
CORPORATE COMMUNICATIONS POLICY 2022-2023

1. Objective

To put in place a decision making process for the Communications department to undertake any activities in Advertising (ATL & BTL)*, Social Media, Corporate Gifting, Print Production and Public Relations at National as well as Regional levels.

- i) Ensure all branding / publicity activities are carried out at competitive pricing, without compromising on quality.
- ii) Prevent the improper use or premature disclosure of confidential material information.
(SOP: should have an Non Disclosure Agreement (NDA) with all vendors)

2. Goals of Communication Policy

- i) To reinforce strong corporate reputation through high degree of transparency and consistency in communication with stakeholders
- ii) To disseminate timely communication with stakeholders - with clarity, coherence and credibility (clearly state timelines).
- iii) To disseminate information through the official website of the Bank on a real time basis.

3. Guiding Principles of Communication

- i) From communication perspective, the Bank includes as its stakeholders the Regulator, Government, Investors, Customers, Employees, Suppliers/Service providers, Trade Associations, Civil society Groups, Public and society, at large.
- ii) Bank aims to inform, persuade and/or involve all stakeholders in the activities and growth of the Bank through sustained, consistent and relevant messages using judicious mix of both external and internal communication tools.
- iii) The guiding principles of the Communication Policy of Union Bank of India in the context of its goals are transparency, comprehensiveness, relevance and timeliness with a view to make the stakeholders aware about the Bank's various activities, products & services, financial market, regulatory & compliance matters relating to the Bank.

*ATL - mass media used to promote brands and reach out to mass target consumers.

BTL - media used to reach out to specific consumer instead of mass audience.

- iv) The content of communication in the Bank comprises product information, customer service initiatives of the Bank, issues relating to customer service, market related information and matters relating to regulatory compliance.
- v) Communication is primarily focused on issues of importance to Union Bank of India, in particular and banking, in general.
- vi) Bank endeavors to communicate with its diverse stakeholders preferably in their language, and certainly in Hindi, English and regional languages (if required).
- vii) Bank endeavors to place all relevant information in the public domain so as to discourage individual seeking information on selective basis.

4. Annual Strategy

The Corporate Communications will prepare the annual strategy, the execution plan and proposed budget for the same. The various media/publicity heads for which budget allocations are to be made as per administrative convenience are as under:

- Advertising in :
 - Print Media (dailies, magazines/supplements/souvenirs etc.)
 - Electronic Media (TV, Radio), Digital / Social Media
- Outdoor Media
 - Hoarding and Below the Line activity.
- Rural Publicity (incl. Financial inclusion)
- Organizing Events :
 - Media conferences, Product Launches, Announcement of new Initiatives, Foundation Day for customers and staff and also similar events for (HNI customers/stakeholders, AGM/EGM), etc.
- Sponsorship of :
 - Events, fairs, conclaves, conferences, college festivals, sports activities etc.)
- Allocation of Budget to FGMs (Print, Sponsorship, Rural Publicity, OOH & Give Away)
- Gifts/ Giveaways / Souvenirs
- Non Publicity expenditure :
 - Tender/public notices, recruitment ads, financial results, other events like press meet / conferences etc.
- Production charges for Audio Visuals, Printing & Mounting charges etc.

The allocation of the Publicity Budget and Inter changeability in the allotted budget under various heads will be approved by the Managing Director & CEO or in his absence by the Executive Director, duly recommended by the Publicity Committee or Head of Corporate Communications.

5. Operational Practices

5.1 Spokesperson

- i. The Managing Director & CEO and Executive Directors of the Bank are the spokespersons for the Bank. Additionally, depending upon the issues/events the Managing Director & CEO may authorize any of the Executive Directors / General Managers / Heads of Overseas Territories to speak on behalf of the Bank.
- ii. The CGMs / Corporate General Managers / Head of verticals may speak on behalf of the Bank on published data about the respective verticals, in response to queries from media (print / electronic) on ongoing projects / campaigns by various media agencies. Comments / observations should not be given on futuristic issues / views.
- iii. General Manager (Corporate Communications) may coordinate with other vertical heads to interface with media / prepare Media release* for product launch, new initiatives, etc. based on published facts, with restrictions on any type of futuristic issues / views.

* Media release to be disseminated only by Corporate Communications Dept.
- iv. Bank's Zonal / Regional Heads would be speaking only within the scope of published data of their respective Zone/Region. No comments to be made on futuristic issues / views on the following :
 - Corporate Policy
 - Financial Results
 - Management structure / Change
 - Future plans of the Bank
 - Government Policy
 - Any other information that is not in public domain
- v. No other employee is allowed to talk to media unless he/she is authorized media spokesperson. A strict disciplinary action will be taken against the person if not adhering to this policy.
- vi. Bank's spokespersons shall endeavor to use an approved script for all public presentations, designed or intended to disclose material information about the Bank's financial performance, results of operations.
- vii. For media interactions male/female spokesperson must wear formal dress.

5.2. Investor Relations

- i) The Bank's Investor Relations (IR) function is guided by a dedicated team primarily comprising the Managing Director & CEO, Executive Director (In charge of investor relations) and the Chief Economist.
- ii) The team shall interact with Bank Analysts, large domestic institutional investors, rating agencies and other investors with an objective to impart a better understanding of Bank and its strategies and thereby help getting a fair market valuation for Bank's securities and a climate of favorable opinion.
- iii) The team shall provide guidance on emerging macroeconomic parameters, banking & regulatory outlook through quarterly presentations.
- iv) The team shall also quickly provide information on any major change in important policy variables like deposit/lending rates or change in the composition of the Bank's top management or Board of Directors to Investors; Analysts and Media.
- v) The Bank shall conduct Analysts Meet every quarter after the announcement of its quarterly financial results. Besides making a comprehensive presentation, the Bank's Top Management shall directly interact with Bank Analysts and address their queries and concerns upfront. During such interaction, the Bank's Top Management may also provide guidance on the Bank's likely future performance in a conservative fashion by appropriately factoring-in risks emanating from domestic & global environment.
- vi) The Bank shall also endeavor to provide live webcast of such Analysts Meetings covering presentations and interactions. Bank will also upload the relevant information on the website as and when appropriate.
- vii) Selective disclosure of material which is not in public domain is against the Bank's Policy. If the Bank wishes to disclose non-public material information; it will strive to do so in a manner that will simultaneously result in for widespread dissemination to all the stakeholders.
- viii) If the Bank discovers verifiable facts that material non-public information has been disclosed other than through simultaneous widespread dissemination, it will promptly disclose the same information in a manner calculated to result in timely, widespread dissemination of such information. If an unintended release of material non-public information occurs, the Bank will promptly disclose the same information or similar information to the public in compliance with then-applicable law.

