

## **Organization Social Media Guidelines:**

Every day, people discuss, debate and embrace Organization and our brands in thousands of online conversations. We recognize the vital importance of participating in these online conversations and are committed to ensuring that we participate in online social media the right way. These Social Media Principles have been developed to help empower our partners to participate in this new frontier of marketing and communications, represent Organization, and share the optimistic and positive spirit of Organization while protecting Organization reputation and proprietary information.

These guidelines apply to all Organization partners, employees, and contractors who participate in any form of social networking, both on and off organization.com and both officially and unofficially, including [Facebook, Twitter, Snapchat, YouTube] Organization blogs, personal blogs, message boards, wikis, video networks, or virtual worlds. We expect all who participate in social media on behalf of Organization to be trained, to understand and to follow these guidelines. Failure to do so could put your future participation at risk. These guidelines will continually evolve as new technologies and social networking tools emerge—so check back once in awhile to make sure you're up to date.

If you have questions regarding your participation in social media, please consult the Mission Statement [\[Insert Link\]](#), Business and Ethical Conduct Guidelines [\[Insert Link\]](#), Employee Handbook [\[Insert Link\]](#), Document Retention Policy [\[Insert Link\]](#), and the Media/Investor Inquiries Policy and Procedures [\[Insert Link\]](#).

### **Overall Principles**

While Organization encourages all of its partners to explore and engage in social media at a level at which they feel comfortable, it is critical that all of our partners approach online communities in the same way we expect you to approach physical communities – by using sound judgment and common sense, by adhering to Organization core values, and by following the Business and Ethical Conduct Guidelines and all other applicable policies. It is critical that we always remember who we are. The same rules that apply to our messaging and communications in traditional media still apply in the social media space. Our customers need to be confident that the activities of our partners do not undermine Organization reputation and branding.

Partners are responsible for acting in a manner that is consistent with the Organization Mission. To that end, partners are expected to be courteous, respectful, and thoughtful about how Organization and other partners may be affected by a partner's participation on a social media platform. Incomplete, inaccurate, inappropriate, threatening, harassing or poorly worded postings may be harmful to customers or other partners, damage professional relationships, undermine Organization' effort to encourage teamwork, violate Organization policies or harm Organization, which may result in disciplinary action up to and including termination.

## Partner's Personal Participation in Social Media

Organization understands that partners may maintain or contribute to personal blogs, message boards, conversation pages and other forms of social media (such as Facebook and Twitter) outside of their job and may periodically post information about their job or Organization' activities on these outlets. If a partner posts Organization or job-related information, he or she is required to exercise good judgment, abide by Organization policies, and take the following into consideration.

**1. Adhere to the Business and Ethical Conduct Guidelines and other applicable policies.** All Organization partners, from the executive team to every intern, are subject to the Organization Business and Ethical Conduct Guidelines in every public setting. In addition, other policies, including the Information Protection Policy and the Insider Trading Policy, govern partners' behavior with respect to the disclosure of information; these policies are applicable to your personal activities online.

**2. Be clear that you are speaking for yourself.** When posting your point of view, you should neither claim nor imply you are speaking on Organization' behalf, unless you are authorized in writing by your manager to do so. Organization may request that you avoid certain subjects or withdraw certain posts from a blog if it believes that doing so will help ensure compliance with applicable laws, including securities regulations.

**3. You are responsible for your actions.** Each partner bears full responsibility for the material he or she posts on personal blogs or other social media. When you participate in social media, we urge you to do so properly, exercising sound judgment and common sense. You should be aware that because you are legally responsible for your postings, you may be subject to liability if your posts are found defamatory, harassing, or in violation of any other applicable law. You may also be liable if you make postings which include confidential or copyrighted information (music, videos, text, etc.) belonging to third parties.

**4. No use of Organization intellectual property.** Your Internet postings should not include Organization logos or trademarks, and should respect copyright, privacy, fair use, financial disclosure, and other applicable laws. In addition, Organization partners should not circulate postings they know are written by other Organization partners without informing the recipient that the author of the posting is a Organization partner.

**5. No Organization Screen Names.** When partners establish an account on a social media platform personally, partners should not use Organization or any of its brands name in the partner's identity (e.g. username, "handle" or screen name), nor should a partner speak as a representative of Organization. If a media inquiry is generated, please direct it to the \_\_\_\_\_ Department.

**6. Legal disclaimer.** If you identify yourself as a Organization partners on any Internet posting or refer to the work done by Organization, you are required to include the following disclaimer in a reasonably prominent place: "the views expressed on this post are mine and do not necessarily reflect the views of Organization."

