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Corporate Governance

SOCIAL MEDIA POLICY

Version 2.0
April 25, 2022

SENSITIVITY CLASSIFICATION: [Confidential]

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Revision History

Revision Number	Revision Date	Nature of Revision	Approved By
0	May 31, 2016	Initial Release	Board of Directors
1	April 25, 2022	First Revision	Board of Directors

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Approval Sheet

We have reviewed the contents of this document described as **Social Media Policy** and hereby approve its implementation effective April 25, 2022.

Signed by:

Sgd. ATTY. RAY C. ESPINOSA

President and CEO

Endorsed by NOMINATION AND GOVERNANCE COMMITTEE:

Sgd. Mr. PEDRO EMILIO O. ROXAS

Chairman

Approved by BOARD OF DIRECTORS:

Sgd. Mr. MANUEL V. PANGILINAN

Chairman

Prepared by:

Corporate Governance

Assisted by:

Public Relations

Marketing- Social Media

Data Privacy Office

Legal

Regulatory Management

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1. General Statement of Policy

Manila Electric Company (“MERALCO” or the “Company”) recognizes the right of its Directors, Officers, Employees, and Third-Party Business Partners, to privacy, and to freedom of speech and of expression in whatever form or medium as they may deem fit. The Company likewise acknowledges the value of social media as an effective communication tool through which it may maintain or strengthen business goodwill or foster relationship with various stakeholders such as customers, employees, stockholders, and the public in general. However, when used inappropriately, social media may cause irreparable harm to the reputation or goodwill of the Company, or to the reputation of its Directors, Officers, Employees or Third-Party Business Partners, and may even result in violation of existing laws or regulations.

Accordingly, in the use of social media platforms, all Directors, Officers, Employees, and pertinent Third-Party Business Partners should exercise reasonable care and sound judgment before posting any content and/or commentary. They should also strictly comply with the Company’s disclosure rules and procedures and internal controls requirements, and not knowingly misrepresent, or cause others to misrepresent, facts or information about the Company and its business to others, whether internally or externally.

2. Scope

- 2.1 This Policy shall apply to all members of the Board of Directors (each a “Director” and collectively, the “Directors”), Officers (each, an “Officer” and collectively, the “Officers”), and Employees (each, an “Employee” and collectively, the “Employees”) of MERALCO. The Policy shall also apply to Third-Party Business Partners who represent the Company to the public or act for or on its behalf in a manner that creates legally binding obligations between the Company and third parties.
- 2.2 The Policy shall cover official or work-related social media usage where Directors, Officers and Employees as well as Third-Party Business Partners share information or post statements on behalf of the Company or its subsidiaries and affiliates as part of their duties and responsibilities as such. This shall also apply to unofficial or personal social media usage to the extent that the social media content shared or posted relates to the business, data, or reputation of the Company or its subsidiaries and affiliates or insofar as such content involves the Company in general, its Directors, Officers, and Employees in their capacities as such or Third-Party Business Partners insofar as they represent the Company.

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3. Definition of Terms

- 3.1 Confidential or Proprietary Information¹** shall include, but shall not be limited to, any and all trade secrets and any other information, methods, processes, formulae, systems, business, technical, marketing, computer, and administrative records, including customer information, plans, software, and other data developed, created, acquired, or maintained by the Company. Confidential information includes any non-public information that, if disclosed, might be of use to competitors, or harmful to the Company, its subsidiaries, affiliates, customers, or other third-party business partners
- 3.2 Consultants** include professional consultants, advisors, firms, partnerships, counsels, or such other professional entities or individuals rendering professional or specialized expert services to the Company as well as advisors of the Company who may be appointed by the Board of Directors or management
- 3.3 Material non-public information** refers to any information which (a) has not been generally disclosed to the public and would likely affect the market price of the security of the Company after being disseminated to the public and the lapse of a reasonable time for the market to absorb the information; or (b) would be considered by a reasonable person important under the circumstances in determining his course of action whether to buy, sell or hold a security.
- 3.4 Personal Data** refers to any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual. For purposes of this Policy, Personal Information shall cover information in the custody of and obtained by the Company within the scope of the Company's business objectives, such as, but not limited to, name, address, email address, phone number, race, nationality, ethnicity, religion or associations, age, sex, marital status, information on education, health, financial, or employment history.
- 3.5 Social Media** pertains to engagement in Internet-based social platforms that are visible to others including but not limited to various online tools, applications, and sites where users are able to generate files, share content, join networks or promote advocacies, brands or causes.
- 3.6 Social Media Content** refers to any content created by individuals, companies, or other entities, and are posted in social media, including but not limited to data,

¹ Shall also include internal memoranda or presentation materials not intended for external distribution or reproduction (e.g., appointment letter, organizational structure, employee compensation and other memos of this nature released by Human Resources and Internal Communications)

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text, sounds, images, graphics, music, photographs, or advertisements, including video, streaming content, webcasts, podcasts, blogs, online forums, and chat rooms.

