**EXTERNAL COMMUNICATIONS POLICY**

**PURPOSE OF POLICY**

This policy is designed to enhance and maintain [EMPLOYER'S NAME]’s strong reputation and professional public image. It establishes guidelines and procedures to ensure that employees communicate with external parties in a consistent, effective, and professional manner.

**POLICY SCOPE**

This policy:

* Outlines the rules and expectations for employees managing external communications related to or on behalf of [EMPLOYER'S NAME]. For detailed guidance on handling media inquiries and interactions, refer to the company's [Media Relations Policy/[POLICY NAME]].
* Defines the individuals authorized to represent and speak on behalf of the company ("**Authorized Spokespersons**").

Key definitions

* External communications: All forms of communication directed to audiences outside of the company, including but not limited to telephone calls, letters, emails, newsletters, marketing content, social media posts, online articles, interviews, meetings, presentations, webcasts, and press releases.
* External parties: The intended recipients of external communications, such as customers, potential clients, suppliers, business partners, regulators, analysts, media outlets, and the general public.

In addition to federal regulations, this policy complies with applicable state laws, including those governing the confidentiality of corporate communications, whistleblower protections, and data privacy in Delaware. Employees in Delaware may have additional obligations under these laws and should consult the [Communications Department/[DEPARTMENT NAME]] for further details.

**POLICY APPLICATION AND RESPONSIBILITIES**

This policy applies to all employees, including officers and managers, and establishes requirements for external communication. All employees are expected to adhere to this policy in the following scenarios:

* Responding to external requests: Employees must follow outlined procedures when handling requests for corporate information. Corporate information includes the company’s statements, commentary, or views on issues, as well as information regarding employees, officers, directors, business operations, products, or services.
* Engaging with external parties: Employees communicating with any external audience about the company must comply with the standards and protocols outlined in this policy.

Delegated employee authorization

In some cases, an Authorized Spokesperson or the [Communications Department/[DEPARTMENT NAME]] may assign specific employees to represent the company in external communications. These employees must adhere to the following conditions:

* Written authorization: Employees will receive written, limited authorization from the [Communications Department/[DEPARTMENT NAME]] specifying the scope of their authority.
* Topic restrictions: Employees may only address topics directly tied to their area of expertise, or issues explicitly approved by an Authorized Spokesperson or the [Communications Department/[DEPARTMENT NAME]].
* Prohibited topics: Employees may not discuss any other matters or represent the company on unauthorized subjects.
* Coordination requirement: All speeches, statements, presentations, or communications must be coordinated with the [Communications Department/[DEPARTMENT NAME]] prior to release or delivery.

Other employees

To maintain a consistent and professional public image, all employees must adhere to the company’s coordinated communication strategy. This ensures that external messaging aligns with the company's goals and policies.

Employees are required to:

* Redirect requests: Forward all inquiries from external parties seeking corporate information to the [Communications Department/[DEPARTMENT NAME]].
* Policy adherence: Follow this policy and any relevant guidelines, such as the [Media Relations Policy/[POLICY NAME]], when handling external communication requests.
* Project consultation: Engage with the [Communications Department/[DEPARTMENT NAME]] at the outset of any corporate project that involves:
	+ Social media interactions.
	+ Public relations or marketing initiatives.
	+ Photography or video production.
	+ Content for external websites or publications.

**SOCIAL MEDIA USE**

To protect the company's reputation and ensure consistent messaging, the use of social media is governed by this policy and the company's [Social Media Policy/[POLICY NAME]]. These guidelines apply to both official corporate channels and personal social media activity when it relates to the company.

