

**MGO GLOBAL INC.**  
**Social Media Policy**  
Effective January 1, 2023

**PURPOSE**

MGO Global Inc. (the “Company”) recognizes that the Internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as Facebook, Twitter, blogs and wikis. However, employees’ use of social media can pose risks to the Company’s confidential and proprietary information, reputation and brands, and can jeopardize our compliance with business rules and laws.

To minimize these business and legal risks, to avoid loss of productivity and distraction from employees’ job performance and to ensure that the Company’s IT resources and communications systems are used only for appropriate business purposes, the Company expects its employees to adhere to the following guidelines and rules regarding use of social media.

Apart from personal use of social media in accordance with this policy, the Company encourages its employees to participate responsibly in these media as a means of generating interest in the Company’s products and services and creating business opportunities, so long as all of the Company’s rules and guidelines regarding social media usage, particularly in a business context, are strictly adhered to.

**COMPLIANCE WITH RELATED POLICIES AND AGREEMENTS**

All of the Company’s other policies that might apply to use of social media remain in full force and effect. Employees should always adhere to them when using social media. In particular, the following policies should be kept in mind:

- CODE OF ETHICS AND BUSINESS CONDUCT
- INSIDER TRADING POLICY
- EXTERNAL COMMUNICATIONS POLICY

Social media should never be used in a way that violates any other Company policies or employee obligations. If your post would violate any of the Company’s policies in another forum, it will also violate them in an online forum. For example, employees are prohibited from using social media to:

- Violate the Company’s IT resources and communications systems use policies.
- Violate the Company’s current Non-Disclosure Agreements with employees, business partners, suppliers, et al.
- Circumvent the Company’s Code of Ethics and Business Conduct policy.
- Defame or disparage the Company or its affiliates, customers, clients, business partners, suppliers, vendors or other stakeholders.
- Harass any employees in any way.
- Circumvent policies prohibiting unlawful discrimination against current employees or applicants for employment.
- Violate the Company’s privacy policies; for example, never access private password protected sites of co-workers or other Company stakeholders without permission.
- Violate any other laws or ethical standards; for example, never use social media in a false or misleading way, such as by claiming to be someone other than yourself or by creating an artificial “buzz” around our business, products or stock.

Employees should also never provide references for stakeholders on social or professional networking sites – positive or negative – which can be attributed to the Company and create legal liability for yourself and the Company, such as interference with prospective business contracts and allegations of wrongful termination.

**NO EXPECTATION OF PRIVACY**

All contents of the Company’s IT resources and communications systems are the property of the Company. Therefore, employees should have no expectation of privacy whatsoever in any message, files, data, document, facsimile, telephone

conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on the Company's electronic information and communications systems.

You are expressly advised that in order to prevent misuse, **THE COMPANY RESERVES THE RIGHT TO MONITOR, INTERCEPT AND REVIEW, WITHOUT FURTHER NOTICE, EVERY EMPLOYEE'S ACTIVITY USING THE COMPANY'S IT RESOURCES AND COMMUNICATIONS SYSTEMS, INCLUDING, BUT NOT LIMITED TO, SOCIAL MEDIA POSTINGS AND ACTIVITIES; AND YOU CONSENT TO SUCH MONITORING BY YOUR ACKNOWLEDGEMENT OF THIS POLICY AND YOUR USE OF SUCH RESOURCES AND SYSTEMS.** This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems, as well as keystroke capturing and other network monitoring technologies.

The Company may also store copies of such data or communications for a period after they are created and may delete such copies from time to time without notice.

Do not use the Company's IT resources and communications systems for any matter that you desire to be kept private or confidential from the Company.

## **PERSONAL USE OF SOCIAL MEDIA**

We recognize that employees might work long hours and occasionally may desire to use social media for personal activities at the office. We authorize such occasional use so long as you use your own personal computing devices for the purpose of engaging in social media postings; your posts do not involve unprofessional or inappropriate content and your posting does not interfere with your employment responsibilities or productivity. While using social media at work, circulating chain letters or other spam is never permitted. Circulating or posting commercial, personal, religious or political solicitations, or promotion of outside organizations unrelated to the Company business are also prohibited.

## **BUSINESS USE OF SOCIAL MEDIA**

If you are required to use social media as part of your job duties, for the Company's marketing, public relations, recruitment, corporate communications or other business purposes, you should carefully review "Guidelines for Employees' Responsible Use of Social Media," which follows in the next section. If your job duties require you to speak on behalf of the Company in a social media environment, you must still seek approval for such communication from your direct supervisor, who may require you to undergo special training before you do so and impose certain requirements and restrictions with regard to your activities. Likewise, if you are contacted for comment about the Company or one of its affiliates for publication, including in any social media outlet, direct the inquiry to the Company's Director of Communications, Dodi Handy, at [dhandy@mgoteam.com](mailto:dhandy@mgoteam.com); and do not respond without written approval.

## **GUIDELINES FOR EMPLOYEES' RESPONSIBLE USE OF SOCIAL MEDIA**

The above material covers specific rules, policies and contractual obligations that employees must follow in using social media, whether for personal or business purposes, in consideration of their employment and subject to discipline for violations. The following sections of the policy provide our employees with common-sense guidelines and recommendations for using social media responsibly and safely, in the best interests of the Company and its subsidiaries. These guidelines reflect the "duty of loyalty" every employee owes its employer, and are intended to add to, not contradict, limit or replace, the applicable mandatory rules, policies and contractual obligations above.

