

Personal Social Media and Online Communication Policy Employee Handbook Policy

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At IHLS, we understand that social media and other forms of online communication can be a fun and rewarding way to share your life and opinions with family, friends, and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities, particularly if you are representing yourself as an employee of IHLS (such as through listing your current employer and position). To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

In the rapidly expanding world of electronic communication, *social media* can mean many things. For the purpose of this policy, *social media* and online communication includes all means of publicly communicating or posting information or content of any sort on the Internet, including to your own or someone else's blog, personal website, social networking or affinity website, web bulletin board, or chat room, whether or not associated or affiliated with IHLS, as well as any other form of electronic communication and social media platforms (e.g., Facebook, YouTube, LinkedIn, Instagram, Twitter, etc.). Carefully read these guidelines and other IHLS policies such as its policies against discrimination and harassment to ensure that your postings are consistent with these and other policies of IHLS.

Content Guidelines

- All IHLS policies apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, keep in mind that if your conduct adversely affects your job performance or that of colleagues, members, customers, suppliers, people who work on behalf of IHLS, or IHLS's legitimate business interests, it may result in disciplinary action up to and including termination.
- Know and follow the rules. Carefully read these guidelines, the IHLS Diversity Policy, and the Discrimination & Harassment Prevention Policy, and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or any other inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.
- Be respectful. Always be fair and courteous to fellow associates, customers, members, vendors, and people who work on behalf of IHLS. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or by utilizing our Open Door Policy than by posting complaints to a social media or other online outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video, or audio that reasonably could be viewed as malicious, obscene, threatening, or intimidating; that disparage customers, members, associates or suppliers; or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts

that could contribute to a hostile work environment on the basis of actual or perceived race, sex, disability, religion, or any other status protected by law or IHLS policy.

• Be honest and accurate. Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about IHLS, fellow associates, members, customers, suppliers, people working on behalf of IHLS, or competitors.

• Post only appropriate and respectful content:

- Maintain the confidentiality of IHLS trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how, and technology. Do not post internal reports, policies, procedures, or other internal business-related confidential communications.
- Respect financial disclosure laws.
- Do not create a link from your blog, website, or other social networking site to an IHLS website without identifying yourself as an IHLS associate.
- Never represent yourself as a spokesperson for IHLS. If IHLS is a subject of the content you are creating, be clear and open about the fact that you are an associate and make it clear that your views do not represent those of IHLS, fellow associates, members, customers, suppliers, or people working on behalf of IHLS. If you publish a blog or post online related to the work you do or subjects associated with IHLS, make it clear that you are not speaking on behalf of IHLS. One way to do this is to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of IHLS."

Using social media at work

Refrain from using social media while on work time or on equipment IHLS provides unless it is work-related as authorized by your manager or consistent with the Use of Facilities and Equipment and Materials Policy. Do not use IHLS email addresses to register on social networks, blogs, or other online tools utilized for personal use.

Security

You should take care to maintain the security of your personal data on social media. You should refrain from posting personally identifying information, such as your home address, telephone numbers, birth dates, or credit/financial information on any social media sites. Personal data can be used by malicious actors to hack, infiltrate, disrupt, and otherwise threaten your safety and IHLS data. You must be vigilant against threats often launched through social media sites, including:

• "spear phishing," which is the practice of publishing a link or document on a site that, when clicked or opened, launches an attack;

• "social engineering," which relies on exploiting the human element of trust to collect information to be used against the target; and/or

• web applications, which are dynamic web pages that use scripting to provide additional functionality to a site and, when used maliciously, can compromise your account and download unauthorized software onto a computer.

Monitoring

IHLS may monitor the Internet and IHLS equipment for employee compliance with this policy and to enforce other IHLS policies.

Retaliation is prohibited

IHLS prohibits taking negative action against any associate for reporting a possible deviation from this policy or for cooperating in an investigation. Any associate who retaliates against another associate for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action up to and including immediate termination.

Media contacts

Associates should not speak to the media on IHLS's behalf without contacting the Marketing/Communications Team. All media inquiries should be directed to them.

For more information

If you have questions or need further guidance, please contact your IHLS human resources representative.