

Social Media/Networking Policy

Overview:

Social media both inside and outside the Company are transforming the way we interact. Online collaboration enables people to share knowledge and ideas regardless of rank, title, or experience. It's a way for us to take part in conversations around the work we do at Deft Marketers Private Limited (*Herein after referred as "company"*) and show our expertise in these areas.

While this digital interaction brings huge benefits, it also comes with certain risks and responsibilities. As a result, we have developed this code of conduct to ensure your interactions are safe, positive, and truly representative of the *Deft Marketers Brand*.

Scope:

This policy shall assist in providing guidance which shall applied to every employee, direct seller or any other person associated with the Company, and includes blogs, websites, microblogs, chat rooms, online forums, social networking sites and other services which shall assist in allowing the users to permit the necessary information with the legible manner.

Applicability:

The applicability of the policy shall apply to every employee, its customer, suppliers, vendors, direct sellers working with the Company or any other person associated with the Company.

Applicable laws

The Consumer Protection (Direct Selling) Rules, 2021, Consumer Protection Act, 2019, Consumer Protection (E-Commerce) Rules, 2020, Information technology act 2000 (IT Act 2000), Copyright Act, 1957 and any other applicable laws in regard thereto.

Purpose:

copyright © Deft Marketers private limited. All rights reserved.
All material in this policy is the property of Deft Marketers private limited. Any reproduction or publication thereof in any form or by any means whether electronic, mechanical, photocopying, cyclostyle, recording or usage in any manner whatsoever without the prior written permission of the Deft Marketers private limited, will invite civil and criminal action.

The goal of a social media policy is to set expectations for appropriate behavior and ensure that posts of every employee, its customer, suppliers, vendors, direct sellers working with the Company or any other person associated with the Company will not expose the company to legal problems or public embarrassment. Such policies include directives for when employee, its customer, suppliers, vendors, direct sellers working with the Company or any other person associated with the Company, should identify himself as a representative of the company on a social networking website, as well as rules for what types of information can be shared.

This policy is intended to minimize the risks of social media which can impact on the reputation of the Company and its offered products so that the Company can enjoy the benefits of social networking whilst understanding the standards of conduct expected by the Company.

Personal Account – Direct Seller

When creating your own accounts as a direct seller, one decision you need to make is whether you will use it for personal, professional, or for both.

You may choose to have social media accounts that are entirely personal: no mention of your employer in any situations, no sharing of Company content, no connection between your personal information and the *Deft Marketers*

During the modern times, it is considered impossible to keep the private and personal, and professional entirely separate.

Professional Account

As soon as you use a social media account or blog that links the content with *Deft Marketers*, there are specific guidelines you need to abide by:

- You are welcome to declare your role at *Deft marketers* in your user biography, but it should always be clear that the account is not a corporate channel but rather the voice of an individual.
- Once you have declared your association with *Deft marketer*, anything you post should reflect our Values and aligned with our ethical principles
- Do not include Deft Marketers as part of your profile or username
- Retweets or shares *are* endorsements (regardless of what people put in their bio), which means sharing content that constitutes an IPR infringement, defamation, disparagement or abuse will not be tolerated
- Never share content that is client confidential or reveals confidential intellectual property

DO AND DON'T FOR EMPLOYEE:

Different principles need to be followed upon for opting the use of social media on behalf of the Company and on personal use of social media.

DO:

- Employees need to know and adhere to the Company Code of Conduct and other Company policies while using the social media.
- Employees need to get proper information before posting images in response to the former employees, member, supplies. Employees need to get appropriate information with respect to use of third-party copyright, trademarks, service matter or other intellectual property.
- During working hours, all the employees need to focus on the work and shall not put any content over the social media.

DON'T S:

- Employees need not to publish, post or release any kind of information which has been considered confidential or not public. Employees need to take concern from

the Social Media Monitoring Committee in regard to the confidentiality of the information.

- Employee shall not Upload sensitive client/Company related information on social media/information sharing sites. Any discrepancy noticed is liable for strict legal action, against the BU/employee
- Employee shall not Upload objectionable content and tag Company channels within posts. We have a strict policy against miscreants who indulge in such activities
- Employee shall not Be involved in Character shaming, communal hatred, body shaming and/or vitriolic comments will not be tolerated.

DO AND DON'T FOR DIRECT SELLER:

Different principles need to be followed by the direct seller for opting the use of social media on behalf of the Company.

