

## INTERNATIONAL SANCTIONS POLICY

**INTRODUCTION:** As a Company, we are committed to carrying on business in accordance with the highest ethical standards. This includes complying with all applicable trade sanctions regulations ("Sanctions Laws") in the countries in which we operate. The Company, the Board of Directors and its management are committed to complying with all laws. Any employee who violates the rules in this Policy or who permits anyone to violate those rules may be subject to disciplinary action, up to and including dismissal and may be subject to personal civil or criminal fines.

**POLICY STATEMENT ON SANCTIONS:** It is the Company's policy to comply with all Sanctions Laws in our operations worldwide. To this end, the Company will comply with all economic and trade sanctions applicable to our business activities. This Policy is intended to help employees and any third party acting on the Company's behalf to understand where breaches of Sanctions Laws might arise and to support them in making the right decisions in line with the corporate position as stated in this Policy. No employee or third party shall suffer as a consequence of bringing to the attention of senior management, in good faith, a known or suspected breach of this Policy.

**WHO MUST COMPLY WITH THIS POLICY?:** This policy applies to all persons working for

**KASG** or any group company or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

**WHO IS RESPONSIBLE FOR THE POLICY?:** The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. All senior management have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring that internal control systems and procedures are effective.

**WHICH SANCTIONS LAWS APPLY?:** We are required to comply with all Sanctions Laws in view of the international nature of our business. For example, an activity involving persons, companies or countries subject to sanctions in the US is still prohibited by the Policy even if that activity would be conducted entirely outside of the US. The Company's Policy is very simple in that we shall comply with Sanctions Laws in those countries in which we operate.

**RED FLAG REVIEW:** There are a number of issues which should cause us to conduct further investigation into whether a particular transaction or relationship may present a potential economic trade sanctions regulatory issue. All employees shall look for any red flags or suspicions that may indicate the direct or indirect involvement of a restricted territory, restricted party, controlled item, service, enduse or any other sanctions compliance concern.

Examples of Red Flags to be reported include:

- (a) A lack of information as to the identity of the end-client involved parties and/or the reluctance of a party to provide such information;
- (b) Unusual invoicing requests;
- (c) Unusually favourable payment terms;
- (d) Any suspicion or evidence to suggest the possible involvement of a restricted territory or restricted party.

**COMPLIANCE CONTROLS :** In order to ensure compliance with this Policy, senior management shall: (a) Monitor economic trade sanctions regulations and update the business in the event of any material change; (b) Determine and approve controls to be followed in specific regions where applicable;

(c) Provide legal advice and guidance on specific situations on request, including on resolution of issues and red flag reviews; (d) Conduct ad hoc risk assessments as required in high risk regions and monitor any specific processes and controls.

**EMPLOYEE RESPONSIBILITY:** All employees have the obligation to read and comply with this policy, to understand and identify any red flags that may arise and to escalate potential compliance concerns relating to sanctions to senior management. No actions should be taken prior to receiving advice and/or instructions.

**NON-COMPLIANCE:** Any employee who violates this policy may be subject to disciplinary action in addition to any other potential actions or penalties resulting from a breach.

**UPDATES, REVIEW AND OWNERSHIP OF THIS POLICY:** This policy is subject to review and update from time to time and any update shall be implemented by way of a revised policy statement distributed to all employees and any third party acting on the Company's behalf.

## CODE OF CONDUCT

As an employee of **KASG OIL & PETROCHEM INDIA**, (hereinafter referred to as **KASG**), it is important that you know what personal conduct is expected of you while on the job. In most instances, your own good judgment will tell you what the right thing to do is. In addition to complying with **KASG** policies and job specific requirements, you are also expected to obey the rules and regulations of **KASG** and this Code of Conduct ("Code" or "Policy"). If your performance does not meet position requirements, you may be subject to disciplinary action, up to and including immediate termination, with or without notice, and with or without cause at any time.

### PURPOSE:

The **KASG** Employee Code of Conduct Policy outlines our expectations regarding employees' behaviour towards their colleagues, supervisors, and the overall organization. We promote freedom of expression and open communication, but we expect all employees to follow our Code of Conduct. They should avoid offending, participating in serious disputes, and disrupting our workplace. We also expect them to foster a well-organized, respectful, and collaborative environment.

### SCOPE:

This Policy applies to all our employees, regardless of employment agreement or rank.

