SUPPLIERS CODE OF CONDUCT

For Mindspace Business Parks REIT

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I. PURPOSE

The Code sets the framework for Mindspace REIT and its Asset SPVs (together referred to as the **"Mindspace REIT Group or Group**") suppliers to conduct business in a compliant manner and promote sound practices for environmental, social, health and safety management.

II. APPLICABILITY

This Code is approved and applicable to the Mindspace REIT Group. Suppliers of Mindspace REIT Group shall comply with the Code.

III. DEFINITIONS

"Applicable Law" means any statute, law, regulation, ordinance, rule, judgement, order, decree, bye-law, approval of any Governmental Agency, directive, guideline, policy, requirement or other government restriction or any similar form of decision of or determination by, or any interpretation having the force of law of any of the foregoing Governmental Agency having jurisdiction, applicable to any Party, in force from time to time, including but not limited to the Securities and Exchange Board of India (Real Estate Investment Trusts) Regulations 2014 **(" SEBI REIT Regulations")**;

"Mindspace REIT Group / Group" shall include Mindspace REIT and its Asset SPV's**.**

"Asset SPVs" shall mean the asset SPVs of Mindspace REIT as per the definition under the REIT Regulations, as amended from time to time.

"Supplier/s" shall mean suppliers/service providers/ vendors/ traders / agents / contractors engaged for the purpose of development and maintenance of the assets in the portfolio of Mindspace REIT Group.

IV. CODE PRINCIPLES

Legal Compliance

Mindspace REIT Group Suppliers shall comply with applicable laws, codes or regulations of the countries, states, and localities in which they operate. This includes, but is not limited to, laws and regulations relating to environmental, occupational health and safety, and labor practices.

Health and safety

Mindspace REIT Group's Suppliers shall provide their employees with a safe and healthy working environment in order to prevent accidents and injuries arising out of, linked with, or occurring in

the course of work or as a result of the operations of the Suppliers. Suppliers shall, among other things, do the following:

- Provide occupational health and safety training to their employees
- Have a system in place for injury and illness reporting
- Worker exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled
- Make available medical treatment and/or compensation as per applicable laws to injured/ill workers arising as a result of working for the Supplier
- Worker exposure to chemical, biological, and physical agents is to be identified, evaluated and controlled. When hazards cannot be adequately controlled by engineering and administrative means, workers are to be provided with appropriate personal protective equipment.
- Machine safeguarding and other protective measures to prevent injuries/illnesses to workers
- Workers shall be provided clean and safe facilities including clean toilet facilities, access to potable water and sanitary food preparation and storage facilities.
- Worker dormitories provided by the Suppliers shall be clean, safe, and provide emergency egress, adequate heat and ventilation and reasonable personal space.

V. LABOR AND HUMAN RIGHTS

Mindspace REIT Group expects its Suppliers to adopt sound labour practices and treat their workers fairly in accordance with local laws and regulations. In addition, Suppliers must comply with the following standards:

- **Freely Chosen Employment**: Suppliers shall not use any forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.
- **No Child Labor**: Suppliers shall comply with local minimum working age laws and requirements and not employ child labor.
- **Minimum Wages**: Suppliers shall provide wages for regular and overtime work and benefits that at least meet legal requirements.
- **Working Hours**: Suppliers shall not require workers to work more than the maximum hours of daily labor required legally.
- **No Harsh, Inhumane Treatment or Abuse**: Suppliers shall treat each employee with dignity and respect. In no event shall Supplier's workers be subject to threats of violence, physical punishment, confinement, or other form of physical, sexual, psychological, or verbal harassment or abuse.
- **No Discrimination**: Suppliers shall not discriminate in its employment practices based on race, color, religion, sex, age, physical disability, national origin, creed, or any other basis prohibited by law.
- **Freedom of Association:** Suppliers shall recognize and respect the rights of its workers to join or to refrain from joining associations of their own choosing and the right to collective bargaining in accordance with local labor laws and established practices.

VI. ENVIRONMENT

Protecting the environment and contributing to sustainable development is of great importance to Mindspace REIT Group. Suppliers shall actively strive to increase the positive and limit the negative impact of their operations and supply chain on the environment and society. Suppliers shall comply with applicable environmental laws and regulations. Such compliance shall include, among other things, the following:

- Comply all laws pertaining to sustainability, pollution, environment protection etc. as applicable. Also, obtain and maintain environmental permits and timely filing of required reports.
- Proper handling and disposition of hazardous materials
- Monitoring, controlling, and treating discharges generated from operations
- The supplier shall ensure resource efficiency to optimize the process to conserve natural resources and manage greenhouse gas and other air emissions to reduce the release of harmful emissions to the environment.
- Make provisions to undertake initiatives on continuous basis to promote environmental responsibilities and encourage environment friendly and energy efficient process and technologies.
- Ensure prevention of pollution and manage wastes of any form - hazardous, non- hazardous, industrial, solid/ liquid/ gaseous as per the prevailing/ recommended laws.
- Conduct their business activities in an environmentally responsible manner according to the entity's guidelines and in accordance with applicable Environmental Policy
- Protect biodiversity and avoid deforestation during their business activities.

VII. ANTI-CORRUPTION, CONFLICT OF INTEREST AND COMPETITION LAW

Mindspace REIT Group is committed to conducting business with high ethical integrity. Mindspace Group has zero tolerance of corruption, including bribery, unlawful kickbacks, extortion, etc. Suppliers shall ensure conflicts of interest, if any, relevant to their engagement with the Group is disclosed. We also respect competition laws which prohibit abuse of market position. Suppliers shall:

- Comply with applicable anti-corruption laws and shall not engage in any form of corrupt practices.
- Respect and comply with applicable competition laws and regulations, and establish systems to prevent competition law infringements, such as price fixing, market sharing or bid rigging.

VIII. MONITORING AND COMPLIANCE

Suppliers shall conduct periodic audits to ensure compliance with this Code and applicable legal requirements. Mindspace REIT Group or its representatives may engage in monitoring activities to confirm Supplier's compliance to this Code, including on-site inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess supplier's performance. The Group may periodically review relevant purchasing practices to assess their alignment with this Code and to identify and address potential conflicts with the environmental, social, health and safety requirements communicated to Suppliers. Where gaps or non-compliance are identified, the Group may engage with the relevant Supplier on appropriate

corrective or improvement measures and consider material, repeated or unresolved non-compliance in supplier evaluation, contract renewal and future procurement decisions, subject to applicable contractual terms and Applicable Law.

IX. Management and Review

This Code shall be reviewed annually.

X. AMENDMENT

Notwithstanding the above, this Code will stand amended to the extent of any change in Applicable Laws. The Board of Directors of the Manager or any Committee as may be authorised by the Board of Directors, reserves the right to amend or modify this Code in whole or in part.