Sample COMPANY Electronic Communication Policy

Policy Purpose
To maximize the benefits to COMPANY and its employees of electronic communications, while protecting COMPANY and its employees from liability and/or performance challenges caused by the improper or unauthorized use of the systems made available to facilitate the business of the company.

Company Property
As a productivity enhancement tool, COMPANY provides and encourages the business use of electronic communications (including but not limited to voice mail, electronic mail, instant messaging, text and SMS messages and fax). Electronic communications systems, owned by COMPANY, and all messages generated on or handled by these electronic communications systems, including back-up copies, are considered to be the property of COMPANY. Any attempt to violate, circumvent and/or ignore these policies could result in disciplinary action, up to and including termination.

Authorized Usage
COMPANY’s electronic communications systems must be used solely to facilitate the business of the company. Employees are forbidden from using COMPANY electronic communication systems for private business activities, personal, or amusement/entertainment purposes. Employees are reminded that the use of corporate resources, including electronic communications, should never create either the appearance or the reality of inappropriate use. Inappropriate use may result in loss of access privileges and disciplinary action, up to and including termination.

Proper Usage
Employees are strictly prohibited from using Company computers, e-mail systems, and Internet access accounts for personal reasons or for any improper purpose. Some specific examples of prohibited uses include, but are not limited to:

- Transmitting, retrieving, downloading, or storing messages or images that are offensive, derogatory, off-color, sexual in content, or otherwise inappropriate in a business environment.

- Making threatening or harassing statements to another employee, or to a vendor, customer, or other
outside party.

- Transmitting, retrieving, downloading, or storing messages or images relating to race, religion, color, sex, national origin, citizenship status, age, handicap, disability, sexual orientation, or any other status protected under federal, state and local laws.

- Communicating confidential Company information to individuals inside or outside the Company or to other organizations, without specific authorization from management to do so.

- Sending or receiving confidential or copyrighted materials without prior authorization.

- Soliciting personal business opportunities, or personal advertising.

- Gambling, monitoring sports scores, or playing electronic games.

<table>
<thead>
<tr>
<th>User Passwords</th>
<th>Regardless of the circumstances, individual passwords must never be shared or revealed to anyone else besides the authorized user.</th>
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<tbody>
<tr>
<td>User Identity</td>
<td>Misrepresenting, obscuring, suppressing, or replacing a user’s identity on an electronic communications system is forbidden. The user name, electronic mail address, organizational affiliation, and related information included with electronic messages or postings must reflect the actual originator of the messages or postings.</td>
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<tr>
<td>No Expectation of Privacy</td>
<td>Employees should expect that all information created, transmitted, downloaded, received or stored in company computers, or other electronic devices may be accessed by the company at any time, without prior notice. Employees should not assume that they have an expectation of privacy or confidentiality in such messages or information (whether or not such messages or information is password protected), or that deleted messages are necessarily removed from the system.</td>
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Regular Message Monitoring

Contents of electronic communications may be monitored and the usage of electronic communications systems will be monitored to support operational, maintenance, auditing, security, and investigative activities. The company reserves the right to disclose any electronic messages to law enforcement officials without prior notice to any employees who may have sent or received such messages. Employees should structure their electronic communications in recognition of the fact that COMPANY will, from time to time, examine the content of electronic communications. Employees are reminded that all messages are company records. Therefore, COMPANY reserves the right to access and disclose all messages sent over its electronic messaging systems or stored on its computers and electronic devices.

Monitoring Use

COMPANY may monitor and collect data about electronic communications and Internet use.

Contents of Messages

Workers must not use profanity, obscenities, or derogatory remarks in electronic messages. Such remarks—even when made in jest—may create legal issues. Special caution is warranted because backup and archival copies of electronic mail may actually be more permanent and more readily accessed than traditional paper communications. Therefore, transmission of obscene, harassing or otherwise inappropriate messages is strictly prohibited.

Message Forwarding

Recognizing that some information is intended for specific individuals and may not be appropriate for general distribution, electronic communications users should exercise caution when forwarding messages. COMPANY’s sensitive information must not be forwarded to any party outside COMPANY without the prior approval of a local Department Manager. Blanket forwarding of messages to parties outside COMPANY is prohibited unless the prior permission of the Department Manager and the Chief Information Officer has been obtained.

Handling Information About Security

Employees must promptly report all information security alerts, warnings, suspected vulnerabilities, and the like to the Chief Information Officer. Employees are prohibited from utilizing COMPANY systems to forward such information to others, whether internal or external to COMPANY.

Public Representations

No media release or advertisement, Internet posting,
electronic bulletin board posting, electronic mail message, voice mail message, or any other public representation about COMPANY may be issued unless it has first been approved by Marketing management, and/or Customer Service Department Management and in-house legal counsel prior to usage.

User Backup

If an electronic mail message contains information relevant to the completion of a business transaction, contains potentially important reference information, or has value as evidence of a COMPANY management decision, it should be retained for future reference. Most electronic mail messages will not fall into these categories, and accordingly can be erased after receipt. Electronic mail systems are not intended for the archival storage of important information, as stored electronic mail messages can be periodically expunged by systems administrators, mistakenly erased by users, and otherwise lost when system problems occur.

Archival Storage

All official COMPANY electronic mail messages, including those containing a formal management approval, authorization, delegation, or handing over of responsibility, or similar transaction, must be archived/copied to individual user archive files within the Outlook e-mail facility.

Purging Electronic Messages

Messages no longer needed for business purposes must be periodically purged by Employees from their electronic message storage areas (including Outlook’s out boxes, in-boxes, and file folders). It is recommended that after ninety (90) days electronic messages stored on Outlook’s e-mail systems be deleted by the individual users. After seven (7) days e-mail which has been sent to “Trash” will automatically be purged. Not only will this increase scarce storage space, it will also simplify records management and related activities. For Voice Mail, messages are saved for 30 days then purged. Undeliverable messages are automatically deleted.

Harassing or Offensive Materials

Sexually explicit words and images, ethnic slurs, racial epithets, religious or political statements or anything else that may be construed as harassment or disparagement of others based on their race, national origin, gender, sexual orientation, age, religious beliefs, or political beliefs may not be displayed or transmitted. Unwanted telephone calls, electronic mail, and internal mail are strictly prohibited and are cause for disciplinary action including termination.
Employees are encouraged to immediately report any offensive electronic mail messages, telephone calls, and/or other communication to their manager and the Human Resources Department.