

Vessel Warehousing Private Limited
POLICY ON CODE OF CONDUCT

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POLICY ON CODE OF CONDUCT

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

PREFACE

The Code of Conduct is the central policy document, outlining the requirements that everyone working for and with Vessel Warehousing Private Limited must comply with.

The Vessel Warehousing Private Limited is committed to preserve its integrity and reputation by complying with laws and regulations in each of the markets in which it operates. It invests in people and partners, enable continuous learning, and build caring and collaborative relationships based on trust and mutual respect

SCOPE & PURPOSE

The Code is for everybody working for and/or on behalf of the Vessel Warehousing Private Limited, which expects everyone who represents the Vessel Warehousing Private Limited to uphold the same standards and to abide by our Code and policies. Failure to do so may invoke disciplinary action.

Employees are expected to observe high standards of conduct and be aware of the laws and regulations of other countries when conducting cross border transactions. If an employee needs help finding or understanding a policy, or in case if an employee needs any clarification or guidance on the Code, he/she must speak to the Compliance Coordinator.

The Vessel Warehousing Private Limited expects employees to:

- Behave in an ethical manner, taking pride in our actions and decisions.
- Comply with the principles and rules in our Code and fulfil our legal and regulatory obligations.
- Seek guidance wherever required if we feel a working practice is not ethical or safe.
- Report non-compliance or breach of our Code immediately.

DEFINITIONS

Related Party: “Related Party” means

- a director, Key managerial personnel or his relative
- a firm, in which a director, manager or his relative is a partner
- a private company in which a director or manager is a member or director
- a public company in which a director or manager is a director or holds along with his relatives, morethan two per cent. of its paid-up share capital
- anybody corporate whose Board of Directors, managing director or manager is accustomed to act inaccordance with the advice, directions or instructions of a director or manager
- Such other person as may be prescribed under The Companies Act and SEBI LODR as amended fromtime to time.

Relative: Relative in general will mean an individual, Company, associate, members of HUF or firm with whom employee, either directly or indirectly, may have a relation or interest, which can influence or even appear to influence our decisions made on behalf of the Company. Also, includes a spouse or spouse equivalent of a person, and includes parents, siblings, children/stepchildren of such person or of the spouse, Son-in-law, Daughter-in-law any of whom is either dependent or not, relatives, present or past business partners and

includes any other person who receives substantial financial support and over whom significant influence is exercised or consults such person in taking decisions relating to investments / trading in securities.

Gifts and entertainment: “Gifts and entertainment” include anything of monetary value offered/received by an individual either directly or indirectly for the purpose of expressing gratitude. Gift includes cash and noncash items, some examples of which are: artwork, watches, jewelry, equipment, services, prizes, gift vouchers, donations to charities, use of vacation facilities, stocks or other securities, home improvements, tickets/invitation to sports, cultural or any other event. However, this does not include reasonable expenditure incurred on account of routine business courtesies offered to or received by any business partner as a customary trade practice (e.g., providing transportation, meals, etc).

Sensitive Information: “Sensitive Information” or “Unpublished Price Sensitive Information” or “UPSI” or “Insider Information” means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: (i) financial results; (ii) dividends; (iii) change in capital structure; (iv) mergers, de-mergers, acquisitions, delisting’s, disposals and expansion of business and such other transactions; (v) significant changes in policies, plans or operations of the Company, and material litigation; (vi) changes in key managerial personnel; and (vii) *material events in accordance with the listing agreement Words and expressions used and not defined herein shall have the meanings respectively assigned to them under Prohibition of Insider Trading (PIT) Regulations, issued by SEBI and amended from time to time.

*Applicable only to Listed Entities

Fraud: “Fraud” in relation to affairs of any establishment, includes any act, omission, concealment of any fact or abuse of position committed by any person or any other person with connivance in any manner, with intent to deceive, to gain undue advantage from, or to injure the interests of, the Company or its shareholders or its creditors or any other person, whether or not there is any wrongful gain or wrongful loss.

