Network, Internet & Social Media Policy

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<tr>
<th>Policy Type: Global</th>
<th>Date of Last Review: November 2018</th>
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<td>Scope: All Locations Globally</td>
<td>Effective Date of this Version of Policy: November 2018</td>
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<tr>
<td>Name of Policy: Network, Internet &amp; Social Media</td>
<td>Document Control #: Global Policy 08</td>
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**PURPOSE**

The purpose of this Policy is to promote A. O. Smith Corporation’s ongoing commitment to compliance with all applicable laws, including specifically those related to data, privacy and cyber security, and to ensure the appropriate, responsible, and safe use of electronic content and communications.

**SCOPE**

This Network, Internet & Social Media 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 shall be followed.

*Nothing contained in this policy will be interpreted or applied to restrict the rights guaranteed to Company employees by Section 7 of the United States National Labor Relations Act, or by any other Labor laws. Where allowed by law, 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.*

**DEFINITIONS**

The term *A. O. Smith Network* will be used throughout this Policy to represent access to and use of technology resources inclusive of both Company software and systems, access to the internet, and any data generated or stored on Company servers or storage devices (including cloud applications).
**Social Media** is 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. Examples of Social Media include, but are not limited to:

- Social networking sites (e.g., Facebook, MySpace, Instagram,SnapChat, Bebo, WeChat, Friendster, WhatsApp, LinkedIn)
- Video, Music, and photo sharing websites (e.g., Flickr, YouTube, Instagram, Spotify)
- Micro-blogging sites (e.g., Twitter)
- Blogs (e.g., corporate blogs, personal blogs, media-hosted blogs)
- Forums and discussion boards (e.g., Reddit, Craigslist Forum, Quora, 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)
- Any other social media platform not yet in existence but that serves similar purposes

Questions regarding whether a platform or tool constitutes social media and is covered by this Policy should be directed to the Communications and Business Technology Solutions Departments.

**POLICY REQUIREMENTS & PROCEDURES**

A. O. Smith’s Guiding Principles and all Corporate Policies and procedures, specifically including those regarding antitrust, conflicts of interest, insider trading, confidential information, intellectual property, harassment and discrimination, and retaliation, apply to Employee activities conducted online. Employees must adhere to all such policies when utilizing the A. O. Smith Network, including visiting internet websites, and utilizing Social Media sites.

Employees must use good judgment when online for both work and personal purposes. The specific requirements for use of A. O. Smith’s Network and the use of Social Media are outlined below. However, regardless of whether an employee is utilizing A. O. Smith’s Network, he/she must always ensure the protection of A. O. Smith, including its proprietary and confidential information. **The transmission of customer-sensitive material or any other proprietary commercial information outside of A. O. Smith 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.**

I. Use of A. O. Smith Network

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),
the Company’s enterprise WeChat Platform (if located in China), the China OA system, and
access to 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.

All A. O. Smith employees, contractors and business associates who use the A. O. Smith
Network must comply with the expectations outlined herein. If you have any questions on how
this Policy applies to you, please contact the Legal or Human Resources Department.

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. Use of Company Logos:

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.

4. Use – Business or Personal:

The A. O. Smith Network is provided at A. O. Smith’s expense and is to be used primarily to
conduct A. O. Smith business. Personal use of the A. O. Smith Network (examples include
visiting websites such as Yahoo®, Google®, Sogou, Facebook, LinkedIn, SnapChat,
Instagram, WhatsApp, Twitter, Wechat, Baidu, RenRen, Weibo, Bing, or other Social Media
while connected to the A. O. Smith Network) may be allowed, but should be limited to
reasonable use and time. A. O. Smith reserves the right to limit or prohibit personal use of the
A. O. Smith Network at any time. A. O. Smith employees are prohibited from using 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:

Communications while 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. 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 whereby 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:

To the extent allowed by law, 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, received, or stored on the A. O. Smith Network without prior notice to the originators and recipients of such messages. To the extent allowed by law, 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.
- Install unauthorized software, hardware, programs or inappropriate content on an A. O. Smith-issued device.
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 any applicable A. O. Smith retention policy, including the Global Policy 15, “Records Management.”

10. Misuse, Unauthorized Access, Viruses, Tampering, and Breaches:

Misuse or unauthorized access to the A. O. Smith Network, the use of viruses, attempts to breach system security, and/or other malicious tampering with any system on the A. O. Smith Network is expressly prohibited. Employees must immediately report any such activity to the appropriate A. O. Smith Service Desk.

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<tr>
<th>Region</th>
<th>Service Desk</th>
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<tr>
<td>North America</td>
<td><a href="mailto:servicedesk@aosmith.com">servicedesk@aosmith.com</a> 1-800-365-7886</td>
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| China        | WPC: sec@hotwater.com.cn +86-025-8580-8185  
               | CEP: sec@aoswtc.com +86-025-5623 1627 |
| India        | itsupport@aosmithindia.com +91-80-28011296 |
| Europe       | support@aosmith.nl +31 402942511 |
| Vietnam      | hieunm@macservice.vn +84 24-668-72-600 |
| Hong Kong    | pso@microware.com.hk (852) 2564-4584 |

The A. O. Smith Service Desk will handle each incident in accordance with the A. O. Smith Incident Response Plan (IRP). The IRP is the document used for guidance on security incident reporting and escalation procedures and is managed and maintained by the Information Security group.

