

ASIAN PAINTS LIMITED – COMMUNICATIONS POLICY

In this Communications policy, the expression 'Asian Paints' and/or 'the Company' means the Asian Paints group comprising of Asian Paints Limited and its subsidiary, joint venture and associate companies. The Board means the Directors of Asian Paints Limited.

Introduction

The Asian Paints Communications Policy is an important part of the Company's endeavour to provide accurate, timely and consistent non-proprietary information about its products, services and activities to all stakeholders. These stakeholders include employees, shareholders, customers, suppliers, public officials, the investors, various trade and professional groups, the general public and the media.

Communication plays a strategic role in the Company and when done well it helps to ensure that the relevant information reaches all stakeholders in the right way and at the right time.

This Policy should be read in conjunction with the Asian Paints Charter, Code of Conduct for employees, accepted system usage practices and the Code of Conduct to Regulate, Monitor and Report trading by Designated Persons. It applies to everyone at Asian Paints Limited and its direct and indirect subsidiaries in India and abroad – the Board, employees, consultants and agency personnel who work at Asian Paints or under the direction of Asian Paints.

Internal Communication

- **Purpose**

The purpose of internal communication is to contribute to the Company's overall business objectives and to provide employees with the information they need to enable them to work effectively by enhancing their knowledge of the Company and its strategy.

- **Communication channels**

- Intranet (HRIT or similar platform) provides information such as policies, internal news, organisational changes, leadership messages, articles, links to business tools & workflows etc.
- Emails/ Newsletters/ mailers from the MD & CEO, Human Resources, Corporate Communication, Corporate Finance, IT and such other functions for all employees or select functions as per need.
- Corporate meetings/ offsites/ townhalls/ events
- Corporate e-mails and official chat messages.

- **Guiding principles**

Every employee of the Company may receive information related to the Company on need to know basis and for furtherance of business purpose.

All internal communications is meant for internal use only and not for public consumption.

- **Responsibility**

The members of the One Link (employees in the cadre General Managers & above and the MD & CEO of Asian Paints Limited) have overall operational responsibility for internal communications. However, employees at all levels to ensure that all relevant information as required for their/ other employees' role and responsibilities are disseminated in a timely manner.

External Communication

- **Purpose**

External Communication is intended to reach one or more stakeholders outside of the Company, such as the media (which is both a channel and a stakeholder), customers, prospective candidates, current and future investors, the stock exchanges, regulatory authorities and the public at large. The purpose of Asian Paints' external communication is to support the Company in reaching its overall objectives through stakeholder relationship and by building the brand through awareness of Asian Paints, its products & services and its business operations.

- **Communication channels and guiding principle:**

- **Websites-** The corporate websites (www.asianpaints.com and other official websites of the Company and subsidiaries) aim to be a one-stop-shop serving all stakeholders. Information published in website should be factually correct and updated as per process set by Marketing function- Deco Business who are responsible for setting the related process and managing the Company website. The website's section related to About us/ Media (press release) and Investors section is responsibility of the Corporate Communications function along with the Secretarial function.
- **Marketing events** including painter/ contractor/ dealer meets– respective organising team to ensure use of information which are in public domain which includes product information sheet, approved product features and usage practices and other similar details.
- **External Conferences** – prior written permission is required from the superior (atleast at General Manager level) of the concerned function to speak or represent the Company at a conference, external gathering, award function, placement events, any other forum as panel member, speaker, contributor to the event. Public content from the latest corporate

presentation or the official website can be used. Any additional sharing of information requires approval of functional General Managers. In cases where the view being presented may not conform to the views of the Company, employees should make clear that any views/ opinions expressed are strictly personal and do not necessarily reflect the views/ opinions of the Company.

- **Advertisements** – Sales and Marketing function’s Senior Managers and above to approve on all advertising for all medium e.g. print, outdoor, TV ads, social media ads and web ads. All advertising content and contracts need to follow the guidelines shared by Legal team from time to time and any exceptions requires prior approval of Legal.

- **Media**– communication on behalf of the Company in prints, TV news channel etc are amongst the important sources of communication with shareholders, customer and the public at large.

Corporate Communications function is the primary point of contact for all media queries & contacts and any query received from the media should be directed to Corporate Communications function. Responsibility for dealing with media lies with the MD & CEO, the CFO and Corporate Communications Function. The MD & CEO and/or the CFO may delegate someone to interact with media for specific topic/ news item for certain period.

The Company may not comment or reply to rumours, statements or questions posted on internet discussion groups or social media.

