

# CODE OF CONDUCT

# Message from the CEO

Dear colleagues,

As a large enterprise we are deeply aware of our impact on people, nature and a vast number of stakeholders. Vinda has evolved from a tissue company into a hygiene company involved in multi-brand hygiene products in diverse categories. We aim to provide quality household hygiene and personal care products and are committed to sustainability, innovation and professionalism & integrity as our core principles. This Code of Conduct provides practical guidelines and will help our staff to make sound judgment in the course of daily work and activities.

> We strictly comply with the laws and regulations of every country, and we are committed to support individual rights and fulfill social responsibility. Employees and representatives of Vinda have the responsibility to understand and comply with this Code and to display the spirit and core values of this Code all times. Through fulfilling the commitments presented by the core principles, the reputation of Vinda will be safequarded. This should make us proud of our work in Vinda and raise other parties' confidence in cooperating and engaging with us.

> > Best Regards,

Christoph Michalshi Chief Executive Officer

April 2016



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# Management of this Code of Conduct

Vinda International Holdings Limited ("Vinda International") and its subsidiaries ("Vinda" or "Vinda Group") supervises the compliance with this Code by making use of regular reports and internal auditing. Every year, Vinda selects several business activities for Code assessment based on the systematic analysis of risk factors. After each review, a comprehensive report, an action plan and the corresponding follow-up items shall be submitted to the management.

Vinda has established relevant procedure to ensure that serious violations of this Code are timely reported, the head of each functional department and each regional President shall timely report any violation of this Code by their respective business departments to the president of the Human Resources (HR) Department, and/or the person in charge of the internal control of the Vinda Group.

The Vinda Human Resource Centre will be responsible for overseeing the implementation of this Code.

#### Foreword

#### Why should we establish a Code of Conduct?

This Code illustrates Vinda's identity and our way of conducting business. We are committed to creating value for our stakeholders and fostering good relationships with our employees, customers, consumers, shareholders, communities and business partners based on our core principles. Our core principles are: Sustainability, Innovation and Professionalism & Integrity.

This Code provides a set of behavioural guidelines concerning how we should display these core principles. It provides guidelines on our behaviour at work and in daily life. This Code also explains what our staff can expect from Vinda.

This Code does not provide exhaustive coverage of all potential scenarios or all relevant laws, regulations and internal policies. Instead, it provides us with a series of standards which we must understand and apply when we decide how to appropriately and responsibly conduct business in good faith. Under certain circumstances, for example in regions with limited regulatory constraints, the standards of this Code may be higher than those of the local laws or practices. In this situation, we should adhere to our Code of Conduct.

This Code contains a number of examples and suggestions concerning compliance issues. The content is designed to illustrate how this Code should be applied under certain circumstances. These examples are not exhaustive. If you have any enquiry concerning the application of this Code, please consult your department supervisor or manager, HR manager or the legal team of the Company.

#### Who should comply with this Code?

This Code applies to all of Vinda's staff worldwide and any individual or unit which obtains Vinda's authorisation to represent Vinda. All of our employees and business partners play a very important role in the protection of Vinda's interest and corporate reputation.

Vinda's management should assume additional responsibilities regarding the Code: they must demonstrate the importance of compliance through action. The key aspects include serving as a role model, and providing advice and assistance to the employees who have moral issues or wish to report potential violations at any time. Every manager is responsible for ensuring the compliance with this Code, including making sure that all employees could receive the essential information and training concerning this Code.

The Vinda Group must adopt and comply with this Code. We encourage the companies in which Vinda holds a minority interest to adopt and comply with this Code or at least establish written policies in accordance with the standards set forth in this Code.

We expect that other business partners (including distributors, suppliers, consultants and independent contractors) would comply with standards which are similar to those reflected in this Code. If any conduct of any of our business partners (including the enterprises in which Vinda holds a minority interest) is conflict with the standards of this Code, we will communicate with such partner in order to agree upon the relevant corrective measures.

#### Consequences of Non-compliance with this Code

We will always seriously deal with any violation of this Code. The contraveners may be subject to disciplinary action, including termination of employment and business partnership. In addition, the non-compliance may result in breach of the law which may cause you (and Vinda) to suffer severe criminal penalty, fines, imprisonment and/or civil liability for damages.

#### Please Report any Potential Violation of this Code

Your reporting of any suspected violation of this Code can protect the integrity and reputation of your colleagues, Vinda and Vinda's brands.

Vinda will conduct timely and, where the circumstances require, in depth investigations and take appropriate measures for each and every suspected reported violation of this Code.

