

Vendor Code of Conduct

Purpose

At Sumadhura Infracon Private Limited, we believe that responsible business conduct across our value chain is fundamental to delivering sustainable and high-quality developments. This Code defines the standards of integrity, environmental responsibility, and social accountability expected from our vendors.

Scope

This Code applies to all vendors, including suppliers, contractors, consultants, and service providers engaged with Sumadhura Infracon.

Vendors are expected to align with the principles set out in this Code within their operations and, wherever feasible, across their supply chains.

Commitment:**1. Environmental Responsibility**

- Vendors shall actively manage environmental impacts arising from their operations, including measuring, monitoring, and reducing greenhouse gas (GHG) emissions, and adopting targets and decarbonization initiatives wherever feasible.
- Vendors shall prioritize energy efficiency across operations by adopting best available technologies, improving process efficiency, minimizing energy intensity, and promoting the adoption of renewable energy and low-carbon technologies to progressively reduce reliance on fossil fuels.
- Vendors shall implement and maintain certified environmental and energy management systems, where applicable, to support systematic management of environmental performance.
- Vendors shall conserve water resources by optimizing consumption, improving water-use efficiency, and implementing water recycling and reuse practices to minimize freshwater usage.
- Vendors shall minimize waste generation and follow principles of circularity by promoting reduction, reuse, and recycling of materials, ensuring responsible disposal and minimal landfill impact.
- Vendors shall take necessary measures to prevent pollution and ensure responsible management of air emissions, wastewater, and solid waste.
- Vendors shall protect biodiversity, avoid deforestation, and prevent activities that may lead to environmental degradation, while promoting responsible land use practices.
- Sustainable sourcing shall be encouraged, including the use of environmentally responsible and certified materials, sustainable packaging wherever feasible.

2. Social Responsibility

- Vendors shall uphold human rights across their operations, including the prohibition of child labour, forced labour, bonded labour, or any form of involuntary employment.
- Vendors shall ensure fair labour practices, including equal pay for equal work, in compliance

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with applicable laws and regulations.

- Vendors shall provide employees with all entitled statutory benefits, including leave, social security, and other welfare provisions as required by applicable laws.
- Vendors shall maintain safe and healthy working conditions and implement appropriate measures to prevent occupational hazards and incidents.
- Vendors shall implement and maintain certified occupational health and safety management systems, where applicable, to ensure systematic management of workplace safety.
- Vendors shall ensure that discrimination, harassment, and unfair treatment in any form are not tolerated, and that all workers are treated with dignity and respect.
- Vendors shall respect applicable labour rights, including freedom of association and lawful representation.

3. Governance and Business Ethics

- Vendors shall conduct business with the highest standards of integrity, transparency, and accountability.
- Vendors are prohibited from giving, offering, making, or receiving any illegal payments or gifts, whether in cash or in kind, to or from Sumadhura Infracon or its employees in exchange for undue benefits or favours in conducting business.
- Vendors shall comply with applicable laws related to anti-bribery, corruption, and fair competition, and shall not engage in unethical or anti-competitive practices.
- Vendors shall establish processes to handle grievances promptly and impartially, in alignment with applicable whistleblower and anti-sexual harassment requirements.
- Vendors shall safeguard confidential information and implement appropriate controls to ensure data privacy and protection.
- Vendors shall disclose any actual or potential conflicts of interest that may influence business decisions.
- Vendors must comply with all applicable laws and regulations and must not engage in any violations.

4. Management Systems

- Vendors shall implement appropriate systems and processes to identify, assess, and manage environmental, social, and governance (ESG) risks associated with their operations.
- Vendors shall provide adequate training and awareness to employees to ensure understanding and effective implementation of this Code.
- Vendors shall maintain relevant documentation and records to demonstrate compliance with the requirements of this Code.
- Vendors shall establish clear roles, responsibilities, and accountability mechanisms to ensure effective implementation and oversight.

5. Policy Compliance and Review

- Compliance with this Code shall be a requirement for all vendor engagements and shall be subject to periodic review by Sumadhura Infracon.

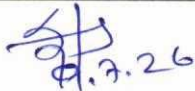
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- Vendors shall cooperate with assessments and implement corrective actions, where required, within agreed time-lines.
- Non-compliance with this Code may result in corrective actions, including suspension or termination of business relationships.
- This Code shall be reviewed periodically to ensure its continued relevance and alignment with regulatory, environmental, and business requirements.

This Policy shall be reviewed annually to ensure its ongoing relevance, effectiveness, and alignment with emerging environmental risks and regulatory requirements.

Any amendments to this Policy shall require approval from the Chairman & Managing Director and Procurement team and shall be overseen by the Board Management Committee.

Prepared and reviewed	Checker	Approval
		

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