



“K”LINE (INDIA) PRIVATE LIMITED

Information Technology Policy

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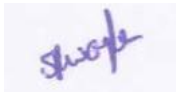

Version	Prepared by	Reviewed by	Approved by	Reviewed Date
1.1	Asgar S Bharuchwala	Shubhangi Wagle	Biswajeet Chakraborty	01 st April, 2016
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1.3	Asgar S Bharuchwala 	Shubhangi Wagle 	Rajeev Mittal 	01 st April, 2023



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1. Intent:

Increased protection of information and Information Technology Resources to assure the usability and availability of those resources to all users of "K" Line (India) Pvt. Ltd. ("K" Line) is the primary intent of this Policy. The Policy also addresses privacy and usage guidelines for those who access "K" Line's Information Technology Resources.

2. Purpose:

"K" Line recognizes the vital role information technology plays in effecting Company business as well as the importance of protecting information in all forms. As more information is being used and shared in digital format by "K" Line's IT resources authorized users, the need for an increased effort to protect the information and the technology resources that support it, is felt by "K" Line and hence this Policy.

Since a limited amount of personal use of these facilities is permitted by "K" Line to users, including computers, printers, e-mail and Internet access, therefore, it is essential that these facilities are used responsibly by users, as any abuse has the potential to disrupt company business and interfere with the work and/or rights of other users. It is therefore expected of all users to exercise responsible and ethical behavior while using "K" Line's Information Technology facilities.

3. Reference:

In this Policy, a reference to the following word(s) shall have the following meanings assigned to it.

3.1. Information Technology Resources:

Information Technology Resources for purposes of this Policy include, but are not limited to, "K" Line owned or those used under license or contract or those devices not owned by "K" Line but intentionally connected to "K" Line -owned Information Technology Resources such as computer hardware, printers, fax machines, voice-mail, software, e-mail and Internet and intranet access.

3.2. User:

Anyone who has access to "K" Line's Information Technology Resources, including but not limited to, all employees, temporary employees, probationers, contractors, vendors and suppliers.

3.3. Policy:

This Policy includes within its purview the following referred Policies

- The General Information Technology Usage Policy
- The Software Licensing Policy



- The Internet and Intranet Usage Policy
- The E-mail Usage Policy
- The Helpdesk Process
- The Business Continuity Planning and Disaster Recovery

4. Policy:

The use of the "K" Line's information technology resources in connection with "K" Line's business and limited personal use is a privilege but not a right, extended to various users. The privilege carries with it the responsibility of using the Users of "K" Line 's Information Technology resources efficiently and responsibly.

By accessing "K" Line's Information Technology Resources, the user agrees to comply with this Policy. Users also agree to comply with the applicable laws and all governing contracts and licenses and to refrain from engaging in any activity that would subject "K" Line to any liability. "K" Line reserves the right to amend these policies and practices at any time without prior notice.

Any action that may expose "K" Line to risks of unauthorized access to data, disclosure of information, legal liability, or other potential system failure is prohibited and may result in disciplinary action up to and including termination of employment and/or criminal prosecution.

5. Scope

This policy applies to **everyone who, in India, has access to "K" Line's Information Technology Resources and it shall be** the responsibility of all Branch Managers in the Branches and IT Head at the corporate office to ensure that this policy is clearly communicated, understood and followed by all users.

This Policy also applies to all contracted staff and vendors/suppliers providing services to "K" Line that bring them into contact with "K" Line's Information Technology resources. The HR / Admin department and the respective Branch Managers who contracts for these services shall be responsible to provide the contractor/vendor/supplier with a copy of this Policy before any access is given to them.

These policies cover the usage of all of the Company's Information Technology and communication resources, whether they are owned or leased by the company or are under the company's possession, custody, or control, including but not limited to:

- All computer-related equipment, including desktop personal computers (PCs), portable PCs, terminals, workstations, PDAs, wireless computing devices, telecomm equipment, networks, databases, printers, servers and shared computers, and all networks and hardware to which this equipment is connected.

- All electronic communications equipment, including telephones, pagers, radio communicators, voice-mail, e-mail, fax machines, PDAs, wired or wireless communications devices and services, Internet and intranet and other on-line services.
- All software including purchased or licensed business software applications, "K" Line -written applications, employee or vendor/supplier-written applications, computer operating systems, firmware, and any other software residing on "K" Line -owned equipment.
- All intellectual property and other data stored on "K" Line's Information Technology equipment.
- These policies also apply to all users, whether on Company property or otherwise, connected from remote connections via any networked connection, or using Company equipment.