Any information provided by you will be kept confidential. This information will only be used by officers who are required to obtain such information for conducting investigation and handling complaints related to this Code in accordance with Vinda's policies and regulations, unless it is required by law to disclose such information and the relevant materials to the authorities for the purpose criminal proceedings. Retaliation against any person who has lawfully reported a suspected violation of this Code is strictly forbidden by Vinda.

#### How to report?

In general, any suspected incident of violation reported by you should be handled by your direct supervisor or manager. Nevertheless, if for any reason, you feel uncomfortable about notifying your direct supervisor, or if you think that the issues reported by you have not been handled seriously, you may contact any of the following persons or units:

- The direct supervisor of your manager
- Your HR manager
- The trade union of the enterprise, the staff representative or the joint industrial committee (if applicable)
- Contact details of Vinda's Internal Control and Supervision Department are as follows: E-mail address: neikong@vinda.com; telephone no. 86. 750-6168204; Postal address: The Internal Control and Supervision Department of Vinda Paper Company Ltd, 65 Dong Hou Road, Xinhui District, Jiangmen City, Guangdong Province, China; postal code: 529100

Where the local regulations permit, you may report any violation cases on an anonymous basis. However we encourage you to report in your real name, so that you may provide invaluable assistance to us in the follow-up process. We will inform you of the investigation's progress.

Management of this Code of Conduct

#### What will happen after reporting?

If you have reported a suspected violation of this Code, then:

- We will promptly conduct a preliminary investigation of the reported case in a professional manner.
- If the reported matter has been proven to be the case, the corresponding management team will review and reconfirm the investigation findings and make necessary decisions regarding any further action to take including disciplinary action, dismissal or reporting the matter to a local authority such as the police.
- You will receive follow-up information concerning the handling procedure of the issue raised by you.

#### Retaliation is not tolerated

Vinda does not tolerate retaliation in any form against any employee who has reported a suspected violation of this Code in good faith or who has participated in the investigation. The meaning of "in good faith" does not necessarily mean that the content of the suspected case reported by you must be correct, however, you should ensure that when you report a case, the information provided is complete and accurate to the best of your knowledge. Retaliation itself is considered as a serious violation of this Code. Any person who engage in acts of retaliation will be subject to disciplinary action. Staff with serious misbehaviour in this matter may be subject to dismissal.

Staff who willfully and maliciously make false reporting will be subject to an appropriate level of disciplinary action.

## Components of this Code of Conduct **1. Manner of Operation**

Vinda fosters partnership in all commercial activities with honesty and integrity



#### **Responsible Manner of Operation**

In Vinda, we must conduct our business in a responsible manner, and comply with the applicable laws, regulations as well as Vinda's policies. If, before taking action, you have found that the local laws or practices may be in conflict with the principles set forth in this Code, please seek advice from the legal team of Vinda.

- Bribery and any other forms of commercial corruption practices are strictly prohibited. Vinda's staff and persons conducting business on behalf of Vinda should not authorise, promise, provide or offer any payment, gift or other advantages which would affect (or may affect) business decisions or the objectivity of the officer of any public bodies or government officials of any authorities.
- All of Vinda's business and financial records must be kept accurately and must reflect the true and complete picture of the situation and all financial dealings must be truthfully recorded in accordance with Vinda's accounting standards.

Components of this Code of Conduct ► ].Manner of Operation

#### Examples

authority.

Do	Ensure that all payments are truthfully recorded in Vinda's corresponding accounts.
	<ul> <li>Convince Vinda's business partners of our market position with compelling business proof.</li> </ul>
Don't	Commit bribery whether directly or through third parties such as agents or distributors.
	Without approval from Vinda, solicit or accept advantages from others in the course of handling the affairs or business of Vinda.
	Provide any benefit to a public officer (including money, gift, loan, commission, job offer, contract, service, preferential treatment and release of legal liability (in whole or in part)) as the incentive or reward for such officer to use his influence or to perform or abstaining from performing his duty.
	▷ Distort the true nature of any transaction in your reporting to Vinda or any

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Components of this Code of Conduct > 1.Manner of Operation

#### **Fair Competition**

Although Vinda remains engaged in fiercely competitive business environment, we must respect a free market and ensure fair competition. In that regard, Vinda will strictly comply with all the requirements of the relevant Competition Law (also known as "Anti-Monopoly" or "Anti-trust Law"). These laws generally prohibit any behavior or agreements or concerted practices which have the aim of restricting or distorting market competition, including price fixing, market sharing, out-put restrictions, bid-rigging and the abuse of a company's market position.

