

Social Media

Policy Owner	Brightspeed Communications
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Effective Date	September 7, 2023
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1 SCOPE

This policy applies to all Brightspeed employees when their business or personal use of internal or external social media channels impacts Brightspeed, its customers, business partners or employees. If it conflicts with any applicable local law or collective bargaining agreement, the local law or collective bargaining agreement will govern and apply.

“Social media” is any tool or service that facilitates conversation or sharing of text, photos, audio, video, and other information among groups of people via the Internet or intranet – externally or internally. Employees who are unsure of whether use of a communication platform is covered by this policy should contact the Brightspeed Communications Team at pr@brightspeed.com.

2 BRIGHTSPEED ACCOUNTS

Access to Brightspeed social media pages is managed by the corporate social media team.

3 GUIDELINES

Follow these rules when engaging in any social media activities:

A. Understand how the Brightspeed Code of Conduct and other company policies affect your use of social media internally or externally.

- Designated team members are authorized to speak on behalf of the company for traditional, digital and social media. They will communicate the company’s messaging in the marketplace. Employees should not respond on behalf of the company to the media or on social media platforms. Please refer media inquiries to pr@brightspeed.com if a reporter or news outlet reaches out directly.
- Interaction with members of the investment community is governed by authorized members of Brightspeed’s Finance team. Other employees may not discuss Brightspeed’s current or future financial performance, confidential business plans or any other matter that could impact Brightspeed’s valuation or competitive position on any social media platform.

- B. **Protect and respect.** Comments made online are permanent (screen shots last forever) and forwardable. Respect your audience and use good judgment.
- Protect yourself. Postings should comply with local laws, the guidelines included in this policy, and the specific terms and conditions for each social media platform you use.
 - Protect and respect confidential and proprietary information about the company, customers, and employees. Never share confidential information in your social media posts and ensure that any photos you share are free of proprietary information (e.g., images that contain computer screens that reveal confidential information in the background, pictures of documents, your employee ID, etc.). If you have questions about whether a proposed post contains confidential information, please contact pr@brightspeed.com.
 - Protect Brightspeed property, copyrights, logos, images, video, and trademarks. For guidelines on how to use the Brightspeed brand, visit the brand center.
 - Just because you can see information online doesn't mean you can re-post it or use it. Online text, video and images may be protected by copyright or trademark or owned by someone else.
 - If you see a post or comment on a social media site that you believe might need an official Brightspeed response or that you want to be sure the company has visibility to, send an email to pr@Brightspeed.com.
- C. **Remember:** Violating company policies, whether communicating in person or online, can cause problems for you and/or the company. If posts, images, video, etc. have an impact on our employees, our customers, or our brand, they will be reviewed. For example, if you post a slur about a co-worker on your Facebook page, that could affect the work environment. We'll look into it. If you tweet or post customer or confidential information that mentions the company or if you violate any of our policies, we'll look into that too. Finally, we reserve the right to investigate the identity of a blogger using our channels anonymously or under a pseudonym.
- D. **Be a smart ambassador.** Social media can bring significant benefits to Brightspeed, and you can help build the company's reputation as an employer of choice and promote our company culture through social media. If you choose to post or comment about Brightspeed on external social media, please follow these additional rules:
- If you are liking, sharing or commenting on a post from an official Brightspeed channel (LinkedIn, Instagram, etc.): Thank you! Our employees are our best ambassadors. In

general, simply liking or sharing posts from official Brightspeed accounts will not require any additional action from you.

