



KSH Automotive Pvt Ltd- Compliance with Export Restrictions Policy

1. Purpose

The purpose of this policy is to ensure that KSH Automotive Pvt Ltd complies with all applicable export control laws and regulations, including international trade restrictions, embargoes, and sanctions. This policy provides guidance to employees, suppliers, and partners involved in the export process to prevent violations of export laws and ensure that all exported goods are compliant with the legal frameworks governing international trade.

2. Scope

This policy applies to all employees, officers, managers, and contractors of KSH Automotive Pvt Ltd who are involved in the manufacturing, procurement, sale, shipping, or exportation of goods, services, and technologies, both directly and indirectly. This policy also applies to business partners, suppliers, and distributors involved in the export of KSH Automotive products.

3. Definitions

- **Export:** The shipment or transfer of goods, services, or technologies from one country to another.
- **Export Restrictions:** Laws and regulations that control the export of goods, services, technologies, or information to certain countries, organizations, or individuals due to national security, foreign policy, or other concerns.
- **Sanctions:** Government-imposed restrictions that limit trade or business dealings with specific countries, entities, or individuals.
- **Embargoes:** A complete ban on trade with specific countries or regions imposed by governments or international organizations.

4. Policy Guidelines

- **4.1 Legal Compliance**
 - KSH Automotive Pvt Ltd will comply with all applicable national and international export laws, regulations, and restrictions, including those enacted by governments and international bodies such as the United Nations, European Union, and the U.S. Department of Commerce.



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- Employees involved in the export process must ensure that all exports adhere to local laws and global trade restrictions, including sanctions, embargoes, and trade controls.
- **4.2 Restricted Parties and Countries**
 - KSH Automotive Pvt Ltd will not engage in any transactions involving parties (individuals, companies, or organizations) or countries subject to export restrictions, sanctions, or embargoes. A current list of restricted parties and countries will be maintained by the Compliance Department and reviewed periodically.
 - Before any export transaction is initiated, due diligence will be conducted to ensure that the goods, services, or technologies are not being exported to prohibited parties or regions.
- **4.3 Export Licensing and Documentation**
 - In cases where an export license or permit is required, KSH Automotive Pvt Ltd will ensure that all necessary documentation is obtained from the relevant authorities prior to the exportation of goods, services, or technologies.
 - The Compliance Department will be responsible for evaluating the need for licenses, and obtaining and maintaining copies of all export-related licenses, permits, and approvals.
- **4.4 Restricted Items**
 - Certain goods, technologies, or services may be subject to additional export restrictions, including military or dual-use technologies. These items will be clearly identified, and special approval will be sought before export.
 - Employees must be aware of the classification of goods and determine if the items they are dealing with are restricted or require special handling before export.
- **4.5 Screening Process**
 - All export transactions will undergo a screening process to verify that the goods, services, or technologies are not being exported in violation of export control laws.
 - Screening will include checks against government export control lists, including those related to prohibited or restricted parties (e.g., Specially Designated Nationals List, Denied Persons List, Entity List, etc.), and sanctions or embargoed countries.
 - The Compliance Department will establish procedures for conducting these screenings and ensure that employees are trained on how to properly perform checks.
- **4.6 Employee Training and Awareness**
 - All employees involved in the export process must receive regular training on export control regulations, sanctions, embargoes, and compliance procedures.



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- Training will cover how to identify restricted parties and goods, how to obtain necessary licenses, and the importance of compliance in mitigating the risk of legal penalties or business disruptions.
- **4.7 Recordkeeping**
 - KSH Automotive Pvt Ltd will maintain detailed records of all export transactions, including documentation related to licensing, screening results, and due diligence efforts.
 - These records will be retained for a minimum of five years (or as required by local laws) and made available for audit by relevant authorities upon request.
- **4.8 Reporting and Non-Compliance**
 - Any suspected violation of export control laws, regulations, or restrictions should be immediately reported to the Compliance Department for investigation.
 - Employees who intentionally or negligently violate this policy may face disciplinary actions, including termination, fines, and legal consequences.
 - KSH Automotive Pvt Ltd will cooperate fully with regulatory authorities in investigating any violations and take corrective action where necessary.

5. Responsibilities

- **Management:** Ensure the establishment and enforcement of export compliance policies and procedures across all levels of the organization.
- **Compliance Department:** Responsible for overseeing export compliance, including licensing, documentation, and monitoring transactions for adherence to export restrictions.
- **Employees:** Follow established procedures, participate in training, and report any suspected violations of this policy.
- **Legal Department:** Provide guidance on legal matters related to export controls and sanctions and assist in the resolution of compliance issues.

6. Consequences of Non-Compliance

- Non-compliance with export control laws and regulations may result in severe penalties, including fines, criminal charges, and loss of export privileges.
- Employees found violating this policy may face disciplinary action, including termination and potential legal consequences. Suppliers or partners who fail to adhere to export regulations may have their contracts with KSH Automotive Pvt Ltd terminated.



KSH Automotive Pvt. Ltd.

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7. Review and Amendments

- This policy will be reviewed annually or as needed to ensure that it remains up-to-date with changes in export laws and regulations.
- Any updates or amendments to the policy will be communicated to all employees and stakeholders involved in export activities.

8. Conclusion

KSH Automotive Pvt Ltd is committed to conducting all business operations in full compliance with export control laws and regulations. By adhering to this policy, we help safeguard the integrity of our operations, ensure the protection of global trade, and prevent legal and reputational risks associated with non-compliance.

For KSH Automotive Pvt. Ltd.

A handwritten signature in black ink, appearing to read 'Yongsung Kim', is positioned to the left of the KSH logo.

Mr. Yongsung Kim
Managing Director

