

High Plains Farm Credit, ACA
Social Networking Guidelines
February, 2020

Purpose and Objectives

The use of social media to attract and interact with customers can impact an association's risk profile. The increased risks can include the risk of harm to consumer, compliance and legal risk, operational risk, and reputation risk. With this in mind, High Plains Farm Credit, ACA (HPFC) has elected to use social media.

HPFC realizes that there are risks and responsibilities in using social media. The association will utilize a social media monitoring tool to listen to and monitor online conversations, particularly those related to Farm Credit and our industry and participate as needed. Negative comments or complaints that arise within the many social media platforms will be evaluated for the appropriate response if any.

Responsibility/Accountability

HPFC is aware that employees' communications via social media may be viewed by the public as reflecting the financial institution's official policies or may otherwise reflect poorly on the financial institution, depending on the form and content of the communications. Employee communications can also subject the financial institution to compliance risk, operational risk, as well as reputation risk. Therefore, as appropriate, HPFC will address these risks with training to address employee participation in social media representing the financial institution. This training is not intended to impose any specific requirements for employee personal use of social media, only to educate employees on the association's policies and procedures. Employees are responsible for being familiar with related HPFC policies and procedures (in particular the Standards of Conduct Policy and those which address communications and information security) and applicable laws and guidelines, and applying them with regard to the appropriate usage guidelines of HPFC property, including computer equipment and business networks. Employees should be cognizant of their behavior and their "friends" behaviors on social media sites. This is especially true if they are "befriending" a customer. In most situations, it will not be the behavior of the employee, but that of those associated with them that might put HPFC in a negative light.

Employee Guidelines

In brief, our guidelines for engaging on the social Web consist of the following core principles:

1. Honest about who you are
2. Clarity that your opinions are your own
3. Respect and humility in all communication
4. Good judgment in sharing only public information – including Association financial data
5. Awareness that what you say is permanent

The AVP-Administration and VP-Marketing are responsible for monitoring online conversations.