

# YKK INDIA Code of Conduct

FUNCTION: HUMAN RESOURCE MANAGEMENT	POLICY: CODE OF CONDUCT	
PREPARED BY: GA & HR	APPROVED BY: MANAGEMENT	
DATE: 13 <sup>th</sup> January, 2020	VERSION NO: HR/ CC/ 01/03	

Policy Number	HR/ CC/ 01
Policy Distribution	All employees
Confidentiality	Confidential to YKK India employees only
Effective Date	13th January 2020
First Amendment	w.e.f. 01 <sup>st</sup> October 2022
Applicability	All permanent employees and workers of the Company
Policy content	I. Compliance
	The YKK India pledges to take whatever steps are necessary to fully comply with all applicable laws, regulations, and all company policies and procedures based on "Do the right things, Do things right".
	You must maintain the highest standards of integrity, and professionalism in your work for the YKK Group. Any adverse behaviour may result in reputational risk or damage to YKK India and the YKK Group.
	1. Compliance with Laws and Regulations You must take whatever steps are necessary to fully comply with all laws and regulations that apply to conducting business activities. In the event that you are unsure as to whether any laws or regulations apply to your conduct, you must consult with the human resources department or your manager or the Legal and Compliance officer/ Department before proceeding with any business activities.
	2. Compliance with Internal Rules and Policies  You must fully comply with related internal company rules, regulations, and policies when conducting business activities. In the event that you are unsure as to whether any internal company rules, regulations, or policies apply to your conduct, you must consult with the human resources department or your manager or the Legal and Compliance officer/ Department to obtain a correct understanding.
	What Is Expected of Everyone  1) Understand the Code.  2) Comply with the Code and the applicable law and internal rules and policies.
	When to Seek Guidance When you are unsure of the right things to do, ask yourself the questions listed below to help guide your decision —
	Is action consistent with "Do the right things, do things right" from the three point of view i.e. Customer, Society and YKK?

- Is the action consistent with YKK core values?
- Will my decision compromise any of YKK's commitments to employees, customers, business partners, and the society we serve?
- Is the action fair?
- Is the action legal?
- Is the action in line with YKK policies?

### Working together to stop misconduct

You should immediately report illegal or unethical conduct to the human resources department, your manager, or the Legal and Compliance officer/ Department or via the whistleblowing hotline.

When you raise a genuine concern, it helps YKK identify area that requires improvement, remedy specific problems, and improve YKK level of ethical awareness.

### I. What is Expected of Managers

## 1. Promote a Culture of Ethics and Compliance

Managers should at all times comply with the Code and set a good example to everyone. As a manager, you should:

- Ensure that the people you supervise understand the Code and YKK policies.
- Take opportunities to discuss the Code and reinforce the importance of ethics and compliance with employees.
- Create an environment where employees feel comfortable raising concerns.
- Never encourage or direct employees to achieve business results at the expense of ethical conduct or compliance with the Code or the law.

#### 2. Respond to Questions and Concerns

- If approached with a question or concern related to the Code, listen carefully and give the employee your complete attention.
- Ask for clarification and additional information. Seek help if you need it.
- If an employee raises a concern that may require investigation under the Code, contact the Legal and Compliance officer/ Department.

#### 3. No subcontracts to Prisoners

 Ensure that YKK India shall not subcontract any of its process or work to the prisoners or to vendors who get the product from prisoners

# II. Company Property including Confidential Information

You must, in an ethical and efficient manner, utilize and protect YKK India and YKK Group assets, including confidential information because you recognize that they are valuable to our business activities.

Confidential information is information, including proprietary information that you create, develop or use during your employment (including sales and technological

data) which is not generally known to the public about YKK India and/or YKK Group, its customers, business partners or employees.

Unauthorized access, use or distribution of confidential information is strictly prohibited and your obligations continue even after you have left employment with YKK India. Similarly, you must not bring with you any kind of proprietary confidential information which you have obtained from a previous employer.

You must comply with any applicable YKK India and/or YKK Group policies or local law relating to confidential information. In particular, you must follow the following guidelines:

- Only access confidential information that you need and are authorized to view
- Do not display or discuss confidential information in public places.
- Only communicate confidential information, to other YKK India and/or YKK Group employees and authorized agents (e.g. legal counsel or external auditors) who have a legitimate business reason to know the confidential information and who have no duties or responsibilities which could lead to a conflict of interest.

