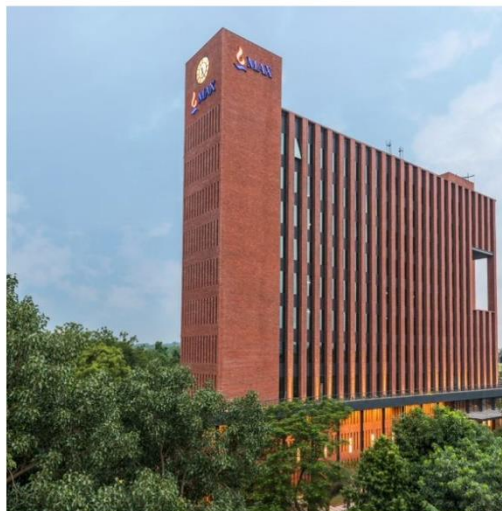
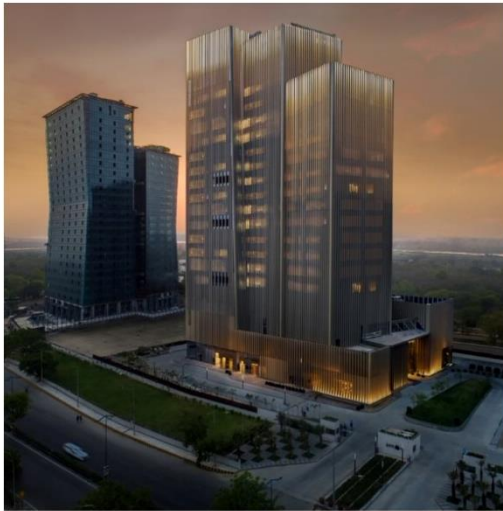




SEVABHAV | EXCELLENCE | CREDIBILITY

# Code of Conduct for Vendors and Suppliers

CORPORATE SUSTAINABILITY STRATEGY



MAX ESTATES LIMITED



# Contents

1. INTRODUCTION .....	2
2. PURPOSE .....	2
3. SCOPE.....	2
4. PRINCIPLES.....	2
5. GOVERNANCE .....	3
6. ANNEXURE I: MEL AND ITS SUBSIDIARIES .....	4

## 1. INTRODUCTION

Max Estates Limited (including its subsidiaries as mentioned in Annexure I) (collectively the “Company or MEL”) must always conduct its business activities with integrity and in full compliance with the laws and regulations that govern its global business activities.

## 2. PURPOSE

The Code of Conduct for Vendors/Suppliers reflects the Company’s values and commitment to Building a Better Tomorrow, including ethical business practices, the highest level of professional standards. At MEL, we value our vendors and suppliers as important partners in our business. We strive to maintain long-term, mutually beneficial relationships with all our vendors and suppliers.

## 3. SCOPE

### 3.1 Major inclusions and exclusions

The Company expects that its associates/vendors/contractors/supplier will share and embrace the letter and spirit of the Company’s commitment to integrity. The provisions of MEL’s Code of Conduct for Vendors & Suppliers apply to all associates/vendors/contractors/suppliers.

By “suppliers” we mean any firm or individual that provides a product or service to the Company. The Company understands that associates/vendors/contractors/suppliers are independent entities, but the business practices and actions of an associates/vendors/contractors/suppliers may significantly impact and/or reflect upon the Company, its reputation and brand, which is one of the Company’s most important assets.

## 4. PRINCIPLES

The objective of the Supplier Code of Conduct is to ensure that MEL’s suppliers, and other representatives, meet the expectations of doing business with respect to ensuring legal requirements, environmental, social and governance standards.

To ensure that all parties involved in these relationships are treated with respect and integrity, MEL has formulated the following set of principles to be followed by their suppliers and Vendors:

1. **Compliance with Laws and Regulations**

Vendors and suppliers must comply with all applicable laws and regulations in the countries where they operate, including environmental, health, safety, and labor laws.

2. **Ethical Conduct**

## Code of Conduct for Vendors and Suppliers

Vendors and suppliers must conduct their business with integrity and in an ethical manner, avoiding any conduct that could be considered bribery, corruption, or conflicts of interest. Any gifts or entertainment provided to our employees must be modest, appropriate, and legal.

### **3. Respect for Human Rights**

Vendors and suppliers must respect the human rights of their employees and ensure that their operations do not contribute to any human rights abuses. They must also comply with all applicable labor laws, including those related to child labor, forced labor, and discrimination.

### **4. Environmental Responsibility**

Vendors and suppliers must comply with all applicable environmental laws and regulations and strive to minimize the impact of their operations on the environment. They should also work to reduce waste and promote sustainable practices.

### **5. Quality and Safety**

Vendors and suppliers must provide products and services that meet our quality and safety standards. They should also take steps to ensure the safety of their employees and customers.

### **6. Confidentiality and Intellectual Property**

Vendors and suppliers must protect our confidential information and respect our intellectual property rights. They should not disclose or use our confidential information or intellectual property without our consent.

### **7. Business Continuity and Disaster Recovery**

Vendors and suppliers must have plans in place to ensure business continuity and disaster recovery in the event of an emergency or disaster.

### **8. Cooperation and Communication**

Vendors and suppliers should maintain open communication with us and work collaboratively to resolve any issues that may arise. They should also cooperate with us in any investigations or audits related to their business practices.

## 5. GOVERNANCE

- All suppliers are required to track, record and maintain details on aspects outlined in this Code of Conduct
- Any violations/incidents/accidents for workforce deployed at our sites should be communicated to MEL
- Based on the observations/findings raised during compliance audits, suppliers are required to provide corrective and preventive action plans within agreed timelines

## Code of Conduct for Vendors and Suppliers

- Suppliers are expected to carry out self-assessment for their compliance with this Code of Conduct
- Failure to comply with the Code of Conduct may result in termination of services as MEL's supplier

## 6. ANNEXURE I: MEL AND ITS SUBSIDIARIES

1. Max Estates Limited
2. Max Towers Private Limited (formerly Wise Zone Builders Private Limited)
3. Max Asset Services Limited
4. Max Square Limited (formerly Northern Propmart Solutions Limited)
5. Pharmax Corporation Limited
6. Max Estates 128 Pvt. Ltd. (formerly Accord Hotels and Resorts Private Limited)
7. Max Estates Gurgaon Limited