

## **PDS Limited Communications Policy 2022**

The PDS Limited (“**PDS**”) Communication Policy (“**this Policy**”) applies to all individuals worldwide working for all affiliates, subsidiaries, and joint ventures of PDS (“**PDS Group**”) at all levels and grades, including Employees (as defined herein) associated with us.

This Policy governs the use of information for communication purposes (including broadcast, social media, etc.) within the Employees of PDS Group and provides guidance for participation in all forms of communications across media platforms. ‘Communications’ means and includes all mechanisms of communicating information both within the PDS Group and externally to existing and potential customers, regulators, shareholders, suppliers, vendors, government and non-governmental organisations, media and to the public at large. Each entity at PDS Group is responsible for establishing internal and external communications practices in order to foster consistent and favourable recognition of its own and PDS Group’s identity, structure, and capabilities among its internal and external audiences.

It is expected from all who are engaging in communications with various stakeholders whether on behalf of PDS Group or otherwise, to understand and to follow these guidelines, if any of their actions involve any information related to PDS Group companies in any manner, including but not limited to the information which are of price sensitive in nature. Failure to do so can put future participation at risk and non-compliance of applicable laws. This Policy will continually evolve as new technologies in communications, broadcast and social media emerge and shall continue to apply even if you cease to be an Employee of PDS Group.

### **Definitions:**

In this Policy, use of terms “we,” “us,” “our,” “Company” and “PDS/PDS Group” refer to PDS Group and / or its affiliates, subsidiaries, and group companies. The terms “you,” “your” and “employee” refer to every person who works / worked at PDS Group.

PDS Group takes pride in its core values of Ideapreneurship, Trust and Transparency. This Policy provides for a framework for us to operate in, to ensure uniformity in participation. Social media is distinguished by its sense of community building and engagement, which is in sync with PDS Group’s culture of transparency and openness.

### **This Policy will come into effect from June 03, 2022**

For the purpose of this Policy, the following terms will have the respective meanings assigned to them:

- a. ‘Media’ shall mean and include but not limited to any of the following: (i) internet portals including Social Media platforms; (ii) television channels; (iii) radio channels; (iv) magazines; and (v) newspapers (vi) newsletters.
- b. ‘Employee’ shall mean directors, senior executives, officers, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, seconded staff, casual workers, volunteers, interns, agents, or any other person of PDS Group.
- c. ‘Social Media’ shall mean and include any web or mobile or other platform(s) that enables and facilitates interactive communication or permits exchange/posting of user generated content, including without limitation blogs, micro-blogs, online forums, social networking websites/applications, content sharing websites/applications, podcasts, vlogs and video sharing websites/applications, wikis, social bookmarking services, user rating services and other digital channels established for online interaction and connection via any audio and/or audio-visual means.

## **INFORMATION**

Employees should refrain from commenting or sharing any information, data, insights or opinions on industry growth figures, expenditures (overall or sector wise) and/ or any data and figures related to our core and non- core industries. If any specific information such as the above (which are not available in the public domain) as required by media house or any other external agency, you may reach out to the Corporate Communications team at [corpcomm@pdsLtd.com](mailto:corpcomm@pdsLtd.com).

## **SHARING OF NEWS AND INFORMATION**

As a listed Entity, PDS is obligated by law to keep all price sensitive information confidential. All final signoffs on announcements including financial and sensitive information will be done by the Business Head of respective business verticals, keeping the PDS Group CEO's Office and corporate communications team informed.

In your communication to the media house or any other external agency, you may use any financial information, that has already been reported to the Indian Stock Exchanges, and/or available on the website of PDS at [www.pdsmultinational.com](http://www.pdsmultinational.com).

## **PROTOCOL FOR USING SOCIAL MEDIA FOR PERSONAL USAGE**

The following principles provide guidance when engaging in personal or unofficial offline and online activities including Abide by PDS Group policies - To the extent personal social media activities may reflect upon or otherwise impact PDS Group's business, all employees must adhere to the PDS Group Code of Conduct, as well as all other policies of PDS. Be aware of conflicts that may arise from taking strong positions that are contrary to the PDS Group's interests. Employees should remember that any information that is shared with online media and stakeholder groups instantly becomes permanent and public. **NEVER** disclose or share any non-public, price sensitive or confidential information about PDS Group such as the following (which is only indicative and not exhaustive) and it is applicable to all Employees of PDS Group:

### **Personal Accountability**

You will be held accountable if your activities harm PDS Group's image or reputation. We encourage your involvement in the online community but urge that you do so with awareness and responsibility that your actions have far-reaching consequences.

