

Anti-Bribery and Corruption Policy

August 2026

I. INTRODUCTION

This Anti-Bribery and Corruption Policy (“the Policy”) applies to all directors, officers, employees, vendors, temporary workers¹ and business partners including Tenants of Brookfield India Real Estate Trust, manager of Brookfield India Real Estate Trust and all entities owned and controlled by Brookfield India Real Estate Trust; (“BIRET”², “we”, “us”, “our” or the “company”).

We are committed to operating with the highest ethical standards and this includes preventing bribery in our business activities. This Policy sets forth key principles and standards, as well as key supporting policies and procedures, with respect to addressing bribery risks in our business, which should guide your conduct.

This Policy should be read in conjunction with Code of Business Conduct and Ethics (“the Code”), which serves as a guide for how you should conduct yourself as a member of the BIRET team and/or its vendor / consultant / off roll employee / contract / third parties

II. ZERO TOLERANCE APPROACH TO BRIBERY

Do not give or receive bribes, including “facilitation payments”.

We do not pay bribes in furtherance of our business and expect that you will not do so on our behalf. We have a zero-tolerance approach towards bribery. This commitment comes from the highest levels of management and you must meet this standard.

A bribe is anything of value that is offered, promised, given, or received to improperly influence a decision or to gain an improper or unfair advantage in promoting, enhancing, obtaining, or retaining business. Bribery may not always be in the form of cash payments and may take many other forms, including:

Gifts, travel, entertainment, and hospitality;

- Political contributions, Charitable donations or sponsorship;
- Employment opportunities, directorships, internships, or Secondments;
- Procurements and service contracts;
- Phony jobs, internships created for particular people, or “consulting” relationships;
- Excessive discounts or rebates; or
- Non-arm’s length loans, forgiveness of debt or other transactions.

¹ For purposes of the Policy, “temporary workers” include non-full-time employees and consultants and contractors etc. that work on our premises.

² BIRET include the following Brookprop Management Services Private Limited, MountainStar India Office Parks Private Limited, Candor India Office Parks Private Limited, Candor Gurgaon One Realty Projects Private Limited, Candor Kolkata One Hi-Tech Structures Private Limited, Shantiniketan Properties Private Limited, Seaview Developers Private Limited, Festus Properties Private Limited, Kairos Properties Private Limited, Rostrum Realty Private Limited, Aspen Buildtech Private Limited, Oak Infrastructure Developers Private Limited, Arnon Builders & Developers Private Limited, Arliga Ecoworld Business Parks Private Limited, collectively and any other new acquisitions/ addition of BIRET in India

Facilitation payments are also a form of bribe and are, therefore, not permitted. Facilitation payments are small payments made to secure or speed up routine actions or otherwise induce public officials or other third parties to perform routine functions they are otherwise obligated to perform, such as issuing permits, approving immigration documents or releasing goods held in customs. This does not include official, legally permitted statutory or administrative fees formally imposed and codified by government agencies for expedited service.

The Company has a corresponding Anti-Bribery and Corruption Program that outlines the specific actions we take to prevent and detect bribery in our business. This policy must be read alongside the Anti-Bribery and Corruption Program to understand all requirements applicable to you to ensure compliance with relevant laws and this Policy.

III. DEALING WITH PUBLIC OFFICIALS

Interactions with public officials require enhanced scrutiny and sensitivity.

A public official is any person who is employed by or is acting in an official capacity for a government, a department, agency or instrumentality of a government or a public international organization, or any other persons so defined in the applicable laws of the jurisdiction in which we operate. This is a broadly defined term and includes elected or appointed persons who hold legislative, administrative or judicial positions such as politicians, bureaucrats, civil servants and judges. It also includes candidates for political office, political party officials and persons who perform public functions such as professionals working for public pension plans, public health agencies, water authorities, planning officials and agents' public international organizations, such as the UN or World Bank. A "public official" may also include employees of government-owned or controlled businesses, including sovereign wealth funds and state-owned utility companies. For example, if a government has an interest in a utility and exercises control over the activities of that utility, then the utility's officials are likely to be considered "public officials". Third parties acting at the direction of these individuals and entities should also be considered public officials.

There is increased sensitivity and scrutiny of dealings with public officials because this has traditionally been an area where bribery activity is more likely to occur. Be cognizant of these risks in your dealings and interactions with public officials and consider how your actions may be viewed. For example, providing payments, gifts or employment to close relatives of public officials have been treated by enforcement authorities as direct payments to the public officials and, therefore, may constitute violations of law.

Hiring public officials or persons referred by public officials requires enhanced scrutiny.

Hiring public officials or applicants related to, or referred by, public officials could be seen as a bribe in certain situations and should be subject to enhanced review to ensure that the related risks are appropriately mitigated. Consult your Human Resources (HR) team for procedures related to identifying and mitigating these risks.

In practice, situations can be complex and this Policy does not cover every circumstance that you may encounter. When in doubt, please contact the company's Regulatory and Compliance / Legal team for assistance.

