



Reputation management: Social Media Global Guidance



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Executive summary

Achieving our ambition of being the most trusted and distinctive global professional services organization entails building and protecting our brand. Online conversations help us promote EY thinking and capabilities, build stronger relationships and connect with potential clients or employees. At the same time, reputational risks are increasing and being driven by global connectedness. Social and online media enables news to travel faster and further.

All EY people have a role to play in protecting and promoting our brand and interests through their personal and professional actions.

This guidance articulates the recommended considerations and actions relating to reputational management for all EY people across all member firms with respect to social media. This is one of two parts of policy and guidance related to reputation management; the other is a policy on external media engagement. This Social Media Global Guidance updates and replaces our previous social media guidance from 2016, which has now been archived.

This Global guidance supports the principles set out in the EY Global Code of Conduct including:

- ▶ We uphold the EY reputation. We do not misrepresent the position that EY takes in professional and other matters.
- ▶ We promote a culture of consultation. We address questions of ethics and consult appropriately to help resolve them.
- ▶ We understand and comply with all applicable laws, regulations and standards and all EY policies, guidance and procedures.
- ▶ We avoid relationships that impair - or may appear to impair - our objectivity and independence.
- ▶ We are alert for and manage possible personal and professional conflicts of interest.

What is reputational risk?

Reputational risk is the possibility of negative perception of EY on the part of its stakeholders or the broader public due to an event, conduct, action or inaction by, or concerning, EY or any EY person. Perceptions of our behavior can lead to significant negative media and social media coverage, loss of trust by stakeholders and confidence in EY, disruption to or loss of the normal flow of business, regulatory inquiries and damage to the EY brand. We must recognize that the reputation of EY is at risk not just by our behavior objectively, but also the perception of our behavior.

Social media

Social media, for purposes of this guidance, includes any technology that facilitates the creation or sharing of any form of content in a virtual platform. Online publishing/social media activities (“posts” or “postings”) include, but are not limited to:

- ▶ Personal blogs and websites
- ▶ Social networking sites and platforms (e.g., Twitter, Facebook, LinkedIn, Instagram, WeChat, YouTube, SnapChat, WhatsApp, Yammer)
- ▶ Online dating sites
- ▶ Blogs (e.g., Tumblr, Wordpress, Medium, Weibo)
- ▶ Discussion/chat forums (i.e., Glassdoor, Fishbowl, political, non-political or other)
- ▶ Image-sharing sites (e.g., Instagram, Pinterest, Flickr)
- ▶ Content aggregation and social bookmarking sites (e.g., Reddit, Digg)
- ▶ Comments/remarks on any public domain, social networking site, microblog, forum, content-sharing site, aggregator, news site or other

What you post and how you use social media matters. When using social media accounts, all EY people should assume that clients, colleagues, regulators and the public have access to the posted online content. Information originally intended just for friends and family can be forwarded on, commented on and screen shots captured. Therefore, due care and sound judgment must be exercised when engaging in all social media activities. You should assume that what you post or publish will be publicly available forever, and information can be forwarded extensively regardless of the privacy settings used on social media accounts.

New joiners to EY should take time to consider their previous online activity and profile in light of this guidance (including review of previously posted content that may be contrary to EY values or might create potential conflicts or independence concerns) and make appropriate adjustments. Be aware that content posted before joining EY could now be attributed to EY.

EY people are expected to maintain the values of the EY Global Code of Conduct and uphold the EY reputation.

A) How to conduct yourself online

How you conduct yourself online should be guided by good judgment, common sense and the EY Global Code of Conduct. The examples outlined below illustrate how these principles are put into action.

