Network, Internet & Social Media Policy

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**Purpose**
The purpose of this policy is to ensure the appropriate, responsible, and safe use of electronic communications including the A. O. Smith Corporation Network, the Internet, and social media.

*Nothing contained in this policy will be interpreted or applied to restrict the rights guaranteed to Company employees by Section 7 of the National Labor Relations Act. Specifically, employees are free to discuss their wages, hours, benefits, and other terms and conditions of employment with others online, or in any other medium or forum, or to refrain from such discussions.*

**Scope**
This policy applies globally to all employees of A. O. Smith Corporation ("A. O. Smith" or "Company") and its subsidiaries, joint ventures, and other affiliates. It also applies to other individuals and entities that A. O. Smith may require to adhere to this policy. To the extent this policy is inconsistent with any local laws applicable at a particular A. O. Smith global location, the local law applies and will be followed.

**Policy Requirements**
I. **A. O. Smith Network and Internet Policy**

1. **Overview:**

A. O. Smith employees who will be using Company technology resources in the performance of their jobs will be assigned a user ID in order to grant authorized access to these resources. These resources could consist of productivity software such as Microsoft Office, email, business systems (e.g., order processing, accounting, etc.), the Company’s private Intranet (AOSNET) and Internet web sites. Access to these resources will normally take place through the A. O. Smith
Network when onsite at one of our facilities, or by use of a Virtual Private Network (VPN) connection. This policy will define the rules and conditions for access and use of the A. O. Smith Network.

The term ‘A. O. Smith Network’ will be used throughout this policy to represent access to those technology resources inclusive of both Company software and systems, any data generated or stored on Company servers or storage devices, as well as Internet-based web sites that are allowed.

An electronic signature at the conclusion of this policy is required before first time entry of any user onto the A. O. Smith Network; it will also be required before entry to the A. O. Smith Network upon any change or revision of the policy. All A. O. Smith employees, contractors and business associates who use the A. O. Smith Network agree by such use to comply with the expectations outlined in this policy. A. O. Smith reserves the right to change this policy at any time.

2. Purpose:

Use of the A. O. Smith Network by A. O. Smith employees is permitted and encouraged where such use is suitable for business purposes and supports the goals and objectives of A. O. Smith and its business units. The A. O. Smith Network is to be used in a manner that is consistent with A. O. Smith’s standards of business conduct and as part of the normal execution of an employee’s job responsibilities.

3. Ownership:

The A. O. Smith Network and much of the information stored on the A. O. Smith Network is A. O. Smith property. A. O. Smith property will oftentimes be identified by the A. O. Smith copyright logo. Any external links, publications, or Real Simple Syndication (RSS) content feeds will not have the A. O. Smith copyright logo and may have an external copyright logo. Unauthorized use, copying, or dissemination of A. O. Smith owned and/or A. O. Smith licensed materials is prohibited. If you have any questions, please contact the Director of Corporate Communications and the Legal Department.

4. Use – Business or Personal:

A. O. Smith Network is provided at A. O. Smith expense and is to be used primarily to conduct A. O. Smith business. A. O. Smith reserves the right to limit or prohibit personal use. Personal use of the A. O. Smith Network (examples of this are Yahoo ® and Google ® links, Facebook, LinkedIn, or other social media) may be allowed, but should be limited to reasonable use and time. A. O. Smith employees are not to use the A. O. Smith Network to engage in activities that are illegal or prohibited by A. O. Smith policies.
5. No Presumption of Personal Privacy:

General communications on the A. O. Smith Network are not private and security cannot be guaranteed. Passwords and user IDs are designed to protect A. O. Smith’s confidential information, not to provide employees with personal privacy in their communications through the A. O. Smith Network. In using the A. O. Smith Network, employees should be aware that all connections, sites visited, and communications may be monitored and recorded. Employees should assume that any communications that they create, send, receive, or store on the A. O. Smith Network may be viewed by someone other than the intended recipient. Some special project groups may be created in which confidential information may be encrypted or password restricted, and information will be kept confidential from the general A. O. Smith public. However, this information may still be monitored by appropriate parties. Encryption and/or other safeguarding measures for these special project groups may only be done with management consent.