Personally Identifiable Information: “PII” is defined as any information that identifies an individual such as name, physical address, email address, government IDs, credit cards or bank account details, photo, video, or any combination of that information that might identify an individual.

Intellectual property: “Intellectual property” includes any Company owned information like: patented inventions, designs, copyright materials, trademarks and service marks, trade secrets and know- how, sales, marketing and other corporate databases, marketing strategies and plans, research and technical data, business ideas, processes, proposals or strategies, new product and/or package design, and development software bought or developed by the Company, or information used in trading activities including pricing, marketing, and customer strategies.

Harassment: “Harassment” is behaviour that creates an offensive, intimidating, humiliating, or hostile work environment. Harassment may be physical or verbal and may be done in person or by other means (such as harassing messages or emails). It is important to remember that harassment, sexual or otherwise, is determined by our actions and how they impact others, regardless of our intentions. Examples of such harassment include unwelcome sexual advances or remarks, offensive jokes and disparaging comments, sexually explicit graphics, pictures, videos, animation, etc.

Bribery & corruption: A ‘bribe’ is anything of value, including money, gifts and entertainment, other business courtesies, hospitality, or personal gratification given, offered, or received in an attempt to influence a person’s behaviour, in order to obtain or retain business, or to secure an unfair benefit or advantage.

‘Corruption’ is dishonest behaviour by those in positions of power, such as managers or Government Officials. Corruption can include giving or accepting bribes or inappropriate gifts, diverting funds, laundering money, and defrauding investors.

Facilitation payments and Kick back: Facilitation payments are small expediting or ‘grease’ payments made to Government Officials to facilitate or expedite the performance of a routine, non-discretionary governmental action that a Government Official is already obligated to perform, such as issuing certain permits, licenses, visa etc,

A kickback is a form of negotiated bribery in which a commission is paid to the bribe-taker as a Quid Pro Quo for services rendered. The remuneration (money, goods, or services handed over) is negotiated ahead of time. The kickback varies from other kinds of bribes in that there is implied collusion between agents of the two parties, rather than one party extorting the bribe from the other. The purpose of kickback is usually to encourage the other party to cooperate in the illegal scheme.

MAINTAINING ETHICAL BUSINESS STANDARDS

A. Prevent conflict of interest

The employees are expected to act in the best interests of Vessel Warehousing Private Limited and exercise sound judgment when working on its behalf. This means that business decisions should be made free from any conflict of interest. Even the appearance of a conflict can affect an individual's and/or the Company's reputation. Employees are expected to disclose all situations relating to conflict of interest voluntarily as soon as he/she has the knowledge of the same. Read Conflict of interest policy for more information.

B. Outside Employment

During employment with Vessel Warehousing Private Limited, one shall not engage in any vocation, training, employment, consultancy, business transaction, or any other activity, including serving as a director, trustee, officer, or advisory board member, which conflicts with the interests of the Company, in any capacity whatsoever whether for any consideration or not. Refer Conflict of interest policy for the approvals and more information.

C. Dealings with Relatives

If an employee seeks to engage in or enter any financial or non-financial dealings with a related party, relative or a related party of a relative, directly, or indirectly, in their capacity as an employee of Vessel Warehousing Private Limited, the employee must seek approvals of the potential or actual conflict of interest situation from the Reporting Manager and ensure that employees are in no way directly or indirectly influencing the decisions with respect to such party. Refer Conflict of Interest Policy for approvals and more information.

D. Engaging vendors, customers, or any other business partners for personal use

Employees should not accept favours of any kind from vendors, customers, or any other business partners of the Company. Employees should not utilize Company vendors, customers, or any other business partners for personal use, on terms other than those available to the public or those established by Company policy, unless employees have disclosed the same to the Compliance Co-Ordinator. Such disclosure should be accompanied by both the particulars and value of the products or services availed.

E. Outside Investments

Employees should not make or hold a significant investment in any entity that competes with, does business with, or is seeking to do business with the Company, without taking an approval of the Compliance Co-Ordinator. An interest is considered 'significant' if it could impair, or reasonably appear to impair, the employee's ability to act in the best interests of the Company.

