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## Scope

The AM/NS India Social Media Policy applies to all the AM/NS India employees, employees of subsidiaries or any of the AM/NS India companies and, assigned workers, as well as to third parties performing services on behalf of AM/NS India Companies (herein after collectively referred to as 'You')

For employees, compliance with this policy is an expectation of employment. For assigned workers and third parties, compliance with this policy is a condition of access to the AM/NS India companies' resources, and of being permitted to perform services for AM/NS India Companies.

## **Purpose**

AM/NS India recognizes that Social Media tools, such as Blogs, Micro-Blogs, Online Forums, Content Sharing Websites and other digital channels, established for online interactions and connection are increasingly being used to:

- Keep in touch with the extended global network of family & friends
- Share personal opinions and participate in online interactions as individuals

The purpose of this policy is

- Encourage AM/NS India emloyees and our stakeholders to have an open exchange of ideas in the collaborative interest of the company
- Promote AM/NS India to colleagues, customers, media and the other AM/NS India stakeholders
- Utilize the opportunities provided by social media services to protect & nourish AM/NS India's brand image, marketing and communication capabilities.

While leveraging the benefits of Social Media and the opportunities it presents, the AM/NS India through this policy would also like to address the concerns of inappropriate usage / misuse of such media and provide referential guidelines for ethical and appropriate usage in an individual's professional as well as personal capacity.

## **Provisions**

Some of the broad principles to be kept in mind while participating in Social Media are as follows

a. Keep in mind the broader interests of AM/NS India, and not participate in social media channels which could conflict with the same.

- b. While using Social Media, AM/NS India and stakeholders shall seek to be aware of and abide by the terms of usage of the social media channels, all applicable laws and all AM/NS India policies, including but not limited to the AM/NS India Media Policy, IT Security Policy, PR Policy/Crisis Management Policy or any other relevant policy that one may be bound to, by nature of their employment with AM/NS India.
- c. These laws include, but are not exclusive to laws that govern usage of information gathered over the Internet, relevant accessibility and usability laws, regulations that govern the use of the Internet for minors and children, relevant financial disclosure regulations, copyright laws, fair use, creative commons policies and others.
- d. Issues arising out of individual participation in social media, shall be the responsibility of the participant and AM/NS India shall not be held liable in case of any adverse repercussions to the participant arising from the same.
- e. Individual participants in social media shall not use AM/NS India branding or assets logos, trademarks, visual identity, AM/NS India group locations & assets on their blog, profile or group page. Only AM/NS India owned blogs, company profiles, and AM/NS India-administered groups may use the AM/NS India brand identity.

# Participation in Social Media & Guidelines

There are two kinds of participations in Social Media – Company Sponsored and Individual. The following is an explanation of these two types of participation and guidelines applicable

#### AM/NS India Sponsored Participation

AM/NS India 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 channels like the companies Facebook page, Twitter handle, LinkedIn page, YouTube channel etc

#### a. Business Handles:

Handles for business must be created in consultation with the Corporate Communications and Brand Team. Business handles must be created as per the following guidelines and circumstances

- There must be a need to create a business identity separate from the corporate handle
- There are sufficient stories and content churn from within the business to sustain a long term social media presence
- There is a dedicated team/agency for the purpose of driving, populating and monitoring social media content
- o Investments are set aside for creating a sizable social media community
- 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 of AM/NS India
- Focus must be on representing the business as a whole on Social Media rather than opening handles specific to SBUs or individual assets or geography-wise.

#### b. Who is Authorized:

AM/NS India Sponsored Participation, shall be executed and managed by Authorized Group/ Individual Company Social Media Managers

## c. How are they Authorized

The authorization process would be done on an assigned role basis and will be linked to the annual marketing/ business plan process.

