



Reference	EOP/ESG/SCoC/01	Version: June 2, 2021
Policy Supplement Title	Supplier Code of Conduct	
Entity	Embassy Office Parks Management Services Private Limited (“ Manager ”) in its capacity as manager of Embassy Office Parks REIT (“ Embassy REIT ”)	
Responsibility	Head – Operations (India)	

Version #	Version Date	Change Type
V1	June 2, 2021	Created

Document Review Cycle			
#	Effective Date	Next review date	Policy Owner
1	June 2, 2021	Q4 Board Meeting date of the Manager of every Financial Year	Head – Operations (India)

Introduction	EMBASSY REIT endeavours to conduct business in a sustainable manner, by incorporating ESG aspects across the value chain. We expect that our suppliers exercise good judgement, care and consideration by aligning to both the requirements and intentions of this SCoC and shall monitor, disclose and demonstrate their continual improvement in sustainability/ESG performance to Embassy REIT.
Scope of Standards	<p>This policy is applicable to Manager, Embassy REIT, its Special Purpose Vehicles (“SPVs”) and its Holding Company(ies) (“Holdco”).</p> <p>This Code defines the basic requirements for all existing and new Suppliers¹ to adhere to when conducting business with EMBASSY REIT. This document is applicable for all Tier I suppliers and we encourage them to promote these guidelines among their sub tier suppliers (supplier’s sub-contractors or sub-suppliers) to exercise due diligence in implementing requirements equivalent or similar to this SCoC.</p>

¹ All categories of suppliers including services providers, transport/ logistic providers etc



Requirements

All existing and new suppliers engaging with Embassy REIT must review our code of conduct and anti-money laundering policy and anti-corruption compliance policy statements. Copies of our code of conduct and anti-money laundering policy are available on our website at <https://www.embassyofficeparks.com/esg/governance-documents/>

EMBASSY REIT has developed these Supplier Standards to establish organization's expectations with regard to Suppliers' business practices and these are enlisted below:

1. Prohibition of child and forced labour: Use of forced, bonded, or involuntary labour shall be prohibited. Use of child labour shall be prohibited, and suppliers shall take the appropriate measures to ensure that no child labour occurs at their own workplace or that of their sub-contractors.

2. Human Rights: Wages and social benefits (including sick leave, annual leave, breaks and working hours) shall be in line with the national legal compliance/labour laws. In addition, an independent grievance system accessible to the workforce needs to be maintained. Any form of physical or mental abuse, sexual or other harassment shall be prohibited.

3. Working conditions: The working environment shall be safe and hygienic, adequate measures shall be taken to prevent accidents, fires, property damages, environmental incidents and injuries. Ensure robust emergency preparedness and response mechanisms are implemented and maintained, including training of the workforce on the same. The supplier shall comply with all applicable occupational health and safety related laws and regulations.

4. Freedom of association and collective bargaining: Suppliers must respect the rights of their employees to organize/join labour unions and bargain collectively without fear of punishment, intimidation or harassment.

5. Environment protection- Adequate measures shall be implemented to protect the environment and to manage natural resources (water, energy, materials) in a responsible manner for services/material being supplied. The supplier shall comply with all applicable environmental laws and regulations.

6. Ethics & Governance- The supplier shall comply with all applicable laws concerning bribery, corruption, fraud, and any other prohibited business practices. The supplier shall not offer or give any inappropriate/improper benefit or favour or incentive to any regulatory bodies, government official, third party or engage with parties that may have conflict of interest.

7. Safety: Suppliers/vendors are expected to align with our safety practices and management systems for effective and collective governance and action on safety.



<i>Reporting to Embassy REIT</i>	All suppliers are required to track, record and maintain details on aspects outlined in this Code of Conduct. Any major changes in operations that may impact the ESG performance should be proactively communicated. Any violations/incidents/accidents should be communicated to Embassy REIT.
<i>SCoC Implementation and violation of SCoC</i>	As part of this SCoC implementation process, suppliers should enable access to Embassy REIT/ any independent party conducting audit on behalf of Embassy REIT to visit/audit (announced/unannounced) the supplier premises/operations. Based on the observations/findings raised during such audits, suppliers are required to provide corrective and preventive action plans within agreed timelines Suppliers are expected to carry out self-assessment for their compliance with this SCoC. Failure to comply with the Supplier Code of Conduct may result in termination of services as EMBASSY REIT's supplier.
<i>Amendment</i>	This policy will stand automatically amended to the extent of any relevant change(s) in the applicable law and or for any change(s) in fact.