6. General standards for acceptable use of "K" Line Information Technology resources require:

- Responsible behavior with respect to the electronic information environment at all times.
- Compliance with all applicable laws, regulations and "K" Line's policies
- Respect for the rights and property of others including intellectual property rights
- Behavior consistent with the privacy and integrity of electronic networks, electronic data and information and electronic infrastructure and systems.

7. General Information Technology Usage Policy

7.1. Passwords

- Individual password security is the responsibility of each user.
- Passwords are an essential component of "K" Line 's computer and network security systems. To ensure that these systems perform effectively, the users must choose passwords that are difficult to guess. This means that passwords must not be related to your job or personal life. This also means passwords should not be a single word found in the dictionary or some other part of speech.
- To make guessing more difficult, passwords should also be at least Seven characters long. To ensure that a compromised password is not misused on a long-term basis, users are encouraged to change passwords every 30 days. Password history would be maintained for previous three passwords. This applies to the Systems Logon (windows password) and Cloud Mail passwords.
- Passwords must not be stored in readable form in batch files, automatic log-in scripts, software macros, terminal function keys, in computers without access control systems, or in other locations where unauthorized persons might discover them. Passwords must not be written down and left in a place where unauthorized persons might discover them.



Immediately upon assignment of the initial password and in all cases of password "reset" situations, the password must be immediately changed by the user to ensure confidentiality of all information.

- Under no circumstances, Users shall use another user's account or password without proper authorization.
- Under no circumstances, the user must share his/her password(s) with other user(s), unless the said user has obtained from the concerned Branch Manager/IT Head the necessary approval in this regard. In cases where the password(s) is/are shared in accordance with the above, the user shall be responsible for changing the said password(s) immediately upon the completion of the task for which the password(s) was shared.
- In cases where no prior approval had been obtained for sharing of password(s) with other user(s), such user shall be completely responsible for all consequences that shall follow in respect of breach of this Policy and "K" Line shall initiate appropriate disciplinary proceedings against the said user.

7.2. Access Control

- All "K" Line computers that are either permanently or temporarily connected to the internal computer networks must have a password-based access control system. Regardless of the network connections, all computers handling confidential information must also employ appropriate password-based access control systems.
- All in-bound connections to "K" Line computers from external networks must be protected with an approved password or ID access control system. Modems may only be used at "K" Line after receiving the written approval of the IT Head and must be turned off when not in use.
- All access control systems must utilize user-IDs, passwords and privilege restrictions unique to each user. Users are prohibited from logging into any "K" Line system anonymously. To prevent unauthorized access all vendor-supplied default passwords must be changed before "K" Line's use.
- Access to the server room is restricted with RFID lock and only recognized IT staff or someone with due authorization from IT Head is permitted to enter the room.
- Users shall not make copies of system configuration files (e.g. Passwords, etc) for their own, unauthorized personal use or to provide to other users for unauthorized uses.

7.3. Managing System Privileges

- Requests for new user-IDs and changes in privileges must be made to the IT Department in Mail. Users must clearly state why the changes in privileges are necessary.
- In response to feedback from the Human Resources Department, the IT department will revoke any privileges no longer needed by users. After receiving information from HR / Admin department all system access privileges will be terminated within 24 hours when a user leaves "K" Line.
- "K" Line management reserves the right to revoke the system privileges of any user at any time. Conduct that interferes with the normal and proper operation of "K" Line information systems, which adversely affects the ability of others to use these information systems, or which is harmful or offensive to others will not be permitted.

7.4. Changes to Systems

- No user must physically connect or disconnect any equipment, including "K" Line owned computers and printers, to or from any "K" Line network.
- With the exception of emergency situations, all changes to "K" Line information technology systems and networks must be documented, and approved in advance by the IT Head.
- Only persons who have been authorized by the IT Head can make emergency changes to any "K" Line computer system or network.

7.5. Security (Access Control)

- Users are forbidden from circumventing security measures.
- Users are **strictly prohibited** from establishing dial-up connections, using modems or other such apparatus, from within any "K" Line's premises.
- Users who have been given mobile/portable laptop / palmtop or any other device and duly authorized for such remote access, which connects to "K" Line's mail system on a real-time basis, can do so through the Internet.
- Unless the prior approval of the IT Head has been obtained, users shall not establish Internet or other external network connections that could allow non-authorized users to gain access to "K" Line systems and information. These connections include the establishment of multi-computer file systems, Internet web pages & FTP servers.
- Users must not test or attempt to compromise computer or communication system security measures unless specifically approved in advance and in writing by the IT Head. Incidents involving unapproved system cracking (hacking), password cracking (guessing), file decryption, software copying, computer configuration changing or similar unauthorized

attempts to compromise security measures will be considered serious violations of "K" Line policy. Likewise, short-cuts bypassing system security measures is absolutely prohibited.