6. Brand-Guidelines

In order to ensure consistency in visual communication of Union Bank of India brand, the Bank has set guidelines which broadly cover the following aspects of Bank's visual identity:

- Definition, type and application of Union Bank of India logo - Corporate stationery items and various application forms.
- Advertising in print media and Bill boards
- Print applications such as Posters, brochures and leaflets
- Electronic media - External fascia signs such as branch/ATM signage
- Social Media / Digital Media / Internet
- Interior signage of Branch/ATM - identification signs, direction signs, statutory signs, etc.
- Other applications such as danglers, banners, T-shirts, Caps, etc. The Brand Guidelines shall be made available on Bank's intranet site for information of staff and implementation at all levels.

7. Major Communication Tools / Channels :

Print Media / OOH Media / Electronic Media (TV / Radio), Social Media, Digital / Internet Media, e-paper, e-Magazine, Wire, Websites, Conferences, Meets, Camps etc.

7.1 Advertising

Bank shall use advertising to promote its products, services and corporate brand values through judicious mix of media vehicles including print, electronic, and web etc. The Business Verticals shall coordinate with Corporate Communications for use of this tool for the benefit of the Bank.

Types of advertising;

- a. ABOVE THE LINE (mass media is used to promote brands and reach out to the target consumers.)
 - Television
 - Radio
 - Print (Newspapers, Magazines), e-paper, e-magazine, wire
 - Social media
 - Digital media

b. BELOW THE LINE (seeks to reach a consumer, instead of a mass audience, directly rather than through an intermediary, such as with a commercial during a television show. This type of advertising is often centered on specific localities and is used to promote products that a consumer wants to see in person)

- Contextual text ads
- Vertical banners
- Email marketing
- Tele marketing
- Events / Activations

The publicity media are varied in reach, cost and availability. The traditional media available are as follows:

- Print Media includes Dailies, magazines (weekly, bi-weekly, monthly, periodicals, etc.)
- Electronic Media includes DD, Satellite Television, Digital and Cinema, OTT platform
- Out of Home Media
- ATL (above the line) Activity like hoardings, kiosks, bus stops, neon signs, railway platform displays, train display, gardens' maintenance etc.
- BTL (below the line) Activity like activities in malls, cinema halls, fairs, colleges etc.

In addition to above media options, Bank may also make use of any other new and emerging publicity media, if it meets the overall communication strategy.

The broad guidelines for selection of media are enclosed as per Annexure.

7.2 Public Relations

The Bank's communication strategy will also include leveraging of cost effective opportunities for building brand image through Media release, Media interviews and coverage of various events and activities of the Bank. This will be undertaken with a focus to promote the performance of the bank and promote its overall initiatives in the areas of product services and reach.

In keeping with the guidelines of the regulators/stock exchanges no official of the bank will be permitted to make any forward looking statement or comment on the policies of the Bank.

7.2.1 Press Release

All media releases such as covering policy announcements such as change in rate of interest; introduction/phasing out of products/services; overseas expansion; launch of national/international campaigns; CSR/Financial Inclusion initiatives, customer service initiatives at national/international level, regulatory/compliance related matters and other information of national/international importance, are centrally issued by the Corporate Communications of Union Bank of India.

Media releases covering announcements of local issues, campaigns and/or events within the jurisdiction of respective Zones to be issued under authority of the Zonal Head. Field General Managers and Regional Heads can have local press meet for product launch, branch inauguration or events coinciding with announcement of quarterly results of the bank. Press Release, if any, to be released for such events shall be approved as per guidelines (stated at para 5.1(iv) of this policy).

7.2.2 Media/ Sponsorship Activities

Bank shall use the following modes of communication to clarify and inform the stakeholders, in general and media, in particular.

- Media release
- Web-site, Social Media
- Speeches - Notifications
- One-on-One clarifications
- Briefings/interviews by top management
- Interviews with Managing Director& CEO/Executive Directors

All media relations activity should be strictly coordinated by the communications department at all times. This will help ensure consistent information sharing and avoid selective disclosures.

In case of unavoidable situations, where media reaches out, one must use viable discretion to answer keeping the best interest in of Union Bank of India in mind. If unsure, they must decline to provide any comment.

(For example: We are not the authorized spokesperson to comment. Our Corporate Communications team will revert to you at the earliest possible.)

This is to prevent any damaging statement made in a recorded conversation which can hurt Bank's reputation and communication efforts in building the same. **In case of**

any such situations the concerned officials should connect to the Corporate Communications immediately.

7.2.3 Crisis Management and Response Plan for adverse reputation events

- The MD & CEO, being spokesperson of the Bank or any of the **designated** Executive Directors or General Managers or Heads of Overseas Territories so authorized by MD & CEO, to clarify and disseminate the true and fair stand of the Bank or any adverse reputation event through Media Conference, Media Releases using any print, electronic or other media vehicle as deemed fit for bringing to the knowledge of all stake holders.
- The General Manager (Corporate Communications) may speak on behalf of the Bank / issue media releases / media related communications in consultation with the Top Management (MD & CEO / Executive Directors) and different verticals of the Bank to the extent of published data.
- Bank will also endeavor to immediately disseminate the true, fair and adequate clarification through its own website.
- To safe guard against erosion of our market capitalization on account of such adverse event; true, fair and adequate clarification / intimation to be filed with both the stock exchanges, i.e. BSE Ltd and National Stock Exchange of India Ltd. by the Company Secretary so as to bring it to the notice of all stakeholders including shareholders. Such intimation would also be required in terms of respective listing agreements signed by our Bank with the Stock Exchanges.

