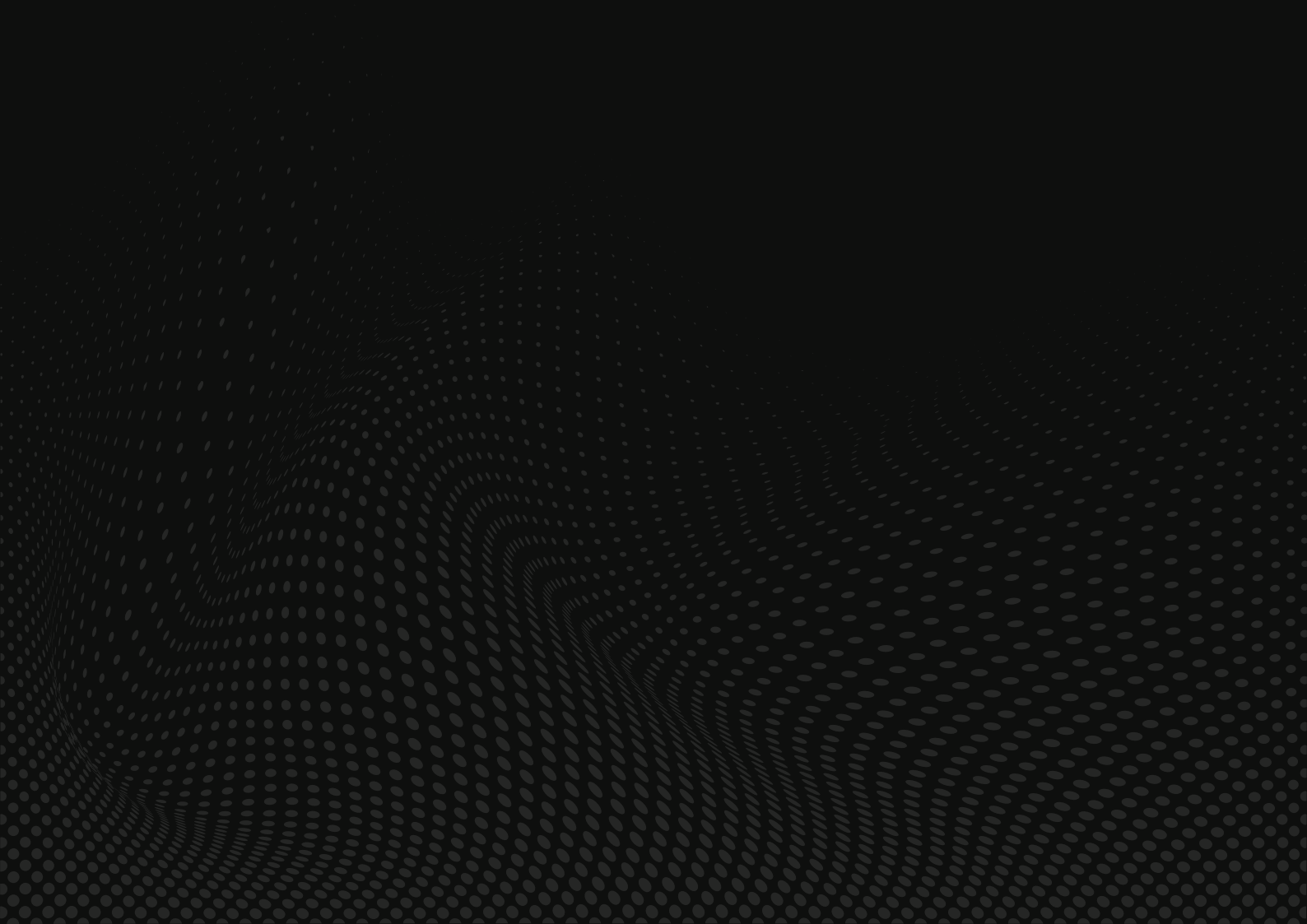




CODE OF CONDUCT

INTEGRITY • TRANSPARENCY • ACCOUNTABILITY • RESPECT



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1. Purpose and policy statement

Assetz is committed to creating long-term value through design excellence, sustainability, quality and trust. This Code translates that commitment into the minimum standards of conduct expected whenever we work for, represent or act on behalf of Assetz.

We comply with the letter and spirit of applicable law, keep accurate records, deal fairly with stakeholders, safeguard people and information, and avoid conduct that could compromise—or appear to compromise—our judgement. No commercial target, project deadline or instruction from a senior person justifies unlawful, unsafe, misleading or unethical conduct.

When in doubt, pause and ask:

Is it lawful? Is it consistent with Assetz values and policy? Is it fair to affected stakeholders? Would I be comfortable if it were independently reviewed or made public? If the answer is unclear, seek guidance before acting.

2. Scope and application

This Code applies to all directors, partners, officers, permanent and temporary employees, trainees, interns, consultants, contract staff and other persons working for or representing Assetz and its controlled entities (“Covered Persons”), across offices, project sites, sales galleries, customer or vendor locations, work travel, events, digital channels and remote work.

Vendors, contractors, channel partners, brokers, agents, consultants, joint-venture partners and other third parties are expected to meet equivalent standards where relevant. Business functions engaging them must communicate the applicable requirements, conduct proportionate due diligence, include appropriate contractual obligations and monitor performance.

Where law, contract or a specialist Assetz policy imposes a higher standard, the higher standard applies. This Code should be read with applicable policies on anti-bribery and corruption, prevention of sexual harassment (POSH), equal opportunity, whistleblowing/grievance reporting, information security, data privacy, health and safety, procurement, records management and delegation of authority.

3. Core responsibilities

3.1 Every Covered Person must

- Read, understand and comply with this Code, relevant policies, contractual duties and applicable laws.
- Exercise sound judgement, complete required declarations and training, and seek advice before acting where requirements are unclear.
- Raise suspected misconduct promptly and cooperate honestly in reviews, audits and investigations.
- Protect people who raise concerns in good faith from retaliation.
- Never direct, authorize, ignore or conceal conduct that would breach this Code.

3.2 Managers and leaders must additionally

- Model the required behavior and reinforce that results must be achieved ethically.
- Create a speak-up environment, listen without prejudging, escalate concerns promptly and preserve confidentiality.
- Apply controls consistently, avoid retaliation and address misconduct regardless of seniority or performance.
- Ensure team members and relevant third parties understand requirements applicable to their work.

4. Lawful, honest and professional conduct

Covered Persons must act honestly, respectfully, competently and in Assetz's legitimate interests. They must follow lawful and reasonable work instructions, perform duties with due care, attend work as required, provide complete and timely information, and avoid behavior that disrupts productivity or damages stakeholder trust.

No person may falsify, backdate, conceal, destroy improperly or misrepresent any application, approval, title document, plan, contract, invoice, attendance or expense record, customer communication, construction or quality record, regulatory filing, financial entry or other business information. Omissions designed to mislead are treated as misrepresentation.

5. Real-estate regulatory and project integrity

Given Assetz's business, ethical conduct must be evident throughout land acquisition, design, approvals, construction, procurement, marketing, sales, handover and post-sales service.

- **Land and title:** Undertake and document required title, ownership, encumbrance, land-use and counter party diligence. Do not suppress material title risks, disputes, restrictions, commitments or related-party interests.
- **Approvals and liaison:** Obtain approvals lawfully and maintain complete records. Do not make unofficial payments, use improper influence, misstate facts, submit fabricated documents or bypass mandatory conditions.
- **Project registration and disclosures:** Ensure project, phase, plan, timeline, approval, carpet-area and other disclosures are accurate, authorized and consistent with applicable RERA requirements and approved records.
- **Marketing and sales:** Do not make false, exaggerated, unapproved or unverifiable claims about approvals, specifications, views, amenities, returns, completion or possession dates, pricing, discounts or availability. Material qualifications must not be hidden.
- **Customer funds and collections:** Accept and account for consideration only through authorized processes. Do not solicit cash, personal transfers, side arrangements, unrecorded premiums or payments to unauthorized persons.
- **Design, quality and construction:** Do not conceal defects, substitute specified materials without authority, compromise tests or certifications, or alter approved plans, scopes or specifications outside authorized legal and governance processes.

- **Handover and after-sales:** Provide accurate documentation and address customer queries, defects and commitments fairly, promptly and through approved channels.
- **Community and environment:** Respect neighbouring communities, workers, landowners and the environment; comply with applicable consent, pollution-control, waste, water, heritage and sustainability requirements.

6. Fair dealing with customers and other stakeholders

Treat customers, landowners, investors, lenders, authorities, suppliers, channel partners, colleagues and communities fairly and professionally. Do not deceive, coerce, discriminate against, exploit, intimidate or take unfair advantage of any person through manipulation, concealment, misuse of confidential information or abuse of position.

Customer complaints, legal notices and regulatory queries must be recorded and routed promptly to the responsible function. Only authorized persons may make commitments, settle claims, vary contractual terms or represent Assetz before authorities or external parties.

7. Conflicts of interest

A conflict exists when personal, family, social, political or financial interests could influence—or reasonably appear to influence—objective business judgement. Actual, potential and perceived conflicts must be disclosed promptly to the employee's manager and HR/Legal & Compliance, and the person must not participate in the affected decision until guidance is received.

Examples include:

- A personal or family interest in land, a counterparty, vendor, contractor, broker, consultant, customer transaction or competitor connected with Assetz business.
- Influencing recruitment, appraisal, compensation, procurement, vendor selection, contracting, payment, customer allocation or dispute resolution involving a relative or close associate.
- Receiving personal benefits, preferential property allotments, commissions, referral fees, rebates, investment opportunities or business leads because of one's Assetz role.
- Using Assetz information, position, time, property, contacts or opportunities for personal gain.
- Outside employment, advisory work, directorship, business activity or public role that competes with, supplies to, transacts with or interferes with duties to Assetz.

Relationships within a direct or indirect reporting, control or decision-making chain must be disclosed to HR so that appropriate safeguards can be considered. A disclosure is not an admission of wrongdoing; failing to disclose may itself be misconduct.

8. Anti-bribery, facilitation payments, gifts and hospitality

Assetz prohibits bribery and corruption in public- and private-sector dealings. Covered Persons must not directly or indirectly offer, promise, authorize, give, request or accept money, a kickback, excessive commission, favour, employment opportunity, donation, gift, hospitality or anything of value to secure an improper advantage or influence a decision.

Facilitation or "speed" payments are prohibited, including payments intended to accelerate routine approvals or services