

Vessel Warehousing Private Limited

POLICY ON COMMUNICATION STANDARDS

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POLICY ON COMMUNICATION STANDARDS

DOCUMENT HISTORY AND VERSION CONTROL

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This Policy applies to communication in general, with existing clients and investors and prospective investors, all vendors and contractors who are creating or contributing to blogs, social networking sites, discussion forums, or any other kind of social media on behalf of the Vessel Warehousing Private Limited.

PURPOSE

The Purpose of this Policy is as follows:

- To encourage effective internal communication between the employees.
- To encourage effective communication with external stakeholders.
- To provide clear directions to all employees on how to communicate publicly available information of Vessel Warehousing Private Limited.
- To help employees understand the Vessel Warehousing Private Limited communication style regarding non-public information as well as the people authorised to handle such information.
- To clarify the restrictions on communication with the media.
- To streamline the process of accepting public speaking appointments.
- To set out the principles governing the use of social media by employees

VERIFICATION AND ACCURACY OF COMMUNICATIONS

Employees must have a reasonable basis for statements made in communications to investors, media etc., and they must use accurate, clear, and appropriate language in such communications. Employees must use only original content. Plagiarize or copy content from any source should be avoided.

Note: Plagiarism is misconduct and can carry disciplinary penalties. Advisable to always check and seek advice from Compliance Co-Ordinator first.

Employees must exercise professional judgment and discretion with respect to the appropriateness of each statement made or the probity of its omission. Statements that contain unwarranted superlatives should be avoided.

Information provided to clients must not omit any information that might result in the information provided being misleading. Translations of any materials must be accurate.

BUSINESS COMMUNICATIONS

1. All business communication from Vessel Warehousing Private Limited must be on official-headed paper and state the originator's name or some other reference to identify him.
2. Correspondence relating to Vessel Warehousing Private Limited business may not be issued by any employee on personal or non-headed paper.
3. Making false or misleading statements either fraudulently or negligently increases the risk of Vessel Warehousing Private Limited being sued by clients / investors / vendors etc.

4. Vessel Warehousing Private Limited require that all communications with stakeholders must be fair, clear, and not misleading.
5. Employees should not comment on any specific Vessel Warehousing Private Limited, business or affairs regardless of whether the company is a client or not.
6. Employees should not criticize the activities of the competitors or other organizations when talking to the journalists (or anyone else).
7. Employees should not endorse clients' or suppliers' products or services without appropriate internal consultation or approval.

DISCLOSURE OF INFORMATION TO PUBLIC

A. General Disclosure to the Public

Employees may provide members of the public the following information upon request:

- the full name of Vessel Warehousing Private Limited
- the address, phone, and fax numbers of the members of Vessel Warehousing Private Limited
- the name, position and contact details of the employee with whom a person is dealing the names of its directors or employees, including information about whether they are registered with regulators; and
- Information about Vessel Warehousing Private Limited registration with regulators.

CONTACT WITH THE PRESS OR ELECTRONIC MEDIA

All contact with the press or electronic media shall be originated from or approved by the “Board of director / representative of shareholder”.

Employees may not, without specific approval from the “Board of director / representative of shareholder”, provide information (background or otherwise) either on an attributed or non-attributed basis to the press or electronic media in relation to any matter including the business of Vessel Warehousing Private Limited, its investors (or their business), the funds or any investee companies.

Vessel Warehousing Private Limited has no political affiliations and will not comment on any political party, leader, or government officials.

Employees could come into contact with journalists on aspects / events relating to social or business activities. Employees need to be careful about what is being communicated and how it would impact the individual and the Vessel Warehousing Private Limited.

A. Social Media Guidelines

In the rapidly expanding world of electronic communication, social media can mean many things. Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, Twitter, Instagram, Facebook, etc., whether or not associated or affiliated with Vessel Warehousing Private Limited, as well as any other form of electronic communication.

Three basic beliefs apply to activities online:

- Be Responsible

Employees are solely responsible for what they post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any conduct that adversely affects job performance, the performance of fellow associates or otherwise adversely affects members, customers, suppliers, people who work on behalf of Vessel Warehousing Private Limited, legitimate business interests may result in disciplinary action up to and including termination.

