

VVDN Core Values and Business Standard

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The Right Way At VVDN

In the competitive service environment in which we operate, it is imperative that we maintain the highest standards of integrity. Our reputation and our success depend on it. Whether we're working in a development center, on-site with our customers, in our corporate office or elsewhere, we must be role models of integrity and ensure that we handle our clients' systems, confidential information or sensitive intellectual property, as well as our own, with the utmost of care. VVDN's core values define the behavior that makes us successful in the market. They constitute a framework which reflects of how we do our work and ensures consistent professional conduct across diverse culture and work environment.

VVDN Core Values

Solve For The Customer

VVDN's concept of customer orientation goes beyond just doing the business. It's absolutely crucial that we listen and respond to those who depend on us; our customers, suppliers, and stakeholders. We clearly communicate mutual intentions and expectations; deliver innovative and competitive products and services; make it easy to work with us; and strive to be a vendor of choice.

Collaborate, Inspire, Create

We are total believers in **Doing Great Things** together. Our commitment to collaboration is evident in our team-based project structure. There are no individual star performers in VVDN. Instead; we predicate the growth of individuals on their contributions to the team's success in delivering exceptional customer experiences. Togetherness leads to inspiring and creative ideas which lay the foundation of innovation.

Share Openly and Transparently

We have an open door and open mind environment. VVDN encourage every individual to come forward with ideas that are aimed at providing excellence. Our communications are always proactive, direct and honest. This openness and transparency is critical to the health of our company. We practice this same transparency with our clients. We understand that bringing forward bad news early allows us to be proactive and able to address an issue before it turns into a crisis.

Favor autonomy and taking ownership

We don't have pages of policies and procedures. We follow a 3 word policy: Use Good Judgment. VVDN's cheat sheet is Customer>Team>Individual. We strive to being a true

“ownership culture” where every employee feels a substantial, personal stake in the company’s performance. It creates a situation in which behavior is guided more by values than by rules; even when “nobody is watching,” people treat each decision as if they were, in fact, the owner.

Unyielding Passion and Integrity

Integrity is one virtue that holds every individual/company. VVDN believes that doing work with honesty results in greater efficiency. Being true to oneself and your customer, paves the way for greater future. Our promise is our most vital product – our word is our bond. The relationships that are critical to our success depend entirely on maintaining the highest ethical and moral standards around the world. Remember we are what our company is.

Business Standards

We are Guided by Our Standards

These Standards of Business Conduct (Standards) explain how our Values are infused throughout our work for VVDN. They provide a shared understanding not just about what we do, but also how we do it. They are a framework for ensuring consistent professional conduct across diverse cultures and work environments worldwide.

Our Standards apply to all associates, officers and members of the Board of Directors of VVDN Technologies and its direct and indirect subsidiaries, and other businesses controlled by VVDN worldwide. Such entities are collectively referred to herein as “VVDN” or the “Company” and such persons to which these Standards apply are referred to as “VVDN Associates.” The term “VVDN Associates” also refers to our contractors, subcontractors, suppliers, and others who assist us in servicing our clients or otherwise conducting our business.

As a global business, VVDN is committed to complying with the laws of the countries in which we operate. We make this pledge not just because it’s the right thing to do, but also because it’s an integral part of our commitment to excellence and exceeding client expectations, as well as our dedication to being a good corporate citizen and improving our communities.

Managers’ Additional Responsibilities

All of us are responsible for maintaining a standard of excellence at VVDN. For those of us in positions of leadership, that means having additional duties fostering ethics and integrity. If you are a manager, you are expected to help Associates resolve ethical issues. It is up to you to create an atmosphere where Associates feel comfortable coming to you to discuss questions and possible violations. As a manager, never retaliate or tolerate retaliation against any individual for making a good-faith report. If you receive a report of misconduct, you are responsible for immediately informing the HR manager. Any manager who directs or approves of any conduct in violation of these Standards, or who has knowledge of such conduct and does not immediately report it, will also be subject to disciplinary action.

Getting Help or Reporting a Possible Violation

As VVDN Associates, we have a responsibility to ask questions, seek guidance, and express concerns about our Standards. These Standards and our Company policies (located on our Intranet) exist to give context to the ethical behavior expected from us, guide us in making a report, and direct us to various sources with whom we may ask questions. As part of our commitment to our stakeholders, we are also expected to cooperate fully with any investigation into any actual or potential violation. To report a real or suspected violation of these Standards, the following individuals and resources are available to you:

- Your manager
- HR manager
- Email: xm@vvdntech.com

Our Ethics Earn Trust

At VVDN, we continually strive to be a trusted advisor. In pursuing this goal, we must consistently incorporate the following standards into our day-to-day business activities.