DO:

- Direct seller needs to know and adhere to the Company Code of Conduct and all Company policies while using the social media for promoting any kind of promotional product.
- The direct seller needs to ensure that all the promotional literature, advertisement materials must be approved by the Company.
- Direct seller shall ensure that promotional literature, advertisement or mail contain the name and address or telephone number of the direct selling company, and include the mobile number of the direct seller.

DON'T S:

- Direct Seller need not to publish, post or release any kind of information which has been considered confidential or not public. Direct seller needs to take concern from the Social Media Monitoring Committee in regard to the confidentiality of the information.

- Direct seller shall not Upload sensitive client/Company related information on social media/information sharing sites. Any discrepancy noticed is liable for strict legal action against such direct seller.
- Direct Seller shall not Upload objectionable content and tag Company channels within posts. The Company have a strict policy against miscreants who indulge in such activities.
- Direct seller shall not directly or indirectly, falsely represent itself as a consumer and postreviews about its goods or services or misrepresent the quality or features of any of its goods or services.
- Direct seller shall not make any claim in pursuance of a sale, that is not consistent with claims authorized by the Company.
- Direct seller shall not engage in selling product through any E-commerce platform (like Amazon, Flipkart, Snapdeal etc.)
- Direct seller shall not defame the goodwill or reputation of the company before the public, consumer, other Direct sellers or another Direct selling entities.
- Direct seller shall not participate in money circulation scheme in the garb of doing direct selling business.
- Direct seller shall not indulge in promoting Pyramid Scheme or enroll any person to such scheme or participate in such arrangement in any manner whatsoever in the garb of doing direct selling business through social media.
- Direct seller shall not violate any provision of code of conduct on social site.
- Direct seller shall not indulges in fraudulent activities or sales and shall take reasonable steps to ensure that participants do not indulge in false or misleading representations or any other form of fraud, coercion, harassment, or unconscionable or unlawful means through the using social sites or any social networking.
- Direct seller shall not Engage in, or cause or permit, any conduct that is misleading or likely to mislead with regard to any material particulars relating to its direct selling business, or to the goods or services being sold by itself or by the direct seller through the using social sites or any social networking.

- Direct seller shall not Indulge in mis-selling of products or services to consumers through the using/on social sites or any social networking.
- Direct seller shall not Use, or cause or permit to be used, any fraudulent, coercive, unconscionable or unlawful means, or cause harassment, for promoting its direct selling business, or for sale of its goods or services through the using/on social sites or any social networking.
- Direct Seller shall not announce of any Charge any entry fee or subscription fee through the using/on social sites or any social networking.
- Direct Seller shall not induces consumers to make a purchase based upon the representation that they can reduce or recover the price by referring prospective customers to the direct sellers for similar purchases through the using/on social sites or any social networking.
- Direct Seller shall not engaged in unfair trade practice as defined in consumer protection act, 2019 through the using/on social sites or any social networking.
- Direct Seller shall not promote to any other Direct selling company entity/entities in own name or through the other dummy person/persons through the using/on social sites or any social networking.
- Direct Seller shall not defames the goodwill or reputation of the company before the public, consumer, other Direct sellers or another Direct selling entities through the using/on social sites or any social networking.
- Direct Seller shall not instigates to other direct sellers against the company through the using/on social sites or any social networking.
- Direct Seller shall not indulge in cross line sales and such promotion through the using/on social sites or any social networking

Social Media/Networking Ethics

DO'S

1. Do like, comment, and reply to posts.

“like” represents a nod, and a comment continues the conversation.

2. Keep your private messages private. If you feel a need to talk to someone, don't do it in a comment, or a post on their page.
3. Keep your posts, positive about your company, your team, and your business
4. Remember that a post could be read by anyone! Think about your audience, how you are presenting yourself, and what your message says before hitting “post”.

DONT'S

1. Don't add any other Direct seller or any other person to your group without asking him/her.
2. Don't tag any other Direct seller or any other person in your special offers.
3. Don't “vague-book.” These rants are nonspecific, not kind and turn other people off.

Here is an example. Really? Would you want to do business with this person?

4. Don't make every post about your business, product, or opportunity. People want to know you, buy “you” before your service or product.
5. Don't do the “undercover” brag.

