

Supplier Code of Conduct

Apraava Energy is headquartered in Mumbai and is one of leading Independent Power Producer (IPP) in India. Founded in the year 2002, Apraava Energy has evolved from being a single-asset company to a forward-looking, climate-conscious organisation.

In pursuing our business objectives, we care how results are obtained, not just that they are obtained. Our Value Framework is a clear statement of our commitments to how we treat our people, our relationships with customers, investors, business partners, governments and the wider community, and how we manage the impact of our operations on the natural environment, underscoring the integral role of sustainability in our long-term development.

Our Suppliers are critical to us, as is our decision in the selection of the Suppliers that we do business with. We procure a wide range of products and services, of significant value, to maintain and develop our electricity supply business to meet our customers' needs. We strongly believe that with our Suppliers we can build value chains that at their core will support the Apraava Energy's environment, social and business objectives, in our vision, to partner in India's energy transition by being the most trusted, inclusive and integrated energy solutions provider.

The *Supplier Code of Conduct* (the *Code*) is derived from our values, policies, standards and objectives. It is Apraava Energy's general statement of the expectations of the Suppliers we are doing business with and those who want to do business with us

Throughout the *Code*, the use of the term Apraava Energy refers to the companies in which Apraava Energy holds a controlling interest.

How we will use the Supplier Code of Conduct

The *Code* comprises eleven (11) sustainability topics, representative of our responsible procurement practice. In each, we highlight the requirements our Suppliers must comply to and our expectations of what should be worked towards. We are committed to working alongside our Suppliers to reach our expected standards. If there is a gap between a Supplier's approach and the *Code*, we will encourage the Supplier to formulate and implement an enhancement plan.

We will reference the *Code* if an event or circumstance arises and Apraava Energy needs to make a judgement, or an assessment of a Supplier's business conduct.

We encourage our Suppliers to monitor, manage and disclose their performance with the *Code* and to extend similar principles into their upstream supply chains.

To support our efforts in managing our supply chains, we may request a Supplier to cooperate with us and provide evidence of accreditations, certifications, self-assessments, compliance review and audit reports relating to the subject matter of the *Code*.

Responsible Procurement Practices

Legal Compliance

Apraava Energy operates in different jurisdictions with the support of Suppliers throughout the global supply chain. Our activities are therefore subject to the laws of different jurisdictions, statutory requirements and statutory codes. Our reputation as a responsible energy provider is very much interlinked and built on compliance with the laws and regulations of the jurisdictions in which we operate and to include those of the countries where the transaction occurs.

Our Suppliers must:

- Comply with all the applicable laws, rules and regulations of the jurisdictions in which they do business.
- Ensure that the products are compliant with the applicable laws, rules and regulations of the jurisdictions in which they are exported to.
- Maintain all business licenses and permits in accordance with applicable laws, rules and regulations.
- Maintain procedures, processes and controls to keep updated with the applicable laws, rules and regulations.
- Inform Apraava Energy of any sanctions or other restrictions that it is subject to, and any risks arising out of conducting business with Apraava Energy

Business Ethics

In alignment with our Apraava Energy's *Value Framework*, we are committed to conducting all business with integrity, ensuring impartial business decisions without conflict of interest or undue influence, and safeguarding the business against bribery and unethical behaviours and practices.

Our Suppliers must:

- Do business in an honest, transparent, and professional manner; and be aligned with our Anti-Fraud Policy.
- Not provide any advantage in connection with a business transaction, including cash, gifts, loans, fees, rewards, commissions or entertainment and other benefits to Apraava Energy employees.
- Have a zero-tolerance policy to unethical business activities such as bribery and corruption, money laundering, fraud, extortion and embezzlement, collusion (including participation in cartels) conflict of interest, anti-competitive behaviour, insider trading, and infringement of intellectual property.
- Active reporting and managing of potential conflicts of interest.

Our expectations:

- Procedures, processes, internal training programs, and other controls to prevent, detect, and respond to unethical behaviour and practices.
- Accessible channels for employees and stakeholders to raise concerns and complaints in a confidential manner and without fear of retaliation.