IV. THIRD PARTIES

Third Parties are not permitted to pay bribes on our behalf.

The company may be scrutinized and/or prosecuted for failing to detect and prevent bribery by a person associated with it. This includes any individual or entity that performs services for or on behalf of the company. Employees should avoid doing business with third parties who do not have a zero-tolerance approach to bribery.

This means due diligence should be undertaken on contractors, joint venture partners, agents and other third parties to establish their anti-bribery credentials, where warranted by the assessed level of risk. This due diligence generally includes, at a minimum, adverse media screening. It could also include, for high risk third parties, meeting with them to better assess their business practices and anti-bribery and corruption policies/controls, and making commercially reasonable inquiries into their reputation and past conduct. Other risk mitigation strategies, such as including anti-bribery language in agreements, should also be implemented, as appropriate.

Refer to the company's Third-Party Due Diligence Procedures for further details.

V. GIFTS, MEALS AND ENTERTAINMENT

The giving or receiving of gifts, meals and entertainment should be proportionate and reasonable for the circumstances, for legitimate purposes only, and not with a view to improperly inducing a third-party to misuse their position or as a quid pro quo for official action or with linkage to an official decision.

Gifts (e.g. merchandise, event tickets) given to or received from persons who have a business relationship with the company are generally acceptable if the gift is reasonable in value, infrequent, appropriate to the business relationship, and does not create an appearance of impropriety. No cash payments (including cash equivalents, like gift cards, digital transfer, wallet transfer) should be given or received unless the Company has documented circumstances in which this would be appropriate (e.g., low value gift card provided as part of a customer service-related remedy).

Meals and other entertainment (e.g. sporting events or the theatre, concerts, rounds of golf) given to or received from persons who have a business relationship with the company are generally acceptable, but again only if the meal or entertainment is reasonable in value, appropriate to the business relationship, infrequent, does not create an appearance of impropriety, is otherwise in accordance with applicable laws and regulations, and if a representative from the sponsoring organization (the party paying for the meal or entertainment) is present at the event. For the avoidance of doubt if a representative from the sponsoring Organization is NOT present at the event, the meal or entertainment would be considered a gift. Also be aware that many jurisdictions have laws restricting meals and entertainment given to public officials or their close relatives that must be followed.

Gifts, meals, and entertainment that are repetitive, no matter how small, may be perceived to be an attempt to create an obligation to the giver and should not be provided. Gifts or entertainment given close in time to when a decision impacting our business is being made (including by a private business partner) may be perceived as a bribe in return for a favorable decision and should also not be provided. Employees should not personally pay for gifts, meals, or entertainment to avoid having to report or seek approval.

Travel and related items given or received should follow the same principles as for gifts. Under no circumstances should cash or per diem reimbursements be provided.

In addition, gifts and entertainment should not be given to or received from public officials except (i) branded promotional gifts of nominal value (e.g., pens, mugs, notepads, water bottles, caps, t-shirts), (ii) modestly priced gifts (e.g. holiday fruit baskets or boxes of chocolate) in connection with holidays or personal events (e.g., birthdays or weddings), and (iii) entertainment in accordance this Policy and the guidelines in this section. For all gifts and entertainment provided by the company to public officials pursuant to (ii) and (iii), authorization from Regulatory and Compliance / Legal team is required to ensure compliance with applicable law and this Policy, and a log of such authorizations should be maintained. The log should include the identity of recipients/participants, a description and value of the gift(s), and for entertainment, the location and business purpose. Where possible, holiday gifts for public officials should be provided to the applicable government entity for distribution to individuals, rather than to individuals themselves.

To help ensure that our practices are reasonable, appropriate, and otherwise in accordance with applicable regulatory requirements, certain gifts, meals and entertainment must be logged and/or pre-approved. Refer to the company's policies covering Gifts, Entertainment, Political contributions, Charitable contributions, etc. for additional details.

If you are in doubt as to whether proposed gifts, meals or entertainment to be given or received are appropriate, please consult the company's Regulatory and Compliance / Legal team for assistance.

VI. CHARITABLE DONATIONS

Do not solicit or offer donations to clients, suppliers, vendors, public officials or others in a manner which communicates that a donation is a prerequisite for future business or that the offer of a donation is intended to obtain or retain business and a business advantage.

Unless approved, you are prohibited from using the company's name, resources or business contacts for solicitation of donations. Charitable donations made by individuals on their own behalf should have no relationship to company business and must comply with local laws and regulations.

Requests for donations may take many forms (e.g. direct requests or indirect requests such as purchasing a table, a round of golf or otherwise contributing to an event designated to raise money for a particular charitable cause/organization). All requests for corporate donations to charities and other not-for-profit organizations (e.g. schools, hospitals, libraries, etc.) must be approved in advance by the person(s) designated to approve such donations. If you are requested by a public official to make a donation to a particular charity, please obtain approval before agreeing to or making the donation. You should also conduct due diligence when the proposed charity or not-for-profit organization is not well-known or there may be question as to the legitimacy of the organization as a charity or not-for-profit.

