



La Posada Providencia's SOCIAL NETWORKING AND BLOGGING POLICY

La Posada Providencia acknowledges the popularity of social media sites, blogs, chat rooms, personal websites, and other internet communications as a means for sharing experiences, ideas, and opinions. However, because of legal and other ramifications that may stem from the use of interactive websites, **La Posada Providencia** has adopted the following policy regarding internet communications both during working and non-working time.

Interactive Internet Communications

This policy covers employees creating, posting, commenting or uploading to any internet website, including but not limited to blogs, media sites, chat rooms, bulletin boards, newsgroups, video and picture sharing sites, social networking sites (e.g., Facebook, Twitter, Instagram, SnapChat, etc.), personal websites, and discussion forums, whether or not such sites are set to private. Employees are free to create or participate in interactive internet communications provided that such participation does not violate any of **La Posada Providencia's** policies and does not interfere with an employee's regular work duties. The provisions of the Company's "Use of Communications and Computer Systems" policy, including but not limited to the Company's right of monitoring, apply with equal force to employee access and use of blogging and other interactive internet communications.

Blogging During Work Hours

Incidental personal use of the Company's technology resources for blogging and participating in other forms of interactive internet communication is permitted so long as it does not interfere with job performance and is otherwise in compliance with this policy. If an employee's job is adversely affected by such activities, the employee may be subject to disciplinary action, up to and including immediate termination.

Blogging Requirements

Employees must comply with the following requirements when blogging during working or non-working time:

- If an employee's posts or communications on social media sites mention **La Posada Providencia**, its employees, clients, practices, methodologies, pricing and services it provides, the employee must make clear that the views posted are that of the employee and may not represent the views of the Company.
- Employees also may not issue on **La Posada Providencia's** behalf any publicity or public statements regarding the Company, its clients, practices, methodologies, pricing and services or anything else relating to the company's business practices. It is imperative that **La Posada Providencia** be responsible for all official external communication to deliver appropriate messages on behalf of the Company.



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- Employees may not disclose trade secrets or confidential business information concerning Company, its clients, practices, methodologies and services or anything else relating to pricing, marketing strategies, communications, etc. belonging to the Company or any companies and their employees with which Company conducts business, including through blogs and other internet postings. In addition, employees must not disclose certain **La Posada Providencia** financial information in violation of securities laws or regulations.
- Employees may not post malicious, obscene, abusive or unlawful comments, or comments that might constitute harassment or bullying, regarding the Company, its clients or any company and their employees with which **La Posada Providencia** conducts business. Examples of such conduct might include offensive posts that could contribute to a hostile work environment on the basis of race, sex, gender identity, disability, religion or any other status protected by law.
- Employees should never maliciously post any information or rumors that they know to be false about **La Posada Providencia**, its clients and any companies and their employees with which the Company conducts business.
- Employees wishing to post blogs or other public internet communications should be aware that copyright and trademark law may restrict the use and copying of material belonging to **La Posada Providencia** and others. Employees may not violate the intellectual property rights of others.
- All blogging and other internet activity, regardless of whether it is done on non-working time, is subject to **La Posada Providencia**'s policies, including but not limited to the Company's policies titled "Use of Communications and Computer Systems," "Equal Employment Opportunity," and "Anti-Harassment and Complaint Procedure." If conduct is in violation of these policies, **La Posada Providencia** may request that the offensive posting be removed.

Nothing in this policy should be interpreted to prohibit employees from collectively discussing or taking legally protected action with regard to the terms and conditions of their employment or from discussing their wages or working conditions.