



SanDisk Social Media Policy

Policy Owner: Corporate Communications

Policy Type: Worldwide

Applies To: All SanDisk Employees & Contractors

FINAL, May 14, 2010

INTRODUCTION

Social media represents a significant opportunity for SanDisk to engage directly with its customers and the public in a one-on-one or one-to-many fashion. However, as with any mode of communication, there are limits on what we can or should say and do. This Social Media Policy (“Policy”) provides guidance for participation on online social networking sites, interactive forums, blogs, wikis, chat rooms, podcasts, video posts and the like on behalf of SanDisk. In addition, this Policy addresses personal use of social media to the extent such use may impact SanDisk.

I. Utilization of Social Media on Behalf of SanDisk

Within the marketing mix, social media is distinguished by its:

- Direct access to consumers
- Audience usability
- Sense of community
- Speed and reach – it’s nearly instantaneous
- Cyclical nature (of the online environment)

Participation in social media is an excellent way for SanDisk to contribute to the broader community of consumers and innovators. If done carelessly, however, SanDisk or an individual user could suffer loss of reputation, loss of or inability to obtain Intellectual Property (IP) rights such as patent and trademark rights, loss of export privileges, securities law violations, or other negative consequences. This Policy exists in conjunction with and is subject to SanDisk’s Worldwide Code of Business Conduct & Ethics, as well as all other SanDisk policies and procedures.

Authorized Spokespeople

Corporate Communications will maintain a list of SanDisk employees, contractors and other representatives who are authorized to engage in social media marketing on behalf of SanDisk. Any requests for authorization or questions about who is authorized should be directed to Corporate Communications.

Executive Participation

Given the sensitivity and potential liability associated with comments from executives, it is generally recommended that Company executives not participate in social networking sites on behalf of SanDisk.

It is possible that participation may make sense in certain circumstances, but such participation should be approved in advance by Legal and Corporate Communications. If so approved, the executive should follow all rules and best practices outlined in this policy.

Basic Rules For Online Spokespeople

- You are responsible for what you post.
- If you're an employee, contract worker, or other representative of any kind affiliated with SanDisk and authorized to engage in social media marketing on behalf of SanDisk, then the following protocols and best practices and parameters apply to you.
- Further, keep in mind that you're speaking at all times as a SanDisk spokesperson representing the interests of the Company and you should ensure that your affiliation with SanDisk is clear and transparent. Before communicating on behalf of SanDisk, be sure to disclose your name and affiliation. Do not use aliases, misrepresent your relationship with SanDisk, or otherwise attempt to mislead the audience.

1) PROTOCOLS

The following rules must be followed in order to participate in social media.

Corporate Policies, Review and Oversight

Not everyone at SanDisk is an authorized spokesperson. Remember that your participation is subject to prior approval as noted above. Once approved as a spokesperson, there are two primary forms of social media in which you may engage – campaigns and conversations – which differ with regard to corporate review:

Campaigns – Social media marketing campaigns are subject to corporate and legal review similar to any Company communication. This process includes review by your direct manager and SanDisk's Corporate Communications and Legal teams.

Conversations – Ongoing conversations and dialogue by approved spokespeople are not subject to prior review. However, these conversations should adhere to the accompanying "Social Media Best Practices Training" deck which is currently in draft form (expected completion in May 2010).

- **Transparency of Origin and Accuracy:** All authorized spokespersons must ensure that their affiliation with SanDisk is transparent. Anonymous postings are not permitted. Endorsers (and other third parties authorized to engage in social media on SanDisk's behalf) must disclose their relationship with SanDisk if they are in any way contracted, compensated or seeded by SanDisk.

- Traditional Advertising Laws Apply to All Media, including Social Media. Information should be truthful and not potentially misleading. Claims about the Company and its products and services must be substantiated by current, relevant and reliable data on record at the time the claim was made. As with any other advertising, claims should be consistent with approved message maps. Use proper trademark attribution for SanDisk and third party marks.

Non-Public, Confidential and, Privileged or Proprietary Information

Transparency is a hallmark of engaging in social media, yet it's not okay to disclose or share non-public, sensitive or confidential information about SanDisk. This includes, but is not limited to, new/future products, product availability/ship dates or commercial availability/pricing, financials – either actual or projected, company plans, news, internal memos or other private content, privileged communications with attorneys, any information about litigation or other legal matters and proprietary data. You cannot engage in dialogue about new products that have yet to be formally announced. Further, we refrain from commenting on rumor or speculation about any aspect of SanDisk's business in the U.S. or globally, and we also refrain from commenting on rumor or speculation about our competitors or others in the industry. Please note that this applies to SanDisk information from its business affiliates including but not limited to retailers, distributors, subsidiary companies, partners, customers and manufacturing partnerships.