- **External interaction**- that forms a part of normal role of a function will vest with the function concerned e.g. communication with dealers/ distributors/ painters/ contractors/vendors by Sales and Marketing function or with a supplier by Purchase function etc. Such communication should be correct and restricted to specific requirements related to engagement or contract. Any communication on non-related area should be limited to information available in public domain only.
- **Press releases**- these will be drafted by Corporate Communications function and approved by the MD & CEO and the CFO. Press releases related to products and services will be crafted by the Marketing team and will need the approval of the MD & CEO and/ or the AVP – Sales & Marketing/ AVP- Services. All releases by the Marketing function must be shared with the Corporate Communications function simultaneously. Press releases will be distributed simultaneously to all publications whether print or digital. No other function is authorised to send a news release directly to the media.
- **Other’s websites**: Use of the Asian Paints logo or trademarks on any third-

party website/ promotions requires prior written consent of the Legal team. Such usage of brand logo and/or trademarks should be strictly in accordance with the Asian Paints Brand usage guidelines [Link-asianpaints.sharepoint.com/sites/hrit/#/references/brand-guidelines]. If used as a hyperlink, the logo should point to the Asian Paints homepage at www.asianpaints.com or the respective subsidiary company's website.

- **UPSI-** handling of information which is in the nature of Unpublished Price Sensitive Information (UPSI) as defined under the Code of Conduct to regulate, monitor and report trading by Designated Persons shall be as per the specific rules set forth in the Code. Only spokespersons appointed in section 4 of above referred code have a mandate to make official statements on behalf of Asian Paints and/or its subsidiaries and joint operations within the individually defined areas set forth in the section.
- **Social media-** given the growing voice of social media in the communications space, there is a detailed social media policy in Annexure A.

Overall all communication with all external stakeholders including media and investors must be aligned with the Company's official stance & strategy and must only be done by duly authorised spokespersons of the Company.

- **Responsibility**

The CFO is the custodian with Corporate Communications function being responsible for adherence to the policy related to external communication. Any related query should be referred to the CFO via email to Corporate Communications at proffice@asianpaints.com.

Investor Relations

- **Purpose**

The purpose of the Company's information to the financial markets and investors is to increase knowledge and recognition of the Company and its operations. The intent is to engage with the investor community on a continuing basis to ensure transparency, enhanced disclosures, symmetry of information and instill confidence in management of the Company.

- **Target audience** includes the financial community including shareholders, investors, prospective investors, Fund Managers, analysts etc.

- **Communication channels** includes:

- Annual General Meeting

- Analyst meets
- Investor calls/ meets
- Stock Exchange disclosures
- Email communication
- Public notices
- Website disclosures

- **Guiding principles**

- Presentations made to the investor community to be made public on the Company's website in a timely manner. Such presentation to be shared with the stock exchanges as per prevailing regulation from time to time.
- Forward looking statements aiming to predict future financial performance are prohibited, except with the prior permission of the MD & CEO and/or the CFO.
- Employees/ designated person should refrain from meeting the investor community during the quiet period. In case of interactions during this period, employees should refrain from commenting on the current quarter citing the "quiet period" as the reason. General clarification of facts that are in the public domain are allowed.
 - Areas of discussion that are considered acceptable include explanation and clarification of previously published information, correction of misunderstanding, miscalculations and obvious logical errors, and providing industry statistics and general economic outlook that is in the public domain.
- Queries from individual shareholders should be directed to the appointed Registrar of the Company or the Secretarial department.
- Queries for Investor interaction should be forwarded to proffice@asianpaints.com.

- **Price sensitive information**

'Unpublished price sensitive information' (UPSI) is any information which relates directly or indirectly to the Company, which if published is likely to impact the share price of the Company. The Company will notify the stock exchange of any price sensitive information to enable equitable availability of information to all shareholders and the general public.

- **Responsibility and spokespersons**

The MD & CEO and the CFO & Company Secretary or any employee officially designated by them are responsible for investor relations.

Breach of policy

Breach of this policy could result in disciplinary action including termination of services depending on the severity of the breach based on the decision taken by the MD & CEO and CFO & Company Secretary.

Asian Paints encourages its employees to bring any concerns to the fore. An employee who suspects violations of this Policy is expected to speak up and raise the issue with their line manager, Human Resources, or Ethics Hotline , who in turn will intimate the MD & CEO and the CFO & Company Secretary. Employees may also write to the MD & CEO and the CFO & Company Secretary directly. At Asian Paints, we do not accept any form of retaliation against someone who speaks up, expresses concerns or opinions in line with the Whistle Blower Policy.

Asian Paints Limited

Social Media Policy

In this Communications policy, the expression 'Asian Paints' and/or 'the Company' means the Asian Paints group comprising of Asian Paints Limited and its subsidiary, joint venture and associate companies. The Board means the Directors of Asian Paints Limited.

