

Social Media Policy

1.17.2014

I. Purpose:

The use of Social Media by Employee to further the business objectives of the Company is permissive and not a right. This permission may be revoked and or limited by the Company in its sole discretion. Company reserves the right to request that certain subjects be avoided; withdraw certain Content; correct errors in Content; and remove inappropriate comments.

The Employee agrees that Company shall take reasonable precautions to protect its brand, reputation, borrowers, potential borrowers, customers, clients, business associates and to determine to a reasonable extent, that the use of Social Media does not violate any applicable Federal and State rules and regulations as well as comply with all regulators.

The Company recognizes that Employee may use various Social Media in both personal as well as business situations. The Company does not seek to regulate the use of personal social media so long as the use remains personal.

The Policy is meant to provide an overview for the Employee to understand the requirements and responsibilities of using Social Media for purposes of furthering the business interests of the Company. This provides the Company as well as the Employee the parameters for use and to protect the Company as well as the Employee from actions that may create a regulatory problem for either party.

II. Definitions:

Content:

Created information designed to be widely disseminated through the use of Social Media. This includes, but not limited to, pictures, articles, videos, audio recordings, logos, words, movies, other links and all other types of information created. The definition is evolving and includes any other type of information which may be developed in the future.

Copy-written Material:

This consists of Content which is the legal property of another person or entity and not the Company or the Employee.

Posts, Posted, Posting:

The act of up-loading or attaching Content to Social Media Sites.

Regulations:

Including, but are not limited to: SAFE Act, Regulation N, (Mortgage Acts and Practices), Fair Lending Laws: Equal Credit Opportunity Act/Regulation B and Fair Housing Act; Truth in Lending Act/Regulation Z; Real Estate Settlement Procedures Act; Unfair, Deceptive, or Abusive Acts or Practices; CAN-SPAM Act and Telephone Consumer Protection Act; Children's Online Privacy Protection Act Fair Credit Reporting Act as well as other such laws and regulations enacted or promulgated to which the Company must comply. This list is not exhaustive but rather illustrative of the regulations to which the Company must comply.

Social Media:

For purposes of the Company's Social Media Policy, this is broadly interpreted as: interactive online communication in which users can generate and share content through text, images, audio, and/or video. Including, but not limited to, web sites, email addresses, micro-blogging sites (e.g., Facebook, Google Plus, MySpace, and Twitter); forums, blogs, customer review Web sites and bulletin boards (e.g., Yelp); photo and video sites (e.g., Flickr and YouTube); sites that enable professional networking (e.g., LinkedIn);

virtual worlds (e.g., Second Life); and social games (e.g., FarmVille and CityVille), as well as individual Web sites and or pages on Company's web site.

The definition is evolving and shall include all definitions by the Consumer Financial Protection Bureau (CFPB) and Federal Financial Institutions Examination Council (FFIEC) as well as all other applicable State and Federal regulators.

III. Obligations of the Employee:

Think Before Posting (TBP);

In general, Employee should think carefully before posting, because most online social platforms are open for all to see. Despite privacy policies, Employee cannot always be sure who will view, share or archive the information that is posted. Before posting anything, Employee should remember that he/she is responsible for what is posted online. Employee should carefully consider the risks and rewards with respect to each posting. Employee should remember that any conduct, online or otherwise, that negatively or adversely impacts the Employee's job performance or conduct, the job performance or conduct of other co-workers or adversely affects potential borrowers, borrowers, colleagues or associates of Company or Company's legitimate business interests may result in disciplinary action, up to and including termination. If Employee has any doubt about what to post online, it is probably better not to post, since once something is placed in cyberspace, it is often difficult to retract. Employee should use his/her best judgment and exercise personal responsibility when posting to any social media websites.

Read, review and comply:

The Employee has read, reviewed and will comply with all policies of the Company that apply to the use of Social Media.

Disclosure:

The Employee has an affirmative obligation to notify and disclose to Company the following:

- All Social Media sites used for business and personal use;
- All email addresses identified as either personal or business use;
- All web sites used for business and personal use;

Email Protocol:

- Only approved Company email accounts may be used for business purposes;
- The signature block must contain:
 - *Proper title as provided by Company;*
 - *Official name as provided to Company and NMLS (if appropriate);*
 - *NMLS number (if appropriate);*
 - *Licensed contact location;*
 - *Licensed business phone;*
 - *Additional State licensing language as appropriate;*
 - *Additional Federal licensing language as appropriate;*
 - *Additional Company language as provided;*
 - *Colors, look and Company logo either provided by Company or approved.*
- There shall be no use of personal email accounts for business purposes.

