



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

Email: [govind@saehani.com](mailto:govind@saehani.com)

CIN -U28999AP2017FTC107297, Tel: +91-9133442003

## KSH Automotive Pvt Ltd - Ethical Management Policy

### 1. Commitment to Ethical Management

KSH Automotive Pvt Ltd is dedicated to conducting business with integrity, transparency, and accountability. Ethical behavior is expected from all employees, management, and stakeholders.

### 2. Zero Tolerance for Corruption & Bribery

We strictly prohibit any form of corruption, bribery, extortion, or embezzlement. Employees must not offer, accept, or solicit gifts or payments that could influence business decisions. The agreement is subject to periodic review and represents KSH Automotive's commitment to conducting business ethically and sustainably.

### 3. Compliance with Laws & Regulations

All business operations must comply with applicable local, national, and international laws related to ethical conduct and anti-corruption.

### 4. Sensitive Transactions

This policy governs approval procedures for gifts, travel, and hospitality at KSH Automotive Pvt. Ltd. All gifts exceeding specified limits require prior approval and registration. Third-party funded travel needs pre-approval with documented justification. Cash gifts, excessive hospitality, and solicitation of perks are prohibited. Policy violations may result in termination. The company reserves audit rights, and this policy undergoes annual review to maintain ethical standards and legal compliance.

### 5. Fair Business Practices

We promote fair competition and strictly oppose fraudulent practices, insider trading, and conflicts of interest. This agreement establishes an ethical business framework between KSH Automotive Pvt. Ltd. and its suppliers, requiring adherence to fair labor practices (prohibiting child/forced labor and discrimination), environmental sustainability, community engagement, and operational transparency. Suppliers must maintain clear product specifications, consistent quality, and accept fair pricing with timely payments. KSH reserves the right to conduct compliance audits and expects ethical sourcing throughout the supply chain, with remediation processes for non-compliance. The agreement is subject to periodic review and represents KSH Automotive's commitment to conducting business ethically and sustainably.

### 6. Whistleblower Protection

Employees and stakeholders are encouraged to report unethical behavior through a confidential whistleblower mechanism. Retaliation against whistleblowers will not be tolerated. The agreement is subject to periodic review and represents KSH Automotive's commitment to conducting business ethically and sustainably.

### 7. Responsible Financial Practices

All financial transactions must be accurately recorded, and financial reporting must be transparent to prevent fraud and mismanagement.

### 8. Ethical Supply Chain Management

We work with suppliers and partners who adhere to ethical business standards and reject corruption in all forms.



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## 9. Training & Awareness

Regular training programs will be conducted to educate employees on ethical practices and anti-corruption measures.

## 10. Disciplinary Actions

Violations of this policy will result in strict disciplinary actions, including termination and legal consequences.

## 11. Subcontract Agreement

KSH Automotive Pvt. Ltd. is committed to maintaining the highest standards of quality, integrity, and compliance throughout our supply chain. All the Parties are hereby instructed to read the conditions of the Subcontract agreement carefully and adhere to it. While drafting a subcontracting agreement the employee shall:

- Mention the domicile of the Subcontracting Party
- Provide Country specific Rules and Regulations applicable to the Subcontracting Party
- Give a copy of Rules and Regulations to the Subcontracting Party
- Reserve the right to audit subcontractor work, records, and compliance with your policies
- Detail all regulatory compliance expectations, including specific industry regulations and general employment laws.
- Define specific performance metrics, quality standards, and mechanisms for addressing substandard work.

## 12. Reporting and Resolution Mechanism

- I. Employees shall maintain vigilance towards any breach of the Code of Ethics. In the event of a perceived breach of trust or the provisions of the code, employees shall promptly report the same to the immediate supervisor or the concerned authority.
- II. While dealing with sensitive issues, employees can directly lodge a discreet complaint through the dedicated hotline or through secure email to : [complaints.ksh@saehani.com](mailto:complaints.ksh@saehani.com).
- III. The company would take reasonable measures to keep the identity of the complainants private as per the Whistleblower Protection Act, 2014.
- IV. On receipt of a formal complaint through the proper channel, a direct & secure line of communication would be established with the complainant as part of the investigation to assess the merit of the complaint. If the complaint is deemed of merit, it would be either resolved at the appropriate level or handed over to the internal complaints committee presided by the ombudsman, based on the severity and complexity of the complaint. For complaints that are deemed of without merit, the company would take reasonable measures to protect the complainant from undue discrimination and prosecution, and may refer the complainant for training and educational activities related to the company's policies and procedures.
- V. For each complaint, a formal resolution shall be documented and kept in record within the ambit of legal provisions, guaranteeing the anonymity of the complainant in the public documents.

By adhering to this policy, KSH Automotive Pvt Ltd reinforces its commitment to ethical business conduct and the prevention of corruption in all operations.

**For KSH Automotive Pvt. Ltd.**



## KSH Automotive Pvt. Ltd.

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**Mr. Yongsung Kim**  
**Managing Director**

