



## **GIRIRAJ CIVIL DEVELOPERS LIMITED**

### **Sustainable Supply Chain Policy**

**14 September 2025**

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## SUSTAINABLE SUPPLY CHAIN POLICY

### 1. Purpose

This Policy establishes the standards and expectations for sustainable practices across our entire supply chain.

It drives alignment with global benchmarks and Indian regulatory requirements to ensure responsible sourcing, ethical conduct, and environmental stewardship.

### 2. Scope

This Policy applies to all Supply Chain Partners (**SCPs**), including contractors, sub-contractors, material suppliers, service providers, consultants, agents, technical collaborators and any entities engaged or seeking engagement with the Company.

It covers all goods, services, works and collaborations throughout the procurement lifecycle, from pre-qualification to contract completion.

### 3. Definitions

**“Company”** shall mean Giriraj Civil Developers Limited having its registered office at *Nine Square Terraces, Ramdas Sutrale Marg, off Chandavarkar Lane, Near ICICI Bank, Borivali West, Mumbai: 400 092, Maharashtra, India*

**“Supplier”** shall mean any party providing goods or services to the Company.

**“Sustainable Procurement”** shall mean the process of sourcing goods and services in a way that delivers value for money on a whole-life basis and generates benefits to society and the economy while minimizing environmental impact.

**“Supply Chain Partner (SCP)”** shall mean combined term for supplier, contractor, sub-contractor, consultant and any other entity involved in the value chain.

### 4. International Standards & Legal Framework

#### 4.1 International Standards

Our Supply Chain Policy is to adopt the best practices prescribed under following ISO Standards while procurement of goods and services:

ISO 20400:2017 Sustainable Procurement

ISO 26000:2010 Guidance on Social Responsibility

## Indian Legal Requirements

Our Supply Chain Policy endeavours to minimise the implications on the environment and health & safety of the workers by complying with the below mentioned Acts and Regulations.

Sr. No	Legislation	Scope	Implications
1	Environmental Protection Act, 1986	Pollution Control & Environmental	Mandatory Environmental Safeguards
2	Air (Prevention & Control of Pollution) Act, 1981	Air emissions	Emission standards, consent to operate
3	Water (Prevention and Control of Pollution) Act, 1974	Water discharges	Effluent standards, discharge monitoring
4	Hazardous Waste (Management) Rules, 2016	Hazardous waste handling	Storage, Transport & Disposal Protocols
5	Factories Act, 1948	Workplace health and safety	Safety committees, worker welfare
6	Contract Labour (Regulation and Abolition) Act, 1970	Contract labour oversight	Licensing, wage payment, welfare facilities
7	Building and Other Construction Workers Act, 1996	Construction worker welfare	Health, safety, social security
8	Prevention of Corruption Act, 1988	Anti-corruption measures	Reporting bribes, maintaining integrity
9	Companies Act, 2013 (CSR provisions)	Mandatory CSR expenditure	Project selection, reporting requirements

## 5. Guiding Principles

### 5.1 Compliance & Beyond

Ensure SCPs comply with all applicable statutory and regulatory provisions in India and internationally.

Encourage SCPs to adopt best-in-class practices that exceed baseline requirements.

### 5.2 Ethics & Governance

Publish and enforce a Supplier Code of Conduct that mandates zero tolerance for bribery, corruption and anti-competitive behaviour.

Uphold transparency through clear procurement processes and equitable opportunity frameworks.

### **5.3 Environment & Resources**

Set measurable targets for reduction in greenhouse gas emissions, water consumption and waste generation.

Promote eco-design, use of recycled or low-impact materials, energy efficiency and circular economy principles.

### **5.4 Health, Safety & Human Rights**

Require SCPs to implement occupational health and safety management systems aligned with ISO 45001.

Mandate respect for human rights, prohibiting child labour, forced labour and discrimination in any form.

### **5.5 Diversity & Inclusion**

Encourage SCPs to promote gender balance, workforce diversity and inclusion of under-represented communities.

Incorporate diversity metrics into supplier performance evaluations.

### **5.6 Community & Social Responsibility**

Foster engagement with local communities affected by supply chain activities.

Support livelihood initiatives, skills development and community infrastructure projects in line with Indian CSR rules.

### **5.7 Anti-Corruption & Fair Competition**

Institute pre-contract due diligence and ongoing monitoring to detect and prevent corrupt practices.

Enforce compliance with the Prevention of Corruption Act and global anti-bribery standards.

### **5.8 Continuous Improvement & Capability Building**

Provide training, workshops and digital resources to enable SCPs to strengthen ESG competencies.

Set up joint forums for knowledge sharing and innovation in sustainable solutions.

### **5.9 Monitoring, Reporting & Transparency**

Require periodic self-assessment and third-party verification of ESG performance.



Align disclosures with global frameworks such as GRI, SASB and CDP, and file reports in accordance with Indian regulatory filings when applicable.

## **6. Supplier Selection & Due Diligence**

**6.1 Pre-Qualification** - Assess financial stability, ESG track record and legal compliance history.

**6.2 Risk Assessment** - Categorize suppliers by environmental, social and governance risk factors.

**6.3 Contractual Clauses** - Embed sustainability obligations, audit rights and termination provisions in supplier contracts.

## **7. Performance Measurement & Reporting**

### **7.1 Key Performance Indicators**

Include scope 3 emission reductions, on-time delivery of sustainability training and corrective action closure rates.

### **7.2 Review Cadence**

Quarterly performance reviews with key suppliers; annual public disclosures.

## **8. Capacity Building & Training**

Offer tailored training modules on Indian environmental regulations, human rights due diligence and sustainable procurement best practices.

Encourage SCPs to certify employees in recognized ESG standards and methodologies.

## **9. Non-Compliance & Corrective Actions**

Non-compliance triggers a structured response:

- Issue Notice of Concern with remedial timeline
- Provide technical assistance or third-party support
- Escalate to contract suspension or termination for unresolved violations

## **10. Governance & Review**

The Corporate Sustainability Committee oversees Policy implementation.

Regional procurement leads monitor local adherence and report findings to the Board Sustainability Council.

## 11. Roles & Responsibilities

**Executive Management:** Endorse Policy, allocate resources and set strategic ESG targets.

**Procurement Team:** Execute supplier assessments, contract drafting and performance tracking.

**Sustainability Office:** Develop training materials, coordinate audits and manage reporting platforms.

**Suppliers:** Integrate sustainability requirements, submit data and participate in improvement programs.

## 12. Policy Review & Amendment

This Policy will be reviewed biennially or upon significant regulatory or business changes to ensure ongoing relevance and effectiveness.

Amendments require approval from the Board Sustainability Council.

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