

<b>Document Name</b>	Supplier/Contractor Code of Conduct
<b>Version</b>	2.0
<b>Policy/Code/Manual/Guideline</b>	Code
<b>Sector Level</b>	Mahindra Lifespace Developers Limited
<b>Issuing Authority</b>	<b>Dr. Sunita Purushottam</b> Head of Sustainability <b>Mr. Sushil Dhayal</b> General Manager, Strategic Sourcing <b>Mr. Anitkumar Talim</b> Senior General Manager, Strategic Contract
<b>Document Owner</b>	<b>Dr. Sunita Purushottam</b> Head of Sustainability <b>Mr. Sushil Dhayal</b> General Manager, Strategic Sourcing <b>Mr. Anitkumar Talim</b> Senior General Manager, Strategic Contract
<b>Last Review Date</b>	February 2022
<b>Next Review Date</b>	February 2023

CONFIDENTIAL

# SUPPLIER/CONTRACTOR CODE OF CONDUCT

## Background

**Mahindra Lifespace Developers Limited** believes that it is in the mutual interest of both Mahindra Lifespace Developers Limited 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. To make its position clear and provide a guidance, Mahindra Lifespace Developers Limited has established the supplier/contractor code of conduct. The code describes the environmental and social responsibility requirements for Suppliers/Contractors. As a condition for doing business with Mahindra Lifespace Developers Limited, 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 meant to encourage suppliers/contractors to continually improve their metrics. Code of conduct must be used in conjunction with the MOU that is signed for each deal.

## Scope

Mahindra Lifespace Developers Limited '**Supplier/Contractor Code of Conduct**' is applicable to all contractors and suppliers of construction materials. Suppliers/Contractors need to ensure that all the sub-suppliers/sub-contractors must meet the principles of the Code of conduct.

## Levels and Grouping

As per this code of conduct there is a provision of 3 levels of compliance for suppliers/contractors.

- Level 1 - Minimum** standard,
- Level 2 - Qualifying** standard, and
- Level 3 - Leadership** standard

These standards are grouped into three sections,

### A. Environment

Mahindra Lifespace Developers Limited expects its suppliers/contractors to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers/Contractors 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 lifecycle practices. Suppliers/Contractors should strive to implement recognized management systems and guidelines such as ISO 14001.

### B. Labour

Mahindra Lifespace Developers Limited expects its suppliers/contractors 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

Mahindra Lifespace Developers Limited expects all suppliers/contractors to adhere to the highest standard of ethical conduct.

## Level 1 | Minimum Standards

All Mahindra Lifespace Developers Limited suppliers/contractors are **obliged to fulfill Level 1** as described below. It is expected that all suppliers/contractors comply to all statutory ESG compliances.

### A. Environment

Mahindra Lifespace Developers Limited requires its suppliers/contractors to have an environmental policy statement. Suppliers/Contractors shall comply with all the applicable local/regional and national environmental regulatory requirements for the region they operate in. Environmental permits/licenses (e.g., discharge monitoring), endorsements and registrations shall be maintained and updated for all the operational and reporting requirements.

### B. Labour

#### 1. Child Labour

Mahindra Lifespace Developers Limited respects the children's right to development and education. Therefore, Mahindra Lifespace Developers Limited does not accept the use of child labour as part of workforce at/by the Supplier/Contractor. This means not to employ Children under the age of 18/ children younger than the legal minimum age.

#### 2. Discrimination

Mahindra Lifespace Developers Limited respects cultural differences and does not do business with Suppliers/Contractors if the Suppliers/Contractors practice discrimination at work based on race, religion, gender, age, nationality or sexual orientation, expression, or marital status.

#### 3. Forced Labour

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

#### 4. Harassment, Harsh or Inhumane Treatment

Mahindra Lifespace Developers Limited requires its suppliers/contractors 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, not should there to be the threat of any such treatment.