Cyber Security

We recognise the rising risks of cyber threats and data privacy; and we are committed to taking actions to respect and protect our own data and the personal data of our customers.

Our Suppliers must:

- Accept they play a role in protecting Apraava Energy's digital assets.
- Comply with all relevant data privacy and information security laws and regulations.
- Have policies and processes in place to protect data privacy when any form of sensitive information is collected, stored, processed, transmitted, or shared.
- Take prior approval from Apraava Energy before sharing data with any sub-supplier.

Our expectations:

- Comply with Apraava Energy's data security requirements.
- Comply with Apraava Energy's cybersecurity requirements, including appropriate measures to identify and manage potential risk areas.
- Have data security incident detection and response protocols and a reporting mechanism to alert Apraava Energy of security incidents involving Apraava Energy's data.

Quality and Safety

We are committed to providing affordable and reliable energy, quality service and value to our customers. We have been able to deliver and achieve this with the support of our Suppliers.

Our Suppliers must:

Conduct business in accordance with all applicable safety laws and regulations of the jurisdiction in which they operate.

Our expectations:

- Products and services provided to Apraava Energy are of the highest standard of quality and safety, and delivered in a timely manner.
- Have product safety management systems and safety technologies in place and which evolve and improve over time.
- Collect information on product safety and quality is collected and use for continuous improvement.
- Integrity and transparency in managing quality and safety.
- Incident response protocols to provide alerts to Apraava Energy of incidents or breaches that may affect the health and wellbeing of Apraava Energy's customers and the reputation of Apraava Energy.
- Have a product recall or rectification programme in the event quality defects and safety issues are detected in supplied products.

Environmental Management

Reducing the impact our business has on the natural environment is a critical element of Apraava Energy's operating model. We are committed to minimising the environmental impact of our value chain while taking active approaches to protect and preserve the natural environment.

Our Suppliers must:

- Conduct their business in accordance with all applicable environmental laws and regulations of the jurisdictions in which they operate.

Our expectations:

- Identify and evaluate the environmental aspects and associated risk of business activities.
- Have an environmental management system when significant environmental aspects are identified.
- Adopt direct measures to prevent and mitigate the environmental impact of the resources used and waste generated.
- Continuously monitor environmental performance and regularly disclose the progress to Apraava Energy and wider stakeholders.
- Actively seek opportunities to protect and restore biodiversity and natural capital.

Climate Change

Climate change is one of the most critical challenges our world is facing. We are progressively decarbonising our portfolio of power generating assets and evolving our business model to support our customers to improve energy efficiency. We are also seeking to reduce our Scope 3 greenhouse gas emissions and emissions from our upstream supply chains. As we transition to a low carbon economy, we are conscious that the associated social impacts are minimised.

Our expectations:

- Support us to achieve our *Climate Vision 2050* commitments.
- Measure and disclose greenhouse gas (GHG) emissions.
- Have a decarbonisation strategy with emissions reduction targets.
- Reduce energy consumption and transition to clean energy sources.
- Conduct an impact assessment of their business on climate-related risks and the integration of climate action into their core business strategy.
- Action to adapt to the physical risk of climate change to ensure resilience.
- Explore opportunities from climate change in the transition to a low-carbon economy

Employee Health and Safety

Safeguarding the health, safety, and wellbeing of our employees is an Apraava Energy core value. We will provide guidance and support to our Suppliers to create a healthy and safe workplace for their employees.

Our Suppliers must:

- Conduct business in accordance with all applicable health and safety laws and regulations of the jurisdiction in which they operate.

Our expectations:

- A demonstrable commitment to health and safety that may include:
 - Incorporate Health and Safety considerations in all business decisions which has a direct bearing on - Apraava Energy Health and Safety interests
 - Encourage communication, collaboration, and consultation with all stakeholders

- Identify significant workplace hazards and risks and implement prevention and mitigation measures.
- Develop employee competencies to ensure work is done safely where personnel are engaged in activities that may pose a hazard to their safety or the safety of others e.g. manufacturing, working at heights, hazardous chemicals.
- Provide appropriate levels of competent supervision to ensure work is done safely.
- Continuous monitoring of health and safety performance and a regular disclosure of the progress to Apraava Energy and wider stakeholders.
- Have protocols to respond to safety emergencies and incidents that mitigate impacts.
- Retain evidence of learning from incidents and making improvements.

