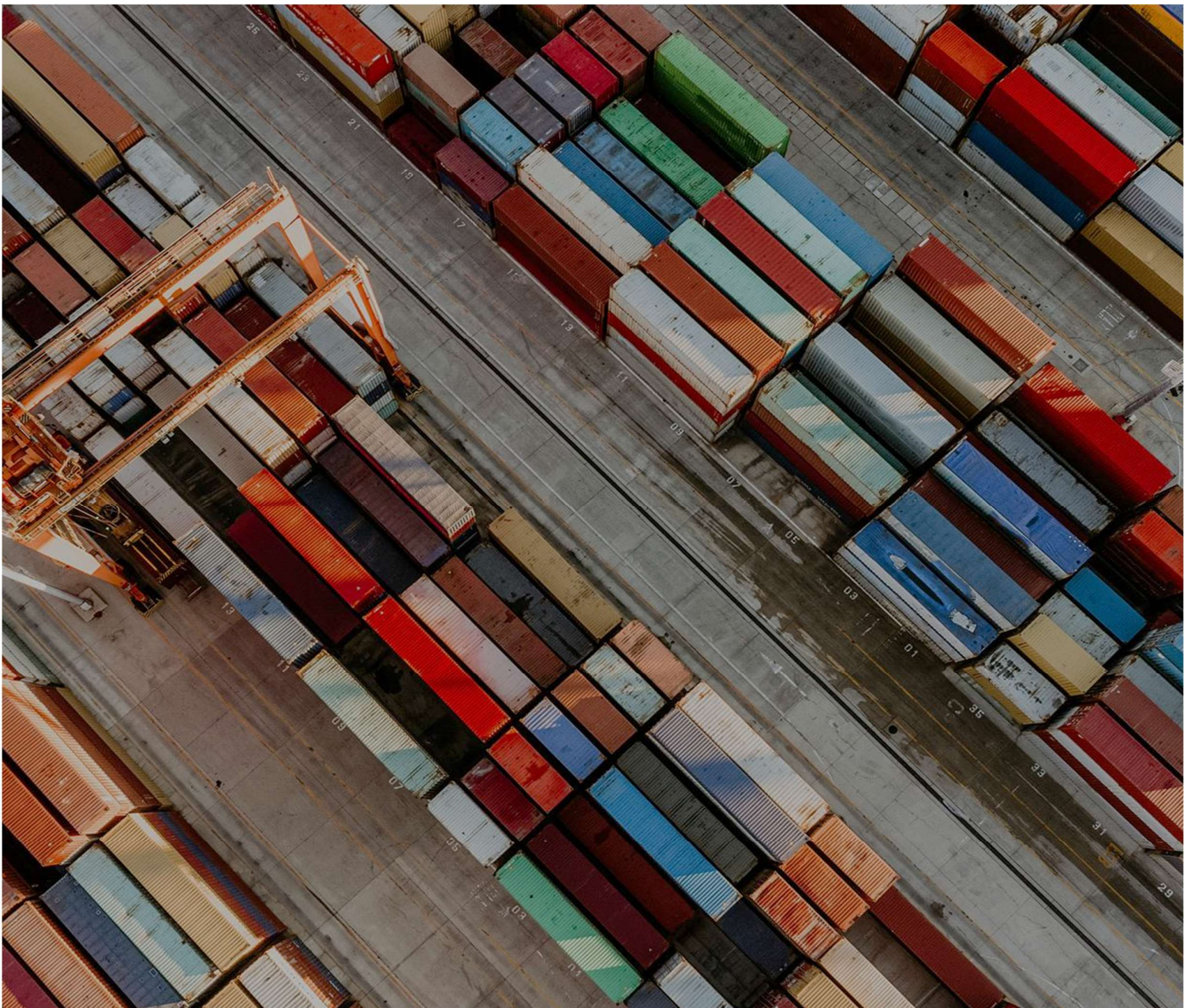




# Supplier Code of Conduct



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### Document Change Log

Version	Revised on	Purpose of change
v1.0	15 <sup>th</sup> January 2025	New Policy release
V1.1	15 <sup>th</sup> December 2025	To align the policy with the current ESG approach of the organisation



## 1. INTRODUCTION

BPTP Limited (“BPTP” or “the Company”) is committed to conducting procurement in line with our environmental, social and governance commitments. Our suppliers and business partners play a crucial role in helping us deliver high-quality real estate solutions in a responsible manner. This Supplier Code of Conduct (“Policy”) sets out the expectations and standards that all suppliers, vendors, service providers, contractors, and business partners (“Suppliers”) shall adhere to when conducting business with or on behalf of BPTP.

