

Vessel Warehousing Private Limited
COMPLAINT MANAGEMENT

CONTENTS

DOCUMENT HISTORY AND VERSION CONTROL.....	
OVERVIEW	
PURPOSE	
SCOPE	
DEFINITION	
RISK MANAGEMENT	
GUIDELINES OF EFFECTIVE COMPLAINTS HANDLING	
SOURCES OF COMPLAINTS	
CATEGORIES OF COMPLAINTS	
A. Minor Complaints.....	
B. Major Complaints.....	
C. Anonymous Complaints.....	
D. Identifiable or signed complaints.....	
E. Pseudonymous complaints.....	
F. Whistle Blower / Sexual Harassment complaints.....	
G. Matters not treated as complaints.....	
KEY ROLES AND RESPONSIBILITIES	
A. Compliance Co-Ordinator.....	
B. Employees and Senior Management.....	
C. Complainant.....	
D. Senior Management's responsibilities.....	
COMPLAINT MANAGEMENT PROCEDURE	
A. Receipt of the Complaint.....	
B. Validating the genuineness of the complainant.....	
C. Information required while making a complaint.....	
D. Complaint handling and investigation.....	
E. Procedural fairness.....	
F. Time frame for verification.....	
G. Format of Verification Report.....	
H. Action on verification report.....	
I. Time frame for Investigation.....	
J. Format of Investigation Report.....	
K. Action on Investigation Report.....	
WITHDRAWAL OF COMPLAINTS BY COMPLAINANT.....	
CENTRAL RECORD OF COMPLAINTS.....	
MONITORING AND REVIEW OF COMPLAINTS BY MANAGEMENT.....	
A. Analysis and evaluation of complaints.....	
B. Complainant satisfaction with the procedures for investigating complaints.....	
C. Monitoring the complaint management procedures.....	
ANNEXURES.....	

COMPLAINT MANAGEMENT POLICY

DOCUMENT HISTORY AND VERSION CONTROL

Version	Date issued	Reason for issue	Author	Effective Date
V1	March 24, 2023	Adoption by Board	Bord	March 24, 2023

OVERVIEW

The Policy for Complaint Management is designed to provide guidance on the manner in Vessel Warehousing Private Limited receive and handles complaints against its employees, suppliers / contractors, etc. Complaints are to be directly or indirectly related to the business of Vessel Warehousing Private Limited. The objective of this Policy is to assist the Compliance team in the handling of complaints in an efficient, effective and professional manner wherein every possible step is taken to ensure that instances of misconduct do not escape scrutiny and action, while at the same time, the morale of the employees is not adversely affected by complaints of trivial nature. The Compliance Co-Ordinator may cause an enquiry into any complaint concerning the functions / activities of any of the projects / Entity.

Philosophy of complaint handling:

1. Complaints given are acknowledged immediately and Complainants will be treated courteously.
2. Each complaint is addressed in an equitable, objective, and unbiased manner in line with the Complaint Handling Policy.
3. There is no fee/cost to the complainant for making a complaint.
4. A person making false complaints is liable for prosecution and/ or disciplinary action.
5. Information regarding personal identity etc. of complainants shall not be disclosed, if so desired by the complainant.
6. The Compliance Co-Ordinator will ensure that the complaints are addressed in a transparent and fair manner within the specified/reasonable time frame.
7. Based on the feedback received, Vessel Warehousing Private Limited shall initiate necessary action for systemic improvements.

PURPOSE

The Vessel Warehousing Private Limited is committed to ensuring that all complaints are managed in a responsive and fair manner. This Policy aims to describe the main aspects of complaint handling within Vessel Warehousing Private Limited and to specify the terms and conditions applicable to the complaints handled at the Group level. It assists Vessel Warehousing Private Limited in evaluating any potential weak points in its policies, procedures, services and related risks. It deals with Complaints and the Complaint Management Framework where each type of complaint is addressed within the appropriate complaint-handling process as detailed in this Policy.

This policy aims to:

1. Ensure an open, accessible, and transparent complaint management system where feedback, suggestions and complaints are managed effectively, fairly, confidentially, and objectively.
2. Inform and identify where service improvements can be made.
3. Provide guidance on key principles and concepts of the complaint management system

SCOPE

This policy is applicable to the following parties of Vessel Warehousing Private Limited:

1. Employees
2. Senior Management
3. Board of Directors
4. Vendors
5. Customers
6. Public communities
7. Other parties as accepted by the Compliance Co-Ordinator taking the complaint into consideration

This Policy applies to complaints about, its services and functions originating from within and outside Vessel Warehousing Private Limited s. This includes, for example, complaints about:

1. Decisions made by employees of Vessel Warehousing Private Limited
2. Conduct of employees, including the quality of service provided
3. Policies, procedures, and practices of Vessel Warehousing Private Limited.
4. Staff grievances and Privacy complaints.

