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# Social Media Policy

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Policy Details

Objective
This policy provides guidance for participation in online social networking sites, interactive forums, blogs, wikis, chat rooms, podcasts, video aggregation platforms or any other kind of social media platforms. It is expected from all who are engaging in social media whether on behalf of HCL or otherwise, to understand and to follow these guidelines, as long as their action involves HCL name or HCL Information (as defined later) in any manner. Failure to do so can put the future participation at risk. This policy will continually evolve as new technologies and social media tools emerge and shall continue to apply even if you cease to be an employee of HCL.

Scope & Applicability
This policy applies to all individuals worldwide working for all affiliates and subsidiaries of HCL at all levels and grades, including 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 associated with us, (collectively referred to as “You” or “you” in this policy).

Definitions: In this policy, use of terms “we,” “us,” “our,” “Company” and “HCL” refer to HCL Technologies Limited and / or its subsidiaries. The terms “you,” “your” and “employee” refer to every person who works / worked at the Company including the senior management or serves on its Board of Directors. “HCL Information” means and includes information of HCL, its subsidiaries, affiliates, joint ventures, partners, customers, vendors, agents, resellers, representatives, consultants and any other persons engaged in any business with HCL.

Policy Details
How the policy relates to the organization’s core values
HCL takes pride in its core values which are Employees First, Value Centricity and Trust through Transparency. One of the key tenets of this philosophy is to take the same philosophy to online audience & build the same identity for which HCL is known for. Hence, a framework needs to be put in place for us to operate in, so as to ensure uniformity in participation. Social media is distinguished by its sense of community building and engagement, which is in sync with HCL’s culture of transparency and openness. Social media also empowers employees to connect directly
with the Company stakeholders underlining our philosophy in the Employees First Customers Second (“EFCS”) value zone.

1. PERSONAL USE OF SOCIAL MEDIA

The following principles provide guidance when engaging in personal or unofficial online activities:

**Abide by HCL policies** - To the extent personal online activities may reflect upon or otherwise impact HCL’s business, all employees must adhere to the HCL Code of Business Ethics & Conduct, as well as all other policies including but not limited to, policies concerning harassment, intellectual property and protection of confidential information. Be aware of conflicts that may arise from taking strong positions online that are contrary to the Company’s interests. Employees should remember that any information that is shared online instantly becomes permanent and public.

**NEVER disclose or share any non-public, sensitive or confidential information about HCL** such as the following (which is only indicative and not exhaustive)

- **Do not share any information pertaining to the number of employees** across verticals, sub-verticals, specific services and countries (This is only permissible at Software Services, Infra, BPO and consolidated Company level)
- **Do not share any information pertaining to the number of customers** across verticals, sub-verticals, specific services and countries (This is shared only at Company level)
- **Do not share any information on number of projects or size of projects** across verticals, horizontals or geographies (This is not permissible at any level)
- **Do not reveal any pricing and fees details** (This is highly confidential. Not to be shared at any level)
- **Do not share any customer details** – Name, size of deal, types of services, delivery model etc should not be disclosed *without obtaining consent of respective customers and HCL*. Customer engagements, deals, relationships, tie ups are disclosed with prior approval in the press releases/investor releases
- **Do not share any information on revenue segmentation and revenue growth** by verticals, sub-verticals, specific services and countries. (This can only be shared only at Company level). 3 types of valid segmentation for Company's total revenues:
  - 5 service lines - EAS, ERS, Infra, Custom Apps and BPO
7 verticals - BFSI, Manufacturing, Telecom, Healthcare, Retail, MPE and Public Service - E&U
3 Geographies - US, Europe and APAC

All the above points hold for social media participation from any business unit / corporate function as well.

1.1 Personal Accountability
You will be held accountable if your activities harm HCL’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.

1.2 Perception is Reality
In online social networks, the lines between public and private, personal and professional are blurred. Just by identifying yourself as a HCL employee, you are also instrumental in creating perceptions about HCL in the eyes of our shareholders, customers and the general public. Do us all proud. Be sure that all content associated with you is consistent with HCL’s values and professional standards.

