

The Complete Compliance and Ethics Manual 2023

Model Social Media Policy

Function	Effective Date	Pages	Revision Date
Global Compliance	[Effective Date]	5	[Revision Date]

Scope

This policy applies to [COMPANY NAME] and its subsidiaries (collectively, “[COMPANY NAME]” or the “Company”) and the directors, officers, and employees of such entities as well as those acting for or on behalf of such entities (collectively, “Covered Persons”).

Purpose

This policy provides guidance on the proper and acceptable use of social media through both external platforms (External Social Media), including YouTube, LinkedIn, Facebook, Twitter, Instagram, Pinterest, Snapchat, TikTok, or any other existing or future social media platform, as well as internal social media tools like Slack, Microsoft Teams, Yammer, and other future social media tools used by the company internally (Enterprise Social Media).

Policy

The Company recognizes the internet provides an opportunity to participate in interactive discussions and share information on particular topics using a wide variety of social media. This includes posting comments, pictures, videos, and blogs; using forums; sending private messages relating to the Company, its customers, or colleagues; endorsing other people’s content; and sharing/circulating posts.

Only those employees who have responsibility for media communications and use External Social Media as part of their job duties are authorized to speak on behalf of the Company on External Social Media. When such authorized employees speak on behalf of the Company, they do so in compliance with the Company’s Corporate Communications Policy.

Even when used outside of work, social media activities have the potential to adversely affect the Company and its legitimate business interests. As a result, such activities are a proper focus for Company attention. When participating in social media activities, there is a big difference between speaking on behalf of the Company (as an authorized Company representative); speaking about the Company, including talking about any of our employees, brands, products, customers, or business partners; and speaking on your own personal behalf about matters unrelated to the Company.

External Social Media Use

Those of us not authorized to speak on behalf of the Company should keep the following in mind when using External Social Media and communicating (directly or indirectly) about the Company, any of our employees, our brands, products, customers, or business partners:

- Be truthful and honest. Tell the truth, and if you find you have made a mistake, issue a prompt clarification or withdrawal (or whatever action may suit the circumstance).
- If you are in a discussion that relates to the Company, any of its employees, its brands or its products, its customers, or its business partners and you want to respond or make a comment about something specific, first verify the correct details through Company published information.
- Be respectful. Put the Company's values into practice. Be respectful of all individuals, races, religions, and cultures. The way you conduct yourself online (even if you do not speak on behalf of the Company) reflects on you and the Company.
- Do not use ethnic slurs; denigrate, harass, or insult others; or engage in any conduct that would not be acceptable under the Company's Code of Conduct.
- Please respond carefully and remember your online postings and conversations are not private (and may last for a very long time).
- Be mindful that different cultures have different values and standards of behavior. Statements considered acceptable or even funny in one culture may be offensive to others. Keep a global view in mind when you are participating in online communications.
- Remember that you are responsible for your actions. Realize that what you post may be shared by others or even go viral, spreading rapidly and widely. You are personally responsible for the content you publish on social media. This means you should use common sense and use at least the same caution with social media as you do with all other forms of communication.
- Be yourself and be transparent. Sometimes it can be difficult to maintain separation between your personal and professional life on social media. When discussing topics relevant to the Company, any of its employees, its brands or products, its customers, or its business partners, you must use your real name, be clear who you are, and identify that you work for the Company. If you are not officially authorized to speak on behalf of the Company, you should make that clear. Add a disclaimer such as, "The postings on this site are my own and do not necessarily represent the Company's positions, strategies or opinions."
- You are not authorized to use any online name or other identification that incorporates the Company's name or any of its brand names (or any variants thereof).
- Protect proprietary information and relationships. Never reveal Company proprietary, nonpublic information through social media unless you are specifically authorized to do so by the Company. Proprietary, nonpublic information may include responsibilities and organizational charts, information regarding internal processes, sales data and plans, performance information, Company finances or financial results, strategies, product development information, product launch information, unannounced technology, or anything considered proprietary.
- Do not post information about a competitor, outside person, supplier, or other company unless you are authorized to do so, taking into account intellectual property rights and privacy concerns of others.

- Should you become aware of a violation of this policy or have a concern about the appropriateness of any External Social Media post, please contact the Company's Compliance Helpline: [INSERT LINK TO COMPLIANCE HELPLINE HERE].

Use of Internal Enterprise Social Media

Enterprise Social Media provides an internal environment for Company employees to innovate, connect, share, express personal views, and engage in open discussions about matters of legitimate business interest with colleagues. When using Enterprise Social Media:

- Make sure your content is productive, work-related, and professional, and use the same corporate etiquette required for communications with corporate email, telephone, and face-to-face conversations with other employees.
- Be thoughtful and respectful in constructing posts, especially when voicing criticism or contrary points of view, so that Enterprise Social Media remains a safe place for all to participate in, learn from, and enjoy.
- Remember all other Company policies, including, but not limited to, our policies on Human Rights and Use of Company Property, apply to the use of Enterprise Social Media.
- Use good judgment when considering how to use information or opinions found on Enterprise Social Media, and consult your manager for any clarification you require.
- Remember that while the Enterprise Social Media may contain plenty of useful information, the Company cannot guarantee the accuracy, privacy, or validity of information provided in the groups by other users.
- In any case, do not consider information contained in Enterprise Social Media as official communication from the Company.
- Respect each other's privacy. Do not share personal information about colleagues without their explicit consent. Personal information includes, but is not limited to, personal email addresses, home addresses, home or cell phone numbers, and photos or videos of colleagues.
- Information, opinions, statements, pictures, and/or files posted on Enterprise Social Media cannot be considered private. Be aware that content shared outside of private groups within Enterprise Social Media is accessible by *all* Enterprise Social Media users; it is very easy to accidentally post information to the entire Company rather than only to a specific group.
- Share confidential and proprietary information only with those who have a need to know such information and are authorized to access such information. Confidential and proprietary information includes, without limitation, sales data and plans, company finances and operating results, business strategies, product development activities, product launch information, and unannounced technology.
- Respect intellectual property rights. Intellectual property rights (e.g., copyrighted material, trademarks, patented information, and trade secrets) are in place to protect the ideas people have, create, or develop so that other people are prohibited from using the information unless explicitly authorized by the Company. When in doubt about the protected status of information, avoid using, sharing, or otherwise disclosing such information.
- Should you become aware of a violation of this policy or have a concern about the appropriateness of any Enterprise Social Media post, please contact the Company's Compliance Helpline, which can be found here:

[INSERT LINK TO COMPLIANCE HELPLINE].

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