7.6. Change Management Policy (eBMS Application)

- User can't send any request for CR on their own, they have to discuss the same to their department head and the assigned user by the department head / super user in turn will prepare the CR with proper screen & report formats required.
- CR will be sent with all the details to IT Department.
- IT department will review the same with proper documentation of the screens and reports to be modified and if any addition required to any forms or reports will be added.
- Assigned user / Super user will also upload the same CR in eBMS application Score Card module for Audit purpose.
- Proper approval from the management will be taken by the IT department on the mail.
- IT Department will maintain Hard Copy of the CR raised for future reference.
- Proper CR format will be sent to eBMS by the IT department only, No CR will be accepted from any super user or department head by eBMS.
- Any CR would be installed on UAT first.
- Testing on UAT Server will be done by the specific user assigned by the department head, after the testing is successful, the assigned user will send a mail to IT department for successful testing done and changes can be implemented on production server.
- IT department will send a mail to eBMS team to install the changes in production server.
- After the mail is received by eBMS team, eBMS team will install the same on production server.
- The changed files would be saved in a separate folder with release note and version number (Folder Name should be the CR Name with Date of Installation) on production server by eBMS team for future reference.
- Proper Versions of the software would also be maintained by eBMS team.
- After every CR is installed on the production, version number of the software would also change and what are the changes done in that version would also be displayed in the about us screen of eBMS software, so a proper record can be maintained for the changes done.

7.7. Incident / Problem Management Policy (eBMS Application)

- eBMS related incidents / Problems will be reported to eBMS only through eBMS Score Card System and all the reported incidents / problems would be reviewed once in a year and in case of change in operational procedures, the same would be reviewed by the management.

7.8. User Access Management (eBMS Application)

- eBMS Access Rights form would be given to HOD's of appropriate departments by Admin for selecting the appropriate rights for the new user and a scanned copy of the same would be sent to Kline IT along with the joining form on mail by the Admin after taking all necessary signatures.
- Modification request form would be filled up by the HOD's in case of modification asked to be given to existing users and a scanned copy of the same would be sent to Kline IT on mail by the Admin after taking all necessary signatures.
- User / Particular Access Deactivation request would be sent on mail by the respective HOD's / Admin department to the IT department.

8. Software Licensing Policy

- For all software including purchased or licensed business software applications, "K" Line - written applications, employee or vendor/supplier-written applications, computer operating systems, firmware, and any other software residing on "K" Line -owned equipment, all users must comply with the software licensing policy and must not use/install/download any software for their individual use or even for business purpose without prior approval of the IT Head at corporate office. In case any such software is found on any "K" Line system which is not allocated to the individual user, it shall be the responsibility of the user to inform the same to the IT department, in cases the same is not installed by the said user otherwise "K" Line shall initiate appropriate disciplinary proceedings against the said user.
- All necessary software's are pre-installed on all "K" Line systems for day-to-day office needs. Request for any additional needs to be addressed to the IT Head for approval.
- Use of "K" Line network resources to illegally distribute or duplicate unauthorized copyrighted or licensed material is prohibited. Users shall not make unauthorized copies of copyrighted software, except as permitted by law or by the owner of the copyright.

9. Internet and Intranet Usage Policy

- Internet software may only be installed / used by or with the approval of the IT Head. Software patches or updates may only be downloaded, subject to approval and ensuring strict adherence to the vendor's security and usage guidelines.



- Access to the internet and its resources is provided for the purposes of conducting business on behalf of "K" Line. Reasonable personal use of the Internet is permitted, according to constraints and conditions set out by the Sonicwall Firewall.
- The IT department reserves the right to block access to any Internet resource without any prior notice, in case anyone required access to restricted site, the same may be dealt as special case provided the same is identified as use strictly for official purpose and conducting "K" Line business. The approval for the same needs to be obtained by the Department Head / Branch Manager from the IT Head.
- Similarly, to protect "K" Line's IT systems from imported viruses, downloading or exchanging screensavers, games, entertainment software or other inappropriate files (for example, video or audio materials for personal use), playing games against opponents or gambling over the internet is not permitted.
- Furthermore, users may not conduct any form of "hacking" or use malicious code to penetrate or attempt to penetrate other computers or to deliberately release viruses or other harmful programs within either the "K" Line network or the internet or bypass security features.

