

Employee Use of Social Media

POLICY # BCS-01-01

FINAL

PURPOSE

This policy is to advise employees on how to manage their use of social media for professional, as well as for personal use where their personal social media use (i.e.: outside of work, on their own devices, and/or using their own internet resources) may impact OLG and their employment, including the creation and dissemination of content about OLG products and services, other OLG employees, consumers, vendors, and stakeholders.

APPLICATION AND SCOPE

The policy applies to all OLG employees who access, use, or otherwise participate in any form of activity on social media for either professional or personal use where that might impact OLG or its interests in any way, directly or indirectly.

POLICY STATEMENT (& GUIDING PRINCIPLES)

Employees' professional use of social media can affect the reputation of OLG, as can their personal social media use if they choose to involve OLG. As part of their employment agreement with OLG, all OLG employees are also bound by the existing Code of Business Conduct Policy, relevant IT policies, and applicable OLG Social Media Guidelines.

DEFINITIONS

Authorized Employees: OLG employees who engage in social media on behalf of OLG as per their job description, including social media administrators and spokespersons, as well as any other employees authorized by a relevant line of business or stakeholder to engage in social media on behalf of OLG.

Content: any form of information that is contained in or otherwise expressed through any form of media (whether now known or hereinafter devised) including, but not limited to: comments; posts; texts, photographs; images; videos; audio files; icons; designs; trademarks; tradenames and software.

OLG Content: content that is owned or licensed by OLG, including but not limited to, registered and unregistered official marks, trademarks, tradenames and other intellectual property of OLG.

OLG Social Media Channel: any social media channel or platform that is owned or operated by, or on behalf of, OLG.

Personal Use of Social Media: employees' engagement in social media outside of regular working hours and/or through their own devices and/or internet resources, and/or using accounts that are traceable to non-OLG e-mail addresses.

Professional Use of Personal Social Media: authorized use of social media for approved profession-related activities using employee' personal social media accounts. Profession-related activities include, but are not limited to, self-identification as an OLG employee on an online forum associated with a profession-related conference or event or tweeting about a professional subject at a profession-related event. Such activities may include use of external social media channels (e.g., LinkedIn) and internal social media channels (e.g., OLG Connections). Professional use of personal social media is not work and is not an activity undertaken on behalf of OLG.

Professional Use of Social Media: employees' engagement in social media in a professional capacity using social media channels that are traceable to OLG email addresses. Professional use of social media will be part of the role and responsibility of Authorized Employees.

Public Information: any information that has been communicated publicly outside of OLG through approved channels.

Social Media: websites and applications that enable users to create and share content or to participate in social networking and reviews. Including, but not limited to, channels, groups, pages and platforms that allow users to post any form of user generated content such as messaging, posts, stories, comments, shares, hashtags, mentions, tags, reactions, forums, chat rooms, blogs, microblogs, media and other content via a social network whether public or privately available. Some examples of social networks are Facebook, Instagram, Twitter, YouTube, Snapchat, LinkedIn, TikTok, etc.

REQUIREMENTS

Personal and Professional Use of Personal Social Media

- 1.1. Professional use of social media by OLG employees is limited to Authorized Employees, as determined by the various lines of business and that these employees must be familiar with and comply with the OLG Employee Social Media Guidelines.
 - 1.1.1. Unless directed otherwise by OLG, employees should refrain from involving OLG or its employees, consumers, vendors, and stakeholders in their personal and professional use of personal social media in order to lessen their risk of being disciplined for breaching this policy (or other applicable policies and guidelines) and the potential personal legal liability that may result if their personal use of social media also violates applicable law (e.g. breach of confidentiality, defamation, harassment, etc.). Notwithstanding the foregoing:
 - Professional use of personal social media by employees is permitted at work when participating in a professional association forum discussion and self-identifying as an OLG employee. This may include use of such social media channels as LinkedIn.
 - Personal use of social media by employees is permitted at work so long as it does not conflict with employment duties and obligations and is not for more than a trivial amount of time. Such use must comply with applicable OLG policies and guidelines, including but not limited to this policy and corporate IT policies (including but not limited to: Acceptable Use of Information Technology Resources, and Password Management).
- 1.2. Employees owe a duty of loyalty and confidentiality to OLG that prevents them from engaging in conduct harmful to OLG's interests even outside of normal working hours and outside of physical workplaces. These duties of loyalty and confidentiality therefore limit the type of content that employees may generate on social media, even when using their own devices and internet resources. This policy is not intended to limit employees' personal use of social media that does not involve and will not impact OLG, including its employees, consumers, vendors, and stakeholders.
- 1.3. Employees are responsible for their engagement on social media and must strictly adhere to the following requirements when engaging in personal use of social media and/or professional use of personal social media:
 - 1.3.1. Employees must not use OLG network passwords for any social media or other use.
 - 1.3.2. Employees are expected to conduct themselves professionally both on- and off-duty.
 - 1.3.3. Employees must refrain from generating and/or sharing content involving:

