

Policy Number 601-I

SUBJECT: SOCIAL MEDIA POLICY

Global Spectrum's (Company) social media and social networking policy applies to all Company employees (full-time or part-time) who use the following:

- Social networking sites such as MySpace, Facebook, Linked In, YouTube, and Twitter
- Blogs, Forums, or Chat rooms
- Wiki's
- Any other digital or virtual platforms not specifically mentioned.

In this policy, use of these on-line resources is referred to generally as "on-line activities."

The Company does not prohibit employees from engaging in on-line activities, including activities that might have some relationship to Global Spectrum or your work. For example, you might mention where you work on a social website. However, when you do undertake these activities, you must do so in accordance with this policy.

It is each employee's individual decision to engage in on-line activities, including social media sites. When you do engage in such activities, you should understand that you may be held accountable personally for your statements and representations. If you defame someone on-line, you could be held liable for your actions. Use of social websites should be strictly in accordance with their posted terms of use. Common sense is the underlying theme of this policy. Think of the consequences of what you post before you post it.

Please be aware that if you violate any Global Spectrum policy while participating in any on-line activity, you may be subject to disciplinary action up to and including termination, as well as possible legal action.

1. Company Time vs. Personal Time

You are free to use social networking sites on your own time using your own computer, unless your specific job responsibilities involve the use of such sites as authorized by Global Spectrum. Company time and resources should be used for Company business. Do not use Global Spectrum email addresses to register on social networks, blogs or other online tools used for personal use.

2. Follow Company Policies and Procedures

When it comes to employee activities on-line that relate to or share a connection with the Company or your work for the Company, the same principles and guidelines that apply to all activities of our employees in general, as referenced in our Personnel Policy Manual, apply to these activities. This policy applies to on-line activities at any time or location, including activities for Global Spectrum on company time or activities on a personal website during non-working hours or outside the workplace.

For example, on-line activities must not violate Company policies governing Respect in the Workplace, Rules of Conduct, and the Code of Ethics policies. This would include content that is illegal; obscene, vulgar, [bullying](#), or threatening; discriminatory, harassing or retaliatory; or infringes on [the](#)-privacy rights [of another individual](#).

Also, consistent with Policy 601-D, supervisors and managers must not provide online employment references.

3. Be Responsible with On-Line Communications

Always be fair and courteous to fellow associates, customers, members, suppliers or people who work on behalf of Global Spectrum. 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 outlet. Avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating [or](#) that disparage customers, members, associates or suppliers. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation: [posts that contain information or rumors you know to be false](#); or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.

4. Confidentiality

Your on-line activities should never disclose any Company information that could be considered trade secret, confidential or propriety. By way of example, this includes new business bids, concert and other bookings, marketing lists, customer account information, or financial data.

- Do not post internal reports, policies, procedures or other internal business-related confidential communications.

- Respect financial disclosure laws. It is illegal to communicate or give a “tip” on inside information to others so that they may buy or sell stocks or securities. Such online conduct may also violate the Insider Trading Policy.
- You may disclose confidential customer information only to those authorized to receive it in accordance with Global Spectrum privacy policies.

5. Respect All Copyrights and other Intellectual Property Laws

[It is critical that employees show proper respect for laws governing copyright, fair use of copyrighted material owned by others, trademarks and other intellectual property, including Global Spectrum’s own copyrights, trademarks and brands.](#)

6. Company Email Address

Do not use your Company email address in any personal profile unless you are the Company- appointed administrator for that site. Do not create a link from your blog, website or other social networking site to a Global Spectrum website without identifying yourself as a Global Spectrum employee.

7. Required Disclaimer

If you post information on a social website that identifies or could be associated with the Company in any way, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of Global Spectrum, fellow employees, customer’s suppliers, or people working on behalf of the company. Never represent yourself as a spokesperson for the company unless you are authorized to do so. It is best to include a disclaimer that the information is your own personal view. For example: “The postings on this site are my own and do not represent the positions, views or opinions of Global Spectrum.”

8. Retaliation is prohibited

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

9. Media contacts

Employees should not speak to the media on Global Spectrum's behalf without contacting the Corporate Public Relations Dept. All media inquiries should be directed to them.

10. Questions

Given the speed at which technology changes, it is not possible for a policy to address every situation involving on-line activities. This policy is intended to provide you with guidelines for most activities. [If you have questions or need further guidance, please contact Human Resources.](#)

**** Nothing in this policy prevents employees from communicating in a public forum about their wages, hours or working conditions. However, employees who have access to confidential records as a result of their job duties must maintain the confidentiality of those records.***