You agree to use your best efforts to prevent loss and unauthorized use towards YKK India's and/or YKK Group's assets.

You must comply with all applicable information security policies and you should only use YKK India and/or YKK Group assets, including telephone, computer networks, email and remote access capabilities for YKK India business.

### i) Protection and Proper Use of Company Assets

All employees and officers of YKK India should protect the company's assets and ensure all the company's assets are used for legitimate company purposes. Any suspected incident of fraud or theft should be immediately reported for investigation.

### Do not -

- Use company's assets for your personal benefit or the benefit of anyone other than the company.
- Do not engage in personal activities during work hours that prevent you from fulfilling your job responsibilities
- Do not use company computers and equipment for non-business purpose.
- ii) The company's confidential information is a valuable asset. All confidential information must be used for company business purposes only. Every director, officer, employee, agent and contractor must safeguard it. Our responsibility in this regard includes not disclosing the company confidential information without authorization from the company.

Do not -

- Disclose confidential information to anyone outside the company, including to family and friends, except when disclosure is required for business purposes. Even then, you must contact the Legal and Compliance officer/ Department to ensure appropriate steps are taken, such as execution of a confidentiality agreement, to prevent misuse of information.
- Disclose confidential information to others inside the company unless they have a business reason to know, and communications have been classified according to the Information Protection Policy.
- Disregard the Information Protection Policy put in place by the company, such as the Confidential Management System (CMS), Information Security Management System (ISMS).
- Act without advice of the Legal and Compliance Officer/ Department when responding to any request from anyone, including but not limited to governmental regulatory authorities, for the company's confidential information.

# III. Privacy and Employee Confidentiality

YKK India pledges to comply with its data protection obligations. Access to personal data is strictly limited to authorized employees who have a business reason for processing the data. Those with access to personal data must only use it for the purpose for which it was collected and must adhere to high standards of confidentiality. Personal data must be accurate and, where necessary, kept up to date.

You give your consent to YKK India and/or YKK Group for processing your personal data whether obtained directly from you or from another source where it relates to employment matters for a number of purposes (e.g. payroll). Personal data will be handled in accordance with applicable laws and regulations and internal policies and procedures applicable in India and will be held by YKK India for as long as it is necessary.

You acknowledge that your personal data may be processed on the YKK Group's behalf in other countries. If your personal data are transferred or held overseas, the YKK Group will ensure your rights as an individual are protected.

Personal data held on YKK India and/or YKK Group property, such as computers or handheld devices, are not private. However, YKK India and the YKK Group is committed to respecting and protecting privacy but in certain situations, such as a reasonable suspicion of misconduct, we may be left with no alternative but to monitor personal forms of communication.

# i) Information that may be sensitive or confidential if mishandled

- Personal files of the employees, containing all the private & confidential information.
- Employment records maintained by human resources department.

# ii) Guidelines for safeguarding the confidential information:

The general guidelines that apply to the handling of data, regardless of its form (electronic, oral or written):

- All human resource data and personal data regarding employees, should be marked as "Highly Confidential, Confidential, Internal use only" as per the guidelines given in the CMS (Confidential Management System).
- The information regarding personal information of the employees can be revealed to specific individuals within the organization only on a strict "need to know basis" and should not be provided to any other individual outside the organization.
- Employees who handle personal data of the others should act in accordance with the applicable law and any relevant contractual obligations;
- Employees who handle personal data of the others should collect, use and process such information only for legitimate business purposes;
- Employees who handle personal data of the others should limit access to the information to those who have a legitimate business purpose for seeing the information; and
- Employees who handle personal data of the others should exercise due care to prevent unauthorised disclosure.

### IV. Harmony with the Environment

The YKK Group has issued the "YKK Group Environmental Pledge." Striving to be an earth friendly company, the YKK Group pledges that it will address and promote 'harmony with the environment' as the highest priority of our business activities.

You acknowledge the significance of environmental activities and the high priority in which they are regarded within our business activities.

You must take whatever steps are necessary to comply with applicable environmental laws and regulations, as well as with all internal company rules, and policies.

You must immediately report to your immediate supervisor or Legal and compliance officer / Department, any potential violation of applicable laws, regulations, or internal company rules and policies that you become aware of in the workplace.

