

At Tavant Technologies (the “Company” or “Tavant”), we recognize that employees may choose to participate in activities on Social Media (as defined below), including to share their lives and opinions with friends, family, and co-workers. Such activities also present certain risks and carry with them responsibilities.

The Company developed this policy to set out its expectations for employees using the Internet to access and use social networking sites such as Facebook, Twitter, Instagram, online discussion forums, video and photo sharing forums, wikis, blogs, or any other form of social media (collectively, “Social Media”), whether on Company resources or time or on personal equipment and time, when such use reflects upon or may impact the Company.

This policy along with the Company’s Computer and Internet Usage section in the Employee Handbook shall be applicable to all Employees, Interns and Project Trainees of Tavant. Violation of this policy may result in discipline up to and including termination of employment.

### **Personal Responsibility**

The Company expects employees to act responsibly when using Social Media. Such activities must not interfere with the employee’s performance of their job duties. When such activities involve or impact an employee’s employment or otherwise impact or reflect upon the Company, they must comply with all Company work-related policies, as further discussed below. Furthermore, under no circumstances are employees permitted to use Company resources to access, download, or contribute to Social Media sites that contain illegal or inappropriate content such as pornography or other sexually-oriented materials; gambling; information related to illegal drugs; or discriminatory, harassing, or defamatory content.

Employees should remember that any messages or information sent on Company-provided equipment to one or more individuals via an electronic network—for example, Internet mailing lists, bulletin boards, and online services—are statements identifiable as originating from Tavant Technologies. Remember that what you write is public and will be for a long time.

To the extent employees discuss their employment or identify themselves as Company employees on Social Media, the Company expects employees to use good judgment and to avoid stating personal opinions so as to suggest that they are the opinions of the Company. Where appropriate, employees should include a disclaimer, to the effect that - “Views expressed on this site are my own, and do not necessarily represent those of my employer.” Employees should also stick to their area of expertise; opinions and statements provided should be truthful and genuine.

### **Compliance with Work-Related Policies:**

While the Company respects its employees’ right to free expression, employees must also realize their communications – even when made on their own time and using their own equipment – may impact the Company. Any postings to Social Media, to the extent they involve or impact an employee’s employment, the workplace, or the Company, are subject to all Company workplace policies, including, but not limited to, those: prohibiting harassment or discrimination; prohibiting disclosure of Company’s confidential, proprietary or trade secret information; and governing appropriate use of Company’s electronic resources. Examples of prohibited conduct include, but are not limited to:

- Posting comments about co-workers, managers, subordinates, vendors and consultants, customers, or business partners that may reasonably be viewed as malicious, vulgar, obscene, threatening, intimidating, harassing, or otherwise in violation of the Company’s workplace policies against unlawful discrimination and harassment. (Do not engage in any personal attacks. Do not make statements that reflect poorly on yourself or the Company.)

Do not make any political and/or religious comment in any circumstances where Tavant's name or any employee's association with it is also mentioned.

- Posting defamatory material about a co-worker (or manager or subordinate) or a vendor's services. (Post meaningful, respectful comments—in other words, no spam and no remarks that are off-topic or offensive. When disagreeing with others' opinions, keep it appropriate and polite. Always stop and think for a moment before posting or sending.)
- Posting pictures or videos (including from Company social events/ Tavant premises) of, or private personal information about, Company and employees and other third parties who do business with the Company, such as home-addresses or other personal contact information, or names of co-worker's family, without their permission.
- Posting Company's confidential or proprietary or intellectual property or trade secret information to a personal profile, such as those maintained on LinkedIn or Facebook; such confidential and trade secret information may include non-public revenue performance data; confidential information about work-related projects; the development of systems, processes, or procedures; or internal reports, policies, procedures, or other internal, business-related confidential communications.

Nothing in this policy is intended to, and the policy will not be applied in a way that would, restrict or otherwise interfere with an employee's right to engage in concerted activity under the applicable law or other legally protected activities, including the right to self-organize, form, join or assist labor organizations, to bargain collectively with representatives of their choosing, or to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection, or to refrain from engaging in such activities. For example, the policy does not restrict employee use of Social Media to communicate with co-workers or others about the terms and conditions of their employment, such as wages, benefits, or working conditions subject to confidentiality agreement signed by you. This policy will not be construed or applied in a manner that interferes with the employees' rights under the applicable laws of the land. At all times, the Company intends to, and will, apply this policy in compliance with all applicable laws. Where applicable laws provide for greater restrictions on employee social media activity than those set forth in this policy, employees will be expected to adhere to those requirements.

