

## Social Media and Confidentiality Policy

*(Excerpt from the Pace Analytical® Employee Handbook; Revision 12, May 3, 2018)*

It is critical that social media tools be used in a responsible manner. As with e-mail and other electronic means of communication, the use of social media applications to communicate and engage with the public must be in accordance with all the applicable policies as stated in the Pace Analytical® Information Technology Policy.

The following principles should be employed when using public-facing social media services in an official capacity within Pace Analytical®.

- Do not discuss any company related information that is not considered public information (as addressed in the Pace *Standards of Conduct and Code of Ethics*). The discussion of sensitive, proprietary, or classified information is strictly prohibited. This rule applies even in circumstances where password or other privacy controls are implemented. Failure to comply may result in disciplinary action, including suspension without pay or termination of employment.
- Third-party social media Websites should never be the only place in which the public can view Pace Analytical® company information. Any information posted to a third-party social media Website must also be provided in another publicly available format such as the company Website.
- If you have been approved to represent Pace Analytical® in an official capacity, Pace Analytical® is responsible for the content you publish on blogs, wikis, social networking Websites, or other forms of social media. Assume that any content you post may be considered in the public domain, will be available for a long period of time, and can be published or discussed in the media.
- Know and follow the Pace Analytical® *Information Technology Policy* and the *Standards of Conduct and Code of Ethics*. Do not engage in vulgar or abusive language, personal attacks of any kind, or offensive terms targeting individuals, groups, or companies.

The following principles should be employed when using public-facing social media services in a Non-official (non-business or personal) use of social media and social networking:

- Pace Analytical® recognizes that these types of tools can sometimes blur the line between professional and personal lives and interactions. Therefore, employees are reminded that, as representatives of Pace Analytical®, the above rules and guidelines must be taken into consideration when participating in these services at any time, but particularly when identifying themselves as employees of Pace Analytical® or when context might lead to that conclusion. Any activity using Pace Analytical® equipment (including access to the Internet, PCs, Pace paid smart/cell phone) is administered by the Pace Analytical® Information Technology Policy on the personal use of Pace Analytical® equipment.
- By exercising discretion and common sense when employing social media for professional or personal purposes, you will help assure that their great potential is fully realized without inadvertently compromising our professional, legal, or ethical standards.
- Employees should remember that the *Standards of Conduct and Code of Ethics* policy and the *Information Technology Policy* are applicable.

- Be aware of your Pace Analytical<sup>®</sup> association in online social networks. If you identify yourself as a Pace Analytical<sup>®</sup> employee or have a public facing position for which your Pace Analytical<sup>®</sup> association is known to the general public, ensure your profile and related content (even if it is of a personal and not an official nature) is consistent with how you wish to present yourself as a Pace Analytical<sup>®</sup> professional, appropriate with the public trust associated with your position, and conform to existing standards, such as Standards of Conduct/Code of Ethics. Employees should have no expectation of privacy when using social media tools.
- When in doubt, stop. Don't post until you're free of doubt.
- In a publicly accessible forum, do not discuss any Pace Analytical<sup>®</sup> related information that is not already considered public information. The discussion of sensitive, proprietary, or classified information is strictly prohibited. This rule applies even in circumstances where password or other privacy controls are implemented. Failure to comply may result in fines and/or disciplinary action.