- Be respectful Always be fair and courteous to fellow associates, customers, members, suppliers, or people who work on behalf of Vessel Warehousing Private Limited. Also, work-related complaints to be resolved by speaking directly with co-workers than by posting complaints to a social media outlet. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion, or any other status protected by law or Vessel Warehousing Private Limited policy.
- Be honest and accurate
Make sure that information or news posted is always honest and accurate, and if any mistakes made, correct it quickly. Never post any information or rumours that are known to be false about Vessel Warehousing Private Limited, fellow associates, members, customers, suppliers, people working on behalf of Vessel Warehousing Private Limited or competitors. Post only appropriate and respectful content
 - a. Maintain the confidentiality of Vessel Warehousing Private Limited trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures, or other internal business-related confidential communications.
 - b. Respect financial disclosure laws. It is illegal to communicate or give a "tip" on inside information to others so that they may buy or sell stocks or securities. Such online conduct may also violate the Insider Trading Policy.
 - c. Express only personal opinions. Never represent as a spokesperson for Vessel Warehousing Private Limited. If Vessel Warehousing Private Limited is a subject of the content any person is creating, be clear and open about the fact and make it clear that personal views do not represent those of Vessel Warehousing Private Limited, fellow associates, members, customers, suppliers, or people working on behalf of Vessel Warehousing Private Limited.
 - d. If anyone publishes a blog or posts online related to the work or subjects associated with Vessel Warehousing Private Limited, make it clear that person is not speaking on behalf of Vessel Warehousing Private Limited. It is best to include a disclaimer such as "The postings on this site are their own and do not necessarily reflect the views of Vessel Warehousing Private Limited."

B. Using social media at work

Refrain from using social media while on work time or on equipment / assets provided unless it is work-related as authorized by manager. Do not use Vessel Warehousing Private Limited email addresses to register on social networks, blogs or other online tools utilized for personal use.

C. Confidentiality and privacy

Responsibility to protect client relationships and uphold Vessel Warehousing Private Limited commitment to confidentiality and privacy of client, personal information is with every employee. Quick reactions in social media can pose a greater risk to breaching confidentiality.

D. Third party content

Do not re-use, post or otherwise use any client or third party-owned material (such as client logos or online videos or images) on behalf of Vessel Warehousing Private Limited or in a manner that could reasonably be attributed to Vessel Warehousing Private Limited unless you have permission from the rights holder. In particular, do not use any client trademarks or logos without express permission from the client.

E. Mentioning company names/clients in social messages

Employees should avoid using company or client names in social media posts. If there is an exception and you have a compelling reason to mention a company name/client in your social post, you must obtain necessary approval/clearance from the Compliance Co-Ordinator

F. Retaliation is prohibited

Vessel Warehousing Private Limited prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another associate for reporting a possible deviation from this policy or for cooperating in an investigation will

be subject to disciplinary action, up to and including termination.

G. Media contacts

Employees should not speak to the media on Vessel Warehousing Private Limited behalf without contacting the Compliance Co-Ordinator. All media inquiries should be directed to the Compliance Co-Ordinator.

GUIDELINES FOR PRODUCTION OF MARKETING MATERIALS

A. General Guidelines

The following general guidelines apply when any marketing publication or advertisement of either a corporate or product nature is produced. This section also applies to any materials released via a website.

Employees must ensure that any information contained in marketing material is true and fair and be presented in a clear and effective manner.

Employees must ensure that the information contained in marketing materials does not have any misleading or potentially misleading effect.

Employees must not dishonestly conceal or withhold material facts or include information that is false in a material way.

Employees must ensure that all marketing materials are dated and kept up to date, if necessary, by way of reprint, during such period as they are used.

B. Due Diligence Review Procedure

Prior to the issue of any marketing materials, a due diligence review shall be completed by the Compliance Co-Ordinator to ensure that statements made in the documentation are reasonable and can be supported. There must be no misrepresentations and no material information should be omitted.

CRISIS COMMUNICATION

A crisis is a situation that threatens the integrity or reputation of a company. Often, with the media highlighting the issue, the situation may have the potential to spiral out of control. While each situation is unique and evaluated individually, formal parameters of a crisis include:

- A significant event that prompts widespread, often sustained news coverage and public scrutiny
- An event that has the potential to damage an organization's reputation, financial stability, or image
- An event that due to its volatility, creates high levels of uncertainty
- An event in which some type of internal action, policy change or organizational structure alteration is necessary for resolution.

A. Categories of Crisis

1. Internal crisis

- Employee retrenchments
- Workplace violence
- Adverse commentary by employees/ internal stakeholders on social media.
- IT System failures
- Investor grievances
- Harassment

2. External crisis

- External fraud
- Natural disasters
- Accidents (fire, building collapse)

- Adverse media publicity through print, digital or social media, either by irate investors, local associations, or the media itself.
- Customer affected due to third-party offence
- Rumours/speculations
- Cyber theft / hacking
- Major complaint against “Board of director / representative of shareholder”

B. Responding to a Crisis

Board of each Vessel Warehousing Private Limited creates an operation team that will handle all communication responsibilities that may arise due to a crisis. The roles of the members of this team should be well defined. This will then ensure that at times of crisis, each member knows the exact role that s/he has to perform and there is no time lost.

