

Social Media Policy

Policy Statement

ABX Air, Inc. (“ABX Air”) acknowledges the significant influence of the Internet in shaping public perception of ABX AIR and affiliates (collectively, the “Company”). Online platforms play a critical role in how our employees, partners, customers, and competitors engage with and understand the Company. ABX AIR further recognizes the value of employee participation in online discourse, including through social media, as a means of contributing to industry dialogue and direction. Such engagement may also provide personal fulfillment and professional development opportunities for employees. This **Social Media Policy** outlines the Company’s expectations regarding online conduct and applies to all Company employees, regardless of role or location.

Scope and Expectations

ABX AIR supports informed, respectful engagement in online activities and social media interaction. At the same time, the Company expects all employees to uphold the highest standards of personal and professional conduct in these forums. Employees must avoid conduct that could create even the appearance of impropriety or generate negative perceptions of the Company, its businesses, employees, partners, customers, or competitors.

This policy applies to all online platforms and communications that could reasonably be perceived as impacting the work of ABX AIR employees or the reputation of the Company. For clarity, this policy governs all online activity and social media interaction, regardless of whether such activity occurs outside of

working hours or on personal devices or accounts.

Monitoring; Discipline

Generally, ABX AIR does not proactively monitor employees’ personal online activities or social media accounts. However, ATSG Security, the Marketing Department, supervisors, managers, other Company personnel, or external partners may, from time to time, review publicly available content to gain insight into employee perspectives or, when appropriate – such as upon notification of a potential policy violation – to assess compliance with this policy. If the Company becomes aware of a potential violation, it will initiate an investigation and take appropriate corrective action. Such action may include a request to edit or remove specific content and may result in disciplinary measures, up to and including termination of employment.

Permissible Online Activities and Social Media Interaction

When engaging in online activities or interacting on social media in a manner that may reference or relate to the Company – including its current, past, or prospective businesses, employees, partners, customers, or competitors – **employees must adhere to the following guidelines:**

- 1) **Personal Views:** Clearly state that any views expressed are personal and do not represent those of the Company.
- 2) **Authorization:** Employees are not authorized to speak on behalf of the Company or imply such representation without prior approval from the ATSG Director of Marketing.
- 3) **Disclosure:** Notify the ATSG Director of Marketing and the applicable supervisor or manager of any social media accounts or online activities that relate to the Company, even in general terms.

- 4) **Professional Conduct:** Ensure that all online engagement is conducted with accuracy, respect, professionalism, and sound judgment.
- 5) **Privacy and Confidentiality:** Respect the privacy rights of fellow employees by obtaining their consent before sharing or discussing internal Company matters that could be considered private or confidential.
- 6) **Monetization and Conflicts of Interest:** Obtain written approval in advance for any monetized online activities that may present a conflict of interest. This includes, but is not limited to, paid advertisements, social media promotions, training materials, books, products, and freelance writing. At a minimum, approval must be obtained from the applicable Human Resources Department, with notification provided to the ATSG Director of Marketing. Employees may not sell products or services that compete with those of the Company or use the Company's intellectual property for personal gain.
- 7) **Uncertainty and Risk:** When uncertain about whether content may reflect upon the Company or its stakeholders, employees must consult the ATSG Director of Marketing prior to publication.

The Company will always consider the extent that any otherwise prohibited activity would constitute protected concerted activity, under applicable law.

Prohibited Conduct and Online Activities

The following conduct is prohibited or limited as described below. This applies both to single online activities and to series of related online activities and social media interactions (such as separate posts from the same account).

- 1) Employees are prohibited from any

online activities or social media interaction that may even appear to be providing or in any way condoning support to terrorists, to be associated with other criminal acts, or to otherwise promote, glorify, or express support for terrorism, extremist organizations, or violence (including, but not limited to, statements or imagery related to US government-designated terrorist organizations).

- 2) Unless given permission by the Chief Legal Officer and Vice President, Information Technology, and pursuant to applicable procedures, employees are prohibited from using or permitting or causing to be used any Company devices, Company networks, or bypass/workaround technology (such as VPN tunneling or TOR browsing), to download, use, or access online sites, tools, and services (including mobile apps) that are not permitted under the IT department's standard procedures and the Company's technology use policy.
- 3) As a federal contractor, the Company is subject to specific regulatory requirements governing the use of technology and digital platforms. In accordance with federal guidance and cybersecurity directives, Company employees who directly support U.S. Government customers or contracts ("Covered Employees") are prohibited from using TikTok or any application developed by ByteDance Ltd. on Company-issued devices, including mobile phones, laptops, and tablets.

This restriction applies regardless of whether the use is personal or professional. Covered Employees must not download, access, or engage with TikTok or other ByteDance applications on any Company-provided device.

- 4) From time to time, federal, state, or local governments may ban, prohibit, or limit access to certain other online sites, tools, and services (including mobile apps). Such decisions may explicitly apply only to government employees or may also be a procurement condition for certain government contracts. Whether or not such

a government decision specifically applies to the Company, the Company may from time to time broadly prohibit downloading, using, or accessing such online sites, tools, and services (including mobile apps), including for cybersecurity reasons. It is the obligation of all our employees to be aware of and comply with such prohibitions.

- 5) Under no circumstances may personally identifiable information be disclosed without written permission (email acceptable) of any employee, customer, vendor, or party who is in any way affiliated with the Company.
- 6) Employees must refrain from engaging in name-calling, personal attacks, or any behavior that could reflect negatively on the reputation of the Company. All online interactions, whether professional or personal, should be conducted with respect, professionalism, and adherence to the Company's standards of conduct.
- 7) Company logos and trademarks may not be used without explicit advance permission in writing from the ATSG Marketing Department (email acceptable). This is to prevent the appearance that any unauthorized personnel speak for or represent the Company officially and to protect the intellectual property rights of the Company.
- 8) Employees are strictly prohibited from engaging in any online activity that involves or promotes any of the following: copyright or trademark infringement; fraud; defamation; plagiarism; discrimination; harassment; derogatory or offensive statements based on race, gender, religion, or other protected characteristics; threats or intimidation; sexually explicit content (including nudity or partial nudity); forgery; impersonation; unlawful gambling; or any other conduct that violates Company policies. Additionally,

any online behavior that may harm the Company's reputation, erode stakeholder trust, create a hostile or unsafe work environment, or conflict with the Company's core values or obligations as a government contractor is prohibited, regardless of whether such conduct is directed at the Company.

- 9) Do not share information that is confidential or proprietary about the Company. This may include but is not limited to information about trade secrets, planned trademarks or other in-development intellectual property, upcoming or ongoing services, sales, finances, number of contracts, number of employees, Company strategy, and any other information that has not been publicly released by ABX AIR outside of employee-only communications.

Legal Liability

Employees should be aware that individuals may be held legally accountable for any content they publish or share online. Commentary, images, or other content that violates Company policy or applicable law may result in disciplinary action, including termination of employment. This includes content that may be considered defamatory, harassing, threatening, libelous, pornographic, proprietary, or that contributes to a hostile work environment.

Such liability may arise not only within the workplace or on Company-issued devices, but also from personal online activity conducted outside of work. Employees may be subject to legal claims from colleagues, competitors, or other third parties who perceive such content as unlawful or harmful.

The Company is not obligated to defend or indemnify employees whose online conduct violates applicable law or Company policy.