Chromewell Engineering Private Limited

Policy on Careful Communication

POLICY NO: CW-ENV-001 | VERSION: 4.0

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1. Document Information:

Document Details		Governance
Policy Owner: HR HOD / Compliance Executive	**Scope:** All internal and external communications across Chromewell Engineering Pvt Ltd including verbal, written, digital, customer, supplier, media, marketing, compliance, ESG, financial, and operational communications across all offices, manufacturing locations, warehouses, and business functions.	**Reviewed & Approved By:** CEO & CFO
Secondary Owner: Corporate Communication / Compliance Team	**Applies To:** All employees, officers, directors, contractors, consultants, spokespersons, vendors, suppliers, and third parties acting on behalf of Chromewell Engineering Pvt Ltd.	**Review Cycle:** Annual – Once a year

2. Purpose

Chromewell Engineering Pvt Ltd is committed to maintaining professional, accurate, respectful, ethical, and responsible communication across all business operations and stakeholder interactions. This Careful Communication Policy establishes the principles and expectations for all internal and external communications to ensure that information shared on behalf of Chromewell is clear, lawful, consistent, confidential, and aligned with the organisation's values, Code of Conduct, and business objectives.

The purpose of this policy is to promote transparent and responsible communication practices while preventing misleading statements, inappropriate disclosures, reputational risks, discriminatory language, misinformation, confidentiality breaches, and unauthorised communication with customers, suppliers, regulators, media, or other stakeholders.

Chromewell recognises that effective communication plays a critical role in maintaining stakeholder trust, protecting the company's reputation, ensuring regulatory compliance, supporting collaboration, and fostering a respectful workplace culture. All employees and representatives are therefore expected to exercise sound professional judgment, confidentiality, and accountability in every form of communication, including verbal, written, digital, social media, customer-facing, and public communications.

This policy is aligned with Chromewell's Code of Conduct and Ethics, applicable legal and regulatory requirements, confidentiality obligations, information security practices, and corporate governance standards.

3. Scope

This policy applies to:

- All Chromewell Engineering Pvt Ltd manufacturing units, warehouses, offices, logistics operations, and business functions across all owned, leased, and operated locations.
- All forms of communication including verbal, written, electronic, digital, social media, presentations, reports, emails, customer communications, supplier communications, marketing materials, compliance disclosures, ESG communications, and public statements made on behalf of Chromewell.
- All employees, officers, directors, consultants, contractors, temporary workers, spokespersons, agents, and third parties acting on behalf of Chromewell Engineering Pvt Ltd.
- All internal communications between employees, departments, management teams, and business functions.
- All external communications with customers, suppliers, regulators, auditors, investors, media representatives, government authorities, business partners, and members of the public.
- All confidential, proprietary, operational, financial, commercial, customer-related, supplier-related, compliance-related, ESG-related, and strategic information communicated, shared, stored, or disclosed through any communication channel.

4. Standards of Communication

When you send out a written communication, make sure you:

✓ Know and verify your audience. Check the recipients of the communication - review email addresses carefully and be mindful of using the "Reply to All" feature. Understand the role of each recipient of the message. Keep internal messages within Chromewell.

✓ Be professional in all your communications. Ensure that the content and tone of the message are appropriate. Provide the context for your statements and consider the reaction if your communication were disclosed in a newspaper or on the Internet

✓ Exercise extreme caution with respect to competitor communications. For more specific information regarding this topic, please refer to Chromewell's Policy on Antitrust & Competition.

✓ Respect privacy, confidentiality and privilege. A privileged communication is one between you and an in-house or external lawyer in connection with certain legal matters.

5. Helpful Tips to Be Cautious Of

✓ Any communication that includes competitively sensitive information or that may be interpreted as an attempt to collude or collaborate on pricing, share or allocate markets or otherwise violate Chromewell's Policy on Antitrust & Competition.

✓ Providing opinions outside your area of knowledge or expertise - do not speculate or assume. Clearly state items/issues of which you have first-hand knowledge. Involve others to address areas outside your area of knowledge or expertise.

