



## KSH Automotive Pvt Ltd- Prevention of Money Laundering Policy

### 1. Purpose

The purpose of this policy is to establish and maintain effective measures to prevent the use of KSH Automotive Pvt Ltd's operations for money laundering or related criminal activities. The company is committed to complying with all relevant Anti-Money Laundering (AML) laws and regulations to ensure that its business activities remain free from criminal influence and that the integrity of its financial operations is maintained.

### 2. Scope

This policy applies to all employees, contractors, agents, and partners of KSH Automotive Pvt Ltd. It encompasses all aspects of the company's business operations, including sales, procurement, finance, customer interactions, and supply chain management.

### 3. Definitions

- **Money Laundering:** The process of concealing the origins of illegally obtained funds, typically by means of transfers or transactions that make the funds appear legitimate.
- **AML (Anti-Money Laundering):** Laws, regulations, and procedures that aim to prevent the process of money laundering and financing of illegal activities.
- **Suspicious Activity:** Any transaction or activity that raises doubts about the legitimacy of the source of funds or the purpose of the transaction.
- **Customer Due Diligence (CDD):** The process of identifying and verifying the identity of customers and assessing their financial activities to ensure compliance with AML regulations.

### 4. Policy Guidelines

- **4.1 Compliance with Laws and Regulations**
  - KSH Automotive Pvt Ltd is committed to full compliance with all applicable local, national, and international anti-money laundering laws and regulations.
  - Employees and business partners are required to adhere to the principles of this policy and cooperate with relevant authorities when required.
  - The company will monitor developments in AML regulations and update its policies and procedures as necessary to remain in compliance.



- **4.2 Customer Due Diligence (CDD) and Know Your Customer (KYC)**

- KSH Automotive Pvt Ltd will implement a robust Customer Due Diligence (CDD) process to identify and verify the identity of its customers and partners, particularly for high-value transactions or new business relationships.
- KYC (Know Your Customer) procedures will be followed to gather sufficient information about customers and assess the legitimacy of their financial activities.
- Enhanced due diligence will be conducted for customers and transactions involving higher risks, such as those involving countries with weak AML regulations or politically exposed persons (PEPs).

- **4.3 Monitoring and Reporting Suspicious Activity**

- KSH Automotive Pvt Ltd will establish a system to monitor transactions and business relationships for signs of suspicious activity that may indicate money laundering.
- Any transaction or behavior that appears unusual, such as unusually large transactions, inconsistent transaction patterns, or any attempt to conceal the origin of funds, will be flagged for further investigation.
- Employees are required to report any suspicious activity immediately to the designated AML officer or the Compliance Department. Reports will be reviewed, and appropriate action will be taken in accordance with legal requirements.
- The company will cooperate with authorities in the investigation of suspicious activities and take steps to report any findings to relevant regulatory bodies as required.

- **4.4 Record Keeping and Documentation**

- KSH Automotive Pvt Ltd will maintain records of all financial transactions, including customer identification information, transaction details, and the results of any due diligence processes.
- These records will be kept for a minimum period of five years (or as required by law) to facilitate audits and inspections by regulatory authorities.

- **4.5 Internal Controls and Procedures**

- KSH Automotive Pvt Ltd will implement internal controls designed to detect and prevent money laundering, including transaction monitoring systems and auditing processes.
- The company will ensure that all departments involved in financial transactions (e.g., Finance, Sales, Procurement) follow standardized procedures that align with AML guidelines.
- Regular audits will be conducted to evaluate the effectiveness of internal controls, ensuring they remain robust and up-to-date.

- **4.6 Employee Training and Awareness**



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

- All employees, particularly those in financial, sales, and customer-facing roles, will receive regular training on recognizing and preventing money laundering activities.
- Training will include information on AML laws and regulations, the identification of suspicious activities, and the proper reporting channels for suspected violations.
- The company will ensure that employees are fully aware of the potential risks and their responsibility in preventing money laundering.
- **4.7 Reporting and Whistleblowing**
  - Employees are encouraged to report any suspicions or concerns regarding potential money laundering activities through the established internal reporting channels, such as the compliance officer or whistleblowing hotline.
  - The company will protect employees who report suspicious activities from retaliation, and all reports will be treated confidentially and investigated thoroughly.

## 5. Responsibilities

- **Management:** Ensure the implementation of the AML policy and its enforcement across the organization, and provide necessary resources for training and monitoring efforts.
- **Compliance Officer:** Oversee the AML program, monitor transactions for suspicious activity, ensure compliance with legal requirements, and maintain records of reports made by employees.
- **Employees:** Comply with the procedures outlined in this policy, report suspicious activities, and participate in training and awareness programs.
- **Third-Party Partners:** Ensure that all suppliers, customers, and business partners comply with the principles of this policy and assist in maintaining a money laundering-free environment.

## 6. Consequences of Non-Compliance

- Employees found to be in violation of this policy, including involvement in money laundering activities or failure to report suspicious activity, will face disciplinary actions, which may include termination of employment, legal action, and potential reporting to relevant authorities.
- Business partners, customers, or suppliers found to be involved in money laundering may have their contracts terminated, and the company will take legal action if necessary.

## 7. Review and Amendments

- This policy will be reviewed regularly to ensure that it remains effective and compliant with the latest AML laws and regulations.



# KSH Automotive Pvt. Ltd.

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

- Any updates to the policy will be communicated to employees, and regular training will be provided to keep all stakeholders informed.

## 8. Conclusion

KSH Automotive Pvt Ltd is committed to preventing money laundering and maintaining the highest standards of integrity in its operations. By adhering to this policy, the company aims to protect its reputation, comply with legal requirements, and contribute to the fight against financial crimes.

**For KSH Automotive Pvt. Ltd.**

A handwritten signature in black ink, appearing to read 'Yongsung Kim', is positioned above the name of the Managing Director.

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

A large, light green, semi-transparent watermark of the KSH logo is centered in the background of the page, behind the signature and name.