

# **The Amber Group**

# **Public Advocacy Policy**

Responsible & Smart Working with Discipline and Integrity embedded with Strong Management Principles

Document Name	Amber Public Advocacy Policy
Preface	Amber is committed to engage in the public policy advocacy process in responsible and ethical way, abiding by the law of the land and serving the best interests of our shareholders, employees, customers, and the communities in which we operate.
Release Date	16 May, 2023
Issued By	Business Responsibility and Sustainability Committee
Approved By	Board of Directors ('BoD')

# 1. **DEFINITIONS**

Term	Definitions		
Amber	Amber Enterprises India Limited		
Associates	It includes directors, KMPs, employees, agents, representatives, vendors,		
	contractors and business partners or any other persons/individuals, who may be		
	acting on behalf of the Company.		
Group	It means all the Subsidiary(ies), Step-down Subsidiary(ies) and Associate(s)		
Companies	companies of Amber.		
Advocacy	Advocacy refers to the activities performed while interfacing with a wide range		
	of stakeholders. It encompasses a wide range of activities that influence decision		
	makers such as Government agencies, non-governmental organisations, academic		
	and research institutions, associations at a local, national, and international levels,		

Amber Enterprises India Limited CIN: L28910PB1990PLC010265

Corporate Office: Universal Trade Tower, 1<sup>st</sup> Floor, Sector -49, Sohna Road, Gurgaon -122 018 Regd. Office: C-1, Phase – II, Focal Point, Rajpura Town – 140 401, Punjab Phone – 0124 3923000 Fax – 0124 -3923016, Website – www.ambergroupindia.com, Email Id–infoamber@ambergroupindia.com



Amber Enterprises India Limited	amber	Policy on Public Advocacy
PAP/2023/06	AMBER GROUP	Date of Issue: 16 May 2023

	and individuals with the objective of influencing policy, regulations, and other decision-making undertakings. Advocacy includes traditional activities such as litigation, lobbying, and public education.
Unethical	Not morally acceptable
Corruption	Corruption is a form of dishonesty or a criminal offense which is undertaken by a person or an organization which is entrusted in a position of authority

### 2. <u>OBJECTIVE</u>

To lay down principles governing the Company and its senior management's conduct while engaging with authorities on various matters as also while taking up various issues at public forums.

## 3. <u>SCOPE</u>

This Policy covers all the associates of the Company including Group Companies or any other persons/individuals, who may be acting on behalf of the Company.

## 4. <u>GUIDING PRINCIPLES</u>

Towards this, we will:

- Achieve total compliance with all applicable regulations pertaining to advocacy activities with the Government, non-governmental organisations, 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 anti-corruption guidelines/policy in all stakeholder interactions;
- Implement record management tools to record all advocacy interactions performed on behalf of Amber and its subsidiaries by employees and relevant contractors;
- Implement grievance redressal mechanisms to support the investigation of any instance of non-compliance with this policy;

Amber Enterprises India Limited CIN : L28910PB1990PLC010265 Corporate Office: Universal Trade Tower, 1<sup>st</sup> Floor, Sector -49, Sohna Road, Gurgaon -122 018 Regd. Office: C-1, Phase – II, Focal Point, Rajpura Town – 140 401, Punjab Phone – 0124 3923000 Fax – 0124 -3923016, Website – www.ambergroupindia.com, Email Id–infoamber@ambergroupindia.com



Undertake appropriate disciplinary action against any proven instance of • noncompliance with this policy.

**K**amber

#### MANAGEMENT ENGAGEMENT IN PUBLIC ADVOCACY 5.

With presence of Amber's CEO Mr. Jasbir Singh, in organizations such as Consumer Electronics and Appliances Manufacturers Association (CEAMA)and Federation of Indian Chambers of Commerce & Industry (FICCI), Amber promotes new ideas and policies and endeavors to find solutions to current industrial problems and to enhance the development of Consumer Electronics & Appliances Industry and its components.

#### 6. **EMPLOYEE ENGAGEMENT IN PUBLIC ADVOCACY**

- Use your own words. Personal letters (not postcards) are most effective. •
- State the topic you are writing about, and your position on it, in the opening sentences.
- Use personal experience or concrete examples from the member's state or district to make your case.
- Refer to bills by name and number.
- Keep it short. Limit the number of topics you address in your letter. You can always write another letter to discuss additional issues.
- Raise questions. A well-formulated question can get a personal response.
- Be polite, positive, and constructive. Don't plead, and never threaten.
- Be timely. Write before decisions are made and action is taken. But don't write too long before – a letter received six months before a vote will probably be forgotten.
- Write to thank your legislators when they take action you agree with. If a staff member is particularly helpful, thank her/him too—or mention your gratitude to your legislator.

#### 7. **CONFIDENTIAL INFORMATION:**

The revelation or use of any confidential product information, data on decisions, plans, or any other information which might be contrary to the interest of the Company without prior authorization, is prohibited. The misuse, unauthorized access to, or mishandling of confidential information, particularly personnel information, is strictly prohibited and will subject an associate to the Discipline Policy up to and including immediate discharge.



### 8. <u>COMPLIANCE</u>

Any violation of this policy will subject the associate to Administrative disciplinary action or immediate discharge. Any Company associate having knowledge of any violation of the policy shall promptly report such violation to the appropriate level of management.

# 9. **<u>POLICY STATEMENT</u>**

- We uphold ethical standards of integrity and probity in matters of public advocacy.
- We undertake policy advocacy through trade and industry chambers and associations, and other similar collective platforms as far as possible.
- We ensure that our advocacy positions are consistent with the principles contained in the NGRBC Guidelines.
- We endeavour to ensure that our policy advocacy positions promote fair competition and respect for human rights.

# 10. POLICY REVIEW AND AMENDMENT

The Business Responsibility and Sustainability Committee shall review and amend the policy from time to time as and when deemed fit and make recommendations on any changes required to the Board for consideration and approval.

We will abide by the principles of the above Policy in letter and in spirit.

