



### 1. Accountability of an employee

It is essential to operate our business/operations in the most ethical and professional manner.

- An employee is expected to adhere, adopt and adapt the practices in business ethics as many of these practices attract legal / regulatory requirements.
- Violation of the laws applicable can create significance damage / liability for you/company or even to other employees. We expect the employees to scrupulously carry the accountability and comply.

### 2. Conflict of interest

A "conflict of interest" occurs when:

- **Personal interest:** - The personal interest of any member of the Board of Directors or the Senior Management interferes or appears to interfere in any way with the interest of the Company. Although this duty does not prevent them from engaging in personal transactions and investments, it does demand that they avoid situations where conflict of interest might occur or appear to occur.
- **Involvement/Interference:** - The Directors and the Senior Management are expected to devote their attention to the business interest of the Company. They are prohibited from engaging in any activity that interferes with their performance or responsibilities to the Company or otherwise is in conflict with or prejudicial to the Company.
- **Business Interests:** - If any member of the Board of Directors or the Senior Management considers investing in securities issued by the Company's customer, supplier or competitor, they should ensure that these investments do not compromise their responsibilities to the Company. Many factors including the size and nature of the investment; their ability to influence the Company's decisions, their access to confidential information of the Company, or of the other entity and the nature of the relationship between the Company and the customer, supplier or competitor should be considered in determining whether a conflict exists. Additionally, they should disclose to the Company any interest that they have which may conflict with business of the Company.

### 3. Use of assets and information confidentiality

- Ensure use of facilities and amenities provided to him / her by the company with care.
- Return the company property while leaving the company on discharge / termination / resignation.
- Not to disclose business strategies / operations to anyone.
- Not to take away confidential document / information either physically or through emails.
- Company's Email, Internal and Intranet are primarily use for company's business and not for personal gains.
- Not to send or browse discriminatory / obscene / objectionable pictures or matter.

**4. Confidential & Expense reports**

Each employee will conduct Company's business with integrity, in compliance with applicable laws and rules and in a manner that excludes personal gain.

- As per policy, employees would be reimbursed for expenses that are necessary and actually incurred when travelling and/or entertaining on authorized Company business.
- It is the responsibility of the employees to submit timely and accurate expense reports in compliance with applicable policy.
- Those authorized to approve expense reports are charged with ensuring that expenses submitted are in full accordance with the Company's policies, procedures and guidelines.
- Failure to file an expense report to account for Company funds, or submitting or approving false information can result in strict disciplinary action.

**5. Intellectual property**

Bagmane group and its employees must respect the intellectual property rights of others and take care to protect and maintain its intellectual property.

- "Intellectual Property" includes creative works, the owners of which have legal rights to them and include copyrights, patents, trade secrets and trademarks. Violation can result in substantial liability and in some instances, may even be criminal in nature.
- Any misuse, whether inside the Company or outside, of the Corporate Logo, Channel Logos, Stationery formats etc., must be promptly reported to Legal.

It is therefore very important that all employees take care not only to protect our intellectual property rights, but also avoid violating the rights of others.

**6. General standards of conduct**

The Company expects all Directors and the Senior Management to exercise:

- Good judgment, to ensure the interests, safety and welfare of customers, dealers, employees and other stakeholders and to maintain a co-operative, efficient, positive, harmonious and productive work environment.
- While discharging duties employee must act honestly and with due diligence, which an ordinary person is expected to behave in his/her own business.
- These standards need to be applied while working in the premises of the Company, at off-site locations where the business is being conducted. If the company-Sponsored business and social events, or at any other place whether they act as representatives of the Company.
- Facilitate Company in maintaining highest degree of Corporate Governance Practices.

Shall not communicate with any member of press or publicity media or any other outside agency on matters concerning the Company, except through the designated spokespersons or otherwise authorized.

**7. Treatment of Employees, Suppliers and Business Partners.**

We will treat employees fairly and use employment practice based on equal opportunity for all employees; we will respect the interests of employee in privacy and treat employees with dignity and respect. We are committed to providing safe and healthy working conditions and atmosphere of open communication for all our employees. We will deal fairly with our suppliers and partners; we will seek long business relationship without discrimination or deception.

**8. Equal Employment Opportunity.**

Bagmane will treat employees and applicants for employment for any level with fairly, based only on factors related to Bagmane's legitimate business interests. Bagmane adhere to entitled "Equal Employment/Affirmative Action" contains guidelines and requirements. Bagmane strives to assure that it has an enduring competitive advantage in the quality and competencies talent of its workforce and supports Initiatives "Managing Workforce Diversity."