7.3 Internet

The official web-site of the Bank is www.unionbankofindia.co.in. The bank endeavors to make the web-site up-to-date and reader-friendly. The website is the central platform for all external information that bank produces.

7.3.1 Internal News-Letter/Magazine

Bank has in-house magazines and news-letters for internal circulation and communication/ intranet as well for exclusive usage of employees.

7.4 Print Production

Types are;

- Offset,
- Flex,
- Digital, Brochures,
- Banners,
- Handbills etc.

Brochures, banners, handbills, etc will be designed, developed and released by Corporate Communications, in close coordination with business verticals/field executives. All such releases will be strictly in conformity with the design duly approved and released by Corporate Communications after following due process of internal approval including Publicity Committee/ED/MD&CEO as necessary.

Corporate Communications under the policy will undertake release of brand manuals wherever standardized implementation at the field level is envisaged.

The Bank shall maintain uniformity in Bank's corporate colors, design etc for display of Bank's publicity messages through outdoor media. Minimum 10 ounce standard quality Flex & 3M/LG/Avery India Vinyl should be made use of for attractive display of Brand image of the Bank.

8. Corporate Gifting

- Bank may procure various Gift items with Banks name/Logo printed for distribution to the valued customers/dignitaries, which adds to the Bank's Publicity mileage. As far as possible, it should be ensured that branded /quality gift items are made use of for distributes as Giveaways / Souvenirs as it directly impacts the image of the Bank.
- Corporate Communications may procure items to be given to FGMOs/ROs for standardization, quality and economy. However, as the requirement of Gifts/Giveaway items may vary as per geographical conditions and local requirements, Budget may be allotted to FGMOs and ROs for their local consumption.
- For procurement of Souvenirs items, Collaterals etc. normal procedure as mentioned in the procurement manual may be followed except in the following cases:
 - Procurement of any unique item with specific or pre specified design or designed to order and manufactures/supplied by particular authorized vendor/seller.
 - Procurement of Souvenirs items of a particular/reputed Brand from authorized showroom/ authorized dealer.
 - Procurement of specific items at a very short notice.

9. DIGITAL MARKETING & SOCIAL MEDIA:

9.1 Introduction to Social Media:

Social Media is a “group of Internet Based applications build on ideological and technological foundation of web 2.0, and which allows interaction among people at a platform where they can express, create, share or exchange information and ideas in virtual communities and networks”.

Social media is the future of communication with enhanced experience of information sharing. This form of media makes the transfer/sharing of text, photos, audio, video, and information in general, increasingly fluid among internet users. Social Media has relevance not only for regular internet users, but business as well.

Social Media Platforms like Twitter, Facebook, YouTube, Instagram, Google+, blogs and LinkedIn have created online communities where people share all kinds of information like personal information, ideas, views, etc as they desire with other members. The result is an enormous amount of digital information readily available on the web which can be easily shared, searched, promoted, disputed, and modified.

9.2 Objective:

9.2.1 Brand Awareness

At present, over half of the world’s population is on social media platforms like Facebook, Instagram or Twitter, where Bank too can reach new and highly targeted potential customers. The impact of widespread consumer adoption of social media is hard to ignore. With the explosion of social media usage around the world, social media websites have become an important platform for businesses to engage with customers, prospects, employees, and candidates. In today’s volatile economy, credibility is a real issue for banks, Financial institutions feel a constant pressure to regain and improve customer satisfaction and trust. From professional networking to entertainment, social media have permeated most aspects of our lives.

Banks can build communities & create audience with several communities aggregated on relevant interest/topics by products, by financial need, by non-financial need, by customer segment etc.

Users can be engaged by ongoing business interactions on social media through Q&A sessions, offline caring after online interception, customer care, contests to get influencers, educating videos, entertaining apps/ videogames, virtual branch,

organizing online events etc. The communication can be through text posts, pictorial message, uploading video, attractive wallpapers etc. Business drives can be started to achieve results integrating social media as an engaging layer by product development, viral initiatives, location-based initiatives etc.

Listening users to collect relevant feedback to feed other key components and time initiatives, understanding position (brand and products), leveraging influencers, addressing customer needs and complaints with regard to branch, product, initiatives, customers etc. can be achieved.

Social Media can be used to know what people are saying about a brand, gaining competitive intelligence, creating buzz for campaigns, improving search engine visibility and increasing prospects.

9.2.2 Social Media platforms objectives

Bank has official presence on below mentioned social media channels with the following objectives:

- **Facebook** - For creating awareness around information published by the bank and interacting with the audience via visually rich and engaging content.
- **Twitter** - For operating as a real time channel for broadcasting offers, new developments and initiatives, and for engaging influencers, as well as responding to customer care queries.
- **YouTube** - Creating interesting brand videos with a focus on new products, offers, campaign stories to engage the audience and educate them. Also promoting YouTube uploads on other social media channels to create interaction and awareness among our followers/subscribers.
- **Instagram** - To create brand image among our young and other Instagram audience by promoting eye-catching and informative creatives and short videos.
- **LinkedIn** - To build a strong presence in banking industry and boost our reach by posting contents and blogs on our bank's recent activities time to time.

9.2.3 Website traffic

Social media posts and advertainments are key ways to drive traffic of our corporate website. Sharing contents with link from website to our social media handles is a great way to get traffic of corporate website. It helps people who want to learn more about Bank can do so with one easy click. While responding to comments on social media, bank can get attention from new people and drive traffic to website.

9.2.4 Generate Leads

Social media can be used for offering Bank's product to potential customers. Lead generation is such an important benefit of social media for bank to boost new/existing products to prospective customers. Nowadays Social media accounts are a critical part of Bank's product sales funnel through which a new contact becomes a customer. New offers by development, overall sentiment about existing or new products, collection of feedback about initiatives, interception of customer complaints and enriching customer profile by collecting customer interest is obtained.

There is no doubt that social media has irrevocably changed the way businesses interact with their clients, their employees and their stakeholders. For banks, the rise of social media signals a new dawn; an evolution that offers significant opportunities and challenges.