DEFINITION

For the purposes of this Policy, the following terms shall be understood as follows:

“Complainant” refers to any person having filed a complaint with the Vessel Warehousing Private Limited.

“Complaint” refers to receipt of information about malpractice or misconduct of deficiency of service, from whatever source. It has to be documented over a letter, written note, email, or any other mode from or on behalf of an eligible Complainant. It must be noted that simple requests for information or clarifications addressed to Vessel Warehousing Private Limited are not considered as complaints and are therefore out of scope of this Policy.

“Compliance Co-Ordinator” means Compliance in-charge appointed by the Board of Directors is known as Compliance Co-Ordinator.

“Complaints Management System” encompasses all aspects of the policies, procedures, practices, staff, hardware, and software used by Vessel Warehousing Private Limited for the management of complaints.

“Defendant” refers to the person / parties against whom a complaint is lodged. This can include employees, contractors, service providers and any parties involved with Vessel Warehousing Private Limited business and operations.

“Senior Management” includes Directors and above, Company secretary and Chief Financial Officer.

RISK MANAGEMENT

Complying with this Policy will considerably reduce risks associated with:

1. Inefficient and untimely handling of complaints.
2. Dissatisfaction by clients with Vessel Warehousing Private Limited.
3. Unfair, discourteous handling of complaints and breaches of complainant privacy.
4. Decisions made without transparency and objectivity.

GUIDELINES OF EFFECTIVE COMPLAINTS HANDLING

It is essential that Vessel Warehousing Private Limited attend promptly and fairly to all complaints. The following high-level rules must be remembered at all times:

1. A defendant may not investigate complaint / negative feedback against himself.
2. A defendant must not involve in a verbal abuse with the person who lodges a complaint.
3. A defendant must not, without proper authority, say anything to the person who lodges the complaint that could be used against Vessel Warehousing Private Limited as an admission of liability.
4. No verbal communication or explanation shall be allowed with media or any regulatory bodies, unless authorized by the Compliance Co-Ordinator.

SOURCES OF COMPLAINTS

Information about malpractice or misconduct or deficiency of service on the part of the employees, suppliers/ contractors etc. may be received from

1. Employees of Vessel Warehousing Private Limited
2. General public
3. Senior Management
4. Allegations in press
5. Surveillance checks
6. Any person connected to the business and operations of Vessel Warehousing Private Limited

CATEGORIES OF COMPLAINTS

A. Minor Complaints

Minor Complaints are complaints which do not relate to employees specifically or which can be categorized as minor complaints. They can be classified as follows:

- Leasing and service related: including pricing, marketing materials, disclosures which are relating to basic customer service features and offering
- Administration related: including data integrity, accuracy, timeliness of information or correspondences and operational services etc.
- Any other services or facilities provided Vessel Warehousing Private Limited.

B. Major Complaints

- The nature of complaints that fall within this scope can be broadly classified as follows:
- Acts involving fraud, dishonesty, or other offences of a similar nature; For example, any wrongdoing by an employee which may result in civil law violation, forgery of signature, misappropriation, unauthorized change, or instructions.
- Acts involving inappropriate advice, misrepresentation, or inadequate disclosure of information. For example, not having presented regulatory required offering documents / product brochures / marketing literature or improper recruitment advertisements.
- Any complaints made to regulatory or official bodies or the press or media
- Breach of any confidentiality obligations or misuse of client data
- Other misconduct involving non-compliance with any regulatory requirement
- A serious breach of Vessel Warehousing Private Limited Entities internal policy or code of conduct which would render an employee or appointed representative liable to demotion, suspension, or termination (e.g., requesting a client to sign on blank or incomplete form, not having Vessel Warehousing Private Limited offering documents or product brochure, not Vessel Warehousing Private Limited authorized marketing materials, misuse of client private data, inadequate services or recruitment advertisements etc.)

Employees who are the subject of complaints may also be subject to investigation and potential disciplinary action as Vessel Warehousing Private Limited is obliged to investigate and report such misconduct.

