



INDUS CHARITABLE GIVING POLICY

INDUS Realty Trust, Inc. (the “Company” or “INDUS”) recognizes the important role that charitable, non-profit organizations play in the lives of our employees and in the communities where we live and work. Therefore, the Company has established two (2) programs to support charitable giving, as outlined below.

Paid Volunteer Time

The Company encourages all employees to lend their volunteer support to programs that positively impact the quality of life in our communities. Accordingly, beginning with calendar year 2022, the Company has created a program for full time employees to use up to eight (8) hours of paid work time to participate in their chosen volunteer program(s).

To qualify, employees may only volunteer at organizations that are eligible (requirements and exclusions below). Each employee must seek and acquire approval from his/her manager, and volunteer time must not conflict with peak work schedules nor interfere with other work-related responsibilities. Ordinarily, volunteer time should be taken in blocks of at least four (4) hours to minimize the number of days absent from work.

Charitable Matching Program

In order to support the work of charitable organizations and encourage employee giving, INDUS has established a charitable matching program. Beginning with calendar year 2022, the program provides a dollar for dollar match of full-time employee contributions from a minimum of \$50 per contribution up to a maximum of \$2,000 per employee, per calendar year.

Eligible Organizations

- Charitable nonprofit organizations involved in education, social services or environmental health and safety activities.
- Institutions of higher education located within the United States.
- Organizations that are recognized by the Internal Revenue Service as a 501(c)(3) tax-exempt organization whose purpose is charitable or educational.

Ineligible Organizations

- Organizations that are identified more with specific groups of people rather than the general public, such as fraternity orders, labor organizations and entertainment organizations are not generally eligible.
- Religious or politically affiliated organizations are not eligible.
- Organizations that discriminate based on race, gender, ethnicity or creed are not eligible.

Ineligible Contributions

- Contributions that are merely pledged and not yet paid with the employee's personal funds.
- Contributions that provide the employee any benefits or privileges, such as membership dues, tickets to events, raffle tickets, subscription fees, etc.
- Contributions that discharge a legal obligation of the employee or any other person.
- In-kind or non-cash contributions, such as personal or real property, gifts or the value of personal expertise/volunteer work.

Procedures

- Employees must get prior approval of the organization from the Company's HR Director. Once approved, the employee must submit to the Company their eligible organization's matching grant form, which should specify the amount of the employee's donation, as well as confirmation of the charitable, non-profit status of the organization (including evidence or confirmation that the organization is exempt from tax by the IRS under Section 501(c)(3)).
- Once the Company receives the above documentation, the matching grant will be paid promptly and employees will be notified when their contributions have been matched.
- INDUS reserves the right to verify the eligibility of any contribution prior to paying a matching grant. The interpretation, application, and administration of the charitable matching program will be determined by INDUS and its decisions shall be final. The Company reserves the right to amend, modify or discontinue the charitable matching program, in whole or part, at any time without notice. All information regarding contributions made by employees will be treated as confidential.