11. Consent to use AOSNET, A. O. Smith’s Enterprise WeChat Platform, China’s OA System, and Other Internal Network’s or Platform Systems:

By using AOSNET, Company’s enterprise Wechat platform, China’s OA System, or any other internal network or platform system, each employee agrees that the employee has read, understands, and agrees to the terms set forth in this Policy. Employees acknowledge that using A. O. Smith’s Network and related systems 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, A. O. Smith’s Enterprise WeChat Platform, China’s OA System, and any other internal network or platform systems automatically terminates upon separation from A. O. Smith.
II. Use of Social Media

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’s expectations related to appropriate communications through Social Media networks and other online activities (whether at work or at home). The requirements in this Section should be read in conjunction with the Guiding Principles and related policies and procedures, specifically including Global Policy 02, “Antitrust,” Global Policy 07, “Insider Trading,” Global Policy 10, “Disclosure of Material Information,” Global Policy 16, “Trademark and Copyright,” and Global Policy 15, “Records Management.” Employees must not disclose any non-public information of the Company through Social Media networks or through other online activities that could be viewed by non-A. O. Smith Employees. Such disclosure could severely damage A. O. Smith in the marketplace and put the Company at a competitive disadvantage.

Conduct that adversely affects an Employee’s job performance, the performance of fellow employees, or otherwise adversely affects customers, suppliers, people who work on behalf of A. O. Smith, or A. O. Smith’s legitimate business interests may result in disciplinary action up to and including termination.

2. Business and Personal Use:

Use of Social Media by A. O. Smith employees is permitted and encouraged where such use is specifically authorized by A. O. Smith, has a suitable for business purposes (such as brand/product promotion) and supports the goals and objectives of A. O. Smith and its business units. Unless specifically authorized by A. O. Smith to publish content on Social Media or through other online activities for A. O. Smith’s business purposes, Employees utilizing Social Media do so at their own risk and are personally responsible for the content they publish.

Any Employee utilizing Social Media (whether for work or personal purposes), must adhere to the A. O. Smith’s Guiding Principles and Company Policies, including those regarding anti-harassment, conflicts of interest, non-retaliation, regardless of whether the post or communication takes place on or off Company premises, or before or after scheduled work shifts. Specifically, 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. Employees should also adhere to the Terms of Use of the site and respect the cultural and behavioral norms of the Social Media platform being used.

The Company respects the right of its employees to utilize Social Media for personal purposes, but those 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. Remember that A. O. Smith customers, colleagues and supervisors often have access to the online content Employees post, even if they are not the intended reviewer of such content.
Employees, managers and executives, by virtue of their positions, must also consider whether personal thoughts they publish on Social Media sites 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.

The Company reserves the right to monitor publicly available posts and comments made on Social Media sites by its Employees.

3. 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 through Social Media 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 Social Media on behalf of another A. O. Smith employee, or an employee of an A. O. Smith business partner or competitor without their permission.

4. 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 or the corporate leader of the country from which the media request was originated. Employees must comply with any relevant local policies around media requests and shall not respond to the request for information without the express authorization of Management.

5. Guidelines for Referring to the Company in Social Media:

Unless authorized by the Company to do so, employees shall not use Social Media to speak on behalf of the Company or hold themselves out as representing A. O. Smith's views. Employees must be mindful as to who they are representing when using Social Media.

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), and Employees should be mindful as to who they are representing. Employees not authorized to speak on A. O. Smith’s behalf but who make reference to A. O. Smith on Social Media sites shall do so at their own risk.

Once you are no longer an employee of A. O. Smith, you shall no longer hold yourself out or represent yourself as an employee or a representative of A. O. Smith.
6. Use of Company Intellectual Property:

Employees must adhere to the Guiding Principles and **Global Policy 15, “Copyright and Trademark”** when using any words, logos, or other marks of A. O. Smith or other companies. 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 Legal Department and the Director of Corporate Communications, or the corporate leader of the country from which the request originated.

**TRAINING AND REPORTING VIOLATIONS**

A. O. Smith Employees may periodically be required to certify compliance with this Policy and otherwise complete comprehensive training, as necessary and appropriate, and as determined by the Legal Department, Human Resources Department, or Business Technology Solutions Department.

Violations of this Policy may result in suspension of the A. O. Smith Network privileges, Social Media use, and/or other disciplinary action up to and including termination of employment from A. O. Smith. 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.

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**

A. O. Smith reserves the right to change this policy at any time. The General Counsel of A. O. Smith Corporation, and Senior Vice President of Human Resources and Public Affairs at A. O. Smith Corporation, are responsible for the implementation of this policy. The Chief Information Officer at A. O. Smith Corporation is responsible for the availability and management of the software and hardware that supports the A. O. Smith 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 GENERAL COUNSEL OF A. O. SMITH CORPORATION, THE SENIOR VICE PRESIDENT OF HUMAN RESOURCES AND PUBLIC AFFAIRS AT A. O. SMITH CORPORATION, AND CHIEF INFORMATION OFFICER AT A. O. SMITH CORPORATION.