



V.K.ENGINEERING

AN ISO 9001:2015 COMPANY

ORGANISATIONAL CODE OF CONDUCT

WE VALUE OUR COMMITMENT

A MESSAGE FROM LEADERSHIP



We at V.K.Engineering stand committed to maintain the highest level of integrity, fairness and responsibility. Our code reflects who we are and what's important to us. It guides us each day as we strive to meet our obligations to all our customers, employees and to ourselves.

We recognise that it is of utmost importance to maintain ethical behaviour while conducting business. It needs to be cultivated and repeatedly affirmed throughout the organisation. Our code provides an overview of the laws, regulations and company policies that apply to us and the work we do. That's why we count on every employee our company to follow the code and make decisions that will preserve the trust that others have placed in us. We expect nothing less from our partners, consultants, co-manufacturers and suppliers.

We should all remember our duty to speak up whenever we see or suspect illegal or unethical activity. If something doesn't look or feel right to you, raise the issue. Don't ever hesitate to report a possible violation or concern.

A company is only as good as its people and we believe our people are the best.

RAJENDRA.K.CHORDIA
PROPRIETOR

OUR HERITAGE



We V.K.ENGINEERING, An ISO 9001:2015 Company are known as the foremost and reputed Manufacturer, Exporter and Supplier of an ample collection of Machined Component. There are a lot of companies around the globe working hard to build consumer loyalty and trust in their company and thanks to the efforts of our team of employees at V.K.Engineering we are already on the path to be well known in the industry.

From the humble beginnings, Mr. Rajendra .K. Chordia started this company in 1991 with a limited setup of machinery. Today, we are a company that produces a large array of components for our clients in Seal, Valves, Automobile as well as Medical industry. The entire range is highly admired by our clientele for the precision work, sturdy construction & durability. All the products we manufacture are in compliance with industry standards and can be availed by our clients in standard and customised specifications. These are delivered to clients in specified time frames at most reasonable rates. People know us not only for what we make, but also for our dedication towards our work. We have built a reputation for being ready always to accept challenges and successfully fulfilling them too. We realise that a company prospers only when its employees do and so at V.K.Engineering, employees are made aware about the latest trends in the industries and are trend accordingly for the required skill set. Employee health and safety are important to us to. Regular health check-ups are conducted for our employees and they are also awarded with med claims. At V.K.Engineering, preserving our strong ethical culture is a top priority. We must continue to embed the values of integrity, fairness, and accountability in all that we do. We all share a responsibility to build on this proud heritage, and to maintain exceptional relationships with our customers, each other and the neighbourhood and communities in which we operate. We must never underestimate the importance of our conduct, and always take personal responsibility for our actions — it is how we do business. The Code of Conduct is our shared commitment to operate with the highest level of integrity and ethical conduct.

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WE HAVE PRIDE IN OUR CODE

WHAT BETTER DAY TO START THAN TODAY

Changing the world begins with a very personal process of changing yourself. The only place this change could begin is where you are right now and the only time you could begin is now.

Our people, our services and our enduring commitment to integrity have made us one of the most respected manufacturing unit in the industry. We all share responsibility for preserving and building on this proud heritage. A strong reputation can't be bought or sold and should never be compromised. Code of Conduct — it begins with you.

KNOW YOUR RESPONSIBILITIES

No matter what job you do or where you do it, you are a member of V.K.Engineering. Think about that as you watch over every business relationship, every transaction and every product, and make sure your actions always reflect our values.

Follow our code and policies as well as the laws and regulations of the country where you work, and protect what we've built. If you see or suspect anything illegal or unethical, it may seem easier to look the other way or let someone else take the lead—but misconduct affects all of us. No concern is too minor to report. Share your concerns promptly and cooperate fully and honestly in any internal investigation. Be aware that anyone who violates our code may face corrective action, up to and including termination of the employment with V.K.Engineering.

If you manage people, you have an even greater responsibility. Create the kind of workplace where employees feel comfortable coming forward with questions and concerns, and support them when they raise issues. Never retaliate against employees for sharing concerns in good faith, and prevent retaliation by others.

