

Social Media Policy

Purpose of the Social Media Policy

The Company recognizes that its employees have an interest in using social media during their non-working time without unnecessary employer interference. We respect your right to participate in social media during your non-working time for personal reasons. However, the use of social media carries with it certain risks and responsibilities, some of which can have an impact on the workplace.

This Social Media Policy has been established to assist you in making responsible decisions about your use of social media and to ensure that you understand the types of conduct that are prohibited. This policy will not be interpreted or applied as to interfere with the rights of non-management employees to discuss or share information related to their wages, hours, or other terms and conditions of employment. Employees have the right to engage in or refrain from such activities.

What We Mean by Social Media

Social media includes all forms of communicating or posting content on the Internet, including personal web pages, message boards, networks, communities, blogs, and social networking websites such as Facebook, Twitter, LinkedIn, Tumblr, and Instagram.

Use of Company Computer Systems

The Company's computer systems are provided for business purposes. You should not use the Company's computer systems for personal use during working time. Remember, any content accessed, created or exchanged using the Company's systems is not private and is subject to monitoring.

Company-Sponsored Social Media

The Company engages in communications with current and prospective employees, customers, suppliers and the general public via Company-sponsored social media. Company-sponsored social media are for business use only and the Company owns the accounts and all the content on such accounts. Only employees who are authorized by the Company can prepare content for or delete, edit or otherwise modify content on Company-sponsored social media. Additionally, only employees who are authorized by the Company can advertise Company products and services (whether on Company-sponsored social media or elsewhere).

Using Social Media Responsibly

1. Protect Confidential Information. When engaging in social media, you are responsible for protecting Company trade secrets, and proprietary and confidential information. Using or disclosing Company trade secrets, and proprietary and confidential information is prohibited. Some examples of confidential or proprietary information within the meaning of this policy include non-public information regarding business strategies, costs, contract terms and similar information which could be used by competitors to the Company's disadvantage; confidential or personal information regarding third parties doing business with the Company that could, if disclosed without authorization, subject the Company or you to liability; and, private information about the Company's employees and third parties doing business with the

Company that could, if disclosed without authorization, violate data protection and privacy laws or result in legal action against the Company or you. Confidential information for purposes of this policy does not include information regarding employee wages, hours, and working conditions.

- 2. Comply with Company Policies.** You are responsible for ensuring that your activities do not violate Company policies, including in particular policies prohibiting harassment, discrimination and retaliation. For example, employees are prohibited from using social media to post or display comments about Company employees, customers, vendors, suppliers or other third parties that are vulgar, obscene, physically threatening or intimidating, harassing, or otherwise constitute a violation of the Company's policies against discrimination or harassment on account of an individual's race, national origin, religion, age, sex, sexual orientation, disability, or other protected characteristic.
- 3. Comply with Applicable Laws.** You are responsible for abiding by all applicable laws when using social media, including without limitation intellectual property, data protection, privacy, and libel/slander laws.
- 4. Make Clear You Are Not Speaking for the Company.** When posting your personal point of view, you are responsible for avoiding any statement or implication that the views you express are those of the Company. You may not at any time make statements about the Company's services that cannot be substantiated.
- 5. Comply with the Federal Trade Commission's ("FTC") Guidelines Concerning Endorsements.** If the Company requests you to blog, chat or otherwise advertise or provide an endorsement of the Company's services as part of your job duties, you are responsible for complying with the FTC's guidelines concerning endorsements. This includes adequately disclosing your relationship with the Company. Simply listing the Company as your employer on your profile is not adequate disclosure. The following is an example of an appropriate disclosure: *I am the Special Events Manager for Z Hotel, the hotel that is sponsoring this event. I am disclosing this employment relationship in accordance with the Federal Trade Commission's "Guides Concerning the Use of Endorsements and Testimonials in Advertising."*

Employees who violate this Social Media Policy are subject to discipline, including up to termination. Employees who use social media for illegal purposes are subject to appropriate legal action.