Type of participation	Authorised by	Remarks
External Social Media for Corporate	Company CEO/ Head – Corporate Branding and Communications	Any content hosted through AM/NS India sponsored participation shall be subjected to a content review and approval process by Corporate Branding and Communications Department.
External Social Media for Marketing	Company CEO / Marketing Head	Any content hosted through AM/NS India Company sponsored participation shall be subjected to a content review and approval process by Company Marketing Head

## d. Training of employees

- i. Based on specific business purpose, the businesses may nominate employees to participate in social media on behalf of their Company.
- ii. Nominated employees shall be trained to comply with all applicable laws and corporate policies while using social media.
- iii. Nominated employees will also be exposed to the Standard Operating procedures and best practices in Social Media.
- iv. The authorized/nominated person must take into consideration the best practices shared in Annexure I.

#### **Individual Participation**

Individual participation applies to those instances in which AM/NS India employees participate in their personal capacity across Social Media Platforms. These are not sponsored by the company. Examples of these would be Facebook profiles of individuals, twitter handles, linkedin profile etc.

The AM/NS India group encourages employees to use the Internet in their personal time, for social media. This is important for the pursuit of knowledge, to engage in meaningful conversation and to build mutually beneficial business relationships for an individual's benefit as well as in the larger interests of the company.

While encouraging participation, AM/NS India also provides certain guidelines (Best Practices in Annexure I) to protect the individual's and Company's interests, while participating in social media.

Company branding or company assets in the form of logos, trademarks, visual identity, images of office premises & AM/NS India group assets, should not be used on these blogs, pages, profiles and the like.

We encourage you, in your individual capacity, to be a 'scout for sentiment and critical issues for the organization. We also ask you to be responsible for your actions, to be conscious about mixing your personal and business lives, and keep in mind at all the times the global audience of social media.

# Monitoring, Reporting and Disciplinary Actions

#### Monitoring

- a. AM/NS India reserves the right to monitor comments or discussions about the Company, its employees and clients and the industry, including products and competitors, posted by anyone, which includes employees and non-employees, on the external and internal social media platforms
- b. AM/NS India reserves the right to seek clarification on any content posted in social media by an employee at any point of time and also block / delete content that conflicts with AM/NS India Values and/or violates the AM/NS India's Social Media Policy.

#### Reporting

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

#### **Disciplinary Action**

a. AM/NS India will thoroughly investigate and respond to all reports of any violations of the Social Media Policy and other related policies.

b. Violations of the AM/NS India Social Media Policy will be treated seriously and may lead to appropriate disciplinary action ranging from a warning to dismissal or termination of

- employment. The Disciplinary action will be determined based on the nature and factors of violation and will be facilitated by HR as per the Disciplinary action procedures of each country.
- c. Associates will be protected from any intimidation, victimisation 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 an associate for bringing a complaint will be treated as a disciplinary offence.

# **Annexure 1**

# **Best Practices**

We have listed below, some of the common best practices by experienced global practitioners of Social Media. They have been listed here to further our understanding & enhance our social media interactions, in our individual capacity.

#### a. Preparation and Training

- i. If you are new to social media, we encourage you to observe the behaviour of experienced users for a reasonable period of time before active usage.
- ii. If possible, undergo formal training on social media usage; if not, access content available on the Internet.
- iii. If you are inclined to start a blog, we encourage you to spend substantial time and effort researching the subject of your blog. It is easy to set up a blog; it is very difficult to sustain one.

#### b. Decorum

- i. Use polite, lucid and conversational language, whether you are blogging or posting casual commentary.
- ii. Always acknowledge your sources; if possible, give a working hyperlink to the content referred to.
- iii. Use extreme care when communicating with minors or on social media services intended to be read by minors.
- iv. Always moderate others' commentary on your blog or profile page; feel free to delete comments which are irrelevant and misguided.
- v. Nurture relationships with people you value: on the Internet, you are as good as your relationships.
- vi. Don't start arguments or fuel them. When you see any information that is not accurate, is misleading and / or out of context and untrue, made about AM/NS India by media, analyst, or by other bloggers, you may certainly use your writing to join someone else's, to point that out. Always do so with respect, stick to the facts and identify your affiliation to the company. Also, if you speak about a competitor, you must also make sure that what you say is factual and that it does not disparage the competitor. Avoid

unnecessary or unproductive arguments.

vii. Be the first to respond to your own mistakes. If you make an error, admit it and correct it quickly. If you choose to modify an earlier post, make it clear that you have done so.

