



BLOOMIN' BRANDS, INC.

SOCIAL MEDIA POLICY

I. PURPOSE

Social Media plays an important role in promoting and supporting Bloomin' Brands, Inc.'s ("Company") identity, integrity and reputation in a manner consistent with our Principles & Beliefs and policies. This Social Media Policy ("Policy") is to assist Company team members in understanding and appreciating the role of Social Media in the workplace and how the use of Social Media by team members outside of the workplace may affect the Company.

II. DEFINITIONS

- "Social Media" refers to the means of interaction among people in which they create, share, exchange and comment on contents among themselves in virtual communities and networks using mobile or web-based technologies. Examples include: Facebook, Twitter, MySpace, user-generated videos (e.g., YouTube), picture sharing networks, message boards, phone applications, blogs, wikis, social forums, chat rooms, on-line virtual communities, and podcasts.

III. POLICY

A. Company Social Media. The Company formally participates in external Social Media through authorized corporate channels. Team members designated by the Marketing Department are responsible for the Company's participation in Social Media. Only team members designated by the Company in writing are authorized to speak on behalf of the Company within Social Media. [See Company's *Disclosure & Communications Policy (Policy #LG05)* on the Company's portal.]

B. Social Media use by Team Members. Recognizing that team members may participate in various forms of Social Media on their personal time, using their personal communication resources, this Policy also provides expectations and requirements for the responsible use of Social Media by team members as it relates to the Company. When posting on Social Media, team members should be clear that they are not speaking on behalf of the Company (it's better to note, for example, "I believe....", "It is my opinion...." and/or "I am not speaking on behalf of the Company"...).

The Company believes that all team members should remember to respect others and that what you do on Social Media can leave others with negative impressions of the Company (even if you are not an official spokesperson). This is because when using Social Media the lines between public / private and personal / professional are often blurred. Team members should take necessary steps to ensure that any content, photos, or discussions posted on these sites is an

appropriate professional reflection of yourself and one which does not violate any of the Company's policies. Remember that Social Media is not anonymous, nor does it forget. The best advice is to use sound judgment and common sense by adhering to the Company Code of Business Conduct & Ethics.

When using Social Media, many of the Company's policies may be impacted, including:

- **Code of Business Conduct & Ethics Policy (Policy #LG01)**
- **IT Security Policy (Policy #IT05)**
- **Insider Trading Policy (Policy #LG03)**
- **Disclosure & Communications Policy (Policy #LG05)**
- **Discrimination and Harassment Policy (Policy #LG06)**
- **Electronic Communications Policy & Internet Access Policy (Policy #IT02)**
- **Ethics & Compliance Hotline Policy (Policy #LG08)**
- **Protection of Confidential & Proprietary Information Policy (Policy #LG09)**
- **Data Retention Policy (Policy #IT04)**

Team members should report violations or concerns to their supervisor or the Company Communications Department. Complaints can also be made on the Company HR Hotline or the Ethics & Compliance Hotline.

If the Company determines that a team member has violated any Company policies (directly or indirectly) through Social Media (even while not during working hours), that team member will be subject to disciplinary action up to and including termination.

In addition to being subject to possible disciplinary action by the Company, posting inappropriate content to a Social Media site may subject you to liability under Federal and state laws. For example, you could be held personally liable under Federal and state laws with regard to any statements or photos deemed defamatory, obscene, discriminatory or harassing in nature, whether they pertain to the Company, other companies, team members, guests, business partners or other individuals. You may also be liable if you post confidential or copyrighted information belonging to others.

Nothing in this Policy is intended to restrict a team member's rights under any Federal, state or local labor or employment law, or regulation, to discuss wages and working conditions.

Below are some additional points of clarification:

- 1) Team members should not post content that refers to guests/customers in a derogatory manner. Team members should consider the impact of their statements when commenting on the Company, including other team members. If you have concerns about the Company please communicate them to your immediate supervisor or use one of the many internal problem solving/complaint resources provided to you (e.g. ethics hotline, points of contacts as described in our discrimination and harassment policy, etc.). Team members are expected to uphold the same standards of behavior and ethics towards other team members, guests and vendors outside of work as they do while at work.

For example, posting threatening comments, using abusive or hateful language, harassing customers or co-workers, posting obscene photos or using ethnic slurs is a violation of this policy.

- 2) It is a violation of Company Policy for any team member to publicly post confidential company documents or proprietary information.
- 3) Making statements about sales, future financial performance, pricing decisions or legal matters can get both you and the company into serious legal trouble.
- 4) Do not use Company Trademarks in any Social Media sites. The use of any Company-related logos, without prior approval from the EVP, Chief Brand Officer is a violation of Company policy. All team members are prohibited from using the Company name or any of its restaurant concepts to promote any products or opinions for personal benefit.
- 5) All team members must fully respect the privacy of customers, other team members and guests. Do not post any information, either positive or negative, that could compromise their privacy. For example, posting negative or derogatory comments concerning customers or their tipping habits is not appropriate. Doing so will result in disciplinary action.
- 6) It is a violation of Company policy to record videos, take photos or record conversations in the workplace without Company management approval. The use of any photography or recording devices for training or business purposes must be approved by the Joint Venture Partner responsible for the affected restaurant location or Company management. However, if a customer asks a team member to take a photo of their special occasion, the team member may do so but the team member may not retain or post those photos on any Social Media or public site.