

SOCIAL MEDIA POLICY

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DOCUMENT CONTROL

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ABSTRACT	This document details Policy and Guidelines on the use of various social media and instant messaging platforms by Invenio employees
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AUTHORISATION

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1. PURPOSE & OBJECTIVE

This policy provides guidance for participation in online social networking sites, interactive forums, blogs, wikis, chat rooms, podcasts, video aggregation platforms or any other kind of social media platforms.

Each Representative (as defined hereinbelow) of Invenio Business Solutions Pvt. Ltd. and LSI Consulting has the potential to affect Invenio's reputation and/or expose Invenio to business and legal risk. This social medial policy is developed and ratified as a way for Invenio to build personal responsibility and care when operating on the various social media platforms as an identifiable employee of Invenio.

The Policy the reference and understanding of everyone in Invenio. Any violation of this Policy could have consequences amounting up to termination in accordance with the relevant HR policy and applicable laws of the country.

2. DEFINITIONS

a. Social Media

Social Media shall mean and refer to any service, tool or platform that facilitates communication of any and all kinds over the internet; including but not limited to, Facebook, Twitter, WeChat, Instagram, WhatsApp, YouTube, various blogs and wikis.

b. Representative or You or Your

Representative or You or Your shall mean and refer to all employees, interns, contractors, agents, or any third party acting on Invenio's behalf.

3. SCOPE AND COVERAGE

a. Personal accounts

When creating Your own accounts, one decision You need to make is whether You will use it for personal, professional, or both types of content.

You may choose to have social media accounts that are entirely personal: no mention of Your employer, no sharing of Invenio's content, no connection between Your account and the Invenio brand. However, be mindful that currently, keeping personal and professional entirely separate isalmost impossible. Hence, as a Representative of Invenio, it is necessary that You keep in mind the Code of Business Ethics, and other relevant guidelines, as informed to You from time to time.

Employees should remember that any information that is shared online instantly becomes permanent and public. NEVER disclose or share any non-public, sensitive, or confidential information about Invenio such as the following (which is only indicative and not exhaustive):

- Do not share any information pertaining to the number of employees across verticals, subverticals, specific services, and countries
- Do not share any information pertaining to the number of customers across verticals, subverticals, specific services, and countries
- Do not share any information on number of projects or size of projects across verticals, horizontals, or geographies
- Do not reveal any pricing and fees details
- Do not share any customer details Name, size of deal, types of services, delivery model etc. should not be disclosed without obtaining consent of respective customers and Invenio
- Do not share any information on revenue segmentation and revenue growth by verticals, sub-verticals, specific services, and countries

All the above points hold for social media participation from any business unit / corporate function as well.

b. Professional accounts

As soon as You use a social media account or blog that links the content with Invenio, there are specific guidelines You must abide by:

You are welcome to declare Your role at Invenio in Your user biography (and update the same if You leave Invenio), but it should always be clear that the account is not a corporate channel but rather the voice of an individual. Upon declaring association with Invenio, anything posted should reflect Invenio's values and code of conduct.

Additionally, note that, for all purposes, any and all retweets or shares are endorsements (regardless of anything placed in an individual's bio), which means sharing content that constitutes an IPR infringement, defamation, disparagement or abuse or other similar criminal offences, will not be tolerated.

Many of You, in your roles with Invenio have had access to confidential information about Invenio and/or Invenio's clients. Protection of such information is part of Your contractual obligations. Thus, never share content that is client confidential or that which reveals confidential intellectual property of Invenio or its clients.

In addition to these guidelines, outlined below are basic principles that You should all be aware of.

4. BASIC PRINCIPLES

a. Think before You post

Make good judgement in sharing only public information and/or publicly available data, whether financial data or client's information. Do not share any information publicly, if You have any doubt about its confidentiality obligations.

In these days of shifting privacy policies and powerful search engine indexing, You can't always be sure what is being shared, viewed, or archived. Note that what You publish online will be public for a very long time. Your posts reflect You and would portray You, in the manner you present yourself, to friends, family, colleagues, and clients. If You are unsure whether certain content is appropriate to share online, then refrain.

Additionally, if you see or are made aware of anything shared related to Invenio, on any Social Media platform, immediately inform Marketing team.

b. Responsibility

You are personally responsible for Your words and actions, no matter where You are, even in the online world. Unless sanctioned by Invenio, the information You share is Your opinion and not Invenio's statement and a disclaimer such as "Views expressed on this profile/site/blog/post are my own and not those of Invenio". When you do discuss Invenio or Invenio related information online (which is not in violation of Your confidentiality obligations), be transparent by providing Your name and role with Invenio. Also remember that irrespective of any disclaimer placed in Your bio regarding the content being your own, it may not stop another user from raising a complaint against You/ Your activity and noting that you work for Invenio.

Do not answer any questions posed about Invenio on social media and let Invenio marketing teamtake care of it.

c. Conduct

Remember Your conduct in public and on Social Media impacts the brand of Invenio. You can help shape Invenio's reputation online. Use Your expert knowledge to enrich discussions, help solve problems, share the excitement about Invenio work environment, and promote learning and idea-sharing.

If You realize that You've made a mistake, try to correct it promptly. Additionally, although not an exhaustive list, ensure that You do not make derogatory remarks, bully, intimidate, harass other users, use insults, or post content that is hateful, slanderous, threatening, discriminating, or pornographic or in any manner violating applicable laws and policies.

