



ANAND NVH – EMPLOYEE, CODE OF CONDUCT

Anand NVH Products Pvt Limited

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Contact for Queries	hr@anandnvh.com

1. MESSAGE FROM THE "EXECUTIVE DIRECTOR"

At Anand NVH Products Pvt. Ltd., integrity has always been the foundation of our success. Our vision is to grow responsibly, deliver excellence to our customers, respect the people we work with, and protect the planet we depend upon.

This Internal Code of Conduct defines the standards that guide every decision and action we take. It brings together our long-standing commitment to ethical business, fair treatment of employees, safe workplaces, human-rights protection, environmental stewardship, and compliance with laws and international best practices.

Each of us represents Anand NVH. Whether in our plants, offices, or supplier locations, our conduct defines who we are. Read this Code carefully, discuss it with your manager, and speak up if you see behaviour that does not match our values.

Together we will continue to build a company admired for both its performance and its principles.



Kanwardeep Singh Anand

Executive Director

Anand NVH Products Pvt. Ltd

2. Purpose and Scope

2.1 Purpose

This Code establishes the ethical, legal and professional behaviour expected from everyone working for or representing Anand NVH. It ensures that our daily actions reflect our corporate values and comply with applicable national laws and international standards including the UN Global Compact Principles, ILO Core Conventions, ISO 26000 Social Responsibility Guidelines, Responsible Business Alliance (RBA) Code, OECD Guidelines for Multinational Enterprises and the GRI Standards.

2.2 Scope

The Code applies to:

- All employees (permanent, contract, temporary, trainees, apprentices and part-time).
- Directors, officers and senior management.
- Contract labour, consultants, agents and any third parties representing Anand NVH.
- All sites, offices, projects and operations controlled by the company.

It complements existing policies, manuals and procedures including but not limited to the:

- Anti-Corruption Manual,
- Fair Competition Compliance Manual,
- Health & Safety Policy,
- Working Conditions Policy,
- Human Rights Policy,
- Discrimination & Harassment Policy,
- Career Management and Training Policy, and
- Supplier Sustainability Code of Conduct.

Where this Code and another company policy differ, the stricter requirement applies.

3. Our Values and Ethical Principles

Anand NVH's values are the compass for everything we do:

Core Value	What It Means in Practice
Integrity	We act honestly, follow laws, and keep our commitments even when no one is watching.
Respect	We treat everyone with dignity, fairness and empathy, embracing diversity and inclusion.
Accountability	We own our actions, decisions and their consequences.
Excellence	We pursue the highest standards in quality, safety and innovation.
Sustainability	We protect the environment and support the wellbeing of communities around us.
Transparency	We communicate openly and build trust through honesty and reliability.

My Contribution: I will demonstrate these values in my daily decisions, challenge unethical conduct, and seek guidance whenever in doubt.

4. Responsibilities under This Code

4.1 All Employees Must

- Read, understand and comply with the Code and supporting policies.
- Uphold company values and legal obligations in all activities.
- Complete required ethics, compliance and safety trainings.
- Protect company property, confidential data and reputation.
- Report suspected violations promptly to hr@anandnvh.com or any manager.

4.2 Supervisors and Managers Must

- Lead by example and reinforce ethical behaviour.
- Ensure their teams understand and apply the Code.
- Encourage open discussion of dilemmas and concerns.
- Escalate reported issues immediately to HR or Compliance.

4.3 Special Roles

- **Compliance Officer:** Maintains the Code, delivers training, investigates violations, tracks corrective actions.
- **Human Resources:** Integrates Code compliance into hiring, appraisal and disciplinary processes.
- **EHS Department:** Ensures health, safety and environmental obligations are implemented.
- **Internal Audit:** Monitors adherence through periodic reviews.
- **Top Management:** Provides resources, oversight and visible commitment to ethical conduct.

5. Legal and Regulatory Compliance

All employees must follow applicable laws, regulations and contractual obligations wherever Anand NVH operates. Ignorance of the law is not an excuse.

