



VALMONT INDUSTRIES® SOCIAL MEDIA GUIDELINES

Guidelines for functioning in an electronic world are the same as the values, ethics and confidentiality policies employees are expected to live every day. Your responsibility to Valmont® doesn't end when you are off the clock. In an effort to avoid problems and misunderstandings, Valmont's Digital Governance Committee has established a few guidelines to provide helpful and practical advice for both company-sponsored social media and personal use.

What You Should Do:

- Disclose your affiliation. When you discuss Valmont or brand-related matters, you must identify yourself with your name and your role at Valmont when relevant. For instance, you should identify your affiliation when providing information regarding a product, but it's not necessary when adding a brief congratulatory comment.
- State that it's your opinion. Only very few people in this company are official spokesperson for Valmont and/or its brands, so you must make it clear that you are speaking for yourself if you are not a designated representative. You can use a disclaimer like "The postings on this site are my own and do not necessarily represent the position, strategy or opinions of Valmont Industries and its brands". Please always write in the first person and do not use your company email address for private communications.
- Act responsibly. You are personally responsible for the content you publish on forums, blogs, or any other user-generated media. Please remember that the internet never forgets, so everything you publish will be visible to the world for a very long time. Common sense prevails. If you are about to publish something that makes you the slightest bit uncomfortable, don't.
- Respect your audience. Do not use ethnic slurs, personal insults, obscenity, or engage in any conduct that would not be acceptable in the workplace. You should also show proper consideration for other's privacy and for topics that may be considered objectionable or inflammatory (like religion or politics). If you are in a virtual world as a Valmont representative, please behave accordingly. We all appreciate respect.
- Honor copyright. If it is not yours, don't use it. Before posting someone else's work, please check with the owner first. Posting implies authorship, while sharing is a distribution method. Sharing is providing the original post with your social media consumers with or without your comments added.
- Protect yourself. Be aware that others will associate you with your employer when you identify yourself as such. Please ensure that your online profile and related content is consistent with how you wish to present yourself to customers and colleagues.

- Be clear. Words mean different things to different people. Be sure that your message is relayed explicitly and concisely.
- And finally, please act responsibly. Remember that anything you publish about Valmont Industries can potentially harm the company.

What You Should Never Disclose:

- Confidential Information. Just because information is on the internal network (like VO), it is not acceptable to let the rest of the world know about it. If an item features the sentence "for internal use only", then it is not meant to be forwarded to anyone who is not employed by Valmont. No exceptions. If you have signed a confidentiality agreement, you are expected to follow it. Please act responsibly with entrusted information.
- The Numbers. Non-public financial or operational information. This includes strategies, forecasts and most anything with a dollar-figure attached to it. If it's not already public information, it's not your job to make it so.
- Legal Information. Do not comment on work-related legal matters unless you are an official spokesperson and have the legal approval by Valmont or its brands to do so. In addition, talking about revenues, future products, pricing decisions, unannounced financial results or similar matters will get you, the company or both into serious trouble. Avoid discussing financial topics and predictions of future performance at all costs.
- In essence, if you are wondering if you can share something you learned at work...don't. Follow Valmont Industries' policies and abide by our core values. If you do not follow the guidelines outlined above, the outcome can be:
 - Termination.
 - Legal trouble with and/or loss of customers, shareholders, and/or investors.

Valmont reserve the right to determine what is and what is not acceptable and appropriate content and will notify employees when action will be taken.

Also note, any new social media accounts with a Valmont brand name must be approved by the Digital Governance Committee *before* creation. Each request will be evaluated based on the business need and the resources allocated to managing the account. Please email digitalgovernance@valmont.com with your new account request.

Please email digitalgovernance@valmont.com with any questions and/or concerns.