

1. 0 Purpose

This Ethics Policy establishes the principles and guidelines for ethical conduct within the KVMG. It ensures compliance with laws, promotes integrity and prevents misconduct across all operations.

2. 0 Scope

Applies to all employees, contractors, suppliers and business partners associated with the KVMG.

3. 0 Key Ethical Management Principles

3.1 Ethical Management and Anti-Corruption

- Employees must act with honesty, fairness and transparency.
- Strictly prohibit bribery, kickbacks and facilitation payments.
- Any gifts or hospitality must comply with company policy and be reported.

3.2 Preventing Conflict of Interest

- Employees must disclose any situation where personal interest could interfere with company interest.
- No employee should engage in outside business that competes with the organization without prior approval.

3.3 Prevention of Anti-Competitive Behaviour and Unfair Trade Practices

- Prohibit price-fixing, bid-rigging, market allocation or other anti-competitive agreements.
- Commit to fair competition and compliance with antitrust laws.

3.4 Prevention of Counterfeit Parts

- Ensure sourcing only from approved and verified suppliers.
- Implement strict incoming quality checks and
- Conduct supplier audits to prevent counterfeit materials.
- Disposal of counterfeit materials should be destroyed / unusable forms / broken the child parts if applicable

3.5 Compliance with Export Restrictions

- Follow all international and domestic trade laws, sanctions and embargoes.
- Screen customers and transactions to avoid prohibited exports.

3.6 Protection for Internal Whistleblowing and Anti-Retaliation

- Provide a confidential channel for employees to report unethical behaviour.
- Prohibit retaliation against whistleblowers and ensure anonymity where requested.

3.7 Prevention of Money Laundering

- Conduct due diligence on customers and suppliers to prevent illegal financial activities.
- Report any suspicious transactions to the compliance team immediately.
- Effective Implementation of Antibribery Management system (ABMS) in line with ISO 31000: 2025 requirements

3.8 Financial Responsibility

Maintain complete, accurate and timely records for all financial transactions.

- Prohibit falsification or alteration of company records.

3.9 Information Disclosures

- Disclose all necessary financial and operational information accurately and promptly.
- Avoid misrepresentation, omission, or misleading statements in any reports.
- Effective Implementation of Information Security Management system (ISMS) in line with ISO 27001: 2022 requirements

3.10 Intellectual Property Protection

- Safeguard company IP, including patents, trademarks, copyrights and trade secrets.
- Customer drawing / Specification should not be given to others
- Respect third-party IP and avoid unauthorized use.

3.11 Fair Trade

- demonstrate our commitment to embed sound governance, deliver transparency, tackle corruption, manage risks and provide value through strong governance and robust business ethics.

3.12 Unethical Behaviour

- If any employees not followed ethical Behaviour, Immediately the respective employees will be terminated from the Service or Suspension to 10 days depending on seriousness of the Cases, it will differ from case to case

Applicable to	Reporting To	Action to be taken	Responsibility
Employees not followed the Ethics	Director / MD	❖ 10 days Suspension ❖ Termination to service	HR - Admin

4. Establishing a Code of Ethics

Currently, the company **have a formal Code of Ethics or guidelines**. This policy will serve as the foundation for:

- Drafting a formal **Code of Ethics & Conduct**.
- Training employees on ethical principles and compliance requirements.
- Developing reporting and monitoring mechanisms.

5. Responsibilities

Policy Defined by	MD / Director
Policy communicated by	ESG Coordinator
Ethical Management and Anti-Corruption	Ethics & Compliance Team
Preventing Conflict of Interest	HR / Managers / Compliance team
Prevention of Anti-Competitive Behavior and Unfair Trade Practices	Compliance Team
Prevention of Counterfeit Parts	Quality Assurance / Purchase / Supplier Quality Engineering
Compliance with Export Restrictions	Compliance Team
Protection for Internal Whistleblowing and Anti-Retaliation	HR Ethics & Compliance
Prevention of Money Laundering	Finance / Compliance Team
Financial Responsibility (Accurate Record-Keeping)	Finance / Accounting
Information Disclosures	Compliance team
Intellectual Property Protection	IT/HR
Unethical Behavior	HR / Ethics & Compliance team / Managers

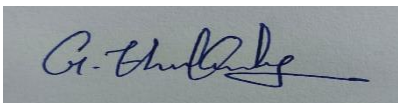
- **Management:** Ensure awareness, training, and enforcement.

- **Employees:** Comply with this policy and report any violations.
- **Compliance Team:** Monitor adherence and investigate misconduct.

6.0 REVIEW FREQUENCY

Frequency	Reviewer	Communication to
Once in a Year	MD / Directors	Respective employees

Rev.no	Rev.Date	Revision Reason
00	25.08.2025	Initial release
01	10.09.2025	Key Ethical Management Added

Prepared by	Approved by
	
ESG Coordinator	Director / MD