

Norfolk Southern Social Computing Guidelines

(November 2020)

As Norfolk Southern employees, each of us is responsible for protecting the good name of the Thoroughbred team. Guided by our SPIRIT values and Thoroughbred Code of Ethics, we act with integrity and hold ourselves to the highest standards of ethical conduct – in our dealings with each other and with the world around us. Your leadership in upholding these values is essential to achieving our vision to be the most successful transportation company in the world.

Jim Squires

Norfolk Southern Corporation relies on the safety, performance, integrity, respect, innovation, and teamwork of its employees to realize our corporate vision. The company believes in its employees' right to freedom of expression, online and elsewhere, and recognizes that digital and mobile media are preferred methods of communication for a large and growing segment of our diverse workforce. At the same time, we expect our employees to exercise that freedom consistent with corporate policies, the SPIRIT values, ethics guidelines, and good judgment. Social media activities in or outside of work that affect your job performance or NS' business interests are a proper focus for this policy.

The rise of new media and communications tools expands the options available to NS employees for communicating internally and externally. While this creates new opportunities for communication, collaboration, and business growth, it also creates new responsibilities for you as an employee.

These guidelines apply to employees who use or access the following:

Multimedia and social networking sites, chat rooms, bulletin boards, websites, instant messaging, blogs, wikis, and virtual worlds

Norfolk Southern-provided computing and communications equipment, including but not limited to desktop computers, laptops, cell phones, Blackberries, and other personal digital assistant devices

Please be aware that violation of these guidelines and policies may result in disciplinary action up to and including termination.

Common sense is the best guide if you decide to post information in any way relating to Norfolk Southern. When in doubt, leave it out.

1. **Association and Content.** The company recognizes and appreciates the pride employees have in their affiliation with Norfolk Southern and gives employees license to share publicly their association with NS via social media. However, only those employees or third parties officially designated by NS may use social media to speak on behalf of NS, or to take official positions on NS or NS-related topics. Employees who are

not authorized to speak on behalf of NS in an official capacity may choose to communicate their opinions or thoughts about NS or NS-related topics via social media channels. If employees choose to do so, they should make clear that such communications are not official NS communications (see #12 Disclaimers below).

Examples of acceptable public references in addition to work affiliation include participation in NS-sponsored or industry meetings, and activities sponsored by company programs such as Thoroughbred Volunteers or WellNS. If you elect to draw an association with Norfolk Southern, recognize that you are accountable for the impact of that association. For your protection, and the protection of NS, you never should:

- disclose nonpublic information about the company, including legal matters, litigation, or NS' financial performance;
- engage in any activities that could result in a copyright infringement claim;
- use social media to evaluate the performance of co-workers, business partners, or vendors;
- identify by name, criticize, or complain about the behavior or actions of customers, partners, or suppliers; or
- discuss or reference NS policies, procedures or programs that are not publicly available on the Internet. Any such discussion or reference should include a link to the policy, procedure, or program.

2. **Public Domain & "Private Life."** We expect all employees to act professionally on the job and to refrain from behavior on and off the job that adversely could impact Norfolk Southern Corporation's reputation or mission. When you visit or comment on public sites, you leave a record of your visit. Whether you do so as an NS employee or as a private citizen, that electronic record is the same and is potentially visible to millions, including your colleagues at NS. Electronic chains of association can be made also via the IP address of your computer and the Web servers sending and receiving your information. If you decide to "leave your mark" on a site, understand the potential to do harm to your reputation or employment relationship. Additionally, information that you post or provide could be required to be produced in litigation. Choose your words carefully, and if in doubt, don't do it or say it.

3. **Confidentiality.** You must respect and not disclose any sensitive, proprietary, confidential, and private information of the company, its customers, vendors or employees. No confidential information should be published or posted by you prior to the company's releasing it to the general public. You never should publish or post the personal information of your fellow employees. What level of protection is needed to ensure that this information does not fall into the wrong hands? There are four levels of classification.
 - a. Restricted is the highest level of confidentiality. Extreme harm can occur to NS if compromised.
 - b. Confidential data release can cause substantial harm to NS if compromised.
 - c. Internal information causes limited harm if compromised; however, it should not be released outside NS unless there is a business need to do so. All information is internal unless otherwise designated.

