
SOCIAL MEDIA POLICY

**MUTHOOTTU MINI FINANCIERS
LIMITED**

**Approved by the Board of Directors in
their Meeting held on 13/02/2023**

1. Introduction:

Social media comprises of a set of internet technologies that enable people to easily share content online, including and not limited to, social networks, blogs video, photos, wikis, online reviews, online check-ins and much more. There are hundreds of social media channels, networks and tools and they are growing day by day. Examples of social media channels are, Facebook, WhatsApp, Twitter, LinkedIn and so on. Social Media platforms allow users to have conversations, share information, express ideas and create web content.

With the rise of new media and next generation communication channels and tools, the ways in which MMFL and its employees communicate internally and externally continue to evolve. While this creates new opportunities for communication and collaboration, it creates new responsibilities too. As for MMFL, it creates new levels of regulatory and reputation risks as well as it affects productivity of employees in the workplace.

The objectives of MMFL to be in Social Media Platforms are:

- i. To keep stakeholders informed about ongoing developments and events about MMFL and its products and services.
- ii. To receive and respond the feedback/opinions from the customers/employees related to MMFL products and services.

2. Definitions:

- a. MMFL – Muthoottu Mini Financiers Limited
- b. Social Media Platforms/Channels means official account/page of MMFL on various social media
- c. MMFL personnel mean all staff and board members of MMFL
- d. Social media means any sites/apps/tools where different type of content (like text, image or video) is shared to public or private groups/persons.
- e. Policy means all individuals working at all grades (PAN India) including management, directors, employees, consultants, contractors, trainees, part time and agency staff.

3. Objective:

Objective of this Social Media Policy is to provide guidelines on the use of social media channels/platforms/tools of MMFL by its Personnel, which includes

- a. Guiding MMFL personnel, customers, stakeholders, general public, etc on posting contents, comments, feedback, suggestions or concerns on MMFL social media channels
- b. Providing a framework of Do's and Don'ts on MMFL social media channels
- c. Guidance on rules, regulations, compliance and legal requirements of Social Media Usage
- d. Provide guidelines on online conversations engaged by MMFL personnel

The guidelines set forth in this policy applies to all forms of social media including, but not limited to: blogs, Facebook, Twitter, Instagram, Wikipedia, LinkedIn or other wikis, Google + and other platforms as may arise. These guidelines also apply to any comments that MMFL staff may leave on others' social media channels including responses to tweets, Facebook posts, blog comments and postings on message boards/forums. MMFL staff are advised to use proper writing style and professional discourse as far as possible while conversing on social media on behalf of MMFL.

All social media accounts, blogs, Web pages and related content carrying the MMFL brand identity are and will be owned and licensed by MMFL as appropriate. If Bank is referenced in any media by MMFL's staff, all social media guidelines related to MMFL's employees will apply.

All staff are expected to comply with this policy at all times to protect the privacy, confidentiality and interests of the Company and its services, employees, partners, customers and competitors.

4. MMFL's Social Media Policy:

Guidelines for employees

The Company has a separate Team for managing Company's social media platforms. Except for the team, no employee is allowed to post any content, express any view or opinions on purporting to be on behalf of the Company in the official capacity of his position in the Company, on any internet site or social media about the working of Company or the business of Company or generally about Company or any of its officials without prior written approval of the Company.

No employee of the Company should create or promote any group, community or webpage which will use the name or logo/identifier of Company or become a member of any unofficial such group/ community or web page.

If the employee comes across any such unofficial/ spurious group or community, the same should be reported to the management so that the appropriate legal action

shall take against such employee to safeguard Company's interest.

No employee should post anything on any social media platform or websites, things that would damage the reputation of the Company or any of its employees.

No employee should express negative views or criticize Company Management, policies or strategies on social media platforms or websites.

No employees should engage in collusive behavior on any social media Platform, with Company's competitors or employees.

Any employee of the Company found creating alternate ids/fake ids and escalating grievance issues in the public domain by tagging the Company's higher authorities will be treated as the violation of the Social Media policy for employees and may be meted out strict action as deemed fit by the competent authority.

No employee should post or forward or discuss views which are indecent, derogatory, abusive, immoral, unparliamentarily and vulgar, without knowing full fact and background of any matter or against the organization/ Company/ any individual or against the Government or any Constitutional Body. The post/ forward/ comment, must also not be provoking/ instigating people to commit any act(s) which do not fall under proper behavior/ conduct norms/ guidelines or are illegal or criminal in nature.

Always consider others privacy and avoid discussing topics that might be inflammatory, controversial, e.g. politics and religion.

Under no circumstances whatsoever, is the use of pseudonyms or false names advisable.

Do not canvass for any donation, lottery or third party marketing / business promotional activities / affairs on any interest site or social media.

