

1 Introduction

Shapoorji Pallonji Real Estate ("Company" or "SPRE") is the real-estate arm of the Shapoorji Pallonji Group, engaged in development of residential, commercial and mixed-use projects. This Human Rights Policy ("Policy") articulates SPRE's commitment to respect, protect, and promote human rights across its operations, projects, and value chain, aligned with internationally recognized standards and applicable national laws.

2 Policy Objectives

The objectives of this Policy are to:

- Inculcate respect for human rights into SPRE's business decisions and operations;
- Ensure fair, safe, and dignified working conditions across project sites and offices;
- Identify, prevent, mitigate, and address adverse human rights impacts arising from SPRE's activities and business relationships; and
- Enable access to effective grievance redressal for affected stakeholders.

3 Reference Frameworks

This Policy is in alignment with the following internationally recognized frameworks and applicable national laws:

- Applicable Indian laws, including labour, employment, occupational health and safety, and social security legislations
- Universal Declaration of Human Rights (UDHR)
- ILO Declaration on Fundamental Principles and Rights at Work;
- ILO Basic Terms and Conditions of Employment
- United Nations Guiding Principles on Business and Human Rights (UNGPs)

4 Scope

This policy applies to all employees, consultants, contractors, volunteers, interns, casual workers, agency workers, and any external partners or vendor including anyone performing work for, or on behalf of SPRE. SPRE expects its business partners to respect human rights standards consistent with this Policy and applicable laws. Where SPRE has influence over upstream and downstream value chain

entities, it will seek to promote adherence to these principles through contractual provisions, engagement, monitoring, and capacity-building.

5 Definitions

Human Rights: The basic rights and freedoms to which all individuals are entitled, regardless of nationality, gender, caste, religion, ethnicity, age, disability, or any other status.

Non-Discrimination: Prohibition of discrimination based on gender, age, caste, religion, disability, sexual orientation, marital status, nationality, or any other legally protected characteristic.

Child Labour: Employment of children below the age of 14 years.

Forced Labour: Any work or service extracted from a person under threat, coercion, or without voluntary consent.

Freedom of Association: The right of workers to form, join, or not join trade unions or workers' associations of their choosing.

Collective Bargaining: The right of workers to negotiate employment terms collectively through representative bodies.

PII: Personal Identifiable Information (PII) refers to any data that can directly or indirectly identify an individual, such as name, contact details, identification numbers, financial information, or any other unique personal attributes.

6 Policy Statement

SPRE is committed to respecting and upholding internationally and nationally recognized human rights across its operations, projects, and value chain. The Company seeks to prevent, mitigate, and address adverse human rights impacts by ensuring fair labour practices, safe and dignified working conditions, and non-discriminatory treatment for all stakeholders. SPRE does not tolerate child labour, forced labour, or modern slavery in any form. Stakeholders vulnerable to human rights risks, including contract workers, migrant labourers, women, persons with disabilities, and local communities affected by project activities will be given focused attention. SPRE strives to identify, prevent, mitigate and address human rights risks arising from its activities and business relationships. The company enables access to effective grievance redressal mechanisms for all affected stakeholders.

6.1 Specific Policy Commitments

6.1.1 Child Labour

SPRE strictly prohibits the use of child labour and ensures that the minimum working age is in accordance with applicable Indian laws and ILO standards. No person below the legally prescribed minimum working age shall be employed at SPRE offices, project sites, or facilities. SPRE ensures age verification check prior to onboarding of its contractors and suppliers and requires them to comply with minimum age requirements and implements age-verification and monitoring mechanisms at project sites to ensure adherence.

6.1.2 Forced Labour and Modern Slavery

SPRE does not promote, support, or tolerate any form of forced labour or modern slavery and is committed to ensuring that all employment is freely chosen. Workers shall be engaged on a voluntary basis and shall be free to leave employment after providing reasonable notice in accordance with company policy and applicable laws. The Company strictly prohibits practices such as retention of identity documents, restriction of movement, debt bondage, coercion, or any other form of involuntary labour. SPRE requires its business partners, including contractors and suppliers, to comply with these principles.

6.1.3 Labour Standards and Working Conditions

SPRE is committed to providing fair, safe, and healthy working conditions across its offices and project sites by ensuring compliance with applicable labour and social security laws. The Company maintains safe and hygienic workplaces, and strictly prohibits any form of harassment, abuse, or inhumane treatment.

6.1.4 Freedom of Association and Collective Bargaining

The right of employees to choose any association is valued by SPRE, and it does not intervene in their decision or will engage in any form of discrimination against them based on their association of choice.

6.1.5 Protection of PII

SPRE is committed to safeguarding all Personal Identifiable Information (PII) by implementing secure data-handling practices and ensuring confidentiality, integrity, and responsible use of employee and stakeholder data.

6.1.6 Career Growth and Mental Health

SPRE supports continuous employee development through learning opportunities while fostering a work environment that promotes well-being and mental health awareness.

6.1.7 Community Health and Safety

SPRE safeguards the health, safety, and well-being of local communities by minimizing project-related risks, adhering to safety standards, and takes proactive measures to prevent adverse impacts.

6.2 Violation

All employees, contractors, and business partners are expected to comply with this Policy. Non-compliance may result in disciplinary action, contractual remedies, or other appropriate measures.

7 Policy implementation mechanism

7.1 Policy Monitoring

SPRE regularly monitors the implementation of this Human Rights Policy through a structured Human Rights Due Diligence (HRDD) process that includes periodic risk assessments, stakeholder consultations, review of labour and site practices, and the tracking of mitigation actions. Assessment findings are reviewed by Human Resources Department to ensure continuous improvement, accountability, and timely corrective action where required.

7.2 Awareness and Communication of the Policy

This Policy is communicated to employees through inductions and trainings and is accessible through ESS portal. SPRE will inform contractors and subcontractors, suppliers and service providers, as required on human rights.

7.3 Grievance Redressal Mechanism

SPRE provides accessible and confidential mechanisms for employees, workers, and other stakeholders to raise concerns or file grievances related to human rights, labour practices, or working conditions. Grievances may be reported as per procedures specified in the Internal Grievance mechanism for employees and External Grievance mechanism for all other stakeholders. All complaints shall be addressed in a timely, fair, and non-retaliatory manner.

8 Review, Update, and Governance

The effectiveness of this policy shall be monitored periodically. SPRE reserves the right to update or amend this Policy to reflect changes in laws, regulations, business operations, or best practices. A formal review will be conducted once in 3 years to update practices, address gaps, and ensure continuous improvement.