Bank's approach is to build a strategic roadmap for the future, and make the best use of opportunities available on Social Media. Various Analytics are being used for taking decisions towards the growth of the Bank, thereby remaining in line with the peer Banks.

9.3 Strategy for Social Media:

- Undertake Social Media Audit to identify target audience, influencers, Opinion makers and key stakeholders of Union Bank on social media.
- Identify via social media audit, the most popular social media platforms among prospect and existing audiences.
- Create strategy for integrating social media channels as well as promoting conversations, participation, partnership and contributions from target audience.
- Build the brand amongst target audience via digital channels and social media platforms.
- Create Content strategies, including editorial calendar, strategize and support events, launches and offers.
- Manage Online Brand reputation through customer response and crisis communications.

9.4 Social Media Governance:

The ownership of social media is with Corporate Communications (CC) under the project "*Union Connect*". However, the issues arising in the pages related to a particular vertical shall be referred and forwarded to the respective branch/

department/Social Media Nodal Officer of that vertical for resolution and taking necessary action.

Bank has outsourced Social Media management of its official handles for instant expertise and more scalability to better manage the exponential growth in its followers' base. Outsourcing social media shall produce more outcomes and leads, greater bandwidth for faster response to users' queries/complaints and better brand awareness with use of advanced and powerful digital marketing tools. Key areas of focus shall be Brand Management, Content Management, and Response Management on Social Media platforms etc.

Union Connect (Social Media) team working under Corporate Communications will coordinate with respective region/zone/vertical for resolution of any suggestion, grievance and valued feedback submitted by the outsourced vendor. In addition to above, the team shall monitor the entire gamut of Social Media Marketing, Content Management and Response Management, etc. Laptop and internet connection will be provided to all officers to review/monitor the social media handles regularly.

A social media committee of following vertical heads is formed to implement the social media policy, time to time review of the existing pages as well as new social media platforms.

- i. General Manager, Corporate Communications (CC) - Ownership of project.
- ii. General Manager, Digitization
- iii. General manager Information Technology (DIT) / Dy. General Manager (DIT)
- iv. General Manager, Risk Management Department

Union Connect team will monitor the outsourced vendor responding to all comments and actionable updates within 12 hours. In case, any grievance, lead, feedback or inquiry is received from users and team require information/response from relative region/zone/vertical, the response team will forward the same to the concerned region/ zone / vertical to get back the required action / information by next working day and the same will be informed to the outsourced vendor.

Union Connect team will monitor the page as being done hither to. The outsourced vendor will do deletion or suppression of negative content relating to the products/services. 24X7X365 moderation of comments, interaction and conversations to avoid any negative feedback or comments will be done by the outsourced vendor.

Posts that require a public reply can include positive responses to our posts, extra information and anecdotes, constructive and other criticism, In some cases e.g. grievances, this may involve a public acknowledgment of the message and an invitation to continue the conversation through Direct Message (DM) over the Bank's handle.

Bank understands its need to adopt social media in some form or other in order to stay competitive in the marketplace and remain relevant to its customers. Bank engages with users across social media channels through a mix of content and contextualized conversations, and cross promotes content while customizing messaging, medium and approach to focus on the specific audience. Further, educating and training Bank employees internally about social media initiatives from time to time shall be undertaken through instruction circulars. External classroom corporate training and online training will be provided to Union Connect team on Social Media Marketing (SMM) from training institutes.

9.5 Social Media Content Eligibility, Selection Of Content and Approving Authority:

The artworks to be posted on Bank's official pages/channels/handles are to be approved by Assistant General Manager, Social Media, Corporate Communications. Following contents will be posted on our Bank's Social Media sites:

- i. **Cover Photo** -The profile picture will be invariably the Bank's logo. Cover photo shall be developed by Social Media Agency (vendor) and may also be picked from our bank's official advertisement pictures, banners, posters, pamphlets etc released by various departments, which will be changed time to time as per periodical campaigns, and other relevant events.
- ii. **Write up on the Bank covering its History and profile** - The year of inception, Bank's founding principles, number of Branches and ATMs, Awards and accolades, clientele base, Bank ranking amongst peer Banks.
- iii. **Photo/Video Gallery** - Of various events like opening of Branches/ ATMs by Top Management, Bank's financial results, Foundation Day, PR-related events and all other events as decided by the Bank. Corporate Videos, Ads, Clippings of interviews or any video which gives mileage to Bank's image. Contents shared by various verticals/regions are to be approved by the respective Vertical Head for posting on Bank's official pages/channels/handles.

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- iv. **Special Offers / Campaigns in the Bank** - Special Festival Offers made by the Bank on various products, Cash Back Offer on usage of Debit Card/Credit Card for purchases, Marketing Campaigns with special features etc.
 - v. **Live Streaming**- Covering Bank's financial results, important events, product/service launches, etc. Live Streaming on social media for the proposed events are to be approved by respective vertical head.
 - vi. **Latest changes in the product features due to regulations / innovations**
The changes in norms, terms and conditions in our product features due to certain new regulations / innovations.
 - vii. **Financial Literacy** - On basics of Banking for the benefit of all classes of society, especially the younger generation.
 - viii. Bank's future Business plans, new product & services launch including digital products etc. and anything which the top management and or regulatory bodies directs to communicate to the stakeholders through this medium.
 - ix. **Artwork/Creative/Videos etc. are for:**
 - a. Advertisement and marketing of various products and services.
 - b. Awareness on cyber security, digital banking, financial literacy, nominations and other related services of banking.
 - c. Greetings for festivals, special days, occasions etc.

9.6 Responsible Usage of Social Networking Platforms (Guidelines and Code of Conduct for Employees as Social Media Users):

This policy outlines the standards required for staff to observe when using social media, the circumstances to monitor the use of social media and the related action in respect of breaches of the policy. Bank permits and encourages the participation on social media websites for personal usage by staff subject to certain conditions set out below. However, it must neither be abused nor overused. The following conditions must be met for personal usage to continue:

- i. Never disclose any commercially sensitive, anti-competitive, private or confidential information about the Bank or its employees, customers or business partners.

