

# **Code of Business Conducts and Ethics**

## **Introduction**

This Code of Business Conduct and Ethics helps ensure compliance with legal requirements and our standards of business conduct. Directors and Company employees are expected to read and understand this Code of Business Conduct and Ethics, uphold these standards in day to day activities, comply with all applicable policies and procedures, and ensure that all agents and contractors are aware of, understand and adhere to these standards.

We are committed to continuously reviewing and updating our policies and procedures. Therefore this Code of Business Conduct and Ethics is subject to modification. This Code of Business conduct and Ethics supercedes all other such codes, policies, procedures, instructions, practices, rules or written or verbal representations to the extent they are inconsistent.

## **National Interest**

IVP Company shall conduct its business affairs in accordance with the economic development and foreign policies, objectives and priorities of the nation's government, and shall strive to make a positive contribution to the achievement of such goals at the international, national and regional level, as appropriate.

## **Financial reporting and records**

IVP shall prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which the company conducts its business affairs. All required information shall be accessible to company auditors and other authorized parties and government agencies. There shall be no willful omissions of any company transactions from the books and records.

## **Gifts and donations**

IVP Directors and its employees shall neither receive nor offer or make directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits which are intended to or perceived to obtain business or uncompetitive favors for the conduct of its business.

## **Government Agencies**

IVP Directors and its employees shall not offer or give any company funds or property as donation to any government agencies or their representatives directly or through intermediaries, in order to obtain any favorable performance of official duties.

## **Health, safety and environment**

IVP shall strive to provide a safe and healthy working environment and comply in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territory it operates in.

## **Corporate citizenship**

IVP shall be committed to be a good corporate citizen , not only in compliance with all relevant laws and regulations, but also by actively assisting in the improvement of the quality of life of the people in the communities in which it operates , with the objective of making them self reliant.

## **Ethical conduct**

Every Director and employee of IVP , which shall include whole-time directors and the managing director , shall deal on behalf of the company with professionalism, honesty and integrity, as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be as such by third parties.

## **Regulatory compliance**

Every Director and employee of IVP shall , in his or her business conduct, comply with all applicable laws and regulations, both in letter and in spirit , in all the territories in which he or she operates. If the ethical and professional standards set out in the applicable laws and regulations are below that of the code, then the standards of the code shall prevail.

## **Conflict of interest**

Any Director or employee of IVP shall not engage in any business ,relationships or activity which might detrimentally conflict with the interest of his company or the group. A conflict of interest , actual or potential , may arise where, directly or indirectly. a) He or she engages in a business, relationships or activity with anyone who is party to a transaction with his or her company: b) He or she is in a position to derive a personal benefit or a benefit to any of his or her relatives by making or influencing decisions relating to any transaction: c) An independent judgment of the company's or group's best interest cannot be exercised.

## **Securities transactions and confidential information**

Any Director or employee of IVP and his or her immediate family shall not derive any benefit or assist others to derive any benefit from the access to and possession of information about the company or the group, which is not in the public domain and this constitutes insider information. Such insider information might include the following: - Acquisition and

divestiture of business or business units - Financial information such as profits , earnings and dividends - Announcement of new product introductions or developments - Asset revaluations - Investment decisions/plans - Restructuring plans - Major supply and delivery agreements - Raising finances

### **Protecting company assets**

The assets of IVP should not be misused but employed for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials, resources as well as intangible assets such as proprietary information, relationships with customers and suppliers etc.

### **Citizenship**

A director or an employee of IVP shall in his or her private life be free to pursue an active role in civic or political affairs as long as it does not adversely affect the business or interests of the company or the group.

### **Reporting concerns**

Every Director and employees of IVP shall promptly report to the management any actual or possible violation of this code, or an event he or she becomes aware of that could affect the business or reputation of his/her or any other IVP Company.