Please refer to the company's policies covering gifts, entertainment, political contributions, charitable contributions, etc. for further details.

VII. POLITICAL CONTRIBUTIONS LOBBYING, AND MUNICIPAL IMPROVEMENTS (NOT APPLICABLE TO VENDORS/CONSULTANTS)

Do not offer or make contributions to political parties, officials and/ or candidates that might influence, or be perceived as influencing, a business decision.

To ensure that we do not violate laws and regulations regarding political contributions in any country, all political contributions no matter how small or insignificant, made on behalf of the company (directly or indirectly) or otherwise relating to its business, must comply with the applicable regional Political Contribution Policy. Political contributions should not be made on behalf of the company in countries in which we do not have a presence. Consult the applicable political contribution policy and get prior written approval from the Regulatory and Compliance / Legal team before making any political contributions on behalf of the company.

Political donations made by individuals on their own behalf and unrelated to the company's business must comply with local laws and regulations. Consult the applicable political contribution policy before making any personal political contributions.

All municipal improvements should be approved by the Regulatory and Compliance / Legal team and documented transparently.

If you are in doubt as to whether a proposed political contribution is appropriate, please consult the company's Regulatory and Compliance / Legal team for assistance.

Do not engage in any lobbying activities on behalf of the company without specific authorization.

Lobbying activities generally include attempts to influence the passage or defeat of legislation and may trigger registration and reporting requirements. In many jurisdictions, the definition of lobbying activity is extended to cover efforts to induce rule making by executive branch agencies or other official actions of agencies, including the decision to enter into a contract or other arrangement.

You may not engage in lobbying activities on behalf of the company without the prior written approval of the company's Regulatory and Compliance / Legal team.

Ensure that municipal improvements are transparent and intended for the betterment of the community at large – not for any individual public official.

The Company may be asked to provide enhancements to the communities in which we operate. Often, this is a good way to establish or maintain goodwill. You should always consult with the Company's Regulatory and Compliance / Legal team prior to agreeing to or offering any municipal improvements, and if agreed, the terms should be clearly documented. It is important to avoid the perception or later interpretation that the municipal improvement is given as a quid pro quo.

RECORD-KEEPING

Record all our transactions in a complete, accurate and detailed manner so that the purpose and amount of the transaction is clear.

In addition to prohibiting bribery, anti-bribery legislation and other laws expressly require accurate and complete record-keeping and the establishment and maintenance of an adequate system of internal controls. One purpose of these provisions is to prevent companies from concealing bribes and to discourage fraudulent accounting practices.

All transactions should be recorded completely, accurately and with sufficient detail so that the purpose and amount of any such payment is clear. No undisclosed or unrecorded funds or assets of the company should be established for any purpose. False, misleading, or artificial entries should never be made in the books and records of the company for any reason.

REPORTS AND COMPLAINTS

Internal reporting is critical to the company's success, and it is both expected and valued. You are required to be proactive and promptly report any suspected violations of this Policy, or any illegal or unethical behavior of which you become aware, including but not limited to, any situations where a public official or other party requests or appears to request an inappropriate benefit³. The confidentiality of reported violations will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and subject to applicable law. No retribution or retaliation will be taken against any person who has filed a report based on the reasonable good faith belief that a violation of the policy has occurred or may occur in the future.

Employee may report actual or potential misconduct or violations of the policy to their supervisor in the first instance, since their supervisor is generally in the best position to resolve the issue. Alternatively, you may contact the HR Department or company's Regulatory and Compliance / Legal team to report any actual or potential misconduct or policy violations, or if you have any specific or general questions. In the event you do not want to report violations to your supervisor, HR Department or the Regulatory and Compliance / Legal team, you can always make a report through the company's reporting hotline. See the Code for our reporting hotline information, which is managed by a third-party and allows for anonymous reporting of suspected violations.

³ Document and report to supervisors and/or internal counsel any situations where a public official request—or appears to request—a personal or other inappropriate benefit; for instance, when a public official suggests to:

- Retain a specific vendor
- Offer a job to a friend or relative
- Make a specific charitable contribution
- Provide meals, gifts or entertainment
- Make a payment to expedite required approvals or permits
- Or when you encounter other suspicious behavior, especially when a public official or agency has a questionable reputation

DISCIPLINARY ACTION FOR POLICY VIOLATIONS

Please note that we reserve the right to take disciplinary action for policy violations that fit the nature and particular facts of the violation. This could, in the most severe circumstances, include immediate termination for cause and, if warranted, legal proceedings may be brought against you.

KEY CONTACTS

If you have any questions on this Policy, please contact:

MD and CEO:

Shashank Jain

Telephone: 022-45832450

EVP – Regulatory Affairs & Compliance:

Sanjay Yadav

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