- However, likes and shares are considered endorsements, so remember:
 - If you tag, like, pin, repost or share Brightspeed-related posts, you should disclose your employment if your employment relationship would impact the audience's understanding of the original post.
 - For example, if you like or share a post about free Brightspeed swag that was provided to employees, you should disclose your relationship to Brightspeed (unless the post makes clear that the swag was available only to employees).
 - If you add your own content when sharing/liking a post that discusses Brightspeed's products or services, you must clearly and prominently disclose your affiliation with Brightspeed in each post so readers are aware.
 - For example: "I'm excited to share that my company just announced that we now provide service to XYX town"). A reference to "my company" or "my employer" is sufficient. A reference to Brightspeed in your bio or another post is not. You can also use the hashtag #wearebrightspeed. Please tag Brightspeed on the social media platform (LinkedIn: @brightspeed; Facebook, Instagram, Twitter/X: @gobrightspeed) to make the Social Media team aware of your post.
- If you are creating your own post about Brightspeed on your own social media accounts, you must **clearly and prominently disclose** your affiliation with Brightspeed in **each** post so readers are aware:
 - You must actively reference "my company" or "my employer" or prominently place the hashtag #wearebrightspeed. Just having Brightspeed in your bio isn't enough.
 - Please also tag Brightspeed on the social media platform to make the Social Media team aware of your post.
- Exercise caution when interacting with Brightspeed or industry-related social posts that are NOT from Brightspeed's official social media accounts. These accounts may contain false or unverified information and your "like," "share" or "repost" is considered an endorsement of that information.
 - Example: You "like" a post that contains unverified information about a potential investor or possible Brightspeed IPO. Because you're an employee, your social media

audience may reasonably assume that you have inside information and view your “like” as confirmation.

- If you have any questions about when and how to disclose your employee status on social media, please contact pr@Brightspeed.com

E. When engaging on **any** social media platform, **things to do**:

- **Be honest:** Only share your actual experiences and thoughts about Brightspeed’s products and services. You must be a bona fide user of any product or service you’re endorsing, so don’t make claims about products or services you’re unfamiliar with. Additionally, don’t make up claims about a product that would require substantiation that is confidential or that Brightspeed doesn’t have (for example, a claim that Brightspeed is installing fiber on Mars).
- **State that your comments/posts are your opinion:** When commenting on industry or Brightspeed related issues, products or services, state that the views expressed are your own views and not those of Brightspeed and follow the below “things to avoid” guidelines.
- **Be polite and respectful:** Even though you speak for yourself, your social media presence reflects on Brightspeed as a company. Comments should always be consistent with Brightspeed’s Code of Conduct and core beliefs.

F. When engaging on any social media platform, **things to avoid**:

- **Interacting with customers who are complaining or commenting about Brightspeed:** Never engage directly with customers on social media. Designated team members are responsible for replying to customers who comment, ask questions, or report service issues on social media, though the response may not be made public. Our team of experts has it handled.
- **Disclosing confidential or proprietary information:** Confidentiality policies and laws always apply. Additionally, Brightspeed’s Code of Conduct applies to your activity on social media.
- **Speaking on matters outside of your field of expertise:** Company strategy and industry issues that affect the company should not be discussed externally by anyone other than the company’s executive leaders.
- **Making false or disparaging comments:** Brightspeed’s Code of Conduct applies to your activity on social media.

- **Profane, obscene, intimidating, harassing or hate-fueled language or content:** Even though you speak for yourself, your social media presence reflects on Brightspeed as a company.

G. When completing your personal social media profile:

- **Do not** use the Brightspeed company name as part of an account username or “handle” to avoid the appearance that it is an official company account. Not permitted: X (Twitter) handles such as @Brightspeed_JohnDoe, @JohnDatBrightspeed, @BrightspeedSalesGuy, etc.
- Feel free to use official company cover photos or approved company social media profile banners for the banner image on your LinkedIn and/or X (Twitter) profile. These can be found on [Brand Central](#). If you use these images:
 - Use them **ONLY** on your personal LinkedIn or X profiles. Do not use them on any other social media platform.
 - Remember, you are representing Brightspeed. Ensure all your posts/comments/participations are in good taste and judgment and adhere to the company’s beliefs.
- Include a disclaimer in your profile description that makes clear that you are not writing on behalf of Brightspeed, such as “Thoughts are my own, not my employer’s.”

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