5.1 Key Indian Legal Frameworks Reflected in This Code

- Factories Act / OSH Code 2020: Occupational safety and working conditions.
- Code on Wages 2019 / Industrial Relations Code 2020: Fair pay, working hours, freedom of association.
- Prevention of Corruption Act 1988: Anti-bribery provisions.
- POSH Act 2013: Prevention of sexual harassment at workplace.
- Child Labour (Prohibition and Regulation) Act 1986: No child labour.
- Information Technology Act 2000 / Digital Personal Data Protection Act 2023: Data privacy and cybersecurity.
- Companies Act 2013: Corporate governance, whistleblower protection and CSR.

5.2 International Commitments

Anand NVH voluntarily aligns with the UN Global Compact Principles 1–10, the ILO Conventions, ISO 26000 guidelines, and the RBA Code of Conduct. Compliance with these standards demonstrates our dedication to responsible business conduct and sustainable development.

6. Purpose of Adherence and Consequences of Violation

Following this Code protects both the company and each employee. Violations can lead to disciplinary action up to and including termination of employment, civil or criminal penalties, and reputational harm.

When unsure about a situation:

1. Stop and consider if the action aligns with our values.
2. Check the relevant policy or seek guidance from Compliance or HR.
3. If you still doubt its appropriateness, do not proceed until you receive clear advice.

7. Employment, Equal Opportunity & Fair Treatment

7.1 Commitment

Anand NVH is committed to a workplace that is fair, inclusive, and free from discrimination or harassment of any kind. Employment decisions are based solely on merit, performance, and business needs.

7.2 Equal Opportunity

- Recruitment, training, promotion, compensation, and termination are conducted without bias relating to gender, age, caste, religion, marital status, disability, nationality, sexual orientation, or any other legally protected characteristic.
- Diversity and inclusion are core to our leadership and workforce development objectives.

7.3 Anti-Harassment and Dignity at Work

- Any form of harassment—verbal, physical, visual, or digital—is prohibited.
- The company enforces a zero-tolerance stance on sexual harassment under the Prevention of Sexual Harassment (POSH) Act, 2013.
- An Internal Complaints Committee (ICC) is established at each site; all complaints will be handled sensitively and confidentially.

7.4 Fair Employment Practices

- We uphold voluntary employment; no employee shall work under threat or coercion.
- Terms of employment are documented and clearly communicated.
- Working hours, rest days, and overtime pay comply with statutory requirements.

My Contribution: I will treat colleagues with respect, ensure fairness in all interactions, and raise concerns if I witness discrimination or bullying.

8. Human Rights and Labour Standards

8.1 Our Commitment

Anand NVH respects internationally recognised human rights and ensures their protection across its operations and value chain in accordance with the UN Guiding Principles on Business and Human Rights and ILO Core Conventions.

8.2 Core Principles

1. **Freedom of Association:** Employees may form or join lawful associations or unions without fear of retaliation.
2. **No Child Labour:** Employment below the legal minimum age is strictly prohibited; robust age-verification systems are implemented.
3. **No Forced or Bonded Labour:** All work is voluntary; employees retain control of their identity documents and freedom of movement.
4. **No Discrimination:** Equal rights and treatment are maintained at all times.
5. **Right to Fair Wages and Working Conditions:** Compliance with national wage laws and commitment to progressive implementation of living wages.
6. **Respect for Indigenous and Vulnerable Groups:** Where our operations affect local communities, we ensure Free, Prior and Informed Consent (FPIC) and equitable treatment.

8.3 Human-Rights Due Diligence

- Identify and assess potential human-rights risks before significant projects or supplier engagements.
- Conduct periodic impact assessments and report findings to senior management.
- Integrate mitigation plans and continuous monitoring through internal audits and supplier reviews.

9. Working Conditions and Employee Wellbeing

Aligned with the ANP Working Conditions Policy v2.0, Anand NVH ensures decent, safe, and dignified work for all.

9.1 Compensation and Benefits

- 100 % compliance with statutory minimum wage and benefits.
- Equal pay for work of equal value.
- Transparent pay structure and timely payments via authorised channels.
- Annual compensation review aligned with market benchmarks.

9.2 Working Time and Rest

- Standard workweek shall not exceed 48 hours; overtime is voluntary and compensated as per applicable norms.
- Minimum one day off per week and adequate rest breaks during shifts.
- Flexible working hours and remote work options are provided based on the situation's urgency and job requirements, subject to management approval.

