

LUCKY HORZE

Global Operational Compliance & Governance Framework

Document Control No:	LH-GRP-GOV-2025-v2
Initial Adoption Date:	January 15, 2025
Last Annual Review:	January 10, 2026
Document Custodian:	Office of the Founder & Operations
Scope:	Universal (Enterprise Operations, Engineering, Field Networks, Sub-processors)
Website:	www.luckyhorzeai.com

Section 1: Corporate Mission & Operating Philosophy

Lucky Horze was established on the principle that scalable, cutting-edge artificial intelligence and multimodal data engineering require uncompromised ethical foundations. As an India-based technology and data operations enterprise serving global clients (learn more at www.luckyhorzeai.com), we balance high-throughput delivery with stringent adherence to Indian jurisprudence, international statutory standards, and human-centric operational ethics.

This Framework constitutes our master operational policy. It defines mandatory business conduct across all employees, contract engineers, field collection specialists, and technical partners.

Section 2: Workplace Human Rights, Labor Dignity & Fair Engagement

Lucky Horze maintains a zero-tolerance policy against any form of forced labor, bonded labor, involuntary servitude, or child exploitation across all direct and indirect operations.

Statutory Adherence

Operations are conducted in strict compliance with the Constitution of India, the Bonded Labour System (Abolition) Act (1976), the Child and Adolescent Labour (Prohibition and Regulation) Act (1986), the Minimum Wages Act (1948), and relevant State Shops and Commercial Establishments legislation.

Voluntary Labor & Fair Pay

All engagements—whether technical staff or local project associates—are established through executed, transparent written agreements. Wages and professional honorariums meet or exceed local statutory minimums and prevailing market rates.

Document Sovereignty

Workers, contractors, and field participants maintain unencumbered, continuous possession of their original national identification credentials (e.g., Aadhaar cards, PAN cards, passports, voter IDs). Retaining identity papers as collateral or leverage is expressly prohibited.

Ethical Human Participant Protocols

When conducting multimodal, speech, or visual data collection, all human contributors participate on a purely voluntary basis. Transparent informed consent protocols are executed prior to data acquisition, detailing collection scope, data lifecycle, licensing parameters, and the contributor's right to opt out.

Section 3: Financial Probity, Banking Discipline & Anti-Money Laundering

Lucky Horze enforces clear operational controls to safeguard commercial infrastructure against illicit transactions, unauthorized capital movement, and financial crime.

AML Compliance

Our commercial controls comply with the Prevention of Money Laundering Act (PMLA, 2002) and Reserve Bank of India (RBI) Know-Your-Customer (KYC) directives.

Institutional Settlement Only

All client billing, operational disbursements, vendor payments, and collection stipends are conducted exclusively through verified, regulated commercial banking rails. The company does not conduct off-book transactions or maintain unrecorded cash ledgers.

Counterparty Due Diligence

We perform systematic Know-Your-Customer (KYC) and Know-Your-Vendor (KYV) verifications on domestic and cross-border commercial partners to prevent engagement with sanctioned individuals, entities, or jurisdictions.

Section 4: Anti-Corruption, Commercial Integrity & Gift Governance

We compete and conduct business solely on technical capability, delivery reliability, and data quality. We strictly prohibit corrupt payments, extortion, or unethical inducements of any kind.

Legal Standards

Operations adhere to the Prevention of Corruption Act (1988, as amended 2018), the Bharatiya Nyaya Sanhita (BNS) / Indian Penal Code, and the extraterritorial principles of the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

Improper Inducements

Personnel and contractors may not directly, indirectly, or via intermediaries offer, promise, authorize, demand, or accept bribes, kickbacks, or improper benefits to or from government representatives, institutional clients, vendors, or commercial partners.

Facilitation Payments

Expediting or facilitation payments to commercial or public personnel to accelerate routine administrative processes are prohibited.

Hospitality and Token Gifts

Modest, customary corporate hospitality and branded promotional items of nominal market value are permitted solely when transparent, documented, and incapable of influencing objective commercial decisions.

Section 5: Market Integrity, Fair Competition & Intellectual Assets

Lucky Horze champions fair, transparent, and open market competition across the data technology and engineering ecosystem.

Fair Trading

In accordance with the Competition Act (2002) overseen by the Competition Commission of India (CCI), the enterprise operates autonomously. We strictly refrain from horizontal or vertical market-allocation agreements, collusive bidding, predatory tactics, or informal price-fixing cartels.

IP Protection and Trade Confidentiality

Proprietary collection methodologies, client pipeline specifications, datasets, and intellectual property are handled under strict confidentiality protocols. We respect third-party intellectual property and collect/license data strictly under lawful, auditable chains of title.

Section 6: Governance, Reporting Channels & Non-Retaliation

Transparency requires accessible, protected communication channels for reporting irregularities, operational risks, or ethical concerns.

Reporting Inquiries & Incidents

Any team member, external contractor, or commercial stakeholder may report suspected violations of law or internal governance directly to our centralized compliance inbox:

Email: business@luckyhorze.com

Website: www.luckyhorzeai.com

Confidential Escalation: Founder / Compliance Custodian

Non-Retaliation Guarantee

Lucky Horze provides unequivocal protection against adverse administrative, contractual, or professional repercussions for any party submitting a concern in good faith.

Inquiry & Remediation

Reported matters are investigated promptly, impartially, and confidentially. Documented non-compliance results in immediate operational suspension, contract termination, and, where mandated, notification to relevant statutory authorities.

Section 7: Executive Endorsement

This Framework represents the foundational operating mandate of Lucky Horze and is subject to continuous review and mandatory annual recertification.

Pritish Bagdi

Founder & Director

Lucky Horze

Mumbai, Maharashtra, India

www.luckyhorzeai.com

Annual Governance Review Certified: January 10, 2026