

1. Introduction

The social media policy outlines protocols to be undertaken by Shriram Financial Services Private Limited employees for using social media and provide a imperative guidelines for employees in their personal use of social media or making public comments online.

The policy provides advice to Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies and all their employees on how to use social media and make public comments online, both in official capacity and as an individual citizen. The social media policy is developed and acts as a ready reckoner to assist employees on the use of social media and feel empowered to participate in groups, communities and public debates, while being mindful of their obligations and responsibilities under relevant legislation and within the social media guidelines laid by Shriram Financial Services Private Limited.

The policy applies to all, ie Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies and all their employees, including employees on contract or secondment to Shriram Financial Services Private Limited, employees on sabbatical or long leave, non-ongoing employees and contractors. Managers should ensure that all their employees are well aware of and understand the social media policy.

This policy should be read in conjunction with the Terms and Conditions on Shriram Financial Services Private Limited.

2. Policy

The Social Media Usage Policy applies to the use of social media, where employees have been authorised by Shriram Financial Services Private Limited to use social media as a communication tool on behalf of Shriram Financial Services Private Limited and for employees who work for Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies. This includes posting to an official page or a social media account (e.g., a departmental or a company Facebook account) participating as a departmental or a company representative on a third-party site (e.g., external blog, news comment, online forum) or utilizing internal online engagement tools and platforms.

This policy acts as a ready reckoner to employees in their personal use of social media and making public comments online. Employees are reminded of their responsibilities which apply at all times when using social media, both in their professional and personal capacities.

3. Official use of social media

The same high standards of conduct and behavior are expected of employees when participating online through social media. Online participation should reflect and uphold the values, integrity and reputation of the Shriram Financial Services Private Limited.

Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies along with agency partners, manages and authorizes the use of all official Shriram Financial Services Private Limited social media accounts. The Social Media Marketing Team and Communication Account Managers are responsible for engaging online with stakeholders and the general public in an official capacity. In some cases, authorized employees from other key business areas may be asked to assist Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies and the official social media marketing team with this work, and they will be trained accordingly.

Note, Shriram Financial Services Private Limited publishes guidance for agencies on managing the risks of cyber-bullying of its employees by members of the public. This publication provides helpful guidance for both managers and employees interacting with the public.

3.1 Key principles for official use of social media

All employees who are authorised to use or deploy social media as an official communication tool need to be familiar with, and apply the following key principles:

Administration – an official Shriram Financial Services Private Limited social media account must be administered by an authorised personnel member of Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies.

Approved activity – before commencing a social media initiative, it must be supported in writing by a business case, and approved by Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies.

Be accurate – make sure the information published is correct, even when using AI tools, and cite sources wherever appropriate. Refer to an appropriate business function where necessary and ensure content has appropriate compliance approvals.

Be impartial – avoid statements that advocates or criticizes policies of government or any political parties. Avoid conflicts of interest through endorsement or criticism of third-party providers, partners, products or services. Personal opinion must not be expressed.

Be courteous and respectful – be courteous and polite. Be sensitive to diversity. Avoid arguments and don't engage in personal attacks. Do not post obscene, defamatory, threatening, harassing, discriminatory or hateful content.

Consideration – Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies' employee actions on social media reflect on the function, and the department.

Consider intellectual property – respect copyrights. Always get permission to use words, images or materials from other sources. Any use of Shriram Financial Services Private Limited, its subsidiaries, and partner agencies' departmental branding and logos must be approved by Shriram Financial Services Private Limited.

Identity and authenticity – always use an authorised departmental identity (usually the official Shriram Financial Services Private Limited social media account/handle) and not a personal identity when posting to, or responding from Shriram Financial Services Private Limited’s social media accounts, on behalf of Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies.

Maintain confidentiality – only post publicly available information. Do not disclose or discuss official or classified information, make commitments or engage in activities on behalf of Shriram Financial Services Private Limited, unless authorised by the appropriate business area to do so.

Make a record – keep records of social media posts made in an official capacity. Classify and store information as set out in the Records Management Policy.

Protect and respect privacy – check the account privacy settings are appropriate for the scope of engagement. Protect privacy and personal information. Don’t share the private details of others. Do not disclose details of private conversations unless explicit consent from the relevant parties has been obtained.

Risk management – to ensure risk controls are effectively implemented and monitored, a Risk Management Plan must accompany the business case for all social media initiatives.

Think first – review content before publishing. All Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies’ employees are responsible for their own actions. Shriram Financial Services Private Limited, its subsidiaries, and partner agencies should consider the impact their activities could have on them and/or use common sense and best judgement. If unsure, first check with your manager or supervisor or department head

If in doubt, leave it out!

Comments made from Shriram Financial Services Private Limited social media accounts must not:

- endorse or make judgements about specific providers, products or services
- discuss circumstances surrounding Shriram Financial Services Private Limited’s specific relationship with, or management of, service partners or providers
- make personal judgements about how providers have implemented program guidelines
- represent or speak on behalf of another business area or function (i.e., don’t discuss other business without the prior consent and advice of the relevant business area).

If an online discussion involves specific individual circumstances or personal details, the moderator must ‘switch channel’ by directing members of the public to an alternative medium (e.g. telephone, direct message, email, letter, face-to-face) as appropriate.

4. Personal use of social media and making public comment online

Social Media Usage Policy

All employees have the same right to freedom of expression as other members of the community, subject to legitimate public interest.

Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies duly respect the right of employees to participate in political, advocacy, and community activities. In doing so, however, employees must behave in a way that does not seriously call into question their capacity to act apolitically and impartially in their work. Kindly ensure that the reputation of Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies is not at risk for comments made by its employees.