The decision to empower employees at all levels to come forward and report any seemingly irregular event to his/her immediate supervisor may avert a larger crisis

C. Responsibilities of the operations team

- Responsible for gathering information, verifying the exact nature of the crisis, and deciding on the response. To find out the correct sequence of events and designate a member of the team to compile a list of ‘what we know’ and ‘what we don’t know’.
- Prepared to assemble and address a situation as soon as it arises
- Track the regional/national/social media and closely monitor media calls
- Closely tracks the crisis communication across various mediums to understand if Vessel Warehousing Private Limited have been mentioned in the concerned company/client’s complaint statement
- Refrain from proactive communication while closely tracking the communication when the Entities name is not mentioned,
- Determine whether immediate response to media is appropriate
- Prepare a news release/press statement with key messages related to crisis
- Issue all press statements across communication mediums on behalf of the organization as a whole
- Identify the primary spokesperson and keep that person updated throughout the duration of the crisis
- Ensure that all staff, board members, or others who may be contacted, know where to channel media inquiries. Other spokespeople may be designated as back-ups, but no one should speak to media without first coordinating with the primary spokesperson/operations Team
- Establish a clear protocol for who will approve all communications before any dissemination.
- Make appropriate arrangements necessary for continuous communication throughout the duration of the incident, including designating back-up spokespeople and making provisions for responding to media beyond office hours
- Have a dedicated team to log all calls that come in, since a crisis can result in a flood of media inquiries that may be local, regional, or national. Since Vessel Warehousing Private Limited has properties situated throughout India, equal attention should be given to regional media - both electronic and print along with the National media.
- To seek resolution since often the duration of crisis damages reputation and morale rather than the content. It is definitely unhealthy for any organization to be in a crisis for an indefinite period.
- In Vessel Warehousing Private Limited case, since the target audience is/ are businesses, commercial customers, the organization stands the risk of these stakeholders getting nervous and concerned with negative publicity. This holds true even if the organization is not at fault. The Operations Team should act decisively to try to bring a crisis to closure as soon as possible.
- Once the crisis has been resolved, the leader of the Operations Team should be responsible for conducting an evaluation study. It is a must for the “Board of director / representative of shareholder” to be a part of this review as its useful insights will help manage a future crisis much better
- Receive media inquiries and initiate contact with the media when appropriate. As a general rule, try to inform the crisis to employees and other essential stakeholders first or simultaneously with the news media. Throughout the crisis, keep key stakeholders informed about what the operations team doing and why

D. Briefing spokespeople

Spokespeople scheduled to talk to the media should be provided brief background information in advance of the interview. This policy should be followed even if the interview is a brief phone call.

a. Background information should include the following:

- Date, time, and location of the interview.
- Name of the reporter.
- Name of the publication, wire service or channel.
- Organization's experience with the reporter or publication to help the executive understand the degree of caution needed in this interview and to prepare for the specific reporter's approach.
- Subjects/issues/questions to be covered as requested by the reporter.
- Position of the spokesperson or recommended response and the data needed to discuss these subjects.
- Key messages to communicate in the interview.
- List of other executives to be interviewed during this visit, including key topics and messages you suggest the other executives' cover.
- Issues, if any, that the spokesperson should avoid and tips on how to sidestep them.
- Background information/statistics that would be useful in the interview.
- Proposed length of the interview.

E. Crisis manual

The manual should be distributed to those leaders in the organization who may be called upon during a crisis, depending upon its gravity.

Typically, the list would include:

- Executive Director
- Finance Controller
- Other business heads
- Corporate communication team

The crisis manual should have the following:

- Checklist prior to going public after evaluating the aspects of situation with information
- Situational Assessment questionnaire
- Preparation of action plan
- Category of crisis and crisis scenario's along with suggested steps as listed below Vessel Warehousing Private Limited has identified the top potential crises it would be most likely to face. Below are sample responses.

