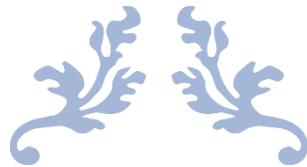


Valency Group of Companies



Title	<b>Group's Code of Conduct</b>	Revision Effective Date	28/01/2026
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**CODE OF CONDUCT**

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Valency International Group



•CODE OF CONDUCT•

## Valency Group of Companies



Title	Group's Code of Conduct	Revision Effective Date	28/01/2026
Doc. No.	COC/REV/001	Revision Number	01

**Procedure name** : Code of Conduct

**Document number** : COC/REV/001

**Revision number** : 01

Revision Approved by:	Mr. Sumit Jain (Group CEO)
Date:	28.01.2026
Signature	<p>DocuSigned by:    <small>97F5B9E11E7E403...</small></p>

#### History of Review & Revision

Revision No.	Description of Change	Responsible Person	Effective Date
1.	Change of Shared Values from “DREAM” to “SUCCESS”	Legal & Compliance Department	28.01.2026

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### Forward: A Message from the Chairman

The Code of Conduct (“**Code**”) of Valency International Group (“**Valency**”) embodies our commitment to ethical conduct, responsible business practices, and being a role model within and beyond our organization. It reflects our shared values, guiding us in all our interactions and decision-making processes. Our vision for the Code is based on the following principles:

1. **Thriving Excellence:** We are dedicated to developing and excelling within our defined business scope. Our Code encourages a culture of continuous improvement, where every individual is empowered to strive for excellence, innovate, and exceed expectations. We embrace challenges and seize opportunities to drive growth, ensuring our organization thrives in a dynamic global marketplace.
2. **Social Responsibility:** We firmly believe that business success should go hand in hand with social responsibility. Our Code emphasizes the importance of being socially responsible in all our actions. We are committed to making a positive impact on the communities we operate in, respecting human rights, promoting sustainable development, and engaging in philanthropic initiatives that contribute to the greater good.
3. **Initiative Spirit and Resourcefulness:** Valency values an entrepreneurial mindset characterized by initiative, resourcefulness, and drive for results. Our Code encourages individuals to take ownership of their work, seek innovative solutions, and demonstrate a proactive approach in overcoming challenges. We foster a culture that rewards creativity, initiative, and the willingness to go the extra mile to achieve success.
4. **Planning & Accountability:** We recognize the importance of effective planning and accountability in achieving our goals. Our Code emphasizes the need for thorough planning, considering potential risks and impacts, and making informed decisions. We hold ourselves accountable for our actions, taking responsibility for the outcomes and learning any mistakes. Transparency and integrity are fundamental principles guiding our behavior.
5. **Role Model Behavior:** Valency aspires to be a role model, both within and outside our organization. Our Code encourages every member of our team to embody the values we uphold and set a positive example for others. We promote professionalism, respect, and ethical behavior in all our interactions. We aim to inspire trust, build strong relationships, and contribute positively to the reputation of our organization and the commodity trading industry.

While we adhere to this objective of ours, Valency ensures that our organization operates with integrity, accountability, and social responsibility. We strive to build a culture where individuals are empowered to excel, ethical behavior is valued, and our actions inspire trust and respect from our stakeholders.

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## Our Vision and Values

Valency upholds four crucial values that guide everything we do. It unites all employees at Valency, connecting us across business units and the vast geography. These values are integral to the way we work and the decisions we make. Living out these values is what shapes the corporate culture at Valency and enables us to make a positive difference.

1. **Commitment:** Our team lives by the principle of being committed towards our clientele in all our trade activities. At the same time, we also value dedication and hard work displayed by our team and reward to encourage them further.
2. **Creating Value:** Creating value for our clients is very important to us. We are dedicated towards providing goods and services of excellent quality with competitive prices to our entire client base.
3. **Fostering Relationships:** We are customer-oriented company and believe in developing strong, positive and long-lasting relationships with all our partners. At Valency, our partner's success is just as important as ours.
4. **Entrepreneurship:** We give our team the freedom to take decisions, give suggestions and motivate them to take initiatives to bring about changes. Grounded in every individual's vision is – Sky's the limit.

Valency's guiding principle is to create intrinsic value for long-term continuing shareholder, achieve profitable growth as well as to generate financial returns. We are also committed towards enhancing the enterprise value for all shareholders. The leadership style that Valency follows is open, inclusive, accessible and non-bureaucratic which helps the organization to deliver the purpose for which the company was incorporated.

Valency caters to multiple parties through its "Shared Values" i.e., **SUCCESS**

## **SUCCESS**

1. **Sustainability:** Dedication to responsible growth and lasting progress.
2. **Unity:** Driven by purpose, connected by pride.
3. **Customer Focus:** Listening, understanding and delivering.
4. **Collaboration:** Teamwork across functions, excellence across results.
5. **Entrepreneurship:** Ownership fuels innovation.
6. **Scalability:** Agile, adaptable, and built to last.
7. **Synergy:** Whole is greater than the sum of its parts.