### VIOLATIONS WHICH ARE CONSIDERED AGAINST THE CODE OF CONDUCT:

While discipline for standard violations will follow a progressive disciplinary procedure, **KASG** reserves the right to implement discipline in accordance with the grievousness of the violation. Violations of these or any other **KASG** policies may subject you to disciplinary action, up to and including immediate termination:

- Theft, fraud, embezzlement, or other proven acts of dishonesty.
- Any harassment of another employee (verbal, physical, or visual), including sexual harassment such as offensive gestures, unwelcome advances, jokes, touching, or comments of a sexual nature made to or about another employee, vendor or customer.
- Obtaining employment or promotion on the basis of false or misleading information.
- Soliciting or accepting gifts (money, services, or merchandise) in connection with **KASG** business.
- Reporting for work under the influence of alcohol or any illegal substances; or possession, sale or distribution of alcohol or illegal substances while on **KASG** premises or abusing such items while representing **KASG** or conducting **KASG** business.
- Engaging in unauthorized employment elsewhere while on paid benefits related to illness, or while on an extended absence.
- Assisting anyone who you know or suspect to be involved in committing any crime or engaging in any conduct which rises to the level of a crime.
- Falsifying **KASG** documents or records, including misuse of timekeeping records, or falsely inputting payment data.
- Insubordination, meaning refusing to follow legitimate instructions of a superior directly related to performance of one's job.

### ANY EXPECTATIONS : **KASG** expects you to:

- be present at work as required.
- maintain agreed standards of performance.
- comply with health and safety policies and procedures.
- comply with all lawful and reasonable instructions.

**EMPLOYEE'S EXPECTATIONS:** **KASG** has an obligation to behave in a fair and reasonable manner towards employees by acting in compliance with its legal commitments and human resource policies.

These include:

- impartial and open selection and appointment procedures
- clear statements of duties and expectations
- regular and appropriate communication and feedback about work performance
- fair rates of remuneration for competence, responsibilities and performance
- a safe and healthy workplace and work processes
- good working conditions including freedom from harassment or discrimination
- appropriate training and equipment
- equal employment opportunities
- opportunities for development

## RESPECT FOR EACH INDIVIDUAL :

We all deserve to work in an environment where we are treated with dignity and respect. **KASG** is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste. **KASG** is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her superior or to human resources. All employees are also expected to support an inclusive workplace by adhering to the following conduct standards:

- Treat others with dignity and respect always.
- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive or unwelcome.
- Foster teamwork and employee participation, encouraging the representation of different employee perspectives.
- Seek out insights from employees with different experiences, perspectives, and backgrounds.
- Avoid slang or idioms that might not translate across cultures.
- Support flexible work arrangements for co-workers with different needs, abilities and/or obligations.
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.

**KASG** will not tolerate discrimination, harassment or any behavior or language that is abusive, offensive or unwelcome.

**NO FALSE ACCUSATIONS :** As much as we encourage honest reporting, we do not tolerate knowingly false reports. Making a false accusation can divert investigatory resources away from credible good-faith concerns and damage morale. Report when you have a reasonable good-faith belief to be true, but never knowingly make a false accusation, lie to investigators, or refuse to cooperate in an investigation, as these actions may also violate our Code.

**THIRD PARTY CODE OF CONDUCT :** Before entering into any business relationship, the company conducts a comprehensive due diligence process to assess third parties, which includes a sanctions check online at US Office of Foreign Assets control (<https://ofac.treasury.gov>), background checks on their history, reputation, and practices related to anti-corruption and anti-bribery, followed with legal KYC supervision during the transaction process.

**WHEN A CODE VIOLATION OCCURS :** When one of our employees fails to follow our Code or applicable laws, ignores someone else's failure to follow the Code or pressures someone else to violate the Code, a violation has occurred. This can harm **KASG's** reputation and our bottom line. We take all potential Code violations seriously. Code violations may lead to disciplinary action that matches the nature and circumstances of the violation, up to and including suspension without pay, loss of merit increases or annual incentives, and termination of employment. If an act violates the law, it could result in fines or criminal prosecution. Code violations are also documented in your employee record. **KASG** has other policies and processes governing performance, conduct and behavior. Policy violations that are not Code violations will be handled under the appropriate policy or procedure.

