

GIRIRAJ CIVIL DEVELOPERS LIMITED

Anti-Bribery and Anti-Corruption Policy

20 November 2025

© This document and all associated materials, including but not limited to designs, formats, and templates, are the intellectual property of Giriraj Civil Developers Limited. Unauthorized use, reproduction, distribution, or disclosure of any part of this document is strictly prohibited.

Version Control

File Name: Governance Policy Manual

Version number	Doc. ID	Created by	Reviewed by	Authorized by	Release Date	Remarks
1.0	GPM-10			CEO	20.11.2025	Rev-0

Contact Information

All clarifications and further information regarding the contents of this document can be requested from the following person(s):

- **Office Address:** 2nd Floor, Nine Square, Ramdas Sutrale, Marg, Borivali (W)
- **Office Phone:** +91 22 28906356 / 28702744
- **E-mail:** info@giriraj.co

ANTI BRIBERY AND ANTI-CORRUPTION POLICY

1. Purpose

This policy establishes **Giriraj Developers Limited's** (the “**Company**”) commitment to conducting business with integrity, transparency, and accountability. It prohibits bribery, corruption, and unethical practices in all operations, ensuring compliance with applicable laws and fostering stakeholder trust.

2. Scope

This policy applies to:

- All employees, directors, and officers of the Company
- Contractors, consultants, agents, intermediaries, and joint venture partners
- Suppliers and vendors engaged with the company

3. Policy Statement

The Company maintains a **zero-tolerance approach** to bribery and corruption. No employee or associated person shall:

- Offer, give, solicit, or accept bribes, kickbacks, facilitation payments, or improper advantages.
- Engage in corrupt practices to influence business decisions, government officials, or third parties.
- Conceal or misrepresent transactions to disguise bribery or corruption.

4. Definitions

- **Bribery:** Offering or accepting anything of value to improperly influence decisions.
- **Corruption:** Abuse of entrusted power for private gain.
- **Facilitation Payments:** Small, unofficial payments to expedite routine government actions (strictly prohibited).
- **Conflict of Interest:** Situations where personal interests interfere with professional duties.

5. Guiding Principles

- **Compliance with Law:** Adherence to Indian laws and international anti-corruption conventions.
- **Integrity & Transparency:** All dealings must be honest, fair, and documented.
- **Due Diligence:** Thorough vetting of third parties, suppliers, and contractors.
- **Gifts & Hospitality:** Permissible only if reasonable, proportionate, and not intended to influence decisions.
- **Political & Charitable Contributions:** Allowed only with Board approval and in compliance with law; political donations are prohibited.

6. Responsibilities

- **Board of Directors:** Oversight and approval of policy framework.
- **Compliance Officer:** Monitoring, training, and reporting on anti-bribery measures.
- **Employees:** Mandatory adherence and reporting of suspected violations.

- **Vendors/Partners:** Contractual obligation to comply with this policy.

7. Reporting & Whistleblowing

- Employees and stakeholders are encouraged to report suspected bribery or corruption through confidential channels.
- Whistleblowers will be protected against retaliation.
- Reports will be investigated promptly and fairly, with disciplinary action for violations.

8. Training & Awareness

- Regular training sessions for employees and contractors.
- Awareness campaigns to reinforce ethical practices.
- Annual certification of compliance by employees and key partners.

9. Monitoring & Audit

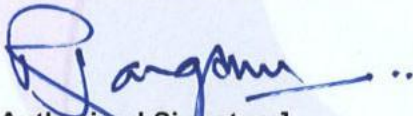
- Periodic internal audits to ensure compliance.
- Risk assessments for high-value contracts and government interactions.
- Continuous improvement through lessons learned and corrective actions.

10. Disciplinary Action

- Violations may result in termination, legal prosecution, and financial penalties.
- Third-party breaches may lead to contract termination and blacklisting.

11. Review & Updates

This policy shall be reviewed annually to incorporate changes in law, regulations, and organizational priorities.



[Authorized Signatory]
Giriraj Civil Developers Limited