

GIRIRAJ CIVIL DEVELOPERS LIMITED

Advocacy Policy

20 November 2025

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ADVOCACY POLICY

1. Purpose

The purpose of this Advocacy Policy is to establish clear principles and guidelines for how **Giriraj Civil Developers Limited** (the “**Company**”) engages with government bodies, regulators, industry associations, communities, and other stakeholders. The policy ensures that all advocacy activities are conducted ethically, transparently, and in alignment with the company’s values of integrity, sustainability, and compliance.

2. Scope

This policy applies to:

- Board of Directors
- Key Management Personnel (KMP)
- Senior Management Personnel (SMP)
- Employees engaged in external representation
- Consultants, advisors, and third parties acting on behalf of the company

3. Guiding Principles

- **Integrity & Transparency:** Advocacy must be truthful, accurate, and free from misrepresentation.
- **Compliance:** All activities must comply with applicable laws, regulations, and industry codes (including Indian Railways/RDSO standards, ISO, and ESG frameworks).
- **Alignment with Corporate Values:** Advocacy must support the company’s mission of sustainable infrastructure development.
- **Non-Partisanship:** The company will not engage in political campaigning or partisan activities.
- **Stakeholder-Centric Approach:** Advocacy must balance the interests of shareholders, employees, customers, communities, and the environment.

4. Objectives of Advocacy

- Promote sustainable infrastructure development aligned with national priorities.
- Support regulatory frameworks that enhance safety, quality, and environmental responsibility.
- Encourage industry-wide adoption of best practices in procurement, project management, and compliance.
- Represent the Company’s perspective in policy dialogues, industry forums, and consultations.
- Strengthen community engagement and social license to operate.

5. Roles & Responsibilities

- **Board of Directors:** Approves advocacy strategy and monitors compliance.
- **Managing Director/CEO:** Leads external representation and ensures alignment with corporate objectives.
- **Compliance & Legal Team:** Reviews advocacy activities for regulatory adherence.
- **Employees & Representatives:** Must act in accordance with this policy when engaging externally.

6. Policy Framework

The Company aims to engage in Policy Advocacy within the following framework:

- ✓ Advocate and support stakeholder consultation and interfacing in the area inter alia covering Governance and Administration, Taxation, Sustainability, Economic & Sector development with an objective of influencing policy, regulations and other decision-making undertakings.
- ✓ Engage responsibly with all government agencies, policy makers, regulators, Chamber of Commerce, Industry Associations and other Stakeholders in a constructive manner to promote areas identified for advocacy.
- ✓ Exhibit professionalism, honesty and integrity, openness and transparency during policy advocacy.
- ✓ Maintain high standard of ethics and comply with all applicable laws and regulations.
- ✓ Provide factual information, knowledge and expertise to the regulators and policy makers.
- ✓ Formulate a grievance redressal mechanism to support the investigation of any instance of non-compliance with the policy.
- ✓ Ensure stance taken during policy advocacy promotes fair competition and respects rights and interest of all stakeholders.

7. Engagement Channels

- Participation in industry associations (e.g., CREDAI, FICCI, CII).
- Submissions to government consultations and regulatory bodies.
- Public forums, conferences, and stakeholder dialogues.
- Community outreach and CSR initiatives.

8. Prohibited Activities

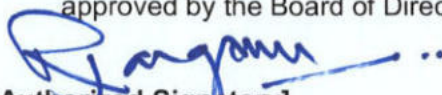
- Political donations or partisan lobbying.
- Misrepresentation of facts or concealment of material information.
- Advocacy that undermines sustainability, human rights, or ethical standards.
- Any activity that could damage the Company's reputation or stakeholder trust.

9. Monitoring & Reporting

- All advocacy activities will be documented and reported to the Compliance Committee.
- Annual review of advocacy outcomes will be conducted as part of the company's ESG and BRSR disclosures.
- Whistleblowing mechanisms will be available for reporting violations.

10. Review & Continuous Improvement

This policy will be reviewed annually to ensure alignment with evolving regulatory requirements, industry practices, and stakeholder expectations. Updates will be approved by the Board of Directors.



[Authorized Signatory]
Giriraj Civil Developers Limited