F. Involvement in Political Activities

Vessel Warehousing Private Limited does not support any specific political party and does not have any political affiliation. Therefore, no contributions should be made, on behalf of the Company, either directly or indirectly, to any political party or for any political purpose without prior approval from the Board of Directors.

Employees cannot use their job title or Company affiliation in connection with political activities. Employees should ensure that they do not give an impression of representing or being the spokesperson of the Company while getting associated with any political party or political activities in their personal capacity.

Employees should not comment on any political process except in those matters that have a bearing on the operations of the Company. Vessel Warehousing Private Limited might engage in policy debate on subjects of legitimate concern to the Company, its staff, and the communities in which it operates in various ways, including lobbying. Since such activities have a bearing on the operations of the Company, it should be done by authorized persons only.

Vessel Warehousing Private Limited shall co-operate with the Government and Trade Associations in matters concerning the industry, with a view to promoting, protecting, and enhancing our business interests.

G. Anti-bribery & corruption

- Vessel Warehousing Private Limited follow a zero-tolerance policy for bribery and corruption or facilitation payment in any form, whether in government or non-government dealings and prefer forgoing business opportunities rather than paying bribes. Each one of us should ensure at all times that we follow all the applicable international and local anti-bribery and anti-corruption laws.
- Encourages anti-bribery and anti-corruption practices amongst everyone working on behalf of the Vessel Warehousing Private Limited. We should not knowingly allow, or ignore signs of someone acting on our behalf, paying or receiving any bribe, kickback or facilitation payment.

If anybody requests or offers a bribe or kickback, it should be refused and must be immediately reported to the Compliance Co-Ordinator. Refer to the Anti-bribery & corruption Policy for further information.

H. Gifts and Entertainment

In general, employees are not encouraged to accept or offer (directly or indirectly) gifts or entertainment from past, current, or prospective customers, suppliers, distributors, dealers, or any other business associates of the Company. Employees should promptly refuse to accept or offer gifts or entertainment. However, it is sometimes considered customary to offer or receive gifts. In such situations employees should consider the categories of gifts and entertainment as described in the Conflict-of-Interest Policy for arriving at a decision to accept or offer.

In cases where a gift or entertainment received is not acceptable as per the Code or where an approval is not granted by the Reporting Manager, the receiver of the gift or entertainment is obliged to return the gift or the value of the entertainment to the giver. Gifts which cannot be returned to the giver should be deposited with the HR representative at the location.

COMMITMENT TO BUSINESS ASSOCIATES, SUPPLIERS, CUSTOMERS AND ENVIRONMENT

A. Ensuring Product/ Service Quality

Quality is our most valued asset, and it remains at the core of our business policy. Vessel Warehousing Private Limited seek to satisfy our customers' high quality and safety standards, despite the ever-increasing complexity of products / service quality and systems.

B. Responsible Marketing

Vessel Warehousing Private Limited compete vigorously and effectively with fairness and honesty of purpose. Honesty is the guiding principle in all our sales, marketing, and advertising pursuits. Vessel Warehousing Private Limited ensure that only complete, factual, and truthful statements about the Company and its products and services are made in all our advertising or marketing campaigns.

C. Commitment to our Customers

Vessel Warehousing Private Limited treats customers ethically, fairly, and in compliance with all applicable laws, and earn our business based on customer service and competitive pricing. The company does not enter any kind of unfair or deceptive trade practices to win any deal or customer and respects customers 'right to privacy' in relation to their personal data. Customer complaints and concerns should be attended to the fullest satisfaction of the customer.

D. Commitment to our Suppliers and Business Associates

1. Vessel Warehousing Private Limited ability to add value to the Company's products or services or help fulfil the strategic growth plans of the Company.
2. Vessel Warehousing Private Limited selects goods and services that best contribute to the long-term well-being of the Company.
3. Vessel Warehousing Private Limited choose suppliers based on competitive price, quality, delivery, service, reputation, environmental, and business practices. The company also expects suppliers to support our core labour standards and abide by all applicable local and international laws.

