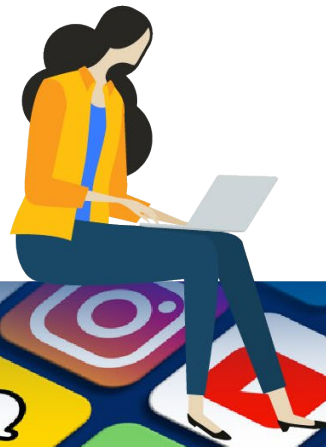


SOCIAL MEDIA POLICY

HQ Offices



July 29th, 2020

Purpose:

The Company recognizes that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media channels, including, but not limited to, Facebook, WhatsApp, TikTok, Snapchat, LinkedIn, Twitter, Foursquare, Instagram, Pinterest, Tumblr, Google+, YouTube, podcasts, blogs, wikis, and any other social media channel created in the future. However, employees' activities on social media can pose risks to the Company's confidential and proprietary information, reputation, brands, and can expose the Company to discrimination and harassment claims. Employees' online activities can also jeopardize the Company's compliance with business rules and laws. To minimize these risks and better manage the Company's IT resources and communications systems, the Company expects its employees to adhere to the following policy regarding social media use, whether for personal or business purposes, in consideration of their employment relationship with the Company.

The Company also trusts its Employees to demonstrate the behaviors of [Sangre Tigo](#) in their online activities as they demonstrate in the work environment.

Compliance with the Company's Employee Handbook and Other Policies:

Social media should never be used in a way that violates this Social Media Policy, the Company's Employee Handbook, Code of Conduct, or any other applicable Company's policy. All Company's policies and procedures continue to apply with respect to all social media activities of employees. Employees should consider that if a social media activity violates any of the Company's policies in another forum, it will also violate them in an online forum. For example, employees are prohibited from using social media to:

- Violate the Company's IT resources, information security systems, and any relevant procedures;
- Violate the Company's confidentiality and proprietary rights;
- Violate the Company's privacy practices and policies; or
- Violate any other ethical standards or applicable laws.

Employees who violate this policy or any other of the Company's policies may be subject to discipline, up to and including termination of employment, to the extent permitted by applicable law. Nothing in this policy is intended or will be applied to prohibit employees from exercising their rights protected under federal, state, or local labor or employment law, including concerted discussion of wages, hours, or other terms and conditions of employment.

General Principles for Personal Social Media Use:

The Company respects the right of employees to use online communication as a form of self-expression. However, employees should remember that social media activity is public and permanent and that anything written online can be traced back to its author. The Company needs to ensure that such communications do not result in the improper disclosure of the Company's confidential information and that it is clear in those communications that employees do not have authority to speak on behalf of the Company. Thus, employees who choose to engage in social media must adhere to the following guidelines:

- 1) Do not disclose any Company confidential information.
- 2) Do not disclose any information about a specific customer or vendor unless permission has been granted by the Company's Legal team or such information is otherwise publicly available.

- 3) Do not post videos, pictures, or any other written or audio reproduction of the Company's property, offices, equipment, products, customers, vendors, or visitors to the Company's property. Notwithstanding, in certain circumstances, employees are permitted to post Company's events pictures or videos on their own personal social media accounts, provided that such content does not violate any confidential, proprietary or privacy obligations. *(Please refer to the additional guidelines included in the Social Media Policy Q&A document).*
- 4) Do not use the Company's logo, trademarks and other registered marks, and other intellectual property unless authorized by the Company's Legal team. Notwithstanding, in certain circumstances, employees are permitted to post Company's events pictures or videos on their own personal media accounts, wearing clothing or accessories with Company's logo, provided that such content does not violate any of employees' obligations set forth in these General Principles. *(Please refer to the additional guidelines included in the Social Media Policy Q&A document).*
- 5) Do not use Company email addresses to register on social networks, blogs, or other online tools utilized for personal use unless previously authorized by the Corporate Communications team.
- 6) Absent prior written authorization from the Company, employees are not authorized to speak on behalf of the Company or represent that such authority has been granted. The Company will not validate or endorse any content contributed by employees who are not authorized to do so. If employees are designated to speak on behalf of the Company in a social media environment, employees must confirm that they have the approval from Senior Management, the Corporate Communications team, the Marketing team, or the Corporate Responsibility team, as applicable. Likewise, if an employee is contacted for comment about the Company for publication, including on any social media outlet, the employee must direct the inquiry to the Corporate Communications team and cannot respond without their written approval.
The employees that express their personal opinion on matters related to the Company's business must make it clear to readers in any communication discussing or mentioning the Company that the views expressed are the employee's alone and do not represent the views of the Company.
- 7) If you create a link from your blog, website, or other social networking site to the Company website, to any of the Company's social media accounts, or to a product or service of the Company, you must identify yourself as a Company employee.
- 8) Do not add to or alter comments, posts, tweets, pins, etc., that come from the Company social media account on your personal social media accounts, or respond to any information (including misinformation) posted by entities not related to the Company about the Company and its products in social media, unless designated by the Company to do so, even if such information is known to be false.
- 9) Use good judgment about what you post and remember that anything you say can reflect on the Company, even if you do include a disclaimer. The Company encourages you to act with professionalism, accuracy and honesty in social media and other communications.
- 10) Avoid making defamatory statements and/or using malicious, obscene, threatening, or harassing language about the Company, its products and services, fellow employees, management, partners, customers, vendors and competitors, among others.
- 11) Respect others' privacy. Do not publish personal identifiable information or sensitive personal information about other employees, management, partners, customers, vendors and competitors, without the prior written consent of that individual.
- 12) Use discretion in establishing or maintaining social media relationships with other employees. Neither supervisors nor direct reports should feel pressured to accept any social media requests from anyone at the Company.

