



Supplier Code of Conduct

Purpose:

Mahindra Holidays & Resorts India Limited (hereby referred to as “MHRIL”) is committed to conducting business responsibly, ethically and in alignment with the Mahindra Group’s values of integrity, accountability and respect for individuals and the environment. This Supplier Code of Conduct (“the Code”) defines the minimum standards and expectations for suppliers who provide goods, services or labour to MHRIL.

This Code aligns with the Mahindra Group’s Sustainability & Environmental Policy and Sustainable Supply Chain Policy, and reflects the Group’s expectations on responsible and sustainable business conduct.

Compliance with this Code is mandatory for all suppliers and their subcontractors.

Scope & Applicability:

This Code applies to all suppliers, vendors, contractors, consultants, service providers, labour providers and partners who work with or on behalf of MHRIL.

Suppliers must ensure that their employees, subcontractors and associated partners comply with this Code and applicable laws.

Standards of Conduct Required from Suppliers

1. Ethical Business Conduct

Suppliers must conduct business with professionalism, honesty and integrity, ensuring fair and transparent practices.

1.1. Anti-Corruption & Anti-Bribery

Suppliers shall not offer, give, request or accept bribes, kickbacks, facilitation payments or improper personal benefits. All business dealings must be transparent and accurately recorded.

1.2. Conflict of Interest

Suppliers shall avoid situations that may create an actual or perceived conflict of interest. Any potential conflict must be disclosed to MHRIL promptly.

1.3. Anti-Competitiveness

Suppliers shall not engage in practices such as price-fixing, bid-rigging, market allocation or any form of unfair

competition.

1.4. Confidentiality & Data Protection

Suppliers must safeguard confidential and proprietary information received from MHRIL and use such information only for legitimate business purposes, in accordance with applicable data protection and confidentiality requirements.

2. Compliance, Reporting & Corrective Action

2.1. Legal Compliance

Suppliers must comply with all applicable laws, regulations and industry standards relating to labour, ethics, safety, and the environment.

This includes compliance with all applicable environmental laws and regulations related to emissions, waste management, water use, pollution prevention, resource consumption and product stewardship.

2.2. Monitoring & Assessments

MHRIL reserves the right to conduct assessments, audits or reviews to verify supplier compliance with this Code. Suppliers are expected to cooperate fully and provide relevant documentation or access as required.

2.3. Grievances & Reporting Violations

Suppliers must maintain channels for workers to report concerns without retaliation. Suppliers may also report concerns directly to MHRIL through designated ethics or grievance mechanisms.

2.4. Corrective Actions

Non-compliance may require corrective action plans. Severe or repeated violations may lead to suspension or termination of the business relationship.

3. Labour & Human Rights

3.1. Child Labour

Suppliers shall not employ individuals below the minimum legal working age. No person under 18 may be employed in hazardous or unsafe conditions.

3.2. Forced Labour

Suppliers shall not use forced, bonded, trafficked or involuntary labour. Workers must be free to enter and terminate employment voluntarily.

3.3. Working Conditions

Suppliers must comply with legal requirements on:

- Working hours
- Overtime
- Rest periods
- Wages and benefits
- Lay-off and termination practices
Employment terms must be communicated clearly and transparently.

3.4. Freedom of Association & Collective Bargaining

Suppliers shall respect the rights of workers to join or form associations, unions or representative bodies and to engage in collective bargaining, consistent with applicable law.

3.5. Non-Discrimination & Anti-Harassment

Suppliers must ensure equal opportunity and shall not discriminate based on gender, caste, religion, disability, age, marital status, race, ethnicity, sexual orientation or any legally protected characteristic. Harassment, abuse, intimidation or any behaviour undermining personal dignity is strictly prohibited.

4. Health, Safety & Working Environment

Suppliers must:

- Provide a safe and healthy workplace
- Maintain appropriate safety infrastructure, PPE and emergency systems
- Train workers in safe work practices

- Prevent accidents, injuries and occupational illnesses

Tier 1 suppliers whose services are critical to resort operations or involve environmental or operational risks (such as fresh water suppliers, water treatment, waste management, fuel supply, food supply, laundry services, IT systems, etc.) must maintain basic incident response and emergency preparedness procedures relevant to their operations.

Suppliers working at MHRIL premises must follow all MHRIL safety protocols.

5. Environmental Responsibility

5.1. Greenhouse Gas Emissions & Energy Use

Suppliers are expected to monitor their greenhouse gas emissions and energy consumption and work progressively towards improving energy efficiency and reducing emissions relevant to the services or goods provided to MHRIL.

5.2. Pollution Prevention & Waste Management

Suppliers shall:

- Prevent pollution from air, water, soil or noise
- Manage waste responsibly
- Ensure proper disposal of hazardous and non-hazardous waste
- Avoid practices that create environmental harm

5.3. Resource Efficiency

Suppliers must strive to use resources efficiently, including water, raw materials, energy and packaging.

Suppliers with high water-use or water-impact operations (such as fresh water suppliers, laundry services, food and beverage suppliers, landscaping or irrigation vendors, wastewater treatment service providers, etc.) are expected to implement appropriate water stewardship measures. These may include monitoring water use, adopting water-efficient equipment or practices, and complying with applicable local water-use regulations.

5.4. Biodiversity & Land Conservation (including No Deforestation)

Suppliers shall not engage in activities that cause deforestation, land degradation or loss of biodiversity. Suppliers working near ecologically sensitive areas must prevent harm to natural ecosystems and comply with

relevant environmental regulations.

5.5. Extended Producer Responsibility (EPR)

Where applicable, suppliers providing packaging, electrical or electronic equipment, lighting, batteries, plastic materials or other regulated products are expected to comply with Extended Producer Responsibility (EPR) requirements under applicable laws and regulations. Suppliers shall ensure appropriate registration, reporting, take-back, recycling or disposal mechanisms as required under EPR frameworks.

Acceptance & Commitment

Suppliers must formally acknowledge this Supplier Code of Conduct and commit to implementing the principles contained herein.

This Code forms an integral part of supplier qualification, onboarding and continued engagement with MHRIL.

Review

This Code will be periodically reviewed and updated to reflect evolving standards, legal changes and MHRIL's sustainability commitments.

Manoj Bhat
Managing Director & CEO

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THANK YOU!

