

ANDREW YULE & COMPANY LIMITED

(A Government of India Enterprise)

CIN No.: L63090WB1919GOI003229

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RESPONSIBLE ADVOCACY POLICY

Advocacy refers to the activities performed while interfacing with a wide range of stakeholders such as Government agencies, non-governmental organisations, academic and research institutions, associations at a local, national, and international levels, and individuals with the objective of influencing policy, regulations, and other decision-making undertakings.

AYCL believes that it is necessary to represent and engage with authorities on matters concerning the various sectors in which it operates. AYCL's engagement with the relevant authorities is guided by the values of commitment, integrity, transparency, and the need to balance interests of diverse stakeholders.

The Policy on Responsible Advocacy specifies the following critical and necessary guidelines to be followed by all employees and relevant contractors engaged by AYCL in all advocacy activities with internal and external stakeholders.

- Achieve total compliance with all applicable regulations pertaining to advocacy activities with the Government, non-governmental organizations, industry associations, and individuals.
- Focus on transparency, accountability, strong corporate governance standards and ethical guiding principles in all advocacy interactions.
- Strengthen public advocacy principles by seeking alignment with the (evolving) appropriate national and international transparency, accountability, and ethical code of conduct frameworks.
- Ensure adherence to code of conduct (available on AYCL's website) in all stakeholder interactions.
- Implement record management tools to record all advocacy interactions performed on behalf of AYCL by employees and relevant contractors.
- Implement grievance redressal mechanisms to support the investigation of any instance of non-compliance with this policy.
- Undertake appropriate disciplinary action against any proven instance of noncompliance with this policy.

This Policy applies to all employees of AYCL, its contractors, brokers when acting on AYCL's behalf such as agents, public affairs, communications and legal consultants, outsourced personnel, and other third-party representatives.

The policy shall be updated as and when necessary.