

## CORNERSTONE ONDEMAND Social Media Guidelines

MAY 2012

Chances are you're already using social media sites like Facebook, LinkedIn, Pinterest and Twitter\* to find new connections, update your network, or share your life with friends and family. And if you are, you already know what powerful communications tools social networks can be.

The same goes for social media participation in your professional life, which is why Cornerstone OnDemand encourages our employees, clients, resellers and everyone else interested in our business to engage in and add value to the conversations that matter most. We want you to have the power to build a network and a following while also fostering business relationships and a pipeline of potential leads. As a leading software innovator, we're committed to driving the evolution of our industry – an evolution that's being driven by social media. We view it not only as a communications tool, but as a competitive advantage, putting a face – and giving a voice – to the company. That's where we need your help.

These guidelines are intended to offer a simple way for us to get the most benefit out of participation in social media, while minimizing the risk of liability – both to the company and to you – or potential embarrassment to our employees, clients or shareholders. At the same time, these guidelines are not intended to preclude you from engaging in any legally protected activity.\*\*

We know you have common sense. Accordingly, the guidelines are designed to inform and inspire your participation in social media conversations, whether you are:

1. Using social media tools for business or personal use
2. Using social media tools specifically for personal use
3. Using social media tools specifically for Cornerstone business purposes

You'll find that the guidelines, based on emerging best practices and those developed by leading social media early adopter organizations, are intentionally few and are basically an extension of the values and culture that inform our work every day. At the same time, these guidelines are serious, and it is extremely important that you follow them. Failure to do so may result in disciplinary action and/or dismissal.

But don't let that scare you. We're here to help, and we have tools, education and guidelines for company-sponsored blogs and other types of social media activities that you'll find helpful (and even interesting). If you have any questions, or if you want to establish or participate in social media channels representing Cornerstone, please contact [socialmedia@csod.com](mailto:socialmedia@csod.com).

Please note that all direct communication with the financial community (such as analysts and investors) may only be conducted only through Cornerstone's investor relations team. All direct communication with media (including bloggers) must be conducted and/or coordinated through Cornerstone's corporate communications and social media teams.

This is a working document designed to evolve along with social media technologies and channels. If you have any questions, please do not hesitate to ask.



## GUIDELINES FOR PERSONAL & BUSINESS USE

This section describes the requirements that are most relevant to Cornerstone employees participating in social media for both personal and business use.

- **THINK FIRST.** Remember that you are publishing in a public forum, so don't publish anything that you wouldn't want to be viewed by your family, colleagues or the general public. Common sense should always rule. If it gives you pause, pause rather than publish.

When you are online, you are on the record – everything on the Internet is public, searchable and permanent. And since content is easily transferred and replicated across the Internet, it is nearly impossible to delete content once it has been published. Before you publish, stop and think how your post will reflect on you, the company, and its current and potential clients.

- **PROTECT CONFIDENTIAL INFORMATION.** You may not use social media to disclose or publicly comment on confidential information about Cornerstone or its clients. This includes nonpublic financial information such as revenue, earnings and financial forecasts, and anything related to client strategy, products, policy, management and operating units that have not been made public. Disclosure of such information could result in liability for you and for Cornerstone under the securities laws.

You must not comment publicly on any Cornerstone mergers and acquisitions activity, including potential or pending M&A, regardless of the status. Any commentary on what a transaction or potential transaction may mean to Cornerstone – whether positive, negative or neutral – can be problematic.

Protecting the confidential information of our employees, clients, resellers and suppliers also is important. Do not mention them, including Cornerstone executives or client executives, in social media channels without their prior written permission, and make sure you don't disclose items such as sensitive personal information of others or details related to Cornerstone's business with its clients.

- **RESPECT THE PRIVACY OF OTHERS.** Do not violate the privacy rights of other people by posting their personal image without their permission or sharing their personal information.
- **REFRAIN FROM OBJECTIONABLE OR INFLAMMATORY POSTS.** Do not post anything that is false, misleading, obscene, defamatory, profane, discriminatory, libelous, threatening, harassing, abusive, hateful or embarrassing to another person or entity. Make sure to respect the privacy of others. Be aware that false or defamatory statements or the publication of an individual's private details could result in legal liability for Cornerstone and for you.
- **FOLLOW TERMS OF SERVICE:** Pay close attention to the terms of service for the Web site or online community in which you're participating. That means staying compliant with copyright laws and posting terms. In particular, when engaging in private or closed groups on sites like LinkedIn or Facebook, you may not solicit members or directly promote our products and/or services.

A good rule of thumb: if the group is private, do not initiate posting, engage with members directly or share any business-related information.

- **RECOGNIZE YOUR LEGAL LIABILITY.** Recognize that you are legally liable for anything you write or present online. Employees can be disciplined by the company for commentary, content or images that are defamatory, pornographic, proprietary, harassing, libelous or that can create a hostile work environment. You can also be sued by company employees, competitors, and any individual or company that views your commentary, content or images as defamatory, pornographic, proprietary, harassing, libelous or creating a hostile work environment.

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## GUIDELINES FOR PERSONAL USE

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This section describes the requirements that are most relevant to employees participating in various kinds of social media channels for personal use that is unrelated to your role as a Cornerstone employee.

- **IF IT'S PERSONAL, KEEP IT PERSONAL.** If you are commenting about non-business related matters (such as on travel or entertainment sites), use your personal e-mail address and refrain from representing yourself as a

Cornerstone employee. While your entries in this regard are your own, please remember that such statements or actions may become widely distributed and affect you professionally. Hence, use good judgment.

- **DON'T MISUSE COMPANY RESOURCES.** Personal social media activities must not interfere with your work or productivity at Cornerstone. Don't use company resources to set up your own social profiles or presence.

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## GUIDELINES FOR CORNERSTONE BUSINESS USE

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This section describes the requirements that are most relevant to company employees participating in various kinds of social media activities for Cornerstone business purposes.

- **FOLLOW COMPANY POLICIES.** The company's corporate policies apply to your online conduct (blogging or other online activities) that could affect the company just as much as they apply to your offline behavior. Make sure you are familiar with them.
- **DO NOT SPEAK FOR CORNERSTONE.** You are not an official spokesperson for Cornerstone. Make it clear that your opinions are your own and do not necessarily reflect the views of the company. If you publish to a Web site, please use the following disclaimer: "The postings on this site are my own and do not necessarily represent my employer's positions, strategies or opinions."
- **BE TRANSPARENT.** Do not post anonymously. Use your real name and be clear about your role. If you have a vested interest in something you are discussing, be the first to point it out and be specific about what it is. Also stick to your area of expertise and write what you know.
- **ADD VALUE.** By identifying yourself as a Cornerstone employee, you are creating perceptions about the company and about your expertise. Your own "brand" and your

association with Cornerstone are the sum total of what you share and how you share it.

Offer interesting and useful information, as well as your own ideas and perspectives that may enlighten and inspire others. Feel free to reference and share any Cornerstone content published on any of our external Web sites. (Reminder: Do not use or discuss Cornerstone confidential or proprietary information.)

- **USE COMMON SENSE.** There can be a fine line between healthy debate and incendiary reaction – always remember to be careful and considerate. If you make a mistake, admit it. Be upfront and quick with your correction.

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*\* The absence of explicit reference to a particular site does not limit the application of this policy.*

*\*\* Nothing contained in this policy shall preclude an employee from engaging in conduct protected by Section 7 of the National Labor Relations Act or similar laws in other jurisdictions.*