These values are integral to the way we work and the decisions we make. Living out these values is what shapes the corporate culture at Valency and enables us to make a positive difference.

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Valency remains committed to serving its clients/vendors, investors/stakeholders, employees, and government agencies/regulatory bodies while embedding its core values of Sustainability, Unity, Customer Focus, Collaboration, Entrepreneurship, Scalability, and Synergy (SUCCESS) in every interaction.

- Clients/Vendors:** Valency places its clients and vendors at the center of its business model by prioritizing transparency, responsiveness, and trust. We ensure that all engagements including but not limited to pricing, contractual terms, and product/service details are communicated with clarity and integrity. Valency also recognizes the importance of data privacy and protection. We treat all client/vendor information with strict confidentiality, thereby ensuring sustainable long-term relationships built on responsible growth and lasting progress.
- Investors/Stakeholders:** Valency acts with foresight and responsibility by embedding Environmental, Social, and Governance (ESG) practices into its operations. We integrate environmental considerations into our sourcing, supply chain, and business decisions, thereby reducing ecological impact and contributing to climate change mitigation. By adopting an entrepreneurial mindset with accountability, Valency demonstrates that profitability and sustainability are not mutually exclusive, but complementary drivers of lasting value for stakeholders and society at large.
- Employees:** Valency values its employees as the foundation of its success. Through our Fair Employment Practices Policy, we foster an inclusive, diverse, and non-discriminatory workplace. Our Employees' Grievance Mechanism Policy provides a structured and secure channel for addressing concerns, while our Health & Safety Policy ensures both physical and mental well-being. By promoting unity of purpose and collaboration across teams, Valency empowers its workforce to scale professionally and personally, thereby creating a culture where shared pride drives collective achievement.
- Government Agencies/Regulatory Bodies:** Given its international presence, Valency demonstrates responsibility and adaptability by maintaining strict compliance with all applicable laws, regulations, and international standards. Valency has implemented policies on Sanctions & Embargoes, Anti-Bribery & Corruption, and Anti-Money Laundering, ensuring that neither the organization nor its employees are complicit in unlawful practices. By aligning with regulators through synergistic engagement, Valency not only fulfills its compliance obligations but also reinforces its reputation as a trusted and responsible global enterprise.

In alignment with the Shared Values, Valency has established and implemented the following group-wide policies to guide ethical conduct and responsible business practices:

- Business Integrity Manual (“BIM”)**
  - Conflict of Interest Policy
  - Anti-Money Laundering Policy
  - Anti-Bribery & Corruption Policy

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- d) Due Diligence Policy
- e) Whistleblowers Policy
- f) Sanctions Policy

## **II. Human Resource Policies**

- a) Fair Employment Practices Policy
- b) Business Continuity Plan
- c) Prohibition of Gender Based Violence & Harassment (GBVH) Policy
- d) Recruitment and Hiring Policy
- e) Internal Grievance Redressal Policy
- f) Social Media Usage & Awareness Policy
- g) Disciplinary Action Policy
- h) Dress Code Policy
- i) Employee Referral Policy
- j) Employee Separation Policy
- k) Family Employment Policy
- l) Medical Benefit Policy
- m) Remuneration Policy
- n) Retrenchment Policy
- o) Human Resources Manual

## **III. Environment, Health and Safety Policies**

- a) Environmental Social and Governance Policy

## **IV. Miscellaneous Policies**

- a) Data Protection and Privacy Policy
- b) The Litigation Management Policy
- c) Transfer Pricing Policy

The above-mentioned policies are annexed as **Annexure - A** of this Code.

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### UNDERTAKING

I, \_\_\_\_\_, an employee/customer of Valency International Group, hereby acknowledge that I have received and read the Code of Conduct and annexed policies provided by Valency. I understand that the Code of Conduct contains important policies and guidelines related to business ethics, integrity, and conduct.

I acknowledge that it is my responsibility to thoroughly read, comprehend, and adhere to the principles and policies outlined in the Code of Conduct. I understand that these policies are designed to maintain the highest standards of ethical behavior and integrity in all aspects of Valency's operations.

By signing below, I affirm that:

- I have received a copy of the Code of Conduct and all other policies annexed herein.
- I have read and understood the policies outlined in the Code of Conduct.
- I agree to adhere to the policies and guidelines set forth in the Code of Conduct.

I am aware that any violation of the policies outlined in the Code of Conduct may result in disciplinary action, up to and including indefinite suspension and/or termination of employment/termination of business transaction.

Employee/Customer Name: \_\_\_\_\_

Employee/Customer Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Note:** This undertaking serves as an acknowledgment that the employee has received, read, and agreed to comply with the policies outlined in the Code of Conduct of Valency International Group.