BPTP Limited is committed to ensuring all vendors and suppliers adhere to our Supplier Code of Conduct, reflecting the highest standards of compliance, ethics, sustainability, and social responsibility. We expect all partners to uphold principles aligned with responsible development and international frameworks—including the UN Global Compact, OECD Guidelines, and UN Guiding Principles on Business and Human Rights—covering human rights, labor standards, environmental protection, and anti-corruption

## APPLICABILITY OF THIS POLICY

This Policy applies to BPTP Limited (the “Company”, “We” or “Our”) and its subsidiaries. It covers all operational/development projects, employees, workers, contractors, suppliers, facility partners, and local communities engaged in or impacted by our operations. Further:

- All current and potential Suppliers engaged with BPTP Limited, including but not limited to manufacturers, agents, distributors, contractors, consultants, and third-party intermediaries.

## 2. APPROACH

Suppliers are expected to meet the mandatory pre-qualification criteria as defined in BPTP’s Vendor Evaluation and Registration processes. To ensure ongoing compliance and risk management, suppliers are subject to periodic assessments, audits, and inspections as part of BPTP’s Vendor Risk Management and ESG due diligence protocols. Suppliers are expected to proactively disclose any instances of non-compliance and work collaboratively with BPTP to implement corrective actions within agreed timelines. Non-compliance with these requirements may result in sanctions, including probationary status, removal from the approved supplier list, or termination of contractual agreements.

## GOVERNANCE

### 3.1. Compliance with Laws and Regulations

Suppliers must comply with all applicable Indian laws and regulations including, but not limited to:

- The Companies Act, 2013
- Contract Labour (Regulation and Abolition) Act, 1970
- Payment of Wages Act, 1936
- Minimum Wages Act, 1948



- Factories Act, 1948
- Environmental Protection Act, 1986
- Prevention of Corruption Act, 1988
- Child Labour (Prohibition and Regulation) Act, 1986
- Real Estate (Regulation and Development) Act, 2016 (RERA)
- SEBI Regulations (where applicable)

### **3.2. Ethical Business Conduct**

- Suppliers must act with integrity and fairness in all interactions.
- Bribery, corruption, kickbacks, and any form of improper payments or benefits are strictly prohibited.
- Facilitation payments to expedite routine activities are not permitted.
- Conflicts of interest must be disclosed to BPTP, and any actions that might compromise the supplier's objectivity must be disclosed, the final decision shall rest with BPTP in such cases.
- Suppliers must desist from leveraging the Company's association with them to gain political advantage or participate in political campaigns.
- Suppliers shall ensure that any gifts or hospitality received from, or given to, BPTP members or service providers comply with company's ethics & beliefs.

### **3.3. Anti-Bribery and Corruption**

- Bribes in any form, whether direct or indirect, are strictly prohibited.
- Suppliers shall not offer any undue payment or advantage to influence a business decision.
- Any such attempts should be reported to the Ethics Committee immediately.

### **3.4. Confidentiality and Data Protection**

- Suppliers must respect the confidentiality of all information shared by BPTP.
- They must not disclose or misuse any confidential or proprietary information without prior written consent.
- Suppliers must comply with the Information Technology Act, 2000, and applicable data privacy regulations.

### **3.5. Intellectual Property**

- Respect and protect BPTP's and others' intellectual property rights.
- Unauthorized use, disclosure, or reproduction of trademarks, patents, designs, or copyrighted material is prohibited.

### **3.6. Fair Competition and Antitrust**

- Suppliers must engage in fair competition and avoid anti-competitive practices such as collusion, price fixing, or bid rigging.



### **3.7. Prevention of Insider Trading**

- Suppliers who have access to unpublished price-sensitive information (UPSI) must not use such information for trading in securities.
- Suppliers must comply with SEBI (Prohibition of Insider Trading) Regulations, 2015

### **3.8. Shareholder Rights and Corporate Governance**

- Suppliers must respect the principles of good governance and ethical conduct that align with protecting shareholder interests.
- Ensure business practices support transparency, accurate recordkeeping, and timely disclosure.
- Act in ways that do not expose BPTP or its stakeholders to reputational, legal, or financial risk.