C. Anonymous Complaints

These are complaints where the complainant has not revealed a verifiable, traceable or contactable identity while making the complaint. While anonymous complaints are not encouraged, they are accepted. They may be lodged as a complaint in writing. Complainants are encouraged to provide as much information as possible which may be of assistance when assessing the complaint. It should, however, be noted that an anonymous complaint might be more difficult to investigate as, for example, further details of the circumstances relating to the complaint might be difficult to obtain, and it will be difficult to provide feedback on the complaint.

D. Identifiable or signed complaints

These are complaints wherein the identity of the complainant is mentioned by virtue of name, contact details etc. Further, the complainant owns/confirm the details mentioned in the complaint, when the complainant is contacted at the address/contact no. mentioned in the complaint.

E. Pseudonymous complaints

These are complaints wherein the identity of the complainant is mentioned by virtue of name, contact details etc. However, when the signatory of the complaint is contacted at the address/contact no. mentioned in the complaint, the complaint is either disowned or there is no response within a reasonable time.

F. Whistle Blower / Sexual Harassment complaints

Whistle Blower and Sexual Harassment complaints should be made and processed in the manner prescribed by the Whistle-blower Policy and POSH ("Prevention of Sexual Harassment") policy.

G. Matters not treated as complaints

Complaints which are not related to the business and services of Vessel Warehousing Private Limited are not treated as complaints. Complaints relating to Personal disputes are outside the scope of this Policy.

KEY ROLES AND RESPONSIBILITIES

A. Compliance Co-Ordinator

- Implements the policy and ensures its proper application with Vessel Warehousing Private Limited entrusted with the task of handling, centralization and follow-up of complaints.
- Responsible for informing the relevant staff of the existence of this Policy, including any changes thereto.
- Responsible for Analyzing data relating to complaints handling in order to enable identification and treatment of any recurring or systemic problem, as well as any potential legal and operational risks.

B. Employees and Senior Management

- Understanding and complying with the Complaint Management Policy and Procedures.
- Dealing professionally, promptly, and courteously with complaints and, where appropriate, providing assistance and information to people looking to make a complaint in accordance with this Policy.

C. Complainant

- Attempting to resolve the matter early by contacting the relevant employee directly to try to settle the issue or concern informally.
- If unable to resolve the matter informally, following the Complaint Management Policy to lodge a formal complaint.

D. Senior Management's responsibilities

- Overseeing the complaint handling and ensuring complaints are investigated and dealt with in accordance with the Complaint Management Policy.

- Ensuring a Compliance Tracker is maintained for monitoring and tracking complaints and reporting on actions and decisions.
- Ensuring the promotion of awareness of the Complaint Management procedures.
- Reporting to the Board annually on the efficiency of the Complaint Management policy and procedures.

COMPLAINT MANAGEMENT PROCEDURE

All complaints, however minor, are to be recorded and the following procedures must be followed.

A. Receipt of the Complaint

Complaints can be lodged by addressing the letter / e-mail directly to the Compliance Co-Ordinator through the E-mail (compliance_coordinator@xindustrialparks.com) / displayed in the Offices of Vessel Warehousing Private Limited giving specific facts of the matter. The complaints to be recorded by the recipient in the Complaint Form (Refer Annexure)

In instances, where an employee receives a complaint, the employee must direct the complainant to the Compliance Co-Ordinator. Compliance Co-Ordinator must keep the complainant informed of the progress of the measures being taken for the complaint's resolution.

B. Validating the genuineness of the complainant

Complainant needs to be contacted to verify the genuineness and also to clarify the gaps in information since, at times, the complainant may not be able to articulate the allegations properly. It is hence necessary that in all complaints where contact details are provided, the complainant is contacted, to verify the genuineness and also for additional information / clarification that the complainant could provide. Further, all signed complaints received from the complainant in person are to be acknowledged.

C. Information required while making a complaint

Complaints must contain factual details, verifiable facts and related matters. They should not be vague or contain sweeping allegations. Complaints which do not meet the above criteria may be dropped.

D. Complaint handling and investigation

The Compliance team gathers and investigates all relevant evidence and information on the received complaint. Once all necessary investigations have been carried out, the compliance team drafts and details any findings in relation to the complaint and any further steps to be taken. Progress and status are periodically provided to the Compliance Co-Ordinator.

The investigation process must be objective, reasonable and conducted in good faith. Decisions must be made on the weight of evidence and on the balance of probabilities.

