

Supplier/Contractor Code of Conduct

Mahindra Lifespace Developer Limited (MLDL)

Background: MLDL believes that it is in the mutual interest of both MLDL and its suppliers/contractors to meet the present and future requirements of business and the society. This includes demonstrating responsibility towards the environment and people involved in the manufacture and delivery of products and services. In order to make it's position clear and provide a guidance, MLDL has established the supplier code of conduct. The code describes the environmental and social responsibility requirements for Suppliers/Contractors. As a condition for doing business with MLDL we expect compliance with these requirements. It is our intention to maintain this code in spirit of maintaining a constructive dialogue and collaborative partnership approach for benefit for both parties. The code of conduct is dynamic and evolving and in meant to encourage suppliers/contractors to continually improve their metrics. Code of conduct has to be used in conjunction with the MOU that is signed for each deal.

Scope: Mahindra Lifespaces Supplier/Contractor code of conduct is applicable to contractors and Supplier construction materials. Suppliers/contractors to ensure that all the sub-suppliers/sub-contractors must meet the principles in the Code of conduct.

Levels and grouping

As per this code of conduct there is a provision of :Level 1 – Minimum Standards, Level 2 - Qualifying standard and Level 3 - Leadership standard.

The standards are grouped into three sections

- A. Environment – MLDL expects its suppliers to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies thereby implementing sound life cycles practices. Suppliers should strive to implement recognized management systems and guidelines such as ISO 14001.
- B. Labour – MLDL expects its suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.
- C. Business Ethics – MLDL expects all suppliers to adhere to the highest standard of ethical conduct.

Level 1 – Minimum Standards

All MLDL suppliers are obliged to fulfill the level 1 as described below. It is expected that all suppliers/contractors comply all statutory ESG compliances.

A. Environment

MLDL requires its suppliers to have an environmental policy statement.

Supplier/Contractors shall comply with all the applicable local/regional and national environmental regulatory requirements for the region they operate. Environmental permits/licenses (e.g. discharge monitoring), endorsements and registrations shall be maintained and updated for all the operational and reporting requirements.

B. Labour

i) Child Labour

MLDL respects the children's right to development and education. Therefore, MLDL does not accept the use of child labor as a part of work force at the Supplier. This means not to employ Children under the age of 18, children younger than the legal minimum age.

ii) Discrimination

MLDL respects cultural differences and does not do business with a Supplier if the Supplier practices discrimination at work based on race, religion, gender, age, nationality or sexual orientation, expression or marital status.

iii) Forced Labour

The Code does not permit forced or involuntary labour at the Supplier. This includes forced prison work; work on a forced contract, slavery and other forms of work, which are done against one's will or choice. MLDL does not tolerate employment which confines the employee in unreasonable debt bondage etc.

iv) Harassment, Harsh or Inhumane Treatment:

MLDL requires its suppliers to create and maintain an environment that treats all employees with dignity and respect and will not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. No harsh or inhumane treatment or coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

v) Health and Safety

MLDL supports the fundamental human right to have safe working conditions. Supplier must ensure a good and safe working environment which complies to all applicable rules and laws. As a minimum:

- i) Workers must not be exposed to dangerous work without being properly protected.
- ii) Workers must be provided personal protection equipment and be trained & instructed in its proper use.
- iii) Facilities must comply with applicable laws and rules about construction safety as well as fire protection and fire alarms.
- iv) Facilities must provide appropriate illumination, ventilation and noise protection.
- v) All dangerous materials must be stored in safe places and used in safe and controlled ways.
- vi) All machinery must be properly maintained and shielded.

vii) Facilities for meals and resting must, if provided, be kept clean and safe.

Suppliers/Contractor should strive to implement recognized management systems and guidelines such as OHSAS 18001.

C. Business Ethics

i) Anti bribery

The Company has a zero-tolerance approach to acts of bribery and corruption, by employees or anyone acting on behalf of the Company. Bribery and corruption are recognized as barriers to sustainable development and free trade. MLDL does not accept these practices and therefore does not offer or accept any kind of undue payment in any of our business transactions. Supplier shall act accordingly.

ii) Conflict of Interest

Suppliers must ensure that if the Supplier's employee or his or her family member has a relationship with MLDL employee who can make decisions that will affect the supplier's business, then the supplier must disclose these types of relationships to the Head of Purchase of the concerned MLDL before entering negotiations.

iii) Gifts and Hospitality:

MLDL accept gifts or entertainments if they are consistent with common business practices (Mahindra Code of Conduct), are not excessive in value and cannot reasonably be construed as a bribe or payoff and if they do not violate applicable law. MLDL will, however, not accept any benefit to a MLDL employee in order to facilitate the supplier's business with MLDL.

Level 2 standards – Qualifying standards: All MLDL suppliers/contractors are expected, in case of noncompliance with the qualifying standards in the time of signing a contract with MLDL, to have targets and action plans for reaching the qualifying standards, as they are described below.

A. Environment

Supplier/Contractors should recognize environmental responsibility by managing, measuring and minimizing the environmental impact of their facilities. In all the business operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Specific focus areas include statutory requirements, waste reduction, water re-use disposal, recovery & management, and greenhouse gas emissions. Recognized management systems such as ISO 14001:2015, the Eco Management and Audit System (EMAS) are used as references in preparing the Code and may be a useful source of additional information. The environmental standards are:

i.) Compliance with Statutory Regulations

Same as in Level 1

ii.) Waste reduction and recycling

Supplier/Contractor shall ensure that wastewater and solid waste generated from operations, processes and sanitation facilities are to be monitored, controlled and treated as required by law prior to discharge or disposal.