Employees must adhere to the following:

* Authorized communications: Only Authorized Spokespersons may represent the company on its official social media channels.
* Personal responsibility: You are personally accountable for all content you post online, including on social media platforms and other interactive web technologies. This includes potential legal liabilities for your posts.
* Distinction between personal and professional views: Clearly state that your social media posts represent your personal views, not those of the company. For example, include disclaimers like: "The opinions expressed here are my own and do not reflect the views of my employer."
* Professionalism and respect: Be thoughtful, transparent, and respectful in all posts to safeguard both your personal reputation and the company’s image.
* Confidentiality: Avoid sharing proprietary, confidential information, or trade secrets in your social media activity.
* Use of company branding:
	+ Only use the company’s logos, trademarks, or name if explicitly authorized.
	+ Unauthorized use of the company’s branding in your social media handles, posts, or screen names is prohibited.
* Permanent impact of posts: Remember, once published, online content may be impossible to delete. Exercise caution and consider the long-term implications of your posts.
* Consultation: If you are unsure about whether your planned post aligns with these guidelines, consult the [Communications Department/[DEPARTMENT NAME]] before publishing.

**SPEAKING ENGAGEMENTS AND PUBLICATIONS POLICY**

Employee participation in external engagements

Employees may engage with external organizations in the following capacities:

*Personal interests and expertise*

Employees may accept invitations to speak or write on topics unrelated to their work or connected to their personal interests and expertise. In such cases:

* Employees must explicitly state that their views are their own and do not represent the company.
* Participation must not interfere with their job responsibilities or conflict with company policies.

*Speaking as a company representative*

Employees must obtain written approval from the [Communications Department/[DEPARTMENT NAME]] before accepting invitations to represent the company or discuss its positions outside of their normal job duties. For approved engagements:

* The [Communications Department/[DEPARTMENT NAME]] must pre-approve the content of any presentations.
* Employees must retain a complete copy of their presentations to document the material disclosed.
* Presentations should only include information related to the employee's area of responsibility and already available in the public domain.
* All content must comply with company policies, brand standards, and this policy.

*Professional participation in conferences or publications*

Employees may contribute to conferences, events, or publications in their private capacity when topics relate to their professional experience. In these cases:

* Employees should avoid engagements that could harm the company’s reputation.
* Such activities should not be planned or conducted during work hours or use company resources unless explicitly approved in writing by the [Communications Department/[DEPARTMENT NAME]].
* Content should be limited to publicly available information and within the employee’s expertise.
* Employees must decline compensation for engagements if it creates a conflict of interest as outlined in company policies.

*Providing personal views on work-related topics*

When sharing personal views on work-related activities or company-related issues:

* Employees must clarify that they are speaking or writing on their own behalf and not as representatives of the company.
* Statements and opinions should be clearly attributed to the individual, not the company.
* Employees should avoid any language that could be misinterpreted as the company’s official position or policy.

**CRISIS COMMUNICATION PROTOCOL**

Handling crisis situations

Despite proactive measures to safeguard the company’s reputation, unforeseen events may arise that negatively impact public perception. Crisis situations may jeopardize the company’s relationships with stakeholders, such as customers, business partners, employees, and the general public, or harm the company’s reputation, financial standing, and other critical interests.

Responsibility for crisis communications

The [Communications Department/[DEPARTMENT NAME]], in collaboration with [the Legal Department and] relevant internal teams, is responsible for:

* Developing and approving all communication materials related to the crisis.
* Managing the situation proactively, transparently, and in alignment with the company’s core values and policies.

Reporting and co-ordination

In the event of a crisis:

* Immediately report the situation to [the company’s Emergency Hotline/[CONTACT PERSON]] at [TELEPHONE NUMBER/EMAIL].
* Employees must refrain from engaging in external communications regarding the crisis without prior authorization.

Superseding guidelines

During a crisis, the company’s [Crisis Management Plan/[POLICY NAME]] takes precedence over standard communication policies. This ensures a unified response and minimizes risks associated with inconsistent or unauthorized information sharing.

Employees are reminded that only designated representatives may address external parties regarding a crisis. For additional guidance, contact [the Communications Department/[DEPARTMENT NAME]].

**POLITICAL STATEMENTS**

Personal political activities

Employees are encouraged to engage in political activities as private individuals. However, such participation must strictly occur on their own time, using personal resources, and without any implication of company involvement. The company’s [Political Activity Policy/[POLICY NAME]] governs these activities to maintain a clear distinction between employees’ personal political beliefs and the company’s stance.

