MODEL SOCIAL MEDIA POLICY

These guidelines apply to Company employees for all forms of social media including, but not limited to: blogs, Facebook, Twitter, LinkedIn, YouTube and/or other social media sites and tools. These rules also apply to any comments you may leave on other blogs or Facebook pages, edits to wikis, responses to tweets, postings on message boards/forums, opinions on online polls or any product/services you might author.

When you are participating in social networking, you are representing both yourselves personally and the Company. It is not our intention to restrict your ability to have an online presence or to mandate what you can and cannot say. We believe social networking is a very valuable tool and continue to advocate the responsible involvement of all Company employees in this space. While we encourage this online collaboration, we would like to provide you with a Company policy and set of guidelines for appropriate online conduct and to avoid the misuse of this communication medium.

This policy is applied in conjunction with the Company's policies concerning Electronic Use, Security of Electronic Devices, Conflict of Interest/Code of Ethics, Standards of Conduct and other related policies.

POLICY GUIDELINES FOR USING SOCIAL MEDIA ON PERSONAL TIME:

- Posting of any financial, confidential, sensitive or proprietary information about the Company or any of our former and potential customers, partners and competitors is strictly prohibited. This does not apply to non-supervisory and non-managerial employees discussing Company wages, hours and working conditions among employees as protected by the National Labor Relations Act.

- Any content posted regarding our current, former and potential customers, partners and competitors must be truthful, accurate and respectful. The same guidelines hold true for Company vendors and business partners.

- Be aware that you are responsible for the content you post. Use privacy settings when appropriate. Remember, most content is visible immediately and does not expire.

- If you see unfavorable opinions, negative comments or criticism about yourself or the Company, do not try to have the post removed or send a written reply that will escalate the situation.

- If you are posting to personal networking sites and are speaking about job related content or about the Company, use a disclaimer and make it clear that these views are not reflective of the views of the Company, such as the following. "The opinions expressed on this site are my own and do not necessarily represent the views of the Company."

- Think of what you say online in the same way as statements you might make to the media, or emails you might send to people you don't know. Stick to the facts, try to give accurate information and correct mistakes right away.

- Be mindful that posting obscenities, slurs or personal attacks can damage both your reputation as well as the Company's. This does not apply to non-supervisory and non-managerial employees discussing Company wages, hours and working conditions among employees as protected by the National Labor Relations Act. Regardless, harassment of coworkers or others will not be tolerated.

- Do not infringe on copyrights or trademarks. Remember to cite where you saw information if it's not your own thoughts. This does not include non-supervisory and non-managerial employees using certain copyright and trademark material that is considered "fair use" and used in the context of discussing wages, hours and working conditions as protected by the National Labor Relations Act.

- You are not permitted to represent the Company with the media. If contacted by the media seeking comments or information from the Company, refer them to the Marketing Department.

RULES AND GUIDELINES WHEN USING SOCIAL MEDIA ON COMPANY'S BEHALF

When social networking, blogging or using other forms of web-based forums, the Company must ensure that use of these communications maintains our brand identity, integrity and reputation while minimizing actual or potential legal risks, whether used inside or outside the workplace. The following rules and guidelines apply to social networking and blogging when authorized by the Company and done on company time. The rules and guidelines apply to all employer-related blogs and social networking entries, including employer subsidiaries or affiliates.

- Only authorized employees can prepare and modify online content for the Company's website and/or social networking entries. Content must be relevant, add value and meet the specified goals or purposes developed by the Company. If uncertain about any information, material or conversation, discuss the content with your manager.

- All employees must identify themselves as employees of the Company when posting comments or responses on the Company's blog or on the social networking site.

- Posting of any financial, confidential, sensitive or proprietary information about the Company or any of our former and potential customers, partners and competitors is strictly prohibited.

- Any copyrighted information where written reprint information has not been obtained in advance cannot be posted.

- The Company is authorized to remove any content that does not meet the rules and guidelines of this policy or that may be illegal or offensive. Removal of such content will be done without permission of the blogger or advance warning.

EMPLOYER MONITORING

Employees are cautioned that they should have no expectation of privacy while using the Internet. Your postings can be reviewed by anyone, including the Company. The Company may use blog-search tools and software to monitor forums such as blogs and other types of personal journals, diaries, personal and business discussion forums, and social networking sites.

Employees are cautioned that they should have no expectation of privacy while using Company equipment or facilities for any purpose, including authorized blogging.

The Company reserves the right to use content management tools to monitor, review or block content on company blogs that violate Company blogging rules and guidelines.