

	MY HOME CONSTRUCTIONS PVT. LTD.	
	Conflict of Interest Policy	Ref No: MHCPL-VIGL-001
		Version: 01-25
		Date: 01.10.2025

A conflict of interest arises whenever an employee, contractor, consultant, vendor, supplier, or other associated person has personal, professional, financial, or other interests that may compromise or appear to compromise their ability to make sound, impartial, and objective business decisions on behalf of My Home Constructions Private Limited (MHCPL).

A conflict may be:

- **Direct** – when the employee personally has a conflicting interest.
- **Indirect** – when it involves immediate or close family members, relatives, or associates.
- **Perceived** – when third parties could reasonably believe that personal interests might improperly influence professional judgment.

MHCPL is committed to ensuring that all decisions are taken in the best interests of the Company, free from bias or undue influence.

1. Types of Conflict of Interest

A conflict of interest may arise in different forms. For the purpose of this policy, conflicts will include the following:

- **Actual Conflict of Interest:** A real conflict between an employee's duties and their personal interests.
- **Potential Conflict of Interest:** A situation where personal interests may give rise to a conflict in the future.
- **Perceived Conflict of Interest:** A situation where stakeholders or the public could reasonably believe that personal interests might influence decisions, even if not actually the case.

Special Provision: In cases where contractors, suppliers, or business partners falls under above category such interests must be **fully declared** in the Conflict of Interest Declaration. The **management reserves the right to review/approve** such disclosures and determine:

- Whether the engagement can be permitted.
- The **specific scope of work** such parties may be restricted to.
- Clear **restrictions on access to confidential information, influence over decision-making, or involvement in procurement/contract approvals.**

This ensures transparency while preventing favouritism, misuse of position, or undue advantage.

2. Purpose

This policy provides clear guidance to employees, contractors, vendors, and other stakeholders on identifying, disclosing, and managing conflicts of interest. Its purpose is to:

- Ensure transparency and ethical conduct in all dealings.
- Prevent legal liabilities, reputational risks, and organisational disharmony.
- Safeguard the decision-making process from undue influence.


 Head V&S


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3. Scope and Applicability

This policy is in continuation of Vigilance Policy Addendum June 2024 and applies to:

- All employees (permanent, temporary, probationary, or contractual).
- Contractors, consultants, vendors, and suppliers associated with MHCPL.
- Trainees, interns, or other associated personnel.

The policy extends across all projects, subsidiaries, group companies, and joint ventures of MHCPL.

4. Activities Constituting Conflict of Interest

Examples include, but are not limited to:

- Hiring, promoting, or extending preferential treatment to family members or close associates.
- Using Company information, finances, or resources for personal gain.
- Accepting high-value gifts, entertainment, hospitality, or donations from clients, vendors, or contractors.
- Conducting business with entities in which the employee or their relatives hold financial/commercial interests.
- Engaging in outside employment, consultancy, or business activity that interferes with MHCPL responsibilities.
- Ownership or investment in competitors, suppliers, or contractors without disclosure and approval.
- Contributions or donations that may be intended to influence Company decisions.
- Misuse of position, authority, or Company information for personal advantage.

5. Guiding Principles

- Respect and protect MHCPL's interests by avoiding actual, potential, or perceived conflicts.
- Be transparent and proactive in declaring conflicts of interest.
- Employees must not use Company platforms, projects, or positions for personal gain or to benefit family/friends.
- Prior written clearance from EVC is mandatory before engaging in any activity that could constitute a conflict.
- Employees must act in compliance with applicable laws, the Company's Code of Conduct, and this policy.

6. Management of Conflict of Interest

- All actual, potential, or perceived conflicts must be promptly reported to the **Head Vigilance** in the prescribed disclosure format.
- Head Vigilance will assess, document, and investigate the disclosure, collecting relevant information.
- If no conflict exists, the disclosure will be recorded and closed.
- If a conflict exists, Head Vigilance will recommend corrective measures, which may include recusal from decision-making, transfer of responsibilities, or other actions and send it to formal approval of Executive Vice Chairman.