**9. Work Environment.**

Bagmane is committed to providing its employees and business partner a workplace that is free from known safety and health hazards and a work environment free from any discrimination, race, colour, religion, sex, marital status, age, origin, physical and mental disability, sexual orientations or any other consideration protected by local law.

**10. Sexual Harassment.**

Bagmane is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. Bagmane will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. "Complaints Committee" is formed by the management team to investigate into the complaints of sexual harassment of the employees at workplace.

Reference to: Sexual Harassment Policy.

All efforts will be taken to maintain confidentiality and information will be revealed only on a "need to know" basis.

**11. Whistle-blower Policy.**

Bagmane “Whistle Blower Policy (“the Policy”) has been formulated with a view to provide a mechanism for employees of the Company to approach the Company. The purpose of this policy is to provide a platform to the employees:

Bagmane believes in fairness and transparency in the conduct of the affairs by adopting highest standards of professionalism, honesty, integrity and ethical behaviour. In light of the above, the Company has adopted to handle “Grievance mechanism policy” in the Code of Conduct which lays down the principles and standards that govern the actions of the Company and its employees. Any violation of the code is be perceived as a matter of serious concern for the Company and report to HR/ Top management. The Code casts the obligation upon the employees to report any actual or possible violation of the Code or an event or any occurrence the employee becomes aware of that could affect the business or reputation of the Company. We have kept a Drop Box at our head office and employees can drop their grievances Anonymous.

**12. Anti-Bribery or Anti –Corruption.**

The Anti-Bribery and Anti-Corruption Policy aims to ensure ethical business conduct among all Bagmane employees, directors, vendors and clients. It is applicable to business partners, including suppliers, distributors, contractors, intermediaries, consultants, agents and other third parties working for or on behalf of Bagmane, as well as government officers and employees.

BDPL Entities are dedicated to conducting business with integrity, transparency and compliance with anti-bribery and anti-corruption laws. The policy establishes guidelines to prevent bribery and corruption in all business activities and relationships.

Bribery involves offering, giving, receiving, or soliciting anything of value to influence actions, while corruption encompasses dishonest or unethical behavior seeking undue advantage or compromising business integrity. BDPL Entities, including directors, employees, contractors and representatives, must comply with all anti-bribery and anti-corruption laws in their respective regions.

Prohibited activities include no engagement in bribery, kickbacks, or improper payments. Strict prohibition of facilitation payments for routine government actions. Gifts, hospitality and entertainment should be transparent, reasonable and non-influential. Charitable or political donations must comply with laws and be transparent.

BDPL Entities will conduct due diligence on third parties to ensure compliance with anti-bribery and anti-corruption standards. Reporting violations is encouraged and there is a confidential reporting mechanism for employees without fear of retaliation.

Gifts and hospitality guidelines include approval for transactions exceeding predefined limits and transparent recording in company records.

Regular training on anti-bribery and anti-corruption policies will be provided to employees and stakeholders. Non-compliance may result in disciplinary actions, legal consequences and potential termination.



Monitoring and review will include periodic evaluations of the policy to ensure effectiveness and compliance with evolving laws. BDPL Entities strictly prohibit facilitation payments, gifts, entertainment, kickbacks and nepotism. Thorough investigations by compliance and legal departments will be conducted for suspected corruption or bribery, with results communicated to stakeholders. Violations may result in warnings, suspension, termination, or legal action, depending on the severity of the offense.

This policy reflects BDPL Entities' commitment to ethical business practices and high integrity standards. All personnel are expected to uphold these principles in their daily activities. BDPL Entities adopt a zero-tolerance approach to corruption and bribery, emphasizing ethical conduct and employee protection. All concerns or violations will be treated seriously and addressed promptly.

### **13. Zero tolerance to misconduct.**

All employees, vendors, dealers and distributors, suppliers and contractors of this Organization are expected to observe the highest standards of ethics during performance of their services so as to avoid misconduct.

### **14. Disciplinary action.**

The Company intends to prevent the occurrence of conduct not in compliance with this Code of Conduct, applicable laws and other policies, procedures and guidelines prepared by the Company. The allegations of non-compliance or reported violations with the Code of Conduct will be investigated whenever necessary and evaluated at proper level(s). Those found to be in violation of this Code of Conduct are subject to appropriate actions up to and including termination of employment / future business with the company. Criminal misconduct may be referred to the appropriate legal authorities as per Law.