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- ii. When appropriate, employee as a user of Social Media, should disclose their relationship with the Bank in their online posts and refrain from speaking on behalf of the Bank when not authorized.
 - iii. If someone from the media or press contacts the employee about his/her social networking activities that relate to the Bank, he/she shall take necessary permission from the appropriate authority i.e. Vertical Head, Corporate Communications before responding.
 - iv. Employees should comment on our Social Media pages in personal capacity without harming the Bank's reputation and/or compromising on its integrity.
 - v. In case any employee as a social media user gives opinion, he/she may present a clear disclaimer that the content or opinion expressed is solely within his/her individual capacity and does not represent Bank's views, in any manner. Even in the absence of such disclaimer, the employee is personally responsible for what is posted online and should bear in mind that the said post will be available publicly for a long time.
 - vi. Do not upload, post, forward or post a link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content.
 - vii. Any staff, who feels that he/she has been harassed or bullied, or offended by material posted or uploaded by a colleague onto social media website, should inform HR department/Social Media Team. If same is found true, Bank may take appropriate action against that person as per Bank's Disciplinary Procedure. If necessary, such information may be handed over to the police in connection with a criminal investigation.
 - viii. It is strictly prohibited to create/promote any profile/group/community/page on any internet site by using the logo or name of "Union Bank of India". No staff should become member of any such group or community unless that is created or permitted by the Bank. Employees as Social Media users shall not create or become a member of any e-group, forums, Channels that indicates it to be an official group, forum or channel of the Bank. Employee as a Social Media user shall not use any references to the Bank in whatsoever manner which otherwise looks like an official statement/group of the Bank.
 - ix. Publishing rumors and/or internal and/or confidential information about the bank or related third parties on social networks (customers, suppliers, and
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collaborators) can have a negative impact on the bank's image and reputation and may lead to legal action against the issuer.

- x. Staff working at Verticals, Offices etc. are also to be noted that solution or any communication shall not be shared or communicated on any Social Media handles and it should be through official channel only. Violation of these guidelines shall lead to take action against erring officials as per Bank's norms.
- xi. All employees must follow some ground rules regarding information/opinion/views about the Bank on social media. These ground rules include but are not limited to following points:
- Duty to protect bank against malicious content/campaign: if an employee comes across any campaign/content which appears to be malicious and against the interest of banks, it is duty of the employee to deny such content and immediately report it to bank (Social media team) so that further action can be taken against such acts.
 - Duty to un-friend/off-connect with malicious content: when any employee comes across malicious content, after denying such content he/she should un-friend/off-connect with such user/friend/group/page who are spreading/supporting these malicious acts. If he/she comes to know that any of his/her colleagues is involved in such activity, he/she should report it to Social Media Team.
 - Duty to protect interest/reputation of Bank: it is duty of every employee to protect interest of bank while using social media platform.
 - Duty to maintain accuracy and confidentiality of Bank's offers/policies: While engaging in conversation related to bank, the employee must ensure accuracy and confidentiality. Employee must only post/comment details while he/she has deep knowledge about the product/topic. He/she must not (i) post/express any view or opinion on behalf of the Bank or by using official capacity of the Bank, (ii) publish any official information/circulars/memorandum/documents etc. which is meant for Bank's internal circulation only and are Bank's record and exclusive property (iii) disclose any other sensitive information on social media. Similarly, customer sensitive information such as account statement, TDS certificate, Cheque or FD images, Finacle Screen should not be posted on Social Media. However, there is no bar in sharing contents related to

appreciation/awards/accolades/felicitation/events etc which has the potential of enhancing the brand image of the Bank.

- Failure of complying with Social Media Policy will be treated as violation of service regulations of “Union Bank of India Officer Employees (conduct) Regulations, 1976 with all amendments” also called as “service rule book”. The same will be applicable for other staff including but not limited to award-staff, clerical staff, vendors, trainee, internal or external consultants etc.
- xii. The employees as Social Media users must maintain social etiquette while using social media sites and keep professional and personal lives separate. Staff members should ensure that their personal emotions/frustrations/anger/grievances are not to be expressed on Bank’s official social media channels/pages/handles or on any internet site/social media. The language used should be professional and must be a healthy communication.
- xiii. Do not post any adverse comment against management of the Bank or the business processes or strategies of the Bank or policies of the Bank on any internet site/social media.
- xiv. Do not disclose any information such as address, telephone / mobile number, bank account number, email ids and passwords, etc. about any employee or customer of the Bank on any internet site/social media.
- xv. Do not engage in collusive behavior on any internet site/social media, with Bank’s competitors or employees.
- xvi. No employee shall canvass for any donation, lottery or third party marketing/business promotional activities/affairs in Bank’s name on any internet site/social media.
- xvii. No employee of the Bank shall express any view on any internet site/social media about the working of Union Bank of India or the business of Union Bank of India or generally about Union Bank of India or any of its officials without obtaining prior approval from competent authority (Vertical Head, Corporate Communications).
- xviii. Employee of the Bank should refrain from commenting on futuristic issues/views on the following:
 - Corporate Policies

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- Financial Results
 - Management structure/change
 - Future plans of the Bank
 - Government policies on any internet site/social media.
- xix. Do not politicize professional discussions.
- xx. Comment should not be made or response should not be given in relation to matters that are sub-judice, draft legislation or relating to other individual.
- xxi. All information posted by the Bank including but not restricted to brand names, features, colour schemes etc. may be safeguarded by trademarks, copyright and other legal measures available to the Bank. Employees should not copy, amend or in any other manner use the content posted by the Bank without prior written permission of the Vertical Head, Corporate Communications.
- xxii. Employee as a Social Media user, shall not use Bank’s Logo, Name “Union Bank of India” or any references to the Bank (Corporation Bank and Andhra Bank) even name used in phonetic in whatsoever manner which otherwise looks like an official statement/group of the Bank.
- xxiii. Sharing the content posted on the Bank’s Social media platforms/handles in its Original Format is permitted. However, no person, legal or otherwise has the right to use for monetary purposes, change, alter, modify, amend, revise, publish, translate, copy or otherwise distribute any part or content uploaded on the Bank’s social media channels, or link any other Bank’s social media channels or other website to this page, without prior written permission from the Vertical Head, Corporate Communications except as specifically enabled by the functionality of the social media channel.

