

Liberty Healthcare Corporation and Affiliates (Liberty) Standard Operating Policies

Title:	Social Media	Effective Date:	12/17/2020
Author:	Camille Tanner	Last Review Date:	06/23/2021
Location:	All Locations	Last Revision Date:	
Functional Area:	Human Resources		

POLICY

Liberty Healthcare Corporation and its Affiliates (Liberty) acknowledge that many staff members use social media tools to connect and share their life and opinions with family and friends. It has become an integral part of modern life that informs us about our world, and it gives us a platform to be heard. However, use of social media carries certain risks and responsibilities. This policy is intended to guide staff in making responsible decisions about their use of social media.

PROCEDURE

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 chat room, whether or not associated or affiliated with Liberty, as well as any other form of electronic communication. When you are posting online, your integrity is on display, so strive to be ethical, truthful, and decent.

Disclose Your Relationship to Liberty

If you talk about work related matters within your area of job responsibility, you must disclose your affiliation with Liberty.

- 1. Add Liberty Healthcare Corporation as your place of work on social media sites
- 2. Stick to your area of expertise. Only write about what you know.
- 3. If you talk about Liberty on any website or any form of social media, please use a disclaimer like this one: "The opinion expressed here is entirely my own and does not necessarily represent the views or opinions of Liberty Healthcare Corporation and its Affiliates".
- 4. If you are leaving Liberty, please remember to update your employment information on social media sites.

Protect Liberty

Keeping Liberty confidential information confidential is a keystone of our business. Many Liberty employees handle client personal information and know things about the company that could affect our business. It is essential to safeguard Liberty information, especially from the internet.

- 1. Do not post any confidential information about Liberty, staff members, and customer/patient/client information, including protected health information (PHI)/protected personal information (PPI) on any social platforms. This includes, but not limited to, trade secrets, internal reports, policies, procedures, or internal business-related confidential communications
- 2. Don't disparage Liberty or our competitors.
- 3. Anything you publish must be true and not misleading, all claims must be confirmed and approved.
- 4. When in doubt, don't post immediately. If you're unsure whether or not something related to Liberty is permissible to post, send it the marketing department for review: marketing@libertyhealth.com.

Be Responsible and Use Common Sense

When you are online, you are representing Liberty: our people, our values.

Just by identifying yourself as a Liberty employee, you are creating perceptions about your expertise and about Liberty.

- 1. You are responsible for your actions. Anything that you post that adversely affects your job performance, the performance of fellow staff members or otherwise adversely affects members, customers, suppliers, clients, people who work on behalf of Liberty and/or Liberty's legitimate business interests may result in disciplinary action up to and including termination.
- 2. Be conscious when mixing your business and personal lives. Liberty respects the free speech rights of all employees, but you must remember that customers, colleagues, and superiors often have access to the online content you post. Keep this in mind when publishing information that can be seen by more than friends and family and know that information can be forwarded on. Be aware that taking public positions online that are counter to Liberty's interest might cause conflict.
- 3. Act responsibly and ethically. When participating in online communities, do not misrepresent yourself.
- 4. Don't post comments about an employee, coworker, customer/client/patient, or vendor that could be perceived as harassing, threating, retaliatory, or discriminatory.
- 5. You may be legally responsible for the content you post, so respect brands, trademarks, and copyrights.
- 6. Do not claim authorship of something that is not yours. If you are using someone else's content, make certain that they are credited for it in your post and that they approve of you utilizing their content.
- 7. Follow terms and conditions for social networking sites.
- 8. Your local posts can have national, and even global, significance. Your post can go viral and be seen by millions of people who don't recognize Liberty and our services.
- 9. The internet is permanent. Once information is published online, it is essentially part of a permanent record, even if you "remove/delete" it later or attempt to make it anonymous.
- 10. If you make a mistake, it's okay. Tell your supervisor and admit it immediately. Apologize online if you need to. Be upfront and correct the error as soon as possible.

Respect Liberty and Sharing Rights

We want you to engage in online activities with Liberty. When you share your content with us, we can share our culture with the world.

- 1. Be responsible to your work. Liberty understands the value of social media to our digital marketing strategy and employee engagement and we encourage you to use social media on your breaks or when it does not interfere with your work. Liberty encourages all associates to exercise sound judgement and common sense to prevent online social media sites from becoming a distraction at work.
- 2. Don't use your work email: @libertyhealth.com to sign up for social media sites. Remember, your work email isn't private, and Liberty can see your emails. If you're not signing up for something professional, use a personal email.
- 3. Videos, photos, and other forms of media voluntarily shared with Liberty become property of Liberty and may be posted online by the company brand pages and website. Liberty reserves the right to use your first and last name, job title, program, location, and job description to said content.

Other Policies

- 1. Media Inquiry Protocol
- 2. Electronic Communications
- 3. Professional and Personal Boundaries
- 4. Investigating Sexual Harassment; Sexual Harassment
- 5. HIPAA Privacy and Security Plan and Index
- 6. Index Corporate Compliance Policies

Liberty prohibits taking negative action against any staff member for reporting a possible deviation from this policy or for cooperating in an investigation. Any staff member who retaliates against another staff member 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.
Approved By:

Revision History

Version	Date	Author	Summary of Changes	
#1	12/17/2020	Camille Tanner	Policy Created	
#2	06/23/2021	Camille Tanner	Policy reviewed; no changes	