### **15. Diversity, Anti – Discrimination and Anti – Harassment.**

Bagmane committed to provide work environment free of discrimination harassment. We prohibit discrimination/harassment in the workplace, whether committed by or against managers, co-workers, customers, vendors, or visitors. All the employees to work and develop in an environment that is respectful and productive, anti- discrimination or harassment based on an employee's race, colour, religion, sex, national origin, citizenship, age status, sexual orientation, disability, marital status, or any other basis prohibited by law, will not be tolerated.

Bagmane always treat employees and applicants for employment for any level with fairly, based only on factors related to Bagmane legitimate business interests.

Bagmane adhere to entitled "Equal Employment/Affirmative Action" contains guidelines and requirements. Bagmane strives to assure that it has an enduring competitive advantage in the quality and competencies talent of its workforce and supports Initiatives "Managing Workforce Diversity."

**16. Prohibition of Child Labour Employment.**

Bagmane will comply with all the provisions of “Child Labour (Prohibition and

Regulation) Act, 1986 and all other applicable labour laws as per the governing authorities in relation to the labours , including those related to wages, working hours, overtime and working conditions and basic requirements.

The company is against all forms of exploitation of children. The company does not provide employment to children before they have reached the statutory age to have completed their compulsory education, as defined by the relevant authorities, Bagmane take proclaiming statement from contractors, vendors and sub vendors, If it is found that the vendors or external parties associated with or engaged by the company have employed children in violation of these Principles and statutory provisions of child labour, the company will take serious action, including discontinuation of the Business relationship.

It is the responsibility of contracts department and all site head of the department and as a whole Human Resource Department to ensure the compliance with this policy at all company locations.

**17. Modern Slavery & Human Trafficking:**

Bagmane commitment to preventing - slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small; employees are expected to report their concerns and management to act upon them. This Statement affirms its intention to act ethically in our business relationships. The following policies are in our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

Such as:-

1. Whistleblowing policy.
2. Dignity at Work and Equal Opportunities Policies.
3. CSR
4. Terms & Conditions of Vendors concerning their responsibilities towards their stakeholders and the environment.

**18. Freedom of Association and Collective Bargaining (Protection of the Right Act)**

Right to Organise and Collective Bargaining Convention, these rights are essential for the exercise of human rights. Freedom of association is most frequently understood as the right of workers “to join organisations of their own, choosing without previous permission.” The freedom of association is therefore a pre requisite to collective bargaining, which is defined as “negotiation between employers or employers' organisations and workers' organisations, with a view to the regulation of terms and conditions of employment by means of collective agreements.” In other words, “a way for workers and employers to reach collective agreement on the issues affecting the world of work.” As code of conduct Bagmane usually having a common viewpoint or purpose and often exercising the right to assemble and right to speech.

**19. Antitrust and Anti-Competitive Practices.**

BDPL Entities are committed to fair competition and ethical business practices. Antitrust laws exist to promote fair competition and prohibit anti-competitive practices. Employees, contractors and representatives must comply with antitrust laws to ensure a level playing field and maintain the integrity of the market.

- Prohibiting agreements with competitors to fix prices or manipulate market conditions.
- Avoiding agreements to divide markets or customers with competitors.
- Prohibiting collusion in bids to manipulate the competitive bidding process.
- Restricting sharing sensitive information with competitors that could harm competition.
- Avoiding exclusive agreements that restrict competition unfairly.

**20. Money Laundering or Insider Trading.**

BDPL Entities prohibit money laundering and insider trading to maintain financial integrity and protect against unethical practices. Employees, contractors and representatives must adhere to laws and regulations governing financial transactions and securities trading.

- Insider Trading: Prohibiting trading securities based on material non-public information.
- Money Laundering: Reporting suspicious financial transactions and complying with anti-money laundering laws.
- Preventing Fraud: Encouraging honest financial reporting and avoiding fraudulent activities.
- Ethical Investments: Discouraging investments that may support unethical or illegal activities.

**21. Environment, Health and Safety (EHS) Policy.**

BDPL Entities prioritize a safe and healthy working environment, environmental sustainability and compliance with EHS regulations. Employees, contractors and representatives must contribute to a safe workplace and environmentally responsible practices.

- Complying with safety guidelines, using protective equipment and reporting hazards.
- Understanding and following procedures for emergencies and evacuations.
- Environmental Responsibility: Reducing environmental impact, conserving resources and promoting sustainability.
- Health and Wellness: Encouraging employee well-being and providing resources for a healthy lifestyle.
- Regulatory Compliance: Adhering to local, national and international EHS regulations.

