



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.



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.



- 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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