

## USE OF RECORDING DEVICES POLICY

### **Background**

Modern technology and the proliferation and use of personal mobile communication and other electronic devices, has made it increasingly easy for employers or employees to make consensual or non-consensual recordings in the workplace.

However, the company's position is clear in that use of audio and visual recording devices whether in the course of work or at anytime, whether :-

- (i) between employer and employee,
- (ii) between supervisor and subordinate,
- (iii) between employee and 3<sup>rd</sup> parties (i.e., customers, suppliers or vendors)
- (iv) in conversations with any 3<sup>rd</sup> parties

within the company's workplace or outside the workplace or at any customer, supplier or vendor's premises **is not allowed at all times.**

### **Definitions**

**In this policy, unless the context otherwise requires:-**

**“recording” means the use of any audio and visual recording devices to capture video/ images or audio/ voices, regardless of whether in person, by telephone or by other means.**

**“audio and visual recording devices” means all work and/ or personal devices that can record images and voices, including but not limited to any cellular telephone, PDA, digital recording device, digital camera, or any other type of media device or apparatus.**

**“3rd party” means the customers, suppliers or vendors of the Company.**

### **Purpose**

This policy explicitly prohibits the use of any audio and visual recording devices by any employee in the above context unless specifically permitted by the Company or with the prior written permission of the Company. Employees are also not allowed to arrange for any other person(s) to make or arrange for any audio or visual data recordings in the above context.

By implementing this no-recording policy, the company is :-

- Respecting privacy expectations of employees, customers, and guests,
- Encouraging the free flow of information within the company and promoting an open and honest workplace environment,

- Protecting confidential information, proprietary material and trade secrets of the company, customers, vendors and suppliers (including but not limited to the global MNCs and other suppliers) and addressing the business risk and any confidentiality rights.
- Fostering frank discussions between employees, co-workers, and supervisors,
- Fostering free and frank exchange of views, ideas and discussions among the employees, co-workers, supervisors and 3rd parties.
- Preventing disruption in the workplace resulting from recordings, which can be distracting and make the party being recorded uncomfortable

### **Violation of the Policy**

The Human Resources Division is responsible to ensure this Policy is observed and understood by all in order to achieve the aim of this Policy.

Any employee found in violation of this policy may be subjected to disciplinary action.