



Supplier Code of Conduct

PropertyGuru Group Limited

(As of June 19, 2024)

1 Introduction

- 1.1 PropertyGuru Group Limited and its subsidiaries (together, “**PropertyGuru**” or the “**Company**”) maintain the highest ethical standards in their business activities and expect the same from their Suppliers¹. Acting ethically requires, but is not limited to, complying with all applicable laws and regulations and conducting business with respect for principles of basic human rights and decency when interacting with both colleagues and external parties.
- 1.2 This PropertyGuru Supplier Code of Conduct (“**Code**”) sets forth the minimum standards of conduct for Suppliers performing work for or on behalf of PropertyGuru. PropertyGuru expects all Suppliers to read, understand and comply with these standards and to ensure that any authorized sub-contractors also comply with the minimum standards set forth in this Code.
- 1.3 This Code is effective as of June 19, 2024.

2 Compliance with the Code

- 2.1 This Code is underpinned by core principles of respect, integrity, transparency, confidentiality, privacy, sustainability, diversity and inclusion, and accountability – discussed further below – and PropertyGuru’s commitment to upholding these principles in the way it conducts its business and, importantly, how it expects its Suppliers to act in their business dealings with or on behalf of PropertyGuru.
- 2.2 When assessing and appointing Suppliers, PropertyGuru will consider the ability of Suppliers to adhere to this Code irrespective of whether or not it is formally incorporated into a Supplier’s contract. Where PropertyGuru’s contract with a Supplier sets out more specific requirements, this Code shall supplement those provisions.
- 2.3 Failure to adhere to the standards of this Code may reflect negatively on a Supplier’s relationship with PropertyGuru and will be considered in future business determinations. For further information, questions or concerns about this Code, please contact legal@propertyguru.com.

3 Respect

- 3.1 **Employment practices:** Suppliers must comply with all applicable employment laws, regulations, and standards in relation to labour practices, human rights and work-place health and safety. Suppliers are expected to pay fair wages, observe reasonable and safe working hours, provide a safe and healthy working environment and offer all other benefits required by law. All work should be voluntary, and employment obligations under country and industry laws and regulations should be strictly adhered to.
- 3.2 **Fair Treatment:** Suppliers must treat all employees and contractors fairly, operating with dignity, respect, and integrity. Suppliers must not discriminate, harass, intimidate, threaten, humiliate, or abuse their employees and contractors and are expected to have in place a robust and effective grievance handling framework. Retaliation against employees and contractors is strictly prohibited.
- 3.3 **Child and Forced Labour:** Suppliers must not use, employ, or seek to exploit in any way the services of child, under-aged, slave or trafficked labour. This includes any form of indentured servitude, such as use of physical punishment, confinement, and/or threats of violence as a method of discipline. In addition, Suppliers should not forcibly retain employees’ identification, passports, work permits, or deposits as a condition of employment. Suppliers must require the same from any contractor or subcontractor employed to perform work for PropertyGuru.

¹ Suppliers means any party, including contractors, consultants and authorised sub-contractors who supply goods or services to PropertyGuru or to another party for or on behalf of PropertyGuru.

4 Integrity

- 4.1 **Anti-bribery and Corruption:** Suppliers are required to comply with PropertyGuru's [Anti-Corruption Compliance Policy](#) and to behave ethically in all business dealings with and for PropertyGuru. PropertyGuru takes a zero-tolerance approach to any form of bribery or corruption. Suppliers are expected to comply with applicable anti-bribery and anti-corruption laws and to have in place adequate policies and procedures to monitor compliance with such laws. Suppliers should not make payments to government entities or employees to expedite the timing of activities that the government entity or employee is required to perform except if it is an official express service offered by the relevant government entity.
- 4.2 **Supply Chain:** Suppliers must carefully select and monitor third parties they use who will act for PropertyGuru (whether directly or indirectly) and conduct appropriate diligence and background checks, considering the activity, origin, and level of government interaction of the third party. Third parties, contractors, agents, or subcontractors should be selected based on merit and competitiveness. Suppliers are responsible for ensuring their own third parties comply with this Code and applicable standards and policies with respect to business conducted for PropertyGuru.
- 4.3 **Competition:** Suppliers are expected to comply, at a minimum, with the competition laws in the countries where they operate or sell products and/or services. They must not coordinate market conduct with competitors or their own suppliers in a way that is anti-competitive or otherwise improperly restricts competition. Suppliers also must not discuss internal or material non-public business information, such as prices, discounts, pricing policy, profits, market share, production levels, customers, or sales territories with any of PropertyGuru's competitors, particularly concerning work performed for PropertyGuru.

