



HUMAN RIGHTS POLICY

INDUS Realty Trust, Inc. (“INDUS”) strives to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. This policy applies to INDUS and our affiliated entities. Our broader aim is to help increase the widespread recognition of human rights within the communities in which we operate. We are committed to engaging with all of our stakeholders in developing, implementing, and evaluating this policy’s effectiveness.

Diversity & Inclusion

We value and commit to advance diversity among our directors, our employees, our vendors, and everyone with whom we interact (“Stakeholders”). We strive to protect the rights of people of color, of women and of minority communities generally. We are committed to promoting equal opportunity for all qualified individuals in a workplace in which all Stakeholders have an opportunity to contribute to the success of our business and are valued for their skills, experience, and unique perspectives. We work to maintain workplaces that are free from discrimination or harassment on the basis of 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. We do not tolerate harassment, disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind.

Workplace Safety & Security

Our policy is to comply with applicable safety and health laws and regulations. In addition, we do not tolerate threats, threatening behavior, or acts of violence against employees, visitors, guests, or other individuals by anyone on company property. INDUS seeks to actively identify and promptly respond to health and security concerns of all Stakeholders.

Hiring, Work Hours, Wages & Benefits

INDUS complies with all laws regarding discrimination in the terms and conditions of employment. Although management is primarily responsible for ensuring equal employment mandates are adhered to, it is the collective interest of all INDUS employees to assure by their individual actions that the standards are effective and apply uniformly to everyone, without regard to any status protected by law. We strive to compensate employees fairly, and take measures to fully comply with applicable wage, work hours, overtime, and benefits laws. No employee or stakeholder will suffer retaliation as a result of making a good faith report or complaint under this section.

Freedom of Association and Collective Bargaining

We respect our employees' right to associate freely and to form, join or not join labor unions, without fear of reprisal, intimidation, or harassment. In the case of employees represented by a legally recognized union, we are committed to bargaining in good faith with that union.

Forced Labor, Human Trafficking, and Child Labor

We prohibit the use slavery, forced labor, or any form of human trafficking. We also prohibit the use of child labor, taking the necessary preventative measures to not employ anyone under the applicable legal minimum age of employment.

Water Resources

We recognize that the right to clean drinking water is a fundamental human right.

Training and Reporting for Employees

We strive to create workplaces in which open and honest communication among all employees is valued and respected. Through an annual training program, our employees grow their knowledge on topics including diversity, equity, and inclusion, as well as prevention of sexual or other forms of harassment in the workplace environment, anti-bribery and anti-corruption, as well as data privacy. Our employment policies inform our employees of our commitment on this subject.

Code Compliance

Any employee who would like to confidentially report a potential violation of this policy can raise his or her concerns to our General Counsel. Additionally, employees may also report any concerns anonymously through our designated Ethics Hotline at 1-800-398-1496.

If any Stakeholder becomes aware of a known or suspected violation of this Policy, or has a grievance relating to such topics, it should be promptly reported to INDUS's General Counsel or the Ethics Hotline.