

HERITAGE MAX REALTECH PRIVATE LIMITED



GOVERNANCE POLICY

ABSTRACT

Heritage Max Realtech Private Limited is committed to upholding ethical standards and promoting sustainability across its operations. Through policies addressing Bribery and Corruption, Cybersecurity, Data Protection and Privacy, Fiduciary Duty, Fraud Prevention, and Shareholder Rights, we ensure transparency, accountability, and responsible business conduct. These policies outline our commitment to integrity, protection of stakeholder interests, and adherence to legal and ethical standards, driving our mission towards sustainable development.

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BRIBERY AND CORRUPTION POLICY

INTRODUCTION:

Heritage Max Realtech Private Limited recognizes that bribery and corruption pose significant risks to our business integrity, reputation, and sustainability. We are committed to conducting our operations with the highest standards of ethics, transparency, and accountability, and to preventing bribery and corruption in all aspects of our development projects. This policy outlines our commitment to preventing bribery and corruption as part of our overall Environmental, Social, and Governance (ESG) Policies.

POLICY STATEMENT:

Heritage Max Realtech Private Limited is committed to conducting business ethically, transparently, and in compliance with all applicable laws and regulations, including anti-bribery and anti-corruption laws. We unequivocally prohibit bribery, corruption, and unethical practices in all our activities, including interactions with government officials, business partners, contractors, suppliers, customers, and other stakeholders. Through this policy, we aim to:

- Establish a zero-tolerance approach to bribery, corruption, and unethical conduct within our organization and supply chain, and ensure that all employees, contractors, and partners are aware of and adhere to our anti-bribery and anti-corruption standards and requirements.
- Implement robust systems, controls, and procedures to prevent, detect, and deter bribery and corruption in all aspects of our operations, including procurement, contracting, sales, marketing, and project management.
- Provide training and education programs for employees, contractors, and partners to raise awareness of bribery and corruption risks, laws, and regulations, and empower them to recognize and resist bribery and corruption attempts.
- Conduct due diligence on business partners, contractors, suppliers, and other third parties to assess their integrity, reputation, and compliance with anti-bribery and anti-corruption standards and requirements, and mitigate associated risks.
- Maintain accurate records and documentation of all transactions, payments, and interactions with government officials, business partners, contractors, suppliers, and other stakeholders, ensuring transparency and accountability.
- Establish clear communication channels and reporting mechanisms for employees, contractors, and partners to raise concerns, report suspected instances of bribery or corruption, and seek guidance and assistance in addressing such issues.
- Investigate all reported or suspected instances of bribery or corruption promptly and thoroughly, and take appropriate disciplinary actions against individuals found to have engaged in such conduct, including termination of employment or contractual relationships.
- Cooperate fully with law enforcement authorities, regulators, and other relevant stakeholders in investigations and enforcement actions related to bribery and corruption, and support efforts to hold perpetrators accountable and promote adherence to ethical standards and the rule of law.

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GOALS:

Our goals under this policy include:

- Ensure compliance with all applicable anti-bribery and anti-corruption laws, regulations, and industry standards, as well as our internal policies and procedures, across all our operations and supply chains.
- Establish a culture of integrity, transparency, and accountability within our organization and supply chain, where bribery, corruption, and unethical conduct are not tolerated and are actively resisted and reported.
- Implement effective systems, controls, and procedures to prevent, detect, and deter bribery and corruption in all aspects of our operations, including procurement, contracting, sales, marketing, and project management.
- Provide training and education programs for employees, contractors, and partners to raise awareness of bribery and corruption risks, laws, and regulations, and empower them to recognize and resist bribery and corruption attempts.
- Conduct due diligence on business partners, contractors, suppliers, and other third parties to assess their integrity, reputation, and compliance with anti-bribery and anti-corruption standards and requirements, and mitigate associated risks.
- Maintain accurate records and documentation of all transactions, payments, and interactions with government officials, business partners, contractors, suppliers, and other stakeholders, ensuring transparency and accountability.
- Establish clear communication channels and reporting mechanisms for employees, contractors, and partners to raise concerns, report suspected instances of bribery or corruption, and seek guidance and assistance in addressing such issues.
- Investigate all reported or suspected instances of bribery or corruption promptly and thoroughly, and take appropriate disciplinary actions against individuals found to have engaged in such conduct, including termination of employment or contractual relationships.
- Cooperate fully with law enforcement authorities, regulators, and other relevant stakeholders in investigations and enforcement actions related to bribery and corruption, and support efforts to hold perpetrators accountable and promote adherence to ethical standards and the rule of law.

IMPLEMENTATION:

To achieve the objectives outlined in this policy, Heritage Max Realtech Private Limited will:

- Establish a dedicated anti-bribery and anti-corruption committee or task force responsible for overseeing the development, implementation, and evaluation of bribery and corruption prevention initiatives and programs.
- Conduct risk assessments and due diligence on business partners, contractors, suppliers, and other third parties to identify and mitigate bribery and corruption risks and ensure compliance with anti-bribery and anti-corruption standards and requirements.