#### Example

Do	<ul> <li>Collect competitive intelligence only through publicly available information or sources.</li> </ul>
Don't	Don't share sensitive competitive information such as price, volume, profitability and geographic information with competitors.
	Propose to any competitor to reach any agreement or understanding in an explicit or implicit manner regarding sensitive competition issues, such as sharing information regarding product pricing, tendering, terms and conditions of sales or sales regions.
	Communicate with a competitor in a manner that may lead to a breach of any conduct rule of the local competition legislation. You should note that any inappropriate commitments or agreements with our competitors may constitute cartel activities and are strictly prohibited in most places where Vinda is conducting business.
	Conduct price control to any dealer, including reaching a written or oral agreement or understanding in an explicit or implicit manner, or enter into such kind of agreement or understanding with any dealer, or penalize any dealer who fails to comply with the price recommendation.

Note: Should you have any enquiry concerning Competition Law, please contact the legal team of Vinda.

Components of this Code of Conduct > 1. Manner of Operation

#### Gifts and Hospitality

Vinda's staff, and persons conducting business on behalf of Vinda, are strictly prohibited from conducting bribery and accepting any form of commercial bribery, including but not limited to receiving any personal kickback, rebate, purchase discount, property, present, gift, travel, entertainment, hospitality (such as banquet), reimbursement of bills and other benefits.

#### Example

Do	If you do have any doubts about the scope of business etiquette of the hospitality or gift offered by any person who has dealings with Vinda, please consult your direct supervisor.
Don't	Offer presents, banqueting or entertainment, as these acts may cause a misunderstanding to the other party that some other advantages shall be returned, for example, entering into a new contract.
	Accept the hospitality or gift offered by any person who has dealings with Vinda which exceeds the scope of business etiquette, causing the sense of obligation or is in conflict with Vinda's policy and the applicable local laws.

#### **Conflict of Interest**

You must always act in a manner which maximise the interests of Vinda and avoids any conflict of interest. When your personal interests, personal connections or external activities affect or appear to affect your ability to optimise the performance of your job duties, a conflict of interest arises.

#### Example

Do Avoid getting involved in any investment, hobby or other social activity which may cause others to suspect the objectivity of your action or your loyalty to Vinda.
 Timely report all existing or potential conflicts of interest to your supervisor (including the conflicts of interest caused due to your relatives and friends or individuals with whom you have an intimate relationship). Unless you have approval from your supervisor, any companies owned, controlled or managed by you (or your relatives and friends or individuals with whom you have an intimate relationship) should avoid having dealings with Vinda.
 Don't Allow the existence of a direct or indirect reporting relationship with your relatives and friends (or individuals and units with

whom you have an intimate relationship).

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Components of this Code of Conduct > 1.Manner of Operation

#### **Information Security**

We must prevent the misuse or leakage of confidential information. Confidential information includes any information which is not disclosed to the public, such as Vinda's trade secrets, the content of business negotiation and its carrier, internal documents, customer information (files), marketing plans, procurement information, pricing policies, purchase channels, databases, test reports, technical reports, product development information, inventions, manufacturing workmanship, staff and the salary information, product formulas, technical solutions, technical indices, drawings of products or molds, engineering design and financial information. All confidential information is the property of Vinda, which should be maintained in a careful and secure manner. Confidential information provided by a third party should also be considered as the confidential information of Vinda and handled in the same manner.

Do	Remain cautious when discussing the business of the Company or using a laptop computer to work on the office tasks in a public area.
Don't	Without approval from the corresponding management officer, obtain, use or disclose the confidential information to a third party.
	Without corresponding approval, allow a third party to access the confidential information or facilities of Vinda.

Components of this Code of Conduct > 1. Manner of Operation

#### Privacy

Vinda will collect and process the personal information of consumers, employees and third parties in accordance with applicable privacy laws and the relevant policies of Vinda. The confidential information of the staff will also be safely maintained. Unless required by the law, such information should under no circumstances be disclosed to any person whatsoever.

#### Example

Do Ensure that personal data are collected in a lawful and fair manner only for legitimate purposes. Through practical means, inform the data subject the purpose of collecting their personal information and the types of persons whom the information may be transferred to. Ensure that the personal information kept is accurate and free from errors. and the retention time of such information should not exceed the time actually required for realising the original purpose. Adopt practical procedures to protect the personal information against unauthorised or accidental access, handling, deletion, loss or use. Such information is only kept by Vinda in the place where its business is operating. Disclose the policies and ways of processing personal information, and explain the categories and usage of the personal information kept. Ensure that the data subject is entitled to request for the access to their personal information and making correction in case it is found that the personal information is inaccurate. Don't > Share the personal information and details of the Company or a third party with a unit or individual who does not have a lawful business need.

