

POLICY:

At Chatham Area Transit (CAT), we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends, and co-workers around the world. CAT also recognizes that emerging online collaboration platforms are fundamentally changing the way individuals and organizations communicate. However, use of social media presents certain risks and carries with it certain responsibilities, and we have established this policy to offer practical guidance for responsible, constructive communications via social media channels for CAT employees.

The same principles and guidelines that apply to the activities of CAT employees in general, as found in the Code of Business Conduct Policy, for example, apply to CAT employee activities in social media channels and any other form of online publishing.

Our organization fully respects the legal rights of our employees in all countries in which we operate, including their rights regarding labor relations and organization and any part of this policy which interferes with or "chills" the legal rights of our employees will not be enforced. In general, what you do on your own time is your affair. However, activities in or outside of work that affect your CAT job performance, the performance of others, or CAT's business interests are a proper focus for company policy.

OBJECTIVES:

1. Establish practical, reasonable, and enforceable guidelines by which CAT employees can conduct responsible, constructive social media engagement in both official and unofficial capacities.
2. Prepare our company and employees to utilize social media channels to help each other and the communities CAT serves, particularly in the event of a crisis, disaster, or emergency.
3. Promote a safe environment for employees to share subject matter expertise that is not proprietary and earn management's recognition for the outstanding use of social media for business.
4. Protect our company and employees from violating Municipal, State, or Federal rules, regulations, or laws through social media channels.

DEFINITIONS:

Social Media Channels - Blogs, micro-blogs, wikis, social networks, social bookmarking services, user rating services, and any other online collaboration/sharing/publishing platform, whether accessed through the web, a

mobile device, text messaging, email or any other existing or emerging communications platform.

External vs. Internal Social Media Channels – External social media channels are social media services that do not reside at a CAT domain. Internal social media channels are located at a company-owned domain, require a password to access, and are only visible to CAT employees and other approved individuals.

Social Media Account – A personalized presence inside a social networking channel, initiated at will by an individual. YouTube, Twitter, Facebook, and other social networking channels allow users to sign-up for their own social media account, which they can use to collaborate, interact, and share content and status updates. When a user communicates through a social media account, their disclosures are attributed to their User Profile.

User Profile – Social Media Account holders customize their User Profile within a Social Media Channel with specific information about themselves which can be made available others users.

Social Media Disclosures - Blog posts, blog comments, status updates, text messages, posts via email, images, audio recordings, video recordings, or any other information made available through a social media channel. Social media disclosures are the actual communications a user distributes through a social media channel, usually by means of their social media account.

Tweets and Retweets – A tweet is a 140 character social media disclosure distributed on the Twitter micro-blogging service. Retweets are tweets from one Twitter user that are redistributed by another Twitter user. Retweets are how information propagates on Twitter.

Hosted Content – Text, pictures, audio, video, or other information in digital form that is uploaded and resides in the social media account of the author of a social media disclosure. If you download content off of the Internet, and then upload it to your social media account, you are hosting that content. This distinction is important because it is generally illegal to host copyrighted content publicly on the Internet without first obtaining the permission of the copyright owner.

Copyrights – Copyrights protect the right of an author to control the reproduction and use of any creative expression that has been fixed in tangible form, such as literary works, graphical works, photographic works, audiovisual works, electronic works, and musical works. It is illegal to reproduce and use copyrighted material through social media channels without the permission of the copyright owner.

Embed Codes – Unique codes that are provided to entice others to share online content without requiring the sharer to host that content. By means of an embed

code, it is possible to display a YouTube user's video in someone else's social media account without requiring that person to host the source video file. This distinction is important because embed codes are often used by copyright owners to encourage others to share their content via social media channels.

Inbound Links – An inbound link is a hyperlink that transits from one domain to another. A hyperlink that transits from an external domain to your own domain is referred to as inbound link. Inbound links are important because they play a role in how search engines rank pages and domains in search results.

Link Bartering Exchanges – Trading or purchasing inbound links from other domains exclusively for the purposes of lifting your domain in search engine page results.