9.3 Employee Engagement and Growth

- Continuous training and career-development opportunities provided as per the Career Management and Training Policy.
- Regular employee-engagement surveys, suggestion systems, and recognition programmes implemented.

9.4 Grievance and Employee Voice

- Multi-channel grievance mechanism: direct manager, HR, Compliance, anonymous boxes, or union representation.
- Complaints acknowledged within 48 hours and resolved within defined timelines.
- No retaliation against any employee who raises a concern in good faith.

9.5 Diversity and Inclusion Targets

- The organization will strengthen the representation of women in leadership roles, fostering a culture of gender-balanced decision-making and inclusive growth.
- The organization will ensure fair and equitable pay practices, promoting a workplace where compensation is based solely on merit, capability, and performance.
- The organization will promote disability inclusion by creating an accessible, supportive, and empowering environment for employees with disabilities.
- The organization will maintain a workplace free from discrimination and harassment, reinforcing a culture of respect, dignity, and equal opportunity for all.

10. Health, Safety & Environment (HSE)

10.1 Policy Statement

Anand NVH is committed to a Zero Harm culture ensuring the health, safety and wellbeing of all employees, contractors, and visitors while minimising environmental impact. This commitment aligns with ISO 45001 and ISO 14001 principles.

10.2 Leadership and Responsibilities

- The Managing Director and senior management provide resources, training, and oversight for effective HSE implementation.
- Each site maintains a Joint HSE Committee with equal representation from management and workers.
- Supervisors are responsible for day-to-day HSE compliance and incident reporting.

10.3 Occupational Health & Safety Standards

- Identify, evaluate and control workplace hazards through risk assessments and safe-work procedures.
- Provide and enforce use of appropriate Personal Protective Equipment (PPE).
- Maintain emergency preparedness, evacuation plans, fire safety systems, and first-aid facilities.
- Prohibit alcohol or substance abuse at the workplace.
- Report and investigate all incidents, near-misses and unsafe acts promptly.

10.4 Health & Wellbeing

- Annual medical examinations and preventive healthcare programmes for all employees.
- Mental-health counselling and stress-management support available.
- Clean drinking water, sanitation, dining, and rest facilities maintained at all sites.

10.5 Environmental Protection

- Prevent pollution and comply with applicable environmental laws and permits.
- Manage waste responsibly: reduce, reuse, recycle.
- Conserve energy and water; monitor greenhouse-gas emissions and strive for continuous reduction.
- Promote green procurement and sustainable packaging.

10.6 Crisis Management & Business Continuity

- Comprehensive emergency-response plans in place for fire, explosion, natural disaster, pandemic, or industrial accidents.
- Regular drills, training and review of response effectiveness.
- Ensure employee support and transparent communication during crises.

10.7 Continuous Improvement

- Conduct regular HSE audits and performance reviews.
- Implement Corrective and Preventive Actions (CAPA) for all incidents and audit findings.
- Use data and feedback to enhance safety culture and environmental performance.

My Contribution: I will follow all safety rules, wear PPE, stop unsafe work, report hazards immediately, and support initiatives that reduce environmental impact.

11. Fair Competition and Antitrust Compliance

11.1 Commitment

Anand NVH conducts business with integrity and in full compliance with applicable competition and antitrust laws. We believe in winning business through quality, innovation, and customer trust — never through unfair or unlawful practices.

11.2 Key Principles

- Do not engage in price-fixing, bid-rigging, or collusion with competitors.
- Avoid discussions or exchanges of confidential business information with competitors (pricing, markets, strategy, production volumes, or suppliers).
- Do not divide or allocate customers, markets, or territories.
- Marketing and advertising must be truthful, accurate, and not misleading.
- Obtain competitive intelligence only through legitimate and ethical means.

11.3 Practical Guidance

If you attend industry meetings, conferences, or associations:

- Do not discuss sensitive topics such as pricing, costs, margins, or sales strategies.
- Leave any meeting where anticompetitive discussions begin and immediately report it to hr@anandnvh.com.