Prohibited activities

To ensure clarity and protect the company’s neutrality, employees must not:

*Misrepresent personal views as company endorsement*

Avoid any action that implies or suggests that the employee's personal political views or positions are endorsed or supported by the company. Examples of prohibited actions include:

* Using company stationery, email accounts, telephones, computers, printers, or copiers for personal political activities.
* Sharing company mailing lists, customer databases, employee contact lists, or office space with political candidates or organizations.
* Posting hyperlinks to political websites, social media pages, or email accounts on company-owned platforms or accounts.

*Associate employment with political causes*

Employees must not use their employment by the company as a means to support or oppose political candidates, issues, or causes.

This includes refraining from citing their company role in political endorsements or debates.

*Authorized political representation*

Only employees whose roles explicitly involve representing the company on political matters are authorized to do so. Unauthorized representation or statements on behalf of the company are strictly prohibited.

For questions or clarifications regarding political activities, employees are encouraged to consult the [DEPARTMENT NAME] Department or refer to the company’s [Political Activity Policy/[POLICY NAME]].

**GUIDELINES FOR PUBLIC ENDORSEMENTS**

Overview of endorsement policy

Requests for public endorsements from external parties must be carefully evaluated to protect the company’s reputation and maintain strategic alignment. Employees must forward all such requests to [the Communications Department/[DEPARTMENT NAME]] for review and approval.

Conditions for endorsement approval

Endorsements will only be approved if the following criteria are met:

*Strategic value*

* The endorsement provides meaningful strategic benefits to the company, such as enhancing its reputation, strengthening business relationships, or advancing organizational goals.

*Positive relationship*

* The company has a solid and satisfactory relationship with the external party, their products, or services.
* The relationship is expected to remain positive and productive in the foreseeable future.

*Conflict avoidance*

* The endorsement does not create conflicts with existing customers, partners, or other stakeholders.

*Collaborative planning*

* The external party agrees to collaborate with the Communications Department to define the press release’s content and scope.
* A clear plan for distributing the information externally must be established.

Final review and planning

The Communications Department must review and approve the final design and text of the press release or public statement before publication.

Right to revoke approval

The Communications Department reserves the right to withdraw its approval of any endorsement at any time, particularly if circumstances change or the endorsement no longer aligns with the company’s interests.

Employee responsibilities

Employees approached for endorsements must:

* Direct all requests to the Communications Department.
* Refrain from making commitments or issuing statements on behalf of the company without prior approval.

For further clarification or guidance regarding public endorsements, please contact the [DEPARTMENT NAME] Department.

**GUIDELINES FOR COMMUNICATING WITH INTEGRITY**

Purpose of communication principles

To uphold the company’s reputation and values, employees are expected to follow these common-sense principles for external communication. These guidelines reinforce the "duty of loyalty" owed to the company and aim to ensure communications are conducted effectively, responsibly, and in the best interest of the organization.

Core expectations for communication

Employees act as representatives and ambassadors of the company and should avoid statements or actions that could harm the company’s reputation. This includes refraining from illegal or offensive behavior, such as:

* Ethnic slurs, sexist or discriminatory comments.
* Profanity, abusive language, or obscenity.
* Maliciously false statements.

Employees should embody the company’s core values, [LIST OF CORE VALUES], in all communications to reflect the integrity of the brand.

Key principles for integrity in communication

*Be transparent*

* Clearly acknowledge your affiliation with the company when speaking publicly or posting about work-related matters.
* If you are not an Authorized Spokesperson, clarify that your statements reflect your personal views, not the company’s official position.

*Be accurate*

* Share only accurate, complete, and factual information.
* Avoid speculation or making statements that could be misinterpreted as fact.
* Correct errors promptly and visibly if they occur.

*Be respectful*

* Protect the privacy of colleagues, customers, and stakeholders.
* Avoid sharing or posting anything offensive, including sexual remarks, racial slurs, or inflammatory statements about religion or politics.

