

**Policy Statement**

The following policy applies to all employees. The firm recognizes there are two uses for social media: business and personal. Social media platforms provide a way to communicate and share information quickly and easily with clients, friends and family. Facebook, Twitter, YouTube, WordPress, LinkedIn and Blogger social media outlets are just a few of the many available outlets.

The Social Media Policy is intended to provide guidance to employees on the use of social media.

**Principles of Social Media Use**

All social media exchanges shall follow these four basic principles:

- Treat all social networking as advertising;
- Monitor social media use frequently;
- Maintain comprehensive records of use (see Recordkeeping Responsibilities); and
- Avoid testimonials (don't click on "Like" or "Thumbs-Up" buttons).

**Business Use of Social Media**

The firm does not allow social media to be used for business purposes under any circumstances.

**Personal Use of Social Media**

The firm recognizes the rights of its employees to use social media as a form of self-expression and communication. The firm does not restrict employees from using social media for personal use, but certain conditions must be agreed to:

1. If employees identify themselves as an employee of the firm, they must clearly state they are not representing the firm on these sites;
2. No use of company logo;
3. Refrain from posting items that could reflect negatively on the firm's reputation;
4. Should not be accessing and posting while on company time;
5. Cannot solicit any firm business through the sites;
6. Protect the privacy of the firm's clients, do not post confidential information; and
7. Agree to comply with the firm's policy.

Employees should use sound judgment and common sense when using social media and take responsibility for what is posted. If an employee becomes aware of any violation of the firm's policy, he/she should report it immediately to the Chief Compliance Officer.

**Supervision**

Because the firm does not allow the use of social media for business purposes, there is not an ongoing surveillance program. The firm does require every employee to adhere to the policy and acknowledge such by signing the policy at least annually.

**Failure to Comply**

Any deviation from the social media policy may be subject to disciplinary action up to and including termination.

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I have read and understand the contents of this Policy and will act in accordance with it as a condition of my employment with the firm. I do not have any social media sites I use for business purposes.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date