



# **PROMOTING FAIR COMPETITION AND ANTITRUST COMPLIANCE**



**V.K.A. Polymers Private Limited  
9/939 Chinna Andan Kovil Street,  
Karur-639002  
Tamil Nadu, India.**

**Document No: HR-POLICY-2021-03FCB**

**Issue Date: 10 March 2021**

## **Policy Statement:**

V.K.A. Polymers Pvt. Ltd. is committed to promoting fair competition and complying with antitrust laws. This policy ensures compliance, encourages a competitive market, and upholds our business integrity. It outlines the principles for employees, contractors, and agents to follow.

## **Scope:**

This policy applies to all individuals associated with V.K.A. Polymers Pvt. Ltd., including employees, contractors, consultants, agents, and any other representative acting on behalf of the organization.

### **1. Compliance with Applicable Laws:**

- a. Any conduct that breaches the rules of competition is forbidden by V.K.A. Polymers Private Limited. This includes, but is not limited to, agreements, arrangements, or practises that might limit competition, divide up markets, fix prices, or engage in anti-competitive behaviour.
- b. All workers are required to become aware with and uphold all applicable competition and antitrust laws that are pertinent to their job duties.

### **2. Prohibition of Anti-Competitive Conduct:**

- a. Any behaviour that unduly inhibits competition or threatens free and fair market competition is expressly forbidden by V.K.A. Polymers Private Limited.
- b. Workers are not permitted to engage in collusive behaviour, bid-rigging, price-fixing, market allocation, or any other actions that can improperly manipulate or stifle competition.

### **3. Avoidance of Conflicts of Interest:**

- a. Employees must avoid conflicts of interest that could compromise fair competition or give rise to potential antitrust violations.
- b. Employees must not engage in discussions or agreements with competitors that could lead to anti-competitive behaviour or result in unfair advantages in the market.

#### **4. Training and Awareness:**

- a. To ensure that staff members are aware of their responsibilities and potential dangers, V.K.A. Polymers private limited will conduct frequent training sessions and give resources.
- b. Concerns or questions about possible antitrust violations should be brought up to the appropriate compliance officer or department.

#### **5. Reporting Violations:**

- a. Any employee who learns of a possible violation of the antitrust or competition legislation must notify the appropriate compliance officer or department right away.
- b. V.K.A. Polymers Private Limited should safeguard whistle-blowers from retribution and shall swiftly and thoroughly investigate alleged violations.

#### **6. Cooperation with Authorities:**

- a. In the event of any investigations or enquiries about competition or antitrust issues, V.K.A. Polymers Private Limited will fully cooperate with competition authorities and regulators.
- b. When responding to queries from authorities, employees should be truthful and accurate.

#### **7. Consequences of Non-Compliance:**

- a. Punitive actions, such as warnings, suspensions, terminations, and legal repercussions, may be taken in response to violations of this policy or applicable competition and antitrust laws.
- b. V.K.A. Polymers Private Limited reserves the right to resolve infractions and lessen any potential harm to the organisation by taking appropriate measures.

#### **8. Policy review**

- a. This policy will be periodically reviewed to ensure its alignment with evolving laws, regulations, and best practices related to competition and antitrust.
- b. Updates and revisions to the policy will be communicated to all employees to ensure ongoing compliance.

**10 Mar 2021**

**Managing Director**