Purpose and scope

The Company recognises and appreciates the fast-changing landscape of the Internet and the valuable opportunities it provides to engage with various stakeholders. However, social media also has the potential to affect the reputation of the Company and expose the company to business or legal risk. The intent of this Policy is to minimise the risk by laying out rules that apply to the use of social media both for official and personal use. The Company encourages all employees to use social media the right way.

This Policy is designed to reflect the Company's Values & Code of Conduct and must be read in conjunction with the Communication Policy. It sets out expectations when employees or any third party use social media as part of their job responsibilities and/or during personal use when any references are made to the Company or any of its brands directly or indirectly.

It applies to all employees and others working on behalf of the Company. Breach of this Policy could result in disciplinary action such as suspension without pay, loss of merit increase or annual incentive or in severe cases even termination of services or contract or any other action as decided by the management. Any use of social media that could harm the reputation of the Company or misuse of social media to be brought to the notice of the social media team of Deco business, respective manager or Ethics Hotline. If in doubt, please reach out to the CFO and/or the Corporate Communication Function at proffice@asianpaints.com.

Guiding Principles

Guiding principles revolve around five social media principles:

1. Be authentic
2. Be transparent; make all appropriate disclosures
3. Follow the law; follow Code of Conduct of the Company
4. Act as the custodian of reputation of the Company
5. Do not express views or opinions on behalf of the Company unless designated to do so.

Definition

Social media is a collective term used for websites and applications that facilitate conversations over the internet and enables users to create or share content, network, collaborate and/or interact virtually usually in a community

setting. For the purposes of this Policy, social media includes but is not limited to the following:

- Social networking sites such as LinkedIn, Google+, Instagram, Facebook, WhatsApp, Weibo, WeChat
- Blogs including micro-blogging sites such as Twitter
- Photo and video-sharing sites such as YouTube, Pinterest, Flickr
- Forums and discussion boards such as Huddle, Reddit, Yahoo! Groups, Tumblr
- Wikipedia
- Review sites such as Glassdoor, Yelp, Indeed

Such posts could happen via any electronic device e.g., computer, laptop, smartphone, tablet etc.

OFFICIAL USE OF SOCIAL MEDIA – GUIDELINES

The Company has number of official social media accounts that are managed by the respective social media marketing teams. These are accounts which use Asian Paint's name or the names of its brands.

The following standards and procedures must be followed by employees and third parties when using social media as part of their job responsibilities at or for Asian Paints etc.

1. **Maintenance of directory:** The Social Media marketing team should maintain a log of administrator and access details to ensure that access is always available in case of unexpected or planned leave of absence of employees/ associates managing the handles.
2. **Well-documented process:** Every Asian Paints sponsored social media presence (including on third party sites) should have a documented plan to ensure compliance with the Social Media Policy and the plan should cover:
 - a. A designated owner: Every Asian Paints sponsored social media presence must have a designated owner well-versed with his/her roles and responsibilities.
 - b. A review process: All official managed accounts should go through a functional review to determine the value of an account and recommend closure, if necessary, e.g., in cases where an account is inactive or has been the cause of reputational damage.

Further, any new type of social media presence and/or any new external Asian Paints sponsored site must be thoroughly vetted for risk/benefit.

3. Principles for communication: The following broad principles to be followed when representing the Company on Social Media:

- a. Remain guided by Company policy, including our Charter, Values and our Code of Conduct: It is important to always do what is right. It is also important to ensure that all third-party agencies acting on our behalf understand how the Company expect them to conduct themselves.
- b. Protect data and respect individual privacy: Ensure that any collection or use of data on social media complies with all prevailing laws on Data Privacy and policies of the Company. This includes how the Company collect, store, share, and/or use such data.
- c. Be authentic: As a spokesperson of the Company, it must be ensured that all posts are completely accurate and come across as being reliable and sincere and have gone through all internal approvals
- d. Do not reveal any business-related confidential, or proprietary or internal-use-only information: Be familiar with the type of information one possesses. For example, do not post price sensitive information or proprietary information or competitive information about the Company. This includes but is not restricted to product architecture, formulations, trade secrets, manufacturing plans, raw material used and their prices, source codes, product plans, customer/ vendor/ dealer/employee details, financial information. All such information belongs to the Company and may be protected by patent, trademark, copyright and trade secret laws. Please refer to our Code of Conduct and other related policies for details.
- e. Ensure that any source is attributed: Ensure that Asian Paints has all the relevant rights of publicity or similar rights for use of photos, video clips, music etc. Do not assume that permission for one type of use in print or electronic or online media allows for use elsewhere (e.g., permission may be for one time use or be restricted to certain brands/ products, certain channels, certain periods, certain geographies etc.). If in doubt, please contact the Legal department.