That is a post when you are bragging about anything and trying to make it look like you aren't. If you want to be proud out loud, own it, don't disguise it. Better to say: “I had a great week!” than this:

6. Don't interrupt a post with an unrelated reply.

For example, if another consultant is posting about the product or opportunity and you love her post, don't ask to “steal” it or “borrow” it in the comments.

SOCIAL MEDIA MONITORING COMMITTEE

Committee has been formed by the Board of Directors of the Company which shall monitor time to time posting of information on the social media and provide information to the

concerned person in case of any prohibited content published by direct seller, employee, customer or any other associated person with the Company.

The committee shall time to time regulate the provisions with regard to the social media content and do necessary regards thereto.

Think Before You Post

Keep in mind that most online social platforms are like public marketplaces: what's out there is available for all to see. On social platforms, the boundaries of professional and personal information are not always clear. 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. What you post will reflect on you, so be consistent with the way you would wish to portray yourself to friends, family, colleagues, and clients.

If you are unsure whether certain content is appropriate to share online, then don't post it. It's better to be safe than sorry.

Responsibility

You are personally responsible for your words and actions, no matter where you are, even in the online world. Please remember that when you participate in social media, you are speaking as an individual and not on behalf of the Company. Identify yourself using the first person singular.

When you discuss Company -related information online, be transparent by giving your name and role and mentioning that you work for the Company. If you have an individual site that refers to or has an impact on the Company, use a disclaimer such as

"The views expressed on this site are my own and not those of Deft Marketers ."

Where applicable law permits, be aware that the Company reserves the right to monitor use of social platforms and take appropriate action to protect against misuse that may be harmful to the Company's reputation.

Establishing a corporate account or becoming an official Company representative or direct seller that shares information about the Company and the areas we work in, requires approval from the Company. Only these accounts may display the company logo. If you would like to represent **Deft** or create a corporate account, please contact your Social Media Monitoring Committee of the Company. If a member of the press or online media contacts you about online content concerning **Deft**, please refer them to the Social Media Monitoring Committee of the Company.

Conduct

Your behaviour online should be consistent with Our Code of Business Ethics and Acceptable Use Policy. You have the opportunity to help shape the reputation of the Company. Use your expert knowledge to enrich discussions, help solve problems, share the excitement of our work environment, promote learning and idea-sharing.

Trust is the key element in building relationships online. Build trust by keeping a respectful tone, even when disagreeing with others, and by responding to comments in a timely manner. If you realize that you've made a mistake, try to correct it promptly.

Do not engage in any conduct online that would not be acceptable in your workplace or that is unlawful. For example, do not make derogatory remarks, bully, intimidate, harass other users, use insults or post content that is hateful, slanderous, threatening, discriminating, or pornographic.

The Company respects personal opinions and you should respect others and their right to think differently to you. It is worth remembering that topics involving politics, religion and sexuality can be highly sensitive and you should consider refraining from addressing topics that may be deemed personal, objectionable or even offensive. You should not make remarks, jokes or display material that may offend a member of a particular race, religion or gender.

Please also bear in mind that your readers, due to a lack of non-verbal communication or cultural differences, can interpret the tone you use online in different ways. Some participants may not be familiar with abbreviations, emoticons, and other common codes used in online communication. Remember also that comments are often taken out of context, so stick to the facts.

Confidentiality

Always protect clients', the Company 's, and suppliers' confidential and other proprietary information. This is a contractual and legal requirement; breaches are subject to significant fines and the possibility of criminal prosecution. Do not publish anything online you wouldn't share with a journalist, client, analyst or competitor.

Make sure any reference to clients, partners, and suppliers does not violate any non-disclosure obligations. Please also remember your confidentiality obligations under your employment agreement.

Do not disclose information about colleagues or other persons, misuse their personal data or publish their photos without their permission.

Even when the application is behind SSO, users should still use good judgment regarding information that could be of a sensitive nature. Don't use social platforms to exchange information that is client, Company or supplier confidential, unless access is restricted to a tightly controlled closed community with each participant having been cleared for receipt of such information and the platform has been cleared for appropriate security levels.

Intellectual Property Rights

Comply with laws and regulations and more particularly with laws governing intellectual property rights including copyrights and trademarks.

You must not post content or take any action that violates the law or infringes Company or any third party's intellectual property rights. You must obtain proper permission before using intellectual property rights (e.g. copyright or trademark).

