

Social Media Policy

COMPANY fully respects the legal rights of our employees and what you do on your own time is your business. However, COMPANY expects employees to exercise personal responsibility whenever they participate in social media. These guidelines will define our expectations further and will help guide employees' online activity.

Social Media Guidelines:

1. **Do not share private information.** You must not share confidential or proprietary information about COMPANY and you must maintain client privacy.

Your blog or online social network is not the place to conduct confidential business with a client, partner or supplier. Clients, partners or suppliers should not be cited or obviously referenced without their approval. Externally, **never identify a client, partner or supplier by name without permission and never discuss confidential details of a client engagement.** Internal social networking platforms permit suppliers and business partners to participate so be sensitive to who will see your content. If a client hasn't given explicit permission for their name to be used, think carefully about the content you're going to publish on any internal social media and get the appropriate permission where necessary. Do not publish anything that might allow inferences to be drawn, which could embarrass or damage a client.

Never discuss or otherwise disclose COMPANY's business performance or other sensitive or proprietary information. Some topics relating to COMPANY are sensitive and should never be discussed, even if you're expressing your own opinion and using a disclaimer. For example, you must not comment on, or speculate about, COMPANY's future business performance (including upcoming quarters or future periods), COMPANY's business plans, unannounced strategies or prospects (including information about alliances), potential acquisitions or divestitures, similar matters involving COMPANY's competitors, legal or regulatory matters affecting COMPANY and other similar subjects that could negatively affect COMPANY. This applies to anyone including conversations with financial analysts, the press or other third parties (including friends). Any other confidential, proprietary, or trade secret information not specifically listed here is obviously off-limits for your social media blogs/postings per the Confidentiality Agreement you have signed with COMPANY. Anything related to COMPANY policy, inventions, strategy, financials, etc. that has not been made public cannot appear in any of your social media sites blogs/posts under any circumstances. Disclosing confidential or proprietary information can negatively impact our business and may result in regulatory violations for the company.

2. **Engaging in Internet conversations as an employee, use of external websites for work-related purposes and using COMPANY logos or trademarks must be approved.** This could include, but is not limited to, participating on behalf of COMPANY on any online property (from social networks to commenting on news sites) or sharing photos of colleagues on any of the numerous social networks available.



If you communicate about COMPANY or COMPANY-related matters, disclose your connection with COMPANY and your role at COMPANY. Use good judgment and strive for accuracy in your communications; errors and omissions reflect poorly on COMPANY, and may result in liability for you or COMPANY. We believe in transparency and honesty; anonymity is not an option. When discussing topics relevant to COMPANY, you must use your real name, be clear who you are, and identify that you work for COMPANY. If you have a vested interest in something you are discussing, be the first to point it out.

COMPANY policy is to not comment on rumors in any way. You should merely say, "no comment" when asked to respond to rumors. Do not deny or affirm them (or suggest the same in subtle ways), speculate about them or propagate them by participating in "what if"-type conversations. If a member of the media contacts you about a COMPANY-related blog/posting or requests COMPANY information of any kind, contact COMPANY PR CONTACT. You should also reach out to Marketing for clarification on whether specific information has been publicly disclosed before you blog/post about it.

3. **Personal vs. Professional Social Media Activity**

Be thoughtful about how you present yourself in online social networks. By virtue of identifying yourself as a COMPANY employee within a social network, you are now connected to your colleagues, managers and even COMPANY's clients. You should ensure that content associated with you is consistent with your work at COMPANY. COMPANY employees are personally responsible for the content they publish online, whether in a blog, social media site or any other form of user-generated media. Be mindful that what you publish will be public for a long time—protect your privacy and take care to understand a site's terms of service.

If your blog, posting or other online activities are inconsistent with, or would negatively impact COMPANY's reputation or brand, you should not refer to COMPANY, or identify your connection to COMPANY. Use a personal email address (not your COMPANY address) as your primary means of identification for those sites that are not business related. Just as you would not use COMPANY stationery for a letter to the editor with your personal views, do not use your COMPANY e-mail address for personal views.

4. **Understand that you are legally responsible for your commentary.** Individuals can be held personally liable for any commentary deemed to be defamatory, obscene (not swear words, but rather the legal definition of "obscene"), proprietary, or libelous (whether pertaining to COMPANY, individuals, or any other company for that matter). For these reasons, employees should exercise caution with regards to exaggeration, colorful language, guesswork, obscenity, copyrighted materials, legal conclusions, and derogatory remarks or characterizations. In essence, you blog (or post on social media sites) at your own risk. Outside parties actually *can* pursue legal action against you (not COMPANY) for postings.



5. **Write in the first person and use a disclaimer.** Make it clear that you are speaking for yourself and not on behalf of COMPANY. Include this disclaimer to the “About me” section of your blog or social networking profile: “The views expressed on this [blog; website] are my own and do not reflect the views of my employer.” If a site does not afford you enough space to include this full disclaimer, you should use your best judgment to position your comments appropriately.

A disclaimer does not exempt COMPANY managers and executives from a special responsibility when participating in online environments. By virtue of their position, they must consider whether personal thoughts they publish may be misunderstood as expressing COMPANY positions. And a manager should assume that his or her team will read what is written. Public forums are not the place to communicate COMPANY policies to COMPANY employees.

6. **If you have questions about what is appropriate – ask.** If you wouldn’t want your manager, clients or others at COMPANY to see your post, it is likely unwise to share it on the Internet, but please ask if you are unsure about something *before* you post it.

Any questions should be directed to COMPANY’s Marketing Department and Social Media Teams or referred to our social media consultant, [Digital Media Ghost](#) (hint, hint).