### **3.9. Monitoring, Audits, and Corrective Action**

- BPTP reserves the right to audit suppliers and assess compliance with this Code.
- Suppliers are expected to maintain complete and accurate records of business operations.
- Any non-compliance must be rectified promptly through corrective action plans.

### **3.10. Grievance Mechanism and Whistleblower Protection**

- Suppliers must establish an internal grievance redressal system.
- Suppliers and their employees can report unethical practices related to their engagement with BPTP without fear of retaliation.

## **SOCIAL**

### **3.11. Fair Labour and Human Rights**

- Suppliers must uphold internationally recognized human rights principles
- Employment should be voluntary, and suppliers shall not engage in any form of forced, bonded, or child labour.
- Ensure that neither the suppliers nor BPTP confiscate personal documents employees or force them to make any payment to us or to anyone else to secure employment with us, or to work with us.
- Suppliers engaged with the company must not employ any child below the age of 18 years of age or children younger than the legal minimum age.
- Workers shall not be discriminated against based on caste, gender, religion, disability, marital status, sexual orientation, or age.
- Working hours must comply with national laws, and overtime must be compensated fairly.
- Wages must be paid in a timely manner and meet or exceed the minimum legal requirements.
- Freedom of association and the right to collective bargaining must be respected.



- All Suppliers should strive to maintain an environment that treats all employees with dignity and respect. The Company prohibits the use of any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. Furthermore, the Company does not tolerate harsh or inhumane treatment, coercion, or corporal punishment of any kind, nor should there be any threat of such treatment.
- Except where the law dictates otherwise, the maximum duration of work permitted at Supplier sites is 48 hours per week, with an additional allowance of up to 12 hours for overtime work. All employees must be entitled to at least one day off within a seven-day period, unless otherwise specified by national laws or regulations. Compensation for regular work hours and overtime must be in accordance with the prevailing laws/ notifications/policies/ national legislation or regulations.

### **3.12. Health and Safety**

- Suppliers must provide a safe and hygienic working environment.
- All applicable health and safety laws must be adhered to.
- Emergency preparedness plans and appropriate safety training must be in place.
- Protective equipment must be provided and used where necessary.
- All hazardous materials must be stored securely and shall only be used in safe /controlled / prescribed manners, in accordance with applicable laws/ regulations/notifications/policies of the concern authority.
- All machinery must be appropriately maintained and safeguarded.
- Facilities designated for meals and resting, if provided, must be maintained in a clean and safe manner.
- Suppliers should develop capabilities to track, manage, and prevent occupational injuries and/ or illness.
- Suppliers are required to ensure easy access to clean toilet facilities, potable water, and hygienic food preparation, clean lodging facilities, storage, and eating areas for their employees.
- Thoroughly analyse injury incidents and implement corrective actions to effectively address their root causes. Ensure the return of workers to their duties, conduct debriefing sessions, and establish procedures for handling post-traumatic stress.

## **ENVIRONMENT**

### **3.13. Environmental Sustainability**

- Suppliers must comply with environmental laws and regulations and strive to minimize environmental impact.
- Encourage use of renewable energy, water conservation, proper waste disposal, and energy-efficient technologies.

- Environmental permits and reporting requirements must be obtained and maintained.
- All environmental permits/certifications required, as per applicable law, shall be maintained and updated on a periodic basis by the Supplier
- All wastewater and solid waste produced from operations should be monitored and undergo treatment (whenever required) in accordance with applicable laws/regulations/notifications/policies of the competent authority, before being discharged or disposed of.
- Efforts should be made to minimize waste generation and implementing recycling, reuse, and reduce programmes.
- Suppliers are encouraged to implement all necessary measures aimed at reducing the intensity of water consumption for their operations and processes.
- Suppliers are encouraged to adopt recognized management systems and guidelines, such as ISO 140001, ISO 50001, to facilitate environmental and energy management. Additionally, they are urged to incorporate renewable energy sources into their overall energy consumption framework.
- The Supplier is obligated to work towards minimizing harmful air emissions like dust, corrosives, aerosols, and greenhouse gas emissions. All such emissions must be actively tracked and treated before discharge, in accordance with applicable laws/ regulations/notifications/policies of the competent authority.

