

Social Media Policy

Responsible Individual: Chief Human Resources Officer

Approved By: NCH CEO Cabinet

October 10, 2022

Page 1 of 3

Purpose:

At North Country Healthcare, Inc., and its affiliate organizations ("NCH"), it is understood that social media can be a fun and rewarding way to share life and opinions with family, friends, and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist in making responsible decisions about use of social media, these guidelines have been established for appropriate use of social media. This policy applies to all employees who work for NCH. Some positions may have stricter requirements around the use of social media which would be outlined in their job description.

Definitions:

Any reference to "NCH" or "Facility" refers to the affiliates of North Country Healthcare - Androscoggin Valley Hospital, North Country Home Health & Hospice Agency, Upper Connecticut Valley Hospital, Weeks Medical Center and their related clinics and delivery sites.

General:

Guidelines

In the rapidly expanding world of electronic communication, *social media* can mean many things. *Social media* includes all means of communicating or posting information/content of any sort on the Internet, including to one's own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with NCH, as well as any other form of electronic communication.

The same principles and guidelines found in NCH policies and three basic beliefs apply to all activities online. Ultimately, employees are solely responsible for what they post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any conduct that adversely affects job performance, the performance of fellow employees or otherwise adversely affects fellow employees, contractors, vendors, or other people who work for or are connected with NCH or NCH's legitimate business interests may result in disciplinary action up to and including termination.

Know and Follow the Rules

Carefully read the following guidelines: Privacy Policies for the Use and Disclosures of Protected Health Information, Protected Health Information Uses and Disclosures, Rights and Responsibilities of Patients, Code of Conduct, Medical Staff Professionalism, Workstation and Mobile Device, Corporate Compliance Program, Privacy and Information Security Infraction Sanctions, and ensure postings are consistent with these policies. Inappropriate postings that may include patient information, discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may be subject to disciplinary action up to and including termination and, if found to disclose confidential patient information, may also result in government action.

Be Respectful

Always be fair and courteous to fellow employees, contractors, vendors, or other people who work for or are connected with NCH and its affiliates. Also, keep in mind that someone is more likely to resolve work-related complaints by speaking directly with co-workers or with management than by posting complaints to a social media outlet. Nevertheless, if deciding to post, avoid using statements, photographs, video, or audio that could reasonably be viewed as malicious, obscene, threatening or intimidating, that disparage anyone connected with NCH or its affiliates, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment based on race, sex, disability, religion, sexual or gender orientation or any other status protected by law or company policy.

Be Honest and Accurate

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Page 2 of 3

Make sure to always be honest and accurate when posting information or news, and if making a mistake, correct it quickly. Be open about any previously altered posts. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors known to be false about NCH or its affiliates, or anyone connected with them, or that contains confidential information.

Post Only Appropriate and Respectful Content

- Maintain the confidentiality of all private or confidential information. Such information may include patient information or information regarding the development of systems, processes, business plans, products, know-how and technology. Do not post internal reports, policies, procedures, or other internal business-related confidential communications.
- Do not comment on trade secrets and proprietary information (business, financial and marketing strategies) without the advance approval of a supervisor and the Human Resources Department.
- Do not make negative comments about patients in any social media.
- Use of social media on NCH equipment during working time is permitted, if the use is for legitimate, preapproved NCH business. Discuss the nature of the anticipated business use and the content of the message with a supervisor and Human Resources. Obtain their approval prior to such use.
- Respect copyright, trademark and similar laws and use such protected information in compliance with applicable legal standards.
- The NCH (or any of its affiliated entities) logos, marks or other protected information or property may not be used for any business/commercial venture without the express written authorization of NCH.
- One may not make knowingly false representations about their credentials or their work.
- One may not make knowingly false accusations against NCH and/or against another employee, customer or vendor.
- Do not create a link from one's personal blog, website, or other social networking site to an NCH website without identifying oneself as an NCH employee.
- Express only one's personal opinions. Never represent oneself as a spokesperson for NCH or its affiliates unless that is part of one's job. If NCH is a subject of the content created, one must be clear and open about the fact that they are an employee and make it clear that their views do not represent those of NCH, fellow-to-fellow employees, contractors, vendors, or other people who work for or are connected with NCH and its affiliates. If publishing a blog or post online related to their work or subjects associated with NCH, they should make it clear that they are not speaking on behalf of NCH. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of NCH."

Using Social Media at Work

Refrain from using social media, to include filming using a mobile device, while on work time or on equipment provided, unless it is work-related as authorized by a manager or consistent with the company rules. Do not use an NCH email address to register on social networks, blogs or other online tools utilized for personal use.

Retaliation is Prohibited

NCH 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 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.

Media Contacts

Employees should not speak to the media on NCH's behalf without contacting the Marketing/Communication Department. All media inquiries should be directed to them.

For More Information

For questions or further guidance, contact an appropriate HR Department representative.



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Page 3 of 3

Rescission:

This policy is new and therefore does not rescind or replace any other.

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Chief Human Resources Officer

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