

GHCL LIMITED

BRSR POLICY – 7: RESPONSIBLE ADVOCACY



GHCL Limited

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

1. Philosophy:

GHCL Limited understand that it operates in various diversified sectors which requires consistent, balance and transparent interactions with various regulatory authorities and social organisations. GHCL Limited believe that the engagement with the relevant authorities is guided by the values of commitment , integrity, transparency and the need to balance interest of diverse stakeholders.

GHCL Limited engages with industry bodies and associations to influence public and regulatory Policy in a responsible manner.

2. Scope:

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

3. Policy:

- i. GHCL Limited shall work with industry organisations such as PHD Chambers of Commerce & Industry, FICCI, The Associated Chambers of Commerce & Industry of India (ASSOCHAM) which are engaged in policy advocacy in a responsible manner;
- ii. GHCL Limited shall ensure that advocacy position remains consistent with its values and philosophy;
- iii. GHCL Limited shall ensure that policy advocacy is conducted ethically.





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. Company Secretary shall report the non-compliance of the Policy to the Board of Directors or duly constituted committee of the Board.

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:

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