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- Provide training and education programs for employees, contractors, and partners to raise awareness of bribery and corruption risks, laws, and regulations, and empower them to recognize and resist bribery and corruption attempts.
- Implement robust systems, controls, and procedures to prevent, detect, and deter bribery and corruption in all aspects of our operations, including procurement, contracting, sales, marketing, and project management.
- Maintain accurate records and documentation of all transactions, payments, and interactions with government officials, business partners, contractors, suppliers, and other stakeholders, ensuring transparency and accountability.
- Establish clear communication channels and reporting mechanisms for employees, contractors, and partners to raise concerns, report suspected instances of bribery or corruption, and seek guidance and assistance in addressing such issues.
- Investigate all reported or suspected instances of bribery or corruption promptly and thoroughly, and take appropriate disciplinary actions against individuals found to have engaged in such conduct, including termination of employment or contractual relationships.
- Cooperate fully with law enforcement authorities, regulators, and other relevant stakeholders in investigations and enforcement actions related to bribery and corruption, and support efforts to hold perpetrators accountable and promote adherence to ethical standards and the rule of law.

MONITORING AND REPORTING:

Heritage Max Realtech Private Limited will monitor and report on the implementation of our bribery and corruption policy through:

- Regular assessments, audits, and reviews of our operations and supply chains to evaluate compliance with anti-bribery and anti-corruption laws, regulations, and industry standards, and identify areas for improvement and action.
- Key performance indicators (KPIs) and metrics to measure and track our progress on bribery and corruption prevention goals and commitments, including the number and nature of reported or suspected instances of bribery or corruption, the effectiveness of controls and procedures, and the outcomes of investigations and disciplinary actions.
- Internal reporting mechanisms to communicate bribery and corruption prevention efforts, incidents, and initiatives to senior management, employees, contractors, suppliers, and other stakeholders, ensuring transparency and accountability.
- External reporting to stakeholders, including investors, customers, regulators, and the public, through our annual sustainability reports, corporate social responsibility disclosures, and other communication channels, demonstrating our commitment to ethical business conduct and responsible corporate citizenship.
- Engagement with stakeholders, including government authorities, regulators, industry associations, and civil society organizations, to share best practices, collaborate on bribery and corruption prevention initiatives, and advocate for policies and regulations that promote transparency, accountability, and integrity in business.

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CONCLUSION:

Heritage Max Realtech Private Limited is committed to preventing bribery and corruption in all aspects of our operations, including development projects, and to conducting business with integrity, transparency, and accountability. This policy reflects our dedication to ethical business conduct and our ongoing commitment to Environmental, Social, and Governance (ESG) principles. By establishing a zero-tolerance approach to bribery and corruption, implementing robust systems and controls, providing training and education, and fostering a culture of integrity and compliance, we aim to protect our organization's reputation, build trust with stakeholders, and contribute to sustainable development and prosperity.

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CYBERSECURITY POLICY

INTRODUCTION:

Heritage Max Realtech Private Limited recognizes the critical importance of cybersecurity in today's digital landscape. As a responsible organization, we are committed to safeguarding our data, systems, and networks from cyber threats to protect our assets, reputation, and stakeholders' interests. This policy outlines our comprehensive approach to cybersecurity as part of our overall Environmental, Social, and Governance (ESG) Policies.

POLICY STATEMENT:

Heritage Max Realtech Private Limited is dedicated to maintaining the highest standards of cybersecurity to mitigate the risks associated with cyber threats and vulnerabilities. We are committed to protecting our sensitive information, infrastructure, and operations from unauthorized access, data breaches, malware, and other cyber incidents. Through this policy, we aim to:

- Establish a robust cybersecurity framework comprising policies, procedures, and controls to safeguard our data, systems, and networks from cyber threats and vulnerabilities.
- Ensure compliance with relevant cybersecurity laws, regulations, and industry standards, as well as our internal policies and procedures, across all our operations and projects.
- Implement appropriate technical, administrative, and physical safeguards to protect our information assets, including encryption, access controls, firewalls, antivirus software, intrusion detection/prevention systems, and regular security updates and patches.
- Provide cybersecurity awareness training and education programs for employees, contractors, and partners to raise awareness of cyber threats, best practices, and their role in protecting our organization from cyber risks.
- Conduct regular risk assessments and vulnerability scans to identify and mitigate potential cybersecurity risks and weaknesses in our systems, networks, and applications.
- Develop and maintain incident response and business continuity plans to effectively respond to and recover from cyber incidents, ensuring minimal disruption to our operations and services.
- Establish clear communication channels and reporting mechanisms for employees, contractors, and partners to report suspected cybersecurity incidents promptly and accurately, and seek guidance and assistance in addressing such incidents.
- Collaborate with industry partners, government agencies, law enforcement authorities, and cybersecurity experts to share threat intelligence, best practices, and resources, and enhance our collective resilience against cyber threats.

GOALS:

Our goals under this policy include:

- Protect our sensitive information, infrastructure, and operations from cyber threats and vulnerabilities to safeguard our assets, reputation, and stakeholders' interests.

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- Establish a robust cybersecurity framework comprising policies, procedures, and controls to ensure compliance with relevant laws, regulations, and industry standards, and protect our organization from cyber risks.
- Implement appropriate technical, administrative, and physical safeguards to protect our information assets, including encryption, access controls, firewalls, antivirus software, intrusion detection/prevention systems, and regular security updates and patches.
- Provide cybersecurity awareness training and education programs for employees, contractors, and partners to raise awareness of cyber threats, best practices, and their role in protecting our organization from cyber risks.
- Conduct regular risk assessments and vulnerability scans to identify and mitigate potential cybersecurity risks and weaknesses in our systems, networks, and applications.
- Develop and maintain incident response and business continuity plans to effectively respond to and recover from cyber incidents, ensuring minimal disruption to our operations and services.
- Establish clear communication channels and reporting mechanisms for employees, contractors, and partners to report suspected cybersecurity incidents promptly and accurately, and seek guidance and assistance in addressing such incidents.
- Collaborate with industry partners, government agencies, law enforcement authorities, and cybersecurity experts to share threat intelligence, best practices, and resources, and enhance our collective resilience against cyber threats.