Third Party Rights, Fair Use and Data Privacy Principles

Give credit where due for work, references and any other resources utilized. Don't cite or reference partners without their prior approval. Any form of plagiarism is not an acceptable practice and may have legal consequences for you and/or SanDisk.

Don't reveal personally identifiable information about others unless (1) you've cleared it with Corporate Communications; (2) you've been given prior written permission by the individual(s); and (3) you're revealing such information only to the extent permitted and required for transparency. Personally identifiable information includes name(s), contact information, and position, as well as descriptions sufficient to allow someone to be personally identified.

All uses of third party intellectual property (including without limitation, content such as music, video and album art, trademarks, product images and names and likenesses of individuals) must be properly authorized. Please review our Global Privacy Policy and contact the Legal department early in the process.

Accurate Record Keeping

Maintain accurate records of all online interactions and regularly monitor ongoing conversations. Online company statements can be held to the same legal standards as other official media communications, so be sure to keep track of all external dialogue and be sure to send an email copy to Corporate Communications at SanDisk.PR@sandisk.com.

Think Globally

A post that is perfectly acceptable in one region or location may be inaccurate or negatively perceived in other parts of the world. Keep a global perspective when participating in online conversations.

When in doubt, wait

Remember that content published online becomes a part of the permanent record. Think carefully before posting and avoid making hasty or off-the-cuff remarks. When in doubt, don't post. You can always respond later, but you can't take back previous comments.

Inappropriate and/or Offensive Content

It goes without saying that the use of obscenities, insults, or other offensive references or content is inappropriate and is strictly forbidden. In addition, avoid disparaging remarks, personal attacks or other similar remarks that could lead to exchanges considered objectionable or inflammatory, such as politics or religion.

2) BEST PRACTICES

Do Your Research Prior to Engaging

Ask (and answer) these questions when formulating any new social media campaign:

- What are our objectives?
- Who is our target audience?
- What do we expect to accomplish? (Sell products? Brand awareness? Product feedback?)
- Can we commit the resources necessary for the long term: manpower, regular stream of content, etc?
- How frequently will we communicate via these platforms?
- Is this a campaign with a finite time period or is it an ongoing effort that will be sustained over months or years?
- Does the look and feel of our campaign relate to our audience? Does it speak to SanDisk's brand pillars – trusted leader, innovation and empowerment?

Make a Commitment

When you embark on a program, you should ensure you have the time and resources to stay in it for the long run. Social marketing means being part of a community, and engaging on a consistent basis is paramount to be a good citizen. Be present with frequent updates (daily or weekly, not every month or quarter), comments, new images and videos, etc. -- don't "go dark." For example, two or three informational posts per week are a good frequency to maintain follower interest, but a higher volume may be needed if company/consumer conversations develop.

Commit to your audience and monitor ongoing chatter. Be responsive to questions, comments, feedback and relevant dialogue.

Be Transparent and Authentic

If participating in forum conversations, responding to blog comments, or taking part in other online dialogues, you must always introduce yourself and disclose the company for which you work. According to the United States Federal Trade Commission (FTC) guidance published on October 5, 2009, any “word of mouth” marketing posts or “cash” or “in kind” payments to bloggers must contain easily understood disclosure of the material connection to the seller of the product or service. Likewise, any Company-sponsored research results or advertisements must disclose the connection between the Company and the research or advertisement organization.

Clearly identifying yourself as a SanDisk employee or affiliate will not only identify you as an advocate for SanDisk but will also personify the Company and help build rapport. “Blind posting” (that is, promoting SanDisk products without identifying yourself as being affiliated with or working for SanDisk) is considered a big negative in this environment and will be considered deceptive use of testimonials and endorsements by the FTC. Many people have thought they could get away with not identifying themselves or their company’s agenda, only to be found out and exposed in a very public fashion. It’s not worth the risk and it *will* be discovered. Doing so also violates SanDisk’s Code of Business Conduct & Ethics, and laws against fraudulent, deceptive and unfair trade practices which may subject you and/or SanDisk to legal exposure not to mention negative publicity and damage to the SanDisk brand.

Exercise Good Judgment

At its core, social media is about sharing information, opinions and content. Consider that you’re talking to numerous audiences, most notably:

- 1) Work-related: peers, co-workers and current/future, external business partners.
- 2) Consumers: Potential customers who have varied interests and opinions about what’s tasteful.
- 3) Media, bloggers and others: People who may utilize content for news purposes.