## c. Use your best judgement

Remember that there are always consequences to what you publish. If you're about to publish something that makes you even the slightest bit uncomfortable, review the suggestions above and think about why that is. If you're still unsure, and it is related to AM/NS India or AM/NS India's business, feel free to discuss it with your manager. Ultimately, however, you have the sole responsibility for what you post or publish in any form of social media.

#### d. Company enquiries

Should any individual (members of the press, prospective customer, aspirant, or investor) attempt to contact you on your capacity as an AM/NS India employee, direct them to the right authorised contacts or your supervisor. Keep yourself updated of the right official contact points for Media, Employment, Investor Relations, and Sales.

### e. Protect clients, business partners and suppliers

Clients, business partners and suppliers should not be cited or obviously referenced without their approval. Externally, never identify a client, partner or supplier by name without permission and never discuss confidential details of a client engagement. It is acceptable to discuss general details about kind of projects and to use non-identifying pseudonyms for a client (e.g. Client 123) so long as the information provided does not make it easy for someone to identify the client or violate any non-disclosure or intellectual property agreements that may be in place with the client.

#### f. Respect your audience and your co-workers

Remember that AM/NS India is a global organisation whose employees and clients reflect a diverse set of customs, values and points of view. Don't be afraid to be yourself, but do so respectfully. This includes not only the obvious (no ethnic slurs, personal insults, obscenity, etc.) but also proper consideration of privacy and topics that may be considered objectionable and inflammatory such as politics and religion. For example, if your writing is hosted on company-owned property, avoid these topics and focus on subjects that are business-related. If your writing is self-hosted, use your best judgement and be sure to make it clear that the views and opinions expressed are yours alone and do not reflect the official view of AM/NS India.

## g. Add Value

The AM/NS India brand is best represented by its employees and everything you publish reflects upon it. Blogs and social networks that are hosted on company-owned domains should be used in a way that adds value to our business. You are adding value if what you publish helps you, your co-workers, our clients, or our partners to do their jobs and solve problems; if it helps to improve knowledge or skills; if it contributes directly or indirectly to the improvement of our projects, processes and policies; if it builds a sense of community,

or if it helps to promote AM/NS India Values.

#### h. Ownership and Responsibility

- i. You are personally responsible for what you write. You can be held personally liable for commentary that is considered defamatory, obscene, proprietary or libellous by any offended party, not just AM/NS India.
- ii. You will be held accountable for the information you share in online activities. Be careful what you share, publish, post, or otherwise disclose. You are personally responsible for what you share and should remember that anything you post may be public for an indefinite period of time (even if you attempt to modify or delete). Try to ensure your online communications reflect the principles and values of AM/NS India.
- iii. Your character and integrity are your most valuable assets: safeguard them always be truthful and transparent.
- iv. Always be careful with what you share or embed on your blog or profile page: shared or embedded content is as good as your own, and will be judged as your contribution. Ensure that shared or embedded content is consistent with your values, as well as AM/NS India's.
- v. Be aware of copyright laws; be vigilant about infringement of your own copyright.
- vi. Always respect the privacy of your colleagues, friends, family and other individuals / entities you are in touch with.
- vii. Use trusted third party services; take efforts to ascertain the reputation of your software and service provider.
- viii. Lastly, watch your reputation like a hawk. It is difficult to retrieve a damaged reputation.