**22. Compliance and Enforcement:**

Violation of this Code of Conduct may result in disciplinary action, including termination. Employees are encouraged to report violations through appropriate channels without fear of retaliation.

This Code of Conduct is designed to uphold ethical standards, legal compliance and responsible corporate citizenship. All employees are responsible for understanding and adhering to these policies. Violations will be investigated and appropriate actions will be taken.

**Dated: March 16, 2025**



## **GENERAL SCOPE**

The role of the ESG Committee (erstwhile, “Sustainability Committee”) has been established to assist the Board in meeting its responsibilities in relation to the Environmental, Social and Governance (ESG) matters arising out of the activities and operations of the Company and its subsidiary companies (the Group) for aiming towards enhanced sustainable development.

Sustainable development is a pattern of development through which the business is able to identify the pertaining ESG risks beyond just financials, which, in turn, guides the strategic actions of the business to meet the needs of the present without compromising the ability of future generations to meet their own needs.

## **AUTHORITY**

The Committee is authorised to:

- Seek any information it requires from any employee of the Company;
- Obtain outside legal or other independent advice on matters within its terms of reference; and form advisory or steering groups to provide focus or advice on matters within its terms of reference.

## **MEMBERSHIP**

- The Board shall appoint the Members of the Committee and appoint Chair of the Committee (the Committee Chairperson) (who will be a non-executive director).
- The ESG Committee shall have a minimum of three members including one independent non-executive director of the Company. Other members of the Committee may be appointed on the recommendation of the Group CEO with the approval of the Board.

## **SECRETARY AND MINUTES**

- The Company Secretary shall act as a secretary to the Committee (the Committee Secretary).
- The Sustainability Head will co-ordinate with the ESG Committee and CS for carrying out the meetings and operations of the Committee.
- All meetings of the Committee will be duly minuted. Minutes shall be first approved by the Committee and thereafter noted by the Board as well.

## **MEETINGS**

- The Committee shall meet at least once each quarter or at more frequent intervals as may be deemed appropriate. Meetings of the Committee shall be convened by the Committee Secretary at the request of the Committee Chairperson.
- Meeting agendas and papers shall be sent to each member of the Committee no less than seven days prior to the meeting.
- The quorum for any meeting of the Committee shall be any two Members with presence of at least one Board Member.
- In the absence of the Committee Chairperson, the remaining members present shall elect one of themselves to chair the meeting.

## **AREAS**

Worker health and safety; workplace conditions, supply chain sustainability, environmental matters including water, waste, biodiversity, and air quality management; emissions and climate change; corporate social responsibility; engagement with communities; business continuity planning; emergency response plans; diversity and human rights



## **DUTIES**

The Committee shall:

- Review Group policies, Standards, Guidelines, and action plans regarding the sustainable development of the company's projects and operations, comprising social, economic, and environmental responsibility in the regions where the Group operates.
- Review targets for ESG performance and report to the Board with respect to their appropriateness, time-horizons, and ambition and assess progress towards achieving those targets
- Seek updates on the management of material ESG issues from the respective functional and business heads
- Review and report to the Board the performance of the Group and its Group companies with respect to the implementation of ESG Management Systems designed to ensure that the commitments made in the policy are being met and that sustainability and reputational related risks are being assessed, controlled and managed effectively. This includes existing HSE & Sustainability topics such as climate, safety, and human rights as well as emerging risk areas
- Seek updates on how ESG is being institutionalized across all levels of the organization
- Recommend, when appropriate, amendments to the Sustainability & ESG policies or management systems
- Review the methods of communicating sustainability performance, including approving the Sustainability Report and the ESG, and BRSR sections published in the Integrated Annual Report prior to publication as deem fit
- Advise the Board on the aspects of diversity (including but not limited to: gender, qualifications, representation, etc.) that need to constitute the leadership committees (including the Board) of the organization in order to drive an ESG culture across all aspects of decision-making;
- Advise the Board to enable it to discharge its responsibilities, having regard to the law and the expected international standards of sustainability & governance;
- Review public and media reports in relation to the Health, Safety, Environment and Sustainability performance
- Perform such other duties and responsibilities as are consistent with the purpose of the Committee and as the Board or the Committee shall deem appropriate

## **REPORTING RESPONSIBILITIES**

The Committee shall report on its proceedings to the Board of Directors from time to time.

## **DELEGATION OF AUTHORITY**

The ESG Committee may form, and delegate authority to, sub-committees comprised of one or more members of the Committee, as appropriate. Each sub-committee shall have the full power and authority of the Committee, as to the matters delegated to it.

