

Social Media Policy

Document Number: BE-02110
Revision Level: B

## 1 Scope and Purpose

With the popularity of social media, the way Benchmark Electronics, Inc. (the "Company") and its employees communicate and interact must consider various responsibilities and risks. Accordingly, employees are expected to be respectful and professional when using social media. We expect our employees to exercise sound judgment in their communications relating to the Company to effectively safeguard the Company's reputation and interests. Social media use can result in a range of problems if improperly used, such as disclosure of sensitive or confidential information, copyright violations, as well as damage to the Company's reputation, to name just a few.

To assist employees in making responsible decisions about the use of social media, the Company has established these guidelines for appropriate use of social media. If employees do not follow the principles defined in this policy when engaging in social media, they could face serious consequences, up to termination in accordance with the laws where they are employed. Therefore, employees must read and understand this policy.

This policy applies to all Company employees and contractors, any other person who is notified that this policy applies to them, and employees or contractors at the Company's wholly-owned subsidiaries. This includes employees authorized to represent the Company on social media platforms and employees who choose to make references to the Company when using social media in a personal capacity.

This policy applies to all types of social media accessed by Company employees using Company computers, mobile devices, or other technology. It also applies to those employees using non-Company technology that is not linked to the Company's systems if such social media use references the Company or Company related matters or is related to the Company's business.

In all cases, use of the Company's Information Technology (IT) systems for social media use must comply with the Company's IT policies.

Any employee who participates in social media, for any reason, is responsible for reading, understanding, and complying with the social media provider's or Internet site's terms of use.

#### 2 References

BE-00007 Securities Trading Policy

BE-00200 Att 1 Code of Conduct

BE-02108 Bring Your Own Device Policy

BE-03002 Electronic Resources and Data Security Policy

BE-03004 Corporate IT Security Policy

BE-03015 IT Code of Conduct

#### 3 Definitions

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Per Global Record, Benchmark Glossary



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### 4 Requirements

#### 4.1 Know and Follow the Rules

All information contained within this document is subject to any applicable country, state, and/or local laws. Company employees must comply with all local social media legal requirements, and the Company may choose to adopt regional or country-specific social media policies as necessary. The Company's basic employment policies provide the foundations for its policies on social media. All Company employees are subject to the Company's Code of Conduct in every public setting. In addition, other policies, including the Securities Trading Policy, govern employee behavior concerning the disclosure of information. Carefully read these guidelines and the Company's Employee Handbook and other Information Systems Policies, and ensure any postings that concern, are related to, or could be attributed to the Company are consistent with these policies.

These policies apply to employees' activities online, as the same principles and rules that apply to company employees' activities in general also apply to online communication. Before participating in social media, employees should re-familiarize themselves with these principles and rules.

#### 4.2 Use Good Judgment

As a global company, we have a legal responsibility to maintain a workplace free of unlawful harassment, a substantial interest in preventing violence, and an interest in avoiding unnecessary conflict or a toxic work environment that could interfere with productivity and other legitimate Company goals. It is important to always keep in mind that social media is not contained to geographic boundaries. Content that may be acceptable in some regions may be offensive in others. The Company's clients/customers do not view the Company as a group of separate companies. What is said in one region can have an impact on the Company elsewhere.

When posting content on social media, use the same judgment applied in writing any formal communications. Please make sure the social media profile and related content are consistent with presenting oneself professionally.

Employees must not take any position on the Company's behalf and should not disclose sensitive proprietary and/or confidential information about the Company.

With the exception of skill endorsements on LinkedIn, employees should not use social media to provide references about employees or former employees consistent with the Company's protocols outlined in the Company's Employee Handbook.

Furthermore, employees must not conduct Company business with a customer or vendor via a blog or other social media site. If a customer or vendor initiates contact about a work-related matter through these tools, the conversation should be transitioned to a telephone call or work e-mail because of privacy, confidentiality, and document preservation concerns. This should be done by stating, "Due to privacy and confidentiality concerns, Company personnel cannot discuss Company matters on social media sites."



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Employees should use spell check and proofread work. Relying on spell check to be a proofreader may result in unexpected errors.

# 4.3 Be Respectful and Avoid Harassment, Discrimination, and Threats of Retaliation

Acknowledging that employees may wish to engage in social networking while off duty, this policy sets forth rules and guidelines to ensure that Company personnel communicate through social media according to the same Company standards and policies that otherwise apply to them that strictly prohibits discrimination, harassment, bullying, and threats of retaliation. Thus, employees are expected to observe the following rules and guidelines when social networking:

Employees should always be fair and courteous to fellow employees and those who work on the Company's behalf. Also, work-related complaints can best be resolved by speaking directly with coworkers or contacting Human Resources rather than posting complaints to a social media outlet. Employees must avoid using statements using photographs, video, or audio that reasonably could be viewed as malicious, obscene, threatening, or intimidating, that disparage coworkers or customers, that reveal Company sensitive or confidential information, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm the Company or someone's reputation or posts that could contribute to a hostile work environment based on race, sex, sexual orientation, age, disability, religion, or any other status protected by applicable law or the Company's policies. Refer to the Company's Information Systems Policies and Employee Handbook for more information.