### **Raise Internal Awareness**

You can help PDS Group stay aware of how it is being perceived in the social media space. If you encounter positive, negative or inaccurate remarks about PDS Group in the social media space and believe that they deserve attention, the same should be shared with the Corporate Communications Team at [corpcomm@pdsLtd.com](mailto:corpcomm@pdsLtd.com). Your vigilance can help PDS Group to improve communication and/ or take appropriate action against misinformation.

### **Be Aware of the Broader Audience**

PDS Group respects the freedom of expression. However, comments and content addressed to friends and family can reach a broader audience than originally intended, including customers, colleagues, third parties and other business associates. The accuracy of information, the need for publishing / sharing such information and all possible repercussions ought to be well considered before publishing/ sharing any PDS Group related content.

### **Corporate Policies, Review and Oversight**

Traditional advertising laws apply to all media offline and online. Information should be truthful, protect vulnerable market segments (i.e., children, market illiterates etc.) and not potentially be misleading. Claims about PDS Group and its solutions/ services must be substantiated by current, relevant, and reliable data on record at the time when the claim was made. As with any other advertising, claims should be consistent with approved message maps. Use proper trademark attribution and follow PDS Group's brand guidelines. You may write to the PDS Corporate Communications team for assistance at [corpcomm@pdsLtd.com](mailto:corpcomm@pdsLtd.com).

### **Non-public, Confidential and Privileged or Proprietary Information**

Transparency is a hallmark of engaging in social media activities, yet you CANNOT disclose or share non-public, price-sensitive, or confidential information including PDS Group's Information. PDS Group's Information includes, but is not limited to, existing, new/future services or commercial availability/ pricing, financials – either actual or projected, plans, news, internal memos or other private content, any information about litigation or other legal matters and proprietary data.

### **Third Party Rights, Fair Use and Data Privacy Principles**

Employee should not infringe upon the IP Rights of the Company and that of others. Do not use the copyrights, trademarks, publicity rights or other rights of others without the necessary permissions of the rights holder(s).

### **Accurate Record Keeping**

Maintain accurate records of all online interactions and regularly monitor ongoing conversations. Online Company statements can be held to the same legal standards as other official media communications, so be sure to keep track of all external dialogue.

### **Inappropriate/ Offensive/ Misleading Information**

Usage of obscenities, insults or other offensive references, disparaging remarks, personal attacks, racial, religious, political, or inappropriate content is strictly forbidden. Do not reveal any misleading information, in any circumstances which would go against the framework of this Policy.

### **GUIDELINES FOR KEY SOCIAL MEDIA PUBLISHING PLATFORMS**

Further to the above-mentioned protocols and without any dilution thereof, following are the guidelines specific to various social media publishing platforms:

#### **Guidelines for Blogs**

##### *DOs:*

- Employees are allowed to have their personal blog Employees can identify PDS as their employer

##### *DON'Ts:*

- Employees are not allowed to create any blog on behalf of PDS Group or any of its service lines, vertical, or any subunit, unless approved, in writing by the Corporate Communications Department. Please write to [corpcomm@pdsLtd.com](mailto:corpcomm@pdsLtd.com)
- Do not criticize PDS Group's competitors either in your personal or competitors' official blogs.
- Do not post or reveal details about PDS Group's customers' information, engagement, deals, revenue & headcount information etc., unless authorized or if the information is already in public domain through proper channels
- PDS Group Employees should not use PDS as their First Name/ Last Name in their personal profile

#### **Guidelines for Micro Blogging Sites – e.g., Twitter**

##### *DOs:*

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- Employees are allowed to have their personal handles on micro blogging platforms, and can identify PDS as their employer

*DON'Ts:*

- Employees are not allowed to create any handle on behalf of PDS Group or any of its service lines, vertical or any subunit.
- Do not post or reveal details about PDS Group's customers' information, engagement, deals, revenue information, project headcounts etc., unless authorized or already in public domain
- Employees should not use PDS as their First Name/ Last Name in their personal profile

### **Guidelines for Social Networks- Facebook/Instagram/ Snapchat/ TikTok**

*DOs:*

- Employees are allowed to have their personal profile on Social Networking Sites
- Employees can identify PDS Group as their employer on social networks

