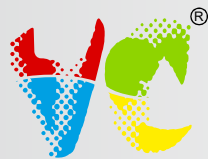




# CODE OF CONDUCT

## FOR BUSINESS PARTNERS



**VIJAY COPOLYMERS**  
INDIA

HI-SPEED VIRGIN GRADE PP STRAPPINGS



*Since 1990*

## FOREWORD OF THE OWNER OF VIJAY COPOLYMERS

VIJAY COPOLYMERS's business is founded on its core competencies of Manufacturing & supplying of Virgin Grade PP Strapping Rolls and strong partner integration, all infused by VIJAY COPOLYMERS's fundamental company values. It is this combination not only of skills, but also ethical principles that enables VIJAY COPOLYMERS to sustain successful, long-term relationships with business partners based on trust and reliability.

VIJAY COPOLYMERS's management is dedicated to promoting a culture of compliance at the company. The corn stone of the compliance system is Company's Code of Conduct. The implementation of which is carefully guided and over viewed periodically. VIJAY COPOLYMERS requires ethically and legally correct behaviour from its employees and encourages fair and respectful collaboration both within the company and between VIJAY COPOLYMERS and its partners.

I believe our dedication to our corporate values will drive growth & prosperity not only for VIJAY COPOLYMERS, but also for our customers, partners & suppliers.

MR. VIJAY CHHALLANI  
(PRESIDENT)

## WHAT VIJAY COPOLYMERS EXPECTS OF ITS BUSINESS PARTNERS

VIJAY COPOLYMERS and its associated companies recognise their business partners as important contributors to its worldwide success. Our goal is to develop relationships with business partners who share our corporate values of precision, high quality, accountability, teamwork and trust and who conduct business in an ethical

manner in compliance with relevant laws. We expect our business partners to observe the principles laid down in this code of conduct and reserve the right to follow-up potential issues in the event of doubt or to discontinue the business relationships.



## BUSINESS ETHICS

We expect from our business partners to respect and protect international proclaimed human rights and to refrain from child or forced labour.

Employees shall be treated fairly and equally with dignity and respect.



### ESSENTIAL ACTIONS

- Prevention of all kinds of discrimination.
- Prevention of child labour.
- Enable the right of freedom of association and collective bargaining.
- Providing a safe and healthy work place.
- Observing health and safety requirements at the working place.
- No excess of national regulated maximum working hours.

## ENVIRONMENTAL PROTECTION

We seek to continuously reduce the environmental impact arising from its activities. Our business partners are encouraged to share and actively support this objective. Our environmental management system complies with ISO 14001 and therefore encourages its business partners to consider environmental aspects.



### ESSENTIAL ACTIONS

- Act in line with applicable national and international statutory standards and laws concerning environmental protection.
- Consider an environmental management system.

## HEALTH AND SAFETY OF EMPLOYEES



In order to protect the health and well-being of its employees, we have organised our management system to meet the requirements of IMS (Integrated Management System) ISO - 9001, ISO- 14001, ISO 45001.

Business partners are encouraged to develop and implement equally effective quality, safety, health protection policies, trainings and management systems. For us, compliance with applicable national and international statutory standards and laws is substantial.

### ESSENTIAL ACTIONS

- Ensure health and safety trainings on a regular basis.
- Provide an occupational health and safety management.
- Control hazards and take precautionary measures against accidents and diseases.
- Ensure security aspects in countries with an increased risk potential.

## CORRUPTION

VIJAY COPOLYMERS conducts its business with integrity and will not accept its partners to condone or actively participate in corruption. Business partners are expected to ensure the same with regard to their employees, subcontractors, representatives and other involved parties. Directly or indirectly offering, granting, promising of benefits (e.g. gifts, money, hospitalities and invitations), which are not appropriate and likely to influence decisions illegitimately or to gain an improper advantage, are not acceptable. VIJAY COPOLYMERS expects its business partners to have own procedures in place regulating the dealing with benefits.

PLEASE UNDERSTAND THAT IF AN EMPLOYEE REJECTS YOUR GIFT OR DOES NOT GIVE YOU ONE, IT IS NOT OUT OF DISRESPECT, BUT BECAUSE OF OUR COMPANY GUIDELINES.



### ESSENTIAL ACTIONS

- n Binding rules in connection with the correct dealing of benefits from third parties.
- n Implementation of corruption prevention measures (e.g. trainings, workshops etc.).
- n Contractual alignments with business partners to act in line with anti-corruption laws and corresponding regulations.
- n Offering benefits not with the intention to influence decisions illegitimately or gain an illegal advantage.

## FAIR COMPETITION

We strictly prohibits anti-competitive agreements. We require our business partners to be committed to free and fair competition and to observe applicable laws, in particular competition and anti-trust legislation.

### ESSENTIAL ACTIONS

No practices with competitors to distort the market e. g. price fixing, bid rigging, segregation of markets and customers.



## EXPORT CONTROL

VIJAY COPOLYMERS expects its business partners to comply with applicable export control legislation and to share with VIJAY COPOLYMERS any relevant information without undue delay. VIJAY COPOLYMERS will not make any business with partners, who are subject to international sanction lists.

### ESSENTIAL ACTIONS

- n Have procedures in place describing the export control process in the company.
- n Conduct a comprehensive export control screening of all relevant business partners and countries.

## DATA PROTECTION

VIJAY COPOLYMERS is dedicated not only to the protection of its own personal data and privacy, but also to that of its business partners. Our business partners are therefore expected to comply with pertinent laws on data protection and on the use, modification and disclosure of VIJAY COPOLYMERS's personal data.

### ESSENTIAL ACTIONS

To observe statutory data protection laws and regulations.



## INTELLECTUAL PROPERTY

We respect the intellectual property rights of others and expects the same of its business partners.

This means not to infringe another party's intellectual property rights, use copyrighted materials or third-party trademarks without permission of the copyright or trademark owners.

### ESSENTIAL ACTIONS

To observe existing intellectual property rights.



## PHYSICAL PROPERTY

VIJAY COPOLYMERS expects that all kinds of materials used by business partners will be used with care, in an economical manner and only for legal purposes.

### ESSENTIAL ACTIONS

⁂ Products are stored, prepared, loaded and transported safely and with reasonable care.

⁂ Physical property of VIJAY COPOLYMERS is protected against unauthorized access.

## CONTACT

Any concerns related to the conduct of VIJAY COPOLYMERS's employees or business partners should be reported immediately to our Head Office or can be informed on [admin@vijaycopolymers.com](mailto:admin@vijaycopolymers.com)