Inappropriate postings of such nature will not be tolerated and may subject employees to corrective action, up to and including termination.

The Company 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 someone for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to corrective action, up to and including termination.

#### 4.4 Be Honest and Accurate

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Employees must make sure they are always honest and accurate when posting information or news, and mistakes should be corrected quickly. Altered posts should be clearly identified. The Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors about the Company, its partners or employees, or the Company's customers or competitors known to be false.

If an employee makes an error or accidentally posts inaccurate information, the employee should be upfront about the mistake, correct it quickly, and move on. If the employee



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chooses to modify or edit an earlier post or comment, clarify that it has been modified. If an inaccuracy is pointed out, it should be investigated, and if it is inaccurate, the mistake should be fixed.

#### 4.5 Protecting All Confidential Information

Social media encourages you to share information and connect with people. When you use social media, you should try and build relationships. Still, you should also be aware that through your relationship with Company, you may have access to sensitive proprietary and/or confidential information that should not be made public (e.g., unannounced product launches and promotions, internal sales results, company strategy, pricing information or comparisons). Therefore, employees must not share sensitive proprietary and/or confidential Company information or any customers' confidential information.

#### 4.6 Intellectual Property

The Company expects employees to show respect for the laws, governing copyright, fair use of copyrighted material owned by others, trademarks, and other intellectual property, including the Company's copyrights, trademarks, and brands.

#### 4.7 Referencing Colleagues

Employees may not knowingly use the identity of another Company-employee. Personal blogs and websites may not be used to attack or abuse colleagues. Such behavior may amount to cyber-bullying and could be deemed a disciplinary offense. Employees should respect the privacy and feelings of others.

In addition, employees must be considerate of their colleagues and not post personal information without permission. Employees should not post photos, videos, or other media on any social media site without the consent of all those portrayed in such media. Employees should also not tag, identify, or comment on anyone on social media without that person's consent. Remove any information about a colleague if that colleague asks you to do so.

#### 4.8 Protect Customer Confidentiality

Customer-specific information may not be included in a posting unless advance written approval is obtained from the customer and the Company's Marketing department.

#### 4.9 Using Social Media at Work

Any non-business use of social media during work hours should be incidental, occasional, and reasonable by the Company's standards. Employees should discuss with their manager whether and when it is appropriate for them to participate in social media during their work hours. Similarly, employees should ensure that their manager is aware of any social media activities that may be related to the Company's business, particularly if they are not authorized to speak on behalf of the Company. Use of the Company's IT systems to access social media sites in accordance with this policy is permitted, where it is not blocked locally. However, employees' online activities should



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be limited and should not interfere with their job and commitments to customers or interfere with or impact normal business operations of the Company. Such use must comply with all Company policies, including all other provisions of this policy, must not compromise the security or reputation of the Company, or burden the Company with unreasonable incremental costs. Personal blogging should be done on the employee's own time. You are encouraged to include the following disclaimer in your social media profiles: "The views expressed here are mine and may not reflect the position of my employer." The Company's computer hardware and software are to be used for business purposes and are not private. These activities may be monitored. See the Company's Information Systems Policies.

#### 4.10 Media Contact

Employees must not speak to the news media on the Company's behalf without approval from the Vice President, Marketing or the Senior Vice President, Investor Relations. In response to any media inquiry regarding the Company, employees should take the name of the media organization and direct the inquiry to the Vice President, Marketing or the Senior Vice President, Investor Relations. Employees are prohibited from engaging legal parties, financial analysts, or industry analysts to discuss any matters relating to company strategy or business unless explicitly authorized to do so by the Company

#### 4.11 Questions

If there are any questions about acceptable social media usage, employees should contact Human Resources.

# 5 Discipline and Consequences for Non-Compliance

All employees must comply with the Company's Social Media Policy and any other applicable policies. Deviations from or non-compliance with this policy, including attempts to circumvent the policy, may result in corrective actions, up to and including termination, in accordance with federal, state, and local laws.



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# Corporate Policy and Procedure Social Media Policy

**Document Number:** BE-02110 Revision Level: В

**Revision History** 

Date	Rev	Reason for Change:	ECO Number:
10/28/2021	В	Edited for clarity, updated references to other policies, and ensured alignment with current laws and the company's position on social media use by employees.	CORP004661
03/14/2019	Α	Initial release.	CORP004159