- ▶ Do not post false or defamatory material about EY, EY personnel, clients or competitors, such as personal attacks, derogatory or disparaging statements, or content that is threatening.
- ▶ Be mindful of the EY commitment to inclusiveness: we respect one another and strive for an inclusive environment free from discrimination, intimidation and harassment. Mistreatment based on gender and gender identity/expression, sexual orientation, nationality, religion, other identity dimensions defined and constructed by some societies in ethnic, color, cultural or racial terms, or any other form of mistreatment of people based on perceived differences in human characteristics is not tolerated.
 - ▶ Respect and civility should always be used in communications of any form and at all times.
- ▶ EY people are advised to use sound judgement when expressing personal views on politics or policy on social media. Be mindful of our guidelines and policies which make clear that EY people may not speak for, or appear to speak for, EY unless authorized by EY or member firm leadership to do so or otherwise engage in speech that would violate our Code of Conduct.
 - ▶ If you're in an EY leadership position, there is an increased risk that public political or policy-related comments may be interpreted to be those of EY. Leaders should speak with member firm or EY leadership before discussing topics such as, but not limited to, politics or policy on social media or elsewhere.
 - ▶ All EY people should use sound judgment and consider wider implications to EY.
- ▶ Consider how you represent yourself online, even in your personal profiles, and how your postings could reflect on you professionally and on your career.
 - ▶ Avoid posting information or content that creates the appearance of improper conduct.
- ▶ Do not use social media to comment on any EY confidential information including non-public business matters about EY (e.g., business plans, performance, legal or regulatory matters).
- ▶ Do not use social media to comment on any confidential information or non-public business matters about any EY client or other third party.
- ▶ Do not share/leak confidential EY information, including EY internal communications (written or oral), on social media. This includes all confidential and sensitive material relating to clients, governments, partners, people and any competitive or business sensitive material (e.g., any EY internal communications policies, or other such documents).
- ▶ EY and its professionals must not comment on clients on social media.
- ▶ Verify that any posts you make about EY, its people, products or services are factually accurate, and SCORE approved when applicable:
 - ▶ Social media posts of EY people and any content they share via a personal social media profile are subject to SCORE if they are, or could be perceived to be, representing EY. EY people are, therefore, encouraged to share official EY social media posts and SCORED assets available via the Global, Area or local BMC team or other functions.
 - ▶ Original social media posts and comments that are intended to speak for or represent EY, with content other than approved suggestions or posts by the Global, Area or local BMC team or other EY functions, should be submitted to SCORE.

- ▶ Blogs appearing on LinkedIn or similar professional network sites require SCORE if they promote, represent or speak for EY in any way. This includes the discussion of EY services, solutions, points of view (such as EY thought leadership) and examples from your role or function/team. LinkedIn blogs written in a personal capacity that do not promote, represent or speak for EY or your professional role should be consistent with EY values and the EY Global Code of Conduct.
- ▶ Any social media posts or blogs that are not intended to represent EY, but could be perceived as such, require a disclaimer to the contrary be included. In general, it is recommended you stay clear of anything that could be perceived as “professional advice.” For example, this includes offering tax guidance or recommending an audit tool. For more information on the use of a disclaimer, please see points below.
- ▶ EY people are expected to maintain the values of the EY Global Code of Conduct and uphold the EY reputation.
- ▶ When your profile on social media includes a reference to EY, accurately describe your role within EY (using terms that are common to your service line or industry rather than acronyms) and relevant professional experience and responsibilities.
 - ▶ When describing professional capabilities or experience, do not include the names of clients or disclose information that could be used to infer clients' names.
 - ▶ Demonstrate integrity when representing academic and professional degrees, certifications and professional affiliations online.
 - ▶ As soon as employment ceases with EY, former EY professionals should immediately update their social media profiles accordingly.
- ▶ When including employer details, refer to "EY" or the name of the local member firm; do not use "Ernst & Young."
- ▶ If your posts comment on a professional or business-related matter, verify that posts reflect your level of experience and area of knowledge.
- ▶ If your posts refer to EY, its people, products or services, or comment on a general business-related matter, appropriately reflect your level of experience and area of knowledge and be open and disclose your role at EY clearly and conspicuously, including adding a reference in the relevant biography or post that all views are your own: ¹
 - ▶ If you participate in a forum and appropriately comment on matters which are within the scope of interest for EY, and you have not identified yourself as an employee of EY, please include in your comments, "In my personal opinion, ..."
 - ▶ If you are contributing to online forums or blogs in a personal capacity using your subject matter specialism (i.e., providing ideas or advice on trouble-shooting IT problems or contributing to a technical blog on cyber issues), avoid references to Channel 1 client technology or clients projects, and use appropriate disclaimer language such as, "The views expressed [on this site/in this post] represent my personal opinions and do not necessarily represent the position of EY."
- ▶ The use of disclaimers does not eliminate or reduce in any way the need to always protect the reputation of EY – good judgment must always be exercised.

¹ You are not required to use a disclaimer when sharing EY-branded publications that are approved for external use on social media platforms. The necessary disclaimers are already included in these publications.