Components of this Code of Conduct ► 1.Manner of Operation

#### **Company Assets**

In accordance with the policy of Vinda, the assets of Vinda should only be used for the Company's business, and should not be used for personal profit, fraudulent activities or any other improper purposes. This provision is applicable to tangible assets and intangible property rights such as patents, trademarks, technical expertise and information systems.

#### Example

Do	Ensure the safety of the company assets and protect them against loss, damage, theft, misuse and unlawful use.
	If occasional use of Vinda's assets (e.g. the Company's computer) for personal purposes is permitted, you should minimize the frequency of usage, and the work performance should not be affected because of such usage.
Don't	▷ Use the Company's assets for conducting personal business.
	Without approval from the Company, transfer the assets of the Company to a third party.

#### **Insider Dealing**

Inside information is the specific information about Vinda International, its shareholders or officers or its listed securities or derivatives, which is not generally known to the persons who are accustomed, or would be likely, to deal in Vinda's shares but would, if generally known to them, be likely to materially affect the price of Vinda's shares. If you have access to the inside information of Vinda, you are not allowed to deal in the shares of Vinda. Furthermore, you are not allowed to recommend a third party to purchase the shares or disclose such information to a third party, including but not limited to friends or family members.

- Don't ▷ Deal in the shares of Vinda or recommend others to conduct such dealing, under the circumstances of being aware of non-public information regarding substantial changes of Vinda (such as the change of profit, financial condition, management, corporate structure, equity and court dispute, or while Vinda shall takeover or merge with or sell a particular large-scale business) and the relevant information has not been disclosed to the public.
- Note: Violation of inside dealing laws will damage the reputation of Vinda and may even be subject to serious civil and criminal liability.

Components of this Code of Conduct > 1.Manner of Operation

#### **Money Laundering**

Vinda should always comply with the anti-money laundering laws and regulations of all countries. Money laundering is any behaviour which disguises the proceeds generated by criminal activities or makes such proceeds appear to be lawful.

#### Example

- Take reasonable measures to identify and evaluate the integrity of our business partners, in order to ensure that the business activities conducted by them are lawful.
  - Remain cautious when you receive funds or you are requested to transfer the funds from any transaction from or to a country which is unrelated to such transaction.
  - Report any funds, the source of which is unknown and any suspicious business activities of your business partners. Tackle the issues faced by you jointly with the financial or legal team of Vinda.

#### Marketing

The products and services must be introduced in a precise manner. Vinda will advertise, promote and market our products and services in a pragmatic manner with detailed descriptions provided and in compliance with all relevant rules and regulations under the local trade description and health legislation. We understand that it is necessary to provide special protection to children while undertaking marketing activities. We do not participate in marketing activities which infringe the rights of children or affect the well-being of children.

Do	<ul> <li>Make sure that you understand and follow all sales and marketing evaluation procedures which are applicable to your work.</li> <li>Make sure that the marketing behaviours which may harm children are cautiously handled, and comply with the local standards and regulations.</li> </ul>
Don't	Provide false statements of Vinda's products or their performance, or approve the provision of such kind of false statements, or provide misleading information concerning Vinda's products or their performance.

## COMPONENTS OF THIS CODE OF CONDUCT 2. Health and Safety

Health and safety are the first priority of Vinda



#### Healthy Work Environment

Vinda is committed to providing safe and healthy work environments for all employees, contractors and suppliers. Our target is "zero accidents", and we continuously enhance the health and safety conditions. We take precautions against potential safety hazards and conduct monitoring and tracking accordingly.

All employees must understand and follow all regulations, policies and procedures concerning health and safety in the regions they work in. You are responsible for correcting or reporting any existing or potentially unsafe conditions, accidents or circumstances which may lead to a work injury or occupational disease. Management officers are responsible for ensuring that the employees and contractors have received adequate training and are provided with necessary safety equipment.



Components of this Code of Conduct ► 2.Health and safety

#### **Quality and Safety of Products**

Vinda aims at enhancing the life quality of all people in the world through its products and services. These products and services provide quality, safe and sustainable solutions which are of good quality-price ratio. Our products comply with the applicable laws and regulations concerning product safety and packaging.