6. A. O. Smith’s Right to Monitor Communications:

A. O. Smith reserves the right to monitor, access, retrieve, read, and disclose to law enforcement officials or relevant third parties all content and communications created, sent, or received on the A. O. Smith Network without prior notice to the originators and recipients of such messages. Authorized personnel may monitor the electronic communications through the A. O. Smith Network to determine whether there have been violations of law, breaches of confidentiality or security, communications harmful to the business interests of A. O. Smith, or any violations of this Policy, any other A. O. Smith policy, or the A. O. Smith Guiding Principles.

7. Content Creation and Restrictions:

Employees must use the utmost care in creating content via the A. O. Smith Network. Even when content has been deleted, it may still exist on a back-up system, be recreated, be printed, or may have been forwarded to someone else without its creator’s knowledge. As with paper records, proper care should be taken in creating electronic records, which can be considered documentation subject to subpoena. Content posted on the A. O. Smith Network may not contain content that a reasonable person would consider to be defamatory, offensive, or harassing, including but not limited to sexual comments or images, racial or ethnic slurs, or other comments or images that would offend someone on the basis of race, gender, national origin, sexual orientation, religion, political beliefs, disability, age, or other protected category.

8. Prohibited Activities:

Employees may not use the A. O. Smith Network to:

- Upload, download, or otherwise transmit patentable material or trade secrets or other confidential A. O. Smith information or materials without prior A. O. Smith authorization.
- Upload, download, or otherwise transmit any illegal information or materials or otherwise engage in illegal activities.
• Upload, download, access, create, distribute, or otherwise transmit sexually explicit materials.
• Gain unauthorized access to protected information on the A. O. Smith Network or computers inside or outside the A. O. Smith firewall.
• Damage, alter, or disrupt the A. O. Smith Network itself or use it to damage, alter, or disrupt computers inside or outside the A. O. Smith firewall.
• Enable unauthorized third parties to have access to or use the A. O. Smith Network or otherwise jeopardize the security of the A. O. Smith Network.

In addition to the above, use of another individual’s user ID and/or password or disclosing your or another individual’s user ID and/or password is prohibited.

9. Record Management and Retention on AOSNET:

Any content created by A. O. Smith is subject to the Company’s Records Management Policy. The individuals who author content on the AOSNET are responsible, on an annual basis, to review their content and delete content as designated by the Legal Department’s Record Retention Schedule, which is attached as an appendix to the Records Management Policy. As with other files or records, destruction must be authorized and documented using the appropriate forms furnished by the Legal Department. For more information, refer to the Company’s Records Management Policy. This policy does not pertain to third-party content on the A. O. Smith Network such as RSS feeds.

Administrators shall provide a list of all content being maintained on the site to the appropriate content authors. Authors will respond to the content listing with a “keep”, “keep until date”, or “discard” response for all content in all files, folders, and archives.

10. Viruses and Tampering; and other Requirements for Users:

Any questionable data that is not from a trusted source must be scanned with virus detection software before installation and/or execution. This questionable data may include files downloaded from the Internet, USB jump drives, and e-mail attachments. The introduction of viruses, attempts to breach system security or other malicious tampering with any system on the A. O. Smith Network is expressly prohibited. Employees must immediately report any viruses, tampering or other system breaches to the A. O. Smith Information Technology (IT) Department.

Other requirements applicable to both use of the A. O. Smith Network and social media follow in Sections II and III of this policy.

11. Consent to use AOSNET:

By using AOSNET, each employee agrees that the employee has read, understands, and agrees to the terms set forth in this policy. The employee acknowledges that using the A. O. Smith Network is a privilege that may be revoked upon the sole discretion of A. O. Smith for any reason and that access to the A. O. Smith Network automatically terminates upon separation from A. O. Smith.
II. Social Media Policy and Guidelines

1. Overview:

Use of social media presents certain risks and carries with it certain responsibilities. This policy provides guidance and information to employees on A. O. Smith Corporation’s expectations related to appropriate communications through social media networks. Employees should keep in mind that any conduct that adversely affects their job performance, the performance of fellow employees, or otherwise adversely affects customers, suppliers, people who work on behalf of Company, or A. O. Smith’s legitimate business interests may result in disciplinary action up to and including termination.

2. Scope:

The Company respects the right of its employees to utilize social media, but also asks employees to remember that customers, colleagues and supervisors often have access to the online content they post. Keep this in mind when publishing information online that can be seen by more than friends and family and know that information originally intended just for friends and family can be forwarded.