Controversial Issues – Issues that form the basis of heated debate, often identified in political campaigns as wedge issues, since they provoke a strong emotional response. Examples include political views, health care reform, gun control, and abortion. Religious beliefs may also be controversial, particularly to those intolerant of beliefs different from their own.

Official CAT Content – Publicly available online content created and made public by our company, verified by virtue of the fact that it is accessible through our corporate website.

GUIDING PRINCIPLES:

1. Our organization trusts and expects employees to exercise personal responsibility whenever they use social media, which includes not violating the trust of those with whom they are engaging. Employees should never use social media for covert advocacy, marketing, or public relations. If and when employees use social media to communicate on behalf of CAT, they should clearly identify themselves as employees.
2. Only those officially designated can use social media to speak on behalf of CAT in an official capacity, though employees may use social media to speak for themselves individually or to exercise their legal rights regarding labor relations and organization.
3. When you see misrepresentations made about CAT by media, analysts, bloggers or other social media users, you may certainly use your blog, social networking account, or someone else's to point that out. But you may only do so in an official capacity if you follow the terms of this policy. CAT would prefer you share these misrepresentations with the Communications Coordinator to determine whether or not an official response is warranted.
4. Different social media channels have proper and improper business uses. For

example, members of social networks are expected to read, and when appropriate respond, to questions asked of them from another member of their social network. It is important for employees to understand what is recommended, expected, and required when they discuss CAT or CAT-related topics, whether at work or on their own time.

5. Employees are responsible for ensuring that all contractors, vendors, and agencies that the company has a formal relationship with have received and agreed to abide by these guidelines in writing.

6. Employees are responsible for making sure that their online activities do not interfere with their ability to fulfill their job requirements or their commitments to their managers, co-workers, or customers.

POLICY SPECIFICS:

The same principles and guidelines found in CAT policies and listed above, plus three basic beliefs apply to your activities online. 1. Ultimately, you are solely responsible for what you post online. 2. Before creating online content, consider some of the risks and rewards that are involved. 3. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow associates, or otherwise adversely affects members, customers, suppliers, people who work on behalf of CAT or CAT's legitimate business interests may result in disciplinary action up to and including termination.

Know and follow the rules

Carefully read these guidelines, the CAT Code of Business Ethics Policy, and the CAT Unlawful Harassment Policy, and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Be respectful

Always be fair and courteous to fellow associates, customers, members, suppliers or people who work on behalf of CAT. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or by utilizing management's open door policy than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, members, associates or suppliers, or that might constitute harassment or bullying. 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 company policy.

Be honest and accurate

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about CAT, fellow associates, members, customers, suppliers, people working on behalf of CAT, or competitors.

Post only appropriate and respectful content

- Maintain the confidentiality of CAT trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. 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.
- Do not create a link from your blog, website or other social networking site to a CAT website without identifying yourself as a CAT associate.
- Express only your personal opinions. Never represent yourself as a spokesperson for CAT. If CAT is a subject of the content you are creating, be clear and open about the fact that you are an associate and make it clear that your views do not represent those of CAT, fellow associates, members, customers, suppliers or people working on behalf of CAT. If you do publish a blog or post online related to the work you do or subjects associated with CAT, make it clear that you are not speaking on behalf of CAT. It is best to include a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of CAT.”

Using social media at work

- Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with the Authority-Provided Cellular Telephone, Radio, Laptop or Other Communication Policy.
- Do not use CAT email addresses to register on social networks, blogs or other online tools utilized for personal use.

Retaliation is prohibited

CAT prohibits taking negative action against any associate for reporting a possible deviation from this policy or for cooperating in an investigation. Any associate who retaliates against another associate 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.

Media contacts

Associates should not speak to the media on CAT's behalf without contacting the Public Information Officer (PIO). All media inquiries should be directed to the PIO or his or her designee.

For more information

If you have questions or need further guidance, please contact your HR representative.

APPLIES TO:

All employees of Chatham Area Transit Authority.