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At Schmidt, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

This policy applies to all associates who work for Schmidt.

GUIDELINES

In the rapidly expanding world of electronic communication, social media can mean many things. Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with Schmidt, as well as any other form of electronic communication.

The same principles and guidelines found in Schmidt's policies apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects members, customers, suppliers, people who work on behalf of Schmidt or Schmidt's legitimate business interests may result in disciplinary action up to and including termination.

Know and follow the rules

Carefully read these guidelines, the Schmidt Acceptable Use Policy (Computer/Internet) and Employee Handbook to ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Be respectful

Always be fair and courteous to associates, customers, members, suppliers or people who work on behalf of Schmidt. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, members, associates or suppliers, or that might constitute harassment or bullying. Examples of such 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, sex, disability, religion or any other status protected by law or company policy.

Be honest and accurate

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about Schmidt, associates, members, customers, suppliers, people working on behalf of Schmidt or competitors.

Post only appropriate and respectful content

- Maintain the confidentiality of Schmidt trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.
- Do not create a link from your blog, website or other social networking site to a Schmidt website without identifying yourself as an employee of Schmidt.
- Express only your personal opinions. Never represent yourself as a spokesperson for Schmidt. If Schmidt is a subject of the content you are creating, be clear and open about the fact that you are a Schmidt employee, and make it clear that your views do not represent those of Schmidt, fellow employees, customers, suppliers or people working on behalf of Schmidt. If you do publish a blog or post online related to the work you do or subjects associated with Schmidt, make it clear that you are not speaking on behalf of Schmidt. It is best to include a disclaimer such as, "The postings on this site are my own and do not necessarily reflect the views of Schmidt."

Using social media at work

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with Schmidt's Acceptable Use Policy (Computer/Internet). Do not use Schmidt email addresses to register on social networks, blogs or other online tools utilized for personal use.

Retaliation is prohibited

Schmidt prohibits taking negative action against any associate for reporting a possible deviation from this policy or for cooperating in an investigation. Any Schmidt employee who retaliates against another Schmidt employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

Media contacts

Associates should not speak to the media on Schmidt's behalf without contacting Schmidt's Marketing Department. All media inquiries should be directed to Schmidt's Marketing Department.