

# Supplier Code of Conduct

## Purpose:

Supplier Code of Conduct is to outline the expectations and requirements for suppliers who conduct business with our organization. Our company is committed to operating in a socially responsible and ethical manner, and we expect our suppliers to share this commitment. This code of conduct sets out the minimum standards that our suppliers must adhere to in order to conduct business with us.

## Scope:

The Supplier Code of Conduct is applicable to all suppliers, manufacturers, contractors and suppliers etc engaged by Shapoorji Pallonji Real Estate (SPRE) and extends to all operations that involve procurement. SPRE shall also urge its suppliers to encourage tier-2 suppliers to practice the suggested requirements of this code of conduct.

## Requirements of the Code of Conduct:

### 1. Legal Compliance

Suppliers must comply with all applicable laws, regulations, and standards that apply to their business operations, including but not limited to labour, health and safety, environmental, and anti-corruption laws. Suppliers shall encourage that their subcontractors and suppliers adhere to these laws as well.

### 2. Business Ethics

Suppliers must maintain the highest standards of business ethics and conduct business in a transparent, honest, and fair manner. Suppliers must not engage in any corrupt, unethical, or illegal practices, including but not limited to bribery, fraud, extortion, money laundering, kickbacks and insider trading.

- Suppliers will not offer or accept bribes or other illegal incentives through their employees or representatives.
- Suppliers are required to abide by the tax rules and regulations of the nation in which they conduct business. Prudence and honesty must be the governing principles when tax regulations are unclear.
- Suppliers must compete honestly and morally. They must not discuss sensitive information about SPRE with peers, customers, or competitors in a way that could improperly affect the market or the result of a negotiation or bidding process.
- Supplier shall voluntarily report any violation of this supplier code of conduct to our organization.

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### 3. Labour Standards

Suppliers must respect the human rights of their employees and ensure that they are treated fairly and with dignity. Suppliers should comply with all labour laws and regulations. Suppliers must also provide a safe and healthy work environment for their employees.

- Forced Labour: All labour engaged through suppliers shall be working voluntarily. All forms of forced labour such as bonded labour, debt bondage and labour involvement due to physical threat shall be prohibited.
- Child Labour: Supplier shall not involve any person less than 18 years of age. Suppliers shall ensure they maintain and verify all workers details like date of birth and training history.

### 4. Occupational Health and Safety

Suppliers shall ascertain that a safe and healthy working environment is provided to all employees. Supplier shall provide:

- Accesses to sanitation facility and potable drinking water for all employees.
- Provide with firefighting equipment's on site and other resources to respond to operational emergencies, medical emergencies or natural disasters.
- Provide with all relevant personal protective equipment to all workers on site.
- Work on improve OHS performance.

### 5. Environmental Standards

Suppliers shall minimize the environmental impact of their operations and products. Suppliers must comply with all environmental laws and regulations and strive to reduce waste, pollution, and greenhouse gas emissions. Suppliers shall promote sustainable practices, including recycling and energy efficiency. Ensure that suppliers also strive to achieve continuous improvement in environmental performance and mitigate any impacts.

### 6. Product Safety and Quality

Suppliers shall provide products and services that are safe, reliable, and of high quality. Suppliers shall comply with all relevant safety and quality standards and regulations, and implement effective quality control systems to ensure that their products and services meet these standards.

### 7. Data Protection and Privacy

Suppliers must protect the privacy and confidentiality of our company's data and information and implement appropriate measures to prevent unauthorized access or disclosure of our company's information.

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**8. Conflict of Interest**

Suppliers must avoid any actual or potential conflicts of interest that could compromise their ability to provide products or services to our company objectively and impartially. Suppliers must disclose any conflicts of interest and take appropriate measures to manage or eliminate them.

**Conclusion**

Our company is committed to conducting business in a socially responsible and ethical manner. We expect our suppliers to share this commitment and adhere to the standards set out in this code of conduct. Our company reserves the right to terminate or suspend our relationship with any supplier who violates this code of conduct.

**Venkatesh Gopalkrishnan**

**Date: 15/03/2023**

**Chief Executive Officer**