



## *SUPPLIER & VENDOR CODE OF CONDUCT*

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INDUS Realty Trust, Inc., together with its affiliates and subsidiaries (collectively, “INDUS”, “we”, “us”, or “our”), is committed to ethical business practices consistent with its **Code of Business Conduct and Ethics** and this **Supplier & Vendor Code of Conduct** (the “Code”) is an extension of that commitment. This Code covers a wide range of business practices and procedures. This Code is not intended to cover every issue that may arise, but instead sets out baseline principles and expectations to guide all vendors, suppliers, subcontractors, and consultants (each a “Vendor” and collectively, “Vendors”). We understand that Vendors are independent entities, but our Vendors’ business practices and actions can also impact and reflect on us. As such, we expect our Vendors to operate according to this Code.

### **The Code**

#### **Business Practices and Compliance**

Each Vendor, while conducting business on behalf of INDUS, must maintain ethical and professional standards and conduct its business in compliance with all laws and regulations applicable to such Vendor. These include but are not limited to the following:

- *Anti-Corruption, Anti-Bribery, and Anti-Money Laundering.* Vendors must comply with all applicable laws relating to anti-corruption, anti-bribery, anti-money laundering, and the prevention of fraud and other financial crimes.
- *Competition and Antitrust Laws.* Vendors must not engage in any illegal anti-competitive conduct, unfair market practices, or deceptive trade practices.
- *Insider Trading.* Vendors may not, directly, or indirectly, trade securities, including our securities, if they are in possession of material non-public information.
- *Conflicts of Interest.* Vendors should avoid conflicts of interests and situations that give the appearance of conflicts of interest.
- *Gifts and Entertainment.* When doing business with us, Vendors may, for legitimate business purposes, occasionally offer gifts and entertainment to, and accept them from, INDUS associates, in accordance with the INDUS Code of Business Conduct and Ethics policy. However, gifts and entertainment should never be used to gain an unfair advantage. Bribes, kickbacks, and similar payments are strictly prohibited.

- *Whistleblower / Grievance Mechanism.* Vendors should adopt a policy by which their employees can raise good-faith workplace concerns without fear of retaliation.

## **Human Rights**

We strive to respect and promote human rights in accordance with the United Nations Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights and we expect our Vendors to abide by these basic principles of respect and dignity for all people, regardless of sex, gender identity, religion, race, color, language, political or other opinion, national or social origin, property, birth or other status.

- *Slavery, Forced Labor, and Human Trafficking.* We do not tolerate slavery, forced labor, or human trafficking in any form and do not knowingly work with any Vendors who engage in such practices.
- *Child Labor.* Vendors should not employ child labor and must take the necessary preventative measures to ensure they do not employ anyone under the applicable legal minimum age of employment.

## **Employment Practices**

We encourage Vendors to follow the fundamental conventions as laid out by the International Labour Organization (“ILO”) which INDUS considers to be fundamental principles and rights at work, including: (i) freedom of association and protection of the right to organize; (ii) the effective recognition of the right to collective bargaining; (iii) the elimination of all forms of forced or compulsory labor; (iv) the effective abolition of child labor / the minimum age convention; (v) the equal remuneration convention; and (vi) the elimination of discrimination in respect of employment and occupation, including hiring practices.

INDUS places significant emphasis on the following employment practices and expects all Vendors to comply with the same:

- *Freedom of Association and Collective Bargaining.* Vendor shall respect, and shall not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.
- *Non-Discrimination, Abuse, or Harassment.* Vendor shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, color, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job. Vendor shall treat workers with respect and dignity. Vendor shall not subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment.
- *Labor and Employment Laws.* Vendors must comply fully with applicable wage and hour and benefits laws.

- *Health and Safety Laws.* Vendors must also comply with applicable health and safety laws and regulations. In addition, Vendors should provide a safe, healthy, and sanitary work environment, generally, and implement procedures and safeguards to prevent industry-specific workplace hazards.

## **Confidentiality and Data Protection**

Vendors must take appropriate steps to protect confidential, proprietary, and personal information.

- *Confidential Information.* Vendors must safeguard and not disclose any information, including our information, that has been labeled as confidential or could reasonably be expected to be confidential.
- *Intellectual Property.* Vendors must respect intellectual property rights.
- *Data Privacy.* Vendors must comply with all applicable data protection, privacy, and information security laws and regulations.
- *Data Breach.* Vendors should promptly notify INDUS if they reasonably believe that any confidential information, including personal information, they are handling for or on behalf of INDUS has been destroyed, lost, altered, accessed, or disclosed by an unauthorized third party.
- *Records Retention.* Vendors should create and maintain complete and accurate records to ensure accountability and retain and delete records in accordance with applicable law.

## **Sustainability and Environmental Stewardship**

INDUS is committed to sustainability and environmental best practices, and we expect our Vendors to conduct their operations in an environmentally responsible manner.

- *Environmental Laws and Permits.* Vendors must comply with all applicable environmental laws and maintain all required environmental permits and registrations.
- *Regulated Substances.* Vendors must comply with regulated substance and product content specifications and with any applicable laws prohibiting or restricting the use, content, or handling of specific substances.
- *Energy and Water Usage.* Acknowledging the right to clean drinking water as a basic human right, Vendors should strive to reduce water consumption where possible, in addition to implementing energy and waste minimization programs.
- *Sustainable Products and Services.* Vendors should strive to use and provide sustainability-certified materials, products, supplies, and services that align with industry best practices to reduce both adverse environmental and human health impacts.

## **Code Compliance and Right to Audit**

We expect our Vendors to share this Code with their employees and representatives and ensure that

they understand and adhere to it. Vendors should self-monitor their compliance, as well as compliance by their employees and representatives, with this Code. Vendors should consult with the INDUS's legal counsel on any matter related to actual or potential noncompliance. If we discover that a Vendor fails to report a known or suspected violation of this Code to us, we may terminate our relationship with such Vendor.

Additionally, INDUS reserves the right to conduct audits of its Vendors to ensure compliance with the Code. Audits resulting in non-compliance with legal requirements may result in the termination of business at INDUS's election.

If any Vendor becomes aware of a known or suspected violation to this Code, or has a grievance relating to such topics, it should be promptly reported to INDUS's designated Ethics Hotline at 1-800-398-1496.

### **No Creation of Third-Party Rights**

This Code does not confer, nor shall it be deemed to confer, any rights on the part of third parties, including any third-party beneficiary rights. No employees or representatives of a Vendor shall have any rights against INDUS by virtue of this Code, nor shall they have any rights to cause INDUS to enforce any provisions of this Code.