



SOCIAL MEDIA POLICY AND PROCEDURE

2023 - 2024

Authorization, Ownership and Document Control	
Owner	Head - Human Resources
Approver and Date	Board of Directors
Validity of the Policy	This Policy shall remain valid from the Effective Date till reviewed.
Periodicity of Review	This Policy should normally be reviewed annually. In any case, the gap between two reviews shall not be more than 24 months.
Version	1.0
Effective Date for Version 1.0	October, 2023
Further Information	
Contact	Questions regarding this policy should be directed to Human Resources, SBI-SG Global Securities Services Pvt Ltd, Mumbai.

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Scope

The SBI-SG social media policy applies to all the SBI-SG employees, consultants /advisors, assigned workers, as well as to third parties performing services on behalf of SBI-SG.

Purpose

- Encourage SBI-SG employees and our stakeholders to have an open exchange of ideas in the collaborative interest of the company.
- Utilize the opportunities provided by social media services to protect and nurture SBI-SG's brand image, marketing, and communication capabilities.
- Promote SBI-SG to colleagues, customers, media, and the other SBI-SG stakeholders.
- Provide referential guidelines for ethical and appropriate usage in an individual's professional as well as personal capacity.

Participation in Social Media and Guidelines

There are two kinds of participations in social media – Company Endorsed/Sponsored and Individual.

The following is an explanation of these two types of participation and guidelines that may be applicable,

SBI-SG Endorsed/Sponsored Participation

SBI-SG endorsed/sponsored participation is that which is authorized on behalf of the company. This defines the company as a user and a participant in social media, and it empowers authorized employees to manage the company's presence in external social media for business purposes. This would include, but not limited to channels like the company's Facebook page, X handle, LinkedIn page, Instagram handle, YouTube channel, and WhatsApp group etc.

a. Business/Official Accounts or Handles: Business accounts/handles are to be created in consultation with the assigned individual(s)/appointed agency/functional representative to manage SBI-SG social media handles. These accounts can be created basis the following guidelines, which if compromised, may result in disabled/inaccessible accounts by the respective social media platforms.

1. There are sufficient stories and content churn from within the business to sustain a long-term social media presence.
2. There is a dedicated individual/team/agency for the purpose of driving, populating, and monitoring social media content.
3. It is ensured that the content strategy, operations, artworks, content calendar and social media presence is within the guidelines/rules prescribed in this social media policy, respective social media platform, and duly approved by the authority.
4. Ensure a consistent and professional image by implementing a standardized and formal response template for addressing comments, requests, or posts on official handles, or elsewhere, with regards to SBI-SG.
5. Login, Password, and Admin rights of the official handles should not be accessible to anyone falling outside of the authorized/assigned individual(s) realm.

b. Authorization and Content Approval Requisites:

1. **Accounts/Handles:** New official accounts/handles across any social media platform may be actioned only with the approval of the company MD, and DMD.

2. **Content:** Posts in form of any media format across any/all official handles of SBI-SG, are to be issued post the approval of the company MD, and DMD.
3. In the case of function specific posts like Human Resources, Business Development, Marketing, etc. respective functional heads may/may not be involved in the review and approval process.
4. SBI-SG Endorsed/Sponsored Participation at any event on social media is to be executed/managed by the appointed employees/third party group/ Individual(s)/ agency, only. Content that is issued for such sponsored participation by a third party/entity, shall be subjected to content review by the assigned individual(s) and/or the functional heads, and approval by the company MD and DMD.

Individual Participation

Individual participation applies to those instances in which SBI-SG employees, associates, vendors, and other stakeholders, participate in their personal capacity across Social Media Platforms. These are not endorsed by the company. Examples of these would be Facebook profiles of individuals, X handles, LinkedIn profile, Blogs, and WhatsApp, etc.

While encouraging participation, SBI-SG also provides certain guidelines (Do's and Don'ts in the Annexure) to protect the common interest, while participating in social media.

Tracking, Reporting and Disciplinary Actions

Tracking

- a. SBI-SG reserves the right to track comments or discussions about the company, issued by any entity, including employees and non-employees, on the external and internal social media platforms.
- b. SBI-SG reserves the right to seek clarification on any content posted on social media by an employee or non-employee at any point of time and block/delete content that conflicts with SBI-SG Values and/or violates the SBI-SG's social media policy, and/or concerns company reputation.
- c. SBI-SG would not be accountable for any content/opinion/comment etc., posted by an employee or a non-employee on public affairs, civic issues, customer feedback, and/or on fellow SBI-SG employees/associates on social media.

Reporting

SBI-SG strongly urges its stakeholders to report any violation, or possible, or perceived violations to supervisors, or Human Resources representatives. Violations include negative discussions of SBI-SG, its employees and clients, any discussion of proprietary information and any unlawful activity related to social media.

Disciplinary Action

- a. SBI-SG will responsibly respond to all reports of any violations of the social media policy.
- b. Violations of the SBI-SG social media policy by any employee will be treated seriously and may lead to appropriate disciplinary action(s) basis the nature and factors of violation, facilitated by the Human Resources as under the HR policy.
- c. Complainant/Reporter will be protected from any intimidation, victimization, or discrimination for bringing a complaint under this policy or taking part in any investigation unless they have acted in bad faith or have made untrue statements. Any retaliation against a complainant/reporter for bringing a complaint will be treated as a disciplinary offence as under the whistleblower policy.

