



Policy Owner:	Director of Corporate Communications
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## SOCIAL MEDIA POLICY

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### PURPOSE

Social Media tools are a powerful form of communication that can have a significant impact on organizational, professional and individual reputations.

Employees must exercise care when participating in Social Media, as the lines between personal and professional content, lawful and unlawful, and between public and private content, are often blurred. Whether participating on behalf of American Transmission Company ('ATC' or the 'Company') or personally, employees should follow the same standards of behavior online as they would if in person. Remember that the internet is not anonymous, and it does not forget.

The purpose of this policy is to provide guidelines for appropriate and acceptable Social Media usage.

### 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.

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

*Social Media* – Social Media includes all means of communicating or posting information or content of any sort via the internet, public forums, software programs and applications, and any other new or emerging technology. Social Media also covers content in the form of posts, re-posts, shares, statements, pictures, gifs, emojis, memes, etc. This policy applies to Social Media activity, as described herein, whether or not associated or affiliated with ATC.

## **RESPONSIBILITIES**

Employees and contingent workers are responsible for:

- Using good judgment when posting and thinking about the consequences of what you are posting
  - You are responsible for anything you write or do online. Everything written online can be traced back to its author.
  - Assume what is written will spread. Information is often repeated and linked to other sources, so you never know when an incidental comment can go viral.
- Ensuring that Social Media postings are in alignment with ATC’s [Code of Conduct](#) and the following supporting policies:
  - [External Communications Policy](#)
  - [Acceptable Use of Electronic Resources Policy](#)
  - [Equal Employment, Non-discrimination and Anti-harassment Policy](#)
  - [Workplace Violence Prevention Policy](#)
- Using caution when posting and being respectful of others
  - Maliciously false, obscene, physically threatening, unlawfully harassing or bullying, or discriminatory postings may create potential legal liability for both you and ATC. 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 race, sex, disability, religion or any other status protected by law or ATC policy.
  - If ATC determines that a posting by an employee may create potential criminal or civil liability for the Company, it reserves the right to demand the posting be removed.
- Ensuring that Social Media activities do not interfere with job responsibilities during work time
- 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](#)
- Protecting yourself and ATC against liability for copyright or trademark infringement, where appropriate, by referencing sources of particular information you post or upload and by citing them accurately
- Reviewing the terms of use of Social Media sites visited to ensure your compliance with them, paying particular attention to the following:
  - Prohibitions or restrictions on the use of the Social Media site, including use for advertising, marketing, promotions, or other commercial purposes (for example, Facebook’s Statement of Rights and Responsibilities and accompanying Promotional Guidelines specifying the terms for businesses administering promotions through Facebook)
  - Ownership of intellectual property used on, or information collected or generated through use of, the site (for example, ownership and use of user information the site owner collects through the site)
  - Requirements for licenses or other permissions allowing use by the site user and other third parties of the site owner’s trademarks or other intellectual property
  - Privacy rights and responsibilities of the site owner and users

Employees and contingent workers should not:

- Use ATC email addresses to register on personal social networks, blogs, or other online tools
- Disclose design, construction, or maintenance specifications or standards, internal reports, policies, procedures, or other internal communications containing ATC Confidential Information
- Expose yourself or ATC to legal risk by using a Social Media site in violation of its terms of use (if using Social Media as part of your job responsibilities)

This policy does not prohibit employee conduct that takes place on employees' own time or during breaks that is for the purpose of engaging in protected activity such as communications regarding wages, benefits, or terms and conditions of employment; forming, joining or supporting labor unions; or bargaining collectively through representatives of their choosing.

ATC recognizes that employees are a company's best ambassadors and, as such, encourages you to promote ATC on Social Media to help expand ATC's reach. You may do so by, for example, following ATC on Twitter, LinkedIn, YouTube and the ATC external blog and sharing the following through your personal Social Media accounts:

- Public ATC news
- Your involvement in representing or promoting ATC at events (also share this information with Corporate Communications so your involvement can be promoted on ATC's corporate Social Media accounts)
- Your involvement in professional, industry and ATC-sponsored charity events
- Job openings and postings and reviews of ATC as an employer of choice on various job board sites

Employees may have access to certain Social Media sites (e.g. YouTube and LinkedIn) while using ATC-provided equipment on ATC's network, and such sites can serve as work resources. Access to other Social Media sites may be blocked in accordance with ATC's [Acceptable Use of Electronic Resources Policy](#).

## **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.