- 3.7 **Directors** pertain to the members of the Board of Directors of the Company.
- 3.8 **Officers** refer to employees with the rank of Vice President and up who are appointed by the Board of Directors of the Company.
- 3.9 **Employees** pertain to all persons other than Officers, under the employ and in active payroll of the Company, including temporary, and probationary employees.
- 3.10 **Third-Party Business Partner** pertains to individual, entity, organization and/or their representatives, including MERALCO's subsidiaries or affiliates, who represent the Company to the public or act for or on its behalf in a manner that creates legally binding obligations between the Company and third parties. This shall include but is not limited to prospective or existing supplier, contractor, consultant, buyer, content provider, media agency or dealer.

4. Standards

4.1 Confidentiality of Information and Proper Use of Company Property

- 4.1.1 Processing of information pertaining to, or in the possession of, the Company shall strictly comply with applicable laws such as the Philippine Data Privacy Act (R.A. 10173) and its implementing rules and regulations, Distribution Services and Open Access Rules (DSOAR) and other related laws, rules and regulations, as well as internal policies, standards, and procedures such as information security and insider trading policies.
 - 4.1.1.1 Directors, Officers, or Employees shall safeguard the confidentiality of personal or proprietary information entrusted by the Company, its subsidiaries, affiliates, customers, or other Third-Party Business Partners with which the Company relates, except when disclosure is authorized or legally mandated.
 - 4.1.1.2 This confidentiality obligation shall be perpetual and therefore, shall survive the separation from the Company of its Directors, Officers, or Employees due to retirement, resignation, termination of employment or engagement, or its Third-Party Business Partners due to expiration or termination of contract, or any other cause.
- 4.1.2 Directors, Officers, or Employees shall not take undue advantage of material non-public information by dealing in the securities of MERALCO

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while in possession of such information or disclose these information to third parties.

- 4.1.3 Directors, Officers, or Employees shall refrain from using the Company's name, logo, trademark and other intellectual properties or data, facilities, and resources in sponsoring, recommending, or promoting any third party commercial service or product, unless such is at the request of the Company or is part of the Directors, Officers, or Employees' corporate duties or responsibilities.

4.2 Social Media Usage

- 4.2.1 When using social media, Directors, Officers, or Employees shall act responsibly and with utmost due diligence with the information, privileges, and resources they are entrusted with or have access to by virtue of their position and functions.
- 4.2.2 Personal social media accounts or profiles should not bear the name of Meralco, its logo, or any Meralco-related branding in a manner that would create an impression that said accounts or profiles are official accounts belonging to, or being managed by, the Company.
- 4.2.3 Directors, Officers, Employees shall adhere at all times to applicable Company policies such as, but not limited to, the Code of Business Conduct and Ethics, Information Security, Supplier's Business Conduct Policy and Code on Right Employee Conduct (COREC) when using social media either officially or personally. In line with the foregoing, Directors, Officers, or Employees shall conduct and present themselves on social media in a manner that is consistent with proper decorum and behavior acceptable in the corporate world or their dealings with stakeholders, and in so doing, they should presume that every post, message or exchange they do on social media is public. Accordingly, Directors, Officers, or Employees shall:
- 4.2.3.1 Avoid sharing posts or other content that are unverified and shall not share communications that are false, defamatory, or vexatious, or remarks that may induce or contribute to a hostile environment or discredit another person or institution, impute the commission of a crime or violation of law even before trial and judgment, and violate the privacy of another person or entity.