**7. Be conscious when mixing your business and personal lives.** Online, your personal and business personas are likely to intersect. Organization respects the free speech rights of all of its partners, but you must remember that customers, colleagues and supervisors often have access to the online content you post. Keep this in mind when publishing information online that can be seen by more than friends and family, and know that information originally intended just for friends and family can be forwarded on. Remember NEVER to disclose non-public information of Organization (including confidential information), and be aware that taking public positions online that are counter to Organization' interests might cause conflict.

**8. Be transparent.** Be transparent and honest in your social media participation. If you have a vested interest in something you are discussing, be the first to point it out. But also be smart about protecting yourself and your privacy. What you publish will be around for a long time, so consider the content carefully and also be judicious in disclosing personal details.

**9. Be thoughtful about how you present yourself in online social networks.** In online social networks, the lines between public and private, personal and professional are blurred. Just by identifying yourself as an Organization employee, you are creating perceptions about your expertise and about Organization by our shareholders, customers, and the general public—and perceptions about you by your colleagues and managers. Do us all proud. Be sure that all content associated with you is consistent with your work and with Organization's values and professional standards.

**10. Managers and executives take special note.** If you are a manager or executive of Organization [**This may be specific to titles unique to Organization**], your posts published on a social media platform may, by virtue of your position, be misunderstood as expressing Organization positions. Accordingly, you should use special care to demonstrate discretion, thoughtfulness, and respect and ensure that your posts represent Organization as you would in any other public forum or medium. And a manager should assume that his or her team will read what is written. A public post is not the place to communicate Organization policies to Organization partners.

**11. Be responsible to your work.** Organization understands that partners may engage in social media activities at work for legitimate purposes and that these activities may be helpful to Organization. However, Organization reminds all partners to exercise sound judgment and common sense to prevent social media sites from becoming a distraction at work or otherwise interfere with partners' getting their work done.

**12. Be a "scout" for compliments and criticism.** Even if you are not an official online spokesperson for Organization, you are one of our most vital assets for monitoring the social media landscape. If you come across positive or negative remarks about Organization that you believe are important, consider sharing them by forwarding them to **[Link]**.

**13. Let the experts respond to negative posts.** You may come across negative or disparaging posts about Organization, or see third parties trying to start negative conversations. Unless you are an official online spokesperson, avoid the temptation to react yourself. Pass the post(s) along to our official in-market spokespersons who are trained to address such comments, at **[Link]**.

## Participation in Official Organization Social Media Accounts

Just as with traditional media, we have an opportunity – and a responsibility – to effectively manage Organization’ online reputation and to selectively engage and participate in the thousands of conversations that mention us every day. The following principles guide how our Official spokespersons should represent Organization when they are speaking on behalf of Organization.

- 1. Approvals.** All official Organization blogs, Facebook pages, Twitter accounts, etc. must be (1) approved by \_\_\_\_\_; (2) published using the approved Organization blogging platform and tools; and (3) administered by the \_\_\_\_\_ Team. Each article or comment to be posted will be reviewed and approved by a member of the \_\_\_\_\_ Team prior to posting. **[This should be customized depending on how detailed the approval process will be.]**
- 2. Be Trained.** All partners who wish to officially represent Organization online must receive their manager’s authorization and complete the social media training program prior to beginning or continuing these activities.
- 3. Know and follow Organization’ Conduct guidelines [Insert Link].** If you have any confusion about whether you ought to publish something online, chances are the Business and Ethical Conduct Guidelines will resolve it. Pay particular attention to what the Business and Ethical Conduct Guidelines have to say about proprietary information, about avoiding misrepresentation and about competing in the field. If, after checking the Business and Ethical Conduct Guidelines, you are still unclear as to the propriety of a post, it is best to refrain and seek the advice of management. In addition, several other policies govern your behavior as a Organization spokesperson in the social media space, including the \_\_\_\_\_ Policy and the \_\_\_\_\_ Policy.
- 4. Be mindful that you are representing Organization.** As a Organization representative, it is important that your posts convey the same positive, optimistic spirit that Organization instills in all of its communications. Be respectful of all individuals, races, religions and cultures; how you conduct yourself in the social media space not only reflects on you – it is a direct reflection on Organization.
- 5. Organization document.** Remember that each published post or response will become a Organization document that is subject to discovery in a lawsuit or a government investigation. As a result, don’t put anything in a published post or response you wouldn’t put in an internal memo.**[Link to Legal Hold Policy]** It is also critical that we keep records of our interactions in the social media space. Because online conversations are often fleeting and immediate, it is important for you to keep track of them when you’re officially representing Organization.
- 6. Be transparent.** Your honesty—or dishonesty—will be quickly noticed in the social media environment. If you are blogging about your work at Organization, use your real name, identify that you work for Organization, and be clear about your role. It is never acceptable to use aliases or otherwise deceive people. This disclosure is equally important for any agency/vendor/partner/third party who is representing Organization online. They must disclose that they work “with Organization.” If you have a vested interest in something you are discussing, be the first to point it out. Nothing about transparency changes your obligation to keep proprietary information and content confidential.
- 7. Add value.** Organization’ brand is best represented by its people and everything you publish reflects upon it. Official Organization blogs and social network accounts should be used in a way that adds value to Organization’ business. If it helps you, your coworkers, our clients or our partners to do their jobs and solve problems; if it helps to improve knowledge or skills; if it contributes directly or indirectly to the improvement of Organization’ products, processes and policies; if it builds a sense of community; or if it helps to promote the Organization’ Mission, then it is adding value.

