

CODE OF CONDUCT

DOING THE RIGHT THING, ALWAYS!

Purpose

At 3Vima, doing the right thing guides how we work and live. Our Code helps us meet our ethical and legal commitments and stay on track when there are questions or situations where the right course of action may be unclear. By following the Code, you maintain, strengthen and protect our strong reputation for following the law and our values.

Applicability

Regardless of business or location, we all are responsible for maintaining compliance with this Code and other 3Vima policies and procedures. In this Code, “we” or “our” refers to employees, including short-term workers and consultants working within 3Vima, officers and directors. We also expect our business partners, such as agents, suppliers, contractors, intermediaries, representatives and joint venture partners, to follow the principles set out in this Code and to share our commitment to our values. You may face a situation where a local custom or a particular customer’s policy is accepted as normal but differs from our values, policies or applicable law. If this occurs, you must comply with the higher standard.

Our shared expectations

To be successful, we all must act with honesty, openness and fairness. We have a responsibility to ensure that our individual behavior and our work meet legal standards as well as the high expectations of our Code, policies and values. You are responsible for reading, understanding and remembering the information in our Code.

Everyone must:

- Act in a manner that is safe, ethical and consistent with laws, regulations and 3Vima values and behaviors
- Report concerns of any known, suspected or potential misconduct or Code violation, or ask questions about the right course of action, to our 3Vima leadership

Anti-retaliation

You must feel safe to report any suspected violation of our Code. Therefore, 3Vima does not allow acts of retaliation against any person for reporting a possible violation or participating in an investigation as long as the report was made in “good faith.” Those who retaliate against someone for reporting or cooperating with an investigation may face disciplinary action up to and including termination. For questions, or to report retaliation, consult our 3Vima leadership.

Consequences for violations

Violations of our Code, policies or the law may carry serious consequences for the individuals involved as well as 3Vima. Such behavior may place individuals and 3Vima at risk of bodily harm, damaged reputation, fines and even possible civil or criminal liability. Employees or consultants who violate the law, our Code or our policies may also be subject to disciplinary action up to and including termination. Violations committed by non-employees, including a third party working on our behalf, may result in the termination of any relationship with 3Vima.

Workplace safety and health

Why does it matter?

By taking personal responsibility for health and safety, we all ensure that everyone goes home safe and well.

What does it mean for me?

You can demonstrate care and commitment by:

- Always following the rules and procedures, including the Life Saving Rules
- Always behaving in accordance with our Safety Essentials
- Immediately reporting any injury or ill health that is related to our work
- Only performing tasks for which you are trained and competent to do
- Always reporting health and safety hazards and concerns to 3Vima leadership
- Always intervening and stopping the job if you believe that something is unsafe or a risk to health
- Never working under the influence of illegal drugs, alcohol or prescribed drugs that affect our ability to work safely
- Never bringing personal weapons that can harm others, such as guns, into the workplace

For more information, refer to the Health, Safety, Security & Environment Policy of 3Vima

Protecting the environment

Why does it matter?

We care about the communities in which we operate, and we strive to leave a positive legacy long after our operations have concluded. We are committed to minimizing our impact on the environment through conserving resources, reducing waste and emissions and preventing environmental pollution.

What does it mean for me?

You can protect our environment by:

- Complying with relevant laws and regulations at all times
- Managing all environmental risks effectively
- Eliminating, or minimizing where elimination is not possible, any negative environmental impacts resulting from our operations
- Working closely with 3Vima's personnel, regulators and other external stakeholders to promote continuous improvement in our industry

For more information, refer to the Health, Safety, Security & Environment Policy of 3Vima

Equal opportunity

Why does it matter?

We are dedicated to fostering an inclusive work environment and treating everyone on the team equally, with respect and compassion. We care about our people and recognize that when people are cared for, they perform better.

What does it mean for me?

You play a part in creating a rich, inclusive work environment by working collaboratively to achieve our goals, embrace diversity, and encourage contributions from all of our colleagues. 3Vima has zero tolerance for discriminating for any reason.

You must never make employment-related decisions or discriminate against anyone based on a legally protected characteristic such as race or ethnicity, age or gender.

All employment decisions, including hiring, promotion and training, must be made on the basis of merit, talent and suitability and must comply with local laws.

Confidentiality

Why does it matter?

Trade secrets and confidential and proprietary information are valuable assets. Protecting them is vital to our success. Our customers and employees expect us to maintain strict controls on the confidential information we hold or use. Sharing or using confidential information incorrectly can have serious consequences, including significant fines and penalties, criminal charges and loss of customer trust.

