

**Re: Complaint Against Code of Conduct of Key Managerial Personnels of LG Electronics India Pvt. Ltd. (CIN U32107DL1997PTC220109) (Company intending an Initial Public Offer).**

2024/12/30 14:49

Tirupati Metals &lt;tscorp@rediffmail.com&gt;

Dear Ms Ahluwalia,

Trailing e-mail, please find attached our reply regarding your letter dt. 17/12/24 and also a letter from LG dt. 20/6/23 in response to our communication to SEBI and lead managers.

With regards,  
For Tirupati Sales Corporation

S. Jalan

From: "JASLEEN AHLUWALIA" <jasleen.ahluwalia@lge.com>  
Sent: Tue, 17 Dec 2024 17:30:33  
To: "Tirupati Metals" <tscorp@rediffmail.com>  
Cc: VIJAY SINGH <vijay.singh@lge.com>, UMESH KUMAR <umesh.kumar@lge.com>, JATIN MUNJALL <jatin.munjall@lge.com>  
Subject: Re: Complaint Against Code of Conduct of Key Managerial Personnels of LG Electronics India Pvt. Ltd. (CIN U32107DL1997PTC220109) (Company intending an Initial Public Offer).

Dear Mr. Sumit Jalan,

Please find attached the response from LG Electronics India Limited to your email dated December 2, 2024 which was addressed to the Securities and Exchange Board of India and the book running lead managers in relation to the alleged conduct of Mr. Mudit Shastri and Ms. Shivani Singh.

For & On behalf of LG Electronics India Limited

----- Original Message -----

From : "Tirupati Metals" <tscorp@rediffmail.com>  
To : JASLEEN AHLUWALIA Team Leader(jasleen.ahluwalia)  
Cc : VIJAY SINGH Department Leader(vijay.singh)  
Date : 2024/12/04 14:47:07 [GMT+05:30]  
Subject : Complaint ( Without Prejudice)

Dear Sir/ Madam,

We take this opportunity to introduce ourselves as one of your Institutional dealers based in Guwahati. We had been induced by few of LG Electronics employees and hence having suffered for almost 17 months now we are awaiting payment which was assured to come in 30-45 days.

There is a team of employees involved but we are highlighting the actions of two of your key employees, notably **Mudit Shastri and Shivani Sharma Singh** and we hope being the HR department you will take the matter seriously. We had put the same in your audit department but to no avail.

Mr. Mudit Shastri, bearing DIN: 10245051, a resident of C 26, Sector 33, Near Prakash Hospital, Noida 201301, is an employee of L G Electronics India Private Limited designated as **Vertical Head- Government Business – LG Electronics**. Once again, in order to understand the corporate malpractices indulged in by Mr. Mudit Shastri, it is important to understand the nexus between the Companies in which Mr. Mudit Shastri had direct/indirect association.

Mr. Mudit Shastri is/was director in the following companies as reflected in the Director Master Data available on the MCA portal :

<b>f Associated Companies</b>					
<b>CIN/FCRN</b>	<b>Company Name</b>	<b>Designation</b>	<b>Original Date of appointment</b>	<b>Date of Appointment at Current Designation</b>	<b>Date of cessation (if applicable)</b>
U46529DL2023PTC417270	ADELFO INTERNATIONAL PRIVATE LIMITED	Director	-	19/07/2023	19/07/2023

Adelfos International Private Limited is a private limited Company bearing **CIN U46529DL2023PTC417270** and having registered office at Flat No. 3015 III, Sector C Vasant Kunj, New Delhi, South Delhi, Delhi, India, 110070. The Board of Directors of **Adelfos International Private Limited** initially consisted of **Mr. Mudit Shastri** and **Mr. Prateek Agarwal (DIN: 09770257)**.

A closer look at the Directorships of Mr. Prateek Agarwal (DIN: 09770257)) will reveal the following:

<b>f Associated Companies</b>					
<b>CIN/FCRN</b>	<b>Company Name</b>	<b>Designation</b>	<b>Original Date of appointment</b>	<b>Date of Appointment at Current Designation</b>	<b>Date of cessation (if applicable)</b>
U46632MP2023PTC066853	IMPERIO ASSOCIATES PRIVATE LIMITED	Director	25/07/2023	25/07/2023	-
<b>U46529DL2023PTC417270</b>	<b>ADELFO INTERNATIONAL PRIVATE LIMITED</b>	<b>Director</b>	<b>19/07/2023</b>	<b>19/07/2023</b>	<b>-</b>
<b>U53520MP2022PTC063146</b>	<b>KINGDOM VENTURE INDIA PRIVATE LIMITED</b>	<b>Director</b>	<b>19/10/2022</b>	<b>19/10/2022</b>	<b>-</b>

As evident from above, **Mr. Mudit Shastri** and **Mr. Prateek Agarwal** were business associates through their directorship in **Adelfos International Private Limited**, which in turn was an associate company of **Kingdom Venture India Private Limited**. Notably **Kingdom Venture India Private Limited** is one of the authorised dealers of **L G Electronics India Private Limited** and is engaged in supply of L G products. Mr. Mudit Shastri, by taking advantage of his position in the Government business vertical of LG Electronics India Private Limited, ensured issuance of Purchase Orders from Kingdom Venture India Private Limited to us from official email id of Deputy Manager, Govt Biz. Department of LG Electronics Private Limited for supply of LG Products to the tune of approximately 2.00 Crores, which in turn was supplied by Kingdom Venture India Private Limited to A. B. Pal