#### YKK India's Environnemental Protection Activités

YKK India is committed to comply with all the environment laws and regulations. We seek to protect the environment, conserve energy and natural resources and prevent pollution.

Our operations are subject to number of regulatory requirements relating to use, storage, discharge and disposal of hazardous chemicals used during our

manufacturing process. We monitor our compliance with these laws to maintain our status as a responsible corporate citizen. In addition we review our practices and procedures regularly to address changing circumstances, and to continually improve our performance.

The company expects its employees and officers to follow all applicable Environmental Laws and Regulations and internal policy. YKK India will do its business activity promoting harmony with the environment and society by doing the following:-

- By implementing ISO 14001- Standards and Guidelines.
- By effective utilization and/ or conservation of resources.
- By promotion of continual environmental improvement through pollution prevention strategy.
- By strengthening the compliance structure to observe relevant environmental laws and regulation, such as:
  - i) Environment Protection Act 1986 and Rules;
  - ii) Water and Air (Prevention and Control of Pollution) Act & Rules
  - iii) Noise Pollution (Regulation and Control) Rules 2000
  - iv) Bio-medical Waste (management and handling) Rules 1998
  - v) Ozone Depletion Substances (Regulation and Control) Rules 2009
  - vi) Hazardous Waste (Management, handling & Trans Boundary Movement) Rules 2009
  - vii) Manufacturing Storage & Import of Hazardous Chemicals Rules 2000
  - viii) Petroleum Rules & Gas Cylinder Rules 2004

### We / you are expected to -

- Consider how our behaviour in all aspects of our work impacts on the
  environment, so that we can reduce that impact wherever possible: for
  example, by cutting out unnecessary travel, saving water and energy and
  avoiding generating waste. Where waste is unavoidable, we must ensure
  materials are recycled or disposed of in a responsible fashion. Even small
  gestures, such as separating food waste in company eating areas, can make a
  difference
- Take all necessary actions to prevent and stop violations of YKK India environmental policy
- Report immediately any concerns related to environmental issues to management

# V. Safety and Health

The YKK Group has issued a "Declaration of Safety and Health". The YKK Group pledges that it will make the utmost effort to remove any obstacles in the workplace, which are harmful or dangerous, and to maintain and increase the physical and mental wellbeing of all employees. The YKK Group pledges to use our best efforts to accomplish these goals.

You must take whatever steps are necessary to comply with all applicable laws, regulations and internal company rules and policies related to safety and health.

You must stop any work that becomes unsafe and only undertake tasks for which you are trained.

You must immediately report to your immediate supervisor or the Legal and compliance officer / Department, any kind of potential harm, danger or defect you become aware of in the workplace. You must never assume that someone else will report such a risk or concern.

### YKK India – Safety and Health Compliances:

YKK India is committed to conduct its business in a responsible manner and strive to provide a safe and healthy working environment for our employees.

- We integrate health and safety into our business strategies to ensure a zero risk workplace.
- We comply with applicable health and safety laws and regulations.
- We strive to achieve continuous improvement in our health and safety programs.

#### Hazard prevention issues

In order to reduce any possible risks to health and safety at workplace, YKK India recognizes that it is important to carry out the following:

- Identification of hazardous area,
- labeling
- proper treatment of hazardous chemicals,
- periodic testing of equipment,
- testing of safety devises,
- implementing emergency preparedness plan, and
- Renewal of statutory licenses from the appropriate Government authorities.

### We / you are all expected to:

- Comply with the company's rules on health and safety at work;
- Take every reasonable precaution to maintain a safe and healthy working environment
- Ensure we are not putting ourselves or others at risk by our actions;
- Ensure that we know what to do if an emergency occurs at our workplace;
- Report to supervisor / Legal and Compliance Officer / Department any behaviour, installations or items likely to compromise the safety of our working environment, as well as all accidents, however minor.

### VI. Quality and Safety of Products

The YKK Group has issued an "YKK Group Quality Charter." The YKK Group highly values the trust that our customers have placed in our business, and pledges to continue providing products and services with the highest commitment to quality.

You must take whatever steps are necessary to comply with all applicable laws, regulations and internal company rules and policies related to product safety.

You must immediately report to your immediate supervisor or to the Legal and Compliance Officer / Department, any potential danger or defect which could affect the safety of our products.

