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## CORPORATE COMMUNICATIONS POLICY

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Approved on	<i>{to be replaced with date of approval of new version}</i>
Policy Owner	Head Branding, Communications and PR
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### **Revision History and Approvals**

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## 1. SCOPE OF THE POLICY

This is the Corporate Communications Policy of ESAF Small Finance Bank (the "**Policy**") which includes the functions, Branding and Creatives, Media Management and Public Relations, Advertisements, Documentation and Corporate Events, Web and New Media, Publications and Communications of ESAF Small Finance Bank under the Branding Communications and PR Department and is in force from 06/08/2019

## 2. OBJECTIVES OF THE POLICY

2.1 This document sets out the Media and Communication Policy of ESAF Small Finance Bank.

2.2 The aim of this policy is to articulate the goals, processes and guiding principles of communication adopted by the Bank to encourage its stakeholders about Bank's corporate identity, various products and services, customer initiatives, crisis and any similar issue of relevance to the Bank.

2.3 The main objectives of the Corporate Communication Policy are:

- (a) Pursuing strong corporate reputation through high transparency and consistency in communication with stakeholders
- (b) Timely communication with stakeholders -with clarity, coherence and credibility
- (c) Disseminating information through the official website of the Bank on real time basis

2.4 It is imperative that in all dealings with Media, the Bank is represented in a responsible, professional and coordinated manner and that all statements made for and on behalf of the Bank is true, accurate and appropriate and made by the authorized representatives. Accordingly, the main objective of this Policy is to establish guidelines and prescribe roles, responsibilities and processes for engagement and communications with Media  
by:

- Designated Spokespersons
- Employees of the Bank
- Partner firms
- Branding Communication and PR Department of the Bank
- Marketing Department of the Bank

2.5 Further, this Policy envisages to:

- Establish mechanisms and guidelines for the spokespersons representing the Bank
- Establish standards and expectations regarding any engagement or communication concerning the Bank with Media.
- Address qualitative issues with respect to participation in Media.

## 3. DEFINITIONS AND INTERPRETATION

### 3.1 Definition

For the purpose of this Policy, the following terms shall have the meanings assigned to them as hereunder:

**(a) "The Bank"** shall mean ESAF Small Finance Bank.

**(b) "Media"** shall mean and include any of the following: (i) internet portals including social media platforms; (ii) television channels; (iii) radio channels; (iv) magazines; (v) newspapers; (vi) out-of-home (OOH) and other relevant organs.

**(c) "Employee"** shall mean and include the employees and directors of ESAF Small Finance Bank and the Partner Firms and consultants, agents and such other persons in the services of ESAF Small Finance Bank.

(d) "**Social Media**" shall mean and include any web or mobile or any other platform that enables and facilitates interactive communication or permits exchange/posting of user generated content, including without limitation blogs, micro-blogs, online forums, social networking websites/applications, content sharing websites/applications, vlogs and video sharing websites/applications, wikis, social bookmarking services, user rating services and other digital channels established for online interaction and connection.

(e) "**Head (Branding Communications and PR )**" shall mean a senior employee of the Bank who is heading and supervising the functions of Corporate Communications - Branding and Creatives, Media Management and Public Relations, Advertisements, Documentation and Corporate Events, Web and New Media, Publications and Communications - of the Bank which are under the Branding Communications and PR Department.

### **3.2 Interpretation**

(a) For the purposes of this Policy, engagement/interaction/contact with Media includes provision of information *via* media releases or statements, letters to the editors of Media houses, responding to Media queries over the phone and/or *via* email, interviews or briefings, disclosing information to Media, comments on any Media platform or publication including social media, addressing a seminar or conference where Media is present, and Media activities for events, reports and launches.

(b) For the purpose of this Policy, the Media relations team includes the Head of Branding Communications and PR in the Bank and the public relations (PR) agencies/consultants engaged by the Bank or any other official designated by the MD & CEO for such duties.

## **4. GUIDING PRINCIPLES OF COMMUNICATION**

- (a) 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.
- (b) 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. ..
- (c) The guiding principles of the Corporate Communication Policy of the Bank 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 and services, financial market, regulatory and compliance matters relating to the Bank.
- (d) 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.
- (e) Communication is primarily focused on issues of importance to the Bank, in particular and banking, in general.
- (f) •Bank endeavours to place all relevant information in the public domain so as to discourage individual seeking information on selective basis.

## **5. BRANDING AND COMMUNICATIONS DEPARTMENT**

The Department of Branding Communications and PR of the Bank aims to enhance the Bank's presence in media and manage the Bank's reputation through dissemination of key issues and accomplishments relating to the Bank. These key messages are based on our business achievements of the Bank through the spokesperson i.e., Managing Director & Chief Executive Officer of the Bank.

## **6. ANNUAL STRATEGY & BUDGET**

6.1 The Department of Branding Communications and PR shall prepare the annual strategy, the execution plan and proposed budget for the same.

6.2 The allocation of the budget of the Department of Branding Communications and PR and inter changeability in the allotted budget under various heads will be approved by the Managing Director and Chief Executive Officer or in his absence by the Executive Vice President under the instructions of Managing Director & Chief Executive Officer, duly recommend by the Head of Branding Communications and PR.

6.3 All financial outlay will be sanctioned as per the expense approval matrix approved/ amended by board from time to time.

6.4 All guidelines in connection with the operations of Branding Communications and PR Department shall be issued time to time.

## **7. QUIET PERIOD**

To obviate any rumour / 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 applicable laws.

## **8. SOCIAL MEDIA**

The Branding Communications and PR Department is monitoring our Social Media posts and provides necessary updates and replies. Any customer complaints will be attended immediately to avoid repeated posts in Social Media by the complainant, which might have adverse publicity to the Bank. The details of the complaint will be immediately reported to the respective department and also will intimate the Customer Service Quality team. The Department concerned will be drafting a reply and get it vetted with the EVP before forwarding it to the Branding Communications and PR Department who will be uploading the same in the required platform. Our experience tells us that once our reply is posted immediately further posts by the complainant subsides, if he is satisfied with the response or we can expect the next post.

The use of Social Media by the Employees is subject to guidelines, the Bank may issue in this regard.

## **9. SELECTION OF MEDIA**

The selection of media is subject to guidelines in the Standard Operating Procedure of this Policy.

## **10. MONITORING, REPORTING AND DISCIPLINARY ACTION**

To the extent permitted and not explicitly prohibited under applicable laws, the Bank shall monitor and may look into any Media interaction by any Employee. Further, the Bank shall monitor comments or discussions by any Employee on Media. If in the Bank's view, any comment made by an Employee on Media violates ESAF Small Finance Bank's Code of Conduct or this Policy or the Bank's other policies and procedures, Bank can seek clarifications and if required, ask the relevant Employee to get that comment modified or deleted from the relevant Media platform(s).

If any Employee come across any content that requires reporting, please send an email to [communications@esafbank.com](mailto:communications@esafbank.com)

Any Employee who contravenes any provision of this Policy may be subject to appropriate disciplinary actions.

## **11. DISSEMINATION OF CORPORATE COMMUNICATIONS POLICY**

Once approved, the Corporate Communications Policy shall be available on Bank's official website [www.esafbank.com](http://www.esafbank.com) and intranet site as well.

## **12. TERM OF THE POLICY**

This policy shall be valid till for one year and its continuity may be extended for a further period not exceeding 6 months with specific approval of the Managing Director & Chief Executive Officer.

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