



Prevention of Anti-Competitive Behavior and Unfair Trade Practices Policy

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Effective Date: 01-04-2025

Review Date: Annually

Approved By: Managing Director

1. Purpose

KSH Automotive Pvt. Ltd. is committed to conducting business with honesty, integrity, transparency, and compliance with all applicable competition and trade laws. This policy establishes guidelines to prevent anti-competitive behavior and unfair trade practices and to promote a fair and ethical marketplace.

2. Scope

This policy applies to:

- All employees of KSH Automotive Pvt. Ltd.
- Directors and management personnel
- Contract workers and consultants
- Suppliers, contractors, and business partners acting on behalf of the company

3. Policy Statement

KSH Automotive Pvt. Ltd. shall conduct all business activities in a manner that promotes free and fair competition and prohibits any conduct that may restrict, distort, or unfairly influence market competition.

The company strictly complies with applicable competition laws, anti-trust regulations, and fair trade practices in all jurisdictions where it operates.

4. Prohibited Anti-Competitive Practices

The following activities are strictly prohibited:



Address: Plot No.11C, APIIC Industrial Park, Site A, Ammavaripalli Village, Penukonda, Anantapur, Andhra Pradesh, India-515164.

Email: kshhr@saehani.com

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4.1 Price Fixing

Any agreement, arrangement, or understanding with competitors to:

- Fix selling prices
- Manipulate discounts
- Control pricing strategies
- Establish minimum or maximum prices

4.2 Bid Rigging

Employees shall not:

- Coordinate bids with competitors
- Share tender information improperly
- Influence procurement outcomes unfairly

4.3 Market Allocation

No employee or representative shall engage in agreements with competitors regarding:

- Customer allocation
- Geographic market division
- Product market sharing
- Supplier allocation

4.4 Abuse of Market Position

The company shall not misuse any market position by:

- Restricting customer choices
- Imposing unfair conditions
- Creating barriers to market entry
- Engaging in predatory pricing

5. Prevention of Unfair Trade Practices

KSH Automotive Pvt. Ltd. prohibits:



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- Misleading advertising
- False claims regarding products or services
- Fraudulent business practices
- Misrepresentation of quality, performance, or certification status
- Manipulation of procurement or supplier selection processes

6. Ethical Business Conduct

All employees and business partners shall:

- Act honestly and ethically
- Avoid deceptive practices
- Maintain professionalism in dealings
- Respect legal and regulatory requirements
- Uphold company values and business integrity

7. Transparency and Fair Dealings

The company shall ensure:

- Accurate business records
- Transparent contractual arrangements
- Honest communication with customers and suppliers
- Fair and objective procurement practices
- Proper disclosure of relevant information

8. Compliance with Laws and Regulations

KSH Automotive Pvt. Ltd. shall comply with:

- Competition Act, 2002 (India)
- Applicable anti-trust laws
- Consumer protection regulations
- Fair trade regulations
- Customer-specific compliance requirements

Management shall periodically review legal requirements and update this policy accordingly.



9. Conflict of Interest

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

Employees shall:

- Disclose actual or potential conflicts
- Avoid accepting improper benefits
- Refrain from influencing decisions for personal gain

10. Reporting and Whistleblower Protection

The company maintains a confidential reporting mechanism for employees, suppliers, and stakeholders to report suspected violations.

Reports may include:

- Anti-competitive conduct
- Fraudulent activities
- Unethical trade practices
- Regulatory violations

No person reporting concerns in good faith shall face retaliation, discrimination, or harassment.

11. Training and Awareness

The company shall:

- Provide periodic awareness programs
- Communicate competition law requirements
- Promote ethical business conduct
- Ensure understanding of this policy among relevant personnel

12. Monitoring and Compliance

Management shall periodically monitor:

- Procurement activities



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- Sales practices
- Supplier interactions
- Competitive conduct risks

Internal reviews may be conducted to verify compliance with this policy.

13. Violations and Disciplinary Action

Any employee, contractor, or business partner found violating this policy may be subject to:

- Disciplinary action
- Contract termination
- Legal proceedings
- Regulatory reporting where required

14. Responsibility

The Managing Director and Department Heads are responsible for implementing and monitoring compliance with this policy throughout the organization.

15. Review of Policy

This policy shall be reviewed annually or whenever significant legal, regulatory, or business changes occur.

For KSH Automotive Private Limited

Mr. Yongsung Kim -Managing Director