*Be compliant*

Adhere to all applicable company policies, procedures, and relevant laws, including those related to:

* Privacy.
* Conflict of interest.
* Copyright and intellectual property.
* Confidentiality and ethics.

Understand that you are legally accountable for public and online statements.

*Be approved*

* Obtain proper authorization before speaking or posting on behalf of the company.
* Share only pre-approved information that aligns with the company’s official position or views.

**HANDLING CONFIDENTIAL INFORMATION**

Safeguarding company information

Employees are required to adhere to the company's [Confidential Information Policy/[POLICY OR AGREEMENT NAME]], which governs the use and protection of the company’s trade secrets, intellectual property, and other confidential information. This policy ensures the proper handling of sensitive information and minimizes the risk of unintended disclosures.

Protecting confidential and proprietary data

Employees must treat the company’s trade secrets, intellectual property, and proprietary information—such as [SPECIFIC ITEMS TO BE TREATED AS CONFIDENTIAL, e.g., customer data, product designs, pricing strategies]—as strictly confidential. When communicating with external parties:

* Do not disclose confidential information, either intentionally or inadvertently.
* Exercise care to avoid actions that could jeopardize or expose sensitive data.

Avoid third-party misuse

Employees should also avoid misappropriating or infringing on the intellectual property of other companies or individuals. Such actions may result in legal liability for both the employee and the company. Employees should consult the [Legal Department/[DEPARTMENT NAME]] if unsure about whether certain materials or information can be used in external communications.

**POLICY ENFORCEMENT AND PROTECTION AGAINST RETALIATION**

Disciplinary actions for policy violations

All employees, regardless of their position or title, are required to comply with the provisions outlined in this policy. Violations of this policy will result in disciplinary action, which may include measures up to and including termination of employment. Such actions are taken to uphold the integrity of the company's communications and protect its reputation.

Reporting violations

Employees who become aware of an actual or potential violation of this policy [must/should/are encouraged to] report the matter immediately. Reports can be directed to:

* [Your direct supervisor.]
* The [Communications Department/Legal Department/[DEPARTMENT NAME.]]
* [A designated individual, e.g., the Compliance Officer or HR representative.]

Timely reporting ensures that any issues can be addressed proactively and appropriately.

Non-retaliation assurance

The company strictly prohibits any form of retaliation against employees who, in good faith, report violations or cooperate in an investigation related to this policy. Retaliatory actions, such as discipline, intimidation, or reprisal, will not be tolerated. Employees who believe they have experienced retaliation are encouraged to report the matter to the [Communications Department/Legal Department/[DEPARTMENT NAME]] for investigation and resolution.

**POLICY ADMINISTRATION**

The company reserves the right to amend, modify, or revoke any provisions of this policy at its sole discretion and without prior notice. Employees are expected to stay informed of updates and adhere to the most current version of this policy.

The [Communications Department/Legal Department/[DEPARTMENT NAME]] is responsible for the administration, implementation, and periodic review of this policy. This includes ensuring its alignment with company objectives and compliance with applicable laws and regulations. Updates to this policy will be made as necessary to reflect changes in legal requirements, industry practices, or company operations.

All employees are responsible for consulting and following the latest version of this policy. Employees with questions, concerns, or who require clarification regarding any aspect of this policy are encouraged to contact the [Communications Department/Legal Department/[DEPARTMENT NAME]] for guidance.

**ACKNOWLEDGEMENT OF RECEIPT AND REVIEW**

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (employee name), acknowledge that on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (date), I received and reviewed a copy of [EMPLOYER'S NAME]’s [NAME OF POLICY]. I understand that it is my responsibility to familiarize myself with the policy and adhere to its terms.

I also acknowledge that this policy is not intended to create an employment contract or alter my at-will employment status, unless otherwise specified in a written agreement signed by an authorized representative of [EMPLOYER'S NAME]. Any delay or failure by [EMPLOYER'S NAME] to enforce the provisions of this policy does not constitute a waiver of its rights to enforce them in the future.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Printed Name

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date