

WEST MARINE, INC. & SUBSIDIARIES' SOCIAL MEDIA POLICY

PURPOSE AND SCOPE

Social media offers the opportunity for people to gather in online communities of shared interest and create, share or consume content. West Marine, Inc. and its Subsidiaries (collectively, "West Marine" or the "Company") respects your right to participate in social media and understands that your time outside of work is your own. West Marine also values its established brand reputation and goodwill relationships, which are important corporate assets. For that reason, this Social Media policy ("Policy") applies to both Company-sponsored social media and personal use as it relates to West Marine. This Policy is designed to provide guidance to Associates who use social media either as part of their jobs or in a personal capacity as to the Company's expectations, especially where the social media engagement is about West Marine or its products, people, competitors, and/or other business-related individuals or organizations. The purpose of the Policy is to guide your participation in the ever-evolving world of social media, both when you are participating personally, as well as when you are acting on behalf of West Marine.

EXAMPLE SOCIAL MEDIA PLATFORMS

Personal blogs, websites, message boards, bookmarking sites, forums, collaboration tools and discussion threads/postings, as well as social commerce postings, such as product or experience reviews, shopping engines, affiliate networks, etc. which include, without limitation: YouTube, Instagram, Pinterest, Wikis, Twitter, Tumblr, Facebook, MySpace, Flickr, RenRen, LinkedIn, Legal OnRamp, and Foursquare.

This Policy applies to all Company Associates and contractors and any other person who is notified that this Policy applies to them. It applies if you are authorized to represent West Marine on social media platforms or if you choose to make references to West Marine when you are using social media in a personal capacity

Nothing in this Policy is intended to preclude or dissuade Associates from engaging in activities protected by state or federal law, including the National Labor Relations Act, such as discussing wages, benefits or terms and conditions of employment, raising complaints about working conditions for their and their fellow employees' mutual aid or protection or legally required activities.

GUIDANCE FOR ALL USERS OF SOCIAL MEDIA

Be Transparent and Mindful of Laws that Apply to Your Posting. If you are writing about a topic in which West Marine is involved, but you are not the spokesperson on the topic, make it clear that you are speaking for yourself and not on behalf of West Marine. Additionally, the Federal Trade Commission Endorsement Guidelines requires you to let readers know if you work for (or sell product to) West Marine when you endorse a product sold by West Marine. If you mention West Marine on a personal blog or Social Networking account, you must be clear and open about the fact that you are an Associate, supplier or have some other relationship with West Marine and include a disclaimer that specifically states that the opinions and attitudes expressed are yours alone and may not be aligned with those of West Marine, fellow Associates, customers, suppliers or people working on behalf of the Company. You may say something like "*I'm John Lastname and I am a member of the West Marine's Communications Team...*" or "*I supply XYZ product to West Marine...*" and "*The postings on this site are my own and don't represent West Marine's positions, strategies, or opinions.*" This disclosure is equally important for any agency/vendor/partner/third party who is representing our Company online. Also, you are obligated to follow the rules for the particular platform you are using (such as terms of service for the site you're posting on).

Be Truthful. Post what you believe to be factual, honest and respectful.

Protect Against Wrongful Disclosure of Personal Information and Company Confidential/Trade Secret Information. Let's face it, no one wants their privacy invaded or their personal information used without their permission. West Marine and all Associates have an extra duty to ensure that the personally identifiable information of our customers, colleagues and business partners is handled with the utmost protection in mind. The term "personal information" means any written or electronic information that relates to an identified or identifiable person. In practice, this means any information that can reasonably be used to identify a living person, including factual information about

such person, such as their name, address, telephone number, social security number, credit card numbers, account information, e-mail address or information relating to the health condition (physical or mental) of an individual, as well as information about his/her opinions or beliefs. You may disclose personal information only to those authorized to receive it in accordance with West Marine's applicable policies.

Additionally, during your work, you may become aware of Company proprietary, non-public financial or operational information. This includes Company strategies, forecasts, products, promotional activities, pricing, financial or trade secret information that has not been made public. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post such non-public financial or operational information including internal reports, policies, procedures or similar business-related confidential communications. If you have a question, speak with our Chief Financial Officer or General Counsel to ensure compliance with Company policies and applicable law relating to disclosure of material non-public information regarding the Company.

If the Press Comes Knocking. Associates should not speak to the media on West Marine's behalf without contacting the Communications Department. All media inquiries should be directed to them.

About Your Hours - Be Responsible at Work. Please make sure that you check with your manager for specific department requirements regarding use of Social Networking sites during work time. Such use may interfere with your work responsibilities or otherwise violate our *Associate Handbook, Living Our Values – West Marine's Code of Ethics* or your departmental or other Company policies. Non-exempt hourly Associates should only engage in Social Media activities for work purposes when authorized to do so and when scheduled or requested, in writing, to work. All hours worked, including any work performed using Social Media, must be recorded on the Associate's time sheet –even if only for a few minutes. Failure to limit work-related Social Media activities to work hours and/or failure to record time worked in accordance with Company policy will result in disciplinary action.