4. Vessel Warehousing Private Limited treat its suppliers and subcontractors with fairness and integrity. The company respects the terms and conditions of its agreement with suppliers and honours commitments.

E. Anti-trust and Competition Law

Vessel Warehousing Private Limited seeks to compete fairly, ethically, and within the framework of all applicable competition laws. Anti-competitive practices can damage the business and reputation of the Company.

The competition laws protect competition by prohibiting anti-competitive behaviour. This behaviour may include:

- Entering into anti-competitive agreements with competitors, including price-fixing, bid-rigging, market allocation and agreements to restrict supply
- Exchanging sensitive information with competitors

Vessel Warehousing Private Limited should not seek information about competitors using theft, deception, misrepresentation, or any other illegal or unethical means.

F. Commitment to environment

The mechanism used in the construction of buildings shall not result in effluents or toxic waste being released unless it is treated in accordance with the prevalent pollution control laws. Every possible effort shall be made by us to maintain the ecological balance, conserve scarce natural resources, and avoid pollution.

Vessel Warehousing Private Limited policy is that operations, products and services, while meeting regulatory requirements should also accomplish their functions in a manner that protects health and the environment.

Vessel Warehousing Private Limited are committed to work for the upliftment and betterment of the communities it operates in. The company considers the impact on biodiversity in business activities and seeks to avoid any project or activity that is detrimental to the wider interests of the communities in which we operate. CSR programs of Vessel Warehousing Private Limited use responsible business practices and social investments to create long-term value.

Vessel Warehousing Private Limited shall not compromise safety in the pursuit of commercial advantage. The company shall strive to provide a safe, healthy and clean working environment for our employees and all those who work with the company.

COMMITMENT TO STAKEHOLDERS

A. Compliance with Law

Vessel Warehousing Private Limited are expected to conduct business as responsible corporate citizens and follow the applicable legal framework of the country in which the company operates in spirit and by letter of the law

All the employees are expected to know and understand the legal obligations that apply while executing our duties and responsibilities on the job. Ignorance cannot be an excuse for violation of law. Where any provision of the Code conflicts or is inconsistent with applicable law, the provisions of that law must be complied with, and would override this Code.

Vessel Warehousing Private Limited always ensure that it is conducting business with reputable customers, for legitimate business purposes, with legitimate funds in compliance with anti-money laundering principles.

Violations of applicable government laws, rules, and regulations may subject to individual criminal or civil liability. Such individual violations may also subject the Company to civil or criminal liability, or the loss of reputation or business, and both these events may attract disciplinary action by the Company.

B. Books, Records and Public Disclosures

Vessel Warehousing Private Limited ensures that the Company's accounting and financial records meet the highest standards of accuracy and completeness. The records must be managed securely throughout their life cycle in line with their importance to the Company and in compliance with legal, tax, regulatory, accounting, and business retention requirements.

If an employee has a reason to believe that any of the Company's books, records, or disclosures are inaccurate, irregular, or misleading, he/she should immediately report to the Reporting manager, Compliance Co-

Ordinator, citing the nature of such an issue.

Those authorized to make disclosures of the Company's information must ensure that information provided to the public is true, accurate, and complete. No disclosure should be misleading.

C. Insider Trading and Corporate Confidentiality

During employment with the Vessel Warehousing Private Limited, employee may become aware of material non-public information (also known as insider information). Information stops being non-public when it has been effectively disclosed to the public and a reasonable waiting period has passed to allow the information to be absorbed by the marketplace.

Buying or selling securities of any company either directly or indirectly while an employee possesses material non-public information (otherwise known as 'insider trading') is a criminal offence and is prohibited by the Company.

Any incident of insider trading should be reported to the Compliance Co-Ordinator as a good Governance practice or under the Prohibition of Insider Trading (PIT) Regulations, issued by SEBI and amended from time to time. Read the Insider Trading Policy for more details \

D. Assist in Audit and Investigation

During employment with Vessel Warehousing Private Limited, employee may be asked to participate in an audit or internal investigation conducted by the Company's external auditors or other audit agencies. Employee should cooperate fully and communicate honestly when participating in such efforts.

