



Advertising Ethics Policy

CORPORATE OFFICE:

Vakrangee Corporate House

Plot No. 93, Road No. 16, M.I.D.C., Marol, Andheri (East), Mumbai – 400093, Maharashtra

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1. Introduction

Vakrangee is a unique technology driven company focused on building India's largest network of last-mile retail outlets to deliver real-time BFSI, ATM, e-commerce and logistics services to the unserved rural, semi-urban and urban markets. The Assisted Digital Convenience stores are called as "Vakrangee Kendra" which acts as the "One-stop shop" for availing various services and products.

Our Company has a network of convenience stores throughout the country providing access to Multiple lines of products and services through various tie-ups with well reputed service partners. At each of our NextGen Vakrangee Kendra outlets, we have a 32-inch Digital signage, Physical Poster frames and Digital ATM screen which can be leveraged for Marketing and Advertising. We do recognize that there can be significant financial benefits to these partnerships and as such, advertising initiatives.

This Policy is meant to guide the organization to ensure all recognition-related or advertising initiatives involving Vakrangee are properly approved and consistent with Vakrangee values and public image.

Advertising and other forms of marketing communications are vital means of communicating between marketers and customers. They help to create efficient markets, both nationally and internationally, promote economic development, and bring significant benefits for both consumers and companies, as well as for society in general.

2. Scope

For the purposes of this policy, the term "advertising" encompasses any materials used to advertise or promote an organization, product, service or event, including advertisements in publications, public spaces or within Vakrangee Kendras either on Digital signage, Physical posters or else ATM screens, also Vakrangee Web sites, or through posters, signs, banners, notices, handbills, flyers, leaflets, e-mails, brochures, samples, giveaways or other promotional devices within the Vakrangee Ecosystem.

This policy applies to all physical, electronic and "virtual" space or facilities, including the organization intranet and Internet presence.

3. Responsible Advertising and Marketing Communications

Advertising and other forms of marketing communications are vital means of communicating between marketers and customers. They help to create efficient markets, both nationally and internationally, promote economic development, and bring significant benefits for both consumers and companies, as well as for society in general.

The use of properly implemented advertising and marketing communications codes is acknowledged and accepted in all major markets as industry best practice and a recognized means of providing additional consumer protection. Self-regulation is a tried and tested system which has served responsible business well, for the benefit of consumers all over the world.

This policy is intended to achieve the following objectives:

- To demonstrate responsibility and good practice in advertising and marketing communications
- To enhance overall public confidence in marketing communications
- To respect privacy and consumer preferences
- To ensure special responsibility as regards marketing communications and children and teens
- To safeguard the freedom of expression of those engaged in marketing communications (as embodied in article 19 of the United Nations International Covenant of Civil and Political Rights)

4. General Provisions guiding our Advertising and Marketing Communication Ethics

We draw reference from International Chambers of Commerce for the general provisions as a guideline for our Advertising and Marketing Communication.

4.1 Article 1 — Basic Principles

All marketing communications should be legal, decent, honest and truthful.

All marketing communications should be prepared with a due sense of social and professional responsibility and should conform to the principles of fair competition, as generally accepted in business.

No communication should be such as to impair public confidence in marketing.

4.2 Article 2 — Social Responsibility

Marketing communications should respect human dignity and should not incite or condone any form of discrimination, including that based upon ethnic or national origin, religion, gender, age, disability or sexual orientation.

Marketing communications should not play on fear or exploit misfortune or suffering.

Marketing communications should not appear to condone or incite violent, unlawful or anti-social behaviour.

Marketing communications should not play on superstition.

4.3 Article 3 — Decency

Marketing communications should not contain statements or audio or visual treatments which offend standards of decency currently prevailing in the country and culture concerned.

4.4 Article 4 — Honesty

Marketing communications should be so framed as not to abuse the trust of consumers or exploit their lack of experience or knowledge.

Relevant factors likely to affect consumers' decisions should be communicated in such a way and at such a time that consumers can take them into account.

4.5 Article 5 — Truthfulness And Non-Deceptive Ads

Vakrangee commits that its Marketing communications should be truthful, non-deceptive and not misleading.

