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SOCIAL MEDIA USE POLICY Issued: 11/20/2015			

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1.0 Purpose

Constellis, LLC and its affiliates (the “Company”) created this Social Media Use Policy (the “Policy”) to document its expectations related to the use of social media and the posting of information on social networking platforms and social media outlets.

2.0 Policy Summary

The Company prohibits any and all activity on social media that violates its Code of Business Ethics and Conduct (“the Code”) or any other Company policy or customer requirement. As stated below, this prohibition explicitly includes any statements that (1) are racist, anti-Semitic, sexist, homophobic, or pertain to any other protected category; (2) could be reasonably construed to incite violence or other unlawful activity; (3) disseminated confidential or proprietary information; or (4) otherwise contravene the Code. This prohibition does not prevent or otherwise restrict employees’ ability to use social media to exercise rights identified in federal or state labor law rights, including any and all rights to engage in protected concerted activity under the National Labor Relations Act, or any whistleblower protections under federal or state law.

3.0 Scope

This Policy applies to all Company employees, independent contractors, consultants, representatives, and any other persons acting on or behalf of the Company.

4.0 Policy

This Policy affects and/or applies to all applicants, employees, affiliated companies, and both affiliated and independent contractors (“Personnel”) within the Company.

As stated above, this policy is not intended to restrict or interfere with any employee’s federal or state labor law rights, including any and all rights to engage in protected concerted activity under the National Labor Relations Act, or any whistleblower protections under federal or state law.

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Social media provides inexpensive, informal, and timely ways to participate in an exchange of ideas and information. However, information posted on a website is available to the public and, therefore, the Company has established the following guidelines for Personnel participation in social media, regardless of whether the posting of the content to social media occurs while Personnel are providing services to or employed by the Company.

Social media platforms, including personal and professional websites, blogs, chat rooms, and bulletin boards; social networks, such as Facebook, LinkedIn, Instagram, Snapchat and Twitter; and video-sharing sites, tweets and e-mail, is a common means of sharing information with co-workers and with those outside the Company for the purposes of gathering information, generating new ideas, and learning from the work of others. Because online postings can conflict with the legitimate business interests of the Company, however, we have adopted the following policy.

Breach of this Policy may result in disciplinary action, up to and including immediate termination of employment.

The Company reserves the right to monitor social media platforms for references to the Company or for postings that are contrary to the Code, violate Company policies or customer requirements. The Company may for business purposes read any electronic communications composed, sent, or received through our Systems, as permitted by applicable laws. All such computer-generated documents, e-mail and Internet messages, transactions, and other electronic information as well as the equipment and technology provided to access the Internet, remain at all times the property of the Company. Personnel have no expectation of privacy when they use these Systems.

Confidentiality and Privacy. Do not disclose confidential or proprietary information of the Company) or personal identifying information of other employees or customers (such as account information, medical information, social security numbers, birthdates, home addresses and telephone numbers, and names of clients or customers) in online postings or publications. This prohibition, however, does not and is not intended to restrict the discussion of terms and conditions of employment. Sharing confidential and proprietary information, even unintentionally, could harm clients or customers, the Company, or employees of the Company, and result in legal action against you or the Company. This includes but is not limited to any photographs or other information related to business operations or client or customer sites.

Your Identity Online. Personnel are personally liable for all communications and information they publish online. The Company may be liable for online activity that uses Company resources, a Company email address or any email address that can be traced back to the Company's domain, which generally is any internet address affiliated with the Company. Personnel who use their name and a Company email address on external online sites, or who identify themselves as affiliated with the Company, may imply that they are acting on the Company's behalf.

Outside the workplace, Personnel have a right to participate in social media and networks using their personal email address. However, information and communications that Personnel publish on personal online sites should never appear to be endorsed by, or to have originated from, the Company, nor should it have the potential to violate the Code, any applicable Company policy, or customer requirement.

If Personnel choose to disclose their affiliation with the Company in an online communication such as a social platform, e-mail, blog, posting or chat room, they must treat all communications associated with the disclosure as professional communications governed by this and other Company policies, including the

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Code of Business Ethics and Conduct. If Personnel participate in social networking sites but do not use their Company e-mail address or otherwise identify themselves as being affiliated with the Company, they should keep in mind that many of their “friends” or contacts may work for the Company or could be customers or clients of the Company. As such, Personnel should keep in mind the tenets of this Policy even if they do not specifically state their affiliation with the Company in their on-line profile. **Violation of this Policy may lead up to and including termination.**

Accordingly, social media content that espouses, reflects or otherwise supports racist, sexist, anti-Semitic, homophobic or any other discriminatory ideas expressly violate the Company’s Code of Business Ethics and Conduct and its anti-discrimination and harassment policies. Similarly, social media content that promotes or implies violence or that appears to support or endorse violence against other people or institutions violates this policy and the Company’s Code of Business Ethics and Conduct. Personnel who make or support such content will be disciplined, up to and including termination.

Limitations on Online Publications. Obey the law. Do not post any information or engage in any online activity that violates applicable local, state, or federal laws. Identify all copyrighted or borrowed materials with citations and links. When publishing direct or paraphrased quotes, thoughts, ideas, photos, or videos, give credit to the original publisher or author.

Direct all requests for professional references for current or former Company employees to Human Resources. Comments about current and former employees may have legal consequences, even if Personnel make the comments personally and not on the Company’s behalf.

Do not maliciously or otherwise, threaten or defame the Company, the Company’s employees or clients, and/or customers. In addition, harassment, which is defined as unwelcome comments based on an employee or client/customer’s race, color, gender, religion, national origin, age, disability, military status, sexual orientation, genetic information, or any other category protected by applicable law, is strictly prohibited. Personnel who engage in any such harassment are subject to disciplinary action, up to and including termination. Misappropriating the Company’s trade secrets in a social media platform, website, blog, chat room, video-sharing site or bulletin board is also prohibited.

RELATED DOCUMENTS

- **Anti-Harassment and Violence in the Workplace Policy**
- **Code of Business Ethics and Conduct**

VERSION HISTORY

	Version	Version Date	Author	Description
1	1.0	11/20/2015	Human Resources	Initial version
2	2.0	6/1/2020	Beth Skoletsky	Updates to Section 3.0
3	3.0	2/1/2021	Beth Skoletsky	Updates throughout