My Contribution: I will compete fairly, never misuse confidential information, and report any conduct that may restrict fair trade.

12. Anti-Corruption and Bribery Prevention

12.1 Policy Statement

Anand NVH enforces a zero-tolerance approach to corruption in all its forms — bribery, facilitation payments, kickbacks, embezzlement, and influence peddling. No employee, contractor, or third party may offer, give, solicit, or accept anything of value to obtain or retain business advantage.

12.2 What Constitutes a Bribe

A bribe is anything of value offered to improperly influence a decision — cash, gifts, hospitality, travel, employment, donations, discounts, or favours. Even if small or customary, such acts are prohibited when intended to influence behaviour or secure advantage.

12.3 Facilitation Payments

Small, unofficial payments to secure routine governmental actions (e.g., permits, customs clearance) are prohibited, regardless of local practice.

12.4 Third Parties

- Conduct due diligence before engaging agents, consultants, distributors, or intermediaries.
- Ensure anti-corruption clauses and audit rights are included in contracts.
- Monitor third-party payments, invoices, and relationships for red flags.

12.5 Gifts, Hospitality, and Entertainment

- Modest gifts or hospitality that are customary and not intended to influence may be acceptable.
- Anand NVH adheres to a strict "No Gift" policy to maintain transparency and uphold ethical business practices.
- Never offer gifts during active bidding, tendering, or contract renewal.

12.6 Political Contributions and Charitable Donations

- Anand NVH does not make political donations or contributions to political parties, candidates, or campaigns.
- Charitable donations and sponsorships must be transparent, approved by top management, and never used to disguise bribery.

12.7 Reporting Obligations

If you suspect bribery, fraud, or any unethical transaction:

- Report immediately to your manager, HR, or hr@anandnvh.com.
- Provide as much detail as possible; all reports will remain confidential and protected from retaliation.

13. Anti-Money Laundering (AML) and Financial Crime Prevention

13.1 Our Commitment

Anand NVH complies with all applicable anti-money laundering laws and takes measures to prevent its operations from being misused for money laundering, terrorist financing, or other financial crimes.

13.2 Employee Responsibilities

- Conduct business only with legitimate customers and suppliers.
- Verify counterparties' identities, beneficial ownership, and background before transactions.
- Avoid accepting or making cash payments beyond legally permitted limits.
- Monitor for unusual financial transactions, such as:
 - Payments through unrelated third parties.
 - Over/under-invoicing.
 - Multiple payments for the same invoice.
 - Payments to offshore accounts without clear justification.

13.3 Red Flags

- Counterparty unwilling to disclose ownership information.
- Requests to pay in cash or through intermediaries.
- Invoices that don't match goods or services delivered.
- Unexplained urgency or pressure to complete a transaction.

If you spot red flags, pause the transaction and report immediately to Finance and Compliance.

14. Conflict of Interest

14.1 Principle

Employees must avoid situations where personal interests conflict, or appear to conflict, with the company's best interests.

14.2 Common Examples

- Direct or indirect financial interest in a supplier, customer, or competitor.
- Outside employment or consulting with companies that do business with Anand NVH.
- Hiring or supervising close relatives.
- Using company assets or confidential information for personal gain.

14.3 Disclosure Requirement

- Employees must promptly disclose any actual or potential conflict of interest in writing to their Department Head and Compliance.
- Management will assess and document mitigation measures (e.g., recusal from decisions).

My Contribution:

I will disclose any personal interests that could affect my objectivity and act transparently in all business decisions.

15. Accounting, Books, and Records Integrity

15.1 Accurate and Transparent Records

- All business transactions must be accurately recorded in the company's books and supported by appropriate documentation.
- False, misleading, or incomplete entries are strictly prohibited.
- All expense reports, invoices, purchase orders, and approvals must reflect genuine transactions.

15.2 Internal Controls

- Follow established financial-control procedures for approvals, segregation of duties, and record retention.
- Do not create "off-the-book" accounts or unrecorded funds.
- Cooperate with audits and provide truthful, complete information.

15.3 Use of Company Assets

- Company assets (equipment, materials, funds, intellectual property) must be used only for legitimate business purposes.
- Any suspected theft, misuse, or damage of company assets should be reported immediately.