**In addition, the below sections will provide for additional guidelines for Tier 1 employees, defined by the Company as executive officers, senior department managers and designated spokespeople, who will be encouraged to employ and apply an elevated level of sensitivity on all social media activities in which they engage, either personally or on behalf of the Company. For the purpose of these guidelines, any employee who is not an executive officer, department manager or designated spokesperson will be defined as a Tier 2 employee.**

## PROTECT THE COMPANY'S GOODWILL, BRANDS AND BUSINESS REPUTATION

the Company prohibits all Tier 1 and Tier 2 employees from posting disparaging or defamatory statements about the Company or its business interests, but you should also avoid social media communications that might be misconstrued in a way that could damage the Company's goodwill and business reputation, even indirectly.

All Tier 2 employees should make it clear in your social media postings that you are speaking on your own behalf. Write in the first person and use your personal email address when communicating via social media. You are personally responsible for what you communicate in social media. Remember that what you publish might be available to be read by the masses (including the Company itself, future employers and social acquaintances) for a long time. Keep this in mind before you post content.

If you, as a Tier 2 employee, disclose your affiliation as an employee of the Company or its subsidiaries, it is recommended that you include a disclaimer that your views do not represent those of your employer. For example, consider such language as "the views in this posting do not represent the views of my employer."

If you, as a Tier 1 or Tier 2 employee, communicate about your work or the Company and its subsidiaries in general, you should disclose your connection to and role at the Company, but be sure to reiterate that your views do not necessarily represent those of the Company. Use good judgement about what you post and remember that anything you say can reflect on the Company, even if you do include a disclaimer. Always strive to be accurate in your communications about the Company and remember that your statements have the potential to result in liability for yourself or the Company. Be respectful to the Company and be professional and honest in your communications.

If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from making the communication until you discuss it with the Dodi Handy, who can be reached at [dodi.handy@mgoteam.com](mailto:dodi.handy@mgoteam.com) or 407-960-4636.

If you see content in social media that disparages or reflects poorly on the Company or its stakeholders, you should contact Dodi Handy. Protecting the Company's goodwill, brands and reputation is every employee's job.

**FURTHER GUIDELINES FOR TIER 1 EMPLOYEES: When posting to social media sites, Tier 1 employees should apply extreme sensitivity to what you are posting as a comment, reply to another post and/or when liking or disliking a particular post made by another individual. All Tier 1 employees should bear in mind that their social media activity will likely be subject to extraordinary scrutiny by others who may be following the Tier 1 employee in any particular social media or professional networking channel, which could lead to potential misinterpretation, unnecessary and/or inaccurate speculation and rumor mongering.**

## RESPECT INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

The Company's External Communications Policy restricts all Tier 1 and Tier 2 employees' use and disclosure of the Company's confidential Material, Non-Public information. In addition, it is imperative that confidentiality be maintained with respect to any information relating to the Company and its affiliates' intellectual property. Beyond these mandatory restrictions, you should treat the Company's valuable trade secrets and other confidential information and intellectual property accordingly and not do anything to jeopardize them through your use of social media. In addition, you should avoid misappropriating or infringing the intellectual property of other companies and individuals, which can create liability for yourself and for the Company and its subsidiaries.

Do not use the Company's logos, brand names, taglines, slogans or other trademarks, or post any confidential or proprietary information of the Company without prior written permission from Dodi Handy at [dhandy@mgoteam.com](mailto:dhandy@mgoteam.com).

To protect yourself and the Company against liability for copyright infringement, where appropriate, reference sources of particular information you post or upload and cite them accurately. If you have any questions about whether a particular post or upload might violate the copyright or trademark of any person or the Company (outside of "fair use" exceptions), ask Dodi Handy before making the communication.

## **RESPECT AND COMPLY WITH TERMS OF USE OF ALL SITES YOU VISIT**

Do not expose yourself or the Company to legal risk by using a social media site in violation of its terms of use. Review the terms of use of all social media sites you visit and ensure your use complies with them. Pay particular attention to terms relating to:

- Prohibitions or restrictions on the use of the social media site, including prohibitions or restrictions on use for advertising, marketing and promotions or other commercial purposes (for example, *Facebook's Statement of Rights and Responsibilities* prohibits businesses from administering promotions through Facebook without Facebook's prior written consent).
- Ownership of intellectual property used on, or information collected or generated through use of, the site (for example, any of the Company's copyrighted material and trademarks that might be posted on the site, or customer information the Company collects through the site).
- Requirements for licenses or other grants allowing use by the site owner and other third parties of the Company's trademarks or other intellectual property.
- Privacy rights and responsibilities of the site owner and users.

## **RESPECT YOUR CO-WORKERS AND OTHER THE COMPANY STAKEHOLDERS**

Do not post anything that your co-workers or the Company's customers, clients, business partners, suppliers, vendors or other the Company stakeholders would find offensive, including ethnic slurs, sexist comments, discriminatory comments, insults and/or religious or political solicitations.

Do not post anything related to your co-workers or the Company's customers, clients, business partners, suppliers, vendors or other the Company stakeholders without their written permission.

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