

## **Action Guidelines for the Use of Social Media**

### **[Introduction: Background and Outline of the Introduction of These Action Guidelines]**

Amid the spread of the Internet and cell phones which enables each and every consumer to directly communicate information to society, various corporate activities, including the brand and services that we, Liber Hotel at Universal Studios Japan (hereinafter, the "Hotel"), provide, are now being discussed and talked about on blogs, online forums, SNS, Twitter, and other Internet-based platforms across borders.

Under such circumstances, all parties taking part in the Hotel are required to recognize that each and every one of us has a role to play as an ambassador to properly convey the value and attractiveness of the brand that the Hotel can be proud of and to fully understand how influential the conversations taking place on the Internet about the Hotel can be. It is also important to participate in those discussions in an appropriate manner, taking into consideration the impact on our brand and business.

These Guidelines were created as a prescriptive guide for all those taking part in the Hotel (hereinafter, "Staff Members") to deepen their understanding of social media, which is increasingly becoming an important new platform for corporate marketing and communication activities, and furthermore, as a guideline for actively spreading the brand value of the Hotel and its positive impact through the use of social media.

### **■ Basic Guidelines for the Use of Social Media as an Individual Privately**

Regardless of the organization you belong to or the form of your employment, Staff Members are required to comply with [Use of Social Media by Personnel and Partner Companies] upon understanding [Basic Principles of These Action Guidelines] and [Commitments of Liber Hotel at Universal Studios Japan Regarding Social Media] included in these Action Guidelines.

Not only must you comply with the code of business operations of the Hotel, the rules of employment for personnel of the Hotel and those of its partner companies who engage in the operations of the Hotel, and other applicable laws, regulations, and policies, but you must also understand the Hotel's five core values in social media activities and comply with the four items required when participating in social media activities as a prerequisite, even when participating in social media activities privately as an individual.

### **■ Basic Policy for Speaking about the Brand and the Company on Social Media on Behalf of Liber Hotel at Universal Studios Japan**

In order to be allowed to speak about the Hotel's corporate activities and brand through social media on behalf of the Hotel, it is a prerequisite to be authorized through the Hotel's authorized training program, regardless of the organization you belong to or the form of your employment.

Only statements about the Hotel's corporate activities and brand made on various social media platforms that are made within the Hotel's authorized accounts and by Staff Members who have attended the authorized training program and have been authorized by the Hotel will be accepted as the Hotel's official statements. Authorized accounts are managed and written by the Hotel personnel as well as by the staff of agencies and production companies to which the operational support of the authorized accounts has been contracted.

For more information, please refer to [What We Expect from Persons in Charge of Social Media Authorized by Liber Hotel at Universal Studios Japan].

\*You must not make any statements, regardless of whether privately as an individual or on behalf of the Hotel, which could be misconstrued as an official opinion about the Hotel's corporate activities or brand, other than through accounts authorized by the Hotel.

\*Each company of the Hotel and each partner company engaging in the Hotel's business operations is responsible for its personnel's compliance with these Action Guidelines.

### **1: [Basic Principles of These Action Guidelines]**

First of all, regardless of whether they are online activities or not, Staff Members taking part in the Hotel are required to act in compliance with the following values in order to achieve our vision of sustainable growth.

These Action Guidelines are intended to define how these values should be implemented in the social media field and to guide Staff Members in their participation in social media activities, both privately as individuals and on behalf of the Hotel. In the social media community, we must never forget "Who we are (marketing company)" and "What our role is (building our brand)." Although social media can be developed and adapted more quickly, easily, and less expensively than traditional media, the same basic rules and principles of messaging and communication apply as with traditional media.

The Hotel encourages Staff Members to engage in, explore, and participate in conversations on social media in a fun and steady manner, but when participating therein, we strongly urge each Staff Member to follow the values, business operation policies, and other rules set forth by the Hotel and act with decency and common sense.

### **2: [Commitments of Liber Hotel at Universal Studios Japan Regarding Social Media]**

The Hotel will act in accordance with its own core values in the social media community. Not only all the personnel, but we also expect all Staff Members taking part in the Hotel, regardless of their position or organization, including agencies, vendors, and suppliers, to conduct themselves in the same manner, and we will review individual activities and take appropriate action as necessary depending on the case.

## ■ Five Core Values of Liber Hotel at Universal Studios Japan in Social Media Activities

### 1. Ensure Transparency

We do not create pseudo-pages or send posts with the aim of controlling the flow of discussion on social media. The Hotel will make it known to the effect that all websites and fan sites managed by the Hotel are under the management of the Hotel. We also grant such pages the authority in accordance with appropriate internal protocols to track and verify as to whether or not the site is being operated properly. When we offer bloggers or users goods, money, or services, including product samples, or invite them to events, we ask that they mention it on their blogs, and we check the status of their performance.

### 2. Protection of Privacy of Consumers

Any and all personal information must be handled carefully in many different aspects, such as the form of collection, method of storage, and usage; with regard to all those aspects, we abide by the personal information protection policy and the relevant laws and regulations.

### 3. Respect for the Rights of Third Parties

We respect the rights of third parties, such as copyrights, trademarks, and portrait rights, in the social media field, including user-generated contents, without infringing on their rights. When verifying it and confirming the implementation, we will make appropriate judgments through our cross-divisional team, taking into consideration the differences in the circumstances of each user.