15.4 Insider Trading and Confidential Information

- Employees with access to material, non-public information (e.g., financial results, strategic plans, supplier pricing) must not trade or encourage others to trade in related securities.
- Never share confidential information externally unless authorised and necessary for legitimate business.

15.5 Export Controls and Sanctions Compliance

- Comply with all applicable trade laws, customs regulations, and export-control requirements.
- Do not engage in transactions with individuals or entities under government sanctions.
- Seek advice from Compliance before exporting technical data or products with potential dual-use applications.

16. Financial Responsibility and Tax Compliance

Anand NVH is committed to transparent, lawful, and responsible tax practices.

- All tax filings and payments are made accurately and on time.
- The company refrains from aggressive tax-avoidance schemes or artificial arrangements that lack commercial substance.
- Employees involved in financial reporting or tax matters must maintain high standards of professional integrity and confidentiality.

My Contribution:

I will ensure honesty in financial dealings, follow approval processes, and never manipulate data or conceal information.

17. Data Protection and Information Security

17.1 Our Commitment

Anand NVH protects personal and confidential information entrusted to it by employees, customers, suppliers, and other stakeholders. We collect and process data lawfully, fairly, and only for legitimate business purposes.

17.2 Personal Data Handling

- Collect the minimum data necessary and use it only for defined purposes.
- Store data securely using approved IT systems; restrict access on a need-to-know basis.
- Obtain consent where required and respect employee privacy rights.
- Follow defined retention and deletion schedules; destroy obsolete data securely.

17.3 Information Security Practices

- Keep passwords confidential and use strong authentication methods.
- Do not install unapproved software or connect unauthorised devices to company networks.

- Report any data breach or cybersecurity incident immediately to IT and Compliance.
- Protect confidential documents during remote work or travel.

17.4 Intellectual Property and Confidentiality

- Protect the company's patents, designs, trade secrets, and technical know-how.
- Use customer or supplier information strictly for agreed purposes.
- Do not share internal presentations, test data, or engineering drawings outside the company without authorisation.

My Contribution:

I will handle information responsibly, safeguard company and customer data, and promptly report any suspected breach.

18. Product Quality and Safety

18.1 Commitment to Quality

Anand NVH is dedicated to designing, manufacturing, and delivering products that meet customer expectations and all statutory, regulatory, and OEM requirements. Product quality and safety are non-negotiable.

18.2 Employee Responsibilities

- Follow approved work instructions, process controls, and testing procedures.
- Immediately stop production and inform a supervisor if you identify defects or potential safety issues.
- Record all quality-control data accurately; falsification of test results is a serious violation.
- Participate in quality-improvement initiatives and Kaizen programmes.

18.3 Product Compliance and Traceability

- Comply with all applicable material, chemical, and environmental regulations (REACH, RoHS, ELV if applicable).
- Maintain batch-level traceability and document retention as per Quality Management System requirements.
- Support product-recall or corrective-action efforts swiftly when required.

My Contribution:

I will uphold quality standards in every task and stop unsafe or non-conforming work without hesitation.

19. Community and Environmental Responsibility

19.1 Community Engagement

Anand NVH contributes positively to the communities where it operates through fair employment, volunteerism, and Corporate Social Responsibility (CSR) programmes in line with the *Companies Act 2013*.

Focus areas include:

- Education and vocational training,
- Health and sanitation,
- Environmental awareness and tree-plantation drives,
- Road-safety campaigns, and
- Skill development for youth and women.

19.2 Environmental Stewardship

- Integrate life-cycle thinking and resource efficiency in all operations.
- Strive to reduce greenhouse-gas emissions, energy, and water consumption annually.
- Promote waste segregation, recycling, and responsible disposal.
- Encourage suppliers to implement equivalent environmental standards.

19.3 Sustainable Procurement

- Preference to suppliers with verified environmental, social, and ethical performance.
- Apply due-diligence screening for high-risk materials and conflict minerals.
- Collaborate with suppliers to achieve continuous improvement in sustainability.

My Contribution:

I will support community and sustainability initiatives, use resources responsibly, and help minimise our environmental footprint.

