



North American Lighting, Inc.

A **Koito** Group Company

Social Media

Policy Number: PER-096

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At North American Lighting, Inc. (“NAL”), 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, the use of social media also presents certain risks and carries 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.

PURPOSE: By identifying oneself as an employee of NAL on a Social Media profile, a Team Member becomes, to some extent, a representative of NAL and everything that he or she posts has the potential to reflect on NAL and its image.

The NAL Social Media Policy was created in order to protect NAL’s reputation, facilitate compliance with applicable laws and regulations, and empower Team Members to be advocates of the company. Our goal is to provide Team Members with parameters to protect themselves and NAL when engaging on social media.

GUIDELINES:

While much of what Team Members do on social media is considered entertainment in their free time, there are specific instances where Team Members need to avoid violating this policy where social media activity can have a negative impact on NAL. Those include:

1. Acting as a spokesperson:

If you identify yourself as an NAL Team Member on your social media profile, please be clear that the views and opinions you have expressed on social media are your own. To avoid any confusion, Team Members could choose to only identify themselves as a NAL Team Member on professional networking sites (such as LinkedIn) and remove references to NAL from their personal sites (such as Facebook, Instagram, and Twitter). Team Members should not speak to the media on NAL’s behalf without contacting the Corporate GM of HR. All media inquiries should be directed to the Corporate GM of HR. If you think an official NAL response may be required for something you see on social media, contact the Corporate GM of HR. Content that is shared through NAL’s





social media platforms has been reviewed by the appropriate internal parties and is appropriate for Team Members to share.

2. **Violating confidentiality:**

Information published by Team Member on Social Media should comply with NAL's confidentiality and disclosure of proprietary data policies. You should never reveal non-public company information on social media. Treat all confidential information and trade secrets of NAL, its partners and suppliers, as ***strictly confidential***. Confidential information can include, but is not limited to, information about trademarks, upcoming product releases, sales, finances, number of products sold, number of Team Members, strategy, processes, and any other information that has not been publicly released by NAL. It is important to recognize that just because we may be very familiar with a project or platform, doesn't mean that the information isn't highly confidential or protected by agreements with our business partners. If you want to share information about NAL or our projects be sure to have clearance from your supervisor or manager before sharing.

3. **Unauthorized use of video and photography:**

Video or photography on the production floor may only be performed by authorized individuals due to the nature and presence of confidential property. When taking photos in NAL locations, even if photography is permitted in your workspace, it remains important to be careful not to disclose competitively significant or other confidential information. For example, if you are posting photos, ensure that images or words in the background do not unintentionally reveal NAL Confidential Information (for example, a team photo with a visible launch calendar in the background). Keep in mind that NAL's Corporate GM of HR and NAL's Compliance Committee are available to assist with any questions. If you are unsure whether the information in your post or picture violates this policy, **err on the side of caution and ask the Corporate GM of HR or Compliance Team.**

4. **Creating unauthorized social media accounts and groups:**

You should not create social channels, communities, hubs or other social media groups that represent or are branded as NAL or any of its brands, products, or affiliates without approval from the Corporate GM of HR.

5. **Harming the goodwill or reputation of NAL:**

Keep in mind that your posts can potentially tarnish reputations or infringe on the rights of someone else. Do not post information or rumors that you suspect or know to be false about NAL or any content that could tarnish the reputation or goodwill of the company.





6. **Harassing/disrespectful conduct:**

Speak respectfully about NAL and its current, former and potential Team Members, customers, partners and competitors. Offensive or inappropriate remarks are as out-of-place online as they are offline. Some disrespectful conduct can easily crossover into actionable harassment. Use the same set of standards as you do in the physical workplace. A good litmus test before posting something or sharing social media content is to ask yourself, “would I say or send this directly to our COO?” If the answer is no, **err on the side of caution.**

CORRECTIVE ACTION: Team Members should recognize that they are legally liable for anything that they write or present online. Team Members can be disciplined for commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, threatening, or that can create a hostile work environment. NAL will administer the Corrective Action Policy (PER-011) when Team Members violate this policy.

NAL reserves the right to ask a Team Member to remove a post or blog if it is deemed that it violates this policy. Refusal to remove a post may subject the Team Member to corrective action up to and including termination.

Team Members should be aware that even though some activities are away from work, employment rules regarding standard conduct including harassment and hostile work environment still apply and are subject to corrective action. NAL’s policies prohibit retaliation against any Team Member for reporting a possible violation of this policy or for cooperating in an investigation. Any Team Member who retaliates against another for reporting a possible violation of this policy or for cooperating in an investigation will be subject to corrective action, up to and including termination.

If you are an NAL Team Member, member of a NAL subsidiary or NAL Representative (consultants, agents, sales representatives, independent contractors, and contract workers), it is your responsibility to be familiar with this Policy in its entirety, as well as any regional addendums associated with your location.

