

The Complete Compliance and Ethics Manual 2024

Appendix 5-S: 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].

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