Other type of waste is to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and reusing materials.

Contractors shall focus on C&D waste management and reduction

iii) Air emissions

Air emissions of dust, volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products due to contractual work/ supplier operations are to be characterized, monitored, controlled and treated as required prior to discharge.

iv) Hazardous Substances

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and legitimate disposal.

v) Restriction of specific substances

Supplier/Contractors shall comply adhere to all applicable laws, regulations and customer requirements regarding prohibition of restricted substances (substances covered under RoHS & REACH)* in their product and process.

These regulations include, but are not limited to:

- Waste Electrical and Electronic Equipment (WEEE)
- REACH = Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals

vi) Greenhouse Gas Emissions

The supplier/contractor shall strive for continuously decreasing greenhouse gas emissions caused by its business operations, primarily carbon dioxide (CO₂) emissions. The monitoring and documentation of CO₂ emissions connected to MLDL part of use will be encouraged. Information about the CO₂ management shall be provided to MLDL on request – already part of contractor data requirements.

vii) Energy management

Energy management with focus on minimizing the waste of energy shall be applied in all business operations. Suppliers should strive to implement recognized management system & guidelines such as

ISO 50001. Suppliers/contractors are encouraged for adoption of renewable energy in their overall mix of energy used.

viii) Reduction in Water consumption

Suppliers shall take all effective measures to reduce their intensity of water consumption from operations & processes.

B. Labour

All applicable clauses in level 1 in child labour, forced labour, inhuman or harsh treatment and discrimination.

a) The Right to Organize and Collective Bargaining

The Supplier must not interfere with the worker's right to form and join unions or to bargain collectively. This means that Supplier must recognize his employees' right to choose whether or not to associate with or establish any organisation including labour organisations. If trade unions are not allowed in the area of operation, or only state authorized organisations are allowed, the Supplier shall facilitate alternative measures to allow employees to access management to discuss work related matters.

b) Working Hours and Salary

MLDL recognizes the need for a sound balance between working time and leisure time for all employees. Unless the law provides otherwise, the maximum working time at the Supplier's sites is 48 hours per week plus maximum 12 hours overtime work. All workers shall be allowed to have at least one day off in a period of seven days unless the national law/rules provides otherwise Salaries for work and overtime shall be in accordance with the applicable national law or applicable national rules. Deductions in salary due to company fines or penalties must never compromise minimum salary/ wages as stipulated by relevant law.

c) **Health & Safety** : Same as in level 1 plus the points below.

Incident Reporting and Tracking

Supplier/Contractors shall define procedures to prevent, manage, track and report occupational injury and illness, including provisions to:

- a) Inspire worker reporting;
- b) Categorize and record injury/illness cases;
- c) Deliver essential medical treatment;
- d) Incident analysis and implement corrective actions to eliminate their root causes;
- e) Facilitate return of workers to work, debriefing and post-traumatic stress procedure. Follow MLDL incident reporting processes.

Sanitation, Food & Housing

Supplier/Contractors shall provide ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier/Contractor or a labor agent are to be maintained clean and safe, and provided with appropriate emergency egress and adequate heat and ventilation with appropriate entry and exit privileges. Contractors to follow MLDL guidelines for labor camps.

d) Right to privacy

Supplier/contractor shall respect his/her employees' right to privacy when it gathers or keeps personal information or implements employee-monitoring practices.

C. Business ethics

a) Anti bribery, Conflict of Interest and Gifts & Hospitality criteria as mentioned before.

b) Information Security

Suppliers/contractors must ensure secure use and distribution of information and data in their workplace. Suppliers/contractors must maintain physical and electronic security for all confidential information received from MLDL for fulfilling their commitment. Suppliers' employees must use extreme care in protecting confidential and proprietary information of any kind from MLDL.

c) Governance

Suppliers must follow highest standards of ethical behavior in all the processes of operation of business and ensure

- a. Sustainable Development as an integral part of their business.
- b. Internal Auditing Process and actions on the audit findings.
- c. Compliance to the Quality Management System.
- d. Correct Financial Reporting.

d) Political Activity

Suppliers should desist making use of MLDL's association with them for getting any political gain or use the name of MLDL to participate in political campaigns.

e) Emergency Preparedness Planning

The supplier shall be prepared for any disruptions (e.g., extreme weather events, natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases) affecting its business and supplies to MLDL companies. This preparedness especially includes disaster management plans to protect both

employees as well as the material and facilities as far as possible from the effects of possible disasters that arise within the domain of operations.

Level 3: Leadership standard

All suppliers/contractors must strive to move to leadership standards

A. Labour

All points as per qualifying standards, plus best in class labour welfare and engagement programs which have won external recognition.

B. Environment

All points as per qualifying standards, plus best in class EHS program which have won external recognition.

Suppliers – materials are green rated, green initiatives on energy, waste, water reduction and circular economy (take back, packaging waste reduction)

Contractors – services demonstrate initiatives on energy, water, waste and circulate economy beyond management systems and compliances

C. Business Ethics and Governance

All points in qualifying standards, plus board leadership in climate action with ESG integrated into strategy. ESG review by board. Reporting as NVG BRR, or per GRI framework.

Compliance to Supplier Code of Conduct –

By signing this Code of Conduct, Suppliers agree to comply with the requirements stated in this Code of Conduct. MLDL reserves the right, upon reasonable notice, to check the compliance.

Signature

I acknowledge that I have read and understand the MLDL Code of Conduct for Suppliers and agree to comply with the requirements of the Code (fill in using block letters or company stamp):

Contractor/Supplier's name: _____

Address: _____

Company/Factory name: _____

MLDL Project name:

Supplier Signature:

Name:

Date