Marketing communications should not contain any statement, claim or audio or visual treatment which, directly or by implication, omission, ambiguity or exaggeration, is likely to mislead the consumer, in particular, but not exclusively, with regard to:

- Characteristics of the product which are material, i.e. likely to influence the consumer's choice, such as: nature, composition, method and date of manufacture, range of use, efficiency and performance, quantity, commercial or geographical origin or environmental impact
- The value of the product and the total price to be paid by the consumer

- Terms for the delivery, provision, exchange, return, repair and maintenance
- Terms of guarantee
- Copyright and industrial property rights such as patents, trade-marks, designs and models and trade names
- compliance with standards
- Official recognition or approval, awards such as medals, prizes and diplomas
- The extent of benefits for charitable causes

4.6 Article 6 — Substantiation

Descriptions, claims or illustrations relating to verifiable facts in marketing communications should be capable of substantiation. Claims that state or imply that a particular level or type of substantiation exists must have at least the level of substantiation advertised. Substantiation should be available so that evidence can be produced without delay and upon request to the self-regulatory organizations responsible for the implementation of the Policy.

4.7 Article 7 — Identification and Transparency

Marketing communications should be clearly distinguishable as such, whatever their form and whatever the medium used. When an advertisement, including so-called “native advertising”, appears in a medium containing news or editorial matter, it should be so presented that it is readily recognizable as an advertisement and where appropriate, labelled as such.

The true commercial purpose of marketing communications should be transparent and not misrepresent their true commercial purpose. Hence, a communication promoting the sale of a product should not be disguised as, for example, market research, consumer surveys, user-generated content, private blogs, private postings on social media or independent reviews.

4.8 Article 8 — Identity of Marketer

The identity of the marketer should be transparent. Marketing communications should, where appropriate, include contact information to enable the consumer to get in touch with the marketer without difficulty.

The above does not apply to communications with the sole purpose of attracting attention to communication activities to follow (e.g. so-called “teaser advertisements”).

4.9 Article 9 — Use of Technical/Scientific Data and Terminology

Marketing communications should not:

- Misuse technical data, e.g. research results or quotations from technical and scientific publications
- Present statistics in such a way as to exaggerate the validity of a product claim
- Use scientific terminology or vocabulary in such a way as falsely to suggest that a product claim has scientific validity

4.10 Article 10 — Use of “Free” and “Guarantee”

The term “free”, e.g. “free gift” or “free offer”, should be used only:

- Where the offer involves no obligation whatsoever, or
- Where the only obligation is to pay the delivery costs which should not exceed the cost estimated to be incurred by the marketer, or
- In conjunction with the purchase of another product, provided the price of that product has not been increased to cover all or part of the cost of the offer

Where free trial, free subscription and similar offers convert to paid transactions at the end of the free period, the terms and conditions of the paid conversion should be clearly, prominently and unambiguously disclosed before the consumer accepts the offer. Likewise, where a product is to be returned by the consumer at the end of the free period it should be made clear at the outset who will bear the cost for that. The procedure for returning the product should be as simple as possible, and any time limit should be clearly disclosed.

Marketing communications should not state or imply that a “guarantee”, “warranty” or other expression having substantially the same meaning, offers the consumer rights additional to those provided by law when it does not. The terms of any guarantee or warranty, including the name and address of the guarantor, should be easily available to the consumer and limitations on consumer rights or remedies, where permitted by law, should be clear and conspicuous.

4.11 Article 11 — Comparisons

Marketing communications containing comparisons should be so designed that the comparison is not likely to mislead and should comply with the principles of fair competition. Points of comparison should be based on facts which can be substantiated and should not be unfairly selected.

4.12 Article 12 — Denigration

Marketing communications should not denigrate any person or group of persons, firm, organisation, industrial or commercial activity, profession or product, or seek to bring it or them into public contempt or ridicule.

4.13 Article 13 — Testimonials

Marketing communications should not contain or refer to any testimonial, endorsement or supportive documentation unless it is genuine, verifiable and relevant. Testimonials or endorsements which have become obsolete or misleading through passage of time should not be used. The sponsored nature of an endorsement or testimonial should be made clear through an appropriate disclosure if the form and format of the communication would not otherwise be understood to constitute a sponsored message.

4.14 Article 14 — Portrayal or Imitation of Persons and References to Personal Property

Marketing communications should not portray or refer to any persons, whether in a private or a public capacity, unless prior permission has been obtained; nor should marketing communications without prior permission depict or refer to any person's property in a way likely to convey the impression of a personal endorsement of the product or organisation involved.

4.15 Article 15 — Exploitation of Goodwill

Marketing communications should not make unjustifiable use of the name, initials, logo and/or trademarks of another firm, company or institution. Marketing communications should not in any way take undue advantage of another firm's, individual's or institution's goodwill in its name, brands or other intellectual property, or take advantage of the goodwill earned by other marketing campaigns without prior consent.