# YKK India- Quality and Safety of Products

YKK India is committed to perform and adhere to highest quality standards and safety of the product for keeping the trust of our customer and YKK brand value.

To maintain the company's valuable reputation, compliance with our quality processes and safety requirements is essential. All inspection and testing documents must be handled in accordance with all applicable specifications and requirements, such as the Quality Management System (QMS) implemented by YKK.

All of us involved in the development, manufacturing, marketing, distribution and sales of our products are expected to:

- Comply with all legislative and regulatory requirements on product development and labelling
- Encourage a free and open exchange of views on product safety so that no safety issue is ignored
- Ensure that the highest standards and strict quality controls are applied at each stage of the production process
- Ensure all adverse reactions by consumers are reported to the Marketing and Sales / Research and Development Department.
- Strictly follow quality and process standard implemented.
- Respond promptly to any concerns about possible product safety, tolerance and quality control issues

# VII. Human Rights

The YKK Group respects the human rights, individuality and the personality of all individuals in all our operations, in every country and region in which our operations reside.

You must respect the human rights of all individuals, and you must take whatever steps are necessary to eliminate any sort of violence, or other forms of intimidation in the workplace.

YKK India has policy to treat every individual or group of visitors with full respect, dignity and hospitality.

### Protection of Human Rights in India

YKK India recognizes its responsibility of treating all individuals and human beings equal in dignity, respect and rights. The protection of human rights and fundamental freedom of citizens is guaranteed under the Constitution of India.

We must honour the Constitution of India which provides every Indian citizen

- Justice, social, economic, and political,
- Liberty of thought, expression, Freedom of Association, belief, faith and worship.
- Equality of status and opportunity and assuring the dignity of individual.

Fundamental Rights guaranteed under the Constitution, also confers right to equality before law, and ensure no discrimination on the grounds of religion, race, caste, sex, place of birth.

We are supposed to act in certain ways or to refrain from certain acts, in order to promote and protect human rights whether they are civil and political rights, such as the right to life, equality before the law and freedom of expression; economic, social and cultural rights, such as the rights to work, social security and education, or collective rights, such as the rights to development and self-determination.

#### Related Legislations and Laws in India

We / you are bound to comply with the "Protection of Human Rights Act 1993" which provide for the National Human Rights Commission for better protection of Human Rights.

There are additional labour law legislations that govern the fundamental issues related to human rights e.g.

- i) Abolition of Bonded Labour;
- ii) Prohibition of Child Labour;
- iii) Equal Remuneration law;
- iv) Minimum Wages law, etc.

We / You are expected to -

- Comply with all legislative and regulatory requirements
- Refrain from interfering with or curtailing the enjoyment of human rights of the others
- Respect rights of the others
- Respond promptly to any concerns about possible violation of personal rights, mistreatment and human rights issues

#### VIII. Relationship with Business Partners

The YKK Group will take whatever steps necessary to ensure that we conduct business transactions in a fair and equitable manner.

You must take whatever steps necessary to fully comply with all applicable anti-trust and fair competition laws and internal anti-trust/competition law guidelines established separately which apply to all our business activities, in order to continue to maintain fair and equitable dealings in the marketplace.

You must not undertake any personal activity that conflicts with the interests of the YKK India or its customers. You are responsible for identifying and managing actual conflicts or the appearance of any conflicts and for bringing these to the attention of your supervisor.

You are prohibited from giving or accepting gifts, entertainment, travel, payments and other considerations of value unless they are in accordance with the rules and policies established in YKK India.

You must not, directly or indirectly, offer, promise, give, or demand a bribe or other undue advantage to obtain or retain business or other improper advantage. In particular, you should:

- 1. Not offer, nor give in to demands, to pay the employees of business partners any portion of a contract payment. You should not use subcontracts, purchase orders or consulting agreements as means of channelling payments to the employees of business partners, or to their relatives or business associates.
- 2. Ensure that remuneration of agents is appropriate and for legitimate services only.

### Anti-trust & Competition

It is the company's policy to lawfully compete in the marketplace. This commitment includes respecting the rights of our competitors and abiding by all applicable laws in the course of competing. The company expects its competitors to respect our rights to compete lawfully in the marketplace, and we must respect their rights equally. No employee or officer is permitted to engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal anti-competitive activities.

