

## **Online Social Media Policy**

### **I. PURPOSE**

To ensure that Citizens Energy Group ("Citizens") personnel participate in social media in a way that is both lawful and protective of the confidentiality and trust of Citizens customers and its reputation. Social media activities are allowed using Citizens internal network only in accordance with these Guidelines and any related Citizens policies. These Guidelines apply to any use of social media by any Citizens personnel.

### **II. SCOPE**

This applies to all full-time & part-time "Citizens Personnel."

### **III. DEFINITIONS**

"**Social media**" means any form of electronic or Internet-based communication, publication or presence that allows users to share video, audio, text or multi-media or engage in conversation. Examples of social media include sites such as Twitter, Facebook, YouTube, LinkedIn, Instagram, Pinterest, MySpace and similar sites, as well as blogs, wikis, podcasts, virtual worlds and message boards/forums.

"**Citizens personnel**" means all directors, trustees, officers, employees, interns, temporary employees and service providers (when acting in their capacity as service providers) of Citizens Energy Group, its affiliates and subsidiaries.

### **IV. POLICY**

It is the policy of Citizens to fully respect the rights of all "Citizens Personnel" to engage in social media. In general, "Citizens Personnel" may freely engage in social media on their own time. However, use of social media in or outside of work that affects your job performance, the performance of others, or Citizens' business interests are a proper focus for company policy. Therefore, Citizens has created this Social Media Policy to guide "Citizens Personnel" with respect to social media use on the job, or as it relates to Citizens and their employment with the company. The same work rules that govern the conduct and acts of employees in general, as found in the "Work Rules for the Employees" booklet, apply to "Citizens Personnel" activities in social media channels and any other form of online publishing.

### **V. PROCEDURE**

Every day, the topic of our business can be found on social media. People often also discuss and debate how our services affect their lives. In the process, Citizens is sometimes referenced. We recognize the importance of participating in these online conversations and are committed to ensuring that we contribute to online social media in the right manner. This policy has been developed to help: (a) Citizens personnel avoid the pitfalls of online communication, whether from work or home; and (b) authorized personnel (such as designated spokespersons) participate in these conversations while meeting Citizens guidelines, protecting our brand, and reflecting our vision.

We encourage personnel to explore and engage in social media communities at a level at which they feel comfortable. Before engaging in social media, either personally or professionally, review and understand Citizens policies for **Information Systems Acceptable Use Procedure, Citizens Code of**

**Conduct** and the **Media Response Policy** included at the end of this document.

Keep in mind: *The same rules that apply to our communications in traditional media still apply in the online social media space.* This is public information and requires adherence to the above policies. Unless you are a designated spokesperson, you are not empowered to speak on behalf of the Citizens in any medium.

**Do's:**

1. **Adhere to the Citizens Code of Conduct and other applicable policies.** All Citizens Energy Group personnel are subject to Citizens Code of Conduct in every public setting, including your personal activities online, as well as other applicable Citizens policies.
2. **Own your own accounts.** You may own, license, and operate personal accounts, blogs, web pages and related social media content that do not carry Citizens brand identity. However, you are not permitted to use Citizens name, logos, slogans and related brand identifiers unless you have Citizens prior, express, written consent. You are responsible for your online activities and all activities under accounts you own and/or operate.
3. **Keep Citizens Vision, Mission, and Values in mind at all times.** Citizens does not intend to interfere with your private life, but publicly observable communications, actions, or words are not private. As you know, Citizens Vision is to fulfill the promise of the Trust to serve our customers and communities with unparalleled excellence and integrity. All Citizens personnel must use good judgment and discretion to ensure your use of social media is consistent with Citizens Vision, Mission, and Values. Even if you think a particular social media interaction is private, bear in mind that what you think is private may one day become public. Therefore, you should ensure both your "private" and public social media interactions do not contradict your role at Citizens and are reflective of Citizens Mission, Vision, and Values.
4. **Be honest about who you are.** Everything written on the internet can be traced back to its author. Write as if everyone knows you and always be honest about who you are. Please note that these Guidelines apply even if your communication is intended to be anonymous or under a pseudonym.
5. **Make it clear that the views expressed are yours.** Make it clear that any content published through social media is representative of your own opinions and not the views and/or opinions of Citizens. If the conversation relates to our services or industries, you should identify yourself as working for Citizens in the context of your post/comment/other content and be clear about your role with Citizens. You should not use your Citizens email address for your social media activities. Your postings must be free of any impression that Citizens has authorized such posting or that the views expressed are anything more than your personal opinion. For example, if you disclose your affiliation with Citizens, we recommend that you include a disclaimer similar to the following somewhere in every social media profile you maintain: "The postings on this site are my own and do not necessarily reflect the views of Citizens Energy Group."
6. **Be conscious when mixing your business and personal lives.** The Internet is public. Online, your personal and business personas may intersect. Citizens respects the rights of its employees, but remember that customers, other stakeholders, colleagues and supervisors often have access to the online content you post. Keep this in mind when publishing information online even when you think it can be seen only by friends and family.
7. **Be careful, considerate, and accurate. 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. Search engines and other technologies make it virtually impossible to take something back. You should treat everything you post online as a lifetime, public record

that reflects upon you. If you make a mistake, admit it, apologize if appropriate, and make the correction quickly and clearly.

8. **Know the rules.** Become familiar with the terms of service and policies of the social media sites and networks in which you participate. Pay attention to updates to such policies, including privacy settings.