Head V&S
EVC

- Serious breaches will be escalated to the **Executive Vice Chairman (EVC)** and, if necessary, through the Whistle blower mechanism for formal investigation.
- Employees, contractors, and vendors must fully cooperate in the resolution process.

7. Documentation

- A **Conflict of Interest Register** (manual/digital) will be maintained by the Vigilance Department to record all disclosures, investigations, and resolutions.
- The register will remain confidential and accessible only on a need-to-know basis.
- Annual reviews will be conducted to monitor recurring or systemic risks.

8. Review

- The **Head Vigilance** shall periodically, and at least annually, review all declared conflicts and assess adequacy of controls.
- Adequate responses will be communicated to the disclosing employee within **30 days** of declaration.
- The Vigilance Department will report material disclosures to the EVC and ensure compliance with applicable legal obligations.

9. Reporting of Violations

- Any violation of this policy must be reported through the **Whistle blower Mechanism**.
- Reports will be handled with confidentiality and fairness.
- Violations may result in disciplinary action, including suspension, termination, blacklisting, or legal proceedings, depending on severity.

10. Amendment

MHCPL reserves the right to amend or modify this policy from time to time to reflect evolving business needs, regulatory requirements, and best practices.

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Head V&S

EVC

My Home Constructions Private Limited
(Conflict of Interest Disclosure Form)

1. General Information:

Full Name :	
Designation / Role / Nature of Association with MHCPL	(Employee / Vendor / Contractor / Consultant / Others)
Employee ID/Vendor Code/Contract Reg No.	
Company / Firm Name (if applicable)	
Department / Project / Site Name	
Contact Number / Email ID	

2. Conflict of Interest Declaration

A *Conflict of Interest* arises when personal, financial, or family relationships could influence, or appear to influence, fair and objective decision-making or actions related to MHCPL's business.

Please review the below situations carefully and tick (✓ Yes / No) as applicable.
If "Yes", provide a brief description in the space given.

Possible Conflict Area	Yes / No	If Yes, please provide brief details (names, relation, company, project, etc.)
1. I, my company, or my family member have any direct or indirect financial interest (ownership, shareholding, partnership, etc.) in any vendor, contractor, or service provider associated with MHCPL.	☐ Yes ☐ No	
2. I, my company, or my family member are presently engaged in business with MHCPL where a personal or family relationship exists with any MHCPL employee, official, or management member.	☐ Yes ☐ No	
3. I, my company, or my family member are involved in decision-making, approval, or recommendation processes that could benefit an associated person or entity related to me/us.	☐ Yes ☐ No	
4. I or my company are working, consulting, or supplying materials/services to other real estate, infrastructure, or contracting firms that may compete or conflict with MHCPL's interests.	☐ Yes ☐ No	
5. I, my company, or my family member have accepted or been offered any gift, hospitality, cash, or benefit from any party related to MHCPL business beyond nominal or customary value.	☐ Yes ☐ No	
6. I am aware of any other situation, relationship, or activity that may appear as a conflict of interest or affect impartiality in dealings with MHCPL.	☐ Yes ☐ No	

3. Declaration

I hereby declare that the information provided above is true and complete to the best of my knowledge. I understand that this declaration is a preventive measure to promote transparency and protect the interests of both *My Home Constructions Private Limited* and its stakeholders.

I also undertake to immediately inform MHCPL if any change occurs in the information declared above that may create a potential or actual conflict of interest.

I understand that failure to disclose conflicts of interest may result in disciplinary action, including termination of employment/contract or legal proceedings, as applicable.

Signature: _____

Name: _____

Date: _____

4. For Office Use (Head Vigilance / Vigilance Department)

- Date of Receipt: _____
- Register Entry No.: _____
- Review Outcome:
 - ☐ No Conflict Found
 - ☐ Conflict Found – Mitigation Plan Implemented
 - ☐ Escalated to Executive Vice Chairman (EVC)
- Restrictions/Conditions Imposed: _____

Reviewed By: _____

(Head Vigilance)

Date: _____

APPROVED BY

EXECUTIVE VICE PRESIDENT

Date: _____