**8. Protect Organization' proprietary and confidential business performance and business plans.** You should limit your comment on confidential Organization financial information, product launches, expansion plans, etc. that are not generally known. This includes statements about an upcoming quarter or future periods or information about alliances. Official spokespersons should not comment on rumors in any way. You should merely say, "no comment" to rumors. Do not deny or affirm them—or suggest either denial or affirmation in subtle ways.

**9. Protect Organization' customers, business partners and suppliers.** Customers, partners or suppliers should not be cited or obviously referenced without their approval. You should also use great care in discussing confidential details of a business partnership or engagement of a vendor. If a client hasn't given explicit permission for their name to be used, think carefully about the content you're going to publish and get the appropriate permission where necessary. It is acceptable to discuss general details about kinds of projects and to use non-identifying pseudonyms for a client (e.g., Client 123) so long as the information provided does not make it easy for someone to identify the client or violate any non-disclosure or intellectual property agreements that may be in place with the client.

**10. Respect copyright and trademark laws when posting third party content.** For Organization' protection and well as your own, it is critical that you show proper respect for the laws governing trademark, copyright and fair use of copyrighted material owned by others. Do not claim authorship of something that is not yours. If you are using another party's content, make certain that they are credited for it in your post and that they approve of you using their content. You should never quote more than short excerpts of someone else's work. It is good general practice in social media to link to and credit others' work.

**11. Substantiate any claims you make in a post.** If you make any product claims with respect to Organization' performance or the performance of any of Organization' competitors or partners, You should make sure that you can substantiate the claim with a legitimate source.

**12. Use a disclaimer.** All Organization blogs and posts must include a legal disclaimer stating that all posts by the author, guest author and visitors reflect personal thoughts and opinions which are not necessarily those of Organization. The legal department will help you establish an appropriate disclaimer.

**13. Remember that your local posts can have global significance.** Remember that Organization is a global Organization. The way that you answer an online question might be accurate in some parts of the world, but inaccurate (or even illegal) in others. Keep that "world view" in mind when you are participating in online conversations.

**14. Know that the Internet is permanent.** Once information is published online, it is essentially part of a permanent record, even if you "remove/delete" it later or attempt to make it anonymous. If your complete thought, along with its context, cannot be squeezed into a character-restricted space (such as Twitter), provide a link to an online space where the message can be expressed completely and accurately.

**15. When in doubt, do not post.** If you're about to publish something that makes you even the slightest bit uncomfortable, don't shrug it off and hit 'send.' Take a minute to review these guidelines and try to figure out what's bothering you, then fix it. If you're still unsure, you might want to discuss it with your manager or legal representative. Ultimately, what you publish is yours—as is the responsibility. So be sure.

