

Policy:	Social Media & Company	Policy Reference and Revision Number:	HR 019 Rev 000
Department:	Human Resources	Effective Date:	08/01/2021
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PURPOSE

To establish protocols for employees' use of the internet and access to social media sites on (i) Company provided equipment during work hours or (ii) when such activity may negatively impact BWC Terminals (the "**Company**").

POLICIES

1. Access to the (i) Internet and/or (ii) networking sites such as Facebook®, Twitter® or LinkedIn®; (iii) photo and video sharing sites such as You Tube® or TikTok®; (iv) blogs or micro-blogs; (v) Wikis such as Wikipedia, and (vi) all other sites where text can be posted ("**Social Media**") through Company owned mobile phones, computers, iPads, or similar equipment during working hours is intended for work-related purposes.
2. The Company will permit limited, non-repetitive use for personal matters to the extent utilized in a reasonable manner using common sense and good judgment, in accordance with applicable local, state, and federal law and does not violate then-current Company policies.

RESTRICTIONS & REQUIREMENTS

- The Company email address belongs to the Company and may not be used when entering Social Media sites unless use of the site is related to a Company related or sponsored activity of function.
- Employees identifying themselves as Company employees and/or discussing coworkers, customers, clients, vendors and/or suppliers in a work-related context, whether during working or non-working hours, are subject to Company policies and may not represent or suggest they are authorized to speak for the Company or that the Company has reviewed or approved their content. If that is not obvious from the content or context, then "**#notauthorizedspokesperson**" must be posted or state, "**The views expressed in this post are my own. They have not been reviewed or approved by BWC Terminals.**"
- Confidential or proprietary information, whether Company related or protected by a confidentiality agreement entered into by the Company, may not be disclosed in a Social Media post and compliance with copyright laws, fair use of the Company's and third-parties' copyrighted material, trademarks and other intellectual property is mandatory.
- Participation in online forums, blogs, or other electronic Social Media, other than for Company related business and activities, is limited to non-working hours. For consistency and to ensure that the Company is properly represented, employees are encouraged to reach out to Corporate Communications prior to creation of Social Media that is related to the Company.
- Employees must ensure there is adequate security protection for Social Media environments. Do not upload any software or programs that might harm the Company's systems or data.

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COMPANY MONITORING OF ACTIVITY

- Employees do not have and should not expect to have an expectation of privacy regarding their use of Company provided equipment, systems, or software.
- The Company routinely monitors the Internet, including Social Media sites, for unauthorized use of Company logos and trademarks as well as the posting of confidential or proprietary information.
- The Company will take immediate action to have unauthorized Company related sites shut down and Company privileged/private information removed.

POLICY VIOLATIONS

Conduct that adversely affects (i) the employee's job performance, the performance of fellow employees or otherwise adversely affects vendors, customers, suppliers, people who work for or on behalf of the Company or (ii) the Company's business interests or (iii) inappropriate postings that include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may result in disciplinary action up to and including termination.

NLRA DISCLAIMER

This Policy is not intended to violate the National Labor Relations Act (NLRA) or to preclude or dissuade employees' discussions or activities involving wages, hours, working conditions, or other terms and conditions of employment.