**Don'ts:**

9. **Do not disclose non-public information of Citizens or others.** Respect confidentiality. Do not discuss with or disclose to anyone information of any kind on social media about: (a) Citizens confidential information (for example, proprietary product or process information; material, non-public financial or business information; business strategies; and the like); (b) Citizens personnel's confidential information (for example, health information; Social Security numbers; and the like); or (c) non-public information regarding Citizens customers, vendors or suppliers (for example, non-public financial information; business plans; contact information; pricing; and the like). Keep any topics related to Citizens focused on matters of public information or our utility industries.
10. **Do not violate the intellectual property rights of Citizens or others.** Do not use the trademarks, logos, brands or other intellectual property or proprietary information of Citizens, its affiliates or subsidiaries, or any third parties in violation of the owner's rights. Remember NEVER to disclose non-public information of Citizens (including confidential information). Do not post internal reports, policies, procedures or other internal business-related confidential communications.
11. **Do not disparage our customers, stakeholders, competitors or Citizens.** Be respectful! You are prohibited from communications that are maliciously false about the Citizens, its past and present directors, trustees, officers, management, employees, vendors, customers, competitors or business partners either by name or by implication. Avoid posting materials or comments that may be seen as offensive, demeaning, defamatory, harassing, threatening, abusive, or otherwise inappropriate. Respectfully withdraw from discussions that head in one of those directions. Acknowledge differences of opinion politely.
12. **Do not respond to negative comments or conversations about Citizens.** An official response may be needed. You may see third parties trying to spark negative conversations about Citizens or our industries. Resist the temptation to react on behalf of Citizens. Pass the information along to the Manager, eCommerce, who will consider whether and how to address such comments.
13. **Do not portray yourself as a spokesperson, unless you are designated as one.** You speak for yourself. Unless you have been authorized, you cannot speak on behalf of Citizens. Be careful not to portray yourself as a spokesperson on issues relating to Citizens. Follow Citizens Media Response Policy.

**Guidelines for Authorized Spokespersons of Citizens:**

In addition to the Guidelines noted above, authorized spokespersons for Citizens must adhere to the additional following guidelines:

1. **Ownership by Citizens.** All social media accounts, blogs, web pages and related content carrying Citizens brand identity are and will be owned and licensed by Citizens, as appropriate. All log-in information, passwords and content related to such social media and Internet platforms (such as followers and contacts) are the sole and exclusive property of Citizens, regardless of the Citizens personnel who opens such account or uses it. A copy of all such information must be provided to the Manager, eCommerce and updated on a regular basis. In exchange for being given access to Citizens social media accounts and passwords, upon termination of their relationship with Citizens, personnel with such access agree to refrain from accessing such accounts and agree to return immediately all passwords.

2. **Add value - Contribute thoughts and ideas.** There are millions of voices on the Internet. The way to get yours heard is to contribute thoughts and ideas that people will value. Social media content from Citizens should help people understand the issues and our solutions. It should be thought-provoking and community-building. Write about what you know. If your content improves knowledge, solves problems or helps people understand Citizens better, then it is adding value.
3. **Keep it conversational.** When contributing to social media on behalf of Citizens, you should write like you would talk to real people in a professional situation. Avoid overly-scripted language and keep a more conversational tone. Use content that encourages comments and answers questions.
4. **Create some excitement.** Citizens is making important contributions to the community and to public dialogue. Do your part to share with our community and the world the exciting things we're doing and be open to opportunities to learn from others.
5. **Use Citizens intellectual property properly.** The following rules should be followed when using Citizens trademarks, slogans and logos:
  - a. Language - A mark is a proper adjective and must be used to modify a noun, at least the first time it appears in a label or advertising. Using it with its generic name will also help prevent it from becoming a generic name itself. As a general rule, do not use any marks as a noun or verb.  
Correct – Always use a KLEENEX tissue.  
Incorrect – Always use a KLEENEX.
  - b. No Possessive or Plural Forms - As an adjective, a mark should not be used in the possessive or plural form.  
Correct – RAY-BAN sunglasses are the best.  
Incorrect – RAY-BANS are the best.
  - c. Stand Out - A mark should be distinct from other text, images or materials. This can be achieved by capitalizing one or more letters of the mark. It can be in a type style that makes it stand out from the rest of the text, for example, in italics or bold face type, or by underlining the mark.
  - d. Consistency - A mark should not be altered, edited or modified.
  - e. Proper Notice – You should give proper notice of CEG's rights in its marks. Notice can be given in two ways: (1) footnotes; or (2) the appropriate symbol. In general, the ™ symbol is recognized as identifying an unregistered trademark. The SM symbol is used to identify an unregistered service mark. The ® symbol is used to identify registered marks in the US and most other countries.
6. **Monitor comments.** Most social media accounts welcome comments – it builds credibility and community. However, Citizens accounts should be set so that you can review and approve comments before they appear. This allows you to respond timely to comments, delete spam and block any individuals who repeatedly post offensive or frivolous comments.
7. **Never comment on legal matters.** Avoid participating in any discussion related to legal matters, litigation or any parties with whom Citizens may be in a lawsuit or other dispute.

Please remember that the Citizens may monitor blogs, social networking sites or other electronic media to ensure that Citizens personnel are adhering to all policies. Further, Citizens reserves the right to monitor, intercept and review, without further notice, all Citizens personnel activities using Citizens network, resources, or communication systems, including, but not limited to, social media postings and activities. You consent to such monitoring by your acknowledgement of this policy and your use of such resources and systems.

Violations of these Guidelines may result in disciplinary action up to and including termination. If you have any questions about these Guidelines, please do not hesitate to contact your manager or the eCommerce manager within Corporate Affairs.

NOTE: These Guidelines do not prohibit legally-protected speech and conduct.

**Links to relevant policies:**

- Information Technology Acceptable Use Policy  
[Policy Release 2021](#)
- Citizens Code of Conduct  
[Code of Conduct](#)
- Media Response Policy  
[Citizens Energy Group Media Response Policy](#)

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Reference other policies