1.3 Raise Internal Awareness
You can help HCL stay aware of how it is being perceived in the social media space. If you encounter positive, negative or inaccurate remarks about HCL in the social media space and believe that they deserve attention, the same should be shared through whistleblower@hcl.com. This will help HCL to improve and take appropriate action.

1.4 Be Aware of the Broader Audience
HCL 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 HCL related content.

1.5 No Expectation of Privacy in Company Systems
HCL does not preclude personal use of its electronic items, provided it is reasonable and does not interfere with HCL’s business. However, if you choose to use HCL’s systems for personal online activities involving social media or otherwise, such activities shall not be considered
private and take note that HCL reserves all rights to access, review, restrict, monitor, record, scrutinize or otherwise manage these online activities or the content therein at any time.

1.6 Interaction with Media/Journalists
Only authorized spokespersons/teams nominated by corporate External Communications (EC) team are allowed to interact with media on behalf of HCL. Other than the authorized spokesperson/s, any employee wanting to interact with the media should seek permission from EC team, clearly stating the need and objective of the interaction and get the content/information duly approved by the EC Team. Adherence to ‘Media Relations Policy’ is a MUST for any interaction with the media.

2. SOCIAL MEDIA USAGE ON BEHALF OF HCL
Participation in social media is an excellent way for HCL to interact with the broader community in real-time. If not done in a careful and responsible manner, the Company or employee/s could suffer loss of reputation, loss of / inability to obtain Intellectual Property (IP) rights such as copyrights, patents and trademark rights, security law violations and/or saddle with other consequences.

2.1 Who is responsible for Official Representations on behalf of HCL?
Only designated senior HCL leadership and management, designated SPOCs from various business units and corporate functions are authorized to represent HCL on external/digital platforms and forums. If any team/unit intend to open an official channel/handle any of the social media platforms, it requires prior written approval from the Digital CoE and LOB Head.

2.2 Basic Rules for Online Representatives
- You are responsible for what you post.
- Keep in mind that you are speaking at all times as a representative of HCL, representing the interests of the Company and you should ensure that your affiliation with HCL is clear and transparent. Before communicating on behalf of HCL, be sure to disclose your name and affiliation. Do not use aliases, misrepresent your relationship with HCL or otherwise attempt to mislead the audience.
- If you are engaging endorsers (and other third parties authorized to engage in social media on HCL’s behalf), you must ensure they disclose their relationship with HCL if they are in any way contracted, compensated or seeded by HCL.
3. PROTOCOLS

The following protocols are applicable to all employees, contract workers or other representatives of any kind affiliated with HCL:

3.1 Corporate Policies, Review and Oversight

Traditional advertising laws apply to all media, including social media. Information should be truthful and not potentially misleading. Claims about the Company 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 HCL’s brand guidelines.

3.2 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, sensitive or confidential information including HCL Information.

HCL Information includes, but is not limited to, existing, new / future services or commercial availability/pricing, financials – either actual or projected, Company plans, news, internal memos or other private content, any information about litigation or other legal matters and proprietary data. You cannot engage in dialogue about new products/services that have not been formally announced.

Further, refrain from commenting on rumor or speculation about any aspect of HCL’s business both in India and globally including our competitors or others in the industry.

3.3 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).

Usage of all HCL and third party IP (including without limitation, content such as music, video and album art, trademarks, product images and trade-names and likenesses of individuals) should be properly authorized.

Do not reveal personally identifiable information about others unless - (1) you have cleared it with the Digital CoE team; (2) you have been given prior written permission by the individual(s); and (3) you are revealing such information only to the extent permitted and required for the purpose of transparency and without violating the applicable law. Personally identifiable
information means "any information that relates to a natural person which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying that person".

3.4 **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.

3.5 **Write What You Know**
Make sure you write and post about your areas of expertise, especially as related to HCL. If you are writing about a topic that HCL is involved with, but are not HCL’s deemed expert on the topic, you should make this clear to your readers. Please write in the first person. If you publish content on a website that is not owned by HCL teams, please use a disclaimer mentioning that your postings on the respective site are your own and does not necessarily represent HCL's positions, strategies or opinions. Always remember that you are personally responsible for your content.

3.6 **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.