- f. Be aware that are you are representing Asian Paints: Be respectful of all individuals, no matter what culture, ethnicity, political leaning or religion they belong to. Be polite in all online engagement, including when responding to negative comments, and ensure that all responses are consistent with our Values.
- g. Do not retweet or share posts coming from any political group or religious group: The Company does not have any affiliation with any political party or religious group therefore refrain from any related content. In case of a requirement for such affiliation, please ensure prior, written approval from the MD & CEO or the CFO.

PERSONAL USE OF SOCIAL MEDIA - GUIDELINES

Social media has become part and parcel of daily lives. Social media is used in a wide variety of ways in everyone's personal lives, and it is quite possible that sometimes posts may reflect our professional lives at Asian Paints. It is likely that the content someone post may be viewed as representing Asian Paints' point of view, whether intended or not, and this could impact the Company's business and reputation. So, while the Company employees may choose to use social media, it's expected that each employee use good judgement and ensure use of social media in the right way.

The following guidelines apply when the employee uses social media in a personal capacity – whether via a company-issued device or personal device. This will help minimize legal and reputational risk and ensure the long-term success of the Company.

1. Use personal time for social media: Ensure that the time spent on social media does not interfere with the work of self or colleagues or third-party associates.
2. Be transparent and disclose you work for Asian Paints and that your views are your own: When using your personal social media accounts, use your real identity and disclose your affiliation with Asian Paints. If you post material related to the Company or any one of our brands or businesses on social media, identify that you are an Asian Paints employee in every posting and that you are not speaking as a company representative. Be transparent that your views/opinions are your own. For example, you could say something like, "The views expressed in this blog/ post/ tweet etc. are my own and do not necessarily reflect the views of Asian Paints."

3. Sensitive posts: Be aware of what you post or repost by keeping in mind the impact it could have on the Company's reputation.
4. Include an appropriate disclaimer when providing personal references: Do not provide any professional reference to any individual whether a current or former Asian Paints employee or any third-party on any social networking sites such as LinkedIn. Employees may provide personal references but should ensure that (a) the information is factually correct and (b) includes a disclaimer e.g. This reference is made by me in my personal capacity and should not be construed as a reference from Asian Paints or any of its affiliates.
5. Take care of how you portray your profile: Be aware that others will associate you with your employer whether intended or not. It is therefore important for you to ensure that your social media profiles and related content is consistent with how you wish to present yourself to colleagues and all third parties.
6. Use your own identity: Do not use an alternate identity or impersonate someone to use social media for inappropriate posts.
7. Use your personal email: Always use your personal email address when using social media in your personal capacity.
8. Ensure all your posts are appropriate: Do not transmit or post inappropriate information and/or pictures (e.g., pornography, abusive posts).
9. Respect Asian Paints premises: Do not post personal photos/ videos filmed on Asian Paints property or at Asian Paints employee or stakeholder events without specific permission of employees in the photo/ video or organisers (e.g., employee get together, contest entries, dance routines, parody etc).
10. Air work-related grievances before the appropriate forum: Do not use social media as a forum to air grievances about Asian Paints, your work, colleagues or associated third parties. Any such grievances should be taken up internally through the appropriate forum.
11. Restrict access to Asian Paints information on company devices if used for social media: Do not allow access to Asian Paints contact lists, address books or calendar to third party social media sites in case you use your office computer or mobile device to use social media. When prompted, do not allow social media sites to access your email contact lists located on Asian Paints hardware and software (e.g., your contact list from your work email account). This will help protect the privacy and

personal security of you and other Asian Paints employees.

12. Always protect Asian Paints confidential, competitive and proprietary information: Do not talk about your work, responsibilities or projects on social media even if you feel it is taking place in a seemingly “private” setting e.g., Direct Message on Twitter or a restricted post on LinkedIn. Be aware that any material posted on external, social media sites is no longer in the control of you or Asian Paints.

This guidance applies to your inner circle be they family members or close friends – a casual conversation you may have about your work could show up as a social media post.

13. Do not engage with the media or industry analysts: To ensure that Asian Paints communicates with the media and industry analysts in a timely and appropriate way there are designated person to engage with them. Please direct any outreach you may receive from the media or industry analysts to the Corporate Communications function.

14. Confidential information handling: To protect confidential and propriety information, the employee to follow guidelines available in the Code of Conduct and other policy from time to time before posting any information in social media. The employee to refrain from posting any development or project association related to UPSI information (e.g. details on merger & acquisition, new geography, new product details etc.).

15. Think twice before every post: Always ask yourself the questions: “What if my post made it to a newspaper headline?” or “What if a trusted customer read my post?” “How would I feel if someone took a screenshot of my post and circulated it?”