Do not respond to Customer grievances on social media forums. If any employee has any knowledge of a specific customer grievance, please share with the Management via email/internal communication but certainly not on public (social media/ WhatsApp) forums.

If an employee has any grievances, it should not be raised via social media channels.

Posting rumours, internal and confidential information can lead to legal action against the employee.

No employee shall use the Company name or identity to monetize personalized channels or publish content if any, without the prior written consent of the Company.

4.1 Contents

4.1.1 All contents posted on Social Media channels do not imply any contractual obligation on the part of MMFL and these contents are meant to be indicative and informative in nature. For the most authentic/detailed information, please visit MMFL website <https://www.muthoottumini.com/> or visit your nearest MMFL Branch.

4.1.2 Sharing the contents posted on MMFL's Social Media channels in its original format only is permitted. However, no one has the right to use the same for monetary purpose, change, alter, modify, amend, revise, publish, translate, copy or otherwise distribute any part or content posted thereof, or link any other Social Media channels or any other website to this page.

4.1.3 MMFL reserves its right to change information, material, content posted on its Social Media channels/ Platforms as and when required without prior intimation to any person.

4.1.4 Refrain from the use of abusive, obscene, intimidating, discriminatory, defamatory, offensive, unpleasant, threatening, harassing, improper language that target specific individuals or groups while communicating with us / others on our page.

4.1.5 Refrain from post of any content which may violate any law or which may be against the public policy or which may infringe privacy rights of any person.

4.1.6 Refrain from posting any comments or posts that use discriminatory, defamatory, threatening, obscene, intimidating, discriminating, harassing, hateful, improper or un-parliamentary language, spam or violate any intellectual property rights, which may cause embarrassment to the Company or

may contain virus or are immaterial and unconnected to the topics or any matter that MMFL deems as inappropriate in any way.

4.1.7 Posts regarding selling of any third-party product and services, posts that are off-topic, posts that promote or oppose any political party, personal or political or religious campaigns, by any person shall be prohibited and blocked, without intimation, from making further posts on MMFL's Social Media platforms. The same is at the sole discretion of MMFL.

4.1.8 Individuals/ any entity making any such posts not conforming to this social media policy may be prohibited and blocked, without intimation, from making further posts on MMFL's Social Media platforms. The same is at the sole discretion of the MMFL.

4.1.9 The content available on the Social Media Platforms, including text, graphics, links or other items

- are on "as is," "as available" basis. No warranty of any kind, implied, express or statutory is given in conjunction with the information and material.

Do not share posts or upload links to chain mail, junk mail, cartoons, jokes or gossip on the Company's website or social media sites.

4.1.11 It is not possible for MMFL to fully monitor all comments/ posts on its Social Media channels but wherever it comes to the notice of MMFL that any comment/post is misleading, offensive, unlawful, infringes third party rights or in breach of these terms and conditions, then MMFL reserves its right to remove it from its Social Media channels.

4.2 Privacy

4.2.1 Take at most care to refrain from publishing any type of content which is not really intended to be published/released to the public domain/groups/channels/etc. Such information gets quickly and easily broadcasted to many groups/people/servers and is irreversible. Content posted in such social media platforms may reside on their servers or archives even after deletion. At most caution should be taken while posting content on social media.

4.2.2 Do not post personal, account sensitive information viz. card numbers, PIN, passwords, account numbers, phone numbers etc. MMFL doesn't undertake any liability for any financial and/ or other losses, identity/ information theft or any such issue faced by users on account of posting their sensitive/ personal information.

4.2.3 With the use of our Facebook, Twitter and other Social Media channels, visitor on social media also conform to the respective platform's Terms and Conditions and its prevailing Privacy Policy or any regulatory norms that have to

be adhered to.

4.3 Third Party Information

4.3.1 MMFL is not responsible for the content, privacy or security policies of any external websites or links.

4.3.2 MMFL neither takes any responsibility or liability for any third-party messages, views, uploads, content and opinions in the comments or posts, nor endorses their views. This is inclusive of the text, images, documents, audio and videos added, posted or linked by the users/ third parties.

4.3.3 MMFL does not take any responsibilities or provide warranties/guarantees/security regarding the accuracy, functionality and/or third party's software performance that may be utilised in connection with the social media page.

4.3.4 MMFL does not endorse the advertisements and any content or links provided by Social Media websites on MMFL's Social Media channels and MMFL will not be responsible for the same. For more detailed and accurate information on MMFL products/services refer the website: <https://www.muthoottumini.com>.

4.3.5 Observe utmost care and caution while acting upon/ commenting on the content posted by third party. MMFL shall in no way be liable for any loss/damages/ any legal action incurred by anyone by acting upon such contents.