4.16 Article 16 — Imitation

Marketing communications should not imitate those of another marketer in any way likely to mislead or confuse the consumer, for example through the general layout, text, slogan, visual treatment, music or sound effects.

Where a marketer has established a distinctive marketing communications campaign in one or more countries, other marketers should not imitate that campaign in other countries where the marketer who originated the campaign may operate, thereby preventing the extension of the campaign to those countries within a reasonable period of time.

4.17 Article 17 — Safety and Health

Marketing communications should not, without justification on educational or social grounds, contain any visual portrayal or any description of potentially dangerous practices, or situations which show a disregard for safety or health, as defined by local national standards. Instructions for use should include appropriate safety warnings and, where necessary, disclaimers. Children should be shown to be under adult supervision whenever a product or an activity involves a safety risk.

Information provided with the product should include proper directions for use and full instructions covering health and safety aspects whenever necessary. Such health and safety warnings should be made clear by the use of pictures, sound, text or a combination of these.

4.18 Article 18 — Data Protection and Privacy

When collecting personal data from individuals, care should be taken to respect and protect their privacy by complying with relevant rules and regulations.

4.18.1 Collection of data and notice

When personal data is collected from consumers, it is essential to ensure that the individuals concerned are aware of the purpose of the collection and of any intention to transfer the data to a third party for that third party's marketing purposes. Third parties do not include agents or others who provide technical or operational support to the marketer and who do not use or disclose personal data for any other purpose. It is best to inform the

individual at the time of collection; when it is not possible to do so this should be done as soon as possible thereafter

4.18.2 Use of data

Personal data should be:

- Collected for specified and legitimate purposes and used only for the purposes specified or other uses compatible with those purposes
- Adequate, relevant and not excessive in relation to the purpose for which they are collected and/or further processed
- Accurate and kept up to date
- Preserved for no longer than is required for the purpose for which the data were collected or further processed

4.18.3 Security of processing

Adequate security measures should be in place, having regard to the sensitivity of the data, in order to prevent unauthorised access to, or disclosure of, the personal data.

If the data is transferred to third parties, it should be established that they employ at least an equivalent level of security measures.

4.18.4 Privacy policy

Those who collect personal data in connection with marketing communication activities should have a privacy policy, the terms of which should be readily available to consumers, and should provide a clear statement of any collection or processing of data that is taking place, whether it is self-evident or not.

4.18.5 Rights of the consumer

Appropriate measures should be taken to ensure that consumers understand their rights to, e.g.:

- Opt out of direct marketing lists
- Opt out of interest-based advertising

- Sign on to general direct preference services
- Require that their personal data not be made available to third parties for their marketing purposes
- Rectify incorrect personal data which are held about them

Where a consumer has clearly expressed a wish not to receive marketing communications using a specific medium, this wish should be respected. Appropriate measures should be put in place to help consumers understand that access to content may be made conditional on the use of data.

4.19 Article 19 — Transparency on Cost of Communication

Where the cost to consumers of accessing a message or communicating with the marketer is higher than the standard cost of that mode of communications, e.g. “premium rate” for an online message, connection or telephone number, this cost should be made clear to consumers, expressed either as “cost per minute,” “cost per message,” “message or data rates may apply,” or other similar means likely to be understood by the consumer. When this information is provided on-line, consumers should be clearly informed of applicable charges at the time when they are about to access the message or online service and be allowed a reasonable period of time to disconnect without incurring the charge.

Where a communication involves such a cost, the consumer should not be kept waiting for an unreasonably long time in order to achieve the purpose of the communication and calls should not be charged until the consumer can begin to fulfill that purpose.

4.20 Article 20 — Unsolicited Products and Undisclosed Costs

Marketing communications associated with the practice of sending unsolicited products to consumers who are then asked for payment (inertia selling), including statements or suggestions that recipients are required to accept and pay for such products, should not be used.

Marketing communications which solicit a response constituting an order for which payment will be required (e.g. an entry in a publication) should make this unambiguously clear.

Marketing communications soliciting orders should not be presented in a form which might be mistaken for an invoice, or otherwise falsely suggest that payment is due.

4.21 Article 21 — Environmental Behaviour

Marketing communications should not appear to condone or encourage actions which contravene the law, self-regulatory codes or generally accepted standards of environmentally responsible behaviour.

4.22 Article 22 — Responsibility

These general rules on responsibility are technology neutral and apply to all forms of marketing communications. Rules on responsibility with special relevance to certain activities or media can be found in the chapters devoted to those activities and media.

Marketers have overall responsibility for the marketing communications of their products.