**REPORTING :** Any concerns, queries, reporting, complaints and questions regarding the policies of **KASG** are to be addressed and written to Compliance team email – **Capt.kumar@kasgoilpetrochem.com**.

Oil And Petroleum



## CONFLICTS OF INTEREST POLICY

**POLICY STATEMENT:** All employees of **KASG OIL & PETROCHEM INDIA** (hereinafter referred to as **KASG**) are required to perform the duties and activities of their position with the highest level of integrity and independence, in a professional and ethical manner. They must also ensure that they avoid or eliminate any conflict of interest or situation that could reasonably be perceived as a conflict of interest and immediately report it to their superior. Although this policy details certain behaviors that may lead to a conflict of interest or the appearance of a conflict of interest, it is impossible to anticipate all situations that could lead to one. Employees may also inadvertently find themselves in a situation that leads to or could be perceived as a conflict of interest. These situations must also be disclosed. Compliance with this policy is a condition of employment. Failure to comply with these provisions may result in disciplinary action, up to and including termination of employment.

**SCOPE:** This policy applies to all employees of **KASG**, as well as contractual third parties or partners doing business with the company. All are expected to abide by the provisions of this policy that are reasonably applicable to them.

### 1. ACTION OR BEHAVIOURS TO AVOID

The following situations, behaviors or events should be avoided at all costs by employees, managers or other contractual third parties doing business with the company.

#### 1.1 PERSONAL INTEREST

Employees must ensure that no conflict exists or could appear to exist between their personal interests and those of the company, potential competitor, customer, partner, vendor, supplier or other business entity in which they have a direct or indirect financial interest.

Employees must not:

- Take part in or attempt to influence any company decision or any business dealings with a current or potential competitor, customer, partner, vendor, supplier or other business entity in which they have a direct or indirect financial interest
- Use the premises, equipment, supplies or services of other employees of the company to promote their personal interests;
- Use confidential information for their personal benefit during or after employment with the company;
- To be in a position where they could benefit directly or indirectly from a company business transaction (e.g. supplier of goods or services, contract, license or partnership);
- Give preferential treatment to any supplier or other person doing business with the company in order to serve their personal interests;
- Invest in, own, have an interest in, or be an employee of an organization that might have an interest, direct or indirect, in any **KASG** commercial transaction, except in the case of a widely held public company whose dealings with **KASG** do not represent a substantial portion of its total business;

This should not be interpreted as an exhaustive list of all circumstances that could lead to a real or perceived conflict of interest.

#### 1.2 FAMILY, FRIENDS AND ROMANTIC RELATIONSHIPS

Employees and managers must not:

- Use their position or contacts to promote their personal interests or those of a family member or person with whom they have a close personal or professional relationship;
- Take part in or attempt to influence any company related decision or business dealings (including those concerning current or potential customers, partners, vendors or suppliers) that may benefit or appear to benefit a relative, close personal friend or a business enterprise in which a relative or close personal friend is involved or has a direct or indirect financial interest.
- **KASG** generally does not permit work situations where a manager directly or indirectly manages a relative or a person with whom he/she has a romantic relationship. If you are aware that the company plans to hire your relative or a person for a position with whom you have a romantic relationship that directly or indirectly reports to you, you must disclose that information immediately.
- If, during the course of your employment, a romantic relationship develops between you and another employee within your direct or indirect reporting chain,
- you both must promptly disclose that information. Although employees involved in a consensual relationship are individually responsible for disclosure, a
- manager's failure to report such a relationship will be grounds for appropriate disciplinary action.



### 1.3 RELATIONSHIPS AND FAVOURITISM

Employees shall not grant or appear to grant preferential treatment to a person with whom they have a close personal or professional relationship. In some situations, past relationships may also give rise to a perceived conflict of interest and should be treated as such. If an employee is in a situation where he or she could make a decision (e.g. hiring, evaluation, discipline, promotion, reward, any other form of discretionary control or the awarding of a contract) involving, directly or indirectly, a person with whom he or she has a close personal or professional relationship, the employee must disclose the potential conflict to his/her superior.

In addition, if an employee is in a position of authority over a person with whom he or she has a close personal or business relationship, the manager must change the hierarchical relationship between the employee and that person. The manager may also take other measures to reduce the appearance of conflicts of interest, if necessary.