## **APPROVAL AND REVIEW**

The ESG Committee Terms of Reference and any amendments thereto shall be approved by the Board. The ESG Committee shall review its own terms of reference and performance once a year to ensure its relevance and its effectiveness.

**Dated: March 16, 2025**



## Grievance Redressal Policy

### BAGMANE

At Bagmane, our unwavering commitment to fostering an environment of transparency, accountability and ethical business conduct led us to formulate a robust Grievance Redressal Policy. This policy is not just a set of rules; it's a comprehensive framework designed to address grievances promptly and effectively, aligning with national guidelines on responsible business conduct and human rights principles.

Our policy encompasses crucial elements vital for an effective and responsive grievance redressal system. These include clearly defined roles and responsibilities, user-friendly channels for submitting grievances, prompt acknowledgment procedures, thorough review and investigation steps, transparent communication channels and a steadfast commitment to maintaining confidentiality and privacy. Additionally, the policy places a strong emphasis on continuous monitoring and reporting mechanisms, aimed at assessing and enhancing the overall effectiveness of the grievance redressal process.

- We designate Grievance Officers to provide oversight and ensure the smooth functioning of the redressal process.
- Clearly outlined Procedure/process for internal and external grievance redressal, roles and responsibilities of individuals or departments involved in handling and resolving grievances, ensuring accountability at every level.
- Stakeholders are empowered to submit grievances (online and offline Grievance redressal) through various channels, such as online forms, email, or a dedicated hotline.
- We specify the necessary documentation, ensuring a streamlined and efficient submission process.
- Grievances are promptly acknowledged and clear expectations for response times are set, demonstrating our commitment to timely resolution.
- We detail a comprehensive process for reviewing and investigating grievances, involving all relevant parties and ensuring the collection of necessary evidence.
- Transparent communication with the grievant is a priority, with regular updates provided throughout the grievance resolution process.
- We commit to maintaining the confidentiality of sensitive information and adhere strictly to data protection and privacy regulations.
- The policy includes a robust system for continuous monitoring and reporting, utilizing metrics and key performance indicators to gauge the effectiveness of the grievance redressal process.
- The policy not only addresses grievances related to national business conduct guidelines but also extends its coverage to modifications or introductions of business processes resulting from complaints. Furthermore, specific mechanisms are outlined for receiving and redressing grievances for different categories of employees and workers.
- Internally, our policy establishes robust mechanisms specifically tailored to redress grievances related to human rights issues, showcasing our unwavering commitment to ethical business practices.
- In alignment with our commitment to continuous improvement, our Grievance and Redressal Policy incorporates a structured feedback mechanism. This mechanism aims to gather insights, identify areas for improvement and enhance our overall approach to grievance handling and resolution.

Bagmane Developers Pvt. Ltd. strives not only to address grievances effectively but also to instil confidence among stakeholders through responsible business practices and ethical conduct.

**Dated: March 16, 2024**

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## Data Privacy Policy

Bagmane processes consumer data to enhance customer experience. The information, including Personal Data of individuals such as employees, customers, suppliers and business partners, is collected, stored, transferred and processed automatically or manually.

This policy applies to all Bagmane entities, encompassing employees, consultants, interns, contract workers, associates and temporary employees. It also extends to suppliers, vendors and third parties globally who have access to Personal Data from Bagmane. Additional or alternative policies for specific jurisdictions require approval by the Head of IT. Partners and third parties handling Personal Data for Bagmane must read, understand and comply with this policy. Third-party compliance is ensured through agreements and confidentiality measures.

The lawful basis for processing data is specified and Bagmane prioritizes data security. Industry-standard measures are employed to prevent unauthorized access, disclosure, alteration, or destruction. Data is not shared with third parties unless necessary for services or required by law. Cross-border data transfers comply with data protection laws and appropriate safeguards are in place.

As a data subject, you have the right to access, rectify, or delete your personal information. In case of a data breach, Bagmane commits to notifying affected individuals and relevant authorities promptly, conducting investigations, implementing corrective actions and continuously improving security measures.

Bagmane takes consumer complaints seriously and addresses them promptly, including issues related to advertising, delivery of essential services, cyber security and data privacy. Corrective actions are taken and Bagmane is committed to complying with all regulatory requirements.

Bagmane has a comprehensive cyber security framework/policy regularly updated to adapt to evolving threats and technologies. The Data Privacy Policy is effective from a specified date and regular reviews are conducted. The MD ensures compliance with the policy, overseen by the Corporate Data Privacy Officer (CDPO). Questions about policy implementation should be directed to the CDPO.