Remember to NEVER disclose non-public information of the Company (in particular, confidential and/or proprietary commercial information). Disclosing such confidential or proprietary information online could severely damage A. O. Smith in the marketplace and put the Company at a competitive disadvantage.

Also, the same principles, guidelines, and policies governing your employment apply to your online activities. Employees must follow all applicable Corporate Policies and Guidelines, including the Insider Trading Compliance Policy, Records Management Policy, and Antitrust Compliance Policy.

This policy applies to all employees worldwide; however, if local laws governing privacy or social media contradict the terms of this policy, those laws and guidelines apply. These guidelines also apply to all employee activities, whether at work or at home.

Nothing contained in this policy and guidelines will be interpreted or applied to restrict the rights guaranteed to Company employees by Section 7 of the National Labor Relations Act. Specifically, employees are free to discuss their wages, hours, benefits, and other terms and conditions of employment with others online, or in any other medium or forum, or to refrain from such discussions.

3. Social Media Examples:

Social media include all forms of public, Web-based communication and expression that bring people together by making it easy to publish and share content with many audiences.
Below are some common examples of social media. This policy is not, however, limited to these platforms. Rather, it covers all forms of social media, whether existing at the time of this policy’s adoption or those yet to be created. Questions regarding whether a platform or tool constitutes social media and is covered by this policy should be directed to the Director of Corporate Communications.

Social Media Include:
- Social networking sites (e.g., Facebook, MySpace, Bebo, Friendster, LinkedIn)
- Video and photo sharing websites (e.g., Flickr, YouTube, Instagram)
- Micro-blogging sites (e.g., Twitter)
- Blogs (e.g., corporate blogs, personal blogs, media-hosted blogs)
- Forums and discussion boards (e.g., Whirlpool, Yahoo! Groups, Google Groups)
- Collaborative publishing (e.g., Wikipedia)
- Bookmark sites (e.g., Delicious, Furl)
- Linklog sites (e.g., blogs that only post URLs for interesting sites)

4. Guidelines for Appropriate Conduct Online

Employees are personally responsible for the content they publish on blogs, wikis, or any other form of social media. Be mindful that what is published will likely be public for a long time.

*Consistent with A. O. Smith’s Guiding Principles, do not post material that is obscene, defamatory, threatening, harassing, discriminatory, or malicious to another person, group, or entity, including A. O. Smith, its employees and its partners. Adhere to the Terms of Use of the site and respect the cultural and behavioral norms of the social media platform being used.*

Employees who choose to participate in online social networking should be aware that their posts may be widely seen and distributed, and they should not have an expectation of privacy. The Company reserves the right to monitor publicly available posts and comments made on social media sites. Company policies including those regarding anti-harassment, conflicts of interest, the Guiding Principles and ethics extend to all forms of communication, including social media, regardless of whether it takes place on or off Company premises, or before or after scheduled work shifts. Employees must remember that conduct that adversely affects their job performance, the performance of fellow employees, or otherwise adversely affects employees, customers, suppliers, people who work on behalf of Company, or Company’s legitimate business interests may result in disciplinary action up to and including termination.

Employees, managers and executives, by virtue of their positions, must also consider whether personal thoughts they publish may be misunderstood as expressing the Company’s positions. A manager should assume that his/her direct reports (or other employees) may read what is written. A public blog is not the place to communicate Company policies to employees.
5. Personal Information of Colleagues

Do not discuss or use the identity of another A. O. Smith employee, or an employee of an A. O. Smith business partner or competitor, in any communication that could be construed to be a statement made on behalf of the Company without the express permission of A. O. Smith. Do not speak on behalf of another A. O. Smith employee, or an employee of an A. O. Smith business partner or competitor without their permission.

6. Media Inquiries and Other Requirements for Social Media Users

Blog postings and other social media discussion forums may generate inquiries about Company news and information. If a member of the media or an independent blogger requests information about the Company’s official position on a matter, or requests an interview with a Company representative, contact the Director of Corporate Communications. Do not respond to the request for information.

Other requirements applicable to both use of social media and A. O. Smith Network follow in Section III of this policy.

III. Requirements Applicable to A. O. Smith Network and Social Media

1. Guidelines for Referring to the Company

Only employees who have been given specific permission and authority to speak on behalf of the Company may do so.