Employees may also receive a request for documents or a request to meet with regulators or lawyers in connection with a legal proceeding or government investigation. If employee receive such a request, he/she should immediately contact the Reporting Manager for information and guidance.

E. Fraud and Misconduct

Any fraudulent behaviour, misrepresentation or misconduct is liable to be investigated and the employee(s) concerned is liable to face appropriate disciplinary and/or legal action. Acts of commission or omission which are detrimental to the business of the Company i.e., bribery, fraud, pilferage, theft, unrecorded sales or purchase, partial recording of income, etc. are termed as misconduct.

All employees are responsible for reporting any incidents of fraud, falsification, and manipulation of data that come to their knowledge as described under Whistle Blower Policy

F. External Confirmation

If employees are contacted and requested to discuss Company business with any member of the press, investors, market analysts, or any other outside parties, he/she should refrain from doing so and instead, refer the request to the competent authority. For further guidance on such external communications refer Policy on Communication Standards.

Similarly, when using social media, the employees should not speak on behalf Vessel Warehousing Private Limited. Employees should always:

- State that the materials and opinions that are posted are personal views and not those of the Vessel Warehousing Private Limited
- Take adequate precaution to ensure that any confidential information about the Vessel Warehousing Private Limited is not disclosed
- Refrain from using any Vessel Warehousing Private Limited or third-party logos or trademarks without express permission of the Compliance Co-Ordinator

G. Insider Trading and Corporate Confidentiality

Vessel Warehousing Private Limited recognizes the rights of its investors to information, and it shall always be sensitive to this need. The relevant information will be speedily disseminated and shall be as informative as it is required to be, subject to considerations of confidentiality and applicable legislation.

Vessel Warehousing Private Limited shall inform financial stakeholders about relevant aspects of our business in a fair, accurate and timely manner and shall disclose such information in accordance with applicable law

and agreements.

Vessel Warehousing Private Limited shall keep accurate records of our activities and shall adhere to disclosure standards in accordance with applicable law and industry standards

BEHAVIOUR AT THE WORKPLACE

A. Equal employment opportunity while respecting Diversity and Human Rights

Vessel Warehousing Private Limited takes pride in saying that:

- Provide equal opportunity and inclusion for all employees through our employment practices and have fair, transparent and clear employee policies which promote diversity and equality, in accordance with applicable law and other provisions of this Code.
- Recognize that a mix of backgrounds, opinions, and talents enriches the organization and helps us achieve success.
- Celebrate the importance of diversity in our workplaces and hence strive to be as diverse as the customers the company serves.
- Recognize the importance of maintaining and promoting fundamental human rights in all our operations.
- Provide fair and equitable wages, benefits, and other conditions of employment.
- Respect employees' right to freedom of speech and provide safe and humane working conditions.
- Strictly prohibit forced labour and child labour.
- Respect the individual and create a culture of trust and respect that promotes a positive work environment.
- Never discriminate or treat employees or job applicants unfairly and are committed to provide equal opportunity in employment.
- No decisions should be made based on gender, race, colour, nationality, ancestry, religion, physical or mental disability, medical condition, sexual orientation, or marital status.

B. Conduct at Workplace

Vessel Warehousing Private Limited ensures that our behaviour with our fellow colleagues does not give an unprofessional impression about us at the workplace. Touching others inappropriately or in a way that can be regarded as vulgar should be avoided. Employees should always be humble, courteous, and behave in a decent and professional way. Employees are expected to be properly groomed and neatly dressed while at work, both when inside and outside the office premises.

Vessel Warehousing Private Limited does not encourage insinuations, half-truths, rumours, and gossip, all of which attack the self-respect of the individual and/or attempt to divide the employees into groups.

C. Freedom from Harassment

Vessel Warehousing Private Limited sets a standard of 'zero tolerance' for harassment. Employees are all responsible for ensuring that he/she should avoid actions or behaviour that are, or could be, viewed as harassment. The company views all incidents of 'sexual harassment' very seriously and encourages each employee to report any incident of sexual harassment to the Internal Complaints Committee.