Note: Sections 3-6 of the General Principles do not apply to those employees who are specifically authorized in writing to engage in certain social media activities by the Corporate Communications team or the applicable local Communications team in each operation.

Use of Social Media:

Employees should only express personal opinions on matters related to the Company when using social media. Absent prior written permission from the Company, employees are not authorized to speak on behalf of the Company or represent that such authority has been granted.

Employees that express their personal opinions on matters related to the Company's business (e.g., by posting about the Company or sharing/reposting a Company social media post) must make it clear to readers in any communication discussing or mentioning the Company that the views expressed are the employee's alone and do not represent the views of the Company.

Note that the Company owns all social media accounts used on behalf of the Company or otherwise for business purposes, including any and all log-in information, passwords, and content associated with each account, such as followers and contacts. The Company owns all such information and content regardless of the employee that opens or uses the account, and will retain all such information and content regardless of separation of any employee from employment with the Company.

Employees are reminded that they must use Company's equipment primarily to perform their job-related duties and responsibilities in a manner consistent with Company's policies and business objectives. Employees' personal usage of Company's equipment should be kept to a minimum and should not create any disruption on their regular duties or activities of others. Therefore, employees are reminded that they should not have an expectation of privacy when using personal social media sites or applications from Company's equipment.

Protection of the Company's Goodwill, Brands, and Business Reputation:

Employees are personally responsible for what they communicate on social media. Employees should remember that social media activity is public and permanent, and that anything written online can be traced back to its author.

Employees should use good judgment about what they post, and should remember that anything they say can reflect on the Company, even if they do include a disclaimer. Employees should strive to be accurate in their communications about the Company, and remember that their statements have the potential to result in liability to the Company. The Company encourages employees to act with professionalism and honesty in social media and other communications.

Confidential Information:

Employees are subject to confidentiality obligations under the Company's non-disclosure agreements. Therefore, employees must treat the Company's confidential information, trade secrets, and intellectual property as confidential information, and shall refrain from disclosing it through social media or to other third parties.

In addition, employees shall not publicly disclose, discuss, endorse, or comment on the Company's (including its subsidiaries and affiliates) clients, products, partners, suppliers, current and former employees, directors, whether confidential or not, outside of the Company's authorized communications. Such information includes, but is not limited to, information about the Company, its subsidiaries, affiliates, clients, (and individuals associated with the Company's clients) or any of its employees pertaining to any individual's identity, trade secrets, proprietary data or methods, survey or market data, promotional activities, legal information (such as pertaining to a case, legal issue

or attorneys), insider information, financial information and/or strategic business plans, and any other proprietary and non-public information about the Company, its employees, or the Company's customers or vendors to which employees have access.

Employees should not provide references or recommendations for stakeholders on social or professional networking sites, as such references or recommendations can be attributed to the Company and create legal liability for employees and the Company, such as interference with prospective business contracts and allegations of wrongful termination.

Privacy:

Regardless of the medium, employees should protect the personal information of their fellow employees, Company's customers, and its business partners. Employees should refrain from disclosing personal employee and non-employee information, and sensitive personal data (with the exception of the employee's own information).

In creating user-generated content or contributing to social media/social software websites, employees should not publish personally identifiable information about colleagues or sub-contractors, without the written consent of that individual.

Protection of one's own privacy is also a consideration in posting information to social or business networking sites. The Company cares about its employees', customers' and business partners' privacy, and encourages employees to be careful to avoid publishing information that could harm reputation, encourage fraud, or lead to identity theft.

Compliance with Social Media Sites' Terms of Use:

Employees should review the terms of use of all social media sites that they visit to ensure their use complies with them. If employees are using social media as part of their job duties, employees shall review and pay particular attention to terms relating to:

- Restrictions on the use of the social media site, including restrictions on use for advertising, marketing and promotions, or other commercial purposes;
- Ownership of intellectual property used on, or information collected or generated through use of, the site (for example, any of the Company's copyrighted material and trademarks that might be posted on the site, or user information the Company collects through the site);
- Requirements for licenses or other permissions allowing use of the Company's trademarks or other intellectual property by the site owner and other third parties; and
- Privacy rights and responsibilities of the site owner and users.

Respect to Others:

In addition to complying with this Social Media Policy, the Company's Employee Handbook, and Code of Conduct, employees should not post, share, or forward content that could be considered defamatory, malicious, obscene, harassing, or threatening to any readers or viewers, including fellow employees, or the Company's clients, business partners, suppliers, or vendors.

Employees should use discretion in establishing or maintaining social media relationships with other employees that directly or indirectly report to them. Neither supervisors nor direct reports should feel pressured to accept any social media requests from anyone at the Company.

Reporting:

HQ Employees shall immediately report violations, suspected violations or submit questions regarding this policy directly to the Corporate Communications team, the Legal team or to any member of the Ethics & Compliance team. Violations or suspected violations of this policy may also be reported through Company’s Ethics Line.

No Retaliation:

As indicated in the Code of Conduct, the Company will take disciplinary action, up to and including termination, to the extent permitted by applicable law, against anyone who retaliates against any employee for reporting a possible deviation from this policy or for cooperating in an investigation.

This policy is not intended to restrict or interfere with any applicable laws, including but not limited to employees’ federal or state labor law rights, including rights of employees any whistleblower protections under federal, state, or local law, and any and all rights of U.S. employees under the U.S. National Labor Relations Act.

Last Updated:

Version	Date	Description
1	October 9th,2018	First version
2	July 29th, 2020	Second version