Concerning **Deftmarketer** trademarks, in addition to the rules described in this document, you must comply with the Policy and the Visual Identity Guidelines.

Final thoughts

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 to others, and take the trouble to listen and be understood

Posting on social media sites by Direct Seller and Employee

- Maintain the confidentiality of Company trade secrets and private or confidential information. Trades secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.
- Do not create any link from our blog, website or other social networking site to a Company website without identifying yourself as a Direct Seller, Company, employee and vendor.
- Express only your personal opinions. Never represent yourself as a spokesperson for Company. If Company is a subject of the content you are creating, be clear and open about the fact that you are an associate and make it clear that your views do not represent those of Company, Direct Seller, customers, suppliers or people working on behalf of Company. If you do publish a blog or post online related to the work you do or subjects associated with Company, make it clear that you are not speaking on behalf of Company.

If any one wishes to comment on behalf of the Company it may be written as **“The postings on this site are considered to be my own and does not reflect any views on behalf of the Company”**

Prohibited Content

- **Illegal product:** The adverts shall not facilitate or promote any illegal content. Adverts targets need to be there to not promote the products, services which has been considered inappropriate. Illegal or unsafe or mislead any of the target group.
- **Tobacco and other related product:** Advertisement shall not promote the sales of use of any of the tobacco product and any of the products that shall result in smoking and other related concerns.
- **Adult Content:** The advertisement shall not contain any adult contain such as sexually suggestive content, vulgarity, etc
- **Unsafe substances:** The advertisement must not promote the sale in relation to the unsafe drugs or any other products which are not safe to use.
- **Third party infringement:** The advertisement shall not contain any content that shall infringes or violates any of the third-party right that may include with copyright, trademark, privacy, publicity or other proprietary rights.
- **Misinformation:** The advertisement shall not contain any information which has been misleading, false or induce consumer to buy any product on account of trust of it.
- **Cheating and deceitful practices:** The content of the advertisement shall not promote products or designs that induces the customer to engage in some cheating and deceitful practices.
- **Health:** The advertisement shall not contain or attempt to generate any negative image in respect to promoting diet loss, weight loss or any other health related products.
- **Personal attributes:** The advertisement shall not contain the content that asserts or implies personal attributes. This will comprise of direct or indirect associations or implications in respect to race, religion, belief, gender identity, physical or mental health.
- **Bully, harass or threaten violence:**The advertisement shall not bully, harass or threaten violence against anyone on or outside of social/print media or any

documents. If you find yourself in a disagreement on social/print media or any documents, use a respectful tone or disengage.

- **Controversial Content:** The advertisement shall not contain content that exploits crises or controversial political or social issues for any commercial purposes.
- **Multi-level marketing:** Those advertisement that promote income opportunities need to describe the associated product or business model and not necessarily promote the business models of offering quick money for some amount of investment including multi-level marketing opportunities.
- **Drugs and Magic Remedies (Objectionable Advertisements) Act, 1954:**

No person shall take any part in the publication of any advertisement referring to any drug in terms which suggest or are calculated to lead to the use of that drug for

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1. The procurement of miscarriage in women or prevention of conception in women; or
2. The maintenance or improvement of the capacity of human beings for sexual pleasure; or
3. The correction of menstrual disorder in women; or
4. The diagnosis, cure, mitigation, treatment or prevention of any disease, disorder or condition specified in the schedule of the Act, or any other disease, disorder or condition.

Related Policies and Consequence of Violations

All Direct seller /Employee/any person associated with the company, you are expected to adhere to this policy on social/electronic and print media, including but not limited to Twitter, LinkedIn, Instagram, Facebook, WeChat, YouTube, Flickr, Twitch, blogs, wikis or any other tool or service that facilitates interactions over the internet.

This policy supplements other Company's policies and standards, including the Deft Marketers private Limited Code of Conduct Policy.

If your post would violate aDeft Marketers policy in another forum, it will also violate it on social/print media or any documents. Direct seller /Employee who violate this or other Deft Marketers policies may be subject to disciplinary action up to and including termination in accordance with the applicable laws.

Notification of Changes

We keep our Social Media Policy under regular review to make sure it is up to date and accurate. Any changes we may make to this Policy in the future will be posted on this page. We recommend that you re-visit this page regularly to check for any updates.

For any additional questions or support, reach out to:- socialmedia@deftmarketers.in