

SOCIAL MEDIA POLICY

XXXXXX understands that social media can be a fun and rewarding way to share your life and opinions with family, friends, and co-workers. However, as a XXXXX employee the use of social media carries responsibilities and also presents certain risks. Employees are reminded that they have no reasonable expectation of privacy in the workplace or when using work-provided equipment. XXXXX will engage in routine and/or random monitoring of employee use of social media and other websites while at work or using employer-provided equipment and networks. However, XXXXX will never ask an employee to disclose his or her confidential passwords to his/her personal accounts or services.

“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 website, social networking or affinity website, web bulletin board or a chat room, whether or not associated or affiliated with XXXXX, as well as any other form of electronic communication.

To assist you in making responsible decisions we have established these guidelines for appropriate use of social media.

Guidelines

The principals and guidelines found in XXXXX other policies in our Handbook apply to your activities online. You are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow XXXXX employees or otherwise adversely affects customers or XXXXX legitimate business interests may result in disciplinary action, up to and including termination.

Further, XXXXX owns its social media accounts and personas created and/or associated with those accounts. XXXXX will choose the password and username for any XXXXX-owned accounts, neither of which can be changed without XXXXX permission. All social media accounts, including log-in information and passwords, must be relinquished at the end of employment. An employee has no right to use XXXXX accounts after his/her separation from employment. An employee acts on behalf of XXXXX any time he/she updates corporate-branded or official social media, regardless of whether that employee uses his/her own device (including, but not limited to, Smartphones, personal computers, and tablets).

Employees who wish to set up a social media account (or utilize their personal social media accounts) for the purpose of increasing their personal sales efforts must obtain the permission of their direct manager, as well as the Regional Marketing Manager prior to doing so. The discussion of offers or sales terms of products or services through social media are subject to the same advertising laws, rules, and regulations that apply to the dealership. The employee and the dealership may both be liable for improper advertising messages. Any offers or sales or credit terms with customers or potential customers must follow all advertising laws, rules and regulations. Employees utilizing social media to increase their personal sales efforts must ensure

that all such efforts are legally compliant and should consult their manager and/or Regional Marketing Manager with any questions regarding advertising compliance.

XXXXXX monitors social media and anywhere XXXXX appears in social media, including personal postings, regularly. Carefully read these guidelines as well as the other policies contained in your Handbook and ensure that your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action, up to and including termination.

In according with applicable law, employees are absolutely prohibited from posting any confidential customer information online, including any information that identifies or could be used to identify customers of XXXXX.

Be Respectful

Employees are reminded to always be fair and courteous to fellow employees and customers. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or manager than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene threatening or intimidating, that disparages customers or fellow XXXX employees or that might constitute harassment or bullying.

This policy does not prohibit employees from lawfully complaining about management, co-workers, policies, or XXXX, particularly regarding wages, hours and working conditions, XXXX encourages employees to speak with his/her manager or Human Resources Business Partner with any complaints or concerns about their job.

Be Honest and Accurate

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about XXXX, fellow employees, customers or competitors.

Maintain the confidentiality of XXXX trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications. Do not create a link from your blog, website or other social networking site to a XXXXX website without identifying yourself as a an employee of XXXXX. Express only your personal opinions. Never represent yourself as a spokesperson for XXXXX. If XXXXX is the subject of your content, make clear that you are an employee of XXXXX, and that your views do not represent those of XXXXX and make it clear that are not speaking on behalf of XXXXX.

XXXXX prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.