

**Cottonwood, Inc.
Policies and Procedures**

SECTION: General

POLICY NO: 02-033

SUBJECT: Social Media

EFFECTIVE DATE: April 2012

Policy:

Cottonwood, Inc. management will allow access to social media sites on Cottonwood Inc.'s network as per job necessity and approved purpose. Cottonwood, Inc. understands that some employees participate in social networking sites (e.g. Facebook, Twitter, YouTube, LinkedIn) and chat rooms, and create and maintain personal websites, including blogs. However, an employee's online presence can affect Cottonwood, Inc. as words, images, posts, and comments can reflect or be attributed to Cottonwood, Inc. Employees will be mindful to use electronic media as it pertains to Cottonwood, Inc. responsibly and respectfully. This applies while at work or on personal time because employees' online comments and postings can impact Cottonwood, Inc.'s image and reputation as well as the way employees are spending their time at work. Cottonwood, Inc. has adopted the following guidelines that employees must observe when participating in social networking sites.

It shall be considered a breach of acceptable conduct to post on any public or private website or other forum, including but not limited to discussion lists, newsgroups, listservs, blogs, information sharing sites, social media sites, business networking sites such as LinkedIn, or any other electronic or print communication format, any of the following:

- (1) Anything that may harm the goodwill or reputation of Cottonwood, Inc. or any disparaging information about Cottonwood, Inc.
- (2) Any disparaging, discriminatory or harassing information concerning any customer, employee, persons served, vendor or other person associated with Cottonwood, Inc. Cottonwood Inc.'s policies prohibiting harassment apply online as well as offline.
- (3) Any confidential information, trade secrets, or intellectual property of Cottonwood, Inc. obtained during your employment, including information relating to finances, research, development, marketing, customers, operational methods, plans and policies.
- (4) Any information or images relating to contracts with the Department of Defense contracts.
- (5) Any private information relating to a customer, employee, person served or vendor of Cottonwood, Inc.

- (6) No Cottonwood, Inc. employee shall share images and/or information on their personal social media accounts about individuals served other than official Cottonwood, Inc. posts.

In compliance with applicable regulations of the Federal Trade Commission, employees endorsing Cottonwood, Inc.'s products or services must disclose their employment relationship with Cottonwood, Inc. and must ensure that endorsements do not contain representations that are deceptive or cannot be substantiated. *If you are speaking about job-related content or about Cottonwood, Inc. you must either clearly identify yourself as a Cottonwood, Inc. employee, or speak in the first person and use a disclaimer to make it clear that the views expressed belong solely to you. In addition, the following statement must be used, "The opinions expressed on this site are my own and do not necessarily represent the views of Cottonwood, Inc."*

This Policy applies regardless of where or when employees post or communicate information online. It applies to posting and online activity at work, home or other location and while on duty and off duty. Please see policy 02-024 "Computer Internet and E-mail Use" for an explanation of Cottonwood Inc.'s internet use and email monitoring practices.

Procedures:

1. Cottonwood, Inc.'s Facebook site or any other social networking sites will be created and managed by the Community Relations Design and Event Coordinator and/or a member of the IT Dept. with oversight by the Director of Community Relations.
2. Cottonwood, Inc.'s social media pages will be monitored daily by the Community Relations Design and Event Coordinator and/or a member of the IT Dept.
3. Comments appearing on Cottonwood, Inc.'s social media sites will be moderated. Only the Community Relations Design and Event Coordinator and/or a member of the IT Dept. will be able to respond to posts under the direction of Director of Community Relations and/or CEO.
4. The Community Relations Design and Event Coordinator and/or member of the IT Dept. will only take down comments under the direction of Director of Community Relations and/or CEO.
5. Employees who violate Cottonwood, Inc.'s Social Networking Policy will be subject to disciplinary action, up to and including termination of employment.