



## **SOCIAL MEDIA POLICY**

**CHANGE HISTORY**

<b>Date</b>	<b>Version</b>	<b>Created by</b>	<b>Approved By</b>	<b>Description of change</b>
08/10/2024	1.0	Bharath S	Ashwin Khosla	Basic document outline and submitted for review

## Purpose

The purpose of the social media Policy is to set expectations for appropriate and acceptable behavior on social media and ensure that communications and postings on social media will adhere to confidentiality and general standards at the company.

## Scope

This policy applies to

1. All employees
2. All third-party contractors with signed contracts
3. All independent contractors

The policy includes communication, and social posts on platforms such as but is not limited to

- Social networking forums (Facebook, LinkedIn, Twitter, Snapchat, WhatsApp)
- Social multi-media platforms (YouTube, Instagram, TikTok, etc.)
- Forums, blogs, customer review websites, bulletin boards (e.g., Yelp, etc.)
- Social gaming and other multimedia site (e.g., Twitch, etc.)
- Other wikis, blogs, vlogs considered public and social media

## Background

The growing importance of online social media networks as a communication tool is highly recognized and significantly impacts how internal and external communications take place at **Veranda Learning**.

Considering that in today's world, all employees are somehow connected to social media, any confusion, miscommunication, or accidental posts can lead to significant harm.

- PR crises
- Legal and regulatory issues
- Brand dilution or inconsistency
- General damage to the company's reputation

It is also of paramount importance that employee behavior, messages, and posts are steered in a positive direction.

## Policy

### Acceptable use of social media

Every employee is allowed to use social media during work hours as long as it does not impact their regular duties and job responsibilities, and the use is within the boundaries of acceptable use guidelines of the company's network, resources, and systems.

Employees are required to state in clear terms that the views expressed on any social media network are the employees alone and that they do not necessarily reflect the views of the organization.

All posts and social media communication must

- Be respectful, honest, and transparent. In other words, it should be similar to interactions in the physical workplace.
- Respect the privacy of employees, customers, partners, etc.

- Use common sense (e.g., assume any posts could make their way to the front page of a newspaper)

Employees must not:

- Post hate speech or discriminatory language about the organization, their co-workers, customers, competitors, agents, or partners that may violate the law or company policy
- Share any communication that engages in personal or sexual harassment, unfounded accusations, or remarks that would contribute to a hostile work environment (racial, sexual, religious, etc.), as well as any behavior not in agreement with the company's policies.
- Post something if they're not confident that it's legal or obeys company policy
- Engage in online spats or arguments

### **Handling confidential, intellectual, and business-sensitive information**

Employees are prohibited from

- Disclosing information on any social media network that is Confidential or Business Sensitive to the organization.
- Posting nonpublic images of the organization's premises and property such as meeting rooms, data centers, server rooms, etc.
- Posting, using, or claiming any intellectual company property as their own.
- Revealing trade secrets.
- Writing about financial information (such as financial condition, statements, results, sales numbers, projections, forecasts, or estimates).
- Posting strategic business initiatives (such as mergers, acquisitions, tender offers, joint ventures, or other fundamental business transactions).

In cases of confusion or if there is not enough clarity, employees must contact their manager or their contact in the Human Resources Department or the Marketing Department.

### **Handling news, marketing info, etc.**

Employees are free to share, retweet, and repost postings from the official company handle and are encouraged to do so. Employees are also encouraged to share positive news and postings otherwise publicly available.

Employees are, however, prohibited WITHOUT PRIOR PERMISSION.

- Display the company logo on any social media network
- Images of co-workers from company events without the co-worker's express prior consent or the company's permission
- Identifying or tagging customers as such information can be valuable to a competitor.
- Specific product information or pricing, which is already not public.
- Infringement on any party's intellectual property—copyright, patent, trademark, trade secret, right of publicity or privacy, or other proprietary rights—is *strictly prohibited* and is the employee's sole responsibility.
- Use any client or vendor trademarks or logos for commercial use,

Employees must seek written permission from the marketing department or their manager, who should get permission from the marketing department to post non-public content.

**Privacy and regulatory considerations**

The company ensures that advertising and document retention on social media complies with applicable consumer protection and compliance laws and regulations. These may include, but are not limited to:

- California Consumer Privacy Act of 2018 (CCPA)
- EU General Data Protection Regulation (GDPR)
- Health Information Portability and Accountability Act (HIPAA)
- Payment Card Industry DSS standards
- Others that may be applicable

**Enforcement**

Any nonconformance with this policy will be dealt with in the strictest possible way as per the sanctions policy. Following departments are responsible for monitoring and enforcing this policy

- Marketing department
- Human resources department

**Non- Compliance**

Violations of the policy may subject employees to disciplinary action, including removal of privilege to the systems, up to and including termination of employment. Sanctions for non-compliance may include, but are not limited to, one or more of the following:

- Disciplinary action according to applicable Veranda Learning policies.
- Termination of employment.
- Legal action according to applicable laws and contractual agreements.

**Validity and Document Management**

The owner of this document is the management, who must check and, if necessary, update the document at least once every 12 months