SPEAK UP WITHOUT FEAR

As a company we know it takes courage to come forward and share your concerns. We won't retaliate or permit retaliation against anyone who makes a good faith report about possible misconduct or legal violations to us or a government authority or assists in an investigation of misconduct or legal violation. Regardless of who you contact, you can be confident that you're doing the right thing and that your concern will be handled promptly and appropriately.

KNOW WHERE TO GO FOR HELP

Have a question, problem or a concern? In most cases, you should directly contact the shop floor manager. He or she is likely in the best position to understand your concern and take the appropriate action. If you're uncomfortable speaking with your manager, or if you have already shared a concern and feel it's not being addressed appropriately, reach out to the proprietor of the company.

Nothing in the Code prohibits you from communicating with government agencies about possible violations of central, state or local laws or otherwise providing information to government agencies, filing a complaint with government agencies, or participating in government agency investigations or proceedings, and the Code does not require you to notify the Company of any such communications.

You can also report an actual or suspected misconduct anonymously on our company website by clicking MAKE A REPORT button at the end of the homepage or click on the following link <http://www.vkengineering.co/report-a-misconduct/>

WHAT IF?

There is a conflict between what's in our Code and the laws in the country where I work. I'm not sure what to do.

The best approach is to follow the stricter requirement, and if that's not clear, seek guidance from the management.

I suspect—but am not certain—that someone is violating our Code. Should I keep my concerns to myself?

No. If you suspect a violation, say something. It's better to raise a potential problem than to wait and risk harm to others or to the company. Reporting "in good faith" means you are coming forward honestly with information that you believe to be true, even if, after investigation, it turns out that you were mistaken.

Culturally, it's not common to report a concern about someone that is in a leadership position. What should I do?

It's important to say something about your concerns. We respects our diverse workforce, consider various cultural norms when looking into concerns and take all appropriate actions to protect the identity of the person who is sharing the information, as well as the information that's being shared.

WE PROMOTE AN ETHICAL WORKPLACE

RESPECT OTHERS

We're one team, but we represent many ideas, experiences and backgrounds. We value each other's contributions and believe that everyone should have an equal chance to succeed. This is essential to advancing our goals and initiatives.

Do your part to keep the workplace a diverse, inclusive and respectful workplace by driving a positive environment, and recognize the many strengths and talents our diverse colleagues bring to the workplace.

MAINTAIN A SAFE WORKPLACE

We value the safety and security of every employee. We look out for each other. We follow our safety procedures and promote a culture of safety, because our people are our greatest asset. Every employee is empowered to take immediate action for people safety regardless of role, title or responsibility. If you see a situation that could put others at risk, take action, and at all times and in all places, work to keep yourself and your co-workers injury-free.

Observe a zero-tolerance policy when it comes to acts or threats of violence. Be alert to what is going on around you, observe good security practices and speak up about any threats of potential violence. We prohibit weapons on all of the company's properties consistent with local law—if you have concerns that someone may have a weapon on our property, report it immediately

Having, using or distributing alcohol or illegal drugs is also prohibited by our policies because substance abuse can impair your judgment, your performance and the safety of those who work with you.

UPHOLD HUMAN RIGHTS

We are committed to fair employment practices always. As a company, we respect the rights of every individual and abide by the employment laws in the markets where we operate. We support the principles of Human Rights and do not knowingly conduct business with any individual or company that participates in the exploitation of children (Including child labour), physical punishment, forced or prison labour or human trafficking.



What can you do? Follow the employment laws where you work, be alert to abuses and speak up if you see or suspect possible labour law or human rights violations.

WHAT IF?

My senior often loses his temper and yells at all the people on the team when we miss a deadline. Is that harassment?

It depends, but regardless, the situation creates a negative work environment. This behaviour is something that the company will address because it violates the commitment we've made to a respectful workplace. Share your concerns with management.

One of our customer is making insulting, age-related remarks to one of my co-workers. Should I say something?

Yes. If you're comfortable doing so, ask the supplier to stop. If you prefer, share your concerns with your manager or the proprietor. We don't tolerate any form of harassment, whether the action is initiated by—or directed at—an employee, a customer, a supplier or anyone else in our workplace (or at a work-related event).