Category I (Low Severity)	Category II (Medium Severity)	Category III (High Severity)
Dissatisfied customer	Workplace violence	Series of senior leadership exits
Technology glitches leading to loss/negative impact on clients' business	Any incident/attack involving Vessel Warehousing Private Limited employee/s outside the office premises	Issuing pink slips to large number of employees
Security breach/cyber theft/hacking	Death/severe injury to employee due to accident while at work	Insider trading/ wrongdoing

Online fraud/External fraud	Sexual harassment of an employee	Organizational misdeed
Social media trolls/Adverse media publicity	Terror attack threat	Rumour/speculation
Natural calamities/issues beyond human control	Alleged discrimination	
Whistle-blower	Adverse commentary by employees/ internal stakeholders on social media	
Terror money		
Account opening through fake documents		

Crisis scenario

Crisis Example Scenarios & Response: Category I

Crisis	Recommended Steps
Technology glitches leading to loss/negative impact on clients' business	Any such possible cases should be flagged off well in advance and a statement clarifying Vessel Warehousing Private Limited stance should be kept ready
Security breach of sensitive customer data within the organization	Provide clarity to the media about the breach, and the action being taken by the company to control damage
Social Media trolls	The company needs to have complete details of the issue
Natural calamities/weather issues	Obtain an immediate update on the situation and damage and keep a note ready on all measures taken by the company to minimize impact /rectify damage
Legal case on company for alleged illegal activities	Statement to be issued based on the nature of allegation and status of investigation
Whistle-blower	Get an immediate update on the situation and communicate company's views on the same.
Terror Money	The company needs to have complete details of the fraud and steps taken

Crisis Example Scenarios & Response: Category II

Crisis	Recommended Steps
Workplace violence	Respond with statement that clarifies the situation, identifies the cause, and specifies steps taken by company for the victim and against the attacker
Any incident/attack based on the investigation. involving Vessel Warehousing Private Limited employee/s outside the office premises	
Death/severe injury to accident of employee while at work	The company needs to have complete details of the cause of accident and status of employee's health in case of injury.
Terror attack threat	Communicate steps taken by the company to avoid possible attack
(Legal case against an employee for personal issues)	Vessel Warehousing Private Limited should not react if the situation is beyond the company's control

Crisis Example Scenarios & Response: Category III

Crisis

Crisis	Recommended Steps
Series of senior leadership exits creating vacuum at the top management level	The company should acknowledge these exits and how it plans to vacuum created
Giving pink slips to large number of employees/downsizings	Clarify the procedure followed for involuntary exits based on transparent evaluation systems
Insider trading/ wrongdoing by an employee affecting business	Communicate the investigation being done by the company and action taken for damage control and against the employee in question.
Organizational misdeed: management actions that put employees at risk and/or violate the law	The matter is at sub jurisdiction

Understanding social media crisis:

- In the current digital age, reputation risks can emanate from various stakeholders - internal and external.
- A measure to qualify an issue as a social media crisis would be the volume of negative conversations observed in a short duration of time that are directly related to corporate reputation.

Social Media Crisis Scenarios:

Scenario I: Glitches, faulty product, or service issues

Customer complaints on social media and other communication channels like Telegram Complaints tagging media, influencers, corporate and industry stakeholders

Scenario II: Employee Involvement

Leakage of confidential information on web and social media

Negative conversations about a colleague/reporting manager/organisation on policy, culture, or financials
Uncharitable comments on competitor brands or industry
Negative comment about client(s)

All conversations indicating a strong political, anti-national, gender, race, caste, and religious bias
Engaging with an influencer media, bloggers, etc. on social channels without prior consent

Scenario III: Media, Bloggers & Influencers Involvement

Misrepresentation of facts that become talk points for social conversations
Negative story published, widely shared, and commented on social media

Scenario IV: External Stakeholder Involvement

Corporate/ Board of directors misconduct disclosed by 3rd party users

Negative information related to corporate/ Board of directors history disclosed on social media channels
Civil activism by a key stakeholder (NGO, political party, corporate, etc.)
Data security breach by hackers or data theft

Malicious rumours circulated by users about the corporate/ Board of directors

Scenario V: Client Involvement

Use of abusive language against corporate/ Board of directors
Complaints on service/product

- Claims that competition has better product or services
- Consumer activism

Scenario VI: Miscellaneous Triggers

Spam comments or promotional comments by other brands or service providers that have a negative bearing on Vessel Warehousing Private Limited. End users mention the company on a satirical, humorous, or negative trend to highlight issues

F. Understanding Social Media Crisis:

- In the current digital age, reputation risks can emanate from various stakeholders - internal and external.
- A measure to qualify an issue as a social media crisis would be the volume of negative conversations observed in a short duration of time that are directly related to corporate reputation.

Snapshot of what Impacts Reputation Online:

Search: One of the major contributors to initial perception about a brand online, as it's predominantly the first access to information for a majority of internet users

Online news media and influential bloggers: Enjoy a sizeable following and act as catalysts to more conversations, positive or negative

Social media and instant messaging channels: Used for sharing content and messages as broadcast or 1-to-1 amongst stakeholders, could lead to potential reputation risks

Open & closed networks of key stakeholder groups: Retail investors, consultants, media, clients, etc. present on relevant platforms (forums, communities, message boards, etc.)