For example, engaging in, conspiring to, or agreeing to do any of the following actions are prohibited:

- Agreeing or consulting with competitor(s) regarding prices, terms or conditions of sale, output, or production (Price Fixing).
- Agreeing with competitor(s) not to deal with vendors or distributors, other competitors, or customers (Group Boycott).
- Agreeing with competitor(s) to split territories or customers (Territory or Customer Allocation).

• "Agreeing" includes stated or implied, formal or informal, oral or written understandings, whether created directly with another party or indirectly through a third party.

#### Conflict of Interest

Employees are required to disclose or avoid any activity or interest that may be regarded as a possible conflict with YKK India's interest. For example:-

- Using YKK India's time and/or resources and/or influence to promote personal interests or the interests of third parties.
- Holding a second job with, or consulting for a competitor, vendor, or supplier with whom the company conducts business.
- Conducting company business with related parties or dealing with businesses in which you or related parties have significant interest.

#### Gifts and Entertainment

Gifts and entertainment can help build relationships, but they must never influence decisions, nor should they be considered part of "doing business". Employees must always refrain from paying or receiving a bribe intended to influence business operations or government conduct. No gift or entertainment should ever be offered, given, provided or accepted by any employee or officer, family member of an employee or officer, or agent unless it:

- is not a cash gift,
- is consistent with customary business practices;
- cannot be construed as a bribe or payoff; and
- Does not violate any laws or YKK India's policies.
- For further details employees can refer YKK India's policy / manual on Anti-Corruption and Bribery

#### IX. Relationship with Government Agencies

The YKK India will take whatever steps are necessary to undertake legally appropriate conduct and continue to develop fair and good faith relationships with all relevant government agencies.

You must take whatever steps necessary to develop and maintain fair relationships with government agencies.

You are prohibited from giving or accepting gifts, entertainment, travel, payments and other considerations of value to an employee of any governmental agency unless they are in accordance with the rules and policies established in YKK India. For gifts, entertainment, travel, payments and other considerations of value that you would like to give to or accept from anyone associated with a government or government entity, express written approval must be obtained from your HOD / Legal and compliance officer / Department prior to doing so.

You must not, directly or indirectly, offer, promise, give, or demand a bribe or other undue advantage to obtain or retain business or other improper advantage. In particular, you should:

- 1. Not offer, nor give in to demands, to pay public officials any portion of a contract payment. You should not use subcontracts, purchase orders or consulting agreements as means of channelling payments to public officials, or to their relatives or business associates.
- 2. Ensure that remuneration of agents is appropriate and for legitimate services only.
- Not make illegal contributions to candidates for public office or to political parties
  or to other political organizations. Contributions should fully comply with the
  rules and policies established in YKK India and express written approval must be
  obtained.

# YKK India - Government Relations

The global nature of our business often requires that we interact with officials of various governments around the world. Transactions with governments are covered by special legal rules and are not the same as conducting business with private parties. Consult the Legal and Compliance officer/ Department to be certain that you are aware of, understand and abide by these rules.

# Anti-bribery

Many countries, including India, have passed legislation criminalizing bribery of government officials. The sanctions for violating these laws can be severe, including significant individual and corporate fines, and even imprisonment.

A bribe is giving or offering to give anything of value to a government official to influence a discretionary decision. Examples of bribes include payment to a government official to encourage a decision to award or continue business relations, to influence the outcome of a government audit or inspection, or to influence tax or other legislation. Other payments to government officials also may constitute bribes in some jurisdictions. Consult the Legal and Compliance officer/ Department regarding anti-bribery laws in India.

#### **Political Activities**

YKK India does not prohibit personal participation in the political process provided the activities are conducted in a manner consistent with all relevant laws and company guidelines.

#### We / You are expected -

- that our job will not be affected by our personal political views or our choice in political contributions.
- not to use the company's reputation or assets, including your time at work, to further our own political activities or interests.

### Government Policies, regulations and requirements

It is the policy of YKK India to comply fully with all the applicable laws and regulations governing contact and dealings with Government employees and public officials, and to adhere to high ethical, moral and legal standards of business conduct. This policy includes strict compliances with all Central, State, Local and all applicable laws, rules and regulations.

# i) Requests by Regulatory Authorities.

The company and its directors, officers, employees, agents and contractors must cooperate with appropriate government inquiries and investigations. All government requests for information, documents or investigative interviews must be referred to the company's Legal and Compliance officer/Department.

