

**Stable Value Investment Association
Online Social Media
Policy
Adopted June 4, 2013**

PURPOSE

The principal objective of Stable Value Investment Association (“SVIA”) for SVIA website and SVIA’s own use of social media is to provide and promote an understanding of stable value and the role stable value can play towards achieving financial security for and in retirement.

The SVIA website, currently found at stablevalue.org, will serve as the foundation to the overall SVIA communications strategy. The purpose of the communication strategy is to amplify SVIA messages, establish SVIA as the source for industry thought leadership, and promote the sharing of positive ideas and information related to stable value.

The SVIA website and SVIA’s utilization of social media will therefore be directed toward promotion of SVIA information, activities, and initiatives on stable value to SVIA’s membership, the public, policymakers, plan sponsors and consultants.

The policy and guidelines that follow serve to clarify what information, activities, and initiatives SVIA will allow to be made available on the SVIA website, to whom and why, and how social media will be used by SVIA to distribute information to key audiences.

These efforts will maintain SVIA’s integrity and reputation, as well as that of member firms, while minimizing and negating potential legal risks.

WEBSITE

Posting of SVIA Content:

Information, activities and initiatives to be posted by or on behalf of SVIA on the SVIA website, currently found at stablevalue.org, must be pre-approved by the relevant SVIA committee, subcommittee, and/or Board of Directors. Approval is at the sole discretion of SVIA. But, in most cases, this approval will take the form of formal adoption by the relevant SVIA body. In time sensitive situations, approval may also be granted by the SVIA Executive Committee.

Posting of Non-SVIA Content in the Public Area of SVIA’s Website:

SVIA’s policy for posting non-SVIA materials in public areas of the website requires that any and all such information must be overall supportive of the stable value asset class and/or consistent with SVIA positions and messages. It must also be beneficial to SVIA and its constituencies in terms of educating members, plan sponsors, consultants, policymakers and the general public. If the information is copyrighted or requires permission from the source or news entity/organization, copyrights will be respected and obtained with the necessary consent, license, or permission in a reasonably documented way. This information may come from a variety of sources and is not intended to be all inclusive. Information not meeting this criteria will be removed by SVIA.

Further, information that may be promotional in nature may also be considered for publication or display. Such promotional information, however, must be supportive of the asset class and/or SVIA positions to be posted in the public area of the SVIA website and is subject to the prior review and approval by the Media Team, Committee on Communication and Education and/or the Committee Chairman for a determination of whether or not such publication or display of promotional information will be allowed. Again, SVIA has absolute discretion with respect to the posting or display of any content on its SVIA website or by or on SVIA's behalf.

Posting of Private Content:

The purpose of the *Member Briefings* category in the News section of the SVIA website found at stablevalue.org is to brief SVIA members on articles, information, and issues related to or regarding stable value and SVIA. This information comes from a variety of sources and is not intended to be all inclusive. Information in *Member Briefings* may be supportive or critical of the stable value asset class. SVIA does not and will not endorse or support the information in *Member Briefings* that is not the SVIA's. Further, SVIA makes and will make no testament as to the accuracy of the information or the claims made in the materials that are contained in *Member Briefings*.

Marketing and other self or firm promotional pieces will be avoided and not permitted for use, publication, or display, unless making SVIA members aware of this information in *Member Briefings* outweighs the promotional elements of the information. This determination will be made by the chairman of the Committee on Communications and Education and/or the chairman of the Board of Directors. If they determine the need for further consideration, the Media Team will be consulted regarding the information.

All items in *Member Briefings* will contain the following disclaimer:

Disclaimer to Add to Member Briefings:

The purpose of the *Member Briefings* category in the News section of stablevalue.org is to brief SVIA members on articles and issues related to or regarding stable value. This information comes from a variety of sources other than SVIA and is not intended to be any form of professional advice or counsel or necessarily all inclusive. Information in *Member Briefings* may be supportive or critical of the stable value asset class. SVIA does not endorse or support the information in *Member Briefings* that is not SVIA's. Further, SVIA makes no testament as to the accuracy of the information or the claims made in the materials that are contained in *Member Briefings*.

Recognition of Copyrights on Website:

To respect and uphold copyrights, stories from news sites may not be published in their entirety without express written permission of the copyright holder. Moreover, and for any linked material, SVIA will attempt to provide:

- The date, title, author, and publication of the article; and
- A direct link (without intervening pages or frames) to the full article or a PDF file if permitted, or information as to how to obtain the article.

SOCIAL MEDIA

SVIA initiatives, information, and activities will be highlighted using social media networks or platforms, such as LinkedIn and Twitter, and only as directed by SVIA as additional media channels to reach key constituencies. Messages directed for use, display, or publication by SVIA in these media channels may be pulled and used consistently in both intent and substance from the materials hosted on the SVIA website found at stablevalue.org

While social media offers instant access and constant communication, SVIA's use of social media may be less frequent and not constant in comparison. At least upon initiation of these new media channels, SVIA will strive for at least one posting per week. However frequency of postings may be more or less since the number of postings will be determined by and limited to available SVIA-stable value content.