IMPLEMENTATION:

To achieve the objectives outlined in this policy, Heritage Max Realtech Private Limited will:

- Establish a dedicated cybersecurity team or task force responsible for overseeing the development, implementation, and evaluation of cybersecurity initiatives and programs.
- Conduct regular risk assessments and vulnerability scans to identify and prioritize cybersecurity risks and weaknesses in our systems, networks, and applications, and develop risk mitigation and remediation plans.
- Implement appropriate technical, administrative, and physical safeguards to protect our information assets, including encryption, access controls, firewalls, antivirus software, intrusion detection/prevention systems, and regular security updates and patches.
- Provide cybersecurity awareness training and education programs for employees, contractors, and partners to raise awareness of cyber threats, best practices, and their role in protecting our organization from cyber risks.
- Develop and maintain incident response and business continuity plans to effectively respond to and recover from cyber incidents, ensuring minimal disruption to our operations and services, and conducting regular exercises and simulations to test and improve our incident response capabilities.
- Establish clear communication channels and reporting mechanisms for employees, contractors, and partners to report suspected cybersecurity incidents promptly and accurately, and seek guidance and assistance in addressing such incidents, and ensure confidentiality, integrity, and anonymity of reporting.

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- Collaborate with industry partners, government agencies, law enforcement authorities, and cybersecurity experts to share threat intelligence, best practices, and resources, and enhance our collective resilience against cyber threats, and participate in cybersecurity information sharing and collaboration initiatives.
- Monitor and evaluate our cybersecurity performance through regular assessments, audits, and reviews, and take corrective actions and improvement measures as necessary to address any identified deficiencies or non-compliance, and report transparently and publicly on our cybersecurity performance, initiatives, and outcomes, demonstrating our commitment to cybersecurity due diligence, risk management, and accountability.

MONITORING AND REPORTING:

Heritage Max Realtech Private Limited will monitor and report on the implementation of our cybersecurity policy through:

- Regular assessments, audits, and reviews of our cybersecurity controls, procedures, and incidents to evaluate compliance with relevant laws, regulations, and industry standards, and identify areas for improvement and action.
- Key performance indicators (KPIs) and metrics to measure and track our progress on cybersecurity goals and commitments, including the number and nature of cybersecurity incidents, the effectiveness of controls and procedures, and the outcomes of risk assessments and vulnerability scans.
- Internal reporting mechanisms to communicate cybersecurity efforts, incidents, and initiatives to senior management, employees, contractors, suppliers, and other stakeholders, ensuring transparency and accountability.
- External reporting to stakeholders, including investors, customers, regulators, and the public, through our annual sustainability reports, corporate social responsibility disclosures, and other communication channels, demonstrating our commitment to cybersecurity due diligence, risk management, and accountability.
- Engagement with stakeholders, including industry partners, government agencies, law enforcement authorities, and cybersecurity experts, to share threat intelligence, best practices, and resources, and enhance our collective resilience against cyber threats, and participate in cybersecurity information sharing and collaboration initiatives.

CONCLUSION:

Heritage Max Realtech Private Limited is committed to maintaining the highest standards of cybersecurity to protect our data, systems, and networks from cyber threats and vulnerabilities. This policy reflects our dedication to safeguarding our assets, reputation, and stakeholders' interests, and our ongoing commitment to Environmental, Social, and Governance (ESG) principles. By establishing a robust

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cybersecurity framework, implementing appropriate safeguards and controls, providing training and education, and fostering collaboration and information sharing, we aim to enhance our resilience against cyber threats and contribute to a safer and more secure digital environment. This policy shall be regularly reviewed and updated as necessary to reflect changes in our business operations, regulatory requirements, industry standards, and best practices related to cybersecurity.

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DATA PROTECTION AND PRIVACY POLICY

INTRODUCTION:

At Heritage Max Realtech Private Limited, we recognize the critical importance of protecting the privacy and personal data of our stakeholders, including customers, employees, contractors, suppliers, and other partners. As part of our commitment to Environmental, Social, and Governance (ESG) principles, this Data Protection and Privacy Policy outlines our dedication to ensuring the highest standards of data protection and privacy in all our development projects and operations.

POLICY STATEMENT:

Heritage Max Realtech Private Limited is committed to safeguarding the privacy and personal data of all individuals with whom we interact, in compliance with applicable data protection laws, regulations, and industry standards. We are committed to upholding the principles of transparency, integrity, and accountability in our data processing activities and to implementing appropriate technical, organizational, and procedural measures to protect against unauthorized access, use, disclosure, alteration, or destruction of personal data. Through this policy, we aim to:

- Respect and protect the privacy and personal data of our stakeholders, including customers, employees, contractors, suppliers, and other partners, and comply with all applicable data protection laws, regulations, and industry standards.
- Establish clear policies, procedures, and guidelines for the collection, storage, processing, and sharing of personal data, ensuring transparency, fairness, and lawfulness in our data processing activities.
- Obtain consent from individuals before collecting, using, or disclosing their personal data for specified purposes, and provide individuals with clear and accessible information about their rights and choices regarding the processing of their personal data.
- Limit the collection, storage, processing, and sharing of personal data to the extent necessary to achieve legitimate business purposes and comply with legal and regulatory requirements, and implement appropriate measures to minimize the risk of unauthorized access, use, or disclosure of personal data.
- Implement technical, organizational, and procedural measures to protect the confidentiality, integrity, and availability of personal data, including encryption, access controls, data minimization, pseudonymization, and regular security assessments and audits.
- Provide training and education programs for employees, contractors, and partners to raise awareness of data protection and privacy risks, laws, and regulations, and empower them to recognize and address data protection and privacy issues.
- Establish clear communication channels and reporting mechanisms for individuals to exercise their rights regarding their personal data, including the right to access, rectify, erase, restrict, or object to the processing of their personal data, and to lodge complaints with relevant data protection authorities.
- Conduct data protection impact assessments (DPIAs) and privacy impact assessments (PIAs) for high-risk data processing activities, and consult with data protection authorities and other

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relevant stakeholders as necessary to ensure compliance with data protection laws, regulations, and industry standards.

- Monitor and evaluate our data protection and privacy performance through regular assessments, audits, and reviews, and take corrective actions and improvement measures as necessary to address any identified deficiencies or non-compliance.
- Cooperate with data protection authorities, regulators, industry associations, and other relevant stakeholders to promote best practices, share knowledge and expertise, and advance the field of data protection and privacy.

GOALS:

Our goals under this policy include:

- Respect and protect the privacy and personal data of our stakeholders, including customers, employees, contractors, suppliers, and other partners, and comply with all applicable data protection laws, regulations, and industry standards.
- Establish clear policies, procedures, and guidelines for the collection, storage, processing, and sharing of personal data, ensuring transparency, fairness, and lawfulness in our data processing activities.
- Obtain consent from individuals before collecting, using, or disclosing their personal data for specified purposes, and provide individuals with clear and accessible information about their rights and choices regarding the processing of their personal data.
- Limit the collection, storage, processing, and sharing of personal data to the extent necessary to achieve legitimate business purposes and comply with legal and regulatory requirements, and implement appropriate measures to minimize the risk of unauthorized access, use, or disclosure of personal data.
- Implement technical, organizational, and procedural measures to protect the confidentiality, integrity, and availability of personal data, including encryption, access controls, data minimization, pseudonymization, and regular security assessments and audits.
- Provide training and education programs for employees, contractors, and partners to raise awareness of data protection and privacy risks, laws, and regulations, and empower them to recognize and address data protection and privacy issues.
- Establish clear communication channels and reporting mechanisms for individuals to exercise their rights regarding their personal data, including the right to access, rectify, erase, restrict, or object to the processing of their personal data, and to lodge complaints with relevant data protection authorities.
- Conduct data protection impact assessments (DPIAs) and privacy impact assessments (PIAs) for high-risk data processing activities, and consult with data protection authorities and other relevant stakeholders as necessary to ensure compliance with data protection laws, regulations, and industry standards.
- Monitor and evaluate our data protection and privacy performance through regular assessments, audits, and reviews, and take corrective actions and improvement measures as necessary to address any identified deficiencies or non-compliance.

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- Cooperate with data protection authorities, regulators, industry associations, and other relevant stakeholders to promote best practices, share knowledge and expertise, and advance the field of data protection and privacy.

IMPLEMENTATION:

To achieve the objectives outlined in this policy, Heritage Max Realtech Private Limited will:

- Designate a Data Protection Officer (DPO) or a responsible individual or team to oversee the development, implementation, and evaluation of data protection and privacy initiatives and programs.
- Develop and maintain a comprehensive data protection and privacy framework comprising policies, procedures, and guidelines for the collection, storage, processing, and sharing of personal data, ensuring compliance with applicable data protection laws, regulations, and industry standards.
- Obtain consent from individuals before collecting, using, or disclosing their personal data for specified purposes, and provide individuals with clear and accessible information about their rights and choices regarding the processing of their personal data.
- Limit the collection, storage, processing, and sharing of personal data to the extent necessary to achieve legitimate business purposes and comply with legal and regulatory requirements and implement appropriate measures to minimize the risk of unauthorized access, use, or disclosure of personal data.
- Implement technical, organizational, and procedural measures to protect the confidentiality, integrity, and availability of personal data, including encryption, access controls, data minimization, pseudonymization, and regular security assessments and audits.
- Provide training and education programs for employees, contractors, and partners to raise awareness of data protection and privacy risks, laws, and regulations, and empower them to recognize and address data protection and privacy issues.
- Establish clear communication channels and reporting mechanisms for individuals to exercise their rights regarding their personal data, including the right to access, rectify, erase, restrict, or object to the processing of their personal data, and to lodge complaints with relevant data protection authorities.
- Conduct data protection impact assessments (DPIAs) and privacy impact assessments (PIAs) for high-risk data processing activities, and consult with data protection authorities and other relevant stakeholders as necessary to ensure compliance with data protection laws, regulations, and industry standards.
- Monitor and evaluate our data protection and privacy performance through regular assessments, audits, and reviews, and take corrective actions and improvement measures as necessary to address any identified deficiencies or non-compliance.
- Cooperate with data protection authorities, regulators, industry associations, and other relevant stakeholders to promote best practices, share knowledge and expertise, and advance the field of data protection and privacy.