### 1.4 OUTSIDE BUSINESS ACTIVITIES

Employees are permitted to engage in outside employment or activities as long as they inform their superior prior to starting such activity, and to the extent that;

- It does not compete with or reflect adversely on the company or give rise to a conflict of interest;
- It does not engage in any outside activity that is likely to involve disclosure of the company's proprietary information or that is likely to divert time and attention from their responsibilities.
- It could not be reasonably perceived as compromising the integrity, independence and impartiality expected from the company or bring **KASG** into disrepute;
- It does not inappropriately exploit the employee's connection with **KASG**
- It does not restrict the employee's availability or efficiency;
- It does not involve acting as a spokesperson for another organization;
- Employees are permitted to act as board members of an organization external to **KASG** if their participation meets the criteria above, and if authorized by a Director of **KASG** in writing beforehand. An employee cannot serve as a board member or technical advisor of a competitor or of a company that may reasonably be expected to become a competitor
- Employees may be permitted to write books or work on other creative projects that are not in competition with the company as long as they respect the criteria for outside activities mentioned above and obtain prior written authorization from **KASG**

You are not required to seek approval of the following activities:

- Any affiliation with a trade association, professional association or other such organization related to your work or position at the company.
- Participation in non-profit civic or charitable activities, including serving as a member of a board of directors or technical advisory board. However, you must obtain approval if the entity is a **KASG** customer or expects to receive or seek a contribution from **KASG**
- Positions with co-op boards, condominium associations and similar entities where the sole purpose of such participation would be to hold title to and/or manage real property in which you can or do reside.

#### SCOPE:

The scope of this Policy and Procedure applies to every employee of **KASG** including senior executive and financial officers, and to members of our Board of Directors, and reflects the standard to which the company expects its business associates, partners, agents, contractors, and consultants to adhere to when acting on the company's behalf. This Policy is intended to supplement all applicable laws, rules, and other corporate policies.

#### RESPONSIBILITY & ACCOUNTABILITY:

It is the responsibility of the Executive Leadership Team and the designated officer to ensure the following Procedure is adhered to. The Team shall review this Policy on an annual basis for appropriateness, compliance internally with the company and for compliance with all applicable standards, acts, legislation, etc. Requests for additional guidance or interpretation regarding this Policy can be directed to the Team or designated officer. It is the responsibility of all Senior Management and Department Managers to ensure the functionality and accuracy of this Procedure is adhered to. It is the responsibility of every employee to ensure the functionality and accuracy of this Procedure is adhered to. It is the responsibility of the Team and the designated officer to ensure that a risk assessment and due diligence are conducted prior to the appointment of a third-party intermediary.

#### DEFINITIONS:

Corruption: Corruption is the abuse of entrusted power for private economic gain. This Policy will refer to both as "Bribery."

Bribery: Bribery is the giving, offering or agreeing to provide benefits to others in order to improperly influence an outcome to obtain or retain an advantage. Bribery can take many forms, including the provision or acceptance of:

- phony jobs, shell companies, or “consulting” relationships
- kickbacks
- political or charitable contributions
- social benefits, or
- gifts, travel, hospitality and reimbursement of expenses

Company employees are strictly prohibited from offering, paying, promising or authorizing, directly or indirectly, any financial or other advantage or benefit to foreign officials, candidates or parties for the improper performance (whether it be an act, omission, use of influence or otherwise) of a relevant function or activity.

**1. DISCIPLINE:** Any employee who violates the terms of this Policy will be subject to disciplinary action. Any employee who has direct knowledge of potential violations of this Policy but fails to report such potential violations to company Management or the designated officer will be subject to disciplinary action. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment. Any thirdparty agent who violates the terms of this Policy, who knows of and fails to report to company Management or the designated officer potential violations of this Policy, or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.

**2. NOTICE:** All new employees will receive a copy of this Policy when joining the company and will receive an annual reminder.

**3. IMPROPER PAYMENT PROVISIONS:** Any payment or offer of payment to a foreign official for the purpose of influencing that official to assist in obtaining or retaining business or any other advantage for a company is strictly prohibited. A “payment” under the respective bribery and corruption laws is broadly interpreted to include not only the actual payment of money, but also an offer, promise or authorization of the payment of money, as well as an offer, gift, promise or authorization of the giving of “anything of value.” “Anything of value” may include not only cash and cash equivalents, but also gifts, entertainment, travel expenses, accommodations and anything else of tangible or intangible value. Application of the law is not only to payments or offers to pay, but also to any act or event that is “in furtherance of” a payment to a foreign official. Even if an improper payment is not consummated, just offering it violates these laws. Likewise, it is a violation of these laws to instruct, authorize or allow a third party to make a prohibited payment on the company’s behalf, or to ratify a payment after the fact, or make a payment to a third party while knowing or having reason to know that it will likely be given to a government official.

