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Global Social Media Standard

INTRODUCTION

As stated in the *Global Communications Policy*, Starbucks is committed to communicating in a manner that effectively relays timely and accurate information to its intended audiences while protecting its brands and brand reputation. This is done by providing requirements and processes to help ensure the development and distribution of timely, clear, consistent and accessible communications, regardless of audience or communications vehicle.

Every day, people around the world discuss, debate and embrace Starbucks and its brands in online social media forums. Social media is also influencing the way partners choose to engage and collaborate with one another, their customers and others.

The *Global Social Media Standard* supports the *Global Communications Policy* by helping partners determine how to participate appropriately in the dynamic, online world of social media, while protecting Starbucks reputation and proprietary information.

PURPOSE AND SCOPE

The purpose of this Standard is to set forth the requirements for all partners who choose to participate in any social media activity. This Standard applies to all Starbucks partners, globally.

DEFINITIONS

Social Media

All means of communicating or distributing information or content of any sort on the Internet including without limitation mobile and web-based applications, whether or not associated or affiliated with Starbucks

Spokesperson

A designated subject matter expert appointed by Global Communications to speak on behalf of the company in regard to a specific event, product and/or promotion, consistent with the *Global Media Relations Standard*

REQUIREMENTS

The same requirements and guidelines found in other Starbucks policies, standards, guidelines, o Mission and Values also apply to partners' activities in social media. Ultimately, partners are solely responsible for what they communicate in social media. Before creating and distributing information or content, partners should always consider the risks, as well as rewards, involved.

Any conduct that adversely affects a partner's job performance or the performance of other partners, or otherwise adversely affects customers, suppliers, vendors, people who work on behalf of Starbucks, or Starbucks legitimate business interests, may be subject to corrective action, up to and including separation from employment.

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General Requirements

- Partners must not use Starbucks logos, trademarks or visual identity to communicate on behalf of the company with customers in social media without Global Marketing permission.
- Partners must always be fair and courteous to fellow partners, customers, vendors, suppliers or others who work on behalf of Starbucks.
 - Partners should keep in mind that they are more likely to resolve work-related complaints by speaking directly with their co-workers, manager, Partner Resources, or by contacting the Business Ethics & Compliance helpline, than by distributing complaints using social media.
 - If a partner decides to distribute complaints or criticism, he or she should avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating; that disparage partners, customers, vendors, or suppliers; or that might constitute harassment or bullying.
 - Inappropriate content includes discriminatory remarks, harassment or threats of violence or similar inappropriate or unlawful conduct. Further examples include offensive content meant to intentionally harm someone’s reputation or that could contribute to a hostile work environment on the basis of race, sex, sexual orientation, disability, religion or any other status protected by law or company policy.
- Partners must make sure they are always honest and accurate when distributing information or news about Starbucks products and services.
 - Partners must never distribute information or rumors they know to be false about Starbucks, partners, customers, suppliers, vendors, or other people working on behalf of Starbucks.
 - Partners must quickly correct any mistakes they make and be open about any previous posts they have altered.
 - Partners must not make false or misleading claims about Starbucks products and services.
- Partners should remember that almost everything distributed on the Internet is archived. Therefore, even deleted or altered information may be searched.
- Partners must not distribute internal reports, policies, procedures or other internal business-related, confidential communications.
 - Partners must maintain the confidentiality of Starbucks trade secrets or private and confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology.
- Partners must express only their personal opinions and never represent themselves as a spokesperson for Starbucks in social media.
 - If Starbucks products and services are a subject of the content partners are discussing or distributing in social media, they must be clear and open about the fact that they are partners and that their views do not represent those of Starbucks, fellow partners, customers, vendors, suppliers or people working on behalf of Starbucks.
 - It is best to include a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of Starbucks.”
- Partners must respect financial disclosure laws.
 - It is illegal to communicate or give a “tip” on inside information to others so that they may buy or sell stocks or securities. Such online conduct violates Starbucks *Insider Trading Policy*.

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Using Social Media at Work

- Partners must refrain from using social media in any manner that interferes with their job responsibilities.
- Consistent with the *Acceptable Use Standard*, Starbucks electronic communications systems, including the internet, are intended for business use only. Starbucks recognizes the occasional need for personal use of certain resources, therefore some personal usage is permitted at the discretion of management.
- Partners must not use Starbucks email addresses to register social media accounts intended for personal use.

Media Contacts

- Partners should not speak to the media on behalf of Starbucks without contacting the Public Affairs department.
- All media inquiries must be referred to Media Relations, consistent with the *Global Media Relations Standard*.

Retaliation Is Prohibited

- Starbucks prohibits taking negative action against any partner for reporting a possible deviation from this Standard or for cooperating in an investigation.
- Any partner who retaliates against another partner for reporting a possible deviation from this Standard or for cooperating in an investigation will be subject to corrective action, up to and including separation from employment.

ASSOCIATED GOVERNANCE TOOLS

Policies

- Disclosure Policy
- Global Business Ethics Policy
- Global Communications Policy
- Global Information Security and Management Policy
- Insider Trading Policy

Standards

- Acceptable Use Standard
- Anti-Harassment Standard
- Anti-Retaliation Standard
- Cellular Use Standard – U.S. and Canada
- Global Media Relations Standard
- Remote Access Standard – U.S. and Canada
- Standards of Business Conduct

Guidelines

- Global Social Media Guidelines for Partners
- Travel and Reimbursements Mobile Device and Social Media Usage Guidelines – Global

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REVISION HISTORY

| Document Version | Date | Description of Revisions |
|------------------|------------|--|
| 1.0 | 04/2010 | First Draft |
| 2.0 | 05/10/2010 | Transferred to official template and edited by SPO |
| 3.0 | 02/28/2012 | Transferred to new template by SPO |
| 4.0 | 03/06/2012 | Edited by Regan Zeebuyth, partner communications |
| 4.1 | 03/20/2012 | Edited by Regan Zeebuyth, including edits received from: Anna Kakos, Connie Lange, Neil Moir and Barbara Moretti |
| 5.0 | 05/30/2012 | SPO: Took content from Requirements worksheet and put into template; edited for content and format; split out guidelines into separate document |
| 6.0 | 06/06/2012 | SPO: Rewritten based on NLRB's GC memo/Wal-Mart's policy |
| 6.1 | 06/12/2012 | PA: Regan Zeebuyth edits to version 6.0. |
| 6.2 | 06/14/2012 | PA: Regan Zeebuyth incorporated final proposed edits from cross-functional stakeholders and Legal counsel prior to submission to Policy Owner for approval to deliver to PGC |
| 6.3 | 06/15/2012 | PA: Regan Zeebuyth incorporated a few additional edits received from Anna Kakos, Barbara Moretti and Kim Kemper on 6/15/12. |
| 6.4 | 07/11/2012 | Approved by PGC pending edits |
| 6.5 | 07/13/2012 | Edits made by Regan Zeebuyth after consultation with Anna Kakos, Kim Kemper, and Melissa Novick |
| 6.6 | 07/31/2012 | Edits made by Regan Zeebuyth based on comments from Dave Estlick |
| 7.0 | 08/08/2012 | Final version approved by PGC via email vote |
| 8.0 | 09/14/2012 | Edited by Regan Zeebuyth to include Canada partners. |
| 9.0 | 05/03/2013 | Edited by Regan Zeebuyth to include LATAM and EMEA partners. |
| 9.1 | 05/20/2013 | Reviewed by SPO prior to submission to PGC |
| 10.0 | 04/22/2014 | Edits made by Regan Zeebuyth following CAP market legal reviews. |