- Investigating a complaint may include:
- Clarifying the details provided in a complaint
- Identifying actions taken to resolve the issue before the complaint was lodged
- Analyzing information from relevant file notes, correspondence and/or other sources
- Reviewing details of the complaint
- Reviewing documentation submitted by the complainant
- Reviewing previous administrative decisions or actions
- Interviewing complainants, employees and/or other individuals involved in the complaint
- Reviewing relevant policies, procedures, practices and/or legislation
- Reviewing previous complaints about the same issue.

E. Procedural fairness

A decision that directly affects the rights or interests of a person or organization must be made in accordance with the principles of procedural fairness. A decision maker is required to follow a fair

decision-making process, complying with two rules:

The rule against bias: “A decision-maker should have no personal interest in the matter to be decided, have no bias as to the outcome and act in good faith throughout the process” to be followed. Care should also be exercised to exclude perceived bias from the process.

The hearing rule: “The decision-maker must ensure the affected person is notified that a decision may be made and is given a reasonable opportunity to express their views before that occurs” to be followed.

F. Time frame for verification

The time frame for verification of a complaint (initial scrutiny of the complaint) is decided by the Compliance Co-Ordinator on initial validation and severity of the complaint. The time frame is subsequently communicated to the complainant. In cases where the Compliance Team requires more time than agreed to complete the verification, an interim reply should be sent to the Compliance Co-Ordinator and the Management, mentioning the reasons for the delay and the probable date for submission of the verification report. The time frame, however, in any given instances cannot exceed fifteen working days (15).

G. Format of Verification Report

The verification report should mention the complaint reference, allegations made in the complaint, findings, observation on the merits of the complaint i.e., whether allegations are true or not, time frame for investigation and supporting or documentation provided by the complainant.

H. Action on verification report

The Compliance Co-Ordinator on Analyzing the findings of the verification report submitted by the Compliance Team will provide inputs and will decide on one of the following actions to be taken

- To close the complaint if there is no merit in the allegations made in the complaint.
- To forward the findings to respective authorities as provided in the table below.

S.no	Findings	Action to be taken
1	Operational matters	Complaints are raised to General Operation Manager of each Entity for necessary administrative action. The Complaint is forwarded to the Operations Committee based on the severity of the complaint. Then, the Complaint is reported to the Board on the discretion of the Committee.
2	All other matters	Complaints are raised to Risk, Audit and Compliance Committee for necessary administrative action based on the severity of the complaint. Then, the Complaint is reported to the Board on the discretion of the Committee.

- To carry out a detailed investigation if the allegations are prime-facie true and point towards a vigilance angle.

In case the allegations in the anonymous / pseudonymous complaint are found to be true after verification or wherever verification has been called for under the belief that it is a genuine signed complaint and it subsequently comes out that the complaint is pseudonymous, the consent of the Compliance Co-Ordinator is mandatory in case investigation is required to be done.

The complaint is referred to the Law enforcement authorities, with the approval of the management, if the findings of the verification reveal that the allegations:

- Are criminal in nature (e.g., bribery, corruption, forgery, criminal breach of trust, possession of assets disproportionate to known sources of income, cheating, etc.,)
- Require inquiries to be made from non-official persons
- Involve examination of private records
- Need expert police investigation for arriving at a conclusion
- Need investigation abroad.

I. Time frame for Investigation

The time frame for carrying out a detailed investigation is two months. As and when advised by Compliance Co-Ordinator for an investigation, a detailed investigation report is to be submitted by the Compliance team within a time frame of two months. Investigation should be prioritized by keeping in view the severity of the complaint, officials involved, potential damage to reputation etc. In cases where the Compliance Team needs more time to complete the investigation, an interim reply should be sent to Compliance Co-Ordinator and the Management mentioning the reasons for the delay and the probable date for submission of the investigation report.

J. Format of Investigation Report

Investigation report shall be exhaustive, relevant, and structured so as to mention the source, gist of allegations, facts, observations, response of the concerned parties, counter to the response, conclusion, recommendation for action, recommendation for systemic improvement, if required and compensation to the complainant, if required.

