



SOCIAL MEDIA POLICY

PURPOSE

Social media communications must align with the LADD Mission, Vision and Values. The LADD Social Media Policy establishes guidelines for employees to conduct social media engagement in both official and unofficial capacities, promotes a safe environment for sharing information and protection from violation of applicable regulations or laws.

SCOPE

This policy applies to all LADD employees.

POLICY

It is the policy of LADD to establish a framework for employees to make responsible decisions about their use of social media to meet job responsibilities and LADD business interests are not negatively affected.

STANDARDS AND DEFINITIONS

Social Media – includes but is not limited to, all means of communicating or posting information or content of any sort on the Internet, including the following forums: blogs, podcasts, discussion boards, on-line collaborative information and publishing systems that are accessible to internal and external audiences (i.e., wikis), RSS feeds, video sharing, personal websites, and social networks such as but not limited to Facebook, Twitter, Snapchat, Instagram, TikTok, YouTube, as well as all other social media forms.

LADD recognizes the use of various online communities and the need to outline the expectations and responsibilities of employees' use of social media networks and internet-based communications. Such communications may include, but are not limited to accessing, using, posting, publishing, or monitoring online sites, forums, blogs, wikis, or video logs (e.g., Facebook, Twitter, Instagram, LinkedIn, TikTok, YouTube, blogs, media sites and other similar online venues). The purpose of this policy is not to restrict an employee's protected activities under Section 7 of the National Labor Relations Act. It is to follow and uphold LADD's MVV.

LADD fully respects the legal rights of our employees, including their rights under the National Labor Relations Board to engage in concerted and protected activities. If at any point this policy or parts thereof are determined to interfere with the legal rights of employees, then the rights of the employee will take precedence over the policy.

PROCEDURE:

1. While it is each individual's decision whether to use social media networks, employees should always be aware that their behavior and opinions may reflect on LADD.
2. Social media networking and internet-based communications by employees should be consistent with applicable laws and LADD policy.
3. **Employees shall not publish, discuss, or reference confidential information about any person receiving services, including health information or information otherwise protected by HIPAA. This includes a person's name, photographs, videos taken within their home, diagnostic testing results and images, case information, or any other information that may lead a reasonable person to identify a person supported.**
4. Employee communications on social media networks or online communications should not contain information that identifies a person served's identity or condition.
5. Employees shall respect the privacy rights of other employees, person's supported, contract agency and people in the community of LADD by refraining from writing about or sharing information that may be considered a breach of privacy or confidentiality. Employees shall not publish, post, or discuss other people's personal information.
6. Employees have a right to their personal privacy. They have the right to keep their personal opinions, beliefs,

thoughts, and emotions private. Employees are prohibited from sharing anything via social media channels that could violate another employee's right to personal privacy.

7. Employee communications must not contain LADD confidential, proprietary or trade secret information. This includes information about trademarks, sales, financial information, salaries, person supported information and data, LADD strategy and financial information, information provided to LADD by third parties, or any other information that has not been publicly released by LADD. These examples are provided for illustration purposes only and do not encompass the full range of information that may be considered confidential and proprietary. Employees should refrain from using LADD's name/, logo, or trademarks when using social media networks or online communications.
8. Each individual employee, professional, volunteer or other associate of LADD or its affiliates is personally responsible for his or her content on social media networks and other online communications.
9. Any communications should reflect an individual's personal point of view only and must not be presented as the viewpoint of LADD.
10. Employees shall not represent, claim or imply that they are speaking for, or representing LADD. The content should make it clear that such communications are the individual's personal opinions and do not reflect the opinion of LADD or its affiliated entities.
11. If employees, professionals, volunteers or other individuals associated with LADD acknowledge their relationship with LADD in an online community, they shall include disclaimers in their online communications advising that they are not speaking officially on behalf of LADD.
12. Employees are solely responsible and liable for the content they post or publish, and LADD shall not be liable for any errors, omissions, losses, or damages claimed or incurred due to any content posted or published by an employee. We encourage employees to use the LADD Mission, Vision, and Values as a guide for their actions and words.
13. Employees are reminded that content or information posted and published remains available for indefinite periods of time.
14. Before posting or publishing, content should be considered carefully, and caution should be exercised. Employees should exercise good judgment and strive to be accurate, fair, and responsible when using social media networks and should be respectful and professional to fellow employees, supervisors, and LADD. Following the LADD Mission, Vision, and Values will help you to communicate in a positive, open, and effective manner.
15. Employees and others associated with LADD may not post or publish disparaging material that is libelous, slanderous, or defamatory, which identifies LADD, administrators, managers, supervisors, employees, or people supported/families, which is false, and damages their reputation.
16. Employees need to be aware of their relationship to LADD in all social media disclosures. Nothing and garners more attention on social media channels than honesty or dishonesty. Employees who have a vested interest in something they are discussing should acknowledge that relationship and point it out, so long as they can do so without forfeiting their legal rights to engage in concerted or protected activities related to their employment.
17. Employees are encouraged to use LADD's numerous options for employees to ask questions, make comments/give feedback, and suggestions for improvements in the most efficient and effective manner via Corporate Compliance, Quality Assurance, and/or contacting members of Management directly instead of posting information via electronic communications. Solutions to employment problems can be addressed using LADD options, whereas electronic postings offer no solutions.
18. Employees shall not access, use, post, publish, or monitor any social media network or online communication forum while at work at LADD, whether through personal communications devices, such as laptops, cell phones, smart phones, PDAs, or other similar devices, or while on LADD computers or tablets, unless expressly authorized to do so for LADD purposes.
19. Employees shall not download, install, or use social media network software on LADD computers or tablets. This includes the use of AI software.
20. Employees are responsible for understanding and being aware of the LADD policy on Harassment and Violence at the workplace found in the Handbook Code of Conduct and LADD Directory, and how those policies affect an employee's use of social media.

21. Employees may be disciplined, up to and including termination, for communications, commentary, or images that violate this policy.
22. Social media tools are becoming increasingly important in local and incidental crisis and emergency management communications. Nevertheless, even in times of crisis, disaster, or emergency, only employees with the authority to speak on behalf of LADD are permitted to do so.
23. LADD reserves the right to monitor, restrict, block, suspend, terminate, delete, or discontinue access to any work-related social media network sites without notice and at its sole discretion.
24. Suspected violations of this policy can be reported to the Corporate Compliance Officer via the anonymous hotline, by email to corporatecompliance@laddinc.net, or by submitting a Confidential Complaint.