What does it mean for me?

Do not reveal confidential information to anyone unless authorized or legally required to do so. Avoid discussing confidential information in places where you might be overheard, including restaurants, restrooms, taxis, airplanes or elevators. Do not disclose confidential information to anyone who does not have a business need to know it. Never accept or use the confidential information of our competitors; this may be illegal and would be considered serious misconduct. Do not take confidential information with you if your employment with 3Vima ends.

If you discover or suspect the unauthorized use or disclosure of confidential information, notify 3Vima leadership immediately.

Confidential information can take many forms, such as technical information about our products and services, engineering designs, drawings and layouts, analyses and forecasts, customer and supplier lists, non-public financial information, employee information, company-specific know-how, and information relating to or supplied by our shareholders, customers and other business partners.

Data privacy

Why does it matter?

Partners, shareholders, customers and other individuals often trust us with personal data and confidential information. Keeping personal data safe represents a fundamental element of maintaining the trust of our employees, customers and stakeholders. We are obligated to comply with all data privacy laws laid out by Govt. of India

What does it mean for me?

Keep all data secure and do not give anyone access to personnel information without proper authorization based on a business-related need. Treat third-party data with the same care you treat 3Vima's information, and respect our third parties' privacy policies and information security requirements. Know and comply with all data protection laws that affect the acquisition, maintenance and use of personal data, and uphold our policies and procedures for data protection and privacy wherever 3Vima does business

Intellectual property (IP)

Why does it matter?

Our IP is a valuable asset and provides us with a competitive edge. Safeguarding our IP is one way we continuously improve, expand and protect our presence in the marketplace.

What does it mean for me?

Protect and enforce our IP rights at all times. Only disclose our IP for business purposes and under appropriate protections. Report any concerns regarding the misuse of our IP. Under our standard employment terms and conditions, 3Vima will own the rights to all IP created during Company time, using Company materials or within the scope of our duties. Do not take 3Vima IP with you when you leave the Company, even if you created the IP.

Physical property

Why does it matter?

We are responsible every day for the use, care and protection of physical assets belonging to 3Vima and our customers. This property includes equipment, vehicles, facilities, funds, customer tools and documentation.

What does it mean for me?

Be careful in how you use property belonging to 3Vima or our customers and use it for business purposes only, while taking care to protect it against theft, damage or misuse.

Ethics, Anti-Bribery and Corruption

Why does it matter?

At 3Vima, we believe that an ethical way of doing business is the only sustainable way. Hence, it is 3Vima's policy to conduct all of its business in an honest and ethical manner. Further, if 3Vima or any of its employees or associated persons (e.g. contractors, agents or subsidiaries) is found to have taken part in corruption, 3Vima could face an unlimited fine, and it could face serious damage to its reputation both in the public markets and in the countries in which it operates. 3Vima therefore takes its legal responsibilities very seriously.

What does it mean for me?

3Vima takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships. It is the goal of 3Vima to avoid acts which might reflect adversely upon the integrity and reputation of the Company.

Individuals involved in unethical activities, bribery or corruption shall face a formal enquiry and if punitive measures ranging from written warning to termination from services. The local laws pertaining to such acts will be applicable, which may have consequences of fines or sentence to imprisonment.

3Vima is committed to upholding all laws relevant to countering bribery and corruption in each of the jurisdictions in which it operates. As the anti-corruption laws in certain countries, such as the UK, US and Canada, have extraterritorial application, 3Vima and its employees and associated persons will be bound by the most stringent requirements of these laws in respect of its conduct in all jurisdictions they operate, even if such conduct would otherwise be permitted by the local law of a particular jurisdiction.

Third parties

Why does it matter?

Third parties and commercial intermediaries play an important role in helping us conduct our business, including helping us arrange negotiations and services and representing our interests more efficiently than otherwise might be possible. However, they present a significant risk to our organization. We are ultimately responsible for the actions of anyone acting on our behalf. What they do can adversely affect our reputation and result in criminal penalties for 3Vima.

What does it mean for me?

Throughout the lifespan of any business relationship, 3Vima must monitor our business counterparts to ensure we are collaborating ethically and safely. The rules around collaborating with third parties or commercial intermediaries are strict.

3Vima collaborates ethically and safely with third parties by:

- Engaging in fair and open competition
- Ensuring suppliers or other third parties are reputable and qualified
- Ensuring that the hiring of a supplier or other third party does not create an actual or apparent conflict of interest