- d. Public information is formally approved for public release and is the only information you may disclose. Examples are information the company has posted on its public websites or published in nonconfidential documents already distributed to audiences outside the company.
4. **Intent vs. Impact.** Be aware that although your searches or postings may not intend to do harm to others or the company, the impact may be harmful, offensive, disrespectful, demeaning, inaccurate, or even defaming. **There may be legal consequences for private-sector employees who enter into communications, electronic or otherwise, that defame their employers, improperly harm other employees, or compromise the trade secrets and intellectual property of their employers.**
5. **Offensive Material.** It is prohibited to engage in blogs, message boards, websites, and virtual worlds involving inappropriate, offensive, or obscene statements or conduct while utilizing NS assets. No pornographic, obscene, or offensive sites may be accessed on NS devices at any time, nor is it allowable to intentionally attempt to access such sites by deliberately circumventing Web protections put in place by Norfolk Southern. Be aware that whether you use company provided computing and communication equipment or equipment of your own ownership, engaging in objectionable, offensive, defaming, or inflammatory conduct can be the basis for disciplinary action and/or termination.
6. **Incidental use.** Responsible incidental personal use is permissible at work so long as it is not excessive or offensive and does not significantly interfere with productivity or preempt any legitimate business activity. If you have a personal site, do not maintain it on company time or computing devices. Also, be reminded that content accessed on NS devices (sites visited, search terms used, e-mails, and voice mails) can be and is monitored by Information Security and Audit and Compliance.
7. **My.Name@nscorp.com.** Use of your nscorp.com e-mail for messages of a personal nature is still governed by the requirements *Information Security Policy and Process Documents (ISPPD)*. When you use the @nscorp.com e-mail address, you are forming an association with Norfolk Southern (See #1 Association above). Your use of the @nscorp.com e-mail address to send personal messages is highly discouraged. Use good judgment and good taste and show respect to others in your email. Never use your nscorp.com e-mail to send flaming messages, particularly those of a personal nature, outside of or inside Norfolk Southern. "Flaming" messages can be defined as hostile, aggressive, uninhibited, intimidating, insulting, or offensive. All messages are the intellectual property of Norfolk Southern, and individuals should have no expectation of privacy.

8. **Company-Provided Computing and Communication Equipment.** Company-provided phones, computers, and other devices are for company business, subject to the ISPPD and any other applicable departmental rules. All company provided devices are the property of Norfolk Southern, are subject to access and data collection at any time, and must be returned in proper working condition upon the employee's separation from employment or upon the company's earlier demand unless the company directs otherwise. Employees may be held financially responsible for any lost, damaged, or unreturned company devices.

9. **Media Files.** The posting of video, audio and photography files related to Norfolk Southern that are recorded or obtained during company time or in the course of one's job related duties is prohibited. Unless you are commenting publicly with the permission of the company in order to perform the duties of your position or are participating in company-approved activity, media related to Norfolk Southern Corporation should not be posted.

10. **Disclaimers.** If you choose to maintain a personal site outside of Norfolk Southern, the contents of your blog, website, and other postings should be labeled as yours alone. If you are identifiable as a Norfolk Southern employee, you should use a disclaimer such as: "The opinions expressed in this (blog, website, etc.) are solely my own and do not necessarily reflect the views of Norfolk Southern Corporation." Further, all communications that in any way relate to NS should include a disclaimer within the communication such as: "I am not an official spokesperson for NS but my personal opinion is . . ." If you are not identifiable as a Norfolk Southern employee, you should use a disclaimer such as: "The opinions expressed in this (blog, website, etc.) are solely my own and do not reflect the views of any other person or corporation."

11. **Common sense.** Common sense is the best guide if you decide to post information in any way relating to Norfolk Southern. If you are unsure about any particular posting, please contact your supervisor, the Information Security Group, or the Ethics & Compliance Hotline at 800-732-9279.

12. **Corporate Policies and Procedures.** In addition to following the Social Computing Guidelines, all employees are expected to read, know, and comply with the documents listed below. To review them, log in to the Norfolk Southern ethics site at <http://ethics.nscorp.com> and click on the Policies tab, unless otherwise noted.

Information Security Policy and Process Documents (ISPPD) – ST.014 Connecting to External Networks Standard

Using Your Company Computer & Information Security Code of Conduct

Corporate Policy 212 Commitment to Core Values and Ethical Business Conduct

The Thoroughbred Code of Ethics

Operating Rule 2 and 5 ([available here](#))

Policy/Procedure 206/206.1 Records Management

Policy/Procedure 208/208.1 News Media Inquiries

Policy 213 Confidentiality of Transportation Contracts and Other Confidential Rate Quotations

Policy/Procedure 216/216.1 Requests for Information from Financial Analysts and

Investors *Fair Disclosure Guide*

Policy/Procedure 401/401.1 Crisis Communications

Patent Agreement (Form 11473)

Remember that if you are using the company's computing domain or company equipment, all activities, including those of a personal nature, are subject to the requirements of the *Information Security Policy and Process Documents (ISPPD)*