### **3.14. Responsible Sourcing Practices**

- Maintain traceability of materials, components, and services within the supply chain, especially those that are environmentally or socially sensitive.
- Conduct supplier due diligence assessments to identify and manage ESG risks in the upstream value chain.
- Avoid procurement practices that may contribute to deforestation, land degradation, exploitation of labour, or violation of indigenous rights.
- Support local and/or sustainable procurement where it is feasible to promote regional economies and reduce transportation-related emissions.
- Encourage circularity using recycled content, reuse of materials, and reduction of construction and demolition waste.
- Preference must be given to materials that are locally sourced, reducing transportation emissions and supporting the local economy.
- Suppliers are encouraged to use construction and furnishing materials that have lower greenhouse gas emissions associated with their lifecycle.
- Suppliers must prioritize the use of materials made from renewable sources (e.g., bamboo, cork) and include recycled content where feasible.
- Suppliers must not use materials or chemicals listed on the red list of hazardous substances known for their adverse impact on human health and the environment (e.g., asbestos, formaldehyde, lead-based paints).
- All timber and wood products encouraged to be sourced from sustainably managed forests and certified by credible third-party certification schemes such



as FSC (Forest Stewardship Council) or PEFC (Programme for the Endorsement of Forest Certification).

### **3.15. Material Sourcing Expectations**

- Source materials in compliance with all applicable environmental, labour, and human rights laws.
- Give preference to certified, sustainable, and ethically sourced materials with facilitates our ambitions towards responsible sourcing (e.g., FSC-certified wood, recycled aggregates, low-VOC products).
- Circumvent sourcing from suppliers involved in illegal resource extraction, biodiversity loss, or social exploitation.
- Ensure materials used in construction do not originate from high-ESG risk areas unless adequate due diligence and verification have been conducted.
- Promote the use of low-carbon and energy-efficient building materials aligned with green building and climate goals.
- Source materials in compliance with all applicable environmental, labor, and human rights laws.
- Packaging and products should be designed for ease of disassembly and recyclability to support circular economy practices.
- Suppliers must provide Environmental Product Declarations (EPDs) or equivalent documentation for transparency regarding environmental performance.

### **3.16. Supplier Training**

- The Company ensures that suppliers and their workforce have access to the necessary infrastructure and resources to operate in a responsible and sustainable manner while working at Company-managed sites.
- The Company also provides appropriate and relevant information, guidance, and training to suppliers and their workers on key sustainability matters, enabling them to align with the Company's environmental, social, and governance expectations.

### **3.17. Zero Tolerance**

- Suppliers are expected to uphold fundamental standards that protect human rights, ensure fair and ethical practices, and safeguard the environment.
- When gaps or shortcomings are identified, the Company will work collaboratively with suppliers to support necessary improvements.
- However, if a supplier is unwilling to cooperate or fails to progress toward compliance, the Company reserves the right to discontinue the business relationship.

## **3. GOVERNANCE AND REVIEW**

- **Policy Owner:** Head of Procurement



- **Review:** This policy will be reviewed annually and updated in line with changes in law, standards, or business practices.

## 4. APPROVING AUTHORITY

- **Approved by:** Head of Procurement

Deep Nath Sharma

- **Effective Date:** 1<sup>st</sup> April 2024

## 5. APPENDIX

### Definitions

Term	Definition
<b>Bribery</b>	Offering or accepting anything of value in exchange for influencing a decision.
<b>Child Labour</b>	Work that deprives children of their childhood, education, and is harmful to physical and mental development.
<b>Conflict of Interest</b>	Any situation where an individual's personal interest could interfere with their duty to the Company.
<b>Confidential Information</b>	Any non-public information, proprietary data, trade secrets, and business operations details.
<b>Designated Persons</b>	Employees and insiders identified under SEBI regulations for compliance with insider trading norms.
<b>ESG</b>	Environmental, Social, and Governance, a set of standards measuring a company's impact and ethical behaviour.
<b>Ethics Committee</b>	A body appointed by the Company to oversee adherence to the Code.
<b>Forced Labour</b>	Work or service extracted from any person under the threat of penalty or without the person's voluntary consent.
<b>Insider Trading</b>	Buying or selling securities based on confidential, non-public information.
<b>LEED / IGBC</b>	Green building rating systems evaluating performance in energy, water, materials, indoor quality, and ecology. BPTP targets at least LEED Silver or IGBC Gold certifications.
<b>SEBI</b>	Securities and Exchange Board of India.
<b>UPSI</b>	Unpublished Price Sensitive Information, information that could materially affect the stock price of the Company if made public.

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