I suspect a co-worker has a drinking problem, and I'm concerned about him. What should I do?

Never compromise when it comes to safety—his or yours. Share your concerns with your senior to give V.K.Engineering the opportunity to address the issue and help him in every possible way.



WE UNDERSTAND OUR RESPONSIBILITY TOWARDS OTHERS

PRESERVE PRODUCT QUALITY AND SAFETY

While placing a manufacturing order with us, our clients are rest assured that their components are in skilled hands and that they will be getting a safe, high-quality product. We want to preserve their trust. We care deeply about product quality and safety and make sure our work meet or exceed our own internal standards, as well as the standards set by laws, regulations and our clients.

Product quality depends on all of us, and you are a key player in stopping any kind of defects. Plan to ensure safe storage and labelling of raw materials, proper cleaning procedures for each and every equipment despite its usage.

WHAT IS PRIVATE SHOULD REMAIN PRIVATE

We respect the privacy of our clients, our co-workers and others with whom we conduct business. We handle their personal information with care. “Personal information” is any information that could be used to identify someone, either directly or indirectly, such as a name, email address or phone number. There are data privacy laws prescribed to us by our clients on how to responsibly collect, store, use, share, transfer and dispose of personal information, and we strive to comply with those laws.

Follow our internal data handling policies and protect any personal information that is entrusted to you. Use it only in the way it’s meant to be used and don’t share it with anyone inside or outside of the company in an unauthorized manner.

Practice good cybersecurity, too. Make sure you follow the processes and practices we have in place to protect our networks, computers, programs and data from attack, damage or unauthorized access. .

WHAT IF?

One of the quality inspection tests that we perform on a product is repeated further down the production line. Why not skip the first test—wouldn’t that help us speed up delivery?

Skipping a required quality inspection test is never okay. If you have ideas for improving efficiency, it’s great to share them. But unless the process is evaluated and modified, it’s



critical to complete every step, as required, to make sure we're delivering a safe, high-quality product every time.

One of our new vendors wants to say “hello” and connect with my co-workers. The vendor has asked me for a list of my co-workers’ names and addresses. Is it okay to provide them?

Before doing anything, contact the management. Even if the intent behind the request is well-meaning, and even if your co-workers might like to connect with our vendor supplying this information would violate our commitment to keeping private information private.

An auditor from our client company shows up to inspect our shop floor as part of providing us the approval we need in order to operate. What should I do?

Gather details about the inspection. Then, explain to the auditor that you will do what you can to ensure the company responds to the request in a timely manner, and contact the management.



WE DO THE RIGHT THINGS ALWAYS

NEVER BRIBE

We compete for business based on our expertise. That's how we operate. Work honestly and with integrity. Don't offer bribes, accept bribes or let others bribe for you. And do everything you can to prevent bribery by others who conduct business with us or on our behalf—as a company, we're not only responsible for our actions, but also the actions of anyone who represents us.

Remember, a bribe can be something other than cash. A gift, a favour, even an offer of a loan or a job could be considered a bribe if it's offered in exchange for a decision. Before offering anything of value, check our policies and ask questions about what's okay (and what's not).

The rule is simple: bribery of anyone, at any organization, at any level is always wrong.

KNOW THE RULES ABOUT GIFTS AND ENTERTAINMENT

An occasional gift or offer of entertainment is often viewed as a normal part of doing business. But sometimes even a well-intentioned gift or offer can cross the line. And any gift that creates a sense of obligation or compromises your professional judgment is always inappropriate.

That's why we have guidelines in place—to identify the circumstances under which an offer is okay and when it's not. Make sure you follow the rules, and be aware of any special restrictions. For example, giving anything of value to a government official can be problematic. Always ask for help from the Law Department if the right thing to do is unclear.

Always use good judgment. Turn down any offer if it is being given to influence a decision or if it would give the appearance of something improper, even if it is within the value limits that may be acceptable to the company. Never ask anyone for a gift, meal or entertainment, and if someone asks you, don't oblige.