- Proprietary, confidential, or sensitive work-related information, including but not limited to:
 - OLG customers, stakeholders, partners, business or affairs
 - Government affairs or politics, insofar as those relate to OLG or issues that affect OLG
- 1.3.4. Offensive and unlawful statements, including but not limited to discriminatory, harassing, and hateful content regarding others, (e.g. OLG employees, users, consumers, competitors, vendors and other stakeholders)
- 1.3.5. Defamatory expressions regarding OLG or others, (e.g. OLG employees, users, consumers, competitors, vendors and other stakeholders)
- 1.3.6. Unauthorized use of copyright materials, corporate logos, or corporate materials, including unauthorized use of OLG content
- 1.3.7. Inaccurate or misleading work-related content
- 1.4 However, unless directed otherwise by OLG, employees should refrain from involving OLG or its employees, consumers, vendors, and stakeholders in their personal and professional use of personal social media in order to lessen their risk of being disciplined for breaching this policy (or other applicable policies and guidelines) and the potential personal legal liability that may result if their personal use of social media also violates applicable law (e.g. breach of confidentiality, defamation, harassment, etc.). Notwithstanding the foregoing:
 - 1.4.1 Professional use of personal social media by employees is permitted at work when participating in a professional association forum discussion and self-identifying as an OLG employee. This may include use of such social media channels as LinkedIn.
 - 1.4.2 Personal use of social media by employees is permitted at work so long as it does not conflict with employment duties and obligations, and is not for more than a trivial amount of time. Such use must comply with applicable OLG policies and guidelines, including but not limited to this policy and corporate IT policies (including but not limited to: Acceptable Use of Information Technology Resources, and Password Management).
- 1.5 Communications with customers and/or the public by OLG employees are considered records. Employees should ensure that the communications related to those interactions, regardless of the means of that communications (e.g. chat, tweet, emoji, email, discussions), are retained in accordance with OLG's retention policies. In instances where the means of communications is not controlled by OLG, employees should make a copy of the communication, including date and time stamp where appropriate, and save the copy to an appropriate repository.
- 1.6 Employees should assume that any information they learn about OLG, its employees, consumers, vendors, and stakeholders is private, confidential and/or proprietary, and may not be disclosed or reproduced in any way without the prior written consent of OLG and anyone whose information is at issue. Information is subject to FIPPA and OLG must comply, see OLG Social Media Guidelines for more information.
- 1.7 Unless specifically directed to do so by a Divisional Vice-President, employees must not add personal commentary or opinion to public information concerning OLG if it is to be shared over social media channels.

- 1.8 Employees must clearly distinguish between personal use of social media and professional use of social media. For example, personal e-mail addresses should be used for personal communications, and OLG e-mail addresses for work-related communications.
- 1.9 Employees must be respectful while engaging on all social media channels. Additionally, OLG social media channels are considered OLG work areas and relevant policies, procedures, and codes of conduct apply.
- 1.10 Employees will be held accountable for all content they generate on social media channels whether that is through personal use of social media or professional use of personal social media. Employees generating content that is identified as inappropriate, as determined by OLG, will be asked to delete the content or, where possible, may have such content removed by OLG.
- 1.11 Employees may not attempt to circumvent this policy by engaging in inappropriate personal social media use using a pseudonym, masquerading as someone else, or stipulating that content violating this policy, represents their personal views only.
- 1.12 Employees should report breaches or suspected breaches of this policy to their managers immediately.
- 1.13 Breaches of this policy may result in discipline, up to and including termination. However, employees who self-report inadvertent breaches of this policy may be treated more leniently than those who fail to do so and/or those who breach it deliberately.
- 1.14 If there are any questions or concerns about how to use or engage social media or how to respond to users' content, employees should consult their manager prior to posting any content or otherwise participating in social media.

ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITIES
Social Media Team	<ul style="list-style-type: none"> ▪ Providing guidance on social media use ▪ Providing guidance for managing escalation of social media issues
Leaders	<ul style="list-style-type: none"> ▪ Providing guidance and addressing employee questions on social media matters ▪ Responding and taking appropriate action on OLG social media channels in situations that are questionable or otherwise not addressed under this policy or applicable guidelines, processes, and procedures ▪ Engaging Social Media team for support or handling escalations ▪ Providing additional guidelines and processes to employees as needed for their line of business
OLG Employees	<ul style="list-style-type: none"> ▪ Reporting actual or suspected non-compliance to this policy ▪ Exercising good judgment when engaging on any social media channels to ensure the public image, reputation, brand, and goodwill of OLG is protected and maintained

RELATED POLICY INSTRUMENTS

- Business Code of Conduct and Conflict of Interest
- Acceptable Use of Information Technology Resources
- Password Management
- OLG Employee Social Media Guidelines

POLICY OWNER

Director, Social Media

POLICY APPROVAL

Approver	Policy Version	Date
Maxine Chapman, VP Brand & Marketing Officer	BCS-01-01	August 30, 2022
Beth Webster, SVP Marketing, Communications & Stakeholders Relations	CP-09-02-001	March 13, 2015

REVISION / REVIEW HISTORY

Revision / Review Date	Updated By	Summary of Revision / Review
August 10, 2022	Policy Services	<ul style="list-style-type: none">▪ Supersedes Employee Use of Social Media Policy #CP-09-02-001▪ Refreshed policy to align with OLG Policy on Policies (moved information procedural in nature from Policy to related Guideline document)