20. Speak-Up, Whistleblowing and Non-Retaliation

20.1 Our Speak-Up Culture

Anand NVH encourages employees to voice concerns or report suspected violations of this Code, policies, laws, or ethical standards. Speaking up protects our integrity and helps resolve issues early.

20.2 Reporting Channels

- Email: hr@anandnvh.com
- Immediate Manager or HR Representative
- Anonymous Whistleblower Drop Boxes available at each site
- Direct approach to the Compliance Officer or Managing Director

Reports may be made anonymously; all will be handled confidentially.

20.3 Investigation Process

- Acknowledgement: within 7 days of receipt.
- Preliminary Review: within 15 days to determine scope and investigator.
- Detailed Investigation: normally completed within 45 days, with extensions only if approved by Compliance.
- Corrective Action: documented in the CAPA register and monitored until closure.
- All records maintained for a minimum of 5 years in the Whistleblower case log.

20.4 Protection from Retaliation

- Retaliation, victimisation, or intimidation of anyone who reports a concern in good faith is strictly prohibited.
- Disciplinary action (including termination) will be taken against anyone who engages in retaliation.

20.5 Confidentiality and Fair Treatment

- All investigations will be impartial, confidential, and respectful of the rights of all parties.
- Individuals accused of misconduct will be given an opportunity to respond before any decision is made.

20.6 False Reporting

Knowingly making false or malicious allegations is itself a serious offence and may lead to disciplinary action.

My Contribution:

I will speak up honestly and courageously when I see wrongdoing and will never retaliate against others who raise concerns.

21. Incident Reporting, Investigation and Corrective Action

21.1 Purpose

A structured and fair investigation process ensures that concerns raised under this Code are addressed promptly, transparently, and consistently.

21.2 Reporting an Incident

- Any employee who becomes aware of a potential violation of this Code, a policy, or law must report it immediately.
- Reports may be made via hr@anandnvh.com, line manager, HR, or anonymous drop box.
- Anonymous reports will be investigated based on available information.

21.3 Investigation Process

1. Acknowledgement: Compliance will confirm receipt within 7 days.
2. Assignment: A case number is created; an investigator or committee is appointed within 10 days.
3. Preliminary Review: Initial fact-finding, document review, and witness identification.
4. Detailed Investigation: Interviews, evidence collection, and analysis. Target completion within 45 days.
5. Findings Report: Submitted to Compliance Head and senior management for review.
6. Corrective and Preventive Action (CAPA): Implemented by relevant department; closure verified by Compliance.
7. Communication: Outcome (as appropriate) communicated to reporter and concerned parties..

21.4 Confidentiality and Fair Treatment

- All investigations are handled confidentially; disclosure limited to those with a need to know.
- The rights of both complainant and respondent are protected throughout the process.
- Any form of obstruction or interference with an investigation is a disciplinary offence.

21.5 Recordkeeping

All records (reports, findings, CAPA) are retained securely for minimum five years and reviewed periodically for systemic improvements.

22. Disciplinary Actions and Consequences

22.1 Principle

Misconduct or violation of this Code, company policies, or law will result in appropriate disciplinary action, proportionate to the severity and circumstances.

22.2 Types of Misconduct

- Fraud, bribery, corruption or theft.
- Falsification of records or data.
- Violation of HSE rules resulting in risk to life or environment.
- Harassment, discrimination, or bullying.
- Conflict of interest or unauthorised disclosure of information.
- Retaliation against whistleblowers.
- Repeated negligence or policy non-compliance.

22.3 Disciplinary Measures

Depending on severity, actions may include:

1. Counselling or written warning.
2. Suspension without pay.
3. Demotion or transfer.
4. Termination of employment.
5. Legal action or referral to law enforcement.

22.4 Appeals

Employees have the right to appeal disciplinary decisions to HR and Compliance within 15 working days of receiving the decision. Appeals are reviewed by an independent management panel.

22.5 Management Responsibility

Supervisors and HR must ensure disciplinary processes are fair, documented, and in line with company policy and labour laws.

23. Compliance Management System

23.1 Overview

Anand NVH maintains a structured Ethics and Compliance Management System to implement, monitor, and continually improve adherence to this Code and all related policies.