## Style and Content

- 1. Be Interesting.** Writing is hard work. The best way to be interesting, avoid any trouble, and have fun is to write about what you know. If you want to develop a post in an area that you are not familiar with, consult a subject matter expert to assist you with drafting the post. You don't have to be a great or even a good writer to write a good post, but you do have to make an effort to be clear, complete, and concise. There are very few first drafts that can't be shortened, and usually improved in the process.
- 2. Create some excitement.** As a business and as a corporate citizen, Organization is making important contributions to the world and to public dialogue on a broad range of issues. Let's share with the world the exciting things we're learning and doing—and open up the channels to learn from others.
- 3. Be a leader.** There can be a fine line between healthy debate and incendiary reaction. Do not denigrate our competitors or Organization. Nor do you need to respond to every criticism or barb. Try to frame what you write to invite differing points of view without inflaming others. Some topics—like politics or religion—slide more easily into sensitive territory. So be careful and considerate. Once the words are out there, you can't really get them back. And once an inflammatory discussion gets going, it's hard to stop.
- 4. It's a conversation.** Talk to your readers like you would talk to real people in professional situations. In other words, avoid overly pedantic or "composed" language. Don't be afraid to bring in your own personality and say what's on your mind. Consider content that's open-ended and invites response. Encourage comments. You can also broaden the conversation by citing others who are blogging about the same topic and allowing your content to be shared or syndicated.
- 5. Respect your audience and your coworkers.** Remember that Organization is an organization whose employees and clients reflect a diverse set of customs, values and points of view. Don't be afraid to be yourself, but do so respectfully. This includes not only the obvious (no ethnic slurs, personal insults, obscenity, etc.) but also proper consideration of privacy and of topics that may be considered objectionable or inflammatory. For example, ask permission before posting someone's picture in a blog or discussing a conversation that was meant to be private.
- 6. Don't pick fights.** If you use the blog to correct misrepresentations made about Organization by media, analysts or by other bloggers, always do so with respect and stick to the facts. Also, if you speak about a competitor, you must make sure that what you say is factual and that it does not disparage the competitor. If you publish inflammatory commentary, it will undoubtedly be shared with competitors or other bloggers.
- 7. Be the first to respond to your own mistakes.** If you make an error, be up front about your mistake and correct it quickly. In a blog, if you choose to modify an earlier post, make it clear that you have done so.
- 8. Quality Matters.** Use a spell-checker. If you're not design-oriented, ask someone who is whether your blog looks decent, and take their advice on how to improve it.

## **Guidelines for Moderators of Official Organization Blogs**

The policies below are designed to assist moderators of blog entries and social media posts to Organization' official social media accounts. As a blog and social media post moderator, no post or comment will be published until you approve it. In general, if a post is consistent with the purpose of the blog and a comment is related to a post, and otherwise complies with Organization policies you should approve the blog entry or comment.

While we permit user participation, there are some guidelines we ask you to follow to help keep it safe for everyone. In addition, Organization has put in place automated controls to combat spam and malicious content. Organization does not endorse or take responsibility for content posted by third parties, referred to as user generated content. This includes text input and uploaded files (video, images, audio, executables, documents).

- 1. Know and understand Organization's Business and Ethical Conduct Guidelines, Organization's Online Public Communications Policy, and Organization's Media/Investor Inquiries Policy and Procedures.** Official social media spokespersons will look to you for assistance in interpreting these policies so it is critical that you understand what they say and the rationales underlying the policies. If you have any questions, please contact the legal department.
- 2. Attend training.** All moderators should be trained regarding these social media policies, including their responsibilities to review content submitted for posting to ensure compliance with these policies.
- 3. Be consistent.** Be consistent with your review and your application of the standards for approving or rejecting a post or comment. The best way to avoid controversy and accusations of favoritism is to be consistent.
- 4. Balance the online dialogue.** Try to keep a balanced dialogue. If the content is positive or negative and in context to the conversation, then we approve the content, regardless of whether it's favorable or unfavorable to Organization. But if the content is ugly, offensive, denigrating or completely out of context, you should reject the content.
- 5. Ensure that all commenters are identified.** Before approving any comment or post, confirm that the commenter has registered and clearly identifies himself or herself.
- 6. Links to third party content.** The linked content of any embedded hyperlinks within any posts or comments submitted for posting should be evaluated prior to posting. Any posted hyperlinks should be accompanied by a disclaimer stating that Organization does not guarantee the authenticity, accuracy, appropriateness or security of the linked web site or content. If you have any questions, please consult the legal department.
- 7. Evaluate the content of the blog posting or comment.** Review the content of the blog posting or comment to ensure that the post or comment will not violate any copyright or trademark laws, does not disclose any proprietary or confidential Organization information that is inappropriate for the blog, and does not violate any of Organization's policies. If you have any questions as to whether content is permissible, please consult the legal department.
- 8. Don't edit the blog posting or comment.** If a post or comment is incorrect or contains misspellings or other style mistakes, do not correct or edit the posting or comment. Return it to the author and ask the author to correct the posting or comment and resubmit it.

**9. Organization document.** Remember that each post or comment will become a Organization document that is subject to discovery in a lawsuit or a government investigation. As a result, don't approve any post or comment that Organization wouldn't put in an internal memo or e-mail.

**10. Use your best judgment.** Remember that there are always consequences to what is published. If a post makes you uncomfortable, particularly if you have concerns about whether the post unnecessarily discloses sensitive information or could have an impact on a partner or supplier, don't approve the blog post or comment.

**Last updated:** \_\_\_\_\_ 2015