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- 4.2.3.2 Avoid any online behavior not conforming to the Company's ethical principles and core values including posts or comments that could be perceived as prejudiced or discriminatory against any gender, sexual orientation, race, religion or belief.
- 4.2.3.3 Comply with the established rules on attribution and avoid infringement of copyright, trademark, and other intellectual property rights.
- 4.2.3.4 Refrain from publishing or posting messages or comments related to the Company's financial information, management changes or initiatives, lawsuits, shareholder affairs, human resource practices, and contracts with business partners, customers, suppliers, and other stakeholders unless authorized to do so or the Company information being posted had been previously disclosed to the public by proper authorized Company representative.
- 4.2.3.5 Comply with the provisions of Philippine data privacy laws and the internal policies of Meralco, and to refrain from using personal data within the control of Meralco for unauthorized purposes, including but not limited to their own personal use.
- 4.2.4 Directors, Officers, or Employees shall be responsible in their personal capacity for any content published, shared, or posted in social media that is in violation of existing laws or internal policies, standards, and procedures of MERALCO.
- 4.2.5 Directors, Officers, or Employees shall not use the Company's resources for personal or non-Company related activities or for purposes outside of the Company's corporate mission and vision. As such, personal use of social media should not be conducted during Company time or through official company-related online platforms.
- 4.2.6 Directors, Officers, or Employees are encouraged to participate in various Company-sponsored social media applications, sites, and tools which are aimed to foster efficiency, measure the rate of stakeholder engagement, improve brand reputation and perception, and implement advisories or crisis response protocol.
- 4.2.7 Directors, Officers, or Employees are expected to report to the Company's Social Media Team any negative remarks as well as inaccurate or false information about the Company or its products and services that they may see or encounter in social media platforms.
- 4.2.8 Directors, Officers, or Employees communicating officially or on behalf of the Company in social media platforms shall be required to disclose their name and affiliation with the Company and strive to, as far as practicable,

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keep records of their communication or interaction in the social media space and monitor, as far as practicable, the activities of third parties with whom they engage to ensure compliance with their respective engagement.

4.3 Applicability to Third-Party Business Partners

The foregoing Standards shall also apply to Third-Party Business Partners as defined herein to the extent applicable.

5. Roles and Responsibilities

5.1 Public Relations Office shall perform the following, among others:

- 5.1.1** Set the procedures and standards for releasing public announcements about the Company in various social media platforms.
- 5.1.2** Approve and endorse Company statements such as press releases, official statements, articles, and public announcements to be released to the media and public.
- 5.1.3** Endorse relevant content for circulation in social media.
- 5.1.4** Provide direction and guidance for communication plan to protect the Company's brand and reputation, and to anticipate threats or potential crises.

5.2 Social Media Team shall, among others:

- 5.2.1** Provide governance of the Company's social media platforms aimed at engaging customers in the Company's social media channels, including communicating to relevant stakeholders the social media platforms, applications, sites and the tools owned or managed by the Company.
- 5.2.2** Develop standards and guidelines to address concerns and issues raised via social media channels to be utilized by internal organizations or by third party agencies managing these channels.
- 5.2.3** Monitor social media posts about the Company and facilitate internal resolution of social media posts that violate Company policies and standards.

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5.3 Directors, Officers, and Employees shall:

- 5.3.1** Ensure the accuracy, truthfulness and fairness of their postings and messages in social media platforms.
- 5.3.2** Refrain from posting communications, information, or announcements about the Company that are not yet officially released to the public by the Public Relations Office.
- 5.3.3** Exercise utmost propriety, decency, and decorum in using the Company's social media pages and when referencing anything in relation to the Company in their personal social media accounts. Accordingly, they should not post commentary, content, or images, that are defamatory, illegal, libelous, or otherwise create hostile work environment, or harm the image or reputation of the Company.

5.4 Should a Director, Officer, or Employee encounter criticisms, negative posts, or incident reports in social media that are deemed material and relevant to the Company, he/she should refrain from engaging and must refer the matter to the Social Media Team and/or subject matter experts in the Company to respond accordingly as provided in the escalation table below:

INCIDENT REPORT	Organization
1) Customer account/service complaints or operating troubles	Contact Center Operations/CRS
2) Violation of corporate governance rules and policies or financial fraud involving:	
Director	Nomination and Governance Committee
Officer	Office of the President and CEO
Organizational Head	Group Head/ Next Level Superior
Employee	Organizational Head
Third-Party Business Partners	Immediate head of the organization charged with the implementation of the contract or cost center where the contract is charged
3) New products/ service offerings	Marketing and Customer Solutions and Product Development
4) Shareholder Affairs	Compliance Officer
5) Investor Affairs	Investor Relations
6) Billing Rates and Tariff, Issues Management, Media Relations	Corporate Communications – Public Relations

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6. Penalties

- 6.1 Any Director, Officer, or Employee who fails to comply with this Policy, shall be subjected to applicable penalties and sanctions as stated in the Company's Code of Conduct.
- 6.2 Any Third-Party Business Partner who fails to comply with this Policy, shall, upon due process, be subjected to applicable penalties or sanctions in accordance with the terms of the contract or engagement.

7. Amendment or Alteration of this Policy

This Policy shall not be supplemented, amended, altered or varied unless such supplemental, amendment, alteration or variation shall have been approved by a resolution of the Board of Directors of the Company.

8. Effectivity

The Social Media Policy, as amended, shall take effect immediately upon its approval by the Board of Directors.