

## **BAJAJ CAPITAL GROUP – SOCIAL MEDIA GUIDELINES**

### **Purpose**

We at Bajaj Capital Group (“Group”) recognize the importance of social media as a communication tool. We are committed to maintaining a good relationship with our employees, clients, principal companies, suppliers, vendors and the rest of the outside world.

*The term “Group” includes the flagship Company Bajaj Capital Limited and other group company(ies)/affiliates/sister concerns, within the Group, which are currently in existence and the Company(ies), which shall come into existence in future. The term “Company” (appearing in this policy) includes the respective Company within the Group in existence and which may come into existence in future.*

The way the public view us is vital to promoting business, gaining new business, recruiting and retaining quality employees, and marketing our products and services. To that end, employees may use social media, such as participating in a blog, chat room or online social network, for approved business reasons during working hours only. When doing so, this policy applies.

Some employees also maintain or participate in personal blogs, personal websites, bulletin boards, or other interactive web media, including LinkedIn, Facebook, MySpace, YouTube, Twitter etc., (herein collectively referred to as “social media platforms”).

Employees of the Group may elect to post information about the respective Company(s)/Group, its business, its products and services, the workplace etc. When doing so, this policy also applies.

All employees of the Group should understand there is a legal responsibility involved with using social media platforms. Though employees are free to post their own personal views on social media platforms, employees should know that some of their social media use may lead to irreparable harm to the Company/Group, its employees or other third parties, or may violate certain Company/Group policies and standards. Moreover, use of these sites may violate the rights of others when untrue, defamatory or legally protected information is posted. This policy is intended to balance the Company’s/Group’s duties and legitimate business objectives with its employees’ rights and responsibilities. The intent is not to interfere with an employee’s protected rights, which the Company/Group understands may, include, engaging in certain social media postings related to working terms and conditions.

However, these new ways of communication are changing the way we talk to each other and even to our

clients/investors, target audiences. Employees should also keep in mind that once information appears online, it can become part of a permanent record, even if the author later “deletes” it. Everything written on the Web can be traced back to its author, often very easily. In order to avoid any problems or misunderstandings, we have come up with a few guidelines to provide helpful and practical advice for you when operating on the internet/social media platforms, as an identifiable employee of the Bajaj Capital Group and its brands. With this in mind, follow these general guidelines:

- ✓ First, please familiarize yourself with and follow the Group Code of Conduct, policies etc., which are issued, from time to time.
- ✓ Unless you are one of the authorized persons to create account in the name of the Company/Group and/or its brands, you are strictly advised not to (directly or indirectly) create any account on any social media platforms in the name of the Company/Group and/or its brands. Further, you are not authorized in any manner whatsoever to create fake accounts, profile etc., in the name of the Company/Group and/or its brands.
- ✓ Unless you are one of the authorized persons, you are not allowed to post, upload etc., any information about the Company/Group and/or its brands, on any social media platforms.
- ✓ **Disclose your affiliation:** When you discuss about the Company/Group or its brand related matters on the internet/social media platforms, you must **identify yourself** with your name and, when relevant, your role in the Company and/or the Group. Only very few people in our Company and/or the Group are official spokesperson for the Company and/or the Group or its brands. So if you are not one of them you must make clear that you are speaking for yourself and not for the Company and/or the Group. You can use a **Disclaimer** like "**The postings on this site/social media platforms are my own and do not necessarily represent the position, strategy or opinions of the Company and/or the Group and its brands**". Please always **write in the first person** and don't use your official e-mail address for private communications. And please consider that even anonymous postings on Wikipedia, social networking sites etc., can be traced back to the Company.
- ✓ You are **personally responsible** for the content you publish on blogs, wikis, social networking sites/platforms or any other form of user-

generated media. Please remember that the internet never forgets. This means everything you publish, will be visible to the world for a very, very long time. **Personal Information:** Be careful about what personal information you share online. Be cautious when mixing your business and personal life.

- ✓ **Act responsibly and ethically:** When participating in online communities related to the Company's/Group business, do not misrepresent yourself. It is never acceptable to use aliases or otherwise deceive people.
- ✓ **Respect diversity:** Avoid communications that are defamatory or harassing, or remarks that would contribute to a hostile work environment (racial, sexual, religious, etc.) as well as any behavior not in agreement/line with the Company's/Groups general corporate policies or core values.
- ✓ **Common sense** is a huge factor here. If you are about to publish something that makes you even the slightest bit uncomfortable, please review before posting. If you are still unsure and it is related to the Company and/or the Group and its brands, talk to your Compliance Department.
- ✓ **Be professional and exercise good judgment:** When you identify yourself as an employee of the Company within a social network platform, you are connected to other employees, clients, and potential clients. Communicate online with **respect** for others. Remember that information shared via social media is generally public information that could easily be viewed by our employees, principal companies, clients, suppliers and the outside world. Exercise caution with regard to exaggeration, colorful language, guesswork, obscenity, copyrighted materials, legal conclusions, and derogatory remarks or characterizations in any way related to the Company, its products, services, clients, suppliers, employees, principal companies.
- ✓ Just because information is on the internal network (like the circulars, knowledge café, wealthmaker etc), it is not okay to let the rest of the world know about it. If an item features the sentence "**for internal use only**", "**private and confidential**" then that is exactly what it means and it is absolutely not meant to be forwarded to anyone who is not employed by the Company and/or Group. No exceptions allowed and/or accepted.
- ✓ Messages from our Board of Directors, CEO to all employees are not meant for the media. If we as a Company we wanted a newspaper to know how our Board and/or CEO sees the future of our Group the PR department would call them up and tell them.
- ✓ It is perfectly fine to talk about your work and have a dialogue with the community, but it is not okay to talk about any project, internal works, matters etc., before its official launch. If you have signed a **confidentiality agreement with the Company**, you are expected to follow it. If the judgment call is tough on secrets or other issues discussed, please ask the Compliance Department before you publish or forward. **Please act responsibly with the information you are entrusted with.**
- ✓ **Do not comment** on work-related matters unless you are an official spokesperson, and have the Compliance approval to do so. In addition, talking about company's strategies, revenues, future products, principal companies, pricing decisions, financial results or similar matters will get you, the company or both into serious trouble. Stay away from discussing the above topics and predictions of future performance, returns, etc., at all costs.
- ✓ **Company Trademarks:** Never use the Company's logo, trademark or proprietary graphics or photographs of the Company, Company's products and services for non-business related purposes without the approval of the Compliance Department.
- ✓ **Images:** Do not post images of the inside of Company facilities without expressed written approval from the Compliance Department. Do not post images of any Company property, including (but not limited to) furniture & fixture without the express written permission from Compliance Department.
- ✓ **Respect your audience.** Don't use ethnic slurs, personal insults, obscenity, or engage in any conduct that would not be acceptable in the Company's and/or the Group's workplace. You should also show proper consideration for others privacy and for topics that may be considered objectionable or inflammatory (like religion or politics). If you are in a virtual world as an Bajaj Capital Group representative, please behave accordingly. We all appreciate respect.
- ✓ Think about **consequences.** Imagine you are sitting in a sales meeting and your client brings

