



## Policy on Sensitive Transactions: Gifts, Travel & Hospitality

**Issued by:** KSH Automotive Pvt. Ltd.

**Applicability:** All employees, directors, vendors, and business partners

### 1. Purpose

To ensure ethical business practices and compliance with applicable laws, this policy sets forth the approval procedures for gifts, travel, and hospitality expenses.

### 2. Scope

This policy applies to all employees and business associates engaging in transactions on behalf of the company.

### 3. Approval & Reporting Requirements

#### 3.1 Gifts

- Employees must not offer or accept gifts exceeding without prior approval from the [Department Head / Compliance Officer].
- Gifts intended to influence business decisions are strictly prohibited.
- All gifts exceeding the specified limit must be recorded in the **Gift Register** maintained by the Compliance Department.

#### 3.2 Travel & Hospitality

- Business travel, including flights, accommodation, and meals funded by third parties, must be pre-approved by the [Senior Management / Compliance Officer].
- Employees must submit a travel request form along with supporting documents for approval at least before travel.
- Any reimbursement claims must be supported by receipts and reviewed by the **Finance Department**.

### 4. Prohibited Transactions

- Gifts in the form of cash or cash equivalents (e.g., gift cards, vouchers) are not permitted.



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- Lavish or excessive hospitality that may create a conflict of interest is prohibited.
- Employees must not solicit gifts or travel perks from vendors, clients, or partners.

## 5. Consequences of Non-Compliance

- Any violation of this policy will result in disciplinary action, including potential termination.
- The company reserves the right to audit all transactions related to gifts and travel.

## 6. Review & Amendments

This policy will be reviewed annually and amended as necessary to align with company ethics and legal standards.

