



SOCIAL MEDIA POLICY

Version Number	Creation/ Revision Date	Prepared /Updated By	Reviewed By	Approved By	Change Description
1.0	01.06.2021	Compliance & Risk Committee	RiskPro	Group CEO	No Changes
1.1	17.11.2021	Compliance & Risk Committee	RiskPro	Group CEO	Minor changes and corrections
1.2	18.05.2022	Compliance & Risk Committee	RiskPro	Group CEO	Few minor corrections and added the acronyms section, added scope

TECHNO BRAIN SOCIAL MEDIA POLICY

1.0 POLICY STATEMENT

Techno Brain group with its wide geographic presence in other countries, immediately provides opportunity for diverse engagement through virtual platforms which includes but not limited to online conversations with employees, partners, vendors and/or suppliers. We recognize the vital importance of participating in these online conversations and we are committed to ensuring that we participate in online social media the right way.

Further, this policy provides guidance for employee use of social media, which should be broadly understood for purposes of this policy to include blogs, wikis, microblogs, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.

TBG encourages all of its associates to explore and engage in social media communities at a level at which they feel comfortable. Have fun, but be smart. The best advice is to approach online worlds in the same way we do the physical one – by using sound judgment and common sense, by adhering to the Company's values, and by following the Code of Conduct and all other applicable policies.

2.0 POLICY PURPOSE

This policy applies to professional use of social media on behalf of TBG as well as personal use of social media when referencing TBG management, to promote effective and open communication and to ensure that Code of Conduct is upheld at all times.

3.0 Scope

This Policy applies to all employees of the Techno Brain, as well as all its entities including independent contractors and persons acting on behalf of the Company.

4.0 GUIDING PRINCIPLES

The policy provides sound principles whilst engaging on the social media

Transparency in every social media engagement. TBG does not condone manipulating the social media flow by creating "fake" postings to mislead followers and control a conversation. Every Web site, "fan page", or other online destination that is ultimately controlled by the Company must make that fact known to users and must be authorized according to applicable internal protocols in order to track and monitor the Company's online presence.

Employees who have any clarifications regarding the execution of this policy should consult the management or HR representative accountable for execution of people policies. Policy documents should be read and embedded within a positive spirit and should be applied in an ethical and fair manner.

5.0 POLICY INTRODUCTION

- To educate on Do's and Don'ts of Social Media for Employees, consultants,

contractors, trainees and casual and agency staff.

- To update the employees about the consequences of violating TBG's social media policy.
- Employees need to know and adhere to TBG's Code of Conduct, Employee Handbook, and other company policies when using social media in reference to Techno Brain.
- Employees should be aware of the effect their actions may have on their images, as well as Techno Brain's image. This is with conscious awareness that online posted/published information by employees may be public information for a long time.
- Employees should be aware that TBG may observe content and information made available by employees through social media. Employees should use their best judgment in posting material that is neither inappropriate nor harmful to Techno Brain's employees, or customers.
- Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, slanderous, or that can create a hostile work environment.
- Employees are not to publish, post or release any information that is considered confidential or not public. If there are questions about what is considered confidential, employees should check with the Human Resources Department and/or their respective supervisor.
- Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees should refer these inquiries to authorized appointed staff.
- If employees find or encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of a supervisor.
- Employees should get approvals from authorized appointed staff before referring to or post images of current or former employees, members, vendors or suppliers. Additionally, employees should get approval to use a third party's copyrights, copyrighted material, trademarks, service marks or other intellectual property. This include but not limited to obtained a signed undertaking letter in line with Data protection compliance requirements.
- Social media use shouldn't interfere with employee's responsibilities. TBG's computer systems are to be used for business purposes only. Personal use of social media networks during working hours or personal blogging of online content is discouraged and could result in disciplinary action.
- Subject to applicable law, after-hours online activity that violates the Code of Conduct or any other company policy may subject an employee to disciplinary action or termination.
- It is highly recommended that employees keep TBG's related social media accounts separate from personal accounts, if practical.

6.0 POLICY APPLICATION & SCOPE

This policy is applicable to all employees' (interns, contractual, fixed term, permanent).

