

PURPOSE

Social Media tools are a powerful form of communication that can have a significant impact on organizational, professional and individual reputations. The purpose of this Policy is to provide guidelines for appropriate and acceptable Social Media usage.

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 ATC 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.

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.

SCOPE

This Policy applies to all ATC employees, contingent workers and contractors. This Policy applies to Social Media activity, as described herein, whether or not associated or affiliated with ATC.

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 Federal Energy Regulatory Commission (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

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, refer to the Enterprise Information Management, Acceptable Use and External Communications policies.

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 ATC's 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.

RESPONSIBILITIES

Employees, contingent workers and contractors, 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.
 - Maintain good security practices - do not include locations or post in real time for internal events.
- Confirming that Social Media postings are in alignment with ATC's Code of Conduct and the following supporting policies:
 - External Communications Policy
 - Acceptable Use of ATC Resources Policy
 - Equal Employment, Non-discrimination and Anti-harassment Policy
 - Workplace Violence Prevention Policy
- Using caution when posting and being respectful of others, keeping in mind that:
 - 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.
- Not allowing Social Media activities to interfere with job responsibilities during work time.
- Maintaining the confidentiality of ATC's trade secrets, including information regarding ATC's systems, processes, products, knowledge and technology, and other ATC Confidential Information.
- Complying with the FERC Standards of Conduct.
- Protecting yourself and ATC against liability for copyright or trademark infringement, where appropriate, by referencing sources of information you post or upload and by citing them accurately.
- Complying with the terms of use for Social Media sites visited.

Employees, contingent workers and contractors should not:

- Use ATC email addresses to register on personal social networks, blogs, or other online tools.
- Expose yourself or ATC to legal risk by using a Social Media site in violation of its terms of use
- Post pictures that include ATC proprietary information (security badges, equipment, etc.).
- Deliberately provoke an argument or emotional reaction or respond to negative comments on behalf of ATC or engage in negative discussions on ATC's Social Media feed.

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REPORTING

It is the responsibility of all ATC employees, contingent workers and contractors to report any suspected violations of this policy, in accordance with ATC's Open Door Policy.

NON-RETALIATION

ATC strictly prohibits retaliation in any way against anyone who has honestly made a report or complaint, expressed a concern about inappropriate conduct or cooperated in an investigation. Disciplining or otherwise disadvantaging an individual because they, in good faith, reported a potential concern or cooperated in an investigation is, itself, a violation of ATC policy.

EXCEPTIONS/VIOLATIONS

Exceptions to this Policy require the approval of the Policy Owners listed above. Employees, contingent workers or contractors 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.