Use your best judgment to determine if content is appropriate (or not), including the tone, voice and how audiences may relate. Remember that when engaging on behalf of SanDisk, you’re representing the Company and its brand and not your personal interests or opinions.

For example, you should not contribute to product reviews on sites like Amazon.com or SanDisk.com for SanDisk products without identifying yourself as a SanDisk employee. As such, be prepared to take responsibility for what you say and do on behalf of the Company. And when unsure if a comment or content is suitable to publish, take pause and give the topic further thought. Better yet, check in with a co-worker for a second opinion. If in doubt, simply refrain. In general, you should adopt a professional tone and avoid overly-enthusiastic posts. It’s best to stick to the facts.

Add Value to the Conversation

Regard social media channels as more than just a series of platforms from which to evangelize SanDisk's products. Overt marketing can be a turn-off to these audiences. Take the opportunity to share your expertise with dialogue on relevant topics. Feel free to jump in and provide someone shopping with a URL or product review with the exception of answering product questions – that's the domain of customer support (see below).

Be Prepared

Expect the unexpected and be prepared. Often times a social dialogue can turn into a debate, or worse yet, an argument. If this happens, refrain from engaging in online sparring just to win/prove a point. It's acceptable to politely correct wrong facts or information, but refrain from telling someone their opinion is wrong.

Take care in acknowledging mistakes or characterizing something as a mistake. If you misspoke factually in a post (say, misquoted a price) it's fine to correct yourself (and you should do so promptly). However, you should avoid discussing any performance issues or acknowledging any performance shortfalls by the Company or a SanDisk product. Doing so opens SanDisk up to legal exposure. If in doubt, please contact Corporate Communications before responding.

Customer Support

Though it may be tempting to answer customer support questions on forums, Facebook, and Twitter among others, you should always route direct these questions to existing customer support channels. To do otherwise may conflict with existing channels or contradict Company policy on items such as warranty, product replacement or other sensitive topics. Thus, please refer customer support questions to support@sandisk.com. Customer Support is already leveraging Twitter to respond to customer support issues. If in doubt, please contact Corporate Communications for guidance.

Training

We have also prepared a SanDisk Social Media Best Practices Training deck that you should review prior to participating on these platforms as a representative of SanDisk. Please contact Corporate Communications to get trained.

II. Personal Use of Social Media

The following principles provide guidance when engaging in **personal or unofficial** online activities.

Abide by SanDisk Policies

To the extent personal online activities may reflect upon or otherwise impact SanDisk's business, all employees and other SanDisk personnel must adhere to the SanDisk Worldwide Code of Business Conduct & Ethics, as well as all other policies including but not limited to, policies concerning harassment, intellectual property, and protection of confidential information. **NEVER** disclose or share non-public, sensitive or confidential information about SanDisk. Also, be aware of conflicts that may arise from taking public positions online that are contrary to the Company's interests.

Personal Accountability

You will be held accountable if your activities harm SanDisk's image or reputation. We encourage your involvement in the online community, but urge that you do so with common sense and awareness that your actions have consequences.

Raise Internal Awareness

You can help SanDisk stay aware of how it is perceived in the social media space. If you encounter positive, negative or inaccurate remarks about the Company online and you believe that they deserve attention, consider sharing them with Corporate Communications. This will help us know what we are doing well as a Company and where we can aim for improvement.

Don't respond to Negative Posts

If you encounter negative, disparaging or outright offensive remarks directed at SanDisk, **do not respond** unless you are an authorized online spokesperson. Instead, forward the comments to Corporate Communications.

Be Aware of the Broader Audience

SanDisk respects freedom of expression. However, comments and content addressed to friends and family can reach a broader audience than originally intended, including customers, co-workers and other business associates. Remember this before publishing any materials online and reflect upon the appropriateness of such content and the possible repercussions it might have.

No Expectation of Privacy in Company Systems

As communicated in SanDisk's Computer Resources and Telecommunications Policy, the Company does not preclude personal use of Company-owned electronic resources, provided personal use is reasonable and does not interfere with SanDisk's business. However, keep in mind that if you choose to use Company systems when engaging in personal online activities involving social media or otherwise, such activities are not private and the Company may access, review, monitor, record or otherwise manage these activities or the content therein at any time.

III. Policy Compliance

For specific questions or additional guidance on the use of social media, please contact Corporate Communications at SanDisk.PR@sandisk.com.

Failure to abide by this Policy may result in disciplinary action, up to and including termination of employment, or in the case of non-employee personnel, termination of the business relationship.