Giving Gifts

In general no Gifts shall be offered to any customers, vendors, Government Officials etc. Exceptions:

- Customary Gifts of value lower than or equal to the Acceptable Limit.
- Business lunch (or breakfast or dinner) of a reasonable value may be provided to customers, visitors and business contacts/ associates.

Relationship with the Government Officials

Extra care and caution needs to be taken when dealing with Government Officials. No Gifts or other benefits including Entertainment shall be offered to Government Officials which could be considered as influencing any business decision or to obtain improper advantage.

Exceptions:

- Provision of local conveyance to the Government Officials while they are visiting our campus for any inspection/ audit. However, this would require prior approval of your immediate Supervisor.
- Business lunch: Same rules as applicable to visitors and business contacts.

Associates are required to report correctly in their expense reports, all expenses for any Gifts given or Entertainment provided as part of any normal and acceptable business practice in the course of their employment, and must accurately state the purpose for the expenditure.

Employment of Relatives

Members of an employee's immediate family may be considered for employment on the basis of their qualifications. Immediate family members may be hired, if such employment would:

- Not create a direct supervisor/subordinate relationship with a family member.

The purpose of this policy is to prevent the organizational impairment and conflicts that are a likely outcome of the employment of relatives or significant others, especially in a supervisor/subordinate relationship. Willful withholding of information regarding a prohibited relationship/reporting arrangement may be subject to corrective action, up to disciplinary action including termination.

Outside Employment

A policy on outside employment is deemed necessary to prevent conflicts of interest, consistent with applicable state law. Therefore, every employee of VVDN shall not work for either a competitor or supplier of VVDN. Employees shall not engage in any outside employment, including any self employment or independent contracting activities that might conflict with scheduled hours, overtime hours (when required), or the proper performance of their job functions for VVDN, including emergency work, or otherwise restrict employees to respond to the needs of VVDN or its clients. In no event shall any employee actively engage in self employment or independent contracting activities in competition with VVDN.

Intellectual Property Rights

All employees have an utmost obligation to themselves to identify and protect the intellectual properties, trade secrets and other confidential information owned by VVDN and its customers or associates because it is critical to our success.

By Intellectual Property Rights (“IPR”) it means generally patented or potentially patentable inventions, trademarks, service marks, trade names, copyrightable subject matter, and trade secrets. All employees must be aware of and comply with VVDN’s procedures necessary to safeguard these assets, including complying with any agreement relating to intellectual property and confidentiality signed upon the commencement of or during employment.

All employees are responsible for complying with the requirements of software copyright licenses related to software packages used in fulfilling job requirements. In addition to protecting VVDN’s own intellectual property rights, VVDN respects the valid intellectual property rights of others. Employees must use proprietary material of others only under valid license and only in accordance with the terms of such a license.

Unauthorized receipt or use of the intellectual property of others may expose VVDN to civil law suits and damages. Employees are advised to follow all VVDN procedures, including those

governing the appropriate handling of unsolicited intellectual property. Employees shall not use copyrighted materials without appropriate permission. All employees sign NDA agreement with company for complying with VVDN's IPR protection.

Employees are advised to refer detailed VVDN Intellectual Property Rights policy as issued by the HR from time to time.

Creating Effective Records

Our reputation as a trusted advisor is built by the confidence others have in us. This is, in part, based on the accuracy of the written records and verbal statements we produce. By providing full, fair, accurate, timely, and understandable disclosures, we generate trust with our stockholders. Failing to accurately record financial information severely damages our name, exposes us to legal liability, and harms the trust our customers and stockholders place in us.

As VVDN Associates, we are responsible for the accuracy of the books and records we maintain in the course of our jobs. These include:

- Financial records
- Travel and expense reports
- Forecasts, resource allocations, and billings
- Financial statements

In addition, we must ensure that all Company books, records, accounts, and financial statements:

- Are maintained in accordance with all applicable regulations and standards
- Accurately reflect the true nature of the transactions they record
- Conform to generally accepted accounting practices (GAAP) and Company accounting policies

Anti-Harassment

VVDN perceives harassment as a form of discrimination that is offensive, undermines the integrity of employment relationships and causes serious harm to the productivity, efficiency and stability of the organisation. Harassment may include (but is not limited to) making unwelcome sexual advances, sending or displaying obscene or racist materials, or sending or telling offensive jokes or comments, verbally or otherwise. Harassment can be verbal, physical

or visual behavior where the purpose or effect is to create an offensive, hostile or intimidating environment.