CODE OF CONDUCT

Listed below, are standard code of conduct exercised by experienced global practitioners of social media - to further our understanding and enhance our social media interactions, in our individual capacity. This would include, but not limited to channels like the company's Facebook page, X handle, LinkedIn page, Instagram handle, YouTube channel, and WhatsApp group etc.

A. Decorum/Code of conduct for employees in the company while using internet or social media.

1. No employee of the Company shall establish/ form/ promote any group/community on any internet site which uses the name or logo of SBI-SG/ SBI-SG Global Securities Services or likewise or shall become member of any such group or community unless such group is expressly created or permitted by the company.
2. If any employee of the company is creating any social network profile, he/she should create such profile in his/ her real name and shall neither create any profile by using any ID otherwise than his/ her real name nor use the business email address on personal blogs or public social networking sites.
3. No employee shall write/express anything on any internet site or social media that may damage the reputation of the company or any of its employees as regards such employees working in SBI-SG.
4. No employee shall post, forward, upload or express any remarks/ views on any internet site or social media or share a link of any content on social media which may be defamatory, indecent, abusive, discriminatory, or derogatory to the company or its officials/ employees in their official capacity.
5. No employee should criticize the management or the business processes or strategies or policies of SBI-SG on any internet site or social media.
6. No employee shall discuss, disclose, post, forward, upload or share any content related to any colleagues, competitors, customers, suppliers or other third parties including their personal details on any internet site or social media without their prior consent.
7. No employee shall post, forward, upload or share any such information on social media which may result in breach of intellectual property rights.
 - a. Do not post unverified and inaccurate information, even if it is of a positive nature, on any social media channel, about SBI-SG or any other individual or business entity. This also includes contribution to Wikis such as Wikipedia.
 - b. Do not discuss organizational announcements and forward-looking statements or deals under discussion/negotiation which demand confidentiality.

- c. Do not discuss or disclose internal operations of SBI-SG, internal mailers/videos, or information on the company intranet.
8. No employee shall without express authority use the name SBI-SG or SBI-SG Global Securities Services or likewise, while expressing any views in any of the internet sites/social media.
9. No employee shall engage in collusive behavior on any internet site or social media, with SBI-SG's competitors or employees.
10. No employee shall canvass for any donation, lottery or third-party marketing/business promotional activities/ affairs on any internet site or social media.
11. No employee of the Company without obtaining prior written approval from his/her supervisor:
 - a. Shall express/forward any view on any internet site or social media about the working of SBI-SG or the business of SBI-SG or about SBI-SG or any of its officials.
 - b. Shall express/ forward any views or opinion on behalf of the Company or by using his/ her official position in the Company. Or in credible circumstances, adhere to the regulations under the disclosure of identity.
 - c. Shall publish/ forward any official information/ circulars/ memorandum/ documents etc. which are of the record of the Company.
12. Use of social media and websites during office hours should complement the role assigned and not interfere with office duties.
13. Be the first to respond to one's mistakes. In case of an error, admit it and correct it quickly. Regarding any modification of an earlier post, inform the concerned authority, with accountability.

B. Adherence and Other Terms & Conditions

- a. Be fully aware of the SBI-SG social media policy; consciously always adhere to it, irrespective of whether the actions are for personal interest or on behalf of the company. Be always fully aware that any violation will poorly reflect on the company, as well as on oneself.
- b. Read the '*Terms and Conditions*' and/or '*User Protocols*' of the social media channels. Adhere to the specific boundaries, terms and conditions, and community guidelines set by each network.
- c. Just as one would not violate the SBI-SG Policies or one's own values, expect the same of other users. Never ask anyone to misrepresent, mislead, deceive, or defame other users for individual or SBI-SG's benefit.

C. Disclosure

- a. Disclose one's relationship with SBI-SG if relevant to the subject of the conversation. Recommended phrase: "Disclosure: The author is an employee of SBI-SG. The opinions expressed herein are my own and do not reflect those of the Company".
- b. While engaging in conversations on subjects with specific reference to SBI-SG and SBI-SG business interests, disclose one's relationship appropriately. For example, on X, the hashtags "#employee" or phrase "Disclosure: SBI-SG Employee" or "Tweets are my own, not SBI-SG's" along with the actioned tweet/post may be used.
- c. While commenting on blogs/websites/communities/discussion forums with a specific reference to SBI-SG, always disclose one's relationship with the company and leave a functional email ID.
- d. Comply with all guidelines and regulations regarding disclosure of identity.

D. Prevention of Plagiarism and Infringement of Copyright

- a. Avoid posting any copyrighted content to any social media site, without permission with a purpose to capitalize on the content by any means. This may cause repercussions for both the individual/the company.
- b. Violation of any guidelines concerning the name, trademark, or logo of the company, and/or its parent organizations will be treated as a disciplinary offence as under the Brand Licensing Agreements of SBI-SG.
- c. Plagiarism is an immoral act and not perceived as a crime. In India, it is governed by the section 57, 63 and 63 (a) of the Copyright Act. Copyright violation is using the authors' work without permission, whereas in plagiarism, it is used without attribution. Even with limitations on social media or any other digital platforms – caution must always be exercised.