## i. Adherence to AM/NS India Policies, other terms and conditions

- i. Be fully aware of the AM/NS India policies; consciously adhere to it at all times, irrespective of whether you are blogging for personal interest or on behalf of the Company. Be fully aware at all times that any violation will reflect poorly on the Company, as well as you.
- ii. Read the Terms and Conditions and / or User Protocols of the social media channels. Adhere to them strictly.
- iii. Always respect the specific boundaries, terms and conditions, and community guidelines set by each network
- iv. Just as you would not violate the AM/NS India Policies or your own values, expect the same of other users. Never ask anyone to misrepresent, mislead, deceive or defame other users for your or AM/NS India' benefit.

#### i. Disclosure

- i. Disclose your relationship with AM/NS India if relevant to the subject of your conversation\*. Recommended phrase: "Disclosure: The author is an employee of AM/NS India. The opinions expressed herein are my own and do not reflect those of the Company". This may not be required in internal networks and communities.
- ii. While engaging in conversations on subjects with specific reference to AM/NS India and AM/NS India business interests, disclose your relationship appropriately. For example, on Twitter, you could use a hashtag "#employee" or phrase "Disclosure: AM/NS India Employee" OR "Tweets are my own, not AM/NS India's" along with your tweet.

- iii. While commenting on blogs / websites / communities / discussion forums with a specific reference to AM/NS India, always disclose your relationship with the Company and leave a working email ID and telephone number.
- iv. Comply with all laws and regulations regarding disclosure of identity.

#### k. AM/NS India Information

- i. Do not discuss AM/NS India's proprietary business information publicly: these include clients, financial information, trade secrets, strategy, offerings / services, employees, policies, procedures, proprietary methodologies, or work-related communication, irrespective of whether these have been marked as Confidential or not. Any violation could attract disciplinary action.
- ii. Do not discuss organisational announcements and forward looking statements or deals under discussion / negotiation and NOT publicly announced.
- iii. Do not discuss or disclose internal operations of AM/NS India, internal mailers / vidoes or information on the company intranet.
- iv. Do not post unverified and inaccurate information, even if it is of a positive nature, on any social media channel, about AM/NS India or any other individual or business entity. This includes contribution to Wikis such as Wikipedia.
- Don't let your social media activities impact your work
   Make sure that your online activities do not interfere with your job or commitments to customer.

#### m. Anonymous activity

- i. Never set up an anonymous blog or a fake user profile. Most social media channels blacklist anonymous users and fake users: it is as good as losing your identity. Be aware that you could face legal action in many countries for such activity.
- ii. Do not post anonymous comments on news and media Web sites, blogs, discussion forums or profile pages. This is an unethical practice: it reflects poorly on your integrity as well as that of the Company. Be aware that you can always be traced by an appropriate authority, and legal action taken against you.

#### n. Personal Integrity, privacy, security and relationships

- i. Ensure your handle has a strong password. Never share the password to non-authorised people or make them admins without proper authorisation.
- ii. Take all precautions to avoid hacking of the personal as well as AM/NS India accounts on digital platforms.
- iii. Never accept friendship or networking requests from people you do not know, or are of doubtful character. You are as good as your relationships.
- iv. Never endorse people you don't know well enough to endorse. Never request someone to write a fake endorsement or something they do not believe. This is especially true on professional networking Web sites such as LinkedIn, Xing, and others.
- v. Never use off-topic comments promoting yourself or AM/NS India.
- vi. Never use services or technologies for mass-posting comments.

- vii. Never give out any personal information that could be used against you, such as private phone numbers, bank accounts, employee numbers, user names or passwords. Use other secure means of communication to communicate these.
- viii. Never knowingly communicate information that is untrue or deceptive. Communications shall be based on current, accurate, complete and relevant data available on <a href="www.amnsindia.in">www.amnsindia.in</a>. AM/NS India shall take reasonable steps to assure the validity of information communicated via any channel but it is your responsibility to assure accuracy in the first instance. Anecdotes and opinions shall be identified as such.
- ix. Your character and integrity are your most valuable assets: safeguard them do not post anything that you do not want your family or your supervisor / peers to read.