

GHCL LIMITED

BRSR POLICY – 4: STAKEHOLDER'S ENGAGEMENT



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[Regulation 34(2) (f) of SEBI Listing Regulations, 2015)

1. Philosophy:

GHCL Limited believe in the principle that the interest of all stakeholders must be protected and at the same time, company must be responsive towards them, especially those who are disadvantaged, vulnerable and marginalised. GHCL Limited believe that stakeholder engagement leads to increased transparency, responsiveness, compliance, organisational learning, quality management, accountability and sustainability.

2. Scope: This Policy is applicable to all the business divisions of the GHCL Limited.

3. Policy:

- a. The Company shall identify their stakeholders, understand their concerns, define purpose and scope of engagement and commit to engage with them.
- b. The company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- c. The company shall strive to give special attention to stakeholders in areas that are underdeveloped.
- d. The company shall resolve differences with stakeholders in a just, fair and equitable manner.





4. Implementation:

- i. The Policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company's intranet.
- ii. The Managing Director, through the Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the Policy is implemented throughout the Company.
- iii. Compliance with the Policy shall be monitored and evaluated by the Company Secretary on a regular basis.
- iv. Any grievances/ complaints with respect to violation of the Policy shall be reported to the Company Secretary.
- v. The Stakeholders Relationship Committee constituted by the Board of Directors, under Section 178(5) of the Companies Act, 2013, shall consider and resolve the grievances of the stakeholders.
- vi. Company Secretary shall report the non-compliance of the Policy to the Board of Directors or duly constituted committee of the Board. The Board / Committee shall take appropriate action against the wrongdoer.

5. General:

- i. In case of any doubt with regard to any provision of the Policy and also in respect of matters not covered herein, a reference to be made to the Company Secretary.
- ii. Company secretary in consultation with the Managing Director and / or Board of Directors, shall clarify the doubt and communicate the same to the respective person. In case, clarification or doubt is subject matter of Policy then, Company Secretary shall refer the matter to the Board of Directors for their direction. On receipt of direction/ clarification, Company Secretary shall communicate the same to the respective person / division.





6. Modification / Amendment in the Policy:

Any or all provisions of this Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, or Ministry of Corporate Affairs or SEBI and / or any other statutory authorities, from time to time.

7. Change Log:

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|----|---|-----------------------|
| 1. | Type of Document | Policy |
| 2. | Recommended by Audit & Compliance Committee | May 20, 2017 |
| 3. | Approved by Board of Directors | May 20, 2017 |
| 4. | Reviewed by the Managing Director | April 1, 2024 |
| 5. | Document Control | Corporate Secretarial |

For GHCL Limited

**R S Jalan
Managing Director**

