

SOCIAL MEDIA POLICY

(As amended by the Board on 03.02.2023)

A) Introduction:

Social Media (such as websites for social networking and microblogging) offers promising opportunity to engage with customers, suppliers, investors, and other stakeholders in sharing views, obtaining feedbacks, engaging in conversations/discussions. It also serves as a low-cost platform for issuing advertisements relating to the Company and its products to reach a broader audience. Social Media is a tool of engagement and a detailed policy regarding the participation and usage would help employees utilize social media as a platform/tool to reach out and share work related details or to provide relevant and timely information to the public in a socially/legally acceptable manner.

Further, social media depends on mobile and web-based technologies to create highly interactive platforms through which individuals and communities share, co-create, discuss, and modify user-generated content.

B) Purpose

The purpose of this policy (hereinafter referred to as MAFIL Social Media Policy) is to outline the requirements expected of the staff (including permanent/contractual employees, consultants, and/or vendors) when using social media as a representative/employee of MAFIL (authorised or otherwise; whether operating from workplace or otherwise). In the official capacity, the social media tools may be used for purposes like reaching out to a wider audience, engagement with customers, getting feedback from them, summarising the opinions and views of public/customers and reporting the same for information, analysis and decision-making purpose to seniors, committees, management, board, etc. as and when required.

C) Definition

Social media is the term commonly given to internet-based channels and tools that allow users to interact with each other to share opinion and content. As the name implies, social media involves building communities and networks that encourage participation and engagement. Social Media comprises relatively inexpensive and accessible web-based tools that enable anyone to publish or access information. In contrast, conventional (or mainstream) Media generally requires significant resources to publish information.

Social Media includes:

- Social Networking Sites (fore.g., Facebook, LinkedIn, Twitter, Instagram etc.)
- Advertisements, Posters, Videos and Photo sharing websites (for e.g.: YouTube, Instagram)
- Blogs, including corporate & personal blogs with “Public Comments” or “Reviews”
- Sharing Curricular activities through Micro-Blogging (fore.g.: Twitter)
- Forums, Discussion boards and groups (fore.g.: Google/Yahoo Groups, Quora)
- Messaging services (for e.g.: WhatsApp, Telegram including SMS)

D) Broad Classification:

- **Social Networks** - Services that allow users to connect with people of similar interests and background. Usually they consist of a profile, various ways to interact with other users, ability to setup groups, etc. *The most popular are Facebook and LinkedIn.*
- **Social News** - Services that allow users to post various news items or links to outside articles and then allows its users to ‘vote’ on the items. The voting is the core social aspect as the items that get the most votes are displayed the most prominently. The community decides which news items get seen by more people.
- **Media Sharing** - Services that allow users to upload and share various media such as pictures and video. Most services have additional social features such as profiles, commenting, etc. *The most popular are YouTube and Flickr and Instagram.*
- **Micro-blogging** - Services that focus on short updates that are pushed out to anyone subscribed to receive the updates. *The most popular is Twitter.*
- **Blog Comments and Forums** - Online forums allow members to hold conversations by posting messages. Blog comments are similar except they are attached to blogs and usually the discussion centres around the topic of the blog post.

There can be overlap among the various services. For instance, Facebook has micro-blogging features with their “status update”. Also, Flickr and YouTube have comment systems like that of blogs.

E) Scope & Related Policies

MAFIL adheres strongly to its core values in the online Social Media community and the Company expects the same commitment from all the staff. Any staff who fails to comply with this policy may be subject to disciplinary review/other appropriate action, and in serious cases, termination of employment. The Policy is applicable to all staff and management of MAFIL.

The MAFIL Social Media Policy is to be read in context with other related MAFIL Policies such as POSH policy, Fair Practice Code etc.

F) Core Social Media Values:

MAFIL is guided by certain shared values that we all live by as an organization and as individuals including integrity, teamwork, harmonious conduct and taking pride in fulfilling our promises.

To be consistent with Company's values, all staff must act in a manner which will maintain public confidence and trust in the company. This requires all staff to act with due consideration for the following:

- Respect for the law
- Respect for the system of government
- Respect for the community and its people
- Integrity and Ethics
- Accountability
- Diligence and professional conduct

The five core values of Social Media Policy are:

➤ **1. Transparency**

- i) MAFIL requires all staff who are communicating on behalf of the Company shall always disclose their name and their designation.
- ii) Do not use false or fake identification.