# ii) Government Policies, Guidelines & Conditions

It is the company's policy to comply fully with all applicable laws and regulations that apply to government its policies, guidelines and terms and conditions of various licenses, approvals and consents etc. It is also necessary to strictly adhere to all terms and conditions of any contract with central, local, state government. The company's Legal and Compliance officer/ Department must review and approve all contracts with any government entity.

#### X. Workplace Dignity and Respect

The YKK India/Group's diverse workforce is one of our greatest strengths. Bringing together and supporting employees from different backgrounds, perspectives and cultures helps create a dynamic business that reflects the range of customers we serve.

Therefore the YKK India/Group is committed to providing equal opportunities for all its employees and job applicants who will receive fair treatment regardless of age, race, religion or belief, colour, nationality, ethnic or national origin, sex, sexual orientation, gender reassignment, marital status or disability. It is our aim that all relationships in the workplace are free from discrimination, bias and harassment.

You must ensure that you do not, by your own actions, behaviour or attitude, directly or indirectly discriminate against job applicants or fellow employees. In some countries employees can be held personally liable for acts of discrimination they commit.

### Workplace dignity and respect: It's Everyone's responsibility

YKK India is committed to providing a fair working environment where all employees are treated with dignity and respect. Company will not tolerate any form of bullying and harassment and it will take all practicable steps to avoid and eliminate this. Any form of bullying and/or harassment will be regarded as gross misconduct and may

result in disciplinary action including dismissal. Every individual visitor or group of visitors in YKK India shall be treated with full respect, dignity, and hospitality

The policy is based on the following key principles:

- The responsibility to ensure that all employees are treated equally and fairly in the workplace
- The right of employees to be treated with dignity and respect and to work without fear of harassment on any grounds.
- The responsibility of all employees to prevent any acts that may constitute harassment from being undertaken either by themselves or by others.

We aim to encourage our employees to build cultures in which respect for individuals is regarded as an essential part of the conduct of all those who work in our organization and employees are valued and where there is no unethical behaviour

All employees are responsible for their own professional and personal behaviour and are required to conduct themselves in a manner that does not cause offence to another person. Employees have a responsibility to treat others with dignity and respect and to ensure that other staff, employees and officers are not subjected to harassment in any form. They have a duty to report any harassment that they may have observed or that they are aware is taking place.

All staff should provide support to any colleague who believes that he/she is being harassed and cooperate fully as required with any internal investigation that takes place.

We / You are all expected to:

- Ensure we do not discriminate on the basis of:
  - Gender
  - Disability
  - Family situation
  - Sexual orientation
  - Age
  - Political and philosophical opinions
  - Religious beliefs
  - Union activity
  - Racial, social, cultural or national origins

This applies not only to recruitment, but also to all decisions relating to training, promotion, continued employment and working conditions in general.

- Not harass or bully anyone
- Be courteous: treat our fellow workers the way we would like them to treat us
- Not sexually harass anyone
- Immediately stop any behaviour which we have been told is unwanted
- •

ng Concerns and Reporting Misconduct
have genuine concerns regarding conduct- whether by another employee, a sor, customer, consultant, agent, supplier, other third party or yourself - that late the law, regulations or company policy, you will report the activity, at the practicable stage, by contacting any of the following:
our immediate supervisor he human resources representative he Legal and Compliance officer/ Department HA Whistle Blowing System
ting your suspicions, in good faith, you are ensuring that the YKK Group is not to any unnecessary risks and that the YKK Group's image is not tarnished.
sometimes be easier to ignore potential misconduct. However, your ment to the integrity of the YKK Group means that any legal or ethical issues ver be ignored. Malpractice within the YKK Group is taken very seriously and not be victimized or subjected to any detriment if you raise concerns in good
nistle Blowing System" is introduced with the objective to prevent illegal acts and conducted during the process of carrying out business activities, which are soon the YKK spirit and corporate principles as well as to construct a stronger acces system. This system should also be used for any employee who wants to enuine concern regarding the compliance of the Code of Conduct.
larification regarding any aspect of the policy, kindly contact the HR
reserves its rights to alter, add, or delete, replace any provisions of this Code ct at any time, at its sole discretion without notifying anyone in advance. Any ents shall be effective from the date stated below. Concerned persons should web page periodically to know the latest Code of Conduct.
Approved by
October 2022 Managing Director
vision of the vi