

Social Media Policy

We understand that social media can be a fun and rewarding way for employees to share their lives and opinions with family, friends, and coworkers. However, the use of social media also presents certain risks and carries with it certain responsibilities. To assist employees with making responsible decisions about the use of social media, the company has established this policy. This policy applies to all forms of online publishing, messaging, and discussion- including blogs, wikis, file sharing, user generated video and audio, virtual worlds, and social networks such as Facebook and LinkedIn.

The company fully respects the legal rights of employees, and in general, what employees do on their own time is their business. However, activities inside or outside of work that affect an employee's job performance, the performance of others, or the company's business interests are a proper focus for this policy.

Employees are personally responsible for what they publish online. What employees post will be truly public for an indefinite period of time. Therefore, employees should guard their privacy and that of family and friends, and think carefully before sending something into cyberspace that will be impossible to erase. The best rule of thumb is that employees should use common sense. If an employee is about to post or publish something that makes him or her the slightest bit uncomfortable, he or she should reconsider.

When the company wishes to communicate publicly as a company - whether to the marketplace or to the general public - it has well-established means to do so.

Only those officially designated by the company have the authorization to speak on behalf of the company in any medium.

In light of the information set forth above, the following rules apply to all employees:

- Unless an employee is acting on behalf of the company and at its discretion, an employee may not use social media during working time.
- Employees shall not post their job title or function in online social profiles.
- An employee may not register account names that incorporate any of the company's business names, trademarks, or names that imply an association with the company.
- If an employee chooses to discuss the company or work related matters, it must be made clear that he or she is not speaking on behalf of the company. If any employee does mention the company by name, statements relating to work could be attributed to the company. When communications relate to work or the industry, employees should post a disclaimer such as this:
 - *"The postings on this site are my own and don't necessarily represent my employer's views."*
- If an employee's mode of communication does not allow for lengthy messages, at least write *"personal view"* when expressing an opinion.
- Employees shall not distribute the company's, or anyone's, confidential, private, or proprietary information.
- Employees shall not create a link from their blog, website, or other social networking site to the company's site.
- If an employee happens to be in a management or executive position, using the standard disclaimer will not be enough when participating in social media. Personal thoughts may be interpreted by the public as expressing the official company's policy simply because of such employee's position within the company. If an employee is part of management, assume that readers will attribute expressed views to the company, and

take special care.

- Employees should be respectful and avoid vulgar language, strident opinions, and inflammatory rhetoric.

The company acknowledges that employees have the right to engage in protected concerted activities under labor and employment laws and may choose to do so through social media. This policy is **not** intended to limit such rights.

Dionne Chouest Austin

General Counsel

May 14, 2015

No references

Exported by: HR Group/ECO @2019-10-31T15:02:33.367-05:00