Labour Practices and Human Rights

At Apraava Energy we respect all internationally recognised human rights relevant to our operations and recognise the value of our employees, their families and the communities we operate in. As a responsible business we are committed to cascading this value to our operations and our Suppliers to provide a dignified, fair and equal workplace.

Our Suppliers must:

- Conduct business in accordance with all applicable labour and human rights laws and regulations of the jurisdictions in which they operate.
- Have zero tolerance in respect of any child labour and use of forced or compulsory labour at any point in their operations and upstream supply chains.
- Not employ any individual below the local legal minimum employment age.

Our expectations:

- Ensuring that regular (i.e., normal contractual hours excluding overtime and meal breaks) and maximum working hours comply with requirements under relevant local legislation and applicable industrial instruments.
- Pay a living wage or legally established minimum wage, with a similar obligation on Suppliers in the upstream supply chain.
- Respect and uphold the fundamental principles of human rights and responsible labour practices
- Respect the right of workers to have freedom of association and collective bargaining powers, allow employees to form or join professional unions and other organisations and professional bodies of their choice.
- Have a confidential whistleblowing mechanism with appropriate procedures to investigate and address reported concerns and violations, with such mechanism including safeguards against retaliation.
- Provide access to a remedy for the Supplier's workers and those employed in their supply chains if they are exposed to a harm or violation of their human rights.

Diversity and Inclusion

Apraava Energy operates in multiple jurisdictions with a workforce and customer base from a variety of different cultures and backgrounds. We are committed to providing an inclusive and diverse workplace allowing us to serve our diverse portfolio of customers.

Our Suppliers must:

- Conduct business in accordance with all applicable laws and regulations governing diversity and inclusion in the jurisdiction in which they operate.
- Have zero tolerance of any form of discrimination and harassment

Our expectations:

- Implement programmes to foster employee's health and well-being, including flexible working hours or work sharing, work from home arrangements, a family friendly workplace and paid parental leave.
- Establish non-discriminatory mechanisms and processes in recruitment, remuneration, and performance evaluation of employees.
- Setting ambitious target for women representation in operational, professional and leadership roles.

Community Relations

Our operations have a direct and indirect impact on the local communities in which we operate. Through open communication and engagement with local communities we strive to create a positive impact and to minimise our operational impact.

Our expectations:

- Establish a process to identify and mitigate risks imposed by products and operational activities on local communities.
- Have an open communication channel for community members to raise concerns and grievances.
- Actively support the communities in which business is conducted.
 - Conduct outreach activities to improve community well-being, competency, and resilience.
 - Adopt initiatives that serve the needs of socio-economically disadvantaged communities.
 - Provide support to small and medium, local and indigenous businesses and entrepreneurs to contribute to economic development and wealth.

Supply Chain Management

As we cascade our commitments and expectations in doing business responsibly to our Suppliers, we encourage our Suppliers to do the same with their upstream Suppliers.

Our expectations:

- Monitor and measure performance of upstream Suppliers in accordance with the expectations set out in this *Code*.
- Be Transparent in providing to fair and ethical treatment to upstream Suppliers.
- Adopt robust programs for the management of upstream Suppliers including:
 - A Supplier's own code of conduct which incorporates values aligned with this *Code*.
 - Elements of responsible procurement, such as Supplier selection including sustainability criteria and risk ranking, Supplier sustainability audit and capacity building programs.
- Actively educate procurement teams on the sustainability-related risks.
- Engage regularly with upstream Suppliers to enhance competency to manage risks.

Communication

An open communication channel with our Suppliers is essential to us.

We encourage Suppliers to contact us through their Apraava Energy's procurement representatives or contract responsible officers about inquiries, suggestions, or concerns.