4. **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:

4.1 **Guidelines for Blogs**
**DOs:**
- Employees are allowed to have their personal blog
- Employees can identify HCL as their employer
- Employees can share web pages link from [www.hcltech.com](http://www.hcltech.com) in posts as references
- Employees should only blog about their area of expertise, if representing HCL
**DON’Ts:**
- Employees are not allowed to create any blog on behalf of HCL or any of its service lines, vertical, or any sub unit, unless approved in writing by their LOB Head and Digital CoE team.
- Do not criticize HCL’s competitors either in your personal or competitor’s official blogs.
- Any conversation / interaction with customers should be immediately intimated to their Line Manager / LOB head / Digital CoE.
- Do not post or reveal details about HCL’s customers’ information, engagement, deals, revenue & headcount information etc, unless authorized or if the information is already in public domain through proper channels from HCL.
- Employees should not use HCL as their First Name/ Last Name in their personal profile.

**4.2 Guidelines for Micro Blogging Sites – Twitter**

**DOs:**
- Employees are allowed to have their personal handles on Twitter.
- Employees can identify HCL as their employer on Twitter.
- Employees can share web pages link from www.hcltech.com while tweeting as references.
- Employees should only tweet about their area of expertise, if representing HCL.
- Employees may follow @hcltech (HCL Tech’s official Twitter handle) to get the latest tweets in their Twitter timeline. Please refer to the list of HCL profiles on social media channels.

**DON’Ts:**
- Employees are not allowed to create any handle on behalf of HCL or any of its service lines, vertical or any sub unit, unless approved in writing by their LOB Head and Digital CoE.
- Any conversation / interaction with customers should be immediately intimated to their Line Manager / LOB head / Digital CoE.
- Do not criticize HCL’s competitors on either your personal or competitor’s official Twitter handle via @ responses/ direct messages.
- Do not post or reveal details about HCL’s customers’ information, engagement, deals, revenue information, project headcounts etc, unless authorized or already in public domain.
- Employees should not use HCL as their First Name/ Last Name in their personal profile.

**4.3 Guidelines for Social Networking Sites - Facebook/ Myspace/ Orkut**

**DOs:**
- Employees are allowed to have their personal profile on Social Networking Site.
- Employees can identify HCL as their employer on Facebook.
Employees can share web pages of hcltech.com to their profile using the ‘Share on Facebook’ widget available on the website

Employees may “Like” the official HCL page on Facebook to get latest updates. Please refer to the list of HCL profiles on social media channels.

DON’Ts:
- Do not create pages for HCL/ Associated Line of Business on Facebook. This is currently allowed only to HCL’s Digital CoE team.
- Do not criticize HCL’s competitors or involve in promoting HCL’s identity on competitor’s official pages on Facebook
- Do not post Wall posts/ photos/ videos in personal profile pages on Facebook that may contain negative remarks on HCL or confidential information about HCL
- Employees should not use HCL as their First Name/ Last Name in their personal profile
- Do not post or reveal details about HCL’s customers’ information, engagement, deals, revenue info, project headcounts etc, unless authorized or already in public domain

4.4 Guidelines for Professional Networking Sites - LinkedIn

DOs:
- Employees are allowed to have their personal profile on LinkedIn
- Employees can identify HCL as their employer on LinkedIn and use their functional designation
- Employees can join official HCL groups and Company page on LinkedIn
- Employees can share web pages of official web properties on their profile using the ‘Share on LinkedIn’ widget available on their profile page setting

DON’Ts:
- Do not create groups about HCL/ Associated Line of Business/ Industry on LinkedIn. This is currently allowed only through HCL’s Digital CoE team
- Do not falsify your designation at HCL
- Do not criticize HCL’s competitors on various topics posted by the competing companies’ groups/ Company pages
- Do not post or reveal details about HCL’s customers’ information, engagement, deals, revenue info, project headcounts etc, unless authorized or already in public domain
- Do not use HCL as your First Name/ Last Name in your personal profile
- Avoid joining unofficial groups containing HCL’s name as misnomer
4.5 Guidelines for Photo Sharing Sites – Flickr/ Picasa