**4. BRIBERY OF FOREIGN OFFICIALS:** It is prohibited for the company and any of its employees, officers, directors and agents to directly or indirectly influence (with money, gifts, or promise) any foreign government, official, political party or political candidate in order to assist the company in obtaining or retaining business or in directing business to any other person. The company also proscribes the authorization or ordering of any practice which constitutes a violation of these prohibitions.

**5. BOOKS & RECORD KEEPING REQUIREMENTS:** In addition to its improper payment provisions, certain accounting requirements are imposed on a company. Specifically, it is required that a company maintains books, records and accounts that, in reasonable detail, accurately reflect the transactions and dispositions of that company. In order to comply with these requirements, it is imperative that company employees, officers and agents maintain complete and accurate records with respect to all transactions undertaken on behalf of the company. These requirements apply to transactions of any amount, not just sums that would be “material” in the traditional financial sense. “Records” include virtually all forms of business documentation, including accounts, correspondence, memos, tapes, discs, papers, books and other documents or transcribed information of any type.

**6. IMPROPER USE OF CORPORATE FUNDS OR ASSETS:** The following uses of corporate funds or assets are prohibited:

- Direct or indirect payments, gifts, contributions or offers or promises of anything of value in bribes, payoffs or kickbacks or any other effort to buy favors, including but not limited to inducements to procure orders for the sale of company services and products. Any other direct or indirect payment, gifts, contribution or offer or promise of anything of value may be made only to the extent that it conforms with reasonably prudent practice in the industry, as approved in each specific case by the designated officer of the company. The giving of lawful customer discounts and allowances in the ordinary course of business is not prohibited, provided that such discounts and allowances are properly approved, documented, and accounted for.
- Commissions, fees, or similar payments which are not reasonably related in value to the services rendered, or commissions, fees or similar payments made in exchange for services rendered which are illegal or in any manner violate this Policy.
- Direct or indirect contributions of money, property, or resources to the campaign of a candidate for office in the Federal Government or in any national political party, other than as permitted by law.
- Use of assets, funds or resources of the company by employees or members of their family, which is personal, or not in furtherance of the business of the company

## WHISTLEBLOWER POLICY

**POLICY STATEMENT:** **KASG OIL & PETROCHEM INDIA** (hereinafter referred to as **KASG**) is committed to conducting its business with honesty and integrity at all times. If, at any time, this commitment is not respected or appears to be in question, KASG will endeavour to identify and remedy such situations. Therefore, it is the company's policy to ensure that when a person has reasonable grounds to believe that an employee, manager or any other person related to the company has committed, or is about to commit, an offence that could harm the company's business or reputation, it denounces the wrongdoers in question.

The whistleblowing policy has been put in place to:

- Encourage employees, partners or managers to disclose this information or behaviour;
- Protecting complainants from reprisals;
- Treated all parties to an investigation in a fair and equitable manner;
- To ensure confidentiality as much as possible;
- Take corrective and disciplinary action if wrongdoing is discovered.

**PURPOSE:** The purpose of this whistleblowing policy is to encourage current and former employees, contractual third parties or partners to communicate events that raise serious concerns about the company. KASG encourages and will support staff who report illegal practices or individuals who violate the company's policies.

**SCOPE:** This policy applies to all employees of KASG as well as contractual third parties or partners doing business with the company.

