

<b>Department:</b> Global Compliance and Risk Management (GCRM)	<b>Document Type:</b> Policy
<b>Title:</b> Social Media Policy	<b>Document No.:</b> CC001 <b>Effective Date:</b> 01/01/2016
<b>Location or Function:</b> Global	<b>Supersedes Document No.:</b> CC001 <b>Dated:</b> 02/06/2014

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### I. Purpose

Social media has changed the way we communicate, do business and interact with each other, patients, investors and other stakeholders both in and outside of the Shire network. We recognize the unique opportunities and benefits of social media and while we respect the rights of employees to use social media tools, we also believe there are certain risks associated with these channels.

It is important that you are aware of the implications of engaging in social media and online conversations that reference Shire, its brands, or its business. Every employee has a personal responsibility to be familiar with and comply with Shire's Global Social Media Policy.

This policy is designed to help you use these platforms in a responsible way as a Shire employee. This policy supplements the Shire Code of Ethics and it should be read alongside, and is complementary to, existing Shire policies regarding employment practices and behavior in the workplace. It is not intended to supersede them.

### II. Scope

This policy applies broadly to all employees globally and to third parties who act on our behalf, including but not limited to agencies, vendors, contractors and other partners. This policy is intended to include all forms of internal and external Social Media currently existing and forms not yet available or invented. This includes, but is not limited to Facebook, Twitter, LinkedIn, Pinterest, Instagram, Yammer, Wikipedia, CafePharma, blogs, open forums and discussion boards.

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**Consequences of Policy Violations:**

You are responsible for knowing Shire’s principles, rules and best practices before engaging in social media and you are personally liable for anything you post or present online. This applies to both internal and external Social Media. Shire may request that employees or its agents change or remove posts or comments that are inconsistent with this policy or that make inaccurate references to Shire, its brands, and/or stakeholders. Failure to comply with this policy may result in disciplinary action up to and including termination.

**III. Definitions**

Term	Definition
<b>Social Media</b>	Forms of electronic communication (as Web sites for social networking and microblogging) through which users create online communities to share information, ideas, personal messages, and other content (as videos). <sup>1</sup> This includes third-party technology platforms and applications; these may be inside or outside Shire’s network.
<b>Post</b>	Original, modified, or shared content distributed through social media. May include a combination of text, symbols, icons, emojis, emoticons, hashtags, images, photographs, infographics, etc.

**IV. Policy**

- Follow the Shire Code of Ethics and Use Good Judgment.** The Shire Code of Ethics as well as all other Shire [policies and guidelines](#) drive our behavior and good judgment in the use of Social Media. Your online activities may impact your personal reputation and image and could affect Shire’s reputation. Keep in mind the global scope of social media; anything you post has the potential to be viewed by anyone and, regardless of your intent, your posts may be misinterpreted by Shire, other employees, patients, investors, vendors, and/or government regulators. Use common sense, do not engage in cyber bullying and always be respectful of all individuals, races, religions, and cultures.
- Do not discuss company products.** Discussions of company products, including public statements about indications, safety or efficacy, may be subject to the same legal and regulatory requirements that pertain to company promotional activities and materials. Statements could be considered the equivalent to home-made promotional material which is strictly prohibited and may result in government enforcement, actions and penalties. Even if you personally use one of our products, because of your affiliation with Shire, your statements could be misinterpreted or misrepresented as home-made promotional material which is strictly prohibited and may result in government enforcement, actions and penalties.

Employees should not re-share or engage with content posted to Shire’s social media channels which relates to company products; an example is a press release about a product approval or launch. Disease awareness and other types of non-product content is acceptable to re-share and engage with. Employees may “share” or “re-tweet” official Shire news and information that the company has posted through our social media channels; except for product related communications.

Employees who use social media as part of their job responsibilities can contact [Communications & Public Affairs](#) for guidance on securing social media accounts, proper content creation, review, approval and publication. Processes & Guidelines for Professional Use of Social Media are currently in development.

- Do not add commentary to posts containing public financial information.** You may share or retweet information that has been made public on Shire.com or has been posted to official Shire social media channels (e.g. LinkedIn, Twitter, etc.) without added commentary and only when this information is relevant and timely. For example, only retweet or share recently posted earnings. Do not share or retweet earnings from previous quarters as they are not indicative of the current state of our business.

<sup>1</sup> <http://www.merriam-webster.com/dictionary/social%20media>

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- Report adverse events associated with Shire products.** Any employee who becomes aware of an adverse event associated with a Shire product reported through social media or any other digital channel must notify Pharmacovigilance and Risk Management (PVRM) department within 1 business day in accordance with Shire's [adverse event reporting policy](#).
- Protect the privacy of colleagues, patients, partners and the company.** Do not disclose any sensitive personal or employee data including addresses, phone numbers, email addresses, social security number, credit card numbers, health information or any other type of data protected by law or regulation anywhere in the world.