Definitions of terms like Personal Data, Sensitive Data, Anonymization, Commissioned Processing, Data Controller, Data Processor, Data Recipient, Data Subject, Opt-in and Consent are provided.

The policy is based on principles such as protecting individual rights, fair and legal data processing, obtaining data only for specific purposes, maintaining accurate data and not retaining data longer than necessary. Controls include physical, technical and procedural measures, obtaining consent, safeguarding Sensitive Data and following data transfer, disclosure and security controls.

Data Subject Rights, Data Quality Assurance, Retention and Deletion, Notification to Authorities, Third-Party Data Processors, Employee/Individual Obligations, Consequences of Violations and Data Security Controls are outlined. Special rules for specific countries, compliance and references to acts like the Personal Data Protection Bill, GDPR and IT Act are also covered.

To ensure responsible processing of Personal Data, Bagmane follows these principles, aligning with applicable laws:

- Data processing must safeguard the individual rights of Data Subjects, ensuring fairness and adherence to legal provisions.
- Personal Data shall only be collected for specified, explicit, lawful and legitimate purposes, avoiding further processing incompatible with those purposes.
- Data collected should be adequate, relevant and not excessive for the intended purposes.
- Personal Data must be accurate, complete and current, aligning with the purposes for



lection and processing.

BAGMANE

- Personal Data should not be retained for identification beyond the necessary timeframe for the permitted purposes.
- Personal Data may only be processed if it meets specific criteria, such as contractual obligations, legal compliance, vital interests, public tasks, legitimate interests, or with the Data Subject's informed consent.
- Processing of Personal Data should respect and align with the rights of Data Subjects.
- Adequate physical, technical and procedural controls will be implemented to prevent unauthorized processing, collection, or transmission of Personal Data and to prevent accidental loss or destruction.
- Processing of Personal Data is permissible with the informed, express and freely given consent of the Data Subject.
- Sensitive Data shall only be processed under specific conditions, such as legal authorization, explicit consent, preventive medicine or healthcare treatment, protection of vital interests, or incapacity of the Data Subject to give consent.
- Personal Data shall not be transferred without ensuring a required level of Data Privacy. Recipients must only use Personal Data for authorized purposes, maintaining confidentiality.
- Undertaking new or expanded Personal Data collection or processing activities requires approval from the Chief Data Privacy Officer (CDPO).
- Clear disclosures are made to Data Subjects at the time of data collection, providing essential information and ensuring fair processing.
- Personal Data shall be collected directly from the Data Subject unless specific business purposes necessitate collection from other sources.
- Data Subjects have rights to access, correction, deletion and objection to their data processing, which will be acknowledged and addressed promptly.
- Employees are responsible for maintaining complete, accurate and updated Personal Data.
- Personal Data will be retained based on legal or business requirements and internal audits will ensure compliance with data privacy policies.
- BAGMANE shall notify Data Privacy authorities as required by jurisdictions, ensuring timely and up-to-date notifications.
- Third-party processors must adhere to security measures and BAGMANE will conduct regular checks to ensure compliance.
- Employees and Relevant Individuals must comply with applicable data privacy laws, policies and practices, ensuring secure handling of Personal Data.
- Non-compliance may lead to disciplinary actions, including termination, recognizing the seriousness of breaches.

To ensure the security of Personal Data, Bagmane Entities implement physical, technical and organizational controls. These measures aim to prevent alteration, loss, damage, unauthorized access, or processing, considering the state of technology, data nature and potential risks. The security controls include:

- Restricting unauthorized individuals from physically accessing systems processing Personal Data.
- Preventing unauthorized use of data processing systems.
- Limiting authorized users' access to data as per their needs, preventing unauthorized actions during processing.
- Securing Personal Data during electronic transmission or storage, preventing unauthorized reading, copying, modification, or removal.
- Ensuring the ability to verify who entered, modified, or removed Personal Data from data processing systems.
- Ensuring commissioned processing of Personal Data follows the Data Controller's instructions.
- Safeguarding Personal Data against undesired destruction or loss.

- Processing data collected for different purposes separately.
- Ensuring data isn't kept longer than necessary, requiring return or destruction of transferred data.
- All individuals involved in processing Personal Data must adhere to confidentiality requirements, continuing even after the employment relationship ends.
- While this policy sets a minimum global standard, Bagmane acknowledges that local laws may require stricter standards. Entities can follow local law, with Data Privacy Officer Approval for specific conflicting parts.
- Every employee is responsible for understanding and complying with this policy, ensuring adherence to Data Privacy laws. Breaches are considered serious and may lead to disciplinary actions, including termination.
- The Chief Data Privacy Officer (CDPO) will inform the Audit Committee of potential criminal and civil liabilities, fines, imprisonment and damages for non-compliance with Data Privacy legislation. Personal liability for the CDPO may arise in specific situations.
- The Corporate Data Privacy Officer will define controls and Key Performance Indicators (KPIs) to measure policy efficiency. The Audit Committee will review these controls annually.

#### Definitions:

- **Personal Data:** Refers to information about a living individual that can identify them, either directly or in combination with other data held by a Data Controller or Data Processor. This includes but is not limited to full name, address, email, date of birth, marital status and other personally identifiable information.
- **Sensitive Data:** Encompasses Personal Data related to an individual's intimate sphere or with a significant impact on them. Examples include passwords, race, religious beliefs, political opinions, health information, sexual history and biometric data.
- **Anonymization or De-identification:** The process of redacting identifying information from Personal Data to ensure the individual's identity cannot be determined or requires disproportionate effort.
- **Commissioned Processing:** Occurs when the Data Controller determines the purpose and means of processing and the Data Recipient processes data on behalf of and according to the Data Controller's instructions.
- **Data:** Information processed automatically or manually, including digital data and accessible records about an individual.
- **Data Controller:** The entity determining the purposes and manner of Personal Data processing; generally BAGMANE itself.
- **Data Processor:** A person processing data on behalf of the Data Controller.
- **Data Recipient:** A person, entity, or authority receiving disclosed Personal Data, including BAGMANE Entities' insurers, banks, auditors and business associates.
- **Data Subject:** The natural person to whom Personal Data refers, including customers, web users and employees.
- **Opt-in:** Obtaining specific consent from the Data Subject before processing their personal information.
- **Processing:** Operations on data, such as organization, adaptation, disclosure, alignment and destruction.
- **Relevant Filing System:** Information about individuals, whether manual or electronic, structured for easy access.
- **Technology:** Broadly interpreted to include means of collecting, storing, or processing data.
- **Employee:** Current or former employees of Bagmane Entities, covered throughout the employment cycle.
- **Third Party:** Parties associated with Bagmane Entities, excluding internal stakeholders.



- **Consent:** Freely given indication of agreement for Personal Data processing, following an "opt-in" approach and being revocable. Consent is specific to disclosed purposes and new activities require additional consent.

#### **References to Applicable Acts:**

This policy aligns with relevant legislation, including the Personal Data Protection Bill, GDPR, Information Technology Act, 2000 and the Information Technology Rules, 2011.

The policy undergoes annual reviews and amendments automatically incorporate changes in applicable laws or facts. It aligns with global standards and updates are communicated to all stakeholders to ensure alignment with evolving standards and practices.

**Dated: March 16, 2025**





## 1. INTRODUCTION

This Sustainable Procurement Policy is a vital component of Bagmane's Sustainability agenda. It defines our formal procedures and principles for the acquisition of goods and services, ensuring the inclusion of environmental and health considerations.

We place high priority on environmental and social sustainability. We are dedicated to responsible business practices that protect the environment, enhance operational performance through best practices, and drive business growth within our supply chain.

Our sustainable procurement policy is a cornerstone of our commitment to environmental stewardship and social responsibility. As a leading real estate developer, we recognize our role in influencing the supply chain towards more sustainable practices.

## 2. SCOPE

This policy applies to all procurement activities within our organization, including the selection and management of suppliers, contractors, and subcontractors involved in our real estate development projects and operations.

## 3. OUR COMMITMENT

Bagmane is firmly committed to good corporate governance, sustainable development, and the pursuit of both short-term and long-term sustainability goals. Our Green Procurement Policy guides us in making purchasing decisions that are socially and environmentally responsible. It enhances operational efficiency, mitigates regulatory and other risks, and strengthens our position as a sustainable brand. We recognize that sustainable business practices are essential and integrate them into our overall sustainability strategy and governance.

Our commitment includes:

- **Environmental Responsibility:** Reducing the environmental impact of our procurement activities by selecting eco-friendly products and services.
- **Social Responsibility:** Ensuring fair labour practices and promoting health and safety within our supply chain.
- **Economic Responsibility:** Supporting local economies and promoting the use of sustainable and local technologies and materials.