Content:

That all Content posted by Employee in furtherance of the business interests of Company:

- Shall be on social media sites listed as business and not personal;
- Shall be either original and developed by the Employee, provided by Company, or legally used or obtained by Employee;
- Shall not be discriminatory, based upon sex, age, race, national origin, ethnicity, religion, sexual orientation, disability or any other such federally or state protected class and/or violate any policy of the Company;
- Shall not be in violation of any federal, or state rule, Regulation (as defined above) and or policy of Company;

- Shall respect copyright, privacy, fair use, financial disclosure, and other applicable laws;
- Shall not claim nor imply that Employee is speaking on the Company's behalf;
- Shall provide that any comments by Employee on any aspect of the Company's business are clearly identified by an employee and include the disclaimer: "the views expressed are mine alone and do not necessarily reflect the views of (Company)."
- Shall clearly identify the Employee with his/her name and title as provided by or to the Company;

Links/Information Groups:

That Employee shall not link to nor join any Group which purpose or business violates the Company's Social Media policy. All such links and or Groups must have a clear business purpose and further the business interests of the Company.

Ownership:

All business-related social media accounts and related Content posted by Employee shall remain the property of Company and that all information including the account, the login and password should be returned to Company at the end of the Employee's employment and Employee shall not use the account after termination of employment and only Company is permitted to change the account names and settings.

Inspection of Use of Social Media:

The Company shall periodically inspect Employee's use of Social Media as set forth in Section IV herein and Employee specifically agrees to:

- Comply with all inspection requests made by Company;
- Disclose knowledge of any problems;
- Correct or remove any Posts as directed by Company;
- Acknowledge receipt of any written report.

Prior Approval of Content:

That Company, in its sole discretion, may require that Content be reviewed for compliance prior to posting by Employee and that Employee agrees to obtain prior approval.

IV. Review of Employee Compliance with Social Media Policy

The Company shall review the use of Social Media by Employee on a random basis at its sole discretion. This inspection may consist of automated and or manual systems. The Company shall collect and review Content posted by Employee as well as all Social Media use as defined above to determine compliance by Employee to the Company's Social Media Policy.

The Company shall provide a written report including a grade based upon the following criteria:

Grade of "A":

An Employee in this category is in a strong compliance position. There are no major issues regarding use of Social Media. The Employee has disclosed all social media sites used, and is not using personal sites for business purposes. All posts are within both Company compliance requirements as well as all state/federal regulations.

Grade of "B":

An Employee in this category is in a generally strong compliance position. There are some violations of company policies/procedures or state/federal rules/regulations. These violations however, involve technical aspects of the law or result from Employee oversight. There is no evidence of active deception and or potential additional violations, or practices resulting in repeat violations. Compliance training is satisfactory.

Grade of "C":

An Employee in this category is in need of strong supervisory attention and discipline. There are numerous violations of Company policies/procedures or state/federal rules/regulations. These violations result from either reckless disregard or are intentional. There is evidence of active deception and or potential

additional violations, or practices resulting in repeat violations. In addition, previously identified practices resulting in violations may remain uncorrected. The Employee is substantially in noncompliance with the Social Media Policy and other company policies and has demonstrated an unwillingness or inability to operate within the scope of these policies. There are no consumer complaints, or possible refunds required to consumers. There are no currently active negative issues regarding the reputation of the Company and there are no requirements for disclosures to regulators. Discipline is recommended.

Grade of “D”:

An Employee in this category is in need of the strongest supervisory attention and discipline. There are numerous violations of company policies/procedures or state/federal rules/regulations. These violations result from either reckless disregard or are intentional. There is evidence of active deception and or potential additional violations, or practices resulting in repeat violations. In addition, previously identified practices resulting in violations may remain uncorrected. The Employee is substantially in noncompliance with the Social Media Policy and other company policies and has demonstrated an unwillingness or inability to operate within the scope of these policies. There is strong possibility and or commencement of consumer complaints and or refunds required to consumers. There is a concern regarding the reputation of the Company and/or actions have commenced which could result in harm to said reputation. Actions by Employee require disclosure to appropriate Regulators. Termination/suspension is recommended.

I agree to the terms and conditions as listed:

(Company) (Date) (Employee) (Date)