#### 5. Health and Safety

Mahindra Lifespace Developers Limited supports the fundamental human right to have safe working conditions. Suppliers/Contractors must ensure a good and safe working environment which complies to all applicable rules and laws. As a minimum,

- Workers must not be exposed to dangerous work without being properly protected
- Workers must be provided Personal Protection Equipment (PPE) & be trained & instructed in its proper use
- Facilities must comply with applicable laws and rules about construction safety as well as fire protection and fire alarms
- Facilities must provide appropriate illumination, ventilation, and noise protection
- All dangerous materials must be stored in safe places and used in safe and controlled ways
- All machinery must be properly maintained and shielded
- Facilities for meals and resting, if provided, must be kept clean and safe

Suppliers/Contractor should strive to implement recognized management systems and guidelines such as **ISO 45001**.

## C. Business Ethics

### 1. Anti-bribery and Anti-Corruption (ABAC)

Mahindra Lifespace Developers Limited has a zero-tolerance approach to acts of bribery and corruption by employees or anyone acting on behalf of the Company, and facilitation payments to any **Person** (defined below), including in relation to the obligations under this agreement. The Supplier/Contractor shall comply with all anti-bribery and corruption and anti-money laundering laws and regulations and policies, and, in any event, shall ensure that their employees and service providers (including their personnel) shall not promise, offer, give or agree to give any person whatsoever (including but not limited to private individuals and Public Officials) ("**Person**"), or solicit, accept or agree to accept from any Person, anything of value, either directly or indirectly, in connection with the Supplier's/Contractor's obligations under this agreement in order to obtain, influence, induce or reward any improper or illegal advantage (the "**Anti-Corruption Obligation**"). Bribery and Corruption are recognized as barriers to sustainable development and free trade. Mahindra Lifespace Developers Limited does not accept these practices and therefore does not offer or accept any kind of undue payment in any of our business transactions. Suppliers/Contractors shall act accordingly.

The Supplier/Contractor shall until the expiry or termination of the agreement with Mahindra Lifespace Developers Limited, whichever is earlier:

- a. Immediately disclose in writing to Mahindra Lifespace Developers Limited, details of any breach of the ABAC Obligation
- b. On request by Mahindra Lifespace Developers Limited, cooperate with Mahindra Lifespace Developers Limited to ensure and monitor compliance with the ABAC Obligation; and
- c. Inform its personnel that they are required to act in accordance with the ABAC Obligation.

Mahindra Lifespace Developers Limited shall have the right to terminate the agreement with immediate effect if Mahindra Lifespace Developers Limited believes that the ABAC Obligation has been breached.

### 2. Conflict of Interest

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

### 3. Gifts and Hospitality

Mahindra Lifespace Developers Limited accepts 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. Mahindra Lifespace Developers Limited will, however, not accept any benefit to a Mahindra Lifespace Developers Limited employee to facilitate the supplier's/contractor's business with Mahindra Lifespace Developers Limited.

## Level 2 | Qualifying standards

All Mahindra Lifespace Developers Limited suppliers/contractors are expected, in case of non-compliance to **qualifying standards** at the time of signing a contract with Mahindra Lifespace Developers Limited, to have targets and action plan for reaching the qualifying standards, as they are described below.

### A. Environment

Suppliers/Contractors should recognize environmental responsibility by managing, measuring, and minimizing the environmental impact of their facilities/activities. 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 Scheme (EMAS) are used as references in preparing the Code and may be a useful source of additional information. The environmental standards are,

#### 1. Compliance with Statutory Regulations

Same as in Level 1

#### 2. 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, material substitution, conservation, recycling and reusing materials. Contractors shall focus on Construction & Demolition (C&D) waste management and reduction.