LinkedIn Discussion/Tweet Guidelines for Members, Guests and SVIA Staff. Interactions through the various social media platforms should adhere to the following principles:

- **Be nice** – As a member, guest or staff of SVIA, professional conduct must be adhered to at all times. Politeness and respectfulness are required in every posting made by or on behalf of SVIA, regardless of what has been said by others.
- **Be timely** – While it is not necessary to participate in every discussion or respond to every inquiry, those which are chosen by SVIA for its involvement should be addressed as promptly as necessary to address engagement and maximize effectiveness.
- **Address trends** – SVIA will acknowledge with this policy statement that it will not always be possible to respond to everyone through its social media interactions or communications. Instead, SVIA will strive to address major trends by referring to information on the SVIA website found at stablevalue.org. Should a trend open a new area or subject that SVIA needs to address, the SVIA Media Team will evaluate this trend and if appropriate develop a response. Social media will be monitored for emerging trends to facilitate the Media Team's work and when necessary, respond. Any such response or involvement shall be at SVIA's sole discretion.
- **Stay on topic** – While the occasional deviation from stable value or finance humanizes SVIA messaging, the majority of communications should be relevant to SVIA goals and mission as set forth in this policy statement. Moreover, all discussions on stable value should stay at a broad, high level. Individual member firms and their products should not be discussed or mentioned.
- **Stay positive** – SVIA will not be required to point out a factual inaccuracy in every communication, content piece, or conversation brought to its attention or of which it becomes aware. Moreover, SVIA will not engage in or provide negative commentary or argument.

Monitoring/Review Process:

SVIA will endeavor to monitor its designated social media network or platforms (of interest) utilizing available tools, such as HootSuite, and will try to do so on a daily basis. These monitoring efforts will be in furtherance of generating reports for the SVIA Media Team and Board as well as to track SVIA content and discussions and monitor the effectiveness of SVIA communications and interactions. SVIA Staff will highlight trends, potential controversies or unforeseen circumstances to the SVIA Media Team and Board

as soon as possible. Such reports initially, will be weekly and may be adjusted by SVIA in its sole discretion once SVIA becomes more familiar with these online information channels.

Deletion/Removal:

Material posted in a forum hosted or moderated by SVIA is and will be subject to deletion if it contains any of the following:

- Inappropriate language or references;
- Spam advertisements;
- Personal attacks;
- Specific and negative references to a member company or their products;
- Private information;
- Copyrighted content (provided without supportable evidence of express permission or license);
- Unlawful content; and
- Off-topic information.

Maintain Records:

SVIA's policies that govern proper records management (i.e., creation, maintenance/use and disposition) will apply to any records created or managed when using social media. In particular, new content created with social media tools must be captured and maintained in a recordkeeping system according to SVIA Documents and Retention Policy.

Third Party Content:

Occasionally SVIA may receive requests to publicly post content from a third party, such as a member firm or related organization. SVIA will strive to honor these requests, but all content must meet the public posting guidelines and will remain at all times subject to the discretion and prior approval of SVIA. No third party content will be posted, published, or displayed by or on behalf of SVIA without its prior consent.

Time Sensitive Response Requirements:

In the case of a negative major event or controversy, SVIA will endeavor to abide by the time sensitive response procedures detailed below in order to respond in an expedited and timely fashion.

During periods of controversy or unforeseen circumstances an official immediate SVIA response may be necessary in as timely a manner as is possible (e.g., within 24 hours). In the case of such an event, the SVIA will request the immediate assistance of the SVIA Media Team and/or the Executive Committee who are available for consultation with little or no notice in order to respond to an immediate concern. Members from the SVIA Media Team and/or Executive Committee will work in an expedited manner to develop a SVIA response to the controversy or unforeseen circumstance. This expedited process will be used to post on the SVIA website found at stablevalue.org and/or used in on the SVIA social media networks or platforms (with which SVIA participates) to respond to issues that are an immediate concern.

Additionally, some issues by their nature may be inappropriate for public discussion. Should such an issue arise, SVIA will request the contact information of the person(s) involved, and move the discussion offline and attempt to resolve the issue offline.

SVIA Member Interaction:

SVIA may request assistance from members in promoting and discussing stable value in social media. SVIA will endeavor to respect and adhere to member firms' policies on such interactions. Members and their firms who are working with SVIA in these efforts will also abide by SVIA policy and guidelines for social media in accordance with this policy statement.

SVIA Staff:

SVIA employees involved in social media participation through such platforms or networks as LinkedIn and Twitter must remain aware of their role and otherwise act as an appropriate representative of SVIA. Any content used on social media network, such as LinkedIn and Twitter, must therefore be hosted on the SVIA website and therefore preapproved. Accordingly, SVIA employees will work to refer Twitter and LinkedIn users to the SVIA website in order to establish and maintain the SVIA website found at stablevalue.org as SVIA's communication forum of choice and generally as the source of thought leadership for industry-related discussions relevant to SVIA. Staff must adhere to SVIA engagement guidelines at all times.

Official Spokespeople for SVIA:

Should an official spokesperson be needed on behalf of SVIA, the president and chairman of the SVIA Board of Directors, consistent with SVIA bylaws, shall be the only person authorized to serve in this capacity.