The responsibility to observe the Policy also applies to other participants in the marketing eco-system, including market influencers, bloggers, vloggers, affiliate networks, data analytics and ad tech companies as well as those responsible for preparing algorithms and the use of artificial intelligence for marketing communications purposes.

Agencies or other practitioners should exercise due care and diligence in the preparation of marketing communications and should operate in such a way as to enable marketers to fulfill their responsibilities.

Publishers, media owners, contractors or other parties, who publish, transmit, deliver or distribute marketing communications, should exercise due care in the acceptance of them and their presentation to the public.

Individuals employed by any firm, company or institution falling into any of the above categories and who take part in the planning, creation, publication or transmission of a marketing communication are responsible, to an extent commensurate with their respective activities, for ensuring that the rules of the Policy are observed and should act accordingly.

Whatever the nature of the activity, medium or technology, responsibility is shared by all parties concerned, commensurate with their respective role in the process and within the limits of their respective functions.

The Policy applies to the marketing communication in its entire content and form, including testimonials and statements, and audio or visual material originating from other sources. The fact that the content or form of a marketing communication may originate wholly or in part from other sources does not justify non-observance of the Policy rules.

4.23 Article 23 — Effect of Subsequent Redress for Contravention

Subsequent correction and/or appropriate redress for a contravention of the Policy, by the party responsible, is desirable but does not excuse the contravention.

4.24 Article 24 — Implementation

The Policy and the principles enshrined in it should be adopted and implemented, nationally and internationally, by the Company.

Communications practitioners or advertising agencies, publishers, media-owners, contractors and other participants in the marketing eco-system, such as market influencers, bloggers, vloggers, affiliate networks, data analytics and ad tech companies as well as those responsible for preparing algorithms for marketing communications should be familiar with the Policy and with other relevant local self-regulatory guidelines on advertising and other marketing communications, and should familiarise themselves with decisions taken by the appropriate self-regulatory body. They should ensure an appropriate means exists for consumers to make a complaint and that consumers can readily be aware of it and use it easily.

4.25 Article 25 — Respect for Self-Regulatory Decisions

No marketer, communications practitioner or advertising agency, publisher, media owner or contractor should be party to the publication or distribution of an advertisement or other marketing communication which has been found unacceptable by the relevant self-regulatory body.

4.26 Article 26 — Conflict of Interest due to Ownership Structure

Vakrangee commits to not create conflict of interests arising due to ownership structure. We shall place advertisements in independent agencies not relating to the Company. We will also not place advertisements in our platforms from the related entities.

5. Principles

1. All initiatives involving advertising, promotional/recognition signage or other commercially oriented materials or displays will taken into consideration.
2. All initiatives involving advertising, promotional/recognition signage or other commercially oriented materials or displays will be evaluated by the Advertising Ethics and Standards committee.
3. We ensure that ads are adequately substantiated and comply with all applicable laws, regulations, and guidelines of the country. While the content of advertising does not reflect our views — if it comes to our attention that an ad, in our opinion, contains demonstrably false or unlawful content, we will refuse or remove the ad in whole or in part.
4. We may exercise discretion to refuse or remove any advertising that is inconsistent with or may tend to bring disparagement, harm to reputation, or other damage to the organization.

6. Advertising not permitted in our Ecosystem

1. We do not advertise illegal products or services, including drugs, illegal substances, or any related products or services.
2. We strictly prohibit advertising of any products related to following categories:
 - a. Alcohol
 - b. Tobacco
 - c. Gambling
 - d. Prostitution and sexual massage services
 - e. Political or Controversial Matters
 - f. Weapons related

3. We do not indulge in advertising of hateful or violent text advocating against any individual, group, or organization.
4. We do not indulge in advertising determined to be inflammatory.
5. We do not indulge in any personal attack against an individual, country, or organization.
6. We do not indulge in advertising which undermines the intellectual integrity, authority, and character of our mission and brand.

7. Advertising Ethics and Standards Committee

The Committee is responsible for approving/resolving issues related to advertisement inventory before it is implemented in the systems.

The Advertising Ethics and Standards Committee member as follows:

- Vedant Nandwana - Managing Director
- Aditya Jani – Head Corporate Affairs
- Prabodh Bhusari – Head Legal, Compliance, Quality Assurance & Risk Management

8. Community feedback

We welcome feedback from members of our community on any advertising or advertising issue.

All correspondence regarding the advertising or recognition-related initiative should be directed to the Advertising Ethics and Standards Committee.

Contact details:

Name	Designation	Contact Information
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Thank You

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