4.4 Regulations, Legal and Compliance

4.4.1 Communications made via MMFL's Social Media channels will in no way constitute a legal or official notice to MMFL or any official or employee of MMFL for any purpose.

4.4.2 Any content that are posted on MMFL's Social Media channels shall be deemed and remain the property of MMFL. MMFL shall be free to use such content/ information, for any purpose without any legal or financial compensation or permission for such usage.

4.4.3 MMFL reserves its rights to initiate appropriate legal proceedings in the event of any breach/ violation of guidelines/ other terms and conditions as may be specified by MMFL from time to time.

4.4.4 Under no circumstances MMFL shall or any of our affiliates, employees or representatives, be liable to any direct or indirect, claims or damages whatsoever emanating from any mistakes, inaccuracies, or errors of content, personal injury or property damage, of any nature whatsoever, emanating from usage of Social Media platforms or entities purporting to represent MMFL. Specific acknowledgement by the user that MMFL shall not take any liability for content

or the offensive, defamatory, or illegal conduct of any third party and that the risk of damage or harm arising from the preceding entirely rests with the user. The foregoing limitation of liability shall apply to the fullest extent that's permitted by law in the applicable jurisdiction.

To the extent permitted by law applicable, social media user agrees to indemnify, defend and hold harmless, MMFL, its affiliates, officers, directors, employees, and agents, arising from and against any and all damages, claims, obligations, liabilities, losses, costs or debt, and expenses (including but not limited to lawyer's/attorney's fees) arising from:

- a. Use of and access of our page
- b. Violation of any of these Guidelines;
- c. Violation of any third party right, including without limitation any copyright, proprietary, or right to privacy; or
- d. All or any claim that content posted by customer caused damage to a third party. The indemnification obligation contained herein shall survive these Guidelines and use of our Social Media channels

4.4.5 Anyone with the intent to cause or knowing that he/ she is likely to cause wrongful loss or damage to the brand's image, to destroy or delete or alter any information residing on the Social Media platform or diminish its value or utility by any means, commits hack, shall be prosecuted under Information Technology Act, 2000 [As amended by Information Technology (Amendment) Act 2008], its subsequent amendments as well as any other statute prescribed by the concerned authorities.

Breach of terms of this Policy

Wherever breach of Policy is noticed and / or reported, it will be forwarded to the concerned Disciplinary Authority for the employee who breached, for appropriate action.

If the Disciplinary Authority has decided to initiate disciplinary action, it will be a "non- vigilance" case, unless financial / vital information is disclosed which may lead to financial loss to the Company or customer.

Where evidence of misuse and violation of this policy is found, the Company may initiate suitable action under the Law/ disciplinary actions / Service Regulations against the concerned employee as deem appropriate.

Deliberately breaching this policy is a serious matter and employees who do so will be subjected to strict disciplinary action under the relevant Service Regulations and may even lead to termination of the employment

Ignorance of the policy or its guidelines also cannot be allowed as an excuse to

breach the Social Media policy.

If any staff notices any violation of the Social media policy, he/ she should bring this to the notice of the Company/ management.

Violations of Social media policy can also tantamount to action/ prosecution (civil/ criminal) by external authorities under the Act or provisions of any other Act in force.

Where appropriate, the Company will involve the police or other law enforcement agencies in relation to breaches of this policy.

4.5 Applicability of Law

This Social Media Policy shall be governed and construed in accordance with the law of India and any dispute or claim that may arise shall be exclusively decided by a Court of competent jurisdiction located at Kochi only. MMFL logos are trademark and property of MMFL and use of any intellectual property of MMFL in any manner without prior written permission of the MMFL is strictly prohibited.

4.6 Monitoring and Review of Policy

The Marketing Department will be responsible for reviewing this policy at any point of time as felt necessary, to ensure that it meets legal requirements and reflects best practices.

In case of sudden changes in the social media or Companying industry, a meeting can be held to bring in the desired changes in the policy, on urgent basis.

Managing Director of the Company would be the competent authority to approve changes in the policy.

The Board will review and approve to The Social Media Policy annually or earlier in case of any interim changes required based on the guidelines issued by the Government / RBI / MMFL and proposes changes directions / guidelines. The Board resolution evidencing the approval will be retained.

The MMFL requests its customers, Stakeholders & General Public using its Social Media channels/ platforms to frequently check this page for any changes in Social Media Policy. It is presumed that any change in Social Media Policy shall constitute acceptance of such changes as continued use of MMFL's Social Media channels/ platforms.

AMENDMENT

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.

Responsibility for implementation of the policy

-The Chief Administrative Officer (CAO) has overall responsibility for the effective operation of this policy.

-The CAO is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimize risks to our operations.

-All staff are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All staff should ensure that they take the time to read and understand it.

Any breach of this policy should be reported to CAO.

-Questions regarding the content or application of this policy should be directed to CAO