VVDN endeavors to ensure a congenial environment where employees can work without any inhibition and contribute their best without fear or favor. Any employee who engages in such prohibited conduct will be subject to disciplinary action. Employees shall refrain from taking discriminatory actions.

Employees may refer for further details and grievance address procedure followed by Anti Sexual Harassment Committee in the intranet.

Drugs and Alcohol

Any employee, who is found to be under the influence of or using, or possessing illegal drugs on VVDN or customer premises or while conducting VVDN's business, is subject to disciplinary action, including possible termination. While conducting VVDN's business, employees are advised not to be under the influence of alcohol or other similar substances or improperly use medication in any way that could diminish — or raise questions concerning — ability to perform their job or result in their doing things that might be harmful to VVDN.

Communication about VVDN

VVDN has a responsibility to disclose information to the public that is completely accurate. Because VVDN is committed to delivering proper and reliable information to the public, we must not speak on behalf of our Company, our competitors, or our industry with any member of the media or investment community (including all "market professionals") unless we are designated to do so.

Any disclosure of forecasts, press releases, speeches and other communications is to be approved by President, Sales and Marketing. If you are approached by any media person, analyst, or investor please direct those queries to the Communications Group. Do not attempt to provide any information yourself. Please ask the person approaching you to send an email to: marketing@vvdntech.com, and the Communications Group will respond appropriately.

General

Waivers

Any waiver of any provision of this COBCE with respect to any other employee, agent or contractor must be approved in writing by VVDN's management.

Complaints

Anonymous complaints: This policy encourages an employee to put his/her name to any disclosures he/she makes. Any malpractice, impropriety, abuse and wrongdoing (hereinafter referred to as "Concern") expressed anonymously are much less credible, but they may be considered for further action at the sole discretion of VVDN.

Good faith complaints: Every employee has a duty to read and understand the policies, raise queries and report any violation of policies. If an employee makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that employee. In raising the Concern the employee shall exercise due care to ensure the accuracy of the information.

Maintaining confidentiality of the Concern: The employee making the disclosure of Concern as well as any of the persons to whom the Concern has been disclosed or any of the persons who will be investigating or deciding on the investigation, shall not make public the Concern disclosed except with the prior written permission of the Audit Committee. However, this restriction shall not be applicable if any employee is called upon to disclose this issue by any judicial process and in accordance with the laws of land.

Disciplinary actions: VVDN will take appropriate disciplinary action against any employee, agent, contractor or consultant whose actions are found to violate these policies or any other policies of VVDN. Disciplinary actions may include immediate termination of employment or business relationship at VVDN's sole discretion. Where VVDN has suffered a loss, it may pursue remedies available to it in law, against the individuals or entities responsible. Where laws have been violated, VVDN will cooperate fully with the appropriate authorities.

Retaliatory acts: It is a violation of the policy to engage in retaliatory acts against any employee who reports an incident of alleged harassment including sexual harassment, or any employee who testifies, assists or participates in a proceeding, investigation or hearing relating to such allegation of harassment. Employees who believe they have been retaliated against because of testifying, assisting or participating in proceeding, investigation, or hearing relating to an allegation of harassment, shall meet with and seek the advice of the management, whose responsibilities include handling retaliation. If an employee believes that he/she has been

retaliated against in the form of an adverse personnel action for disclosing the Concern under the policy he/she may file a written Concern to the management requesting an appropriate remedy. For the purposes of this policy an adverse personnel action shall include a disciplinary suspension; a decision not to promote; a decision not to grant a salary increase; a decision not to hire; a termination; an involuntary demotion; rejection during probation; a performance evaluation in which the employee's performance is generally evaluated as unsatisfactory; an involuntary resignation; an involuntary retirement; an involuntary reassignment to a position with demonstrably less responsibility or status as compared to the one held prior to the reassignment; or an unfavorable change in the general terms and conditions of employment.

Accountability: Management shall oversee VVDN's adherence to ethical and legal standards. All employees including the finance people and the members of the Board of Directors shall undertake to stop or prevent actions that could harm customers, the system or reputation of VVDN and to report such actions as soon as they occur.