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IT POLICY AND GUIDING PRINCIPLES

APPROVED BY BOD

1. Policy Statement

1.1 This policy is intended to help Mya Ayer Group of Companies (MAG's) staffs make appropriate decisions about the use of internet & social media such as blogs, wikis, social networking websites, podcasts, forums, message board, or comments on web-articles, such as Twitter, Facebook, Link and similar social media sites.

1.2 This policy outlines the standards we require staff to observe when using social media, the circumstances in which we will monitor your use of social media and the action we will take in respect of breaches of this policy.

1.3 This policy supplements our MAG Staff Manual and MAG Code of Conduct.

1.4 This policy does not form part of any contract of employment and it may be amended at any time.

2. Who is covered by the policy?

2.1 This policy covers all individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, home workers, part-time and fixed-term employees, casual and agency staff and volunteers (collectively referred to as staff in this policy).

3. The scope of the policy

3.1 All staffs are expected to comply with this policy at all times to protect the privacy, confidentiality, and interests of our bank and our services, employees, partners, customers, and competitors.

3.2 Breach of this policy may be dealt with under our Employee Disciplinary Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

4. Responsibility for implementation of the policy

4.1 The Compliance Committee has overall responsibility for the effective operation

of this policy and is responsible for monitoring and review the operation of this policy and is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimize risks to our operations.

4.2 All staffs are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All staffs should ensure that they take the time to read and understand it. Any breach of this policy should be reported to respective Admin and HR directors.

4.3 Questions regarding the content or application of this policy should be directed to MAG Compliance Committee.

5. Using internet & Social Media sites in MAG

5.1 Only authorized officials are permitted to post material on a social media website in our name and on our behalf. Any breach of this restriction will amount to gross misconduct.

5.2 If you are in any doubt as to what you can and cannot say using social media, then please contact MAG Compliance Committee.

6. Using work-related Social Media

6.1 We recognize the importance of the internet in shaping public thinking about our company and our services, employees, partners and customers. We also recognize the important of our staff joining in and helping shape industry conversation and direction through interaction in social media.

6.2 Before using work-related internet & social media, you must have read and understood this policy and other relevant policies of Mya Ayer Group of Companies, and have sought and gained prior written approval to do so from respective senior management.

7. Personal use of Social Media

7.1 We permit the incidental use of internet and social media websites for personal use subject to certain conditions set out below. However, this is a privilege and not a right. It must neither be abused nor overused and we reserve the right to withdraw our permission at any time at our entire discretion.

7.2 The following conditions must be met for personal use to continue:

- (a) Use must be minimal and take place substantially out of normal working hours (that is, during lunch hours, before 8 am or after 5:30 pm).
- (b) Use must not breach any of the rules set out in paragraph 8 below.
- (c) Use must not interfere with business or office commitments.
- (d) Use must comply with our policies including the [MAG Code of Conduct, Code of Ethics, Staff Manual, Anti-Fraud Policy and Whistle-Blowing Policy].

8. Rules for use of Social Media

Whenever you are permitted to use social media in accordance with this policy, you must adhere to this internet and social media policy, employee handbook, and Code of Conduct.

8.1 Always write in the first person, identify who you are and what your role is, and use the following disclaimer “The views expressed are my own and don’t reflect the views of my employer”.

8.2 Do not upload, post, forward or post a link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content.

8.3 Any member of staff who feels that they have been harassed or bullied or are offended by material posted or uploaded by a colleague onto a social media website should inform to their admin manager or human resources manager.

8.4 Never disclose commercially sensitive, anti-competitive, private or confidential information of the Company. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss with admin manager or human resources manager.

8.5 Do not upload, post or forward any content belonging to a third party unless you have that third party’s consent.

8.6 It is acceptable to quote a small excerpt from an article, particularly for the purposes of commenting on it or criticizing it. However, if you think an excerpt is too big, it probable is. Quote accurately, include references and when in doubt, link, don’t copy.

8.7 Before you include a link a third-party website, check that any terms and

conditions of that website permit you to link to it. All links must be done so that it is clear to the user that they have moved to the party's website.

8.8 When making use of any social media platform, you must read and comply with its terms of use.

8.9 Do not post, upload, forward or post a link to chain mail, junk mail, controversial cartoons, jokes or gossip.

8.10 Be honest and open but be mindful of the impact of your contribution might make to people's perceptions of us as a Responsible Business. If you make a mistake in a contribution, be prompt in admitting and correcting it.

8.11 You are personally responsible for content you publish into social media tools be aware that what you publish will be public for many years.

8.12 Don't escalate heated discussions, try to be conciliatory, respectful and quote facts to lower the temperature and correct misrepresentations. Never contribute to a discussion if you are angry or upset, return to it later when you can contribute in an calm and rational manner.

8.13 If you feel even slightly uneasy about something you are about to publish, then you shouldn't do it. If in doubt, always discuss it with admin manager or human resources manager.

8.14 Don't discuss colleagues, competitors, customers or suppliers without their prior approval.

8.15 Always consider others' privacy and avoid discussing topics that may be inflammatory e.g. politics and religion.

8.16 Avoid publishing your contact details where they can be accessed and used widely by people you did not intend to see them, and never publish anyone else's contact details.

8.17 Activity on social media websites during office hours should complement and/or support your role and should be used in moderation.

8.18 If you notice any content posted on social media about us (whether complementary or critical) please report it to admin manager or human resources manager.

9. Monitoring use of social media websites

9.1 Staff should be aware that any use of social media websites via MAG's office provided internet access (whether or not accessed for work purpose) may be monitored and, where breaches of this policy are found, action may be taken under our Disciplinary Procedure.

9.2 We reserve the right to restrict or prevent access to certain social media websites if we consider personal use to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

9.3 Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal liability against you and us. It may also cause embarrassment to us and to our clients.

9.4 In particular uploading, posting forwarding or posting a link to any of the following types of material on a social media website, whether in a professional or personal capacity, will amount to gross misconduct (this list is not exhaustive):

- (a) Any pornographic material
- (b) A false and defamatory statement about any person or organization;
- (c) Material which is offensive, obscene, criminal discriminatory, derogatory or may cause embarrassment to us, our customers or our staffs;
- (d) Confidential information about us or any of our staff or customers (which you do not have express authority to disseminate);
- (e) Any other statement which is likely to create any liability (whether criminal or civil, and whether for you or us); or
- (f) Material in breach of copyright or other intellectual property rights, or which invades the privacy of any person. Any such action will be addressed under the [Disciplinary Procedure] and is likely to result in summary dismissal.

9.5 Where evidence of misuse is found we may undertake a more detailed investigation in accordance with our Disciplinary Procedure, involving the examination and disclosure of monitoring records to those nominated to undertake

the investigation and any witnesses or managers involved in the investigation. If necessary such information may be handed to the police in connection with a criminal investigation.

9.6 If you notice any use of social media by other members of staff in breach of this policy please report it to [in accordance with MAG's Whistle-Blowing Policy].

10. Monitoring and review of this policy

10.1. The compliance committee shall be responsible for reviewing this policy when and as necessary.