



INDIGENOUS PEOPLES' RIGHTS POLICY

(Including Land, Forest, and Water Rights)

Policy Number: ESG/IPR/2025/01

Prepared By: ESG & Compliance Cell

Approved By: Managing Director

Version: 1.0

1. Purpose

To affirm KSH Automotive Pvt Ltd's commitment to respecting and promoting the rights of **Indigenous Peoples (Adivasis/tribal communities)**, including their rights to land, forests, and water, in line with international standards, Indian constitutional protections, and environmental sustainability principles.

2. Scope

This policy applies to:

- All company operations, projects, supply chains, and expansions
- All employees, contractors, suppliers, and service providers
- All stakeholders impacted by company activities in or near Scheduled Areas, forest lands, tribal habitats, or environmentally sensitive zones

3. Policy Commitment

KSH Automotive Pvt Ltd commits to:

- Respecting the identity, culture, and rights of Indigenous Peoples
- Recognizing **customary rights over land, forests, and water**
- Ensuring **Free, Prior and Informed Consent (FPIC)** before engaging in projects affecting indigenous communities



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- Avoiding any operations that cause displacement or degradation of indigenous habitats without lawful consent and rehabilitation
- Promoting inclusion and fair opportunity for indigenous people in employment, education, and economic development

4. Legal and Global Framework

This policy is guided by:

- **The Constitution of India – Fifth Schedule & Article 244**
- **Forest Rights Act, 2006 (FRA)**
- **Panchayats (Extension to Scheduled Areas) Act, 1996 (PESA)**
- **UN Declaration on the Rights of Indigenous Peoples (UNDRIP)**
- **ILO Convention No. 169 (not ratified by India, but used as a best-practice reference)**
- **BRSR and ESG Reporting Frameworks**
- **Environmental Protection Act, 1986**

5. Key Principles and Implementation Measures

5.1 Land, Forest, and Water Rights

- KSH shall **not acquire, lease, or utilize** land within or adjacent to tribal settlements or forest areas without:
 - Approval from the **Gram Sabha**
 - Compliance with **FRA, PESA, and Forest Conservation Act**
 - Evidence of **voluntary and informed consent**
- No activities will be undertaken that impact access to **natural resources** traditionally used by tribal communities (e.g., water bodies, grazing lands, NTFPs).

5.2 Engagement and Consent

- All engagements with indigenous communities will follow **FPIC** principles:
 - **Free:** Without coercion or manipulation
 - **Prior:** Before any activity starts
 - **Informed:** With full disclosure of impacts, options, and rights



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- **Consent:** Meaningful agreement through village councils or tribal leadership
- Public consultations and social impact assessments (SIA) shall be conducted transparently.

5.3 Inclusion in Employment and Development

- Efforts will be made to recruit and skill **local tribal youth** under CSR and employment programs.
- Indigenous women shall be encouraged through specific gender-sensitive programs.
- Support for education, health, and entrepreneurship will be extended under the **CSR Policy**.

5.4 Grievance Redressal

- A separate grievance mechanism will be made accessible to local communities in **regional languages**.
- Complaints can be raised to:
 - Site HR team
 - CSR representative
 - Independent grievance panel (where required)

6. Supply Chain Expectations

All **suppliers and contractors** must:

- Respect indigenous rights
- Avoid land acquisition or resource usage that violates tribal or forest rights
- Sign a **Code of Conduct** ensuring alignment with this policy

7. Monitoring and Reporting

- Annual **ESG and CSR reports** will include updates on:
 - Engagements with indigenous communities
 - Projects near tribal or forest regions
 - Resettlement, compensation, or rehabilitation initiatives (if any)
- Third-party audits or social impact assessments may be conducted where relevant.



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8. Non-Compliance

Any breach of this policy—internally or by a vendor—may result in:

- Termination of employment or contracts
- Legal escalation as per applicable laws
- Reputational risk disclosures in ESG reporting

9. Review and Revision

This policy shall be reviewed:

- **Annually** or upon any significant expansion of operations
- Whenever there are legal updates related to tribal/forest rights
- In consultation with local stakeholders where needed

A handwritten signature in black ink, appearing to be 'Yongsung Kim', is written over a large, faint, light green watermark of the KSH logo.

Mr. Yongsung Kim
Managing Director