Electricals Private Limited for onward supply to APTS Vijaywada (a nodal agency that offers a wide range of IT related services to all govt departments of Andhra Pradesh since 1986). The total supply was for an amount of almost Rs. 25.00 Crores. As per the initial discussion, the products were to be billed by us directly to A. B. Pal Electricals Private Limited but the supply was made to Kingdom Venture India Private Limited on insistence of Mr. Mudit Shastri along with three other employees namely, Shivani Singh, Pradeep Bayana, Manager (official email id pardeep4.kumar@lge.com) and Roselin Oinam, Deputy Manager (official email address roselin.oinam@lge.com). Notably the margin at which products were billed by us was a meagre 4-7% as against the margin of 34-35% earned by Kingdom Venture India Private Limited against the said supply clearly demonstrating the intent to earn super profits by Mr. Mudit Shastri by taking advantage of information to which he was privy to given his position in the Company.

The supplies against the above Purchase Orders were made vide bills dated 30.06.2023 and 28.07.2023. All this while, Mr. Mudit Shastri continued to be Director in Adelfos International Private Limited. When it came to our attention that Mr. Shastri was serving as a director of **Adelfos International Private Limited**, which was an associate company of **Kingdom Ventures India Private Limited**, the abuse of position was highlighted by us to Mr. Mudit Shastri, and upon becoming aware of the conflict of interest arising from this related party connection, allegedly filed his resignation from his directorial position at **Adelfos International Private Limited w.e.f. 19.07.2023**, likely to mitigate any concerns regarding his professional conduct. It is pertinent to note that Mr. Mudit Shastri was a Director at the time of supply of goods and he retired from the company Adelfos with retrospective effect. This shows his malafide intent.

Again, **Ms. Shivani Sharma Singh** a resident of ATS Advantage Ahinsa Khand-1, Indirapuram, Shipra Sun City, Ghaziabad, U.P. 201014, is also an employee of L G Electronics India Private Limited designated as **National Head-Government Projects – LG Electronics**. Her official e-mail id is shivani.singh@lge.com. In order to understand the corporate malpractices indulged in by Ms. Shivani Sharma Singh, it is important to understand the nexus between the Companies in which Ms. Shivani Sharma Singh had direct/indirect association.

**Yevrox Engineering & Infrastructure Private Limited** is a private limited Company bearing CIN U45400DL2023PTC409798 and having registered office at C-51 Extn Ground Floor New Ashok Nagar, East Delhi, Delhi, Delhi, India, 110096 Incorporated on 11<sup>th</sup> January, 2023, its Board of Directors consisted of, **Mr. Kumar Vishwajeet Singh, Mr. Yatender Singh and Mr. Abhay Kumar Singh**. Surprisingly **Mr. Kumar Vishwajeet Singh** shares the same residential address as that of **Ms. Shivani Singh**, clearly reflecting that there is some relationship between the two persons. Similar to the case of Mr. Mudit Shastri, in this case too, **Mr. Kumar Vishwajeet Singh** ceased to be one of the directors of **Yevrox Engineering & Infrastructure Private Limited** and was introduced as a director in **JMDSC Private Limited w.e.f 8<sup>th</sup> January, 2024**, followed by one **Ms. Puja Singh** joining **Yevrox Engineering & Infrastructure Private Limited w.e.f. 4<sup>th</sup> January, 2024** as a director.

The Board of Directors of JMDSC Private Limited comprises of Mr. Kumar Vishwajeet Singh, Ms. Puja Singh and Mr. Abhay Kumar Singh. As is evident, there are two directors in common on the Board of Yevrox Engineering & Infrastructure Private Limited and JMDSC Private Limited, that is, Ms. Puja Singh and Mr. Abhay Kumar Singh, implying that these companies are associate companies under common control. We suspect that Ms. Shivani Singh is also related to Ms. Puja Singh and/or Mr. Abhay Kumar Singh. Notably, Yevrox Engineering & Infrastructure Private Limited is also one of the suppliers who supplied materials to the Andhra Pradesh Government through APTS.

Such business arrangement by key employees of LG Electronics India Private Limited appears to be a deliberate attempt to channel business indirectly by taking advantage of their positions in the subject Company. Such conflict of interest and misuse of authority for personal profit by **key employees of the Company** is a serious breach of ethical conduct and raises concerns about the integrity of internal practices at **L G Electronics India Private Limited**.

We hope you have understood the manner in which these people were involved in the deal and we are sceptical of other deals that might have taken place. Such unethical conduct is not acceptable in such an esteemed organization and demeans the high standards of a company such as LG Electronics which is about to launch its IPO in the Indian market.

The above is for your information and taking appropriate action with regards to your company policy so that it is a deterrent for others who would be willing to indulge in such activities.

With warm regards,  
For Tirupati Sales Corporation

S. Jalan  
+91 9864062700