

Social Media Policy

BRG’s Social Media Policy establishes guidelines for appropriate use of social media to assist employees in communicating responsibly and to minimize business and legal risks. This policy applies to all social media activity by employees of BRG and its subsidiaries on platforms including, but not limited to, LinkedIn, Facebook, X, Instagram, Reddit, and Pinterest.

Separate from and further to BRG’s [Social Media Guidelines](#), BRG’s policy is intended to address data privacy, security, and other risks onto BRG’s network. Personal and business use of certain social media is prohibited by the terms of certain BRG client engagements. Use of social media may also present certain risks to BRG’s reputation, as well as the potential for the data and other security risks identified above. Use of social media can expose BRG to discrimination/harassment, privacy, and breach of confidentiality claims; and can jeopardize the firm’s compliance with certain rules, laws, and client obligations. Adherence with BRG’s Social Media Policy is a term of employment.

NONPERMISSIBLE SOCIAL MEDIA CHANNELS

TikTok

The TikTok app cannot be installed, nor the website accessed, from any device that is used to send or receive BRG mail or otherwise conduct BRG business or to access BRG’s network. TikTok presents data security and data privacy risks and vulnerabilities. Additionally, BRG has client contracts that require BRG to represent and warrant that TikTok is not used or downloaded on information technology equipment used in connection with the services.

GUIDELINES FOR USING SOCIAL MEDIA PLATFORMS

- **Be responsible for what you post.** You are personally responsible for your online activity, including that which is conducted with a firm email address or can be traced back to the firm’s domain, list your BRG affiliation, and/or use firm assets. Your BRG affiliation and the thinkbrg.com URL attached to your name may imply to others that you are acting, or expressing an opinion, on behalf of BRG. Material that you publish on your personal online sites or social media forums should not be attributed to the firm and should not appear to originate from or be endorsed by BRG.
- We recognize that LinkedIn, as a professional network-focused social media platform, is used for a combination of personal and professional activity. Should you wish to publish content related to BRG on your LinkedIn account, content relating to or created within BRG should be specifically identified and tagged to BRG to clearly delineate BRG content versus personal views.
- You cannot use BRG-owned equipment—including computers, BRG-licensed software, other electronic equipment, facilities, or BRG time—to conduct personal blogging or personal social networking activities. You are also prohibited from posting on personal blogs or other sites the trademark or logo of BRG or any business with a connection to BRG. However, when you publish articles that do reference your BRG affiliation, you must include the following disclaimer: *The views and opinions expressed in this article are those of the author and do not necessarily reflect the opinions, position, or policy of Berkeley Research Group, LLC or its other employees and affiliates.* You should also make it clear that you are speaking for yourself and not BRG.