Breach of this policy may be dealt seriously and may be treated as gross misconduct. All staff is responsible for their own compliance with this policy and for ensuring that it is consistently applied/maintained.

The employees as Social Media users shall acknowledge and respect copyright laws and other applicable laws such as IT Act, Privacy Laws etc.

9.7 Digital Marketing:

Bank has outsourced the services for various Digital Marketing activities to engage with a larger audience and promote Bank's products/services/offers etc. The vendor shall manage the overall Digital Marketing campaigns across all digital channels. The outsourced vendor shall understand the Bank's target audience and build creative & content, media selection, drive promotions to maximize the impact of the Digital Marketing.

All digital marketing efforts through Campaigns/ brand awareness programs, Search Engine Optimization (SEO), Search Engine Marketing (SEM), Email & SMS Marketing, Display, Organic and Paid Social Media & Affiliate marketing, Influencer Marketing, Social Media Marketing, Mobile Marketing, Digital Content Marketing & Online Reputation Management including developing overall product and brand strategy, content management, blogging, etc. related to digital and social media marketing space.

i. Digital Media Plans:

Targeting audience, namely existing and potential customers, for marketing of Bank's products and services etc as well as enlarging brand awareness through the most efficient and cost-effective platforms. Creating media plans with 360-degree digital coverage including various forms of digital marketing techniques that may be available/ evolve with time.

ii. Designing campaigns/ strategies:

Based on the business requirement of the bank, campaigns shall be implemented effectively through various platforms including search engine, social media, content, Email/SMS & other forms of digital marketing techniques/ platforms including OTT, PR, etc that may be available / evolve with time.

iii. Influencer Marketing:

Partnering with Bloggers/Influencers/Celebrities for creating buzz around the brand and to influence social signals.

iv. Search Engine Marketing (SEM) & Search Engine Optimization (SEO):

Paid campaigns to increase the bank's presence on search engines and strengthen its digital footprint in the digital world by optimizing advertisement copy and landing pages for paid search engine marketing campaigns. Improve the webpage rankings of Bank's corporate website on the Search Engine Result Pages (SERPs).

v. Mobile Marketing:

Target the audience through their mobile, tablet, laptop and other handheld devices via websites, email, SMS/ MMS, social media and app.

vi. SMS, WhatsApp & Email Marketing:

Create brand awareness and promoting Bank's products / services / offers etc. for SMS, WhatsApp & mail marketing.

vii. Tie Ups with e-Commerce platforms (In-house activity):

Bank shall engage in tie-ups with various popular e-Commerce merchants from different sectors to increase our digital transactions, card usage & digital penetration. Bank shall compete with its peers and strengthen its hold in attracting and retaining its customers.

All digital marketing activities shall be finalized through negotiations based on the quotations received. The Negotiation Committee for tie ups and other Digital Marketing activities shall constitute of the following officials from Corporate Communications:

- i. Assistant General Manager - 1
- ii. Chief Manager - 2
- iii. Senior Manager - 1

Financial approvals for all Digital Marketing activities shall be taken from respective competent authorities.

9.8 Digital Public Relation (PR):

In the age of digital discourse, it is important for all corporate, whether in business to business segments, or business to consumer segments to manage their external information interfaces on social media. In addition to socializing the content of traditional PR via the social media channels, the engagement also envisages the planning, coordination and execution of the campaigns/events.

Creating own posts, press releases, photos and visuals would be used as ready posting material for social channels and assistance of bank's advertisement agencies would be taken for creating posts attractive with photo and videos.

Number of posts on all platforms will be decided as per publicity and digital marketing requirement on various occasions, campaigns and events.

Posts will be published based on the online traffic on social media platforms and shall target a larger audience.

To promote the brand better on all social media platform so as to make a considerable impact, sponsored ads will be placed in social media pages/handle, as these are repository of personal information of prospective customers.

Marketing on social media is targeted to follow and engage

- a. Follow
 - i. Government of India and Regulatory Bodies/Authorities e.g. RBI, DFS, PMO India, NPCI etc.
 - ii. Relevant people who are talking about the brand
 - iii. People who are talking about competitors
 - iv. People who are talking financial products
 - v. Identify relevant keywords and follow people
- b. Engage
 - i. Through relevant information
 - ii. Through offers
 - iii. Through attractive contests

Bank’s publicity materials like posters, banners, holdings etc will be printed with its official social media handles as mentioned below:

Platform	Handles
Facebook	facebook.com/UnionBankOfIndia
Twitter	twitter.com/UnionBankTweets
Instagram	instagram.com/UnionBankInsta
LinkedIn	linkedin.com/company/unionbankofindia
YouTube	youtube.com/c/unionbankofindiautube

Plug-in of social media platforms will also be provided on our website to increase our followers.

9.9 Social Listening Analysis:

Targeted social listening helps in identifying new prospects through monitoring actions and conversations of potential customers. This monitoring will help us in understanding the audience based on their preferences, behaviours and conversations. Also, examine relevant communities where the audience is active and join in on the discussions to provide valuable insights to gain credibility and earn valuable networking opportunities.

- The online conversations to find out who is talking and what they're saying (focus on the listening hubs).
- Where are the conversations taking place?
- What our competitors are doing on social media?
- What content resonates with the audience?

9.10 Measurement:

The outsourced vendor shall monitor Bank's performance on all digital platforms through various tools available in the market. Measurement of digital marketing, including social media data, is important to understand how the digital initiatives affect traffic and influence analytics. It will help to understand what the audience is looking for which will be important for us to formalize future strategy to engage the audience.

Social Media Listening helps in monitoring of millions of digital conversations to understand what customer are saying about the brand and industry online. It helps in discovering the opportunities and collect worthwhile feedback on products/services and competitors. The tool is best used to identify the customer's emotions for better designing of products and offers.

