

Social Media Policy

Social media may be used by Farmers & Merchants Bank employees for business and personal purposes subject to the restrictions set forth in this policy for responsible use. These restrictions are intended to ensure compliance with privacy and confidentiality agreements, adherence to relevant laws and regulations, protect Farmers & Merchants Bank brand, and ensure the most effective use of these technologies. Social media includes digital spaces such as blogs, discussion forums, social networks, chat rooms, and other similar technologies.

SCOPE

This policy document specifically refers to requirements for participating in such media that are Bank sponsored and in media that are non-Bank sponsored but where the employee's affiliation with the Bank is known, identified, or reasonably presumed by either the Bank or the public at large.

References to "social media" herein encompass any electronic communication medium or environment whereby information or discourse may be exchanged between two users or among a larger group of users, generally resulting in sustained user-generated content. Examples of social media include but are not limited to:

- Social networking sites (MySpace, Facebook, Google+)
- Blogs and message boards
- Microblogs (Twitter)
- Chat rooms (AIM chat and similar)
- Social bookmarking (Digg, del.icio.us, Reddit)
- Wikis (Wikipedia and similar)
- Media sharing (YouTube, Flickr, Tumblr)
- Instant Messaging (AIM, MSN Messenger)
- Mobile versions of the above categories

GENERAL PROVISION

Farmers & Merchants Bank employees and contractors are expected to adhere to all rules that apply to other Farmers & Merchants Bank communications when participating in social media, specifically: respecting co-workers privacy, respecting customer privacy, protecting confidentiality and security, safeguarding and proper use of the Banks information and assets. All social media activities should be conducted in accordance with the following guidelines.

Farmers & Merchants Bank's social media and web presences are maintained in the interest of establishing a community forum in which the Bank's employees, customers, prospective customers, partners, the media, and the broader community may engage in relevant dialogue toward intelligent and productive conversations. The Bank presence is governed by the principles of community, constructive dialogue, transparency, and education.

RULES OF ENGAGEMENT

By posting to social media, the participant becomes a de facto representative of Farmers & Merchants Bank. As such, the participant will be held to the following standards. Noncompliance with these standards or behavior that otherwise conflicts with the Bank's mission and values, violates administrative policies and procedures, and/or compromises the privacy and security of the institution, employees, or customers, will be subject to corrective action, including but not limited to disciplinary action, revocation of official social media privileges, or termination. The following requirements apply to employees and contractors using social media while at work or away from work when the employee's affiliation with Farmers & Merchants Bank is known, identified, or reasonably presumed by either the Bank or public at large.

Company Time

The amount of time allowable for social media participation is at the discretion of managers and should be correlated with the degree of responsibility associated with a social media role. Regardless of allowed time, participation should not interfere with regular roles and responsibilities.

Disclaimer

No postings by the Bank's employees should be consumed as professional advice. The opinions expressed by the participants are purely their own and do not necessarily reflect the opinions of Farmers & Merchants Bank or its management. The Bank does not necessarily endorse any comments made by its employees, customers, or other participants in this forum. All statements and viewpoints expressed herein are strictly those of the commenter alone, and do not constitute an official position of Farmers & Merchants Bank.

All communication to social media channels by employees and/or contractors, outside of official Bank communication, should include some variation of the above disclaimer when their communication may be construed as official Bank communication.

Participant Code of Conduct

This social media space is a public forum. By participating in discourse herein, the participant implicitly agrees to adhere to the following rules:

- Participant must not disclose any information that is confidential or proprietary to the organization or to any customer or vendor that has disclosed such information to the Bank. Review the Bank's policy on confidential and proprietary information for guidance.
- Any communication occurring in a public forum such as those identified previously in this policy must be respectful to the Bank, fellow employees, our affiliates, and our business partners.
- The Bank may request at any time that the participant cease any communication concerning the company on Social Media sites or require the participant to block access to such communication if the Bank believes that such action is necessary to ensure compliance with government regulations or other laws.
- Do not use the Bank's trademarks or any official marketing material on any personal communication or reproduce any company material.
- Do not use Social Media portals for communication with fellow employees or customers concerning business matters. Such communication must go through normal channels such as e-mail to comply with archiving requirements.
- Please refrain from using obscenity or profanity, from engaging in "flaming" other participants, from issuing insults or calling names, and from posting content that is off-topic or could be offensive.
- Please remember that this is intended to be a civil, constructive dialogue among community members. The participant is welcome to disagree with any viewpoints expressed, but please do so in a respectful manner.
- Please refrain from disclosing any information that could jeopardize the participant's privacy, the privacy of any affiliated organizations, trade secrets, or any other confidential or proprietary information.
- For protection of the participant and the bank, do not post any copyrighted material unless the participant holds the copyright, has written permission from the copyright holder, or is sure the material is permitted by "fair use".

BANK SPONSORED SOCIAL MEDIA PRESENCE

Comment Management

While the Bank encourages posts and responses from a wide range of audience members with various perspectives, the Bank reserves the right to edit or delete any posts containing inappropriate language (including but not limited to insults, "flaming", profanity, or obscenity), content that is off-topic, could be construed as slanderous, discloses trade secrets or other confidential information, Spam, or other inappropriate postings. The Bank will make every effort to contact the contributor of an edited or deleted post to communicate the motivation behind the alteration. As such, all participants are encouraged to include their first name and an email address.

Guiding Principles

In its social media participation, the Bank will strive to:

- Have open and honest dialogue.
- Correct inaccurate or misleading content in a diligent and timely manner. The Bank will not delete posts unless the posts violate Bank policies. Any changes or additions will be marked clearly.
- Disclose any conflicts of interest.
- Provide relevant and original material and appropriate cite/attribute material made available via other social media presences and web sites.
- Use good judgment in posts and respond to comments in a respectful and timely manner.
- Trust the participant to be respectful in participation and to be mindful of the information the participant puts forth in this medium.
- Respect the participant's privacy in this medium.

Quality Control

Right to manage content: Due to the live nature of the social media, changes may be made immediately and followed up with participant notification. Such notification will be communicated via email to the participant, explaining the reason for the change and offering the participant opportunity to protest the alteration. The post will be reinstated with the Bank's explanation of the discrepancy.

Damage Control

The Bank maintains a policy of responding responsibly to legitimate negative posts listed on the social space, including but not limited to, service or product complaints, "flaming", or attacks on customer, institution, or employee character. These responses will come from an appropriate Bank Officer and should include a public invitation to correspond by email or phone (as determined by that participant) to settle the issue outside of the forum.

Mandated response

All external posts (those by customer, media, and the general public) should be dignified with at least one response in an effort to encourage participation in the medium. If an external post is unaddressed for a period of one week, bank management will assign a respondent to attend to the post.

Future Litigation

Social media content is perpetual. It sticks around forever so what is said can and may be used against the participant. Do not post anything that could be potentially harmful to reputations or that disclose the bank practices, etc.

HUMAN RESOURCES ISSUES

Although Farmers & Merchants Bank's presence is a corporate representation, the participant assumes personal liability for anything posted by the participant. The Bank will assume no responsibility for the content published by the participant. The Bank's presence as institution-sponsored media and the content therein remain under the governance of the policies of Farmers & Merchants Bank. Any editing or removal of a post will not be made with malice or with the intent of limiting free speech, and by participating, the participant agrees to not hold Farmers & Merchants Bank liable for any such post alterations, including but not limited to, infringement of free speech or discrimination. The Bank reserves the right to monitor any social media presence for violations of this or other Bank policies. The Bank reserve the right to review the conduct of any participant not adhering in good faith to this and other institution policies and take action in accordance with those policies.