

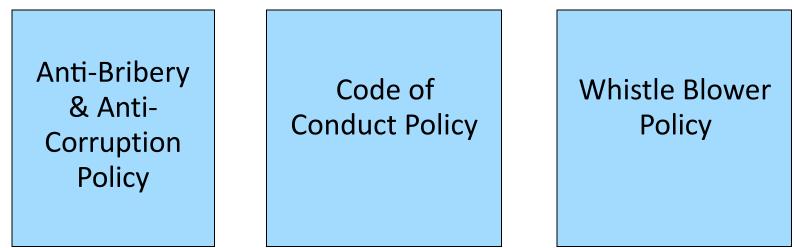


BUSINESS ETHICS AND COMPLIANCE PROCEDURES



Business Ethics

KVGGN is committed to upholding the highest standards of business integrity and ethics. The company implements a comprehensive ethics awareness training program for all employees and vendors.



The employees of the Company have undertaken Business Ethics/ Integrity Training and have confirmed their understanding about the Company's Business Integrity Policies.

Please click on the below link to view the policies on the website of the Company:

https://www.kvggn.in



Business Ethics

Number of Complaints with respect to Business Integrity

Nature of Complaints	Complaints Received
Bribery & Corruption	Nil
Whistle Blowers	Nil
Violation of Code of Conduct Policy	Nil

The Company maintains the following registers, which are presented to the Audit Committee at each quarterly meeting.

Name of Business Integrity Risk Registers	Entries in Register as per Policy Requirements
Fraud and Corruption Register	Nil
Conflicts Register	Nil
Gifts Registers	Nil
Directorship Registers	Nil



Compliance Procedures

The Company has implemented a compliance framework to ensure adherence to its obligations.

Scope, Coverage, and Frequency of the Business Integrity Training Programme:

The Business Integrity Training Programme is an annual online, comprehensive training designed to address all relevant aspects of the Company's Business Integrity Policies. The training is conducted by KVGGN Synergy Private Limited and covers the following key policies:

- Anti-Bribery & Anti-Corruption Policy
- Code of Conduct Policy
- Whistleblower Policy

Methodology: The training is delivered through a combination of audio-visual and classroom business integrity compliance sessions. All employees are required to undergo the audio-visual training to gain an in-depth understanding of the Company's Business Integrity Policies. New hires are also mandated to complete this training alongside their classroom induction sessions.

Upon successful completion of the training, employees must undertake an assessment. A certificate is then issued, including the employee's credit score, to formally acknowledge their participation and understanding of the training.

"By completing the test successfully, you confirm your dedication to maintaining the highest standards of business integrity and compliance."



"Details of the Business Ethics/Business Integrity Training Program

Statistics as of 1st October 2024"

Number of employees eligible for the training and assessment	100
Number of employees who have completed the training and assessment	100
Pass percentage	95
Number of employees who have passed	95
Number of employees who have scored 100	30
Number of employees who have failed and eligible for retest	05
Topics covered	Anti-Bribery & Anti-Corruption Policy Code of Conduct Policy Whistle Blower Policy



Template of the Business Integrity Training programme Certificate



Certificate of Completion

This is to certify that

< Name of the employee >

Has successfully completed the Business Integrity Training conducted by

KVGGN Synergy Private Limited

Course Credit: ____%

Awarded: <DD/MM/YYYY>

BY Successfully completing the test, you testify that you are committed to the

highest standards of business integrity and compliance

Chief Compliance Officer

MD & CEO