There is a significant distinction between speaking “on behalf of” A. O. Smith (as an official spokesperson) and speaking “about” A. O. Smith, its products or business partners. It is important for employees to know their role when making statements concerning A. O. Smith (e.g.: as an employee; official spokesperson working in the Corporate Communications Department; or purely personal use). Employees must be mindful as to who they are representing when using social media. As it relates to an employee’s personal use of social media:

• Employees who make reference to A. O. Smith on external social media sites in a product promotional context must identify themselves by name and title within A. O. Smith. For example, if endorsing a product or discussing a competitor’s product, employees must disclose their position with the Company. Employees should only be speaking on these subjects after obtaining permission to do so. Failure to follow these guidelines could subject the employee and/or the Company to claims of false advertising.

• Also, supervisory personnel should not use these sites to recommend, endorse, or otherwise assess the qualifications or performance of their direct reports or colleagues.
• Unless authorized by the Company to do so, employees should not hold themselves out as representing A. O. Smith's views. Employees should be clear they are not speaking on behalf of A. O. Smith.

Once you are no longer an employee of A. O. Smith, you are obligated to update your status on all social media sites on which you appear.

2. Logos, Copyrights and Trademarks

**External Intellectual Property**—Do not use any words, logos, or other marks that would infringe upon the trademark, service mark, certification mark, or other intellectual property rights of the owners of such marks without written permission from the owners. Employees should contact the Corporate Legal Department and the Director of Corporate Communications if they are unsure about the use of certain information.

**Company Intellectual Property**—Use of social media tools to copy, publish, or transmit for commercial or competitive purposes any material protected by the copyright laws, including copyrights, logos, marks, or brands of A. O. Smith is prohibited without first obtaining written permission from the Corporate Legal Department and the Director of Corporate Communications.

3. Proprietary and Confidential Information

All rules that apply to employee activities, including all A. O. Smith policies and procedures affecting the use, dissemination and protection of proprietary and confidential information, apply to online activity. *The transmission of customer-sensitive material or any other proprietary commercial information without the permission of the Company or customer is strictly prohibited. Information about A. O. Smith (such as, strategic planning materials, business models, trade secret information or financial information) that has not been made public by A. O. Smith cannot appear in any social media communication under any circumstances. A. O. Smith content to be posted to any company public Internet site must be reviewed and approved in advance by the Legal Department and the Corporate Communications Department in accordance with the Company’s policies.*

**Violations**

Violations of this Policy with respect to use of the A. O. Smith Network, including breaches of confidentiality or security, may result in suspension of the A. O. Smith Network privileges and/or disciplinary action up to and including termination. Any suspected violations are to be communicated to your supervisor and/or your Human Resources representative as soon as possible. A. O. Smith reserves the right to hold the employee personally liable for any violations of this Policy with respect to use of AOSNET or the Internet.

Likewise, social media use, if in violation of these guidelines, the Company’s Guiding Principles or other Company policies, can result in discipline, up to and including termination of employment from A. O. Smith. Employees will be disciplined by the Company for commentary,
content, or images that are defamatory, pornographic, proprietary, harassing, libelous, or create a hostile work environment.

Additionally, since individuals are legally liable for anything they write or present online, they could be sued by other Company employees, competitors, and any individual or company that views their commentary, content, or images as defamatory, pornographic, proprietary, harassing, libelous or creating a hostile work environment.

Employees could also be liable if they make postings which include confidential or copyrighted information (music, videos, text, etc.) belonging to third parties. Depending on the nature of the social media content, individuals could be subject to civil and/or criminal penalties.

**Policy Owner/Contact**
The Corporate General Counsel of A. O. Smith Corporation, and Corporate Executive responsible for Human Resources at A. O. Smith Corporation, are responsible for the implementation of this policy. The Corporate Executive responsible for Information Technology is responsible for the availability and management of the software and hardware that supports the A. O. Smith Web Network. Please contact any of these individuals if you have a question regarding the policy, or to report a concern or violation of this policy.

NOTE: THIS POLICY MAY ONLY BE REVISED IF APPROVED BY THE CORPORATE GENERAL COUNSEL OF A. O. SMITH CORPORATION, THE CORPORATE EXECUTIVE RESPONSIBLE FOR HUMAN RESOURCES AT A. O. SMITH CORPORATION, AND THE CORPORATE EXECUTIVE RESPONSIBLE FOR INFORMATION TECHNOLOGY AT A. O. SMITH CORPORATION.