### 2. DUTY TO REPORT MISCONDUCT

It is the duty of all employees, contractual third parties or partners to report misconduct or suspected misconduct, including fraud and financial impropriety to the board. This includes misconducts such as but not limited to:

- Providing false or misleading information, or withholding material information on **KASG** financial statements, accounting, auditing or other financial reporting fraud or misrepresentation;
- Pursuit of material benefit or advantage in violation of **KASG**'s Conflict of Interest Policy;
- Misappropriation or misuse of **KASG** resources such as funds, supplies or other assets;
- Unauthorized alteration or manipulation of computer files;
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of law or regulations or otherwise obstructing, influencing, or impeding any official proceeding, in violation of the law or regulations;
- Violations of laws that could result in fines or civil damages payable by the company or that could otherwise significantly harm **KASG** reputation or public image;
- Unethical business conduct in violation of any company policies and/or the **KASG** Code of Conduct;
- Danger to the health, safety, or well-being of employees and/or the general public;
- Forgery or alteration of documents;
- Authorizing or receiving compensation for goods not received or services not performed, or paying for services or goods that are not rendered or delivered;
- Authorizing or receiving compensation for hours not worked;
- Embezzling, self-dealing, or otherwise obtaining an unlawful private benefit (i.e., company assets being used by anyone in the organization improperly for personal gain).

### 3. ACTING IN GOOD FAITH:

Any person who files a complaint alleging misconduct must act in good faith and have reasonable grounds

to believe that the information disclosed indicates wrongdoing. No employee, third party contractor or partner who makes a denunciation in good faith will be subject to retaliation. Retaliation is any direct or indirect harmful action that threatens a person or is taken against a person who has reported an event or action. Anyone who retaliates against a person who has made a report in good faith is subject to disciplinary action up to and including dismissal. However, making allegations that are deemed unfounded and malicious or knowingly false may result in disciplinary action up to and including termination of employment.

**PROCEDURE:** A complaint may be submitted in writing to a Director of the company. The written statement must include the following information:

- Description of the offence
- Date on which the complainant became aware of the offence
- Name of the person suspected of the offence

**3.1** The declaration must be sent e-mail or by post. The complainant should expect to receive confirmation of receipt of the complaint within five working days.

**3.2** The complainant will not be dismissed, demoted, suspended, threatened, harassed or otherwise discriminated against because of the communication of a genuine concern. Any employee of **KASG** who contravenes this policy when dealing with a complainant may be terminated.

**3.3** A person is not required to prove the truth of an allegation but is required to act in good faith and provide sufficient evidence to the person contacted to demonstrate that there are sufficient grounds for concern. The number of contacts between the complainant and the investigative body will depend on the nature of the question and the clarity of the information provided. The investigative body may request additional information from the complainant.

**3.4** All complaints will be treated in a confidential and sensitive manner. In addition, the complainant must be able to remain anonymous, except in cases where the nature of the disclosure and/or resulting investigation makes it necessary to disclose his or her identity (e.g. investigations or judicial proceedings). In such cases, all reasonable measures must be taken to protect the complainant from any prejudice resulting from a disclosure.

**4. INVESTIGATION:** All relevant cases, including suspicious but unproven cases, will be reviewed and analyzed by a competent person designated by a Director of the company. In some cases, this may involve an investigation by a legal adviser or an accountant. All investigations will be kept confidential to the extent possible. Appropriate corrective action will be taken, if necessary, and the findings will be communicated to the whistleblower and his or her superior.

**5. REPORTING:** Any concerns, queries, reporting, complaints and questions regarding the policies of **KASG OIL & PETROCHEM INDIA** are to be addressed and written to Compliance team email – [Capt.kumar@kasgoilpetrochem.com](mailto:Capt.kumar@kasgoilpetrochem.com)



## HUMAN RIGHTS POLICY

### 1. Commitment to Human Rights

**KASG OIL & PETROCHEM INDIA** (hereinafter referred to as **KASG**) is committed to upholding and respecting human rights as outlined in international standards, including the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. **KASG** recognizes that promoting and protecting human rights is fundamental to its business operations and sustainability.

### 2. Scope

This policy applies to all **KASG** employees, contractors, vendors, and partners engaged in activities on behalf of **KASG**. It encompasses **KASG**'s operations globally and expects adherence to human rights principles in all business activities.

### 3. Principles

**Non-Discrimination:** **KASG** prohibits discrimination based on race, color, gender, religion, sexual orientation, disability, age, or any other characteristic protected by applicable laws and regulations.

**Labor Standards:** **KASG** respects and supports the rights of employees to fair wages, reasonable working hours, safe working conditions, and freedom of association.

**Child Labor and Forced Labor:** **KASG** prohibits the use of child labor and forced labor in all its operations and expects the same from its suppliers and contractors.

**Health and Safety:** **KASG** is committed to providing a safe and healthy work environment for all employees, contractors, and visitors.