In order for the policy to be effective it is essential to help employees and managers understand the applicable rules and procedures, where they can be found and how they are to be used.

Ultimately it is the responsibility of the employees to ensure that this policy is carefully followed

This policy is intended to operate in conjunction with other complementary Company policies and with practices and business processes that collectively enhance the Company's good governance and best management practice objectives.

7.0 ROLES & RESPONSIBILITIES

7.1 Marketing

- a) Setting up a social media marketing yearly plan.
- b) Track all Company tags mentions ensuring relevance of postings and proper approvals are obtained as public domains does reflect on Company's image
- c) Brand Building through Effective communication
- d) Making customers aware about our presence on Social Media platforms.
- e) Engaging customers through various social media posts
- f) Engaging customers through various social media campaigns and contests
- g) Planning Cross-sell and Upsell.
- h) Relaying product information.
- i) Generating leads and building brand directly and through customer feedback.
- j) Crowd sourcing and product innovation before launching new products.
- k) Monitor Social Media Posts for violation of Social Media Policy for Employees and report it to Human Resources
- l) Usage of social media page to solicit and convey information about the training program, posting videos, presentations, interactive posters, podcasts, webinars and reference material to provide background information.
- m) Training on Social Media platform (settings, hash tags, social media site specific jargons, grammar and other attributes).
- n) Also, train staff on handling difficult discussions/conflicts.

7.2 Appointed management team

- a) Addressing customer complaints/issue on various platforms on real time basis.
- b) Setting up timelines for responses.
- c) Standard response template for standard concerns/ issues/complaints.
- d) Taking questions offline and addressing.
- e) Analyze followers' sentiments.
- f) Creating a response team to handle risk incident. Update the risk register if any risks identified.
- g) Monitoring social media sites for offensive or infringing posts.
- h) Measuring and mitigating loss of revenue, customers or market share because of information leak or reputation damage.

7.3 Country HR

- a) Making social media policy a part of the staff training or onboarding session
- b) Put up information about TBG's recruitment among other Company events on social media making it more visible to targeted audience upon approval.
- c) Identify cultural changes required to make social media program an on-going success.

7.4 Employee

- a) No employee should without taking approval from the appointed authority express views or opinion on behalf of TBG on social media
- b) No employees should engage in collusive behavior on any internet site or social media, with TBG's competitors or employees
- c) Adhere to the Code of Conduct and other applicable policies
- d) You are responsible for your actions. Anything you post that can potentially tarnish the Company's image will ultimately be your responsibility. We do encourage you to participate in the online social media space, but urge you to do so properly, exercising

- sound judgment and common sense.
- e) Be a “scout” for compliments and criticism. Even if you are not an official online spokesperson for the Company, you are one of our most vital assets for monitoring the social media landscape. If you come across positive or negative remarks about the Company that you believe are important, consider sharing them by forwarding them to tbgethics@technobraingroup.com. Let the subject matter experts respond to negative posts.
 - f) Be conscious when mixing your business and personal lives. Online, your personal and business personas are likely to intersect. The Company respects the free speech rights of all of its employees

7.5 Information Technology

- a) Define social media IT Plan.
- b) Incorporate analytics (includes Text Analytics) feature to track user interaction in social media and add value (proactive addressing of customer complaints, up sell/cross-sell) to the application functionality.
- c) Implementation of social media applications usability, security, performance, scalability and compatibility on multiple browsers/network/platforms.
- d) Implement network and application specific access controls.
- e) Inspect workflow management for responding to customer comments.

8.0 RELATED POLICIES/DOCUMENT/FORMS

- a) Employee Handbook
- b) Privacy policy on our Techno Brain Group Website.

9.0 MONITORING & POLICY REVIEW

TBG will monitor the implementation of this policy and ensure its effectiveness and that it meets legal requirements and reflects best practices.

HR commits to undertake formal policy review onct every two years or when business needs arise and to communicate the changes to managers and employees across the Company.

10.0 ACRONYMS

TBG	Techno Brain Group
HR	Human Resource
IT	Information Technology