



Anti Corruption Policy

KSH-HR-ESG
-38

Introduction

KSH Automotive Pvt. Ltd. hereafter referred to as the Company is a part of the Saehan Group. The Company is committed to the KSH Values of Cost Minded, Customer Oriented, Trust and Co operation and Creativity. These Values set the standards for the conduct of each and every employee of the Company, thus ensuring that there is a common minimum standard of professional behaviour amongst all employees. These minimum standards of behavior are captured in this document which is called 'KSH Code of Conduct for Employees' and is applicable to all the employees of KSH Automotive and all its subsidiaries in all geographies. Hence, it is mandated that every employee, upon joining the organization, shall commit to the Code of Conduct by signing a declaration in the prescribed format as provided in Annexure A. Further, at periodic intervals, each employee is expected to reaffirm their understanding of and their commitment to the Code of Conduct

1. Anti Corruption

- a) Employees shall not offer, give, solicit or accept bribes in order to achieve business or personal advantages for themselves or others or engage in any transaction that can be construed as having contravened the anti-corruption laws.
- b) Employees shall be cognisant of the fact that bribes may be in any form, monetary or otherwise including but are not limited to unauthorized remuneration such as referral fee, commission or other similar compensation, material goods, services, gifts, business amenities, premiums or discounts of an inappropriate value or of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be viewed as having crossed the boundaries of ethical and lawful business practice.
- c) Prior to giving or accepting any business amenity or other gifts (in whatever form or value), employees shall assess the appropriateness of their actions by assessing if the action could influence or could reasonably give the appearance of influencing the business relationship of the Company with that organization or individual or any business decision arising out of that business relationship.

2. Gifts and Favours

- a) It is the policy of the Company that no employee or any member of his family will accept any form of gifts or favours from contractors, suppliers, clients/customers, or any other party having business dealings with the Company.



Anti Corruption Policy

KSH-HR-ESG
-38

- b) Employees shall declare all gifts offered and received to the Integrity Unit via TG GIFTS online platform. Refer Appendix 1 on the Approval Level for Receiving & Offering Gifts, Hospitality & Entertainment.

- c) All employees shall, if in doubt as to the nature or purpose of the gift or favour, consult the Integrity Unit who shall decide, either in consultation with or through his own accord, the course of action in respect of such gifts or favour.
- d) Employees shall also be bound by the Guideline for Receiving & Offering Gifts, Hospitality & Entertainment provided as part of this Code Any employee found to have received gifts .

3. Entertainment

- a) Employees shall not accept any gratuitous entertainment from any of the Company's clients, customers, suppliers, contractors or any third party with whom the Company has business dealings with unless such entertainment is able to be reciprocated by the employee:
- b) By obtaining reimbursement from the Company as part of the Company's business entertainment expense. Employees shall also be bound by the Guideline for Receiving & Offering Gifts, Hospitality & Entertainment provided as part of this Code.

4. Personal Solicitation

The Company discourages any solicitation by employees during working hours as such solicitations normally disrupt business activity and work routines. Employees are not permitted to sell, distribute or act as agent for the sale or distribution of any type of food or merchandise in the office premises whether during or outside office hours.

5. Disciplinary Action

Any employee who commits misconduct or a breach of rules established by the Company, shall be subject to disciplinary action. Misconduct in employment can be broadly dealt with under three (3) headings namely:

- a) Misconduct relating to duty such as carelessness, misappropriation, insubordination, breach of confidential Company information and etc;
- b) Misconduct relating to discipline such as fraud, theft, fighting, assault, gambling, damage to Company property, drug abuse etc; and Misconduct relating to morality such as committing an indecent act, sexual advancement, pornography, keeping or distributing indecent or pornographic .



Anti Corruption Policy

KSH-HR-ESG

-38

6. Action by the Company

All disciplinary actions taken by the Company shall comply with the Company's established procedures and current legislation. Where there is any conflict between the two, current legislation shall prevail.

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- a) Managers may issue written warnings on the advice of the GHR. All written warnings with justifiable reasons and detailed reporting on the incident(s) shall be recorded in the employee's personal file. In the event where three (3) warning letters for a similar offence have been issued within a period of twelve (12) months, the employee shall be subject to an inquiry to determine further disciplinary action.
 - b) Depending on the gravity of the offence committed and after due inquiry, the employee may be subject to any of the following punishments
 - i. Dismissal without notice
 - ii. Demotion
 - iii. Suspension from work without pay
 - iv. Transfer to another department, division and/or location
 - v. Issue with a written Warning letter
 - vi. Impose any other lesser punishment as the Company deems just

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8. **Summary Dismissal**

- a) The Company reserves the right to dismiss an employee after due inquiry for misconduct including but not limited to dishonesty, insubordination, gross neglect of duty, bankruptcy and criminal conviction, within reasonable time after the misconduct in question without notice, salary or other forms of compensation.
- b) This right is in addition to and does not prejudice its other rights under law." **Right of Appeal**"
- c) An employee who has been imposed a disciplinary action shall have the right to appeal in writing within fourteen (14) days of the announcement of the decision to the Managing Director.

9. **Termination of service**

- a) Notice of termination of service shall be made in writing and in accordance with

the Employee Terms and Conditions of Service.

- b) In lieu of such notice, the employee or the Company shall pay a sum equivalent to the salary for the notice period required.
- c) An employee shall surrender all Company documents, files, vehicles, keys and other Company property in his possession upon his termination of service in the Company.



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- d) The employee shall reimburse the Company the value of the replacement cost for any item(s) or the Company property that is lost or destroyed while under his custody.
 - e) The employee shall settle all outstanding liabilities and obligations with the

Company before any monies due to him are to be released.

For KSH Automotive Pvt. Ltd.



Mr. Yongsung Kim
Managing Director