out a printout of a colleague's post that states that the product you were about to sell "is a misfit". Talk about a tough pitch. So, please remember:- Using your public voice to trash or embarrass your employer, your clients, your co-workers, principal companies, government departments or even yourself is not okay - and not professional. Never share information about the Company, your co-workers, our suppliers or clients, or our competition that could be considered as harassing, threatening, libelous, or defamatory in any way. Do not disclose contact or personal information of other co-employees without their prior permission.

- ✓ **Employment References:** All requests for employment recommendations or references should be handled in accordance with the standard HR practice for handling such requests. Do not solicit recommendations in any form whatsoever from other employees. Do not provide employment recommendations or references unless authorized to do so.
- ✓ Have you posted something that just wasn't true? **Be the first to respond to your own mistake.** In a blog, if you choose to modify an earlier post, make it clear that you have done so.
- ✓ Please respect **copyright**. If it is not yours, don't use it. It is very simple. It is that person's (who owns the copyright) choice to share his or her material with the world, not yours. Before posting someone else's work, please check with the owner first.
- ✓ Don't cite or reference clients, principal companies, vendors or suppliers, without their approval. When you do make a **reference**, where possible, link back to the source.
- ✓ Do not claim authorship to something that is not yours. If you are using another party's content, be sure they are credited for it in your post (giving credit is not the same having permission to use a third party's content. Giving credit does not absolve liability under applicable copyright law).
- ✓ Be aware that others will **associate you with your employer** when you identify yourself as such. Please ensure that your Facebook, LinkedIn, Xing or MySpace profile and related content is consistent with how you wish to present yourself with clients, colleagues and/or the target audience.
- ✓ Even if you act with the best intentions, you must remember that anything you put out there about the Company and/or the Group can potentially harm the Company and/or the Group. This goes for all **internal media** as well, like the intranet or any newsletters you send out. As soon as you act on the company's behalf by distributing information, you are upholding the company's image. Please act responsibly. If in doubt, please contact the Compliance Department before you hit the send button.
- ✓ **Negative posts:** Do not respond on the Company's/Group behalf to negative posts about the Company/Group, its products, services or employees. Instead, inform the Compliance Department immediately.
- ✓ **Team Members** who are not on the rolls of the Company should not speak on behalf of the Company. Further, employees who are no longer associated with the Company should not speak about the Company on any social media platform.
- ✓ **Monitoring:** The Company reserves the right to monitor employee use of social media that uses Company assets; *e.g.*, Company work computer, as well as the right to monitor comments or discussions about the Company, its employees, clients, principal companies, suppliers and the industry, including products, services and competitors, posted online by anyone, including employees and non-employees, whether posted within or outside the workplace. Therefore, employees should not maintain an expectation of privacy with respect to use of social media that uses Company assets or with respect to public, online communications involving the Company, its employees, client, principal companies, suppliers, and the industry.
- ✓ And finally. With all the blogging and interacting, **DON'T FORGET YOUR DAILY WORK.** Use of social media for non-Company business should not be conducted on Company time. Limit your personal use of social media to non-working time, such as breaks and lunch periods. Be careful not to let personal social media use interfere with your job performance or the performance of others.
- ✓ **Disciplinary Action:** Employees are responsible for adhering to the aforementioned social media guidelines. Failure to comply with the guidelines or on-line activity that otherwise cause harm to the Company/Group may be subject to disciplinary and legal action (as

permitted under law) including termination of employment.

- ✓ The above guidelines are subject to modification/alteration at the sole discretion of the Company/Group, from time to time, without any prior notice.

**Important Notes**

*In the event of breach/non-compliance of any of the above guidelines and/or the guidelines which may be modified/altere d (at the sole discretion of the Company/Group) from time to time, the Company will not defend you in any legal actions based on your commentary on any blog or other social media platform under any circumstances, whether you are sued by another company employee, a client, a supplier or someone, who is not affiliated with the Company/Group.*

*The Company/Group is committed to ensuring that we participate in social media in the right way. 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 /Group's core values and all applicable Company/Group policies. If you find yourself wondering if you can talk about something you learned at work – don't. For situations in which you are uncertain about how to respond, or for additional questions regarding the social media policy, contact the Compliance Department.*

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