



## **GREENBRIER EMPLOYEE SOCIAL MEDIA USE GUIDELINES**

### **Introduction and Summary**

The Greenbrier Companies' Employee Social Media Use Guidelines are intended to provide employees and authorized representatives such as contractors and temporary employees with guidance in connection with their use of publicly-accessible social media. Although most personal use of social media does not concern Greenbrier, if personal use harms the Company, it can become a work-related matter. Employees' use of social media can pose risks to Greenbrier's confidential and proprietary information, reputation, and brands, can expose Greenbrier to discrimination and harassment claims, and can jeopardize Greenbrier's compliance with business rules and laws.

Therefore, Greenbrier expects employees and representatives to use social media in a way that does not harm our brand or reputation. We strictly prohibit any illegal or unethical activities.

Everything you do online is permanent, directly affecting your reputation, and may also affect Greenbrier's reputation or the reputation of our customers and partners. Greenbrier's brand and reputation are best represented by our people, and we encourage all parties to err on the side of caution and to represent Greenbrier in a way that exemplifies our corporate values.

We note, however, that nothing in these guidelines is intended to preclude or dissuade employees from engaging in activities protected by state or federal law, such as discussing wages, benefits, or other terms and conditions of employment, bargaining collectively through representatives of their choosing, raising complaints about working conditions for their own and their fellow employees' mutual aid or protection, or other legally required or protected rights, such as good faith whistleblower activity.

### **Overarching Principles**

For both internal and external social networks

#### **1. Greenbrier-sponsored social media accounts and platforms**

Greenbrier maintains company-sponsored social media accounts and platforms, including on Twitter, LinkedIn and Facebook. These accounts and platforms are organized and managed by the Greenbrier Marketing team. Any content you post on any Greenbrier-sponsored account must be approved in advance by the Greenbrier Marketing team or other authorized Greenbrier officers. Note that Greenbrier owns all

social media accounts used on behalf of Greenbrier or otherwise for business purposes, including any and all log-in information, passwords, and content associated with each account, such as followers and contacts. Greenbrier owns all such information and content regardless of the person who opens the account or uses it, and will retain all such information and content regardless of separation of any employee from employment with Greenbrier.

## **2. Be Responsible**

Make sure you are engaging in social media conversations the right way. You are personally responsible for any content you publish. You should never publish any content pertaining to Greenbrier that is not within your subject matter expertise or your level of authority. Be mindful that what you publish will be public indefinitely and can have a reach far beyond your control.

## **3. Transparency and Disclosure**

Make it clear in your social media activity that you are speaking on your own behalf. Write in the first person and use your personal email address when communicating via social media. If you are discussing Greenbrier-related matters and identifying yourself as a Greenbrier employee or contractor, make sure that your profile and related content are consistent with how you wish to present yourself to colleagues and customers. Be sure to make clear that you are not a company spokesperson. For consultants and third parties working on Greenbrier's behalf, you should clearly identify who it is that you are representing when you discuss Greenbrier-related matters. False identification and impersonation are strictly prohibited.

## **4. Authorized Communications/Disclaimers**

Unless you have been designated as an official Greenbrier spokesperson, it is recommended that you also include a disclaimer that your views do not represent those of your employer when you disclose your affiliation as an employee of Greenbrier. For example, consider such language as "the views in this posting reflect my personal views and do not represent the views of Greenbrier."

## **5. Confidentiality and Protection of Private, Confidential or Proprietary Information**

Always protect, and never disclose, Greenbrier's confidential, proprietary and/or intellectual property information, including, but not limited to, financial information, legal information, marketing, promotional or sales strategies, or information regarding features or products that could become the subject of a patent as well as any similar information you may have about third parties, such as a customer, partner or supplier. Also, never disclose any private or personally-identifiable information of any individual, whether an employee or a third party, and never cite or reference customers, partners, or suppliers without their approval.

## **6. Follow All Laws, our Code, and our Policies**

Social media lets you communicate incredibly fast, and thus your message could go viral in seconds. This may make it difficult to correct any inaccurate message once you have shared it. Therefore, you should always double check all content before you share it, both for accuracy and to make sure it fits within the Company's overall social media strategy, our Code of Business Conduct and Ethics, all Greenbrier policies (including those prohibiting harassment and discrimination) and any restrictions that may apply to your content based on applicable laws and the social media platform you are using (such as terms of service for the site).

## **7. Copyright Law concerns**

In addition, be mindful about copyright laws. Whenever you use social media, you are acting as a publisher, and it can be easy to violate copyright laws without intending to. When creating any social media account, you agree to that website's terms of use, which are written to place liability for copyright infringement on you as the user. Remember that when linking to or reprinting someone else's protected material, simply providing credit for that material will not immunize you from a possible copyright infringement claim. You may need to obtain permission to use any third-party or external links or content. Always make sure you take time to understand and follow applicable copyright, fair use, and disclosure laws.

## **8. Be Honest and Accurate**

When participating in online communities, always be honest and accurate. Always make sure that any information you provide, such as about Greenbrier products or services, is truthful, accurate, and not misleading.

## **9. Be Respectful**

You should consider social media to be an extension of the workplace if you discuss Greenbrier-related issues and/or when you have identified yourself as a Greenbrier employee or representative. Always use sound judgment and common sense, and adhere to our Company's values of respect for anyone with whom we interact. What is not appropriate in the workplace is also not appropriate in the virtual world. That means it is always inappropriate to engage in any conduct that would not be acceptable in Greenbrier's workplace or that is against our Company's values, such as using racial, ethnic, or sexist slurs, personal insults or obscenities. Being respectful on social media extends beyond respect for individuals; for example, you should also never disparage our competitors or their products or services.

## **10. Represent Our Brand and Reputation**

Greenbrier's brand and reputation are best represented by its people. Use good judgment about what you post and remember that anything you say can reflect on Greenbrier. Always strive to be accurate in your communications about Greenbrier and remember that your statements have the potential to result in liability for you or Greenbrier. Greenbrier encourages professionalism and honesty in social media and other communications. Make sure you are comfortable with Greenbrier's brand identity and values, and seek to reflect those values in your social media engagements.

### **11. Personal Use of Social Media**

Consistent with Greenbrier's Acceptable Computer, Mobile Device and Digital Use Policy, incidental personal use of social media on Company time and resources is acceptable, provided that such personal use does not (1) impact productivity or otherwise interfere with your responsibilities as a Greenbrier employee, (2) consume excessive resources or (3) create a hostile work environment.

### **12. Permanence and Discovery**

Nearly all internet activity is permanent, and in the case of a legal investigation, may be discoverable as well, meaning that it may be used against you and/or Greenbrier in a court of law. Even if you delete a post or comment, this does not truly remove the original content. Err on the side of caution, and do not share anything online that could pose a legal liability to yourself and/or Greenbrier.

### **13. Consequences for Violations**

Failure to follow these Social Media Use Guidelines may subject you to appropriate disciplinary actions, including termination of employment in appropriate cases. Please use common sense and good judgment to avoid any disciplinary issues when engaging in social media.

Adopted: November 20, 2018