5 Transparency

- 5.1 **Conflicts of Interest:** Suppliers must avoid any activity that creates a conflict of interest or the appearance of a conflict of interest that brings into question their objectivity. This includes conflicts of interest that may result from financial interests, employment, time commitments, outside directorships, stock ownership, friends/familial relationships, sponsorships or honorariums, and use of confidential information. Each Supplier acknowledges that it will not use its position to profit personally at the expense of PropertyGuru.
- 5.2 **Books and Records:** Suppliers are required to maintain accurate and transparent books and records at all times and demonstrate compliance with applicable laws and regulations. Suppliers must be watchful for and report internally any irregular payments, suspicious transactions, or suspected money laundering within a reasonable timeframe.
- 5.3 **Audits and Assessments:** Suppliers are expected to cooperate with PropertyGuru's internal and external investigators and auditors, and must notify PropertyGuru, if legally permitted, of any investigation, audit, assessment, or unusual request that relates to PropertyGuru or concerns the work the Supplier is performing for or on behalf of PropertyGuru. In addition, PropertyGuru and its appointed external representatives shall have the right to inspect and audit the books, records and accounts of the Supplier, as well as conduct operational audits, if requested.

6 Confidentiality and Data Protection

Suppliers must:

- (a) safeguard PropertyGuru confidential information and the personal data of PropertyGuru employees, consultants and other persons whose personal data they come into possession of in the course of their work for PropertyGuru;
- (b) adopt appropriate internal policies and procedures to comply with relevant data protection, privacy, and information security laws and regulations;

- (c) only acquire and seek to acquire confidential information or personal data through proper means, and keep such information secure and accessible only to those with a legitimate need to access it;
- (d) not seek to obtain or use insider material or confidential information that belongs to PropertyGuru, competitors or other third parties;
- (e) not discuss, disclose, transfer, release, or share any confidential information or personal data concerning PropertyGuru or anyone else without the written consent of PropertyGuru; and
- (f) immediately notify PropertyGuru in writing of any data breach involving confidential information or personal data of, or disclosed by, PropertyGuru, its clients or customers.

7 Sustainability

PropertyGuru is committed to preserving the environment, promoting environmental sustainability and complying with all applicable environmental laws and regulations. Suppliers are expected to comply, at a minimum, with all applicable environmental laws, regulations and international treaties. They are expected to minimise adverse environmental impacts of their operations, products and services, and work proactively to reduce carbon emissions, reduce water consumption, and minimize waste generation.

8 Diversity and Inclusion

PropertyGuru requires its Suppliers to share its principles relating to diversity and inclusion (“D&I”). We expect Suppliers to commit to and implement business practices with full respect for the following D&I principles:

- (a) creating products and services that represent and respect the diversity of PropertyGuru’s consumer and customer base;
- (b) developing products and services accessible to all, including individuals with disabilities; and
- (c) actively seeking to partner with diverse suppliers, promoting economic inclusion within their supply chain.

9 Accountability

- 9.1 PropertyGuru can only fulfil its commitment to conducting its business with the highest ethical standards if Suppliers share this commitment. PropertyGuru therefore expects all Suppliers to be alert to potential violations of law or this Code in the context of their relationship with PropertyGuru and to notify PropertyGuru of any concerns. Suppliers who represent PropertyGuru or are effectively working as PropertyGuru personnel must, if legally permitted to do so, immediately notify PropertyGuru’s Legal team at legal@propertyguru.com if they are notified by a regulatory authority or other external party of an audit, investigation, lawsuit, or other inquiry regarding PropertyGuru.
- 9.2 PropertyGuru requires its Suppliers to cooperate with it in the resolution of any concern, including making relevant documents, information, employees and consultants available when requested and appropriate and by maintaining the confidentiality of any information related to such a request. PropertyGuru strictly prohibits retaliation of any kind against anyone who reports a concern in good faith and requires the same of its Suppliers.

10 Violations

- 10.1 Suppliers must report all known, suspected or potential breaches of this Code immediately, to their PropertyGuru contact and PropertyGuru’s legal team at legal@propertyguru.com, with remediation (if possible) occurring on a timely basis.

- 10.2 PropertyGuru does not tolerate retaliation against personnel for escalating questions or concerns. For further information, please refer to PropertyGuru's [Whistleblower Protection Policy](#), which sets out how to submit confidential and anonymous concerns and complaints.
- 10.3 Where a breach of this Code is established, PropertyGuru reserves the right to terminate its business relationship with the applicable Supplier and to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of any law.

11 Where to go for help

Please reach out to PropertyGuru's Legal Team at legal@propertyguru.com with any questions regarding this Code.

12 Related Documents

- (a) PropertyGuru Group [Anti-Corruption Compliance Policy](#);
- (b) PropertyGuru Group [Code of Business Conduct and Ethics](#); and
- (c) PropertyGuru Group [Whistleblower Protection Policy](#).

Version History

Title	Supplier Code of Conduct
Version	1.0
Reviewed	June 2024
Document Sponsor	Chief Financial Officer
File Name	PropertyGuru Supplier Code of Conduct v1.0
Next Review	June 2025