

EXTRACTS FROM THE HUMAN RESOURCE MANUAL OF THE COMPANY ON ETHICS, BRIBERY AND CORRUPTION

These shall be applicable to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries and group companies or their employees, wherever located

- Adhere to highest standards of honest and ethical conduct, including proper and ethical procedures in dealing with actual or apparent conflicts of interest between personal and professional relationships. The company does not tolerate any proven instance of bribery and corruption.
- To take a zero-tolerance approach to bribery and corruption and be committed to acting professionally, fairly and with integrity in all the relationships and business dealings wherever operate and to implement and enforce effective systems to counter bribery.
- shall engage in and promote honest and ethical conduct of business, including the ethical handling of actual and / or apparent conflicts of interest between personal and professional relationships.
- shall ensure and take all reasonable measures to protect the confidentiality of non-public information about the company, its business, customers and other materially significant information obtained or created in connection with any activities with the company and to prevent unauthorised disclosure of such information unless required by applicable laws or regulations or legal or regulatory process.

VL strongly believes the highest standard of self-integrity and moral value as a pre-requisite for sustainable growth in future. Therefore, employees are requested to adhere to the following rules to uphold highest standard of Business Ethics. **No employee is supposed to take any cash, gift or favours from any vendor or stakeholder.**

- No gift in whatsoever form, within/outside the premises of VL shall be accepted by the employees from suppliers/vendors of VL or any third party.
- The Company has a strict non tolerance against "money for job". The Company or any representative of the Company is not authorized to take any money from a candidate. If any person is found doing so, he/she would be terminated from the services of Company with immediate effect.
- There is no involvement of any third consultancy/vendors for providing manpower for VL.
- The Company discourages the employees to meet the vendors/suppliers outside the premises of the Company.

VL strongly believes in adopting anti-corruption and anti-bribery tactics by devising real time transaction system in the business undertaken/to be undertaken by it.