Respect patient's rights to privacy and do not access private online patient communities without permission and disclosure your affiliation.

You must obtain consent to post employee photographs. When obtaining consent, please be clear of your intention to post any photographs on social media prior to taking any photographs. An easy way to do this is say "I'm taking a photo to post online. If you don't want to be in the photo, please step out of frame." You must also obtain consent to include names, departments, or roles: Ask, 'Can I use your name, department, or role in this post?'

For more information regarding privacy requirements, please refer to [Shire's Global Privacy Policy, Document No 06-102GL](#).

- Protect Shire assets and confidential information.** Do not disclose any competitive or confidential information, trade secrets, financial information, intellectual property or other proprietary or business sensitive information of Shire. This could include information regarding your activities around confidential projects - keep this in mind when adding work to your online resume or portfolio.

Be aware that once content is posted to social media sites, it is no longer in control of you or Shire. As a rule of thumb before you post, ask yourself "If this were to become a news headline, would it do harm to Shire and/or Shire's reputation?" This guidance is also applicable to conversations, both in person and online (e.g. instant messaging), that you have with family and friends. The contents of a conversation that you may think is "private" may unexpectedly show up as a post on social media.

Make certain to only share information that is publicly available. If you are unsure if information is publicly available or is otherwise inappropriate to post, please [contact Communications and Public Affairs](#) before posting any such information.

- Respect copyrights and fair use.** Always give proper credit for another person's work and ensure that you have the right to share information before you publish. Company logos and trademarks, including Shire's, may not be used without prior consent. Refer to the [Corporate Brand](#) section on Iris if you have any questions about branding at Shire. Respect copyright laws and reference or cite sources appropriately. Shire employees should check RIGHTSPHERE© to determine permissions for a particular publication before reusing or redistributing."
- Be responsible in your use of technology.** Remember that electronic messages are permanent, transferable records of your communications and that you are personally accountable for everything you do online. Employees using Shire-issued devices should be careful and cautious when clicking on web links and downloading files from social media.
- Do not attempt to represent 'Shire'.** Do not attempt to post information that may appear that you are a representative of Shire or that readers may think to be formally sponsored by Shire. Do not attempt to create official-looking posts or channels/handles on behalf of the company; avoid the use of "we", "us" and "our" in posts.
- Be transparent about your affiliation with Shire.** It is important that you are careful to identify yourself as an employee, not to appear as a representative of Shire, and be clear that your opinions are personal and not attributable to Shire. Disclosures can appear in your social channel bio, directly within your posts, or as a disclosure statement (e.g. "I work for Shire. All opinions expressed are my own and do not necessarily represent the position of my employer.") These disclosures are equally important for any agencies, partners or vendors representing Shire.
- Always use your personal email address.** When engaging in social media in a personal capacity, always tie those accounts to your personal email. Your Shire email address is to be used for business purposes only. Professional networking sites (e.g. LinkedIn) are the only social media platforms where you may use your Shire email address.

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12. **When in doubt, contact Communications.** If you are unsure if what you want to post is suitable for social media, err on the side of not posting. If you need assistance removing or editing content, [contact Communications and Public Affairs.](#)
13. **Report Violations.** If you see content or materials posted that are inconsistent with Shire's Code of Conduct, or violate this policy, please Global Compliance and Risk Management, the Shire Helpline, or Legal.

## V. Relevant Tools

- N/A

## VI. Revision History

### A. Revision Process

The revision process will address changes to this Policy or changes to documents referenced in this Policy. Revisions to this Policy will be managed by GCRM. Upon approval, GCRM will post the revised document on its IRIS page. Material changes will be documented as follows:

Effective Date	Revisions From Last Effective Date	Authored By
01/01/2016	Updated verbiage to allow and guide the organization how to appropriately engage around Shire on social media	Jenny Frazier

## VII. Approval

**The following individuals have reviewed and approved this document and accompanying materials for distribution to the designated audience. Electronic approvals are on file and are considered equivalent to a signature on paper:**

<b>Global Compliance and Risk Management approval:</b>	<b>[Approval on file]</b> Jeffrey Rosenbaum Chief Compliance and Risk Officer	Date 12/23/2015
<b>Communications and Public Affairs approval:</b>	<b>[Approval on file]</b> Michele Galen Head of Communications and Public Affairs	Date 12/23/2015
<b>Information Technology approval:</b>	<b>[Approval on file]</b> Bob Litterer Head of Information Security and Compliance	Date 12/23/2015

## VIII. Appendix

### A. References

1. <http://www.merriam-webster.com/dictionary/social%20media>