



Stenson Tamaddon Communication and Social Media Policy

February 2, 2024

I. Introduction

Policy Statement. StenTam is firmly committed to honestly and transparently interacting and communicating with our clients, each other, and the public. StenTam also respects each employee's privacy, including the use of social media. Accordingly, the purpose of the this policy is to protect our brand, legal interests, and privacy of all StenTam employees, clients, and business partners.

II. Definitions

1. "Social media" includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity website, web bulletin board or a chat room, whether or not associated or affiliated with the Company, as well as any other form of electronic communication.

III. Policy

1. No employee is authorized to speak on behalf of the Company, unless permitted to do so by a StenTam Partner or his designee. Speaking on behalf of the Company includes, but is not limited to, serving as a panelist or giving a presentation at conferences, interviews with the media, or any online or social media posting, message, or content that states or creates the impression that the social media posting, message, or content is from or on behalf of StenTam.

2. If a member of the media contacts you related to StenTam's business, services, or in any way related to your employment, do not provide any information; instead, refer them to your supervisor or to StenTam's Chief Legal Officer.

3. No employee is authorized to engage in any personal, social media activity (e.g., posting content, etc.) during working hours or on Company premises.

4. Use of Social Media:

a. Be Honest and Accurate. Never represent yourself as a spokesperson for StenTam or speak on the Company's behalf. Always be honest and accurate. If you make a mistake, quickly correct it. Content posted on the Internet can live forever.

b. Know the Rules. Read and understand StenTam's Code of Ethics, policies (including StenTam's Bullying, Harassment, and Discrimination policy), and Employee Handbook, and know what is expected of you as a StenTam employee. Social media should never be used in a way that violates any Company Code of Ethics or policies.

c. Consider the impact. You are solely responsible for what you post online. Consider the risks and negative impacts that could result when you post anything on a social media platform—which content may last forever. Consider whether your online content could adversely affect your job performance, the performance of other employees, StenTam or its legitimate business interests, our employees, clients, or business partners.

d. Be Respectful. Always be respectful, polite, and courteous to others—even if you disagree. Do not post offensive content meant to intentionally harm someone’s reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion, or any other status protected by law or Company policy. If you have a question, concern, or a work-related complaint, you should first consider directly speaking with your co-worker(s) or supervisor, using the Speaking Up hotline, or using StenTam’s Open Door policy instead of posting complaints to a social media outlet. If you decide to post complaints or criticism, avoid using any communication (*i.e.*, statements, photographs, video, audio, etc.) that could reasonably be viewed as malicious, obscene, defamatory, threatening, intimidating, disparaging, or that constitutes bullying, harassment, or discrimination.

e. Maintain StenTam’s Confidentiality. Never disclose any personal information about employees, clients, business partners, or proprietary or confidential information (*i.e.*, pending deals, legal disputes, pricing, technology, internal reports, or business-related communications).

f. Anti-Retaliation. Do not use social media to retaliate against any person for making a good faith report of actual or suspected violation of law or policy.

5. Off-working hours. Each employee is responsible for his or her online content, postings, material, and behavior—even when the posting occurs during off-working hours. As described below, StenTam may discipline any employee who online activities adversely affect StenTam’s interests or brand or present business or legal risk or violate the Company Code of Ethics or policies.

III. Violation of this Policy.

Violation of this policy may result in disciplinary action, up to and including termination of employment.

The StenTam Chief Legal Officer is the proponent of this policy. Any questions concerning this policy should be addressed to the Chief Legal Officer, or his designee.