moderation

The process of reviewing, hiding, or removing comments that breach this document, and deciding when to respond or not respond.

Engagement

How Pathfinder interacts with its community online, including when we reply, when we provide clarity, and when we choose not to engage.