➤ **2. Protection of Company's privacy:**

Be aware of any information that the Company collects, including how the same is collected, stored, used, or shared, all of which should be done pursuant to applicable privacy policies, laws, and IT policies.

➤ **3. Adherence**

- i) All staff must adhere to copyrights, trademarks, and other rights in the online Social Media environment
- ii) Do not claim the rights of something that is not yours. If you are using another party's content, make certain that the necessary permissions are received from the rights-holder(s) and due credit is given, wherever needed.
- iii) Staff shall follow all rules, regulations, policies regarding the sharing of information, collection of data, providing views, uploading videos, sharing posters, publishing advertisement etc.

- iv) There may be instances where the sharing of articles, websites, or online information produced by outside sources is appropriate. This information will be directly related to the work of the Company. This could include newspaper articles, different websites, other regulatory and/or planning agencies or other informative relevant content.

Company may share these items as “information only” without appearing to endorse, support or having responsibility for the accuracy of these items.

➤ **4. High Ethical standards:**

Employees must adhere to the “Staff Code of Conduct” and must not deviate on any of its provisions. Some of the circumstances are mentioned below:

- i) Do not use defamatory, offensive, abusive or derogatory language or content.
- ii) Do not make personal attacks and absolutely no hate speech or rumour mongering.
- iii) You should not state or imply that your personal opinions and content are authorised or endorsed by the Company. It is advisable to use a disclaimer such as “views/ opinions are personal” to avoid any misunderstanding.
- iv) Do not post/share/like any content that promotes or shows discrimination on the basis of race, creed, colour, age, religion, gender, marital status, national origin, physical or mental disability or sexual orientation, political alliances.
- v) Do not make/share/like comments in support of or opposition to political parties or ballot measures or which are politically biased.
- vi) Do not post/share/like harmful material or sexual content.
- vii) Do not conduct or encourage illegal activity
- viii) Do not share information that may tend to compromise the safety or security of customers or employees of the company, except if required by law.
- ix) Do not post anything that violates any law
- x) Do not post statements that are not original. You may provide links to the content, if it does not violate any rules/regulation/policy
- xi) No off-topic content or false information
- xii) No objectionable links

If any information, article, images, videos or any other material is deemed questionable, then Company has the right to use its discretion to remove the same from its social media sites which violates this policy. Company may also use the ‘Blocking’ feature for repeat offenders of the content guidelines and may also take appropriate disciplinary actions.

➤ **5. Best practices to follow**

The company and its officers shall adhere to the best practices in usage of social media platforms. Some of the best practices are given below.

- Listen to the online community and comply with applicable regulations to ensure that these Social Media guidelines remain current and reflect the most up-to-date and appropriate

standards of behaviour.

- Ensure our Brand is consistently portrayed in all platforms and sites
- Follow content approval process before posting
- Be respectful in expressions, conduct and verbal interactions
- Be mindful of the regulatory oversight the company is subject to in terms of its business governance and conduct
- Not to engage in any action that may bring our company into disrepute
- Not to reveal Company/client sensitive information and/intellectual property
- Not to compromise on security and Governance considerations.
- Implement appropriate tools to monitor, evaluate and take appropriate action in case of any sensitive situations

Legal issues for adherence/ guidance

While engaging with social media the management and staff shall ensure that the following legal considerations are respected:

- Intellectual property (trademarks and copyrights)
- Defamation related laws and regulations
- Consumer protection
- Privacy (Human rights)
- Data protection rules

G) MAFIL & Social Media - Personal Use

a) Company recognizes that staff may wish to use Social Media in their personal life. This policy does not intend to discourage your personal expression or online activities. However, staff should recognize the potential for damage that may be caused (either directly or indirectly) to the Company in certain circumstances even by your personal use of Social Media.