Viral content: Builds on existing perception or challenges opinion and it is immensely popular and shareable through networks

Mass media: Plays an important role in setting an agenda for conversations amongst users online

G. Methods of Engagement:

- Remove content from platform: Recommended only when there is no grey area in the fact that the comment/post/news is utmost malicious and untrue
- Seed conversations - company:
 - A direct response from the company to the consumer with a view to resolve issue
 - Seen to have reduced negative opinion online
- Seed conversations – users: Defend company position through seeding conversations from 3rd party users (created/actual) to achieve balance in discussion
- No response, ignore:
 - Ignore when there is a possibility of the negative conversation to spiral online if engaged with
 - Ignore if the post is insignificant

H. Post crisis response/evaluation

Once a crisis has subsided, the company must evaluate the success of the crisis communications response. This is to ensure business continuity and will allow to make any adjustments to future crisis planning.

Analyse root cause: Study the actual/likely reasons for the crisis and identify vulnerabilities/gaps that triggered it.

Document lessons learned: Document in detail the lessons learned, taking inputs from all involved in the crisis resolution initiative and edit/improve upon existing processes/strategy Review post crisis evaluation on

following page to determine what was successful and what needs improvement. Edit crisis plan to reflect any additional or different strategies.

Utilise a Post-Crisis: Assess the performance of our first response, follow-up, and next steps. All the crisis response unit members should rate from 1-5, giving reasons as to why you ranked your performance this way. The learnings will be applied for the next situation; each person should document them in the next steps column.

Comprehensive internal report: A post crisis report should be created by Operations Team Head or another core operations team member that identifies the steps taken during the crisis to respond, addresses issues and mitigates damage. It will outline the outcomes of the situation and highlight the key messages that resonated throughout media coverage during the crisis.

I. Communication to Stakeholders and/or Investors

- The decision to inform or update various stakeholders on any ongoing or potential developments may be evaluated from some of the following aspects:
- If the matter reported or sought to be by media issue is a material event that has the potential to have a significant bearing on the operational performance and business continuity on any entity or its business or the stakeholder directly or indirectly
- To what extent the information reported by the media is factually incorrect and has the potential to adversely impact the reputation of the company or the stakeholders named therein or may create an adverse perspective of the investors. This could pertain to claims made in the news report and if they are exaggerated or misleading.
- Another aspect that needs to be considered is whether the matter pertains to any ongoing regulatory or litigation issue, wherein sharing any additional information beyond what is shared with these bodies or already shared in the public domain may not be possible. Depending on the nature of such enquiry/proceeding, stakeholders may not be updated in certain scenarios. For instance:
 - A routine regulatory enquiry may not be necessarily communicated to the stakeholders/investors.
 - Any internal communication that is merely in the nature of allegations may not be shared with anyone from outside the organization till the time finality has been attained and it is required to be disclosed. Till that time, it may be disclosed on a need-to-know basis.
 - Whistle-blower allegations may be communicated as per applicable law and internal policies.

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Work undertaken and documents created by employees during the course of their employment shall be the property of Vessel Warehousing Private Limited and the copyright in respect of that work or documents shall remain, at law, with Vessel Warehousing Private Limited. Leaving the employment Vessel Warehousing Private Limited, either by way of termination or resignation, does not entitle the employee to take hard or soft copies of the work or documents with him. Any attempt to take such information (whether by photocopying, downloading to disk or emailing to an outside email address) may constitute theft Vessel Warehousing Private Limited will demand the employee to return any such information, unless specifically authorized, and will not hesitate to bring the matter to the attention of both regulatory authorities and the police, where necessary.

MONITORING AND DISCIPLINARY ACTION

Vessel Warehousing Private Limited shall monitor and may look into any Media / social media interaction by any employee. Further, it shall monitor comments or discussions by any employee on Media. If in the company view, any comment made by an employee on Media violates this Policy. Vessel Warehousing Private Limited can seek clarifications and if required, ask the relevant employee to get that comment modified or deleted from the relevant Media platform(s).

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

REVIEW OF POLICY

The policy shall be reviewed periodically (at least on an annual basis) by the Board or such individuals or committees of individuals authorized to do so. Any change/amendments to this policy shall be approved by the Board of Directors of the Vessel Warehousing Private Limited. Any change/amendments in applicable laws shall be deemed to be covered in this policy without any review.