Employees should be aware that content published online and on social media is, or may become publicly available, even from personal social media accounts. We expect you to take reasonable steps to ensure that any social media use or public comment you make, including online, falls within the following parameters. Employees must ensure they:

- do not use their work email address to register personal social media accounts
- do not make comments that are unlawful, obscene, defamatory, threatening, harassing, discriminatory or hateful to, or about work, colleagues, peers or about Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies
- do not make comments that are, or could be perceived to be:
 - made on behalf of Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies, rather than an expression of a personal view
 - compromising your capacity to fulfil duties as an employee of Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies in an impartial and unbiased manner. This applies particularly where a comment is made about products, services, policies, key initiatives and programs
 - so harsh or extreme in their criticism on behalf of the Shriram Financial Services Private Limited of any government, a political representative of the state or nation from any political party, or their respective policies, that the employee is no longer able to work professionally, efficiently or impartially.
 - critical of departmental officers or key stakeholders in the department
 - critical of partners, clients or other stakeholders
 - a gratuitous personal attack that is linked to your employment and/or its terms
 - prejudicial to the integrity or good reputation of Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies
 - compromising public confidence in Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies
- make clear that any views expressed are their own, and not those of Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies. However, this will not necessarily protect them from breaching the code.
- When considering making personal comments, employees should reflect on the following questions:

- Could your comments cause Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies, its clients or other stakeholders to lose confidence in your ability to work in an impartial and professional manner?
- Are your comments reflective of how the community expects Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies operate and behave?
- Could your comments degrade or undermine the reputation of Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies?
- Are your comments lawful and devoid of any hate speech or crime? For example, do they comply with anti-discrimination/data protection, security, privacy and laws relating to defamation?
- Would you be comfortable if your manager read your comments?
- What if someone takes a screenshot of your comments and then circulates these around?

4.1 Staying safe

Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies has jointly published some general Do's and Don'ts when making public comment and engaging online. Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies' employees should always exercise discretion and judgement when making public comments or participating online. Generally, if in doubt, employees should seek advice from their manager or supervisor or <email> before taking any action

Do's

- Employees are allowed to be active on social media but it must be a respectable minimum at work and there should not be any engagement with it in the presence of customers
- Employees must seek necessary management and compliance approval before posting any content on its official social media handles
- The employees may mention the organization, but add a disclaimer that all the expressed opinions are their own
- Employees must familiarize themselves with the terms of service and privacy policy of all social media sites on which they participate
- Employees should understand both the social media usage policy and their rights as individuals.

Don'ts

- Employees are not allowed to publish materials that are classified, copyrighted and/or confidential
- Employees must not cite or refer to customers, clients, or partners without their consent
- Employees should reserve the right to comment on any mention of the organizations in the news, unless otherwise authorized to be a representative to act on behalf of

Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies

- Employees should not use official emails to create any personal accounts online and vice versa.

4.2 The Internet is forever

The content published on the internet can/will remain in public indefinitely. All forms of content posted or shared can be replicated and shared beyond the original intended audience who may express or share a different view and/or have different context to use it for an unintended purpose. For example, private messages or posts can be saved, screenshot, and made publicly viral – with very little potential for recourse. It is important to be aware that according to the terms and conditions of some third-party sites, the content published is the property of the site where it is posted and may be re-used in ways that were not intended.

Before posting to a social media site, it is important to understand the tool/platform and that users read the terms of service and user guides and look through existing content to get an idea of the posting etiquette and any cultural and behavioral rules or protocols associated with the social media platform.

Do not rely on a social media site's default or adjustable security settings as any guarantee of privacy. Even if employees do not identify themselves online, they could be identified as one by other people. Posts can be traced back to individual employees and they can be identified as an employee of any entity or subsidiary of Shriram Financial Services Private Limited even if they were posted anonymously or using a pseudonym.

5. Responsibilities

5.1 Access to social media at work

Personal use of social media sites (e.g. Facebook, Instagram and Twitter) is permitted; however, use of Shriram Financial Services Private Limited's assets and resources for private purposes must be undertaken in accordance with the social media regulation and framework.

5.2 Recordkeeping

Any information that is classified business or provides evidence of an occurring or already occurred business activity or decision is a public record. All Shriram Financial Services Private Limited, its entities, subsidiaries or partnering agencies/companies, its employees have an obligation to ensure that key decisions and events are recorded in a way that captures the important features of a discussion or decision, presents a faithful and accurate account and can be easily retrieved when needed. Social media platforms are fueled by third-party providers and should not be used to maintain official records. In managing content in social media accounts, every employee must keep records in accordance with the policy, ensuring all of the mentioned appropriate records are created and captured for all the

business functions, activities and transactions.

5.3 Privacy

Employees should not hand personal information about individuals to third-parties without their consent. The email address of your colleagues or stakeholders and other identifiable/classified information must be treated with discretion and care. Employees must not upload contact details or files from departmental (Outlook) contacts or shared folders when using or prompted by external social networking sites.

6. Non-Compliant/Policy Breach

A suspected breach of the Social Media Usage policy may be investigated to determine whether an employee has breached the policy. If an employee is found to have breached the Social Media Usage policy, the Secretary (or delegate) may determine that it is appropriate to impose sanctions or necessary action, but not limited to:

- termination of employment
- reduction in classification
- reassignment of duties
- reprimand
- initiate legal proceedings

7. More information

If you require assistance in interpreting any part of this policy, or would like to investigate the use of social media for your business area/ function or contact your manager/supervisor or compliance@shriramfs.com

8. Contact Information

Shriram Financial Services Private Limited, registered office at Rukmini Towers, 3rd Floor, #3/1, Platform Road, Bangalore -560020.

Social Media Usage Policy