As a rule, staff shall not comment on Company's policies and work-related matters. Staff shall not engage in online discussions on matters internal to MAFIL. Matters posted online and in social media are to be responded to by authorized spokesperson or officials of the company designated for this purpose.

b) Staff are encouraged to approach the online space in the same way they do the physical one – by using sound judgment and common sense, by adhering to the Company's values, and by following the Staff Code of Conduct and all other applicable policies.

c) Whenever an employee is transferred from the parent company to a subsidiary or vice versa, he/she is supposed to update the latest details regarding company and designation in his/her social media handles to avoid confusion and easy access.

The following set of principles/guidelines shall be considered while officially providing information, views, advertising or carrying out any other online activities on Company's behalf:

- Adhere to the Staff Code of Conduct and other applicable policies.

All staff are subject to Company's Code of Conduct in every public meeting. In addition, this policy

is also applicable to your personal online activities.

- Representative of MAFIL

As a MAFIL representative, it is important that your posts convey the same brand ethics that the Company instils in its communications. Be respectful of all individuals, races, religions and cultures; how you conduct yourself in the online Social Media space not only reflects on you, it is also a direct reflection on the Company.

- You are responsible for your actions.

Anything you post that can potentially and negatively affect Company's image will ultimately be your responsibility. We acknowledge your right to participate in the online Social Media space, however you should do so in proper and professional manner, exercising sound judgment and common sense and complying with the Company's Social Media Policy.

- Let us know about compliments and criticism.

If you come across compliments and constructive criticism about our Company or its products, you should forward them immediately to the concerned person.

- Let the authorized spokesperson respond to negative posts.

You may come across negative posts about the Company or its products, or if anyone trying to spark negative conversations. We need not react. Instead, pass on the links/posts to the concerned authority.

- Adhere to the POSH Policy.

MAFIL has a zero tolerance in any form of harassment or any other unacceptable behaviour. It is not acceptable for employees to harass or discriminate against their colleagues or members of the public on the grounds of race, caste, creeds, sex, marital status, age, origin, physical or intellectual impairment or any other preference including political or religious beliefs.

- Social Media should not affect your productivity

MAFIL recognizes Social Media as a communications tool to promote the company but Social Media should not become a distraction from or interfere with your normal work duties. Excessive or inappropriate use of Social Media may result in disciplinary action being taken including the removal of access to Social Media.

- Maintain Records

Remember that online statements can be held to the same legal standards as traditional media communications, therefore it is essential that records are not deleted from the Social Media monitoring tools that Company is using.

- When in doubt, do not post.

As online spokespeople, you must ensure that your posts are completely accurate and do not mislead, and that they do not reveal non-public information about the Company. Exercise

sound judgment and common sense, and if there is any doubt, DO NOT POST IT. In any circumstance in which you are uncertain about how to respond to a post, seek guidance from the concerned authority.

- If you make a 'mistake' online

Acknowledge the mistake immediately, apologize and be genuine and then alert the concerned authorities.

If you use a Company's online accounts in respect to social media, it is expected that you will duly hand over the account on your transfer or should you decide to leave the organization. The same applies for groups on LinkedIn, Facebook, Google + or other social platforms.

H) Guidelines for posting on Company's social media pages

The social networking website includes the following features for members of the company: forums, blogs, comments, profiles, videos, photos, and private message.

- These features provide the opportunity for members to interact with each other and discuss various subjects of interest. It is designed to engage in dynamic and knowledgeable discussions.
- To ensure that the same is a positive experience for everyone, it always expects you to respect other members and abide by the rules set out.
- While it expects you to express your views and opinions, if you violate any of the rules listed below or post content or comments that are inappropriate for the community area, Company has the right to remove the posts or content and it can also revoke the privileges to participate by blocking access to the site. Company also reserves the right to take down any post or content at its discretion and without any notice.
- The originating person will remain fully responsible for his/her posts.
- Company will have all rights to apply appropriate penalty against violators of these rules.

I) Reporting Negative activities:

Any attempts at hacking, disrupting or destroying the forum, or circumventing a suspension or expulsion may result in the immediate termination of that member's right to participate in MAFIL sites.

- If you feel that another user has violated this policy, you must report via the "Report Abuse" link.
- Please note that the views posted on the Company's sites reflect the views of individuals and not the views of the company itself.
- If you require clarification about aspects of this policy and how it applies to your own

circumstances, please contact the concerned authority.

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