



**APAC FINANCIAL SERVICES PRIVATE LIMITED**

("APAC" or the "Company")

**SOCIAL MEDIA POLICY**

**Review Calendar:** Scheduled review in December- January of each year, unless in the opinion of the Managing Director or policy owner a review of the policy is needed sooner.

**Approval Date:** January 23, 2026

| Owner          |   |      |           |
|----------------|---|------|-----------|
| Name           | Designation                               | Date | Signature |
| Prashant Hegde | Product Head –<br>Business Loans<br>Micro |      |           |
| Mehak Chadha   | Senior Vice<br>President                  |      |           |

| Reviewer      |  |      |           |
|---------------|--|------|-----------|
| Name          | Designation  | Date | Signature |
| Nikhil Bandi  | Chief Technology,<br>Digital & Operations<br>Officer |      |           |
| Sanjay Sharma | Chief People Officer                                 |      |           |

| Approved by   |                   |      |           |
|---------------|-------------------|------|-----------|
| Name          | Designation       | Date | Signature |
| Gunit Chadha  | Managing Director |      |           |
| Sankar Sastri | CEO               |      |           |

## Revision History

| Date       | Version | Made By      |
|------------|---------|--------------|
| 27-12-2023 | 1.0     | Mehak Chadha |
| 10-12-2024 | 2.0     | Mehak Chadha |

## **1. INTRODUCTION:**

With the emergence of new media and advanced communication tools, the ways in which companies communicate internally and externally continue to evolve. While this creates new opportunities for customer acquisition, communication, and collaboration, it also creates new responsibilities. For companies, it introduces new regulatory and reputational issues, among other issues.

Social media encompasses internet technologies that facilitate online sharing of content by users (individual or body corporate), including but not limited to, social networks such as Meta, LinkedIn, Twitter, Google, Glassdoor and so on and so forth.

## **2. OBJECTIVE:**

This Policy outlines the guidelines and expectations for the use of social media by APAC's customers, stakeholders, as well as the general public. The purpose is to help maintain a professional online presence, adhere to regulatory requirements, observe the rules & regulations of the various social media platforms, and protect the reputation of APAC.

## **3. POLICY FOR CUSTOMERS & GENERAL PUBLIC:**

- APAC's social media channels serve as an extension of our commitment to transparency and communication. While APAC endeavors to provide accurate and up-to-date information on its social media platforms, all content posted on social media channels are meant to be indicative and informative in nature. The information and material available on the Company's social media platforms, including text, graphics, links, or other items – are on an "as is," "as available" basis. No warranty of any kind, implied, express, or statutory is given in conjunction with the information and material. The content does not imply any contractual obligation on the part of the Company. For the most authentic information, please visit the corporate website <https://apacfin.com/>.
- APAC reserves the right to change content posted on its social media channels as and when required without prior intimation to any person.
- No information or opinion provided by the Company or through a third party on the page is intended to constitute legal, tax, securities or investment advice, or opinion regarding the appropriateness of any investment, or a solicitation for any product or service. For the most authentic information, please visit the corporate website <https://apacfin.com/>, email us at [contactus@apacfin.com](mailto:contactus@apacfin.com), call us at 1800-313-205-205 or visit your nearest APAC branch.
- Sharing the content posted on APAC's social media channels in its original format is permitted and encouraged. However, no one has the right to use the same content for monetary purpose or change, alter, modify, amend, revise, publish, translate, copy, or otherwise distribute any part or content posted thereof, or link any other social media platforms or any other website to APAC's page.
- APAC wishes to maintain a respectful and inclusive environment on its social media channels. Please refrain from the use of abusive, obscene, intimidating, discriminatory, defamatory, offensive, unpleasant, threatening, harassing and/or improper language that targets specific individuals or groups while communicating with APAC/others on APAC's page.
- The Company reserves the right to remove without intimation, any comments/posts that use discriminatory, defamatory, threatening, obscene, intimidating, discriminating, harassing, hateful, improper language, spam or violate any intellectual property rights or may contain virus or are immaterial and unconnected to the topics discussed on our page or any matter that the Company deems as inappropriate in any way. It is not possible for the Company to fully monitor all comments/posts on its social media platforms but wherever it comes to the notice of the Company that any

comment/post is not in line with this Policy, then the Company reserves its right to remove it from its social media channel. Any individuals/entity making such posts may be blocked, without intimation, from making further posts on APAC's social media channels. The same is at the sole discretion of the company and may be done without prior notice.

