



TRADE SANCTIONS AND REGULATORY ACTIONS POLICY



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

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Policy Statement:

V.K.A. Polymers Private Limited is fully committed to complying with trade sanctions and legislative requirements set by domestic and foreign agencies. This policy outlines the necessary rules and procedures for all personnel, partners, and stakeholders to follow, ensuring strict adherence to applicable trade restrictions and legal obligations. Compliance with trade sanctions and regulatory measures is vital to maintaining our business integrity and upholding legal and ethical standards.

Scope:

This policy is applicable to all V.K.A. Polymers Private Limited employees, contractors, and stakeholders, including but not limited to directors, officers, managers, personnel, and anyone else acting on the company's behalf.

1. Awareness and Education:

- a. A regular training and awareness programme will be offered by V.K.A. Polymers Private Limited to all staff to ensure that they are aware of the relevant trade sanctions and regulatory measures.
- a. Employees are expected to become familiar with and keep up of all applicable laws, rules, and trade sanction policies that control our sector and the regions in which we operate.

2. Prohibited Transactions:

- a. Any person connected to V.K.A. Polymers Private Limited is expressly forbidden from taking part in any transaction or business activity that breaches trade restrictions or legal requirements.
- b. According to the appropriate authorities, employees are not allowed to conduct any trade, financial transactions, or business relationships with people, groups, or nations that are subject to trade sanctions or other regulatory measures.
- c. Employees must also avoid participating in or enabling any transaction that would violate trade restrictions or legal requirements.

3. Due Diligence and Screening:

- a. V.K.A. Polymers Private Limited will put in place strict due diligence procedures to check potential business partners, suppliers, clients, and other relevant entities against lists of blacklisted people, groups, or nations.
- b. To ensure compliance with trade sanctions and regulatory measures, employees involved in supply chain management, commercial partnerships, and procurement must execute the necessary background checks and thorough screenings.

4. Reporting and Internal Communication:

- a. Employees are required to notify the designated compliance officer on compliance@vkapolymers.com or department as soon as they become aware of any potential infractions or suspicious behaviour relating to trade sanctions or regulatory actions.
- b. To facilitate the expression of concerns without fear of retaliation, confidential reporting methods shall be made available.
- c. In line with relevant rules and regulations, the compliance officer or department will look into any reported problems.

5. Consequences of Non-Compliance:

- a. A violation of this policy may result in disciplinary action, up to and including the termination of employment or contractual obligations, including knowing or careless violations of trade sanctions or regulatory actions.
- b. In addition, non-compliance could subject V.K.A. Polymers Private Limited to negative legal repercussions, harm to its reputation, financial penalties, and lost commercial prospects.

6. Policy Review:

- a. This policy will be reviewed and modified on a regular basis to account for any modifications to trade restrictions, regulatory measures, or legal requirements.
- b. Employees will be informed of any changes to the policy and will receive any appropriate training to maintain compliance.

10 Mar 2022

Managing Director