✓ Legal issues – be mindful of "issue spotting" and understand the law as it relates to your position or area of responsibility. If you are uncertain about a legal issue that you are addressing or that is raised by others, involve legal Counsel, as appropriate, and mark your communication "attorney-client privileged" where appropriate.

✓ Communications made via social media, employees and other persons who act on Chromewell's behalf are expected to refrain from disparaging Chromewell or disclosing any confidential information - this duty extends to social media. Communications made via social media should not be considered private, regardless of the user's settings.

NEVER…

x Overpromise – be factual.

x Send messages when upset; rather, save a draft of the message for a period of time and then review it before sending. Consider obtaining a second opinion

x Discuss other stakeholders in a negative manner - be professional.

x Send or forward any communications that are discriminatory or harassing in nature. If you receive such a communication, seek assistance from your Supervisor or Manager, Human Resources Department, or Legal Counsel.

6. Policy Commitments

6.1 Professional Communication

- Chromewell promotes respectful, professional, and ethical communication across all business interactions.
- Offensive, discriminatory, misleading, or inappropriate communication is prohibited.

6.2 Accuracy and Compliance

- All communications must be accurate, transparent, and compliant with applicable laws and company policies.
- Misrepresentation, concealment, or sharing false information is strictly prohibited.

6.3 Confidentiality

- Confidential and sensitive information must be protected and shared only with authorised persons.
- Employees must follow company confidentiality and information security requirements.

6.4 Digital and External Communication

- Emails, digital platforms, and social media must be used responsibly and professionally.
- Only authorised personnel may communicate publicly or with media on behalf of Chromewell.

6.5 Reporting Concerns

- Employees are encouraged to report communication-related concerns or violations through designated reporting channels.
- Chromewell prohibits retaliation against individuals reporting concerns in good faith.

7. Company Records and Privacy

Remember that almost any form of communication pertaining to Chromewell or your work may be considered a company record (regardless of whether it is in paper, electronic, audio or other format). Company records are critical

to Chromewell's business - they may be subject to review internally and externally (including by internal and external auditors, government agencies or investigators and attorneys reviewing evidence in lawsuits and other legal proceedings).

Assume that there are no "off-the-record" conversations or communications and that anything which is deleted can be recovered. By communicating carefully, you help to protect not only Chromewell's reputation but your own as well.

8. Policy Review Mechanism

This policy is reviewed annually by the HR HOD / Compliance Executive and Corporate Communication Team, with approval from the CEO & CFO. Interim reviews may be initiated due to communication-related incidents, confidentiality breaches, regulatory changes, or audit findings. Any updates to the policy shall be communicated to all relevant employees and stakeholders. The review ensures alignment with Chromewell's Code of Conduct, confidentiality requirements, and professional communication standards.

Version	Date	Author	Approved By	Summary of Changes
1.0	July 01, 2021	Compliance Executive/HR HOD	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Initial issue
2.0	May 03, 2022	Compliance Executive/HR HOD	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Minor edits on the Quantitative targets
3.0	June 05, 2025	Compliance Executive/HR HOD	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Updated to v3.0: KPI has been revised
4.0	Jan 14,2026	Compliance Executive/HR HOD	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Added related policies with clear accountability and ownership

11. Formal Approval and Sign-Off

This policy has been prepared, reviewed, and formally approved:

Prepared By	Reviewed By	Approved By
Name: Ms. Meghna Hazra **Designation:** Compliance Executive **Date:** Jan 2026 **Signature:** _____	**Name:** Mr. Sandeep Divekar **Designation:** HR HOD **Date:** Jan 2026 **Signature:** _____	**Name:** Ms. Risha Naik **Designation:** CFO **Date:** Jan 2026 **Signature:** _____

FOR FURTHER INFORMATION:

This policy is issued under the authority of the CEO & CFO of Chromewell Engineering Pvt Ltd. It supersedes v3.0 (June 2025). For further information or advice, please contact a Chromewell Finance or Compliance Officer or Chromewell's Board or Directors.