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MONITORING AND REPORTING:

Heritage Max Realtech Private Limited will monitor and report on the implementation of our data protection and privacy policy through:

- Regular assessments, audits, and reviews of our data protection and privacy controls, procedures, and incidents to evaluate compliance with applicable data protection laws, regulations, and industry standards, and identify areas for improvement and action.
- Key performance indicators (KPIs) and metrics to measure and track our progress on data protection and privacy goals and commitments, including the number and nature of data protection incidents, the effectiveness of controls and procedures, and the outcomes of data protection impact assessments and privacy impact assessments.
- Internal reporting mechanisms to communicate data protection and privacy efforts, incidents, and initiatives to senior management, employees, contractors, suppliers, and other stakeholders, ensuring transparency and accountability.
- External reporting to stakeholders, including investors, customers, regulators, and the public, through our annual sustainability reports, corporate social responsibility disclosures, and other communication channels, demonstrating our commitment to data protection and privacy principles and compliance.
- Engagement with data protection authorities, regulators, industry associations, and other relevant stakeholders to promote best practices, share knowledge and expertise, and advance the field of data protection and privacy, and participate in data protection and privacy information sharing and collaboration initiatives.

CONCLUSION:

Heritage Max Realtech Private Limited is committed to safeguarding the privacy and personal data of our stakeholders and to complying with all applicable data protection laws, regulations, and industry standards. This policy reflects our dedication to protecting the confidentiality, integrity, and availability of personal data and our ongoing commitment to Environmental, Social, and Governance (ESG) principles. By establishing clear policies, procedures, and controls, providing training and education, and fostering collaboration and accountability, we aim to ensure the highest standards of data protection and privacy in all our development projects and operations. This policy shall be regularly reviewed and updated as necessary to reflect changes in our business operations, regulatory requirements, industry standards, and best practices related to data protection and privacy.

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FIDUCIARY DUTY POLICY

INTRODUCTION:

Heritage Max Realtech Private Limited recognizes the importance of upholding fiduciary duty as a fundamental principle guiding our business operations. As a responsible organization, we understand our obligation to act in the best interests of our stakeholders and to manage their resources with integrity, prudence, and transparency. This Fiduciary Duty Policy outlines our commitment to fulfilling our fiduciary responsibilities in all our development projects as part of our overall Environmental, Social, and Governance (ESG) Policies.

POLICY STATEMENT:

Heritage Max Realtech Private Limited is dedicated to fulfilling our fiduciary duty to our stakeholders, including shareholders, investors, customers, employees, contractors, suppliers, and the community at large. We recognize that our fiduciary responsibility extends beyond financial performance to encompass environmental stewardship, social responsibility, and ethical governance. Through this policy, we commit to:

- Act in the best interests of our stakeholders and manage their resources with integrity, prudence, and transparency.
- Make informed decisions that prioritize long-term sustainability and value creation over short-term gains.
- Exercise due diligence and care in the management of assets, investments, and projects, considering both financial and non-financial factors, risks, and opportunities.
- Disclose relevant information to stakeholders in a timely, accurate, and transparent manner, enabling them to make informed decisions.
- Avoid conflicts of interest and ensure that our actions and decisions are free from undue influence, bias, or self-dealing.
- Comply with all applicable laws, regulations, and industry standards, as well as our internal policies and procedures, in the conduct of our business.
- Foster a culture of accountability, responsibility, and ethical behavior among our employees, contractors, suppliers, and partners.
- Engage with stakeholders in a constructive and respectful manner, seeking their input, feedback, and collaboration in decision-making processes.
- Regularly assess and review our performance against fiduciary responsibilities and objectives, and take corrective actions and improvement measures as necessary.
- Report transparently and publicly on our fiduciary performance, initiatives, and outcomes, demonstrating our commitment to fiduciary duty and accountability.

GOALS:

Our goals under this policy include:

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- Acting in the best interests of our stakeholders and managing their resources with integrity, prudence, and transparency.
- Making informed decisions that prioritize long-term sustainability and value creation over short-term gains.
- Exercising due diligence and care in the management of assets, investments, and projects, considering both financial and non-financial factors, risks, and opportunities.
- Disclosing relevant information to stakeholders in a timely, accurate, and transparent manner, enabling them to make informed decisions.
- Avoiding conflicts of interest and ensuring that our actions and decisions are free from undue influence, bias, or self-dealing.
- Complying with all applicable laws, regulations, and industry standards, as well as our internal policies and procedures, in the conduct of our business.
- Fostering a culture of accountability, responsibility, and ethical behavior among our employees, contractors, suppliers, and partners.
- Engaging with stakeholders in a constructive and respectful manner, seeking their input, feedback, and collaboration in decision-making processes.
- Regularly assessing and reviewing our performance against fiduciary responsibilities and objectives, and taking corrective actions and improvement measures as necessary.
- Reporting transparently and publicly on our fiduciary performance, initiatives, and outcomes, demonstrating our commitment to fiduciary duty and accountability.

IMPLEMENTATION:

To achieve the objectives outlined in this policy, Heritage Max Realtech Private Limited will:

- Establish clear policies, procedures, and guidelines for fulfilling our fiduciary duty to stakeholders, including principles for decision-making, risk management, and reporting.
- Integrate fiduciary considerations into our strategic planning, investment decisions, project evaluations, and performance assessments, considering both financial and non-financial factors, risks, and opportunities.
- Provide training and education programs for employees, contractors, and partners to raise awareness of fiduciary responsibilities, ethical principles, and best practices, and empower them to uphold these principles in their daily work.
- Implement robust systems and controls to monitor and evaluate our fiduciary performance, including regular assessments, audits, and reviews of financial and operational activities, and take corrective actions and improvement measures as necessary.
- Foster a culture of accountability, responsibility, and ethical behavior among our employees, contractors, suppliers, and partners, through clear communication, incentives, recognition, and disciplinary measures as appropriate.
- Engage with stakeholders in a transparent and inclusive manner, seeking their input, feedback, and collaboration in decision-making processes, and addressing their concerns and grievances in a timely and effective manner.

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- Regularly review and update this policy and related procedures to reflect changes in our business operations, regulatory requirements, industry standards, and best practices related to fiduciary duty and accountability.

MONITORING AND REPORTING:

Heritage Max Realtech Private Limited will monitor and report on the implementation of our fiduciary duty policy through:

- Regular assessments, audits, and reviews of our fiduciary performance, including financial and operational activities, risk management practices, and stakeholder engagement efforts, to evaluate compliance with applicable laws, regulations, and industry standards, and identify areas for improvement and action.
- Key performance indicators (KPIs) and metrics to measure and track our progress on fiduciary goals and objectives, including financial performance, risk exposure, stakeholder satisfaction, and ethical behavior, and report transparently and publicly on our fiduciary performance, initiatives, and outcomes.
- Internal reporting mechanisms to communicate fiduciary efforts, incidents, and initiatives to senior management, board of directors, employees, contractors, suppliers, and other stakeholders, ensuring transparency and accountability.
- External reporting to stakeholders, including investors, regulators, industry associations, and the public, through our annual financial reports, corporate governance disclosures, sustainability reports, and other communication channels, demonstrating our commitment to fiduciary duty and accountability.

CONCLUSION:

Heritage Max Realtech Private Limited is committed to upholding fiduciary duty as a fundamental principle guiding our business operations. This policy reflects our dedication to acting in the best interests of our stakeholders and managing their resources with integrity, prudence, and transparency. By establishing clear policies, procedures, and controls, providing training and education, and fostering a culture of accountability and ethical behavior, we aim to ensure the highest standards of fiduciary duty in all our development projects and operations. This policy shall be regularly reviewed and updated as necessary to reflect changes in our business operations, regulatory requirements, industry standards, and best practices related to fiduciary duty and accountability.

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PREVENTION OF FRAUD POLICY

INTRODUCTION:

At Heritage Max Realtech Private Limited, we recognize the importance of maintaining the highest standards of integrity and ethical conduct in all aspects of our operations. Fraud poses a significant risk to our organization, impacting our financial stability, reputation, and stakeholder trust. This Prevention of Fraud Policy outlines our commitment to preventing, detecting, and addressing fraud in our development projects as part of our overall Environmental, Social, and Governance (ESG) Policies.

POLICY STATEMENT:

Heritage Max Realtech Private Limited is committed to preventing, detecting, and addressing fraud in all our development projects and operations. We understand that fraud undermines trust, integrity, and accountability, and poses significant risks to our organization, stakeholders, and the communities we serve. Through this policy, we aim to:

- Establish a culture of integrity, honesty, and ethical behavior among our employees, contractors, suppliers, and partners, and communicate our zero-tolerance approach to fraud.
- Identify and assess the risks of fraud in our development projects and operations, including potential areas of vulnerability and exposure to fraudulent activities.
- Implement effective fraud prevention measures, controls, and procedures to mitigate identified risks and strengthen our internal control environment.
- Provide training and education programs for employees, contractors, suppliers, and partners to raise awareness of fraud risks, red flags, and reporting mechanisms, and empower them to recognize and report suspected fraudulent activities.
- Establish clear reporting channels and whistleblower protections to encourage individuals to report suspected fraud, misconduct, or unethical behavior without fear of retaliation.
- Conduct regular fraud risk assessments, audits, and investigations to identify, investigate, and address suspected or reported incidents of fraud promptly and effectively.
- Take appropriate disciplinary and legal actions against individuals found to have engaged in fraudulent activities, including termination of employment, contract termination, restitution, and legal proceedings.
- Collaborate with law enforcement authorities, regulatory agencies, industry associations, and other relevant stakeholders to share information, best practices, and resources, and enhance our collective efforts to prevent and combat fraud.
- Monitor and evaluate our fraud prevention efforts and outcomes through regular assessments, audits, and reviews, and take corrective actions and improvement measures as necessary to strengthen our anti-fraud measures and controls.
- Report transparently and publicly on our fraud prevention efforts, initiatives, and outcomes, demonstrating our commitment to integrity, accountability, and ethical conduct.

GOALS:

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Our goals under this policy include:

- Establishing a culture of integrity, honesty, and ethical behavior among our employees, contractors, suppliers, and partners, and communicating our zero-tolerance approach to fraud.
- Identifying and assessing the risks of fraud in our development projects and operations, and implementing effective fraud prevention measures, controls, and procedures to mitigate identified risks.
- Providing training and education programs for employees, contractors, suppliers, and partners to raise awareness of fraud risks, red flags, and reporting mechanisms, and empowering them to recognize and report suspected fraudulent activities.
- Establishing clear reporting channels and whistleblower protections to encourage individuals to report suspected fraud, misconduct, or unethical behavior without fear of retaliation.
- Conducting regular fraud risk assessments, audits, and investigations to identify, investigate, and address suspected or reported incidents of fraud promptly and effectively.
- Taking appropriate disciplinary and legal actions against individuals found to have engaged in fraudulent activities, including termination of employment, contract termination, restitution, and legal proceedings.
- Collaborating with law enforcement authorities, regulatory agencies, industry associations, and other relevant stakeholders to share information, best practices, and resources, and enhance our collective efforts to prevent and combat fraud.
- Monitoring and evaluating our fraud prevention efforts and outcomes through regular assessments, audits, and reviews, and taking corrective actions and improvement measures as necessary to strengthen our anti-fraud measures and controls.
- Reporting transparently and publicly on our fraud prevention efforts, initiatives, and outcomes, demonstrating our commitment to integrity, accountability, and ethical conduct.

IMPLEMENTATION:

To achieve the objectives outlined in this policy, Heritage Max Realtech Private Limited will:

- Establish a Fraud Prevention Committee or designate a responsible individual or team to oversee the development, implementation, and evaluation of fraud prevention initiatives and programs.
- Conduct regular fraud risk assessments and reviews to identify potential areas of vulnerability and exposure to fraudulent activities in our development projects and operations.
- Implement effective fraud prevention measures, controls, and procedures to mitigate identified risks, including segregation of duties, authorization controls, access restrictions, monitoring and surveillance systems, and employee background checks.
- Provide training and education programs for employees, contractors, suppliers, and partners to raise awareness of fraud risks, red flags, and reporting mechanisms, and empower them to recognize and report suspected fraudulent activities.
- Establish clear reporting channels and whistleblower protections, such as anonymous hotlines or email addresses, to facilitate the reporting of suspected fraud, misconduct, or unethical behavior, and ensure confidentiality, anonymity, and protection against retaliation for whistleblowers.

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- Conduct thorough and impartial investigations of suspected or reported incidents of fraud, misconduct, or unethical behavior, and take appropriate disciplinary and legal actions against individuals found to have engaged in fraudulent activities.
- Collaborate with law enforcement authorities, regulatory agencies, industry associations, and other relevant stakeholders to share information, best practices, and resources, and enhance our collective efforts to prevent and combat fraud.
- Monitor and evaluate our fraud prevention efforts and outcomes through regular assessments, audits, and reviews, and take corrective actions and improvement measures as necessary to strengthen our anti-fraud measures and controls.
- Communicate transparently and publicly on our fraud prevention efforts, initiatives, and outcomes through our annual sustainability reports, corporate governance disclosures, and other communication channels, demonstrating our commitment to integrity, accountability, and ethical conduct.

MONITORING AND REPORTING:

Heritage Max Realtech Private Limited will monitor and report on the implementation of our fraud prevention policy through:

- Regular assessments, audits, and reviews of our fraud prevention measures, controls, and procedures to evaluate compliance with applicable laws, regulations, and industry standards, and identify areas for improvement and action.
- Key performance indicators (KPIs) and metrics to measure and track our progress on fraud prevention goals and objectives, including the number and nature of reported fraud incidents, the effectiveness of controls and procedures, and the outcomes of fraud risk assessments and investigations.
- Internal reporting mechanisms to communicate fraud prevention efforts, incidents, and initiatives to senior management, board of directors, employees, contractors, suppliers, and other stakeholders, ensuring transparency and accountability.
- External reporting to stakeholders, including investors, regulators, industry associations, and the public, through our annual financial reports, corporate governance disclosures, sustainability reports, and other communication channels, demonstrating our commitment to integrity, accountability, and ethical conduct.

CONCLUSION:

Heritage Max Realtech Private Limited is committed to preventing, detecting, and addressing fraud in all our development projects and operations. This policy reflects our dedication to upholding the highest standards of integrity, honesty, and ethical conduct, and our zero-tolerance approach to fraud. By establishing a culture of integrity, implementing effective fraud prevention measures, providing training and education, fostering reporting and accountability, and collaborating with stakeholders, we aim to strengthen our resilience against fraud and protect the interests of our stakeholders and the communities we serve. This policy shall be regularly reviewed and updated as necessary to reflect changes in our

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business operations, regulatory requirements, industry standards, and best practices related to fraud prevention and detection.

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SHAREHOLDER RIGHTS POLICY

INTRODUCTION:

Heritage Max Realtech Private Limited recognizes the importance of upholding shareholder rights as a cornerstone of corporate governance and accountability. Shareholders play a crucial role in our organization, providing capital and oversight to support our growth and sustainability. This Shareholder Rights Policy outlines our commitment to protecting and promoting the rights of our shareholders in all our development projects as part of our overall Environmental, Social, and Governance (ESG) Policies.

POLICY STATEMENT:

Heritage Max Realtech Private Limited is committed to upholding and respecting the rights of our shareholders as integral stakeholders in our organization. We recognize that safeguarding shareholder rights is essential for fostering trust, transparency, and accountability, and enhancing long-term value creation for all stakeholders. Through this policy, we aim to:

- Recognize and respect the legal and contractual rights of our shareholders, including rights related to ownership, voting, dividends, information, and participation in decision-making processes.
- Ensure equal treatment of all shareholders, regardless of their size or type of ownership, and refrain from engaging in actions that unfairly disadvantage any shareholder group.
- Provide timely and accurate information to shareholders on matters relevant to their investment, including financial performance, strategic direction, governance practices, and material risks and opportunities.
- Facilitate shareholder engagement and dialogue, allowing shareholders to express their views, concerns, and expectations, and providing opportunities for constructive interaction with management and the board of directors.
- Protect minority shareholder rights, including the right to dissent, the right to nominate directors, and the right to take legal action to address perceived breaches of fiduciary duty or corporate misconduct.
- Respect the confidentiality of shareholder information and use shareholder data only for legitimate business purposes, in accordance with applicable laws, regulations, and industry standards.
- Encourage shareholder activism and responsible ownership practices, recognizing the valuable role that engaged shareholders play in promoting corporate governance, sustainability, and long-term value creation.
- Comply with all applicable laws, regulations, and listing requirements governing shareholder rights, and adopt best practices and industry standards to enhance shareholder protections and promote good corporate governance.
- Establish clear procedures and mechanisms for shareholders to exercise their rights effectively, including voting at shareholder meetings, submitting proposals and resolutions, and raising concerns or grievances with the company.

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- Monitor and evaluate our performance in upholding shareholder rights through regular assessments, audits, and reviews, and take corrective actions and improvement measures as necessary to strengthen our practices and procedures.

GOALS:

Our goals under this policy include:

- Recognizing and respecting the legal and contractual rights of our shareholders, including rights related to ownership, voting, dividends, information, and participation in decision-making processes.
- Ensuring equal treatment of all shareholders, regardless of their size or type of ownership, and refraining from engaging in actions that unfairly disadvantage any shareholder group.
- Providing timely and accurate information to shareholders on matters relevant to their investment, including financial performance, strategic direction, governance practices, and material risks and opportunities.
- Facilitating shareholder engagement and dialogue, allowing shareholders to express their views, concerns, and expectations, and providing opportunities for constructive interaction with management and the board of directors.
- Protecting minority shareholder rights, including the right to dissent, the right to nominate directors, and the right to take legal action to address perceived breaches of fiduciary duty or corporate misconduct.
- Respecting the confidentiality of shareholder information and using shareholder data only for legitimate business purposes, in accordance with applicable laws, regulations, and industry standards.
- Encouraging shareholder activism and responsible ownership practices, recognizing the valuable role that engaged shareholders play in promoting corporate governance, sustainability, and long-term value creation.
- Complying with all applicable laws, regulations, and listing requirements governing shareholder rights, and adopting best practices and industry standards to enhance shareholder protections and promote good corporate governance.
- Establishing clear procedures and mechanisms for shareholders to exercise their rights effectively, including voting at shareholder meetings, submitting proposals and resolutions, and raising concerns or grievances with the company.
- Monitoring and evaluating our performance in upholding shareholder rights through regular assessments, audits, and reviews, and taking corrective actions and improvement measures as necessary to strengthen our practices and procedures.

IMPLEMENTATION:

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To achieve the objectives outlined in this policy, Heritage Max Realtech Private Limited will:

- Establish clear policies, procedures, and guidelines for upholding shareholder rights and ensuring compliance with applicable laws, regulations, and listing requirements.
- Communicate our commitment to shareholder rights and responsibilities to all stakeholders, including shareholders, management, employees, contractors, suppliers, and partners.
- Provide training and education programs for employees, contractors, and partners to raise awareness of shareholder rights, governance principles, and best practices, and empower them to uphold these principles in their daily work.
- Implement robust systems and controls to monitor and evaluate our performance in upholding shareholder rights, including mechanisms for shareholder engagement, communication, and participation.
- Establish clear procedures and mechanisms for shareholders to exercise their rights effectively, including voting at shareholder meetings, submitting proposals and resolutions, and raising concerns or grievances with the company.
- Ensure transparency and accountability in our governance practices and decision-making processes, providing shareholders with timely and accurate information on matters relevant to their investment.
- Engage with shareholders in a constructive and respectful manner, seeking their input, feedback, and collaboration in decision-making processes, and addressing their concerns and grievances in a timely and effective manner.
- Comply with all applicable laws, regulations, and listing requirements governing shareholder rights, and adopt best practices and industry standards to enhance shareholder protections and promote good corporate governance.
- Regularly review and update this policy and related procedures to reflect changes in our business operations, regulatory requirements, industry standards, and best practices related to shareholder rights and corporate governance.
- Monitor and evaluate our performance in upholding shareholder rights through regular assessments, audits, and reviews, and take corrective actions and improvement measures as necessary to strengthen our practices and procedures.

MONITORING AND REPORTING:

Heritage Max Realtech Private Limited will monitor and report on the implementation of our shareholder rights policy through:

- Regular assessments, audits, and reviews of our governance practices and procedures to evaluate compliance with applicable laws, regulations, and industry standards, and identify areas for improvement and action.
- Key performance indicators (KPIs) and metrics to measure and track our progress on shareholder rights goals and objectives, including shareholder engagement, communication, and participation, and report transparently and publicly on our performance, initiatives, and outcomes.

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- Internal reporting mechanisms to communicate shareholder rights efforts, incidents, and initiatives to senior management, board of directors, employees, contractors, suppliers, and other stakeholders, ensuring transparency and accountability.
- External reporting to shareholders, regulators, industry associations, and the public, through our annual financial reports, corporate governance disclosures, sustainability reports, and other communication channels, demonstrating our commitment to shareholder rights and corporate governance.

CONCLUSION:

Heritage Max Realtech Private Limited is committed to upholding and respecting the rights of our shareholders as integral stakeholders in our organization. This policy reflects our dedication to promoting trust, transparency, and accountability in our governance practices and enhancing long-term value creation for all stakeholders. By establishing clear policies, procedures, and controls, providing training and education, fostering shareholder engagement and participation, and monitoring and reporting on our performance, we aim to strengthen our commitment to shareholder rights and corporate governance. This policy shall be regularly reviewed and updated as necessary to reflect changes in our business operations, regulatory requirements, industry standards, and best practices related to shareholder rights and corporate governance.