



Policy Owner:	Director of Corporate Communications
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Approved By:	Policy & Ethics Committee

## EXTERNAL COMMUNICATIONS POLICY

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### PURPOSE

This policy provides guidelines for handling American Transmission Company ('ATC' or the 'Company') external communications with the media and situations where there is potential for media presence.

### SCOPE

This policy applies to all ATC employees and contingent workers.

### DEFINITIONS

*ATC Confidential Information* – Information should be classified as ATC Confidential Information when the unauthorized disclosure, alteration, or destruction of that information could expose the Company or its affiliates to a significant level of risk or negatively impact regulatory compliance, business development, or the Company's ability to continue ongoing operations. Examples of ATC Confidential Information include trade secrets and proprietary information, Critical Infrastructure Protection (CIP) Information, Critical Energy Infrastructure Information (CEII), non-public transmission function information governed by the FERC Standards of Conduct, business development information, market information relating to ATC's business practices and strategies, customers' confidential information, private employee personnel and medical records including Personal Identifiable Information (PII) and Protected Health Information (PHI), private financial information relative to the Company's operations, etc. By default, all information that is not considered public information should be treated as ATC Confidential Information. If you are unsure if information should be considered ATC Confidential Information, please check with your supervisor before disclosing the information to anyone outside of the Company. For the purposes of this policy, ATC Confidential Information does not include information regarding the workplace and work environment generally, as well as information regarding wages, compensation, or other terms and conditions of employment with ATC. Employees may disclose information about themselves, such as information related to their job performance or their job duties.

*Commercial Media* – Commercial media includes traditional forms of the media such as newspapers, magazines, radio, broadcast or cable television, and industry trade publications. Commercial media organizations may also distribute their news stories through digital means, including email, social media, websites, and Internet-based radio and television.

*Contingent Worker* – See [Worker Classification Policy](#)

## **RESPONSIBILITIES**

Employees and contingent workers are responsible for:

- Directing media inquiries regarding ATC to Corporate Communications
- Maintaining the confidentiality of ATC’s trade secrets (including information regarding ATC’s systems, processes, products, know-how and technology, and other ATC Confidential Information)
- Complying with the Federal Energy Regulatory Commission (‘FERC’) [Standards of Conduct](#)
- Notifying Corporate Communications immediately upon witnessing any Commercial Media photographing or videotaping Company facilities or job sites
- Notifying Corporate Communications in advance of any external presentations in which you are representing yourself as acting on behalf of the Company
  - Note: Ensure to use the most current ATC PowerPoint template and take the Presentations Training in Excelerate
- Notifying Corporate Communications of any request by a supplier or contractor to use ATC’s name and/or logo
- Notifying Corporate Communications of any unauthorized use of the Company’s name or logo by an outside party
- Clearly disclosing your status as an ATC employee or contingent worker when communicating about ATC in a promotional context (including online testimonials and endorsements about ATC or its services)

Employees and contingent workers should not:

- Represent themselves as a Company spokesperson to the Commercial Media or otherwise speak to the Commercial Media on ATC’s behalf, without prior authorization from Corporate Communications
- Disclose design, construction, or maintenance specifications or standards, internal reports, policies, procedures, or other internal communications containing ATC Confidential Information
- Permit ATC’s suppliers and contractors to use ATC’s name and/or logo, without prior authorization from Corporate Communications

## **REPORTING**

It is the responsibility of all ATC employees to report any suspected violations of this policy, in accordance with ATC’s [Open Door Policy](#).

## **EXCEPTIONS/VIOLATIONS**

Exceptions to this policy require the approval of the Policy Owner listed above.

Employees who violate this policy are subject to disciplinary action, up to and including termination.

This policy is not intended by ATC and will not be interpreted or applied by ATC to prohibit or dissuade employees from engaging in legally protected activities such as discussing wages, benefits, or terms and conditions of employment; forming, joining or supporting labor unions; or bargaining collectively through representatives of their choosing.