

Vardhaman Capital Pvt.Ltd.

INTERNET ACCESS POLICY

Circular: - Ref. SEBI/HO/MIRSD/CIR/PB/2018/147 dated December 03, 2018

Policy created by	Designated Officer
Policy reviewed by	Technology Committee
Policy reviewed on	31-12-2024
Policy Approved by	Board of Directors
Policy approved on	04-01-2025

Version - 1.2

Objective

Our organisation recognizes that use of the Internet and e-mail is necessary in the workplace, and employees are encouraged to use the Internet and e-mail systems responsibly, as unacceptable use can place Company and others at risk. This policy outlines the guidelines for acceptable use of Company's technology systems. This policy helps ensure network security, protect sensitive information, and promote responsible and productive use of internet resources.

Scope

This policy must be followed in conjunction with other policies governing appropriate workplace conduct and behaviour. Any employee who abuses the company-provided access to e-mail, the Internet, or other electronic communications or networks, including social media, may be denied future access and, if appropriate, be subject to disciplinary action up to and including termination. Company complies with all applicable central, state and local laws as they concern the employer/employee relationship, and nothing contained herein should be misconstrued to violate any of the rights or responsibilities contained in such laws.

Questions regarding the appropriate use of Company's electronic communications equipment or systems, including e-mail and the Internet, should be directed to your supervisor or the information technology (IT) department.

Policy

Company has established the following guidelines for employee use of the company's technology and communications networks, including the Internet and e-mail, in an appropriate, ethical and professional manner.

Confidentiality and Monitoring

- All technology provided by Company, including computer systems, communication networks, company-related work records and other information stored electronically, is the property of the Company and not the employee. In general, use of the company's technology systems and electronic communications should be job-related and not for personal convenience. Company reserves the right to examine, monitor and regulate e-mail and other electronic communications, directories, files and all other content, including Internet use, transmitted by or stored in its technology systems, whether onsite or offsite.
- Internal and external e-mail, voice mail, text messages and other electronic communications are considered business records and may be subject to discovery in the event of litigation. Employees must be aware of this possibility when communicating electronically within and outside the company.

Appropriate Use

- Company employees are expected to use technology responsibly and productively as necessary for their jobs. Internet access and e-mail use is for job-related activities; however, minimal personal use is acceptable.
- Employees may not use Company's Internet, e-mail or other electronic communications to transmit, retrieve or store any communications or other content of a defamatory, discriminatory, harassing or pornographic nature. No

messages with derogatory or inflammatory remarks about an individual's race, age, disability, religion, national origin, physical attributes or sexual preference may be transmitted. Harassment of any kind is prohibited.

- Disparaging, abusive, profane or offensive language and any illegal activities—including piracy, cracking, extortion, blackmail, copyright infringement and unauthorized access to any computers on the Internet or e-mail—are forbidden.
- Copyrighted materials belonging to entities other than Company may not be transmitted by employees on the company's network without permission of the copyright holder.
- Employees may not use Company's computer systems in a way that disrupts its use by others. This includes sending or receiving excessive numbers of large files and spamming (sending unsolicited e-mail to thousands of users).
- Employees are prohibited from downloading software or other program files or online services from the Internet without prior approval from the IT department. All files or software should be passed through virus-protection programs prior to use. Failure to detect viruses could result in corruption or damage to files or unauthorized entry into company systems and networks.
- Every employee of Company is responsible for the content of all text, audio, video or image files that he or she places or sends over the company's Internet and e-mail systems. No e-mail or other electronic communications may be sent that hide the identity of the sender or represent the sender as someone else. Company's corporate identity is attached to all outgoing e-mail communications, which should reflect corporate values and appropriate workplace language and conduct.
- Every employee should emphasize the importance of maintaining strong and secure passwords for internet access and encourage regular password updates and provide guidelines for creating strong passwords.

Change in the Policy will be adopted as and when required by the company and is binding on all the Staff / Employees /and Directors of the Company.

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CISO :- Anup Kumar Khandelwal

Dated: - 04-01-2025