K. Action on Investigation Report

The Compliance Co-Ordinator on Analyzing the findings of the investigation report submitted by the Compliance Team may decide on one or more of the following outcomes before submitting the observations to Management:

- Resolution of the complaint
- Disciplinary proceedings against defaulting parties
- Administrative action i.e., Warning/Recordable Warning, Advisory Memo etc.,
- Require for an apology from the defaulting party
- Changes to a service provided by Vessel Warehousing Private Limited
- Review of policies/procedures/practices and changes to those policies / procedures / practices
- Staff training
- Legal Action, based on the severity of the situation (E.g.: Fraud, Money Laundering)
- Any other action that deems fit

On arriving at a decision, the same is communicated to the Complainant and the complaint is closed. At the time of closing the complaint the investigating officer will update the Central Compliance Tracker with relevant details such as steps taken to address the complaint, the outcome of the complaint, any undertakings or follow up action required etc,

While taking a final view on the investigation report, the following care shall be taken:

- The advice of Legal Function (Outsourced / in-house) has to be sought in respect of complaints made against Board as well as Senior Management.
- If the investigation reveals that the involved employees are below the level of Senior management, the case will be generally dealt with by Compliance Co-Ordinator for advice to the concerned Disciplinary Authority. This is subject to the severity of the complaint
- Wherever a major penalty is recommended, a detailed investigation report has to be enclosed while submitting the case to the Management and the Legal Function (Outsourced / in-house) for further advice. Further action shall be taken based on the advice of management / Legal Function (Outsourced / in-house) as the case may be.

WITHDRAWAL OF COMPLAINTS BY COMPLAINANT

It is to be noted that once a Complainant confirms the complaint and investigation has been initiated by the Compliance team, it is not permissible to withdraw / stop the investigation, even if the Complainant requests for withdrawal or for stopping the investigation. The allegation contained in the complaint have to be taken to their logical conclusion once investigation has started.

CENTRAL RECORD OF COMPLAINTS

All complaints received Vessel Warehousing Private Limited Office shall be entered in a Central record of

complaints maintained for the purpose.

The Compliance Co-Ordinator will be responsible for ensuring complete and accurate recording of all information relating to a complaint. Details of each complaint should be contained within a discrete confidential complaint file which should contain all correspondences, interviews, findings, recommendations and internal approvals.

The file should also contain evidence of the steps taken to investigate the complaint including a summary of actions in respect of recommendations (if any) made.

To maintain confidentiality, access to information filed about a complaint should be restricted to the Compliance Co-Ordinator/ Compliance team/ investigation team as applicable.

The Compliance Tracker should at minimum contain the following information:

1. Reference number
2. Name of Client / Tenant
3. Name of complainant (if different from customer concerned)
4. Date of complaint
5. Details of complaint
6. Amount involved (if applicable)
7. Name of representative involved (if applicable)
8. Nature of complaint
9. Date of Acknowledgement Letter
10. Date of Settlement Letter
11. Manner of resolution and/or conclusion
12. Type of disciplinary action (if applicable)
13. Date of police report (if applicable)

MONITORING AND REVIEW OF COMPLAINTS BY MANAGEMENT

A. Analysis and evaluation of complaints

The Compliance Co-Ordinator will provide a biannual complaints report to the Management. This report will highlight the performance of the complaint management procedures over the previous six months and will include (but is not limited to):

- Number and nature of complaints received during the reporting period
- Number of complaints resolved during the reporting period
- Time taken to investigate complaints
- Issues arising from complaints
- Action to address systemic issues (if any)
- The number of requests received for external review of complaint handling

B. Complainant satisfaction with the procedures for investigating complaints.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of services and make improvements.

C. Monitoring the complaint management procedures

The Compliance Co-Ordinator will review the complaint management procedures on an annual basis to ensure the policy's suitability for responding to and resolving complaints. Any amendment or waiver of any provision of this Policy must be approved by the Board of Directors of the respective group entities.

ANNEXURES
COMPLAINT FORM

PART A FOR COMPLETION BY RECIPIENT OF COMPLAINT
Date of complaint
Recipient of complaint
Mode of receipt of complaint (by letter/telephone/email)
Name of Complainant
Relevant details of the complainant (e.g., company/address/telephone/email)
Name(s) of personnel involved against whom the complaint has been received
Monetary Value of compensation sought, if any
Details of the complaint
Details of investigation undertaken to resolve complaint
PART B FOR COMPLETION BY THE COMPLIANCE OFFICER
Date of receipt of complaint
Nature of complaint: Significant / Non-Significant
Date of complaint considered closed
Compliance Tracker updated Yes / No

Signature of Complainant

Date:

Place: