



Retention of Identification Documents or Visa – Compliance & Ethical Guidelines

Effective from:01-04-2024

1. Purpose

This policy outlines the company's stance on retaining employee identification documents, including passports, visas, and other personal records. It ensures compliance with international labour laws, promotes ethical employment practices, and prevents forced labour.

2. Scope

This policy applies to all employees, contractors, and stakeholders within the organization, including those involved in recruitment and human resource management.

3. Policy Statement

The company strictly prohibits the retention of employees' personal identification documents, including but not limited to:

- Passports
- National Identification Cards
- Work Visas or Permits
- Residence Permits

Employees must retain sole possession of their documents at all times. If an employee voluntarily requests secure safekeeping of their documents, the company may provide a secure storage option with documented consent.

4. Legal Framework & Compliance

This policy aligns with the following legal and ethical standards:

- **International Labour Organization (ILO) Standards:** Forced Labour Convention No. 29 prohibits withholding documents as a form of control.
- **National Labour Laws:** Compliance with country-specific regulations regarding employee rights.
- **ESG & Human Rights Commitments:** Adherence to ethical business practices and corporate social responsibility.



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5. Prohibited Practices

Employers, supervisors, or recruiters must not:

- Retain an employee's identification documents without consent.
- Use document retention as a means of control over employees.
- Restrict employees from accessing their documents at any time.
- Force employees to surrender documents under coercion.

6. Alternative Secure Storage (Optional)

If an employee voluntarily requests document safekeeping, the company shall:

- Provide **written consent** from the employee.
- Allow **access to documents at any time upon request**.
- Ensure **documents are securely stored** without coercion.

7. Reporting Violations

Employees who believe their identification documents have been unlawfully retained can report concerns through:

- **HR Department** – Directly contact HR for resolution.
- **Whistle blower Hotline** – Anonymous reporting for confidentiality.
- **Compliance Officer** – Ensure legal compliance and immediate action.

8. Disciplinary Actions

Violations of this policy may result in:

- **Immediate return of retained documents.**
- **Disciplinary action** against the responsible party.
- **Legal consequences** based on applicable labour laws.
- **Company-wide audits** to prevent future violations.

For KSH Automotive Pvt. Ltd.

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