For any posts made by You, in Your official capacity for Invenio, please ensure the following:

• Ensure that any collection, or usage of 'personal information' on Social Media follows the

applicable law, and Invenio's Data Protection and Privacy Policy

- As an official spokesperson, You must ensure that the information being shared is authentic and accurate and must not be deceptive and/or misleading
- Ensure that all information is approved

Further, usage of Social Media must not interfere with Your responsibilities at Invenio. Invenio provided systems and property must only be made use of for business purposes, i.e. Invenio provided computer system may be used for updating, sharing, or posting on Invenio's official Social Media presence only and not Your personal Social Media account(s).

d. Confidentiality

Invenio is a General Data Protection Regulations ("GDPR") compliant organization, hence protection of information and its confidentiality must be strictly adhered to. Always protect clients', Invenio's, and Invenio's Representatives' confidential and other proprietary information. This is also Your contractual and legal requirement; breaches are subject to significant fines and the possibility of criminal prosecution. Do not publish anything online You would not share with a journalist, client, analyst, or competitor.

For example: Many technical forums/websites encourage people to 'contribute' to the repository of knowledge/articles to get access to premium content. Invenio Representatives must refrain themselves from sending any information (clients', Invenio's, and/or Invenio Representative's) on any such public forums or public domain emails.

Additionally, ensure that any information, photos, or personal data, regarding a colleague or other persons associated with Invenio, is not used without such individual's permission. Further, do not use Social Media platforms to exchange information or any kind of internal communication with colleagues or other Invenio Representatives.

e. Copyrights

Comply with laws and regulations and more particularly with local and global laws governing intellectual property rights, including copyrights and trademarks. Do not claim authorship and/or ownership for something that is not Yours. If another individual's material is used, ensure that You have the proper rights to make use of the same.

You must not post content or take any action that violates the law or infringes Invenio or any third party's intellectual property rights. You must obtain proper permission before using intellectual property rights (e.g. copyright or trademark), including for using any Invenio trademark(s) or copyright content. You can, however, share official brand information that Invenio has already circulated through Social Medial platforms, however, do not attempt to create Your own official-looking/appearing posts.

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f. Usage of Instant Messaging Apps

Communication tools/Instant messaging apps such as WhatsApp are commonly used to send text messages, share photographs, etc. instantly with another individual. This blurs the boundaries between professional and personal life, allowing individuals currently, to use instant messaging apps for both aspects. Therefore, it becomes difficult for Invenio to understand certain problems that may arise from Representatives using instant messaging apps such as WhatsApp in workplace.

Considering the above, Invenio strictly prohibits the usage of WhatsApp, and/or other similar instant messaging apps, for all professional communications. Do note that while WhatsApp does not store data from messages on its servers, it does hold the address book information of every one of its users, including contacts who have not even downloaded WhatsApp.

In accordance with GDPR law, sharing of any official information including incident number or any project information or client data or any business-related information is strictly against law. Moreover, do note that in cases relating to 'Prevention of Sexual Harassment at Workplace' ("POSH"), the data from personal WhatsApp is considered as evidence, in case of any complaint/case filed.

5. GENERAL GUIDELINES

At Invenio we encourage all employees to act as brand ambassadors on behalf of the company. While social media creates new opportunities for personal expression, it also creates new responsibilities. In this virtual world, all Invenio employees are in the field of view across our customers, partners and other third parties, and are therefore representatives of our business meaning we must always represent Invenio in the correct way. Whether you specifically reference or discuss your work, your participation on social media platforms reflects Invenio.

These guidelines are the first step, not the last, on your social media journey. Our marketing team, in association with our Academy team, will conduct various workshops and training covering various digital platforms to help you adhere to set standards.

These guidelines apply to company sponsored social media activity and personal use as it relates to Invenio. If you have any questions about the guidance provided or social media in general, please email rosina.obrien@invenio-solutions.com with a copy to marketing@invenio-solutions.com.

DOs

- Disclose, support transparency, and take responsibility when you refer to Invenio on social media. Any posts going against the set guidelines can potentially tarnish the Invenio brandwill ultimately be your responsibility
- Disclose that you work for Invenio Business Solutions
- Make it clear when sharing personal opinions, as opposed to acting as an Invenio spokesperson. Stating "in my personal opinion" will do the trick
- Monitor pages for compliments and criticism. If you come across positive or negative remarks about the company, please share them with rosina.obrien@invenio-solutions.com with a copy to marketing@invenio-solutions.com
- Watch this clip about how an error on social media can have a negative impact on you and the business

DON'Ts

- Share confidential company information or any internal or external personally identifiable information. If you have questions about what is considered confidential, please check with your manager or HRD team
- Post or reply to negative or disparaging posts about Invenio. Unless you are a certified online spokesperson, you must not respond. Share any concerning posts or comments with our official spokespersons who are trained to address such comments rosina.obrien@invenio-solutions.com with a copy to marketing@invenio-solutions.com
- Post anything libelous, pornographic, offensive, abusive or insulting at any time. You will be held responsible. If you require further information, please contact rosina.obrien@invenio-solutions.com with a copy to marketing@invenio-solutions.com

6. SUMMARY

Best way to avoid any claims and disputes relating to Social Media is for You to understand the acceptable use of Social Media and instant messaging in the workplace. Do remember that each one of You shall also be personally liable for any incriminating posts, wikis, blogs, or messages that maybe posted/sent out by You.

Use of social media platforms in accordance with this Policy can be a very effective and powerful communication tool. Be proud of what You do and enjoy a sense of accomplishment in the search for better quality and greater efficiency. Above all, please use good judgment, be attentive and

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respectful to others, and take the trouble to listen and be understood. Use Social Media to create powerful brand for Invenio.

7. PERIODIC REVIEW

IT team will perform risk assessment on the degree of social networking available to the employees to assess and help Company to streamline blocking of websites. IT and marketing team will conduct regular audits on existing internal controls, identify gaps, if any and provide suggestions to overcome them.