10. Email Usage Policy

- All authorized users of "K" Line are provided with an E-mail account, which is either individual to the specific user or generic Email ID and the same is protected with a password which is provided to the individual user. The use of E-mail should be restricted only for the business purpose; however personal mail can also be exchanged to a limited quantum provided that such exchange does not amount to breach of this IT policy or otherwise materially affects "K" Line's operations. In case any individual is found using e-mail service, which is objectionable by any means, the access can be terminated by IT department without any prior information, however the same may be re-instated with the approval from the Managing Director and IT Head at the corporate office.
- Email users should be aware that exchange of information with external sites may not be secured with high risks of spam, Trojans, malicious codes etc. Hence exchange of information should be limited to reliable sites. Users are prohibited to use their names/e-mail ids/mail domain in public domain without prior authorization from IT Head.
- Information must not be transmitted internally or externally which is beyond the bounds of generally accepted standards, values and ethics. This includes, for example, material which could be considered offensive or discriminatory; pornographic or obscene, defamatory or any other material which is otherwise abusive or contains illegal content prohibited by law or regulation of the country or which brings the organization into disrepute. Information is understood to include text, images and is understood to include printing information and sending information via email.



- All material contained on the email system belongs to the "K" Line and users should consider messages produced/received by them on "K" Line account to be secure. The confidentiality of email data should be maintained by the individual user.
- Security regarding access to the email system is of paramount importance. User identities and personal passwords must not be shared with others. Users should be cautious of providing their email addresses to external parties, especially mailing lists.
- Users transferring or receiving files or attachments from external sources should note that the "K" Line system automatically checks downloaded material for viruses. However, in the event that a virus is suspected, the file or attachment must not be opened and the matter must be reported to the IT Department immediately for inspection and action.
- "K" Line email users are required to use this communication tool in a responsible fashion and to observe the related guidelines. "K" Line provides the email system for the purposes of conducting official business and it may not be used for personal gain or business activities unrelated to "K" Line's operations. Users must not use the system to promote an external cause without prior permission from the IT Head.
- Reasonable personal use of the email system is permitted. Personal use of the e-mail service must not interfere with "K" Line's operations, involve cost implications for "K" Line or take precedence over the user's job accountabilities.
- Where it is considered that there has been a breach in the use of the email system, the service of the user will be terminated without any prior information.

11. Helpdesk Process

All locations within India where "K" Line operates whether by itself or through its sub-agencies all help and support pertaining to the system/user/network/back-end shall be provided by the local IT executives (applicable only for Mumbai, Delhi & NSA) or where the local IT Executives are not available, by the central IT helpdesk. In case any user finds any problem with the IT systems or need any help, they can send in their request to IT Executives at corporate office via e-mail to mum.systems@in.kline.com. In the event of emergencies IT Executive can be contacted via telephone at +91-22- 24993882 or +91-98213 12356 / +91-98701 61151, however all phone calls must be followed by an e-mail later.

12. Data Backup

In order to prevent loss of information by destruction of the magnetic means in which it is stored, a periodic backup procedure is carried out. The responsibility for backing up the information located in shared access servers is the network administrators. It must be borne in mind that not only are hard disks inclined to fail, but also magnetic tapes are quite prone to errors that destroy their contents, so we need to do the restoration testing time to time basis.

- **General Rule:** As Full Back up on First Monday of every 1 month is carried out following daily incremental backup is happening for all critical business applications (i.e. Monday to Friday – set of 10 tapes for 12 weeks) and a complete weekly Full backup are carried out including file servers / old data kept on servers (i.e. on all Saturdays – set of 2 tapes), 11 tape for monthly backup and 1 tape for yearly backup total using 24 LTO 6 tapes and Magnetic tape library for whole month. Maintaining the Full Backup and Incremental magnetic tapes of the last 30 days backups and after that all daily backup tapes are into recycling mode after 30 days where as for monthly magnetic tapes are maintained for 365 days and after that all the monthly tapes are into recycling mode after 365 days and for yearly backup the magnetic tapes are maintained for 1825 days. We are keeping separately month end backup tape, as month end full back up on each last working day of every month, all the Software encrypted tapes are kept outside "K" Line's premises with the Managing Director of the company, in order to prevent data loss.
- **Data Backup in File Servers:** The Systems Management backs up all the information in the file servers through an automated procedure.
- **Data Backup in Database Servers:** The Systems Management backs up all the information in the databases through an automated procedure.
- **Data Backup in Desktop PC and Notebook:** This task is the responsibility of the user to whom the computer has been assigned.