



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

Email: govind@saehani.com

CIN -U28999AP2017FTC107297, Tel: +91-9133442003

Third-Party Anti-Bribery Due Diligence Policy

KSH Automotive Pvt Ltd

Effective Date: 01-August-2024

Reviewed By: Compliance & Legal Department

Next Review: 01-August-2025

1. Purpose

This policy establishes a structured due diligence process for engaging third parties to prevent and detect bribery and corruption risks associated with such relationships. It supports compliance with applicable laws, including the Prevention of Corruption Act (India), FCPA (USA), UK Bribery Act, and ISO 37001 standards.

2. Scope

This policy applies to all third parties who act on behalf of or interact with KSH Automotive Pvt Ltd, including:

- Suppliers and vendors
- Contractors and subcontractors
- Consultants and advisors
- Agents and representatives
- Distributors and resellers
- Joint venture and M&A partners

3. Responsibilities

Role	Responsibility
Compliance Team	Policy oversight, due diligence evaluation, escalation
Procurement	Conduct preliminary screenings, gather documents



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Role	Responsibility
Legal Department	Review contracts, assess legal risk
Management	Approve onboarding of high-risk third parties

4. Due Diligence Process

4.1 Risk Assessment and Categorization

Each third party shall be classified as:

- **Low Risk** – Basic business registration and KYC
- **Medium Risk** – Financial vetting, adverse media screening
- **High Risk** – Enhanced due diligence, ownership verification, site visits, legal review

4.2 Due Diligence Measures

Risk Level	Required Actions
Low	PAN/GST verification, signed Code of Conduct
Medium	Reference checks, bank details, blacklists screening
High	Third-party verification, site visit, political exposure check, Ultimate Beneficial Ownership (UBO) disclosure

5. Contractual Requirements

All agreements with third parties must include:

- Anti-bribery and corruption clause
- Compliance with local and international anti-bribery laws
- Right to audit
- Termination clause for violations
- Commitment to cooperate in investigations



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6. Red Flags and Escalation

Red flags may include:

- Refusal to disclose ownership
- Requests for cash payments
- Unusual commissions or bonuses
- Government connections not declared

All red flags must be escalated to the Compliance Officer and reviewed before any agreement is signed.

7. Recordkeeping

The company shall maintain a centralized **Due Diligence Register** including:

- Third party name and contact details
 - Risk level and due diligence documents
 - Final decision and approval date
 - Review/renewal cycle
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8. Monitoring and Reassessment

- High-risk third parties: reviewed **annually**
 - Medium-risk: reviewed **every two years**
 - Low-risk: reviewed **every three years**
 - Third-party performance and ethical compliance shall be monitored continuously.
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9. Training and Awareness

KSH will provide anti-bribery awareness training to employees and third parties annually. Attendance records will be maintained.



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10. Whistleblower Access

Third parties are encouraged to report concerns or unethical behavior via:

- **Email:** complaints.ksh@gmail.com
- **Phone:** +91-95334-42003

Anonymity and protection from retaliation are assured.

11. Review and Updates

This policy will be reviewed annually by the Compliance Committee and updated based on:

- Legal/regulatory changes
- Business operations changes
- Feedback from audits or investigations

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

Mr. Yongsung Kim
Managing Director