



1. **Purpose.** This Policy establishes requirements and procedures for communications through any medium with Supervisory Bodies (as defined below), news media, publications, and Social Media.
2. **Effective Date.** December 2020.
3. **Audience.** All Destination Pet personnel.
4. **Policy.**

4.1 **Application.** This Policy applies to all communications by Destination Pet and its employees to (a) Supervisory Bodies, (b) news media inquiries, (c) publications, and (d) communications using social media and other types of interactive electronic, digital or online services, such as Facebook, Twitter, Reddit, LinkedIn, message boards, blogs, wikis and other similar services, as well as posting on personal or others' blogs, in chat rooms, or on various websites ("**Social Media**").

4.2 **Supervisory Bodies.**

4.2.1 **Generally.** Government and law enforcement agencies and other regulatory or supervisory bodies or agencies, or similar authorities ("**Supervisory Bodies**") may make inquiries and requests of Destination Pet, including random or targeted visits or calls. The inquiries may be made directly by the Supervisory Body or by third parties acting on the behalf of the Supervisory Body.

4.2.2 **Confirmation of Inquiry by Supervisory Body.** To ensure that inquiries and requests for information that purport to be from a Supervisory Body are legitimate and that an appropriate and timely response is provided, all communication with Supervisory Bodies must be conducted by the Compliance Manager or Destination Pet's legal team, except in an emergency situation where life or property is potentially in danger. The legal team will check with the Supervisory Body to confirm that the inquiry was legitimate.

4.2.3 **Coordination with Compliance Manager and Legal team.** If a Destination Pet employee is contacted by a member of any Supervisory Body, the employee should notify the Compliance Manager or the legal team as soon as possible and, in any event, prior to responding (except in an emergency situation where life or property is potentially in danger). If the contact is by telephone or in person, the employee should explain to the person that the employee is not authorized to provide any information to the person until Destination Pet has verified the inquirer's identity.

4.3 **Media Inquiries and Publications.**

4.3.1 **Media Inquiries and Coordination with the Director of Strategy and Business Operations.** To maintain consistency of Destination Pet's brand, the only person at Destination Pet authorized to speak to the media and publications on behalf of Destination Pet, on a day-to-day basis, is the Director of Strategy and Business Operations. All other Destination Pet employees should refer all media inquiries to the Director of Strategy and Business Operations and should not respond to such inquiries and provide no further comment unless specifically authorized

to do so by the Director of Strategy and Business Operations. Even if a member of the media or publication continues to ask for a response or promises that the response will be on an unattributed basis, the employee should continue to refer to the Director of Strategy and Business Operations. The employee should notify the Director of Strategy and Business Operations if the employee has been approached by a member of the media on this basis.

4.3.2 Preservation of Confidentiality. Destination Pet is required by law or contract to keep certain information confidential, and thus Destination Pet must take steps to avoid disclosing confidential information or violate any trading laws in any public statement, speech, media interview, appearance, or similar communication ("**Statements**"). All Statements to news media or in publications by Destination Pet employees must be cleared in advance by the Director of Strategy and Business Operations. If the Statement is approved, the Director of Strategy and Business Operations may restrict the topics on which the employee may comment, and the employee must follow any such instruction.

4.3.3 Spokesperson Requests. From time to time, Destination Pet may ask an employee to be a spokesperson for a particular event or development. The employee is not required to act as a spokesperson if the employee has any reservation about doing so.

4.4 Social Media. The internet provides unique opportunities to participate in interactive discussions and share information on topics using a wide variety of Social Media. The following requirements apply to the use of Social Media:

4.4.1 Responsibility for Postings. Each Destination Pet employee is solely responsible for the content the employee posts on Social Media. Before posting on Social Media, employees should consider some of the risks and rewards that are involved.

4.4.2 Confidentiality. Employees must maintain the confidentiality of (a) private information of Destination Pet employees, customers, and vendors, (b) Destination Pet's trade secrets (which may include information regarding the development of systems, processes, products, know-how and technology), (c) information that Destination Pet has identified as confidential, (d) information about a third party that Destination Pet has agreed to keep confidential, and (e) information required by law to be confidential. Employees should not post on Social Media (a) any information about or that may be used to identify Destination Pet employees, customers or vendors, (b) internal Destination Pet reports, policies, procedures, or (c) other internal business-related confidential communications. The law prohibits communicating or giving a "tip" on inside information to others so that others may buy or sell stocks or securities, even if the information is about other companies.

