V. V. MINERAL

CODE OF CONDUCT

Applicable to all Directors, Senior Management and Employees of the company

PREAMBLE:

VV Mineral is an IMS certified organisation. The IMS certification includes

- i. Quality Management System ISO 9001:2008
- ii. Environmental Management System ISO 14001:2007 and
- iii. Organisation Health and Safety System ISO 18001:2007

VV Mineral is committed to Total Customer satisfaction, by providing products of international standards, using eco-friendly process/ materials and ensuring health and safety of the employees.

VV Mineral achieves the above goals by

- Preventing pollution, ill health and injury
- Continual improvement of HSEQ management and performance
- To comply with applicable legal and other requirements
- Communication and training to all employees/ contractors
- Optimum use of energy and natural resources
- Meeting or exceeding customer requirements
- Continual technical up-gradation to meet optimum efficiency and effectiveness

GOVERNANCE POLICY:

The company believes and lays emphasis on a good governance policy to guide the conduct of the affairs of the company and delineates the roles and responsibilities of the key personnel

Employee recruitment

The company recognizes that employees at all levels from top management to the junior levels are its greatest assets and all employees in dealing with each other shall uphold values – trust, teamwork, mutual collaboration, meritocracy, self- respect and human dignity. The selection and recruitment processes lay emphasis not only on meritocracy but also other values to ensure long term interest of the company.

Equal opportunities employer

VV Mineral shall provide equal opportunities to all its employees and all qualified applicants for employment without regard to their race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or

disability. Human resource policies shall promote diversity and equality in the workplace, as well as compliance with all local labour laws.

A Gender Friendly Workplace

VV Mineral is committed to a gender friendly workplace. It seeks to enhance equal opportunities for men and women, prevent/stop/redress sexual harassment at the workplace and institute good employment practices.

VV Mineral maintains an open door for reportees; encourages employees to report any harassment concerns and is responsive to employee complaints about harassment or other unwelcome and offensive conduct. The company demonstrates and promotes professional behaviour and respectful treatment of all employees.

Only Adult workers

VV Mineral ensures employment of only adult workers in all its operations in compliance with local laws.

Relationships with Suppliers and Customers

All directors, senior management and employees shall ensure that in their dealings with suppliers and customers, the Company's interests are never compromised. Accepting gifts and presents of more than a nominal value, gratuity payments and other payments from suppliers or customers will be viewed as serious breach of discipline as this could lead to compromising the Company's interests.

Legal Compliance

It is the Company's policy to comply fully with all applicable laws and regulations covering Mining, Workmen, Production facilities and Environment. Ensuring legal and regulatory compliance is the responsibility of the Directors and Top management.

Health and Safety

The Company attaches great importance to a healthy and safe work environment and is committed to provide good physical working conditions and encourages high standards of hygiene and housekeeping. Particular attention is paid to training of employees to increase safety awareness and adoption of safe working methods, particularly designed to prevent serious or fatal accidents.

Environment Policies

The Company believes that commitment to sustainable development in a socially responsible manner is of prime importance and deserves to be accorded the highest priority. Accordingly, the Company is committed to complying with applicable laws

and regulations and adopting best practices in environmental matters.

PERSONAL CONDUCT

All directors, senior management and employees have the obligation to conduct themselves in an honest and ethical manner and act in the best interest of the Company at all times. They are expected to demonstrate exemplary personal conduct through adherence to the following:

Avoidance of Conflict of Interest

All directors, senior management and employees must avoid situations in which their personal interest could conflict with the interest of the Company.

Transparency and Auditability

All directors, senior management and employees shall ensure that their actions in the conduct of business are totally transparent except where the needs of business security dictate otherwise. It shall be necessary to voluntarily ensure that areas of operation are open to audit and the conduct of activities is totally auditable.

Protection of Confidential Information

No director, senior management and employee shall disclose or use any confidential information gained in the course of employment/ association with the Company for personal gain or for the advantage of any other person. No information either formally or informally shall be provided to the press, other publicity media or any other external agency except within approved policies.