*DON'Ts:*

- Do not create pages for PDS/ Associated Line of Business on social networks.
- Do not criticize PDS Group's competitors or involve in promoting PDS Group's identity on competitors' official pages on Facebook
- Do not post Wall posts/ photos/ videos in personal profile pages on Facebook that may contain negative remarks on PDS Group or confidential information about PDS Group
- Employees should not use PDS as their First Name/ Last Name in their personal profile
- Do not post or reveal details about PDS Group's customers' information, engagement, deals, revenue info, project headcounts etc., unless authorized or already in the public domain from the authorized channels

### **Guidelines for Professional Networking Sites - LinkedIn**

*DOs:*

- Employees are allowed to have their personal profile on LinkedIn
- Employees can identify PDS Group as their employer on LinkedIn and use their functional designation
- Employees can join official PDS Group and Company page on LinkedIn
- Employees are encouraged share web pages of official web properties on their profile using the "Share on LinkedIn" widget available on their profile page setting
- Employees are allowed and encouraged to share content disclosed by the company across any platforms with the personal network

*DON'Ts:*

- Do not create personal groups about PDS/ Associated Line of Business/ Industry on LinkedIn.
- Do not falsify your designation at PDS on your professional networks
- Do not criticize PDS Group's competitors on various topics posted by the competing companies 'groups/ Company pages
- Do not post or reveal details about PDS Group's customers' information, engagement, deals, revenue info, project headcounts etc., unless authorized or already in public domain
- Do not use PDS as your First Name/ Last Name in your personal profile
- Avoid joining unofficial groups containing PDS's name as misnomer

### **Guidelines for Photo Sharing Sites – Flickr/ Picasa/Pinterest/ Behance**

*DOs:*

- Employees are allowed to have their personal profile on photo sharing sites like Flickr, Picasa, and Pinterest etc.
- Employees are allowed to share pictures of public areas of the PDS offices

*DON'Ts:*

- Do not share images that are under copyright or trademark registered
- Do not share PDS infrastructure pictures
- Do not share pictures of confidential content owned by PDS/ customers/ clients
- Do not share print screen images containing confidential information about PDS/ customers/ clients
- Do not use PDS as your First Name/ Last Name in your personal profile

**Guidelines for Document Sharing Sites – Slideshare/ Docstoc/ Scribd/ Canva**

*DOs:*

- Employees are allowed to have their personal profile on document sharing sites like Slideshare, Docstoc, Scribd, etc.

*DON'Ts:*

- Do not share any documents containing content owned by PDS, unless authorized or already in public domain
- Do not share confidential internal process/ client documents pertaining to PDS's business
- Do not share any work product created by you during your tenure at PDS Group. This is applicable even after you leave the company

**Guidelines for Video Sharing Sites – YouTube/ Vimeo etc.**

*DOs:*

- Employees are allowed to have their personal profile on video sharing sites like YouTube, Vimeo, etc.
- Employees are allowed and encouraged to share company videos uploaded on video sharing websites with the personal network

*DON'Ts:*

- Do not create any video channel/ account representing the Company
- Do not share confidential videos like internal training, customer visits, etc.

**OFFICIAL SPOKESPEOPLE**

- An official spokesperson or single point contact for media communication is identified at PDS Group for all news related to the company.
- A list of sector/ COE specific spokespersons is also identified on a case-to-case basis when subject matter expertise is needed. For journalist and media requested you should contact the Corporate Communications team to align all media requests.

**CORPORATE IDENTITY**

The PDS Logo is a Company trademark. Employees are advised to use this trademark responsibly and without infringing it. We encourage partner companies to use the PDS logo as required, adhering to brand guidelines when representing the Company in all official communication and marketing material. You may write to the PDS Corporate Communications team for assistance at [corpcomm@pdsLtd.com](mailto:corpcomm@pdsLtd.com).

**LOCAL LAW TRIUMPHS**

*Private & Confidential*

In the event if there is any inconsistency or conflict between the terms of this Policy and any applicable laws and/ or regulations, the provisions of applicable laws and/ or regulations shall prevail to the extent of such inconsistency or conflict.

#### **BREACH OF POLICY**

If an Employee is found to be in breach of this Policy, disciplinary action would be initiated which may include dismissal from the employment, depending upon the facts and circumstances of each case. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and whether PDS Group's electronic equipment or other property are used for the purpose of committing the breach. Appropriate legal actions may be initiated against persons, who have breached this Policy even after they cease to be an Employee of PDS Group.

Further, Employees should not speak to the media. All queries should be directed to your **Corporate Communications team** at [corpcomm@pdsLtd.com](mailto:corpcomm@pdsLtd.com).