Further, employees are prohibited from accessing password-protected online information without the authorization of the owner of the information and from exceeding the authorization provided with respect to access and use of password-protected information. Under no circumstances should a Company employee misrepresent their identity or affiliation, including through use of another person's password, to access online information that is not publicly available, including any such information contained on Social Media.

The Company takes seriously any complaints regarding inappropriate use of or postings to Social Media, including potential work-related harassment or discrimination, and reserves the right to investigate such complaints, and to take corrective action for violations of this policy.

Employees should use their professional judgment and take the most prudent action possible when posting to Social Media. Consult your manager or the Corporate Communications team if you are unsure.

**Monitoring and Searches; No Privacy:**

The Company reserves the right to monitor the amount of time spent on Social Media during regular business hours, and to monitor or search the Social Media content created, received, stored, or otherwise remaining on Company resources. The Company strongly encourages employees who wish to access Social Media for non-work-related activities not to use Company resources to do so. Employees should understand that they have no expectation of privacy in any activities conducted on Company resources and/or that affect the Company or the workplace (including, but not limited to, publicly available posts to Social Media or personal information created, received, stored, or otherwise remaining on Company resources) as the Company may monitor such online activities or content, and may search information on Company resources or publicly available information on the Internet.

**Corporate Use of Social Media**

Employees must exercise caution in searching for and relying on information from Social Media for workrelated purposes, including with respect to hiring or other employment decisions. This information may be inaccurate or otherwise unreliable or may reveal an individual's protected characteristics (e.g., sexual orientation or disability) that must not be considered in the hiring or employment decision. Employees should use good judgment when evaluating information from Social Media to make work-related decisions. The Company encourages employees to seek guidance from their managers or Human Resources should they have any questions in this regard.

Do not create any Group, Page, Network, etc. using the Company name (Tavant or Tavant Technologies). If it is required, contact Marketing team to create and own these.

**Authorized Corporate Representatives and Social Media:**

In the course of its business, the Company may authorize certain employees, as part of their duties and responsibilities, to post content online, including to Social Media, on behalf of the Company. While the Company respects its employees' right to personal expression, when asked to post on the Company's behalf, employees are directly representing the Company and their actions may have a direct impact on the Company. Therefore, the Company requires that such authorized employees follow the below guidelines. If an employee has any questions or concerns as to the content of any post, the employee should seek the advice of the Corporate Communications Team.

**Authorization:**

Only employees who have received prior written authorization from their manager or the Corporate Communications Team may post content, as a representative of the Company, to any online forum, including Social Media, owned or maintained by the Company or any third-party.

**Posting Review/Approval:**

The process for reviewing the content of a particular posting, including whether review and approval is necessary, will depend on the nature of the posting. All postings to third-party Social Media must be approved in advance by the employee's manager or the Corporate Communications Team. Typically, postings by an authorized employee to Social Media owned or maintained by the Company do not require prior review and approval. However, the Company encourages employees to seek the guidance of their managers should they have any questions about the propriety of any portion of an intended posting.

**Rights to Content Posted on the Company's Behalf:**

Authorized employees who post content on behalf of the Company grant the Company a non-exclusive license to reproduce, prepare derivative works of, distribute, perform, make, have made, use, or sell for any purpose any content posted on the Company's behalf. The Company will use reasonable efforts to credit authorship if the Company publicly displays, publicly performs, reproduces, or distributes such content. Employees grant the Company the right to their names for this purpose. Employees further grant Company the right to sublicense the above rights.

Tavant requests and strongly urges employees to report any violations or possible or perceived violations of this policy or any questions regarding which tools are deemed to be Social Media to their manager or Human Resources.

In the event that an employee has been found to have undertaken any action in breach of this policy or applicable law which is taken up for action by a law enforcement agency, then the employee shall be liable to defend himself/herself without any assistance from the Company, unless such breach has occurred due to an express written order from the management of the Company or any person that such employee reports to in the Company.

**Name:****Signature:****Title:****Date:**