**DOs:**
- Employees are allowed to have their personal profile on photo sharing sites like Flickr, Picasa, etc.

**DON'Ts:**
- Do not create any account representing HCL or your LOB/ vertical/ unit without written permission/ approval from Digital CoE team/ LOB Head
- Do not share images owned by HCL without prior written permission from your line manager/ Digital CoE team.
- Do not share HCL office / infrastructure pictures.
- Do not share pictures of confidential content owned by HCL/ customers/ clients
- Do not share print screen images containing confidential information about HCL/ customers/ clients
- Do not use HCL as your First Name/ Last Name in your personal profile

4.6 Guidelines for Document Sharing Sites – Slideshare/ Docstoc/ Scribd

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

**DON'Ts:**
- Do not create any account representing Company or your LOB/ vertical/ unit without written permission/ approval from Digital CoE team/ LOB Head
- Do not share any documents containing content owned by HCL, unless authorized or already in public domain through proper channels from HCL
- Do not share any Brochure/ Case studies / Whitepapers / Collaterals available that require user details for downloading the same from HCL corporate website (http://www.hcltech.com)
- Do not share confidential internal process/ client documents like New Business Models, Frameworks, etc. pertaining to HCL’s business

4.7 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 may subscribe to the official HCL channel (http://www.youtube.com/hcltechtube) to receive the latest video updates from HCL.

For publishing any HCL-related video on the official channel, please get in touch with the Digital CoE team

DON'Ts:

- Do not create any video channel/ account representing the Company or your LOB/ vertical/ unit without written permission/ approval from the Digital CoE team/ LOB Head
- Do not share any video containing content owned by HCL, unless posted on HCL official YouTube channel
- Do not post videos that have reference to HCL without prior written approval from the Digital CoE team
- Do not share confidential videos like internal training, customer visits, etc.
- Do not share any videos of HCL office / infrastructure / facilities.
5. BREACH OF POLICY

HCL considers this policy to be extremely important and evolving especially when social-media issues faced by employer/s continue to change and develop every day. If an employee is found to be in breach of this policy, disciplinary action would be initiated which may include dismissal from the employment of HCL, 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 regardless of whether HCL’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 HCL.

Employees have an ongoing duty to report any known violations of this policy by any other employees at whistleblower@hcl.com. HCL considers the duty to report to be a critical component of its efforts to ensure the safety of its employees and to preserve its reputation and goodwill in the community. Any suspected breach of this policy should be immediately reported to the employee’s reporting manager and employee shall be given an opportunity to show-cause for his/ her action. Any employee who fails to report any conduct that reasonably appears to be in violation of this policy may also be subject to disciplinary action for such failure.

Any employee suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details to the panel conducting the investigation.

Investigation Process

- All such matters get referred to an Ethics/ Investigation Committee especially constituted for this purpose comprising of Risk Officer, Compliance Officer, Legal Personnel, Digital CoE, HR and Administration personnel
- The Committee must undertake a preliminary assessment of the complaint/ suspicion/ incident
- For detailed investigations, the Committee may form a team of personnel (in-house/ external service provider) with the required skill set (knowledge, expertise, authority, etc.) for the investigation. The investigation team would have a reporting responsibility to the Committee
- The Committee will decide on the appropriate action based on findings from the investigation.
In certain circumstances, breach of this policy may be considered gross misconduct resulting in immediate suspension from service till completion of investigation and immediate termination of employment or payment in lieu of notice if proved guilty.

Any legal action initiated against an employee by a third party for violation of such third party’s proprietary rights or causing any damage to such party’s reputation or interest(s) either commercial or otherwise, or for any other act or omission may be a ground for a legal action to be initiated against such employee, shall be a ground for HCL to take appropriate disciplinary action against such employee and such employee shall be obligated to indemnify HCL for any action that such third party may initiate against HCL by virtue of such employee being in employment of HCL.

6. LOCAL LAW TRIUMPHS

In case of any conflict between this Social Media Policy and any local laws and/or regulations, including professional obligations, the local laws and/or regulations will prevail and must be followed rather than this Policy to the extent of such conflict. However if the local practice or custom varies from this policy, we expect you to follow this policy.

7. PERIODIC AUDITS

Internal Audit (IA) team should perform risk assessment on the degree of social networking available to the employees. This assessment will help Company to streamline blocking of websites. IA team needs to conduct quarterly audits on existing internal controls, identify gaps, if any and provide suggestions to overcome them.