

# Social Media Policy

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## 1. Introduction

### 1.1 Objective

The new ways of communication are changing the way we talk to each other and shape the impression of SGA of clients, partners and other target groups. While SGA wants employees to share their workplace experience with the world, we encourage them to use social media the right way.

In order to avoid any problems or misunderstandings, this policy defines the guidelines when using of social media in office as well as when operating on the internet as an identifiable employee of SGA and its subsidiaries.

### 1.2 Definition of social media

For the purpose of this policy, social media shall be defined of any tool, platform or service that facilitates the creation and sharing of content over the internet. It includes, but is not limited to, social media networks, blogs, wikis, forums, messaging services etc.

### 1.3 Scope

The scope of this policy applies to all employees, contractors, interns and vendors of SGA who are active on social media

### 1.4 Glossary of Terms

Terms	Description
BUH	Business Unit Head
DH	Department Head
HR	Human Resource
ICC	Internal Complaints Committee
SGA	SG Analytics Pvt. Ltd.

## 2. Responsibility

The HR team shall be responsible for verifying the effectiveness of this policy and its revision whenever required

## 3. Policy Guidelines

1. Employees are obligated to familiarize themselves with and follow SGA's Code of Conduct
2. Employees are not allowed to use their official email ID for the purpose of private social media usage
3. Employees are personally responsible for the content they post on social media. Considering that the internet never forgets, employees should apply common sense before publishing content on social media and be aware of the impact this may have on their own or company's reputation
4. Employees should be aware that the online community might associate them with SGA, if they identify themselves as SGA'ites. Thus, employees' social media presence should be consistent with the way they wish to be perceived by clients and colleagues
5. Employees should be respectful to others. SGA does not tolerate any kind of harassment of other members of the organization or affiliated persons on social media. Such matters shall

be investigated and as per process defined in SGA's Anti-Harassment Policy and appropriate disciplinary action as per the recommendation of the ICC shall be taken

6. Employees should keep in mind the impact of their social media contributions on themselves, SGA and its stakeholders. Employees are prohibited to post content or share information that would cause any kind of harm to SGA or its stakeholders or compromises employee's ability to do their job. Few such instances include posting comments, content, or images that are confidential data, defamatory, pornographic, proprietary, harassing, libellous, or any such matter that can create a hostile work environment. This also applies to any after work hour online activity
7. Unless authorized by SGA as an official spokesperson, employees are not allowed to discuss and / or share internal information or content to the outside online community. This includes information which they have obtained through their work or affiliation with SGA, such as pricing, clients, financial results, work-related legal matters etc. as well as pictures of the workplace, office events etc.
8. Even internally, employees should limit the use and sharing of sensitive information, particularly personal information related to an identifiable member of the organization, to the bare minimum (principle of information minimization). As a rule of thumb, employees should ask themselves if the other party actually requires the information and which details are actually required before sharing sensitive information
9. Use of social media should in no way interfere with the productivity of an employee. Use of social media platforms is permitted on the company system only for business purposes and violation could result in disciplinary action being taken
10. Any social media content that generates attention or enquiry from media , press or legal sources should be redirected to authorized SGA management/spokesperson
11. Employees should observe proper copyright and reference laws when posting to social media
12. Employees are not allowed to cite or reference clients, partners or vendors without their prior approval
13. In case of doubt if an information can be shared, employees can talk to their manager or the compliance manager
14. Any inapt behavior that hurts the sentiments/respect of any employee, any disclosure of confidential (Employee, Client, Prospect, any other) data on social media that impacts the reputability or business of the organization shall not be tolerated and could lead to the most stringent action being taken up to and including termination and legal action
15. Employees found to be in violation of this policy may be subject to disciplinary action, up to and including termination of employment or contract and potential legal action

#### 4. Reference

SGA Code of Conduct

Anti-Harassment Policy