#### Example

 Manufacture, test and pack our products in accordance with sound operation standards and Vinda's policies.

# COMPONENTS OF THIS CODE OF CONDUCT 3. Relationship with the Staff

Vinda's principle is to treat every staff member fairly, impartially and respectfully



#### **Open Communication**

Open communication is the foundation for developing mutual trust between Vinda and its employees. For this reason, Vinda will hold conversations with its staff and representatives in a fair, frank and sincere manner. The Company encourages the employees to raise issues or suggestions concerning their work to their supervisor/manager. Vinda will also ensure that the information concerning the employment terms and conditions and work performance received by the staff shall be clear and easy to understand.

- Have clear and open communication concerning the reasons for Vinda to make decisions which affect the employment relationship.
  - Timely raise the suggestions on improvement of work environment to your supervisor/manager.

#### **Diversity and Anti-discrimination**

We treat all employees equally and respectfully and also maintain their dignity. Furthermore, we provide opportunities for self-development and career development.

Vinda values and will continue to promote the diversity of work environments worldwide. All staff (regardless of gender, marital or parental status, race or nationality, sexual orientation, religion, age and disability) and other groups protected by applicable laws could also enjoy opportunities of being recruited, selected, evaluated and promoted openly, fairly and equally in Vinda in accordance with the laws, regulations and policies of the countries where our business is conducted.

#### Example

Do	<ul> <li>Decide whether to hire a person based on such conditions as education background and work experience.</li> <li>You should realise the potential impact of your behaviours on others.</li> </ul>
Don't	<ul> <li>Talk or make jokes in a manner which belittles or insults others.</li> <li>Treat an individual employee differently or poorly because of the gender, marital or parental status, race or nationality, sexual orientation and religion of such employee.</li> </ul>

#### Harassment

As a member of Vinda, you are responsible for treating others with respect. The Company does not tolerate harassment, intimidation or other improper behaviours in the work environment. If this kind of behaviour is discovered, you must report to your supervisor.

#### Example

Do	Create a work environment which is free of hostility, violence, threat or
	intimidation.

Report any harassment or other improper behaviours of this kind.

Components of this Code of Conduct ► 3.Relationship with the Staff

#### Freedom of Association

Vinda acknowledges our staff's right to organize and join trade unions or activities recognised by the local official authority and laws for the purpose of safeguarding their interests, and also the right to arrange for negotiations and engage in collective or personal negotiations. We respect our staff's right to voluntarily join trade unions or activities recognised by the local official authority and laws. Our practice will comply with the internationally recognised labour standards with sufficient consideration of the laws, regulations and customs of all countries where we engage in business activities. While participating in association activities, Vinda's staff should comply with the laws and regulations of the corresponding countries and regions, and should not violate the laws and regulations or jeopardise the interests of the Company.

#### Example

Do	Respect our employees' right to request for the organisation of trade unions or join the trade unions of their choice, while intimidation and retaliation are not tolerated.
Don't	Interfere when a staff representative participates in the activities recognised by the local official authority and laws.
	Interfere with other Company staff and workers' right to work through blockage or picketing.

#### Salary and Benefits

Vinda will provide employees with fair salary and benefits in accordance with the local laws and regulations and applicable collective agreements of the countries where our business is conducted. If there is no collective agreement, we will follow the relevant standards in the industry.

## Components of this Code of Conduct 4. Individual Rights

Vinda respects individual rights, and so do our business partners



#### **Respect for Individual Rights**

Individual rights are the rights and freedom which a person is entitled to. In all places where our business is conducted, in sufficient consideration of the premise of compliance with the laws, regulations, policies and requirements of the countries or regions and local area where we engage in business activities, Vinda supports and respects individual rights of the countries. The methods adopted by us include:

- Foster and convey our values and standards in workplaces, and in the course of business operation and cooperation with business partners;
- Ensure that our relevant legal procedures are adopted in order to prevent the infringement of individual rights;
- Eliminate any negative impact on individual rights which may be caused by or arise from our business;
- Track the performance of the Company and inform our stakeholders of such information;
- Making use of our influence, promote and support individual rights in the communities where our business is conducted through community participation.

Furthermore, Vinda regards children as stakeholders who need special protection. We respect and support children's rights in the Company and societies in accordance with the guidelines in *Children's Rights and Business Principles*. In the event that our business activities cause any impact on children, children's interests would be our first priority.