Vessel Warehousing Private Limited may initiate strict disciplinary action against any employee found guilty of any kind of sexual harassment as detailed in the POSH policy. For any other incident of harassment, please inform the Compliance Co-Ordinator immediately

D. Ensuring Health and Safety

Vessel Warehousing Private Limited values everyone as an important asset of the organization and is committed to high standards of safety and protection. Each one of the Company's employees has the responsibility to follow the Company's safety and security procedures, as well as applicable laws and regulations always.

The employees should intervene and report immediately, if health and safety is compromised. Vessel Warehousing Private Limited owns and operates facilities with the necessary permits, approvals, and controls that are designed to protect health, safety, and the environment.

Vessel Warehousing Private Limited contractors and other third parties are expected to commit to the same level of health and safety protection.

E. Drugs and Alcohol

Employees are not permitted to use, possess, sell, transfer, manufacture, distribute, or be under the influence of illegal drugs or alcohol on Company workplace premises, while at work during working or nonworking hours. In addition, employees should not report to work while under the influence of, or impaired by, alcohol or illegal drugs or substances.

F. Adhering to anti-violence guidelines

With respect to the Vessel Warehousing Private Limited commitment to providing a safe work environment, never engages in or tolerate any form of violence or bullying irrespective of the designation of the employee involved. It fosters the kind of environment where people feel safe and are always treated with respect and professionalism.

Employees are prohibited from engaging in any act on premises that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats, or any expression of hostility, intimidation, aggression, or ragging. Employees are also prohibited from possessing weapons at our workplace

PROTECTION OF ASSETS AS WELL AS INFORMATION MANAGEMENT

A. Protection and Responsible use of Corporate Assets and Information Technology

Employees of Vessel Warehousing Private Limited are personally responsible for safeguarding, securing, and protecting the Company's assets and information technology from theft, destruction, misappropriation, wastage, and abuse. Vessel Warehousing Private Limited assets include property, proprietary information, corporate opportunities, Company funds, and Company equipment.

Company assets must be used only for business purposes and to advance our strategic objectives. The employees are allowed occasional personal use of Company assets and information technology, if it does not compromise Company's interests, adversely affect our job performance, or result in abuse of the Company's resources.

B. Protect Confidential Information of the Company, its employees, and its Business Associates

During the course of work, employees may have access to confidential information about the Company. 'Confidential Information' is generally non-public and/or personally identifiable information that employees may be aware of as a result of their position with the Company and that might be of use to competitors or harmful to the Company if disclosed.

Common examples include:

- Customer lists
- Financial or non-financial information known as a result of one's position with the Company
- Terms, discount rates, or fees offered to particular customers or suppliers
- Cost of construction and other related costs
- Marketing or strategic plans
- Master plans, layout plans, floor plans prior to release in public domain
- Trade secrets, including manufacturing and marketing processes and techniques
- Brand logos, campaigns, collaterals prior to release in public domain
- Software, risk models, tools, and other systems or technology developments
- Names, contact addresses, email addresses, government IDs, credit cards, bank account details, photos, videos, or any combination of that information belonging to customers, vendors, and/or employees

Employees may disclose confidential information only to:

- Fellow Company employees or third parties who have a legitimate clearance, on a 'need-to-know' basis
- Those who have a clear duty or obligation to keep the information confidential

- Those who have a legal obligation to disclose this information as required

C. Intellectual property and trademarks

The employees must respect the intellectual property (IP) belonging to third parties and may never knowingly infringe upon the IP rights of others. The employees should be cautious when preparing advertising or promotional materials, using the name or printed materials of any other Company. When using a licensed software, only a software which is adequately licensed by the publisher should be used on Company computers or to perform Company work.

