

# **VJDS International Inc. Ethics and Transparency Policy**

Effective Date: 20th March 2013

Approved By: Directors

Owned By: VJDS International Inc.

Updated: 17th November 2024

## **1. Purpose**

At VJDS International Inc., we are committed to conducting our business in an ethical, transparent, and responsible manner. This policy provides clear guidelines for maintaining the highest standards of integrity in our interactions with employees, customers, partners, investors, and other stakeholders. We believe that transparency and ethical behavior are fundamental to building trust, protecting our reputation, and achieving long-term success.

This Ethics and Transparency Policy sets the framework for our decision-making, ensuring that we adhere to legal and regulatory requirements while upholding the core values of fairness, honesty, and accountability.

## **2. Core Ethical Principles**

We adhere to the following ethical principles in all aspects of our business:

- Integrity: We are committed to doing the right thing, even when it is difficult or when no one is watching. Our actions reflect honesty, fairness, and moral clarity.
- Accountability: We take responsibility for our actions and decisions. We hold ourselves accountable to our employees, customers, and other stakeholders.
- Transparency: We are committed to being open and honest in all our communications and operations. We share accurate and timely information to foster trust and clarity in our relationships.
- Respect: We treat everyone with dignity and respect, valuing their opinions, backgrounds, and contributions. We foster an inclusive environment where diverse perspectives are heard and appreciated.
- Compliance: We comply with all relevant laws, regulations, and industry standards in the countries where we operate. We also adhere to best practices in business ethics.

## **3. Commitment to Transparency**

We believe that transparency is essential for building trust with our stakeholders. We are committed to the following practices:

- Clear Communication: We provide stakeholders with accurate, timely, and understandable information about our business operations, financial performance, and corporate governance. We aim to avoid misleading statements or omissions that could create false impressions.

- Disclosures: We ensure that any material information that could affect stakeholders' decisions is disclosed promptly and in compliance with applicable laws and regulations. This includes financial disclosures, corporate actions, and material risks.
- Open Reporting: We encourage employees and other stakeholders to report concerns or potential issues regarding unethical behavior, compliance breaches, or any other matters that may impact the integrity of the company.
- Access to Information: We strive to ensure that our business practices are easily understandable and accessible to stakeholders. This includes making important documents, policies, and performance reports available to the public, where appropriate.

#### **4. Ethical Decision-Making**

All employees are expected to make decisions in line with our ethical values. In situations where ethical issues arise, employees should:

- Consult the Code of Ethics: Refer to the company's Code of Ethics (if applicable) to guide decision-making and identify potential ethical conflicts.
- Seek Guidance: If unsure about an ethical dilemma or situation, employees are encouraged to seek guidance from their manager, HR, or the compliance officer. In some cases, consulting legal counsel may be appropriate.
- Consider the Impact: When making decisions, consider the impact on employees, customers, the community, and the environment. Aim to balance business objectives with responsible practices.
- Report Violations: If you become aware of any actions that violate this policy or ethical standards, report them immediately through the company's reporting mechanisms (e.g., whistleblower hotline, compliance officer, HR).

#### **5. Anti-Corruption and Anti-Bribery**

We have zero tolerance for bribery, corruption, or any form of unethical business conduct. All employees, contractors, and business partners must adhere to the following:

- Prohibition on Bribery: Employees and agents must not offer, give, or accept bribes or other illicit payments in exchange for business or favorable treatment.
- Gifts and Hospitality: Any gifts or hospitality provided to or received from business partners, customers, or suppliers must be reasonable, transparent, and compliant with the company's policies on gifts and entertainment. Employees should report any gifts or hospitality that exceed a nominal value.
- Fair Competition: We are committed to competing fairly and transparently in the marketplace. We will not engage in practices that could lead to anticompetitive behavior or fraud.

## **6. Confidentiality and Privacy**

We respect the confidentiality of sensitive information and are committed to protecting the privacy of individuals. This includes:

- Data Protection: We comply with all applicable data protection laws and regulations to ensure that personal and sensitive data are handled appropriately and securely.
- Non-Disclosure of Confidential Information: Employees must not disclose or misuse confidential information related to the company, its customers, or its business partners. This obligation extends beyond the term of employment.
- Respect for Intellectual Property: We respect the intellectual property rights of others and ensure that our use of third-party intellectual property complies with licensing agreements and relevant laws.

## **7. Conflict of Interest**

Employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of the company. This includes:

- Disclosure of Conflicts: Employees must disclose any potential or actual conflicts of interest to their manager or the HR department. Conflicts of interest include personal relationships, investments, or outside business interests that could influence job performance or decision-making.
- Avoiding Competing Interests: Employees are expected to refrain from engaging in business activities that directly compete with the company, or that might affect their impartiality in decision-making.

## **8. Reporting and Whistleblowing**

We encourage employees and other stakeholders to report any ethical concerns or violations of this policy. We provide the following mechanisms for reporting concerns:

- Confidential Reporting: Employees can report concerns confidentially through the company's [Whistleblower Hotline/Email/Online Portal] or to the designated Compliance Officer, HR, or management.
- Non-Retaliation: The company prohibits retaliation against any employee who reports a concern in good faith, even if the report turns out to be unfounded. Retaliation or harassment will not be tolerated and may result in disciplinary action.
- Investigation: All reports of unethical behavior or policy violations will be thoroughly investigated. If the report is found to be valid, appropriate corrective action will be taken.

## **9. Compliance and Enforcement**

It is the responsibility of all employees to uphold the principles of this policy. Violations of this policy may result in disciplinary action, up to and including termination of employment. In cases of legal violations, the company may refer the matter to law enforcement or regulatory agencies.

We will review and update this policy as required to ensure its effectiveness and to keep pace with evolving laws and best practices.