



Anti-Corruption & Anti-Bribery Policy

KSH Automotive Pvt. Ltd.

Effective Date: 01 April 2024

1. Introduction

KSH Automotive Pvt. Ltd. is committed to conducting business with the highest standards of integrity, transparency, honesty, and ethical behavior. The organization strictly prohibits all forms of bribery, corruption, fraud, unethical payments, and improper business practices in any form.

The purpose of this policy is to:

- Prevent corruption and unethical conduct
- Ensure compliance with applicable legal and regulatory requirements
- Protect the company's reputation and business integrity
- Promote a culture of ethical business conduct
- Establish clear responsibilities for employees and business associates

The company follows a zero-tolerance approach toward bribery and corruption in all business dealings.

2. Scope

This policy applies to:

- Permanent employees
- Temporary employees
- Trainees and apprentices
- Contract workers
- Consultants
- Directors and senior management



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- Suppliers and vendors
- Contractors and subcontractors
- Agents and intermediaries
- Any third party acting on behalf of the company

This policy applies to all company locations, operations, and business activities.

3. Policy Statement

No employee or representative of the company shall directly or indirectly:

- Offer
- Promise
- Authorize
- Give
- Request
- Accept

any form of bribe, kickback, facilitation payment, gift, commission, or undue advantage intended to improperly influence any business decision or obtain an unfair business benefit.

The company prohibits corruption in dealings with:

- Government officials
- Customers
- Suppliers
- Regulatory authorities
- Business partners
- Any private or public organization



4. Definitions

4.1 Bribery

Offering, promising, giving, accepting, or soliciting anything of value to influence a decision improperly.

4.2 Corruption

Abuse of entrusted power or position for private gain or business advantage.

4.3 Facilitation Payment

Unofficial payments made to expedite routine administrative processes. Such payments are strictly prohibited.

4.4 Kickback

Improper payments made in return for favorable treatment or business advantage.

4.5 Conflict of Interest

A situation where personal interests interfere with professional duties or company interests.

5. General Principles

All employees and representatives shall:

- Act honestly and ethically
- Comply with all applicable laws and regulations
- Maintain transparency in all transactions



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- Avoid situations involving conflicts of interest
- Protect company assets and reputation
- Report suspicious activities immediately

6. Prohibited Conduct

The following activities are strictly prohibited:

6.1 Bribery & Improper Payments

Employees shall not:

- Offer money or gifts to obtain business
- Provide illegal commissions or kickbacks
- Make unofficial payments to authorities
- Influence procurement decisions improperly
- Use third parties to make prohibited payments

6.2 Fraudulent Practices

Employees shall not:

- Submit false expense claims
- Create fake invoices or documents
- Manipulate accounting records
- Conceal financial transactions
- Misuse company funds or assets

6.3 Abuse of Position

Employees shall not:

- Use authority for personal gain



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- Favor suppliers due to personal relationships
- Engage in nepotism or favoritism
- Leak confidential business information

7. Gifts, Hospitality & Entertainment

Business gifts and hospitality shall:

- Be reasonable and lawful
- Be of nominal value
- Not influence decision-making
- Be transparent and properly recorded
- Receive management approval where required

The following are prohibited:

- Cash gifts
- Expensive personal gifts
- Luxury travel or entertainment
- Gifts during tender or procurement decisions
- Personal favors from suppliers or contractors

8. Dealings with Government Officials

Special care must be taken while interacting with government authorities and officials.

Employees shall not:

- Offer unofficial payments
- Provide gifts or favors to influence approvals
- Misrepresent company information



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- Conceal regulatory violations

All interactions with government authorities must be transparent, lawful, and properly documented.

9. Third-Party Due Diligence

The company shall conduct reasonable due diligence before engaging:

- Suppliers
- Vendors
- Consultants
- Agents
- Contractors
- Service providers

Assessment may include:

- Business reputation
- Legal compliance history
- Financial credibility
- Ethical conduct
- Corruption risk evaluation

Third parties found engaging in unethical conduct may face termination of business relationships.

10. Conflict of Interest

Employees must avoid situations where personal interests conflict with company interests.

Employees shall disclose:

- Financial interests in supplier companies



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- Relationships with vendors or contractors
- Outside employment affecting company duties
- Any situation that may influence impartial decisions

Management shall review and address disclosed conflicts appropriately.

11. Financial Controls & Record Keeping

The company shall maintain:

- Accurate financial records
- Transparent accounting practices
- Proper approval systems
- Internal control mechanisms

All transactions must:

- Reflect actual business activities
- Be supported by valid documentation
- Be recorded accurately in company books

The company strictly prohibits:

- Off-the-book accounts
- Hidden funds
- False accounting entries
- Unauthorized payments

12. Reporting of Violations

Employees are encouraged to report suspected:

- Corruption
- Bribery



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- Fraud
- Unethical conduct
- Financial irregularities

Reports may be made to:

- HR Department
- Compliance Team
- Department Head
- Senior Management

All complaints will be:

- Handled confidentially
- Investigated fairly
- Protected from retaliation

Retaliation against whistle-blowers is strictly prohibited.

13. Investigation Procedure

The company reserves the right to investigate any suspected violation.

Investigations may include:

- Review of documents and records
- Interviews with concerned persons
- Audit of transactions
- Supplier or contractor verification

Employees must fully cooperate during investigations.



14. Disciplinary Actions

Violation of this policy may result in:

- Verbal or written warning
- Suspension
- Termination of employment
- Blacklisting of vendors
- Contract cancellation
- Legal or criminal proceedings

Disciplinary action shall depend on the severity of the violation.

15. Training & Awareness

The company shall periodically conduct:

- Ethics and compliance training
- Anti-corruption awareness programs
- Employee communication sessions
- Vendor compliance awareness activities

Training records shall be maintained by HR/Compliance Department.

16. Responsibilities

Management Responsibilities

Management shall:

- Promote ethical business culture
- Ensure implementation of this policy
- Support transparent reporting mechanisms



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- Monitor compliance effectiveness

Employee Responsibilities

Employees shall:

- Read and understand this policy
- Follow ethical business practices
- Report suspicious activities
- Cooperate in investigations

17. Monitoring & Review

This policy shall be reviewed periodically to ensure:

- Continued effectiveness
- Compliance with legal requirements
- Alignment with business operations
- Improvement in internal controls

18. Declaration

All employees, suppliers, contractors, and business associates are expected to comply with this Anti-Corruption & Anti-Bribery Policy and uphold the ethical standards of KSH Automotive Pvt. Ltd..

For KSH Automotive Pvt. Ltd.

Mr. Yongsung Kim
Managing Director