- Posts regarding selling of any product and services etc. by any person shall be prohibited on APAC's social media channels. Individuals/any entities making such posts may be blocked, without intimation, from making further posts on Company's social media channels and the comments/posts will be removed from APAC's social media channels. The same is at the sole discretion of the company and may be done without prior notice.
- Please refrain from posting any content which may violate any law or regulatory provisions, or which may be against public policy, or which may infringe the privacy rights of any person.
- The Company may not take up specific customer queries or complaints due to reasons of confidentiality and privacy, since resolution of such matters require customer sensitive details which should not be posted on any social media platforms due to the risk of information/identity theft which may result in financial and other losses to our customers.
- APAC neither undertakes to be monitoring all these social media platforms at all times nor is obligated to respond to posts made on these regarding APAC. However, the Company has put in place an online response management process to provide suitable responses to comments of the users.
- For any customer complaints, a customer should either make a written complaint addressed to the relevant Branch Manager (contact details for the Company's branches/ places where business is transacted are on the Company's website), call the Company at [91 22 47781138] during office hours (9:30 a.m. to 6:00 p.m.), or email the Company at [contactus@apacfin.com](mailto:contactus@apacfin.com). APAC's Grievance Redressal Policy may be found on the Company's website (<https://apacfin.com/grievance-redressal-policy>).
- Stakeholders should promptly report any unauthorized or inappropriate social media activities to [marketing@apacfin.com](mailto:marketing@apacfin.com). Any ideas or suggestions may also be sent to [marketing@apacfin.com](mailto:marketing@apacfin.com).
- All information posted by the Company including but not restricted to brand names, features, color schemes etc. may be safeguarded by trademarks, copyright, and other legal measures available to the Company. Hence, please do not copy, amend or in any other manner use the content posted by the Company without prior written permission.

#### **4. PRIVACY:**

- Since the content of all comments/ posts is immediately released into the public domain, refrain from posting any content about anyone who does not wish to be broadcasted about to the general public or any private content.
- Any data and information that is posted on social media platforms may reside on servers that the Company does not own or control. Often, the data and information posted on social media platforms is available to any and all members of the public as per the social media platforms' policies. Even upon deletion, the data may be archived by the social media platform as per their policies.
- Users should not post personal or account sensitive information such as debit/ credit card number, PIN passwords, phone numbers identification numbers and account numbers etc. on social media.
- APAC does not undertake any liability for any financial and/or other losses, identity/information theft or any such issue faced by users on account of posting their sensitive/ personal information, on its social media channels.
- Social media users must conform to the respective platform's Terms and Conditions and its prevailing Privacy Policy or any regulatory norms that must be adhered to.

## **5. THIRD PARTY INFORMATION:**

- APAC is not responsible for the content, privacy or security policies of any external websites or links.
- Any third-party views and opinions in APAC's comments or posts are solely and exclusively of the user/ such third party. APAC neither takes any responsibility for such views, nor endorses their views. This is inclusive of the text, images, documents, audio, and videos added, posted, or linked by the users/ third parties.
- The Company does not take any responsibilities or provide warranties regarding the accuracy or functionality of third-party social media channels. No guarantee is given from the Company regarding complete security of sending or posting or uploading any content over the Internet as they are subject to possible interception, alteration, or loss.
- APAC does not endorse the advertisements and any content or links provided by social media websites on our social media channels and will not be responsible for the same.

## **6. LEGAL ACTIONS:**

- Any communications made via the Company's social media platforms will in no way constitute a legal or official notice to the Company or any official or employee of the Company for any purpose.
- Any content posted on the Company's social media platforms shall be deemed and remain the property of the Company. The Company shall be free to use such content/information, for any purpose without any legal or financial compensation or permission for such usage.
- The Company reserves its right to initiate appropriate legal proceedings in the event of any breach/ violation of guidelines/ other terms and conditions as may be specified by the Company from time to time.
- Under no circumstances shall the Company or any of its affiliates, Directors, employees, or representatives, be liable to any user for any direct or indirect, claims or damages whatsoever emanating from any mistakes, inaccuracies, or errors of content, personal injury, or property damage, of any nature whatsoever, emanating from user's access of APAC's social media channels or entities purporting to represent APAC. User specifically acknowledge that the Company shall not take any liability for content or the offensive, defamatory, or illegal conduct of any third party and that the risk of damage or harm arising from the preceding entirely rests with user. The foregoing limitation of liability shall apply to the fullest extent that's permitted by law in the applicable jurisdiction.
- To the extent permitted by law applicable, user shall indemnify the Company, its affiliates, officers, directors, and employees, from and against any and all damages, claims, obligations, liabilities, losses, costs and expenses (including but not limited to lawyer's/attorney's fees) arising from: (i) the user's use of and access of APAC's social media channels; (ii) the user's violation of any of this Policy; (iii) the user's violation of any third party right, including without limitation any copyright, proprietary, or right to privacy; or (iv) all or any claim that content posted by the user caused damage to any third party. The indemnification contained herein shall survive this Policy and user's access of APAC's social media channels.
- Anyone with the intent to cause or knowing that he/ she is likely to cause wrongful loss or damage to the brand's image, to destroy or delete or alter any information residing on the Social Media platform or diminish its value or utility by any means, commits hack, shall be prosecuted under Information Technology Act, 2000 [As amended by Information Technology (Amendment) Act 2008], its subsequent amendments as well, and any other statute prescribed by the concerned authorities.

**7. APPLICABILITY OF LAW:**

- This Policy shall be governed and construed in accordance with the laws of India and any dispute or claim that may arise shall be exclusively decided by a Court of competent jurisdiction located at Mumbai only.