9.11 Risk Management & Mitigation:

The best way to mitigate a crisis is to respond at the flashpoint. Every brand must be prepared to respond with content in a variety of formats and circumstances. Risk mitigation will be integrated into the bank's risk management process.

Some comments are best dealt with on one-to-one basis where possible. As in the 'real' world, disagreements are best resolved away from the public gaze. Abusive users (staff) will be reminded of social media policy while those with genuine grievances will be referred to concerned vertical. In cases where number of tweets/comments across all our social media pages/handles pertaining to any subject in particular cross 50 in 30 minutes, then it will be escalated to GM/Head RMD.

It's common for conversations to develop between people posting on social media. This can also be a positive way of responding to statements by likes and thanks. In some cases there's no need to respond at all. These might include negative but inoffensive or irrelevant comments and discussions or debates that are resolved naturally amongst visitors on page.

Creating first level response mechanism cycle for all questions, inquiries and negative mentions will come handy in such situations. It will be extremely

important to have a manual dictating various scenarios and response template, as well as escalation scenarios, along with Turn Around Timelines.

In case of a serious complaint/potential escalation, customer care personnel to manage escalations. Malicious activity will be recommended for resolution management, as well as activation of the influencer network to mitigate and limit damage. The approach here might vary on case to case basis.

At the slightest hint of an online issue, the relevant department head or the designated crisis coordinator should be alerted. Make sure that the people internally are involved and the response mechanism is activated before the fire spreads far and wide.

Like the borderless nature of social media itself, various risks surrounding social media can be borne by multiple enterprise functions at the same time. Legal, compliance, regulatory, operational, public relation and reputational issues are at the top of the list of potential social media risks and need to be taken care by enterprise level risk policy. All such issues arising will be dealt by Corporate Communications, in consultation with concerned vertical.

The outsourced vendor handling these accounts shall be aware of the existence of fake identities purposefully trying to malign and provoke and use discretion while replying to such comments etc. If any malicious links are found, the outsourced vendor shall intimate Union Connect team. The team shall forward the same to Chief Information Security Office (CISO) for further action.

Hackers and identity thieves prey on the vulnerable and they easily swayed to steal passwords and get unauthorized access to accounts. We can stem the likelihood of these intrusions by using social media management tools.

The built in profanity filter feature in social media handles, if any, will be set as 'High', to prohibit comments with abusive terms that are posted in the page. Certain negative trigger words will act as a filter to remove offending comments and posts on social media handles by blocking. If users persist in posting negative comments; we may permanently block them. We may also hide comments when we feel they are unhelpful or potentially disruptive to our community.

Negative exposure on social media sites, or inappropriate or unauthorized action in the Bank's name, can result in lost trust and lost revenues. But underlying these reputational risks lie several other types of serious risks like strategic risk, business risk, regulatory risk, legal risk and market risk. In event of a crisis, all the handles can be temporarily disabled to avoid negative backlash. If not effectively mitigated, these risks can lead to serious negative consequences including fraud, intellectual property loss, financial loss, privacy violations and

failure to comply with laws and regulations. Hence, guidelines for staff have been issued before launch of social media.

The Union Connect team will have to ensure to adhere above and will inform any threat observed to Risk Management Department for measurement & mitigation.

9.12 New Initiatives & Way Ahead:

Bank shall continue initiatives to expand Digital Marketing through various social media channels. Bank shall create campaigns through Google Ads to promote Bank's services and offers. Bank shall launch its presence in new and upcoming social media channels/handles.

The outsourced vendor has to automate the First Level Response (FLR) through Chatbot across Bank's official social media handles, wherever applicable.

9.13 Guidelines/Regulations Governed By Any Act:

The Social Media Policy is governed by the Information Technology Act 2000 and any other Acts, if any, in force and there are no different guidelines/regulations for the same.

10. PARTNER SELECTION:

Going by the overall corporate communication strategy Bank may undertake empanelment of agencies with specialized skills in the following areas.

- Creative Agencies (for Brand Activity, Product & Services)
- Media Agency (for media planning & releases to media)
- Public Relations (PR) Agency
- Agency for Strategic Marketing Consultancy/Research
- The Bank may appoint an audit agency for evaluating the media planning and buying for campaigns undertaken by the Bank and for evaluation of production cost of TVCs, Events cost etc. preferably under one roof, on case to case basis, wherever warranted.
- Agency / Consultant for Digital Marketing

The areas for which agencies will be empanelled will be decided by the Managing Director & CEO on the recommendations of the Publicity Committee based on the Corporate Communication Strategy for the year and the empanelment process will be conducted by Corporate Communications.

In case of any specific requirement, seeking services of agencies outside the empanelment, can be undertaken by obtaining approval from Managing Director & CEO. Such process will define specific skills/nature of activities that

are either outside the scope of services defined for empanelled agencies or skills for the same are not available with empanelled agencies.

Bank may seek assistance with the approval of Managing Director & CEO of a specialized agency (who are well versed) for carrying out the Agency empanelment process. Experienced Agency having conducted such process for other Banks/PSUs may be hired for conducting such process of the Bank. The entire pitch process will be vetted by this agency.

All agencies will be empanelled for a period of three years (1+1+1) based on yearly performance. In case the term of empanelled agency is expiring before end of financial year, the period may be extended with the approval of Managing Director & CEO to the end of financial year for maintaining consistency in approach and keeping in view the nature of the engagement under implementation/in progress.

The number of agencies to be empanelled will be decided by competent authority as per requirement based on the overall strategy of the Bank.

Selection, Process/Norms for empanelment of Advertising agencies for Creative designs, Media Agency, Agency for Brand activity, Research/Planning and PR Agency or any Agency empanelled for efficient and cost effective working should be approved by Managing Director & CEO. When approved by MD&CEO, any changes shall also be approved by MD&CEO.