**Freedom of Expression:** **KASG** respects the rights of employees to freedom of thought, expression, and association, as long as it does not infringe upon the rights of others or **KASG**'s legitimate business interests.

#### Implementation

**Training and Awareness:** **KASG** provides training to employees and contractors to raise awareness about human rights issues and their responsibilities under this policy.

**Monitoring and Compliance:** **KASG** monitors compliance with this policy through regular audits and assessments. Employees are encouraged to report any violations or concerns.

**Remediation:** **KASG** will take appropriate corrective actions in response to any violations of this policy, including disciplinary action up to and including termination of employment or termination of contracts with suppliers or partners.

### 1. Communication

This policy is communicated to all employees, contractors, and business partners. **KASG** encourages open dialogue and collaboration with stakeholders to promote respect for human rights.

### 2. Review

This Human Rights Policy will be reviewed periodically to ensure its effectiveness and relevance. Updates and improvements will be made as necessary to align with evolving best practices and legal requirements.

### 3. Reporting Concerns

Any concerns, queries, reporting, complaints, and questions regarding **KASG OIL & PETROCHEM INDIA** Human Rights Policy should be addressed to the Compliance tea

## LABOR LAW POLICY

### 1.Compliance and Commitment

**KASG OIL& PETROCHEM INDIA(KASG)** is committed to upholding labor laws and regulations applicable in the INDIA We ensure that all employment practices and policies comply with INDIA labor laws, including those related to recruitment, working hours, wages, and employee rights.

### 2. Employee Rights

**KASG** respects the rights of employees as guaranteed by INDIA labor laws, including non-discrimination, fair treatment, and protection from harassment or abuse. We provide fair wages and benefits in accordance with INDIA standards and ensure transparency in all employment-related communications.

### 3. Working Conditions

**KASG** is committed to providing a safe and healthy working environment for all employees. We adhere to occupational health and safety regulations, conduct regular risk assessments, and implement necessary measures to mitigate workplace hazards.

### 4. Recruitment and Employment Practices

**KASG** follows fair and transparent recruitment practices, ensuring equal opportunities for all candidates based on merit and qualifications.

### 5. Grievance Mechanism

We maintain an accessible grievance mechanism for employees to raise concerns or complaints related to their employment. **KASG** handles grievances promptly and confidentially, ensuring no retaliation against employees who use this mechanism.

### 6. Training and Awareness

**KASG** provides regular training and awareness programs to employees regarding their rights, responsibilities, and the company's commitment to labor law compliance.

### 7. Monitoring and Review

We monitor our compliance with INDIA labor laws regularly and review our policies and practices to ensure alignment with current regulations and best practices.

## ANTI-SLAVERY POLICY

### 1. Commitment

**KASG OIL & PETROCHEM INDIA (KASG)** is committed to preventing slavery and human trafficking in all its forms within its operations and supply chain. We uphold the principles of human rights and ethical business practices, in alignment with international standards and INDIA laws.

### 2. Prohibition of Slavery and Human Trafficking

**KASG** strictly prohibits slavery, forced labor, and human trafficking in any part of its business operations. We do not tolerate any form of forced labor, involuntary servitude, or human trafficking within our workforce or supply chain.

### 3. Supply Chain Responsibility

**KASG** conducts due diligence on suppliers to ensure they share our commitment to preventing slavery and human trafficking. We expect our suppliers and business partners to adhere to ethical standards and comply with applicable laws and regulations related to slavery and human trafficking.

### 4. Reporting Concerns

Employees, contractors, and stakeholders are encouraged to report any concerns related to slavery or human trafficking promptly and confidentially.

**KASG** investigates all reported concerns and takes appropriate action against any violations of this policy.

### 5. Training and Awareness

**KASG** provides training to employees and contractors to raise awareness about the risks of slavery and human trafficking and their role in preventing these abuses.

### 6. Compliance and Review

This policy is reviewed regularly to ensure its effectiveness and compliance with INDIA laws and international standards. **KASG** is committed to continuous improvement in our efforts to combat slavery and human trafficking.

## ANTI BRIBERY POLICY

Bribery and corruption erode trust, hinder economic development, and compromise ethical business practices. At **KASG OIL & PETROCHEM INDIA(KASG)** we are committed to ensuring all business dealings are conducted fairly and transparently.