- **Protect client and BRG confidential information.** The obligations of confidentiality that we have to the firm and our clients are applicable in all social media settings. Do not disclose business or client confidential information. Never use a firm client's name in a social media post unless you have written permission to do so from BRG Legal, your community leader(s), and the client. Sharing this type of information, even unintentionally, can result in legal action against you, the firm, or the client. Avoid forums where there is little control over what you know to be confidential information. For example, in the world of social networking, there can be a breach of confidentiality when someone posts a comment congratulating an attorney on representation of a specific client or on a specific case, improperly disclosing a matter on which BRG has worked. Further, all use of client and BRG confidential information is subject to [BRG's Confidential Information policy](#) related to protecting proprietary and confidential information (see p. 19 of Code of Conduct).
- **You have a right to privacy and free speech.** The firm is entitled to review all material posted or sent using BRG computer equipment or the BRG network. Again, your opinions are your own and not those of anyone else at BRG. Similarly, you are, of course, free to participate in civic and political activities if such activities are on your own time and at your own expense. You may not suggest or imply that your donation of time, resources, or money is from or endorsed by BRG. You may not give political contributions on behalf of BRG or use corporate funds (including business development funds), and we will not reimburse you for a political or campaign contribution.
- **Obey the law and BRG policies.** The rules and guidelines in the BRG employee handbook and other policies (in particular the Harassment-Free Work Environment policy set forth in BRG's Code of Conduct and chapter nine in BRG's Employee Handbook, "Communications Systems") apply to employee behavior within social networks and other public online spaces. Do not post information or conduct online activities that might violate applicable local, state, or federal laws, regulations, or BRG internal policies. Identify all copyrighted or borrowed material with citations and links. Additionally, BRG employees must maintain complete accuracy in their online biographies and CVs, including on social media profiles that reference your BRG affiliation. This includes adhering to approved titles (e.g., using "leader" of a practice without having written permission from BRG management). This also includes amending all online and offline profiles to reflect your last day of employment at BRG, if applicable.
- **Fact-check your posts.** Before you hit the send or post button, evaluate your contribution's accuracy and truthfulness. When publishing material online that includes direct or paraphrased quotes, thoughts, ideas, photos, or videos, you should give credit to the original material or author, where applicable. You also should check your post for spelling and grammar, since your reputation in the electronic community is directly affected by how you present yourself online. Please refer to the firm's [Acceptable Use of Artificial Intelligence \(AI\) and Machine Learning \(ML\) Tools Policy](#) in relation to the use of AI to generate social media posts and other content. It is essential that all content—including that created in whole or part through generative AI—is subject to the same human fact, accuracy, quality, and sensitivity checks.
- **Be respectful.** When posting to a blog or social media site, your views on politics, sex, religion, or any other topic are your own. Keep the tone of your comments respectful and ensure that it is clear you are speaking for yourself and not for BRG. Avoid personal attacks, online "fights," and hostile communications. Social media should not be used as a weapon or to bully or dox someone with whom you disagree. Reread your post or message, and if you are not sure if it is appropriate, it probably isn't, so reconsider posting it.
- **Prohibited posts.** Conduct in violation of BRG policies or that is otherwise abusive, illegal, threatening, violent, defamatory, or obscene is prohibited, as is doxing and the posting of any other sensitive, confidential, or private information about any client, individual, or other third party.
- **Responding to an inaccurate post.** If a commentator to your online social media page posts an inaccurate comment about the firm, its employees, or firm clients, contact BRG Legal before responding.
- **Do not rely on social channels for client communications.** In general, it's best to work with clients in person or over the phone when making decisions that affect business, followed by an email to confirm. Social media is a great way to stay in touch, but it's too fleeting to replace more professional channels.
- **Only engage with professional profiles.** Before you connect with prospects, clients, or colleagues on social media, make sure they're using that channel for professional purposes. If something looks like a private account made for personal use, give the person space and check before connecting.

- **Posting recommendations.** It is not the firm's policy to provide recommendations to former employees, vendors, or clients, but on an individual basis you may recommend colleagues or business associates as a tool of professional social networking sites. However, the recommendations and comments you post about others can have consequences, even if you make the recommendations personally and not on behalf of the firm. For example, if you endorse an individual as an expert, it may become problematic if that individual becomes an expert on a matter where you are adverse and your "endorsement" is used to bolster the expert's credentials. If you have a question as to whether a recommendation or comment is appropriate about someone you have or had a business relationship with, or about anyone who is or has been associated with the firm, contact BRG Legal.
- **Responding to press or other outside inquiries.** Only authorized employees may make public statements on behalf of BRG. If you are asked questions, either directly or through another person, do not attempt to answer them unless you are certain that you are authorized to do so and have the necessary facts. BRG has designated spokespeople to address information requests. Media inquiries should be referred directly to the Vice President of Marketing. Requests from outside attorneys or government representatives for information about any BRG employee, officer, or director, including requests for interviews, should be directed to BRG Legal.

POLICY VIOLATIONS

- **Reporting Violations.** BRG requests and strongly urges employees to report any violations or possible or perceived violations of this Social Media Policy to a manager, BRG Human Resources, or BRG Legal. Violations of this policy include, but are not limited to, public disclosure of confidential or sensitive information concerning BRG, its employees, and/or clients; discussion of proprietary information; and unlawful, harassing, or discriminatory activity related to blogging or social media/networking.
- **Discipline for Violations.** BRG investigates and responds to all reports of violations of this Social Media Policy and other related policies. Violation of this policy may result in disciplinary action up to and/or including immediate termination. Discipline or termination will be determined based on the nature and factors of any blog or social networking post. BRG reserves the right to take legal action where necessary against employees who engage in prohibited or unlawful conduct.

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