Components of this Code of Conduct ► 4.Individual Rights

#### **Child Labour**

Vinda does not tolerate the employment of child labour by our factories or any business partner in the course of business operation. We will comply with the applicable laws of all countries or regions where our business is conducted and the international standards concerning minimum working age.

#### Example

Do > Before hiring staff at any age, make sure that you sufficiently understand the requirements of applicable laws on minimum working age.

#### **Forced Labour**

You must not employ forced or bonded labour or other forms of forced labour. Corporal punishment is prohibited. When the employees are hired, they should not be required to pay such relevant fees as "deposits", and their identity documents should not be confiscated.

This principle should also apply to all staff hired through middle men or agencies.

#### Example

 Peport any condition suspected of employing forced labour, child labour or imposing corporal punishment by any department of Vinda or any supplier, distributor or other business partners.

# Components of this Code of Conduct **5. Nature**

#### Vinda is committed to environmental protection



Respect for environment and environmental protection are the components of Vinda's business model. We are committed to:

- Engaging in procurement and production in a safe, resource-saving and environmentally friendly manner;
- Minimising the impact caused on the environment through the combination of innovation, technology and enhanced efficiency;
- Continuously evaluate the impact of Vinda's entire value chain on the environment; and
- Enhancing our ability to protect the environment with clear and measurable targets.

As a large manufacturer of hygiene products, Vinda has heeded the call of environmental protection organisations to create a sustainable business by engaging in energy conservation. Concerning raw materials procurement, we place eco-certified suppliers in the preferred list, for instance, pulp suppliers which have obtained forest certification (such as FSC or PEFC), and suppliers of auxiliary materials and chemicals which have obtained ISO14001 certification. Concerning energy conservation and emission reduction, Vinda gives priority to clean energy based on the available resources at the factory locations. We occasionally use central heating systems and central effluent treatment facilities in the plants by leveraging the economies of scale of the industrial parks where these plants are located. In plants where in-plant heating facilities are in place, we strive to increase energy efficiency and minimise pollutant emissions through various technological adaptations. Through continuous implementation of various environmental improvement measures, our ability to protect the environment is enhanced, helping us to bring about a win-win situation economically and environmentally.

You should always act in an environmentally friendly manner while performing your job duties.

Components of this Code of Conduct ► 5.Nature

# Example Do Make sure that you use resources effectively during your daily work activities and reduce various types of pollutant emissions. Timely raise innovation suggestions on environmental improvement to your manager. Understand and comply with relevant requirements of international forest certification schemes which are binding on Vinda.

## COMPONENTS OF THIS CODE OF CONDUCT 6. Community

Vinda is committed to becoming a reliable member of the communities where our business is conducted



#### Relationship with the Community

Vinda is committed to make positive contributions to the communities where our business is conducted. We strive to foster long-term and lasting relationships with our communities by holding open and frank conversations.

Do	Make sure that our views expressed in local communities are successfully conveyed and well accepted.
	<ul> <li>Obtain corresponding approval before making donations to community organisations in the name of Vinda.</li> </ul>
Don't	Provide sponsorship or make donations to any organisation under the circumstances which may be regarded as bribery.
	Provide sponsorship or donation to state organisations, political parties or religious organisations.

Components of this Code of Conduct ► 6.Community

#### Communication

Vinda is committed to engaging in open and transparent communication within the scope permitted by trade secrets. We strive to hold constructive and effective conversations with all of our stakeholders.

Example

- Do Seek consent from the direct supervisor/manager before discussing the Company's corporate matters with a journalist such as the Company's business decisions or strategies or any other topics that would be the major interests of the Company, and seek the opinion and approval from Vinda Group CEO Office or the Board Secretary wherever necessary.
   Submit all questions raised by analysts or investors to Vinda's corporate
  - Submit all questions raised by analysts or investors to Vinda's corporate affair department, and ask the corporate affair department to handle and answer such questions.
- Don't Vithout corresponding authorisation, express your views at any personal or public social platform (including but not limited to such media tools as blogs, Weibo, WeChat and other social networking sites) in a manner which forms an impression that you could make statements on behalf of Vinda.

#### **Political Activities**

If necessary, and in sufficient consideration of the premise of the laws, regulations, policies and requirements of the communities where our business and employees are located, participate in relevant debates on the policies concerning our business (through activities such as lobbying).

Do	If you have any query about the lobbying activities, please consult the Board Secretary.
Don't	While taking part in personal political activities, imply that you express the views on behalf of Vinda or that the Company supports your views.
	Use the Company's assets and information for the activities of the political candidates or parties you support.