### 1.Prohibition of Bribery

**KASG OIL & PETROCHEM INDIA(KASG)** maintains a zero-tolerance policy for bribery and corruption. Employees, managers, and representatives of **KASG** are strictly prohibited from:

- Offering, giving, soliciting, or accepting bribes or other improper payments, whether directly or indirectly, to secure an unfair business advantage.
- Engaging in any corrupt practices, such as kickbacks, facilitation payments, or conflicts of interest that could compromise the company's integrity.

This prohibition extends to dealings with public officials, private organizations, and any other parties associated with **KASG**.

### 2. Reporting of Suspected Incidents

Any employee, contractor, or stakeholder with reasonable grounds to believe that bribery, corruption, or unethical conduct is occurring or is likely to occur must promptly report the matter. Reports should be made to the designated compliance officer or through confidential reporting channels established by **KASG**.

### 3. Training and Awareness

To ensure adherence to this policy, **KASG** provides regular training programs for employees, contractors, and other stakeholders. These programs:

- Educate participants on anti-bribery laws and the consequences of non-compliance.
- Highlight common forms of bribery and corruption, equipping individuals with the knowledge to recognize and address unethical practices.
- Reinforce the company's commitment to ethical standards and the importance of personal accountability.

### 4. Enforcement and Consequences

Violations of the Anti-Bribery Policy are taken seriously and may result in:

- Disciplinary action, including termination of employment or contracts.
- Reporting of incidents to relevant authorities for legal proceedings.

**KASG** ensures that enforcement measures are applied consistently and fairly to uphold its commitment to integrity



## CHILD LABOUR POLICY

Child labor deprives children of their rights, hinders their development, and perpetuates cycles of poverty.

**KASG OIL & PETROCHEM INDIA (KASG)** is firmly committed to eradicating child labor in all forms within its operations and supply chain.

### 1. Strict Compliance with Laws

**KASG** adheres to all international and local laws and regulations regarding the minimum working age and child labour. The company ensures that:

- No individual below the legal working age is employed in any capacity within its operations.
- Suppliers, contractors, and business partners comply with applicable laws and regulations related to child labour.

### 2. Zero Tolerance for Child Labor

The use of child labor is strictly prohibited in any part of **KASG** operations or supply chain. This includes:

- Direct employment of underage individuals.
- Indirect involvement through suppliers, contractors, or other business partners.

**KASG** requires all associated parties to uphold this principle, ensuring that no child is subjected to exploitative labor practices.

### 3. Supplier and Contractor Responsibility

**KASG** works closely with suppliers, contractors, and business partners to promote ethical labour practices. To this end:

- All suppliers and contractors must agree to comply with **KASG** Child Labour Policy as a condition of doing business.
- Contracts include provisions requiring adherence to child labour laws and regulations.
- Non-compliance may result in the termination of agreements or partnerships.

### 4. Monitoring and Auditing

To ensure adherence to this policy, **KASG** conducts regular monitoring and auditing of its operations and supply chain. This includes:

- Conducting risk assessments to identify areas of vulnerability to child labour.
- Engaging third-party auditors to evaluate compliance with ethical labour practices.
- Implementing corrective actions promptly in cases of non-compliance.

### 5. Shared Responsibility

**KASG** recognizes that preventing bribery, corruption, and child labour requires collective action. By fostering a culture of transparency, accountability, and ethical responsibility, we aim to:

- Set a benchmark for ethical business practices.
- Contribute to the elimination of exploitative labour practices globally.

### Compliance and Review

This policy is subject to regular review to ensure its continued relevance, effectiveness, and alignment with applicable laws and best practices. **KASG** is committed to:

- Continuously improving its efforts to combat bribery, corruption, and child labour.
- Adapting to emerging challenges and evolving legal standards.
- Engaging with stakeholders to refine and strengthen its policies and practice

At **KASG OIL & PETROCHEM INDIA(KASG)**, we believe that integrity and respect for human rights are the foundation of sustainable business success. By adhering to this Anti-Bribery and Child Labour Policy, we affirm our commitment to fostering an ethical, transparent, and socially responsible business environment. Together, we can create a positive impact on society and set a standard for others to follow.



Authorized Signature: \_\_\_\_\_ Print Name and Title: AMIT KUMAR, DIRECTOR Date:15/10/2025

Oil And Petroleum