### 4. Responsibility for the Use of Technology

We will never cooperate with any organization or website that promotes the use of excessive tracking software, adware, malware, or spyware.

### 5. Listen Intently and Utilize Case Studies

We will listen to discussions in the Internet community and make every effort to ensure that these Action Guidelines always comply with the latest relevant laws and regulations and reflect appropriate standards of conduct.

## 3: [Use of Social Media by Personnel and Partner Companies]

The Hotel allows its personnel and Staff Members of partner companies engaged in business operations of the Hotel to use social media tools, such as blogs, as a part of their personal self-expression as well as for business projects. What is important here is that all of these related parties understand the full impact of what they say about the Hotel on the Internet, including social media, and recognize that the Hotel as a company must bear ultimate responsibility for this.

## ■ Things Expected of All Liber Hotel at Universal Studios Japan Personnel and Those of Our Partner Companies When Using Social Media

There is a big difference between speaking "on behalf of" the Hotel and speaking "about" the Hotel. The following applies to all the cases in which persons taking part in the Hotel talk about the brand and business activities of the Hotel by participating in social media activities, even in their own personal capacity.

### 1. Observance of Applicable Policies, etc., Including the Code of Business Operations

All Staff Members must comply with the business operation policies of the Hotel, the rules of employment for personnel of the Hotel and those of its partner companies who engage in the operations of the Hotel, their personal information protection policy, and other relevant policies and laws and regulations as may be established.

### 2. Serve as "Guardians" of Our Brand Value

In a world of countless social media, the cooperation of each and every one of those concerned is crucial to know how the Hotel and our brand are being talked about. If you find any postings, whether positive or negative, on the Internet that you think are important for the brand and corporate reputation of the Hotel, even if they are not directly related to your own work, please report them promptly to the persons in charge of social media in the marketing and public relations departments of the Hotel.

### 3. Leave Responses to Negative Postings to Experts and Do Not Decide by Yourself

Even if you see any negative or defamatory posts about the Hotel, do not engage in any arguments or debates at your own discretion. Only those who have participated in specialized training and have received a qualification are allowed to participate in the social media discussions "on behalf of Liber Hotel at Universal Studios Japan." If you see any problematic postings, please report them promptly to the persons in charge of social media in the marketing and public relations departments of the Hotel.

### 4. Give Special Consideration to Work-Related Statements

The boundary between business-related statements and one's own private statements can be very blurred on social media. While we respect the freedom of speech of our Staff Members, you must never forget that your colleagues, superiors, and even business partners may also have access to, or be exposed to, these contents. Therefore, not only should you never disclose any confidential business information, you should also be fully aware that publicly stating a position contrary to the Hotel's official statements or interests could cause controversy and speculation that could damage the value of the Hotel brand.

#### **4: [What We Expect from Persons in Charge of Social Media Authorized by Liber Hotel at Universal Studios Japan]**

Just as in traditional mass media, it is important to protect and even enhance the reputation and brand value of the Hotel by engaging and participating in communications on the Internet about the Hotel and its brand, depending on the situation.

When speaking on behalf of the Hotel in social media as a person in charge who is authorized by the Hotel, the following points are required:

**1. Attend the predetermined training program and be authorized**

In order to comment on the authorized accounts determined by the Hotel on behalf of the Hotel, it is required to complete the prescribed training program and be authorized. This applies not only to the personnel of the Hotel but also to those of the agencies and production companies that support the operation of the authorized accounts.

**2. Make it clear that you are acting on behalf of Liber Hotel at Universal Studios Japan**

Communication on behalf of the Hotel officially is limited to that made within an authorized account permitted by the Hotel only. Therefore, an authorized account must clearly state that it is an authorized account of Liber Hotel at Universal Studios Japan.

**3. Keep a record**

It is important to keep a record (log) of conversations when officially making statements on behalf of the Hotel because conversations on the Internet are sometimes very immediate.

**4. Maintain the basic stance that "if you are not sure, don't post it"**

If you make statements on social media on behalf of the Hotel, you must avoid misleading and ambiguous statements and they must be precise. If you are not sure if the content is correct or will positively impact the reader, refrain from posting it. If you are unsure about how to handle a post, please consult with the person in charge of social media in the marketing and public relations departments.

**5. Never infringe on the rights of others**

When using contents of a third party, the right owner must be clearly stated in the post and you must confirm that permission has been obtained to use such contents.

**6. Remember that any local posts can be influential worldwide**

One of the good points about social media is that the whole world can be instantly connected across borders, cultures, and race, but what may be a correct statement in one country may be inaccurate or illegal in another. Therefore, you must never forget that your own comments may have global impacts.

**7. Be aware of the permanence of the Internet**

Once information is posted on the Internet, it may remain permanently on the record even if it is later deleted. If you are unable to convey your principles and opinions correctly and in context due to environmental restrictions, such as character limit, please deal with the situation by ways such as providing a link to a page where they can be found correctly expressed.

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TM Universal Studios. SH23-0089

[Reference: List of social media accounts authorized by Liber Hotel at Universal Studios Japan]

List of the Hotel's authorized accounts and official activities on social media

(\*As of July 2018)

■ Instagram

Liber Hotel at Universal Studios Japan Official Account

[https://www.instagram.com/liber\\_hotel/](https://www.instagram.com/liber_hotel/)

■ Twitter

Liber Hotel at Universal Studios Japan Official Account

[https://twitter.com/LIBER\\_HOTEL](https://twitter.com/LIBER_HOTEL)