



IT & Electronic Communications Policy

Objective

Apogee Integration, LLC (APOGEE) provides and maintains the following forms of electronic communication, messaging agents and electronic facilities: internal and external electronic mail (e-mail), telephone voice mail, Internet access, and computer hardware and software. As a condition of providing this technology, Apogee Integration enforces certain restrictions on its workplace use and restricts such use to company business purposes.

Scope

This policy must be followed in conjunction with other APOGEE policies governing appropriate workplace conduct and behavior. APOGEE complies with all applicable federal, state and local laws as they concern the employer/employee relationship, and nothing contained herein should be construed to violate any of the rights or responsibilities contained in such laws.

Procedure

The internal communication systems, as well as the equipment and data stored, are and remain at all times the property of APOGEE. All messages and files created, sent, received or stored within the system should be related to company business and are and will remain the property of the company. System or companywide distribution of e-mail or other electronic messages (announcements, bulletins, etc.) requires approval of a senior vice president or higher in advance of the distribution.

Company access

APOGEE reserves the right to retrieve and review any message or file composed, sent or received. Although a message or file has been deleted or erased, it is still possible to recreate the message. Therefore, ultimate privacy of messages cannot be assured to anyone. Although e-mail and voice mail may use passwords for security, confidentiality cannot be guaranteed. It is possible for messages to be retrieved and viewed by someone other than the intended recipient. Furthermore, all employee passwords can be reset and accessible by the company even in the absence of an employee.

Guidelines for appropriate use of e-mail

When using APOGEE e-mail and other forms of electronic communication, appropriate workplace etiquette must be observed. The guidelines for appropriate and effective e-mail and other forms of electronic communication include:

- Communicating urgent matters for immediate response, communicating with several people quickly or communicating other time-sensitive matter.
- Keeping all messages as brief as possible to minimize reading time, thereby keeping communication efficient.
- Using the simple rules of who, what, when, where and why to answer any anticipated questions.
- Avoiding sensitive subject matter that should be addressed in person, if possible.
- Checking message content for accuracy and good business writing style (i.e., using correct grammar, spelling and punctuation).
- Following up when a response is expected or requested and has not been received in a timely manner.
- Reading all messages and responding when requested or expected.
- Avoiding the use of all capital letters.
- Avoiding the “reply all” function (i.e., systemwide distribution) when not necessary or intended.
- Saving, printing or deleting messages after reading to avoid using the e-mail server as permanent storage.

Guidelines for appropriate use of the Internet

Though APOGEE encourages employee and guest use of the Internet, its use is restricted to the following:

- Communicating with employees, vendors or clients regarding matters within an employee’s assigned duties.
- Acquiring information related to, or designed to facilitate, the performance of regularly assigned duties.
- Facilitating performance of any task or project in a manner approved by an employee’s supervisor.
- Participating in Training exercises and research.

Prohibited Use of E-Mail, Voice Mail, Internet and Other Electronic Communications

E-mail, voice mail and other electronic communications transmitted on APOGEE equipment, systems or networks may not contain any content that would reasonably be considered offensive, harassing or disruptive to another individual. Offensive content would include sexual comments or images, racial slurs, gender-specific comments, or any comments that might be construed as offensive by a reasonable person based on race, age, sex, sexual orientation, religious or political beliefs, national origin, or disability.

Regarding Internet and e-mail access and use, employees and guests should be advised that the company expressly prohibits use of the APOGEE -provided Internet and e-mail for the following activities:

- Dissemination or printing of copyrighted materials, including articles and software, in violation of copyright laws.
- Sending, receiving, printing or otherwise disseminating proprietary data, trade secrets or other confidential information of APOGEE or its business counterparts in violation of company policy or proprietary agreements.
- Using offensive or harassing statements or language, including disparagement of others based on their race, national origin, sex, sexual orientation, age, disability, religious or political beliefs.
- Sending or soliciting sexually oriented messages or images.
- Operating a business, usurping business opportunities, soliciting money for personal gain or searching for jobs outside APOGEE.
- Sending chain letters or e-mails.
- Gambling or engaging in any other activity in violation of local, state or federal law.
- Circulating jokes, comics or nonjob-related computer graphics.

Consequences for Violations of Electronic Communications Policy

Disciplinary action for violation of this policy may include guest removal from the facility, termination, suspension or transfer of the offending employee. In cases involving less serious violations, disciplinary action may consist of a warning or reprimand. Remedial action may also include counseling, changes in work assignments or other measures designed to prevent future misconduct. The measure of discipline will correspond to the gravity of the offense as weighed by its potential effect on APOGEE and fellow employees and guests.

Nothing in this policy should be construed to prohibit conduct that is expressly permitted or protected under applicable federal, state or local laws.