4.4.3 Application of Other Policies. Employees should understand all of Destination Pet's policies to ensure their postings are consistent with the policies before posting on Social Media. Requirements relating to Social Media postings are set forth not only in this Policy, but also in other Destination Pet policies, including the General Business Standards Policy and Human Resources Policy.

4.4.4 Links Only with Identification. Employees should not create links from their blogs, websites, or other Social Media to a Destination Pet website without identifying themselves as a Destination Pet employee.

4.4.5 Expression of Personnel Views. Employees should express only personal opinions on Social Media. Employees should not represent themselves as a spokesperson for Destination Pet unless specifically authorized to do so. If an employee is posting content related to Destination Pet or the work the employee does, the employee should be clear and open about the

fact that the employee is an employee and clarify that the employee's views do not represent the views of Destination Pet, fellow colleagues, owners, customers, suppliers, or people working on behalf of Destination Pet. The employee should include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of Destination Pet."

4.4.6 Honesty and Accuracy. Employees should ensure that information they post on Social Media is honest and accurate and correct any mistakes quickly. Employees should be open about any previous posts that have been altered, especially because deleted postings may be archived online and can be searched. An employee should never post any information or rumors about anyone (including fellow employees, customers, suppliers, Destination Pet itself or Destination Pet's competitors) that the employee knows or believes to be false.

4.4.7 Inappropriate or Offensive Postings. Employees should always be fair and courteous to fellow employees, customers, suppliers, people who work on behalf of Destination Pet and Destination Pet's competitors. Work-related complaints are more likely to be resolved by speaking directly with co-workers, the employee's supervisor, or someone in management than by posting complaints to Social Media. If an employee posts complaints or criticism on Social Media, the employee should avoid using statements, photographs, video, or audio that (a) reasonably could be viewed as malicious, obscene, threatening, or intimidating, (b) disparages customers, members, employees, or suppliers, or (c) might constitute harassment, bullying, or defamation. Examples of such conduct include posts meant to intentionally harm someone's reputation, posts that could contribute to a hostile work environment on the basis of race, sex, sexual orientation, gender identity, disability, religion, or any other status protected by law or Destination Pet policies, posts containing false or misleading information, or posts omitting information which omission leads to false or misleading impressions.

4.4.8 Responding to Negative Postings. If an employee discovers negative or disparaging posts about any employee, customer, vendor, Destination Pet, or Destination Pet's competitors, the employee should forward the posts to the Director of Strategy and Business Operations, who will respond as necessary to posts made on Social Media.

4.4.9 Personal Postings Using Destination Pet. Employees should not use Social Media while on work time or on equipment provided by Destination unless doing so is work-related as authorized by the employee's manager. Employees should not use Destination Pet email addresses to register on Social Media for personal use.

4.4.10 Work-Related Postings. Employees may use Social Media as part of professional duties to promote the business of Destination Pet. All such postings on Social Media must be specifically authorized and pre-cleared by the Director of Strategy and Business Operations. Social Media postings created by employees as part of professional duties, and the followers of these postings, belong to Destination Pet and are the intellectual property of Destination Pet. Destination Pet may assume control of and re-assign such postings or followers if Destination Pet wishes to do so, and the employee must take all steps necessary to facilitate this. Destination Pet employees may be asked to immediately remove content on Destination Pet's Social Media even if that content was previously approved.

4.5 Consequences. An employee who violates this Communication Standards Policy may be subject to disciplinary action up to and including termination. In addition, Destination Pet prohibits retaliation against any employee for reporting a possible deviation from this Policy or for cooperating in an investigation, and any such retaliation will be subject to disciplinary action up to and including termination.

ACKNOWLEDGMENT

I hereby acknowledge that I have received and reviewed Destination Pet's Communication Standards ("**Policy**") dated December 2020.

I acknowledge that any questions I had regarding the Policy have been answered. I certify that I fully understand the Policy and I agree to be bound by, and shall continue to comply, with the Policy.

I understand that failure to comply with the Policy may subject me to immediate adverse action, which may include suspension or termination of employment.

Print Name: _____

Signed: _____

Date: _____