11. QUIET PERIOD:

To obviate any rumor/speculation, Bank will observe a “Quiet Period”. This is a period of two weeks/fourteen days in advance to the date of publication of financial results. During this quiet period, spokespersons will not initiate any meetings with analysts, investors or media and will refrain from discussing matters related to earnings and financial performance and will not undertake any of the following activity during this period :

- Immediately prior to the expected earnings release, the Company will cease all communication with the investing public.
- The quiet period ends when the earnings are publicly released.
- Any news that is contemplated during the quiet period should be especially scrutinized to ensure:
 - a) That the news has an absolute solid foundation to be released.
 - b) That the news is not released solely for the purpose of reversing any projected decrease in stock price due to poor earnings;
 - c) And should otherwise conform to the federal securities laws.

12. NON PUBLICITY EXPENDITURE:

Apart from developing and releasing various publicity materials/communications, Corporate Communications also oversees the responsibility for release of tender notice/legal notice etc. to maintain uniformity and realize value through empanelled media agency with respect to rate and placement of the Ad for such releases at Central Office level. These expenses will, however be classified under non publicity expenditure.

13. FORMATION OF PUBLICITY COMMITTEE :

Bank will constitute a publicity committee comprising of minimum five Vertical Heads, with Head of Corporate Communications as the Chairman / Chairperson of the Committee. The constitution of the Publicity Committee will be approved by the Managing Director and CEO. A minimum quorum of three members is required to conduct the proceedings of the committee.

The committee will be tasked to identify, assess, approve and recommend initiatives for publicity within the overall Corporate Communication Policy and Guidelines of the Bank.

14. DELEGATED AUTHORITY:

Delegated Authority	Financial powers per instance (For Publicity & Non Publicity exp)
Regional Head (Deputy General Manager/ Asst. General Manager)	Up to `1.00 lakhs
Field Chief General Managers /Field General Managers	Up to `5.00 lakhs
General Manager (Corporate Communications)	Up to ` 10.00 Lakhs and also release of payments to Agencies for Campaigns, Events, Publicity, Sponsorship, Corporate Gifting etc. approved by Publicity Committee / ED /MD&CEO / BOARD within the overall approved amount.
Publicity Committee	Above `10.00 lakhs but not exceeding `75.00 lakhs
Executive Director	Above `75.00 lakhs but not exceeding `200.00 lakhs.
Managing Director & CEO	Above `200.00 lakhs but not exceeding `1000.00 lakhs.
Management Committee of Board	Above `1000.00 lakhs.

15. Official Language Policy & implementation

Bank shall adhere to Government of India guidelines on official language and implementation while undertaking various communications.

16. Dissemination of Communication policy

Once approved, the Communication Policy shall be available on Bank's official web-site www.unionbankofindia.co.in and intranet site as well.

17. LIMITATIONS OF THE POLICY DOCUMENT:

This policy document has been drafted considering possible Corporate Communications Policy in view. It may be clarified that this is not comprehensive. There may be other matters also, which may be taken up in course of need at the appropriate time with the approval of the Competent Authority on case to case basis. This document is a Policy & Guidelines put in place to standardize procedural aspects, to have transparency and to enable the Bank to act in a clear, fair and unbiased manner.

This Policy shall be valid up to 31st March 2023 and its continuity may be extended for a further period not exceeding 3 months with specific approval of the Managing Director & CEO.

Annexure
(W.r.t. Para 7.1)

GUIDELINES FOR SELECTION OF MEDIA

1. **Major Campaigns:** As all major campaigns need a 360° approach. The media agency in consultation with the creative agency and the Bank's brief will prepare a media plan and the cost outlay for the same. The publicity committee along with the Top management will finalize and approve the same for execution. If required, mid-course modifications may be carried out by the General Manager, Corporate Communication based on the feedback.

2. **For other releases :** The Bank will evaluate opportunities for release of corporate/product ads through various media e.g. events like major sport tournaments, major exhibitions, award functions, conclaves and conferences, important days like anniversary/foundation days, new products and services etc.

Selection of media for such events/occasions/opportunities will be decided based on the overall communication strategy. Publicity committee and /or Managing Director & CEO/Executive Director will evaluate such opportunities. Media Buying agency/department will negotiate the price. The final decision will be based on reasonable cost/verifying bench mark for cost evaluation.

3. **Release of Advertisements in Souvenirs/Brochures:** In various clubs/associations/colleges/institutions and regional magazines may be considered on merit by the delegated authority.

4. **Policy guidelines on usage of following media:**

4.1 **Electronic Media** - TV/Radio & Digital / Social media: Various tools available for evaluating the performance of the channel/program like TRP/GRP/rate etc. may be used as guiding point for selection. However, the plan to be finalized based on Banks requirement/budget allocation etc.

Bank may entrust the job of production of TVCs/AVs & jingles to other professional individuals/firms/ agencies with specialize and technical expertise, after approval by

the Competent Authority, if the desired input from the existing empanelled agency is not forthcoming.

For ad-hoc requirements of TVCs/AV & jingles, creative agency/ies may be allotted job on the basis of their presentation after due approval.

4.2 Outdoor Media (For recall & retention factor): Includes hoardings/KIOSKS/Glow Signs/Mobile Vans/banners/Airport trolleys/Public transport like buses/train/Utility media etc.

FGM's/RM's shall monitor and support in establishing good visibility of the Bank.

4.3 For carrying out activity in Print/Electronic/Sponsorship/OOH Media, Bank can select from the various modes, directly from the Vendors / owners of the site, the field Offices or through empanelled media agencies.

4.4 Sponsorship: In form of banners/stalls/exhibits by sponsoring programs of institutions / associations /clubs, sports, musicals, festival gatherings/beatification of gardens, traffic islands etc. may be considered on case to case basis as part of Banks commitment to the society. Bank approved publicity designs/messages be displayed/published.

4.5 Release of Advertisements/Fairs/Sponsorships: In Souvenirs or Annual publication / participation in fairs/sponsorships of event and /or displaying banners during an event etc. on the basis of individual requests from concerned organization/association or otherwise may be considered on case to case basis as a part of Bank's commitment to the Society.

Only Bank's approved Publicity designs/Message may be displayed/published.

The bank releases advertisements for its various products on being approached by various publications viz. magazines, journals, etc. It should be ensured that the periodicals (weekly, fortnightly, monthly, quarterly & annual) should be of repute having good circulation.

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