

## SOCIAL MEDIA POLICY as of October 20, 2011

★ Please access [Starwood ONE](#) for the latest version of this policy ★

### Overview

Many associates, consultants, and contractors access and use social networking websites (e.g., Facebook, LinkedIn), Micro-blogging websites (e.g., Twitter), location based services (e.g., Foursquare), video and photo sharing websites (e.g., Flickr, YouTube), blogs and other social media tools (collectively, the “**Social Media Platforms**”) as part of their job and also for personal, non-business purposes. With the rapid emergence of new Social Media Platforms, this policy cannot address every possible situation. Instead these are general principles to be followed when you use Social Media Platforms for a business purpose or in a manner that identifies you with Starwood. Note that if local law or your job poses additional restrictions on your access or use of Social Media Platforms, you must comply with these restrictions.

You are responsible for taking the time to read and understand, respect and comply with this Social Media Policy, other Starwood policies that may be applicable to your use of Social Media Platforms including the [Code of Business Conduct](#), the [Use of Technology Policy](#), [Records & Information Management Policy](#), the [Media Inquiries Policy](#), the [Anti-Discrimination, Unlawful Harassment, and Retaliation Policy](#) and the [Confidential Information & Privacy Policy](#), and the terms and conditions of use governing each applicable Social Media Platform. Starwood will investigate any reported violations of this policy as appropriate. Violations of this policy may result in disciplinary action, up to and including termination of an employment or contractual relationship.

### Policy

When using any Social Media Platform on behalf of Starwood, a Starwood affiliate or a Starwood property or in a way that discloses your connection with Starwood, you must use common sense and good judgment and:

- not reveal confidential or proprietary information of Starwood, its owners, customers or business partners;
- comply with applicable law, rules, regulations or ethical constraints (e.g., not make statements that are libelous, defamatory, offensive, harassing, discriminatory, racist or obscene);
- follow all Starwood Policies, including the *Code of Business Conduct* and the other policies named above;
- respect others and not attack or disparage Starwood, customers, vendors, competitors, or other associates, consultants or contractors;
- be consistent with the applicable Social Media Platform provider’s terms of use – remember these are subject to change and do change on a frequent basis;
- not comment on stock prices, legal matters, business performance, strategy or rumors about Starwood;
- not reveal who Starwood is doing business with or contemplating doing business with (i.e., do not check-in on location based websites when visiting other companies); and
- not violate any trademark, copyright, trade secret, other intellectual property or proprietary rights or license terms of Starwood or any third party.

If a member of the media contacts you about a Starwood related posting on a Social Media Platform you should refer the media to official channels in accordance with the [Media Inquiries Policy](#).

## ***Business Use of Social Media Platforms***

In addition to the general guidelines above, when you use any Social Media Platform in a job related capacity you must have approval of an authorized Starwood representative and comply with any Starwood policies and guidelines that apply to your job, team, property or division including the [Social Media Marketing Guidelines & Best Practices](#). You must also act consistent with the following guidelines:

- when writing about your work at Starwood, you must be transparent – use your real name, identify that you work at Starwood, and identify your role at Starwood;
- when posting pictures or videos of current or former associates or referencing partners by name, work with legal ([weblaw@starwoodhotels.com](mailto:weblaw@starwoodhotels.com)) to ensure that you have appropriate permissions;
- when making claims about Starwood properties, products or services, these claims must be truthful, accurate and substantiated – make it clear when you are stating opinions as opposed to facts;
- before conducting a prize promotion (e.g., contests, sweepstakes or any game of chance or skill), the promotion must be reviewed and approved by legal in writing ([prize.promotions@starwoodhotels.com](mailto:prize.promotions@starwoodhotels.com));
- before endorsing any person, product, service, or cause, you must obtain written authorization from legal ([weblaw@starwoodhotels.com](mailto:weblaw@starwoodhotels.com));
- you must obtain written authorization from the privacy team ([privacy@starwoodhotels.com](mailto:privacy@starwoodhotels.com)) before collecting or using any information about users, commentators, or “friends” through Social Media Platforms; and
- you may not collaborate with colleagues, establish a forum to discuss internal issues, or conduct brainstorming sessions on a Social Media Site (e.g., Yammer), even if you set up a private community, unless you enter into a contract that contains terms approved by legal ([weblaw@starwoodhotels.com](mailto:weblaw@starwoodhotels.com)).

Note that if you engage or incentivize a third party to create content on behalf of Starwood (e.g., engage a guest blogger, encourage a contest winner to comment about Starwood), such third party must clearly disclose its relationship with Starwood on the relevant Social Media Platform and comply with this policy.

## ***Personal Use of Social Media Platforms***

When you use any Social Media Platform for a personal, non-business purpose, the following guidelines apply:

- once you identify yourself as a Starwood employee or acknowledge your affiliation with Starwood (including by listing Starwood as the place where you work), you should include a notice that makes it clear that your views do not necessarily reflect the views of Starwood. For example: *“The postings on this site are my own and don’t necessarily represent the position, strategies or opinion of Starwood Hotels & Resorts Worldwide, Inc.”*;
- when commenting on about Starwood properties, products or services, you must identify your affiliation with Starwood; and
- Starwood logos, trademarks, brand names or any content or other materials that belong to Starwood must not be posted on your personal pages, used as part of your identifier, or otherwise used in connection with your use of Social Media Platforms without obtaining written approval from your manager and legal ([weblaw@starwoodhotels.com](mailto:weblaw@starwoodhotels.com)).

If you have any questions about what is appropriate to include in your postings on Social Media Platforms please contact [weblaw@starwoodhotels.com](mailto:weblaw@starwoodhotels.com).