



# Social Media Policy Statement

## Introduction

At VillageCare, we recognize and encourage our employees' active participation in social media and online communications.

This Policy is designed to guide you in making responsible decisions when creating, posting or otherwise contributing to blogs, social networks, wikis, virtual worlds or other social media. Whether you use external sites such as Facebook, LinkedIn, Twitter, YouTube, Google+, Instagram, Pinterest or Wikipedia or internal sites or comment on blogs or any form of digital media. The Policy covers three main areas:

1. Basic principles for all types of social media
2. Special guidelines for official use of social media on behalf of the company
3. Special guidelines for personal use of social media

## Basic Principles

These principles apply to official use of social media on behalf of our company as well as personal use.

- **Adhere to our [Code of Conduct](#)** . You can access a copy of this document on the organization's website.
- **Use common sense and good judgment.** You're accountable for your actions and your statements could have an impact on others. Remember that what you post or publish may be public information for a long time.
- **Don't post information or news that you know is false.** If you realize that you've make a mistake or error, correct it quickly.
- **Be respectful.** Always be fair and courteous to fellow co-workers, customers, vendors, suppliers or people who work on behalf of VillageCare even if you disagree with their opinion. A conversational, personal tone often works best – similar to how you'd speak.
- **Be sensible.** When posting, avoid using statements, photos, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, co-workers or vendors, suppliers, or that might constitute harassment or bullying. Examples of this type of 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, color, religion, sex/gender

(including pregnancy), gender identity and expression, national origin, disability, marital status, age, sexual orientation, citizenship status, Veteran status or any other classification protected by applicable law, rules or regulations.

- **Be transparent and disclose your relationship to the company.** If you're writing about VillageCare or our services or industry, use your real name (not a pseudonym), identify that you work for VillageCare and be clear about your role. If you have a vested interest in what you're discussing, be the first to openly say so.
- **Maintain the confidentiality of our patient's, business and proprietary information.** Don't externally post or share patient health information - this includes posting photographs of patient's in our care settings and in their home. Don't post business-related, confidential information or communications that belong to VillageCare or our customers, vendors, suppliers or others, such as customer lists, financial data, systems and technology information, intellectual property and operating plans. This type of information also shouldn't be shared with others at VillageCare unless there's a legitimate "need to know" and you're authorized to do so. If you're uncertain whether information is meant to be private or internal to VillageCare, seek the advice of Corporate Compliance Officer, General Counsel or your Manager.
- **Refer media, press and investor inquiries to our authorized company spokespersons if an official company response is needed.** Employees should not speak on VillageCare's behalf with the media, press without contacting the AVP Corporate Communications.
- **Minimize security risks.** Social media sites and accounts can attract hackers and can present risks to corporate networks as well as your personal computer or mobile device. A compromised account can also cause disclosure concerns for our company. To minimize these risks, use a password for social media accounts that isn't easy to guess. Monitor your social media accounts periodically if you don't actively use them. Also, be mindful that social media sites sometimes are used to distribute malicious software or code, or "malware". If you think a link sent to you might be malware, don't click on it, as it could result in software or code being downloaded or installed on your own computer, mobile device and/or the company's networks.

## Special Guidelines: Official Use

- **Official company use of social media.** Official use of external VillageCare - sponsored blog, website, podcast, account, page, group, etc. related to our business, products or services, is managed by the AVP Corporate Communications.

## Special Guidelines: Personal Use

- **Your personal use of social media use shouldn't interfere with your responsibilities at VillageCare.** Our computer systems are to be used primarily for business purposes. While incidental personal use of our systems at work may be acceptable under certain circumstances, excessive use of our computer systems for your personal use of social media and social networks could result in the company limiting your ability to engage in these activities during work time and/or taking disciplinary action.

- **If needed, clarify in a post or comment that you're expressing your own views and opinions and not those of our company.** While this type of clarification probably won't be needed for most posts and comments, sometimes it will be important or necessary to distinguish between personal views and company views, depending on the topic.
- **Don't host personal blogs, websites or other types of online content** on property owned or leased by VillageCare.

## Violations

If you violate this policy, we may require you to correct, edit or remove a post or statement. In addition, violations of these guidelines by employees can result in disciplinary action, including termination of employment.

This Policy Statement will be administered in accordance with applicable laws, rules and regulations.