Conflicts of Interest. Ensure that your posts do not create a real or perceived conflict of interest. A conflict of interest exists if you have an interest outside of your work at West Marine that interferes with your job responsibilities or may affect your judgment on behalf of the Company. For example, accepting direct advertising or any type of compensation (including products, samples or experiences with value) from a vendor for a blog or social media site may influence how you work with that vendor, and create a real or perceived conflict of interest. See *Living our Values- West Marine's Code of Ethics* on WestMarine.com or ask the Legal or Human Resources Departments for additional guidance.

Management Responsibility. By virtue of their position, managers and executives must consider whether personal thoughts they publish may be misunderstood as expressing a Company position. Be aware that a blog or other public forum is not the place to communicate Company policies to Associates.

Use of Company Trademarks & Logos: Except for incidental and non-commercial use, the West Marine logo and trademarks are not to be placed on Social Networking sites unless they are Company official communications approved by our Marketing or Legal Department.

Once it's Posted, it's Always Posted. Social Media lets you communicate incredibly fast and have your message go viral in seconds. This makes it difficult to fix an inaccurate message once you've shared it. The best thing to do is "think" before you link.

If You Make a Mistake, Own It. We don't always get it right the first time. That's why when we do mess up, we should not hesitate to correct a statement we've made or to just apologize if it feels like the right thing to do.

Follow the Rules. You are solely responsible for what you post online. Carefully read this and other Company policies and ensure your postings are consistent with them. Also, before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow Associates or otherwise adversely affects customers, suppliers or other people who work on behalf of West Marine or its legitimate business interests may result in disciplinary action up to and including termination.

Give Credit where Credit is Due and Don't Violate Others' Rights. Do not claim authorship of something that is not yours. If you are using another party's content, make certain that they are credited for it in your post and that they approve of you using it. It's just the right thing and the legal thing to do.

ADDITIONAL CONSIDERATIONS AND LEGAL STUFF

Social Media Account Ownership. If you participate in Social Media activities as part of your job at West Marine, that account may be considered West Marine property. If so, you don't get to take it, or the information it contains, with you if you leave West Marine — meaning you can't change the password or the account name or create a similar sounding account or have any ownership of the contacts and connections you have gained through the account. Any and all social media and other online accounts and profiles created or used by you on behalf of West Marine or otherwise for the purpose of promoting or marketing West Marine products, its affiliated companies or for other similar business purposes, including such profiles and accounts featuring or displaying West Marine's name and trademarks ("**Company Social Media Accounts**"), belong solely to West Marine. West Marine shall own all Company Social Media Accounts regardless of the Associate who opens the account or uses, manages or accesses it. Each Company Social Media Account includes any and all log-in information, data, passwords, trademarks and content related to the profile or account, including all followers, subscribers and contacts. This doesn't apply to personal accounts which you may access at work, but would certainly apply to all West Marine-branded accounts created as part of your job.

Discrimination / Harassment / False Accusations. You cannot engage in any conduct, activities, communication or postings which violate the law and/or Company policies regarding discrimination and harassment. Inappropriate postings that include discriminatory remarks, harassment, threats of violence, or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination. Remember, any conduct which is impermissible under the law if expressed in any other form or forum is also impermissible if expressed through blogs, social networks, or other electronic means. But please be reminded that nothing in this Policy is intended to preclude or dissuade Associates from engaging in activities protected by state or federal law, including the National Labor Relations Act, such as discussing wages, benefits or terms and conditions of employment, raising complaints about working conditions for their and their fellow employees' mutual aid or protection or legally required activities.

Right to Monitor. West Marine reserves the right to monitor all public blogs and Social Networking forums for the purpose of protecting its interests and/or monitoring compliance with Company policies. West Marine reserves the right to access any Company computers and other equipment to monitor blogs and on-line websites. Associates should not maintain any expectation of privacy with respect to information transmitted over, received by, or posted on such sites.

Reporting / Retaliation Prohibited. If you believe that a blog or other online communication violates any Company policy, you should immediately report it to your supervisor, a member of the Asset Protection team, the Legal Department or to the Human Resources Department (or you may report it anonymously through the Network Hotline). West Marine may investigate the matter, determine whether that blog, posting, website, or communication violates Company policies, and take appropriate action. The Company prohibits taking negative action against any Associate for reporting a possible deviation from this Policy or for cooperating in an investigation. Any Associate who retaliates against another Associate for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

Violations of Policy. Any Associate who violates this Policy may be subject to disciplinary action, up to and including termination. Additionally, violations of this Policy could result in criminal prosecution, reimbursement of expenses incurred as a result of the violation, and additional legal action.

Policy Modifications. *As technologies, products and practices evolve, so will this Policy. Associates should regularly evaluate their social media efforts in conjunction with this Policy and other important Policies such as our Living Our Values – West Marine's Code of Ethics and the policies contained in our Associate Handbook.*