23.2 Key Elements

1. Policy Framework: Integrated set of ethics, human rights, HSE, and anti-corruption policies.
2. Risk Assessment: Periodic compliance and ESG risk mapping for operations and supply chain.
3. Training & Awareness: Annual training for all employees; targeted sessions for managers, procurement, finance, and production staff.
4. Monitoring & Audits: Internal audits, self-assessments, and third-party reviews to evaluate effectiveness.
5. Corrective Action: CAPA system for closing audit findings and Code violations.
6. Performance Indicators:
 - Training completion rate $\geq 95\%$.
 - Whistleblower cases resolved within timeline $\geq 90\%$.
 - Zero repeat HSE major incidents.
 - Supplier compliance rate $\geq 90\%$.
7. Reporting: Quarterly compliance reports to the Managing Director and annual presentation to the Board.

23.3 Integration with Supplier Management

- Suppliers are assessed through the Supplier Sustainability COC, audits, and self-assessments.
- Non-compliance triggers a CAPA or, in severe cases, business discontinuation.
- Procurement ensures contractual embedding of CoC obligations.

23.4 Document Control

- The Compliance Department maintains version control and records of all updates.
- This Code and related policies are reviewed annually and reissued with revision numbers.

24. Governance and Oversight

24.1 Roles and Accountability

- Managing Director: Ultimate accountability for ethical conduct and compliance.
- Compliance Officer: Overall responsibility for maintaining the Code and compliance systems.
- Functional Heads: Ensure implementation within their areas of responsibility.
- HSE and HR Heads: Oversee respective compliance areas and training.
- Employees: Uphold the Code and report violations.

24.2 Internal Committees

1. Ethics & Compliance Committee – oversees investigations and CAPA tracking.
2. HSE Committee – monitors safety performance and environmental metrics.
3. Diversity & Inclusion Committee – tracks progress toward workforce diversity targets.
4. CSR & Sustainability Committee – governs social and environmental initiatives.

24.3 Reporting to Senior Leadership

Quarterly dashboards and compliance metrics are reviewed by senior management and presented to the Board for oversight.

24.4 External Assurance

When required, Anand NVH may engage third-party experts or auditors to verify Code compliance and sustainability reporting accuracy.

25. Continuous Improvement and Review

25.1 Feedback and Learning

Employees are encouraged to share feedback on this Code and suggest improvements via hr@anandnvh.com or HR.

Lessons from incidents, audits, and stakeholder feedback are incorporated into revisions.

25.2 Review Cycle

This Code shall be formally reviewed at least once every 12 months, or sooner if required by changes in law, regulations, or organisational structure.

25.3 Benchmarking

Compliance benchmarks against peer companies and international frameworks to ensure Anand NVH maintains industry leadership in ethics and sustainability.

25.4 Training and Communication

All updates are communicated through email notifications, team briefings, and refresher training. Managers must ensure their teams are aware of revisions and new obligations.

26. Our Shared Commitment

At Anand NVH, compliance is everyone's responsibility.

We succeed together when we act with integrity, respect, and courage.

Every decision we take reflects on the company's reputation — a reputation built over decades of ethical conduct, technical excellence, and trust.

Remember:

- If in doubt — Ask.
- If you see wrongdoing — Report.
- If you make a mistake — Learn and Correct.

We are all guardians of the Anand NVH legacy. Let us uphold it with pride.

27. Conclusion

This Code is the foundation of Anand NVH's ethical culture.

By adhering to it, every employee contributes to a workplace built on trust, fairness, and responsibility.

When we live our values every day, we protect our people, our business, and the communities we serve.

Together, we make Anand NVH stronger — today, and for generations to come.



Mr Krishnan Iyer

Chief Operating Officer

Date: 15.01.2025



Narendra Yadav

Head - HR

Date: 15.01.2015



Anju Tyagi

Head - Sustainability

Date: 15.01.2015

Anand NVH Products (P) Ltd.

39th KM Stone, NH - 8,
Begumpur Khatola Industrial Area,
Sector-35, Gurgaon - 122 001,
Haryana, India

Phone: +91 124- 4030580

Email : esg@anandnvh.com