- ▶ Do not provide professional advice via social media platforms or provide comment to the media via social media platforms. If clients ask for advice or guidance via social media platforms, please respond via normal course of business channels such as email.
- ▶ EY thought leadership can only be shared if SCORE approved.
- ▶ Do not comment on business issues or matters outside your knowledge and experience.
- ▶ Be considerate of reputational risk when responding to comments (even in a personal capacity) on any posts related to, or posted by, EY clients.
- ▶ Use social media in accordance with the site's terms and be aware of the rights you give the site to your content and information. For example, in using many sites, you agree to give those sites wide permission to use photos, videos or other IP content that you post.
- ▶ Be a good online citizen. Adhere to the rules of the sites, networks and communities you participate in.

Other considerations

- ▶ Consult with a partner to whom you report, Risk Management or Legal if you have any concerns or use SCORE to confirm your post is appropriate.
- ▶ If approached directly by the media via personal or professional social media channels, such as a LinkedIn message, from a journalist, please refer it to your local media relations team.
- ▶ If approached directly over social media to participate in online, telephone or social media surveys which seek you to disclose or share information associated with EY business, services/solutions or those of its clients, do not participate. This will include surveys that imply they are aimed at helping potential clients evaluate EY services.
- ▶ When using LinkedIn or Twitter for professional purposes, refer to [5 steps to social media success](#) for leading practices.

B) How to manage EY or client confidential information on social media

- ▶ No posts should include EY client engagement-specific information or other confidential matters. If posts discuss EY business-related matters (e.g., industry trends, sharing of already approved external content, professional outreach), those posts must not identify EY clients, client location or other confidential or identifying EY or client information.
- ▶ Be mindful of posting personally identifiable information (e.g., phone numbers, home addresses) - both your own and those of others.
- ▶ Understand the privacy settings on each social network you use and periodically review them and adjust.
- ▶ Be aware when posting photographs and videos that the background, as well as geolocations, may allow a third party to infer confidential information about EY, EY services or its clients. Even if you refer to work in a generic way, images in the background of a photo or geolocation could reveal more information than you intended.
- ▶ Only use EY-authorized technology or solutions (such as EY Canvas or Microsoft Teams) to conduct EY business, and for all confidential, intracompany collaboration and client-related work or information exchanges. See the [Acceptable Use of Technology Global Policy](#) for more information.

Other considerations

- ▶ To the extent there is any question about the confidential nature of the information being considered for posting, you should consult with local Risk Management before posting.
- ▶ If information is posted in error (e.g., confidential information that should not have been posted) or business-related information that you later learn is inaccurate is posted, remove the post and

contact the partner to whom you report, Service Line leadership, Risk Management or General Counsel immediately to evaluate the potential impact and next steps.

C) Protect intellectual property and brand

EY owns and protects its intellectual property (IP), which comprises the collective experience, skill, knowledge and information of EY and its people, whether held in documents, maintained as a trade secret or embodied in our services. We strive to leverage these assets throughout our business in a way that maintains the value of our IP. We also respect the IP of others.

- ▶ Use the EY intellectual property (IP) only for EY business purposes and not for personal advantage. You have an obligation to refrain from retaining, misusing or disseminating the EY IP and confidential information, which continues beyond your employment with EY.
- ▶ Exercise good judgment when using the EY logos and work to ensure they are compliant with the latest visual identity (VI) guidelines or incorporate other trademarks when required on personal social media profiles.
- ▶ Before publishing or posting third-party material, including names, logos or ideas, work to ensure that legal rights have been considered. Where necessary, consult with Legal.

Other considerations

- ▶ If you have questions regarding the use of EY IP, consult with the partner to whom you report, local Risk Management or Legal.
- ▶ Refer to [The Branding Zone](#) for further guidance on the use of EY logos and VI including licensed and approved background images to upload on LinkedIn or other professional networking sites.
- ▶ See [Global guide to copyright compliance](#) or consult with Legal for guidance on how to avoid copyright infringement.

D) Independence

- ▶ You must adhere to the EYG Independence Policy with respect to your social media activity and be aware of how activity on personal social media accounts may impact the appearance of independence relative to audit clients.
 - ▶ Use good judgment when posting online as a consumer of an EY client's product or services, or as an attendee at a public event involving clients.
 - ▶ Avoid any post or reference that may be perceived as endorsing, promoting, advocating or "liking" any audit client you work on or its products or services.
 - ▶ Do not solicit audit clients that you work on (or its personnel) to post or reference anything that may be perceived as endorsing EY or any EY personnel (e.g., a LinkedIn recommendation).

E) Social Media activity by other EY people

- ▶ If you see social media content posted by others at EY that doesn't conform with the standards above, contact your local BMC representative who will escalate the issue appropriately. If you have concerns, you can also reach out to the [EY/Ethics Hotline](#).

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