COMPETE FAIRLY

Becoming aware of competitive information may be normal based on your role or responsibility at the company, but make sure you treat that information ethically and lawfully. Compete fairly, but vigorously, and never use deception or misrepresentation or abuse confidential information to gain an unfair advantage over our competitors.



When you talk with customers, provide only truthful information about the quality, features and availability of our products, and don't make disparaging remarks about our competitors. Deal fairly with our customers, suppliers and competitors.

Do not talk about our business strategies and plans with competitors. Never enter into any agreement or understanding, whether formal or informal, with a competitor, customer or supplier.

KEEP ACCURATE RECORDS

Integrity in our recordkeeping inspires trust by customers. Our long-term success depends, to a large extent, on how well we manage our business. Our records and our recordkeeping help us to fulfil our financial commitments and pay our people. But they also provide a picture of our financial health.

They are the basis on which we make important strategic decisions. That's why records that are clear, complete and accurately reflect our business transactions are critical company assets.

Each of us has an obligation to follow all internal controls in recording and maintaining our company books and records. In every transaction, whether you are complying with disclosure requirements, preparing a financial statement or simply completing a process sheet, be honest, accurate and complete.

FOLLOW STANDARDS AND COMPLIANCE RULES

We are committed to comply with global trade rules. As a company which is in business with various MNCs, we consider it as our most important duty to comply with various standards and compliances rules required by our customers as well as the different organisations governing the industry we work in.

If you are involved in the movement of products or services across the international borders, make sure you know and comply with the requirements associated in doing business in the particular countries.

Make sure anything intended for import or export is classified correctly, in advance, based on the country of origin, the destination, the end use and the end user. It must include all required documentation, labelling, licensing, permits and approvals. Ensure the integrity of our supply chain—communicate our policies to others who conduct business on our behalf.



WHAT IF?

A friend of mine asked if I can help his son get an internship at our company. He says he can make it worth my while.

Don't do it. "Worth your while" suggests that your friend may be planning to do something improper in exchange for the favour. You can provide your friend with the information about an internship and allow his son to apply as all other candidates do. Doing anything more than that could be viewed as a bribe.

I receive a gift from a customer that I know I can't accept. What should I do?

Return the gift to the customer and politely explain our policy. If the gift is something perishable, like flowers or a food basket, where return is not really an option, share it with your colleagues so that it can be enjoyed by everyone.

One of our vendors offers me tickets to a concert that he can't attend, can I take them?

No. Even if the value of the tickets falls within the limits of our policy, the event doesn't offer an opportunity to enhance your relationship with the vendor or his company, since he will not be attending with you. In fact it may create a situation wherein you may be needed to repay his seemingly kind gesture in some way.

I ran into an old colleague who now works for one of our competitors. He asked me how business was going. What should I do?

There is no problem with responding in a general, non-specific way to say that all is well, but keep your conversation normal and be aware that simply having a conversation with a competitor can give the appearance to others of something improper.

I saw a co-worker fill up an inspection report when he hadn't actually done the inspection. What should I do?

You should report what you saw to your manager or the concerned authority. Filling the report when he had not actually done the inspection would be considered a form of falsifying records and would violate our Code.

WE SAFEGUARD OUR COMPANY

PROTECT OUR ASSETS

We're good stewards of our physical, electronic and information assets. Our assets include everything that our company owns or uses to conduct business. Each of us is entrusted with the care of these assets, so be proactive in safeguarding them from loss, damage, theft, waste and improper use. Physical and electronic assets such as furniture, equipment, tools, inventory, computer hardware and software are provided in order for you to do your job. Occasional personal use of assets such as phones, computers, email and the Internet is permitted, but make sure your use doesn't interfere with work (yours or anyone else's). Be aware that anything you write, send, download or store on our systems is company property, and we may monitor your use—you shouldn't have any expectation of personal privacy when using our systems. Information is also a critical asset.

Confidential information and intellectual property represent the outcome of significant company investment and years of hard work. Trade secrets, patents, copyrights, trademarks, business plans, engineering ideas, databases, customer lists—when you help protect these assets, you help protect our competitive advantage.