## 4. PROCUREMENT POLICY

To achieve our sustainability goals, we will:

### **Engage with Suppliers:**

- Collaborate with suppliers who demonstrate a commitment to sustainable practices.
- Encourage suppliers to adopt environmentally and socially responsible practices throughout their operations.



- Ensure fair and transparent procurement processes that promote competition, equal opportunity and responsible pricing.

**Sustainable Products and Services:**

- Prioritize products that are eco-friendly, energy-efficient, and have low environmental impact.
- Select products with recognized green certifications, such as BEE ratings or Eco Labels and environmental product declarations (EPD), Health product declarations (HPD, where possible

**Waste and Resource Management:**

- Promote the use of recycled or partially recycled products.
- Optimize and de-carbonize logistics to reduce carbon footprint and promote local purchasing.
- Promote circular economy principles, including the 4 Rs (Reduce, Recover, Recycle, Reuse).

**Health and Safety:**

- Procure less toxic products and chemicals to mitigate health risks.
- Mandate a safe and healthy workplace for all suppliers
- Implement a zero tolerance regime for child labour, forced labour, workplace discrimination, harassment, bribery, fraud, embezzlement and the use of conflict minerals or resources.

**Performance Monitoring and Improvement:**

- Continuously monitor and evaluate the sustainability performance of our procurement processes through audits
- Identify opportunities for improvement and implement best practices in sustainable procurement.

**Education and Awareness:**

- Raise awareness and build capacity on sustainability issues among suppliers.
- Encourage self-assessment by suppliers on key ESG parameters
- Ensure that employees involved in procurement and supply chain management receive the necessary training and knowledge to implement responsible sourcing practices.

## 5. POLICY REVIEW

This policy will be periodically reviewed and updated by the Procurement and Corporate Sustainability teams to ensure it remains relevant and effective. Feedback from stakeholders, including suppliers and employees, will be considered in the review process.

By adhering to this sustainable procurement policy, Bagmane aims to lead by example in promoting sustainability within the real estate development sector and beyond.

**Dated: March 16, 2025**



At Bagmane, we recognize the critical importance of cyber security in maintaining the integrity, confidentiality and availability of information. Our Cyber Security Policy is designed to create a secure operating environment for our business operations and uphold our competitive edge, profitability, legal compliance and company image.

This policy applies to all employees, directors, consultants, interns, contract workers, associates and temporary employees of Bagmane. Additionally, third-party service providers are required to comply with this policy when handling data outside Bagmane premises.

The purpose of this policy is to:

- Protect Bagmane's data and infrastructure.
- Outline protocols and guidelines governing cyber security measures.
- Define rules for company and personal use of IT resources.
- Specify the disciplinary process for policy violations.

The Head of Information Technology is responsible for maintaining compliance with this policy. Queries regarding policy implementation should be directed to the Information Technology department.

**Our Commitment:**

- Protect sensitive information from unauthorized access.
- Safeguard the accuracy, completeness and timeliness of information.
- Ensure information and vital services are accessible to authorized users.
- Authenticity, Non-repudiation, Identification, Authorization, Accountability and Auditability are addressed in this policy.
- To reduce the risk of cyber-attacks and enhance our security posture, Bagmane shall implement measures covering access management, information security planning and procedures, reporting of security weaknesses, security incident management processes, information security risk assessment and information security audits.
- Identify a CISO (Chief Information Security Officer) responsible for coordinating security policy compliance efforts and interacting with relevant authorities.
- Implement secure authentication for network and internet access.
- Prohibit activities bypassing security measures or changing network configurations without permission.
- Evolve the security plan based on changing dynamics and assessment results.
- Establish procedures for reporting observed or suspected security weaknesses promptly.
- Define incident response procedures, business recovery and continuity plans.
- Mobilize and test incident response plans at least once a year.
- Deactivate/remove devices posing threats under implementing authority.
- Conduct periodic risk assessments twice a year.
- Evaluate adequacy and effectiveness of technical security control measures.
- Perform tests after significant changes to IT systems or networks.
- Conduct annual information security audits by an independent IT Security Auditing organization.
- Conduct regular awareness programs for employees on cyber security policies, threats and proper use of information processing facilities.
- The policy is communicated to all relevant stakeholders.
- This policy will automatically stand amended to accommodate changes in applicable law or relevant facts.
- This Policy is updated annually, considering reviews and feedback to ensure continuous improvement and alignment with evolving standards and practices.

Bagmane is committed to maintaining a robust cyber security framework to protect our data, infrastructure and uphold our commitment to information security.

**Dated: March 16, 2025**