



V.V. Titanium Pigments Pvt. Ltd.,
A-81, Sipcot Industrial Complex,
South Veerapandiapuram PO,
Thoothukudi – 628002, Tamil Nadu, India

CODE OF BUSINESS PRINCIPLES (COBP)

1.0 CODE OF CONDUCT

V.V. Titanium Pigments Pvt. Ltd (VVTi) believes in the conduct of its operations in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity, ethical behaviour and with respect for the human rights and interests of our employees.

VVTi similarly respects the legitimate interests of all those with whom we have relationships during course of the company's business.

2.0 COMPLIANCE WITH APPLICABLE LAWS

VVTi is committed to complying with all applicable laws and regulations in the countries in which it operates.

3.0 EMPLOYEES

- i.** VVTi exhorts its employees to comply with the company's policies and code of conduct and use good judgement to make sound and ethical decisions thus ensuring that the business is conducted with integrity.
- ii.** Supervisors at all levels have additional responsibilities and are expected to
 - a)** lead by example to act with integrity.
 - b)** communicate with the employees by reporting to them to ensure compliance to the code.
 - c)** enforce the code consistently.

VVTi is committed to a thoroughly professional diversity in a working environment where there is mutual trust and respect and where every employee feels responsible for the performance and reputation of the company. We value and promote a workplace that is inclusive and fair and fosters respect for all our fellow employees, customers and business partners and maintain a work environment in which personal dignity, privacy, personal rights and safety of every individual is protected.

- iii.** We will recruit, employ and promote employees solely on the basis of merit and considering the qualifications, merit and skills needed for the work to be performed. We have performance management processes through which we ensure that every employee understands the work he is accountable for and his responsibility. All employees irrespective of job title or level will be treated fairly in matters affecting hiring, training, promotion, compensation and termination.
- iv.** We are committed to providing a safe and healthy workplace for all employees. We also work with employees and contractors to develop a culture that encourages both personal and collective responsibility for occupational health and safety.
- v.** VVTi provides equal opportunities to all its employees and we work together with individuals

of different cultures, religions, ages, marital status, sexual identity and gender.

- vi. We will comply with applicable laws for engagement of workers and will not use any form of forced, compulsory or child labour.
- vii. We encourage employees to develop and enhance their individual's technical skills and personality development by organising training programmes.

We respect the dignity of the individual and the right of employees to freedom of association.

We will maintain good communications with employees through company based information and consultation procedures.

4.0 CUSTOMERS

VVTi is committed to supplying goods of world class quality standards as per the requirements of the customers and consistently offer value in terms of price, quality and safe for intended use. VVTi strives for customer satisfaction and expects all its employees to be customer centric in approach.

5.0 BUSINESS PARTNER

VVTi is committed to establishing mutually beneficial relations with our suppliers, customers and business partners.

In our business transactions we expect our partners to adhere to business principles consistent with our principles and policies.

6.0 SOCIAL RESPONSIBILITY AND COMMUNITY ENGAGEMENT

VVTi strives to be a trusted corporate citizen and, as an integral part of society, to fulfill our responsibilities to the societies and communities in which we operate.

7.0 PUBLIC ACTIVITIES

VVTi companies are encouraged to promote and defend their legitimate business interests.

VVTi will co-operate with governments and other organisations, both directly and through bodies such as trade associations, in the development of proposed legislation and other regulations which may affect legitimate business interests.

VVTi is neutral and neither supports political parties nor contributes to the funds of groups whose activities are directed to promote party interests.

8.0 THE ENVIRONMENT

VVTi is committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business.

VVTi will work in partnership with others to promote environmental care, address any environmental issues and disseminate good practices.

9.0 INNOVATION

In our scientific innovation to meet consumer needs, we will respect the concerns of our consumers and of society. We will work on the basis of sound science, applying stringent standards of product quality and safety.

10.0 COMPETITION

VVTi believes in vigorous yet fair competition and supports the development of appropriate competition laws. VVTi company and employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations.

11.0 BUSINESS INTEGRITY

VVTi does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give or receive any gift or payment which is, or may be construed as being, a bribe. Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

VVTi accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

12.0 CONFLICTS OF INTERESTS

All VVTi employees are expected to avoid personal activities and financial interests which could conflict with their responsibilities to the company.

VVTi employees must not seek gain for themselves or others through misuse of their positions.

13.0 COMPLIANCE

Compliance with these principles is an essential element in our business success. The Director is responsible for ensuring these principles which are enforced throughout VVTi.

The Vice President (VP) / General Manager (GM) is responsible for implementing these principles and is supported by the representatives from the Supply Chain and Human Resources.

14.0 REPORTING ON BREACHES

We support and encourage those who report actual or suspected breaches without any fear of retaliation.

Any failure to comply with this Policy (including any failure by a team member of VVTi or anyone acting on behalf of VVTi to so comply), of which the supplier is aware, should be immediately reported through our email id: hr@vvtitanium.in

The VVTi employees can make the protected disclosure by keeping their identity anonymous and put it into suggestion box kept near ASO Room. The failure to do so will be considered as a breach of this Policy.