Protect our property at any cost.

- Report any property or equipment that is damaged, unsafe or in need of repair.
- Don't lend, sell or give anything away unless you're authorized to do so. Protect our systems:
 - Ensure the physical security of hardware that's assigned to you.
 - Protect your password(s).
 - Don't install unauthorized software, applications, hardware on your computer
 - Don't use unlicensed software or make copies of software to use at home
 - Be alert to phishing scams or other attempts to uncover sensitive information.
 - Don't open suspicious links in emails, even if you know the source. Protect our information:
 - Share confidential information only when there is a legitimate reason for doing so.
 - Protect confidential information even if your employment with V.K.Engineering ends.



Protect the information of others. You have a responsibility to not only protect confidential information about our company, but also the confidential information of companies with which we do business.

AVOID CONFLICTS OF INTEREST

We don't let personal interests affect business decisions we make on behalf of V.K.Engineering. A conflict of interest can happen anytime something you do outside of the workplace interferes with the work you do inside the workplace. It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise. And being able to recognize a potential conflict can help you avoid one.

When making decisions related to V.K.Engineering, you have a duty to act in our company's best business interests and avoid even the appearance of a conflict. If you discover that a personal activity, interest or association could compromise or even appear to compromise your objectivity or your ability to make impartial business decisions, disclose it immediately to your superiors. Many conflicts can easily be avoided or addressed if they are promptly disclosed and properly managed.

Know a potential conflict when you see one. A conflict can happen when:

- You supervise or conduct business with someone with whom you have a close personal relationship.
- You invest in one of our suppliers, customers, business partners or competitors.
- You own or do work for a company that competes, does business or wants to do business with V.K.Engineering.
- You use the V.K.Engineering name or our property or information, without approval, to support a charitable, professional or community organization.
- You take for yourself a business opportunity that is meant for V.K.Engineering.

Remember, it's not possible to list every potential conflict of interest scenario; if you're not sure if a situation represents a conflict, ask the management. Disclose to your superior any actual or potential conflicts of interest or even situations that could suggest the appearance of a conflict.

DON'T SPEAK ON BEHALF OF OUR COMPANY

We make sure that information shared about our company is consistent, accurate and complete. When you consider the power of words, the number of ways that words can be





shared and the impact those words can have on a trusted company like ours, you begin to understand the value of sending one clear message.

In order to ensure that accurate and complete information is conveyed, we have designated the proprietor of V.K.Engineering as our official spokesperson. Unless you are authorized to do so, do not make any public statements or commitments on behalf of V.K.Engineering.

WHAT IF?

I've been approached to sit in a meeting /discussion of another company. Do I need to seek approval from someone at the company?

Yes. You should inform your manager or the concerned authority to review the situation and receive guidance on whether you can attend the discussion/meetings. Sometimes, participation in other companies' discussions/meetings may cause a conflict—we have to look at the type of company, the services it provides and any impact it may have on your responsibilities for V.K.Engineering.

I was asked to comment on one of the rumoured critical information involving our company. I know the facts about the information in question and want to set the record straight— is it okay to respond?

No. Unless you are an authorized spokesperson, you should notify your senior and let an authorized spokesperson address the situation.





WE ARE GOOD CITIZENS

BE A GOOD HUMAN BEING

In the challenges that face our planet, we understand that we are part of the solution. We strive to conduct business in an environmentally responsible manner and are committed to compliance with all applicable environmental laws and regulations.

We have set ambitious goals to minimize our environmental footprint by reducing greenhouse gas emissions, decreasing waste and limiting water and energy use at our facilities.

SHARE GOODNESS AND STRIVE TO MAKE A DIFFERENCE

Together, we make good things happen. As a company, we are committed to promote social and economic development, and we are passionate about initiatives that benefit our people and the neighbourhood where we live and work.

We also encourage employees to make a difference on a personal level. We support your involvement in charitable and political activities on a volunteer basis, but in general, ask that you do so on your own time and at your own expense, making sure your activities are lawful and consistent with our policies. Unless you receive approval in advance, please do not use or donate company funds or assets to further your personal volunteer activities.