ADMINISTERING OUR CODE AND REPORTING VIOLATIONS

A. Issuance and amendments to our code

The Vessel Warehousing Private Limited has a Compliance Co-Ordinator who will oversee the implementation of the Code, policies, and their compliance. It is also the responsibility of the Compliance Co-Ordinator to review the efficacy of these policies and suggest amendments to make them relevant to changing times. Systems and policies should be clear and transparent and shall be documented in manuals that serve as a valuable tool for learning and governance.

In case of any clarification, consultation, or any discussion required on any matters relating to the Code, employees are encouraged to approach the Compliance Co-Ordinator for the same.

B. Investigation of reported code violation

Vessel Warehousing Private Limited take all reports of potential violations seriously and is committed to confidentiality and a full investigation of all allegations by designated teams.

Employees are obliged to co-operate in internal investigations and failure to do so may result in disciplinary actions.

The Company strives to:

- Protect confidentiality of individuals involved, to the extent practical
- Inform the employee of accusations reported against him/her at a time when such a disclosure will not jeopardize the investigation, typically when the information is complete, and clarification need to be sought from employee
- Where permissible, allow employees to review and rectify the information reported

C. Obligations of Reporting Managers and others receiving reports of potential code violations

Reporting Managers and others who receive reports of potential Code violations play a very important role in upholding the Code. Vessel Warehousing Private Limited encourages employees to talk to the Reporting Managers about their concerns. Reporting Managers and members should:

- Make sure that they comprehend the Code, and ensure their behaviour is consistent with the Code
- Let team members know that they are available to discuss and support them in their concerns
- Act to stop violations of the Code or the law by any team member
- Raise all concerns to the appropriate level and function
- Never let team members feel that their concerns are being ignored
- Ensure that no retaliation occurs against someone for reporting a suspected violation of the Code

D. Reporting Violations

The Compliance Co-Ordinator will be responsible for ensuring that these principles are properly communicated and understood by all to whom these are addressed Vessel Warehousing Private Limited promotes open and honest communication. If employees become aware of a breach or potential breach of our Code or of other legal requirements, he/she must report, whether it relates to them, their manager, or anybody else.

Any violation of the Code should be reported either to the Reporting Managers, Compliance Co-Ordinator, HumanResource Department, any other reporting channel set out in our company's 'Whistle-blower' policy, or the Board of Directors as laid down in the Approval Matrix. Some examples of these issues include:

- Accounting or auditing irregularities or misrepresentations
- Fraud, theft, bribery, and other corrupt business practices
- Anti-trust or insider trading violations
- Significant environmental, safety, or product quality issues
- Illegal discrimination or harassment - Actual or potential conflicts of interest
- Guidance on any national, regional, tribal, state or municipal legal requirements that apply to theCompany or to our job

E. Disciplinary Action

To maintain the highest standards of integrity, employees must comply with the Code, Vessel Warehousing Private Limited policies, and procedures, as well as applicable laws and regulations. Individuals who fail to do so will be subject to disciplinary action.

The disciplinary action will be decided depending upon the facts of the case and may include penalties, suspension, or even termination of employment. In addition, if deemed necessary by the management, appropriate regulatory authorities will be informed and involved as required and criminal or civil legal action may be initiated.

F. Signature and Acknowledgement

All new employees must sign an acknowledgement form, confirming that they have read the Code and agree to abide by its provisions. Failure to read the Code or sign the acknowledgement form does not excuse an employee from compliance with the Code. All Employees should sign off the acknowledgement form annually.

G. Periodic reporting to the Compliance Co-Ordinator

All Reporting Managers and Human Resource Representatives who have granted approval to any employee on any matter mentioned in the Code have to report all such approvals granted to the Compliance Co-Ordinator on a quarterly basis.

H. Waivers

Waiver of any provision of this Code, for officers of Vessel Warehousing Private Limited, must be approved by the Board of Directors.

I. Non-Retaliation

Vessel Warehousing Private Limited does not tolerate any form of retaliation against any person who reports a suspected violation in good faith. In addition, no one who participates or cooperates honestly and completely in our Company's investigation will be subjected to retaliation for doing so. Anyone who retaliates against a person for making a good faith report or for participating in the investigation of a report, as described above, will be subject to disciplinary action.