#### 3. Air emissions

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

#### 4. 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.

#### 5. Restriction of specific substances

Suppliers/Contractors shall adhere to all applicable laws, regulations and customer requirements regarding use of prohibited/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**)
- Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals (**REACH**)

#### 6. Greenhouse Gas Emissions

The supplier/contractor shall strive for continuously decreasing greenhouse gas emissions caused by its business operations, primarily carbon dioxide (CO<sub>2</sub>) emissions. The monitoring and documentation of CO<sub>2</sub> emissions connected to Mahindra Lifespace Developers Limited part of use will be encouraged.

Information about the CO<sub>2</sub> management shall be provided to Mahindra Lifespace Developers Limited on request – already part of contractor data requirements.

## 7. Energy management

Energy management with focus on minimizing the wastage of energy shall be applied in all business operations. Suppliers/Contractors 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 use.

## 8. Reduction in Water consumption

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

## B. Labour

Covers all applicable clauses in **level 1** on child labour, forced labour, inhuman or harsh treatment and discrimination in addition to the below mentioned points.

### 1. The Right to Organize and Collective Bargaining

The Supplier/Contractor must not interfere with the worker's right to form and join unions or to bargain collectively. This means that Supplier/Contractor must recognize his employees' right to choose whether 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/Contractor shall facilitate alternative measures to allow employees to access management to discuss work related matters.

### 2. Working Hours and Salary

Mahindra Lifespace Developers Limited recognizes the need for a sound balance between work and leisure for all employees. Unless the law provides otherwise, the maximum working time at the Supplier/Contractor sites is 48 hours per week plus maximum 12 hours of 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 provide 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.

### 3. Health & Safety

Same as in level 1 plus the below mentioned points.

#### i. Incident Reporting and Tracking

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

##### I. Inspire worker reporting

Categorize and record injury/illness cases

##### II. Deliver essential medical treatment

Incident analysis and implement corrective actions to eliminate their root cause.  
Facilitate return of workers to work, debriefing and post-traumatic stress procedure. Follow Mahindra Lifespace Developers Limited incident reporting processes.

#### 4. Sanitation, Food & Housing

Suppliers/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 labour 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 Mahindra Lifespace Developers Limited guidelines for labour camps.

#### 5. 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

#### 1. Anti-bribery and Anti-Corruption, Conflict of Interest and Gifts & Hospitality

Criteria as mentioned under minimum standards.

#### 2. 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 Mahindra Lifespace Developers Limited for fulfilling their commitment. Suppliers'/Contractors' employees must use extreme care in protecting confidential and proprietary information of any kind from Mahindra Lifespace Developers Limited.

#### 3. Governance

Suppliers/Contractors must follow highest standards of ethical behaviour in all the processes of operation of business and ensure,

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

#### 4. Political Activity

Suppliers/Contractors should desist making use of Mahindra Lifespace Developers Limited's association with them for getting any political gain or use the name of Mahindra Lifespace Developers Limited to participate in political campaigns.

#### 5. Emergency Preparedness Planning

Suppliers/Contractors shall be prepared for any disruptions (e.g., extreme weather events, natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases, & the likes) affecting its business and supplies to Mahindra Lifespace Developers Limited. This preparedness especially includes disaster management plan 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 conservation of energy, water, & reduction of 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 as per GRI framework.



## Declaration

### Compliance to Supplier/Contractor Code of Conduct

By signing this Code of Conduct, I agree to comply with the requirements stated in this Code of Conduct. Mahindra Lifespace Developers Limited reserves the right, upon reasonable notice, to check the compliance.

I acknowledge that I have read and understand the Mahindra Lifespace Developers Limited **Code of Conduct** for Suppliers/Contractors and agree to comply with the requirements of the Code.

### FILL IN USING BLOCK LETTERS OR COMPANY STAMP

**Supplier/Contractor Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**Factory/Company Name:** \_\_\_\_\_

**Mahindra Lifespace Developers Limited Project Name:** \_\_\_\_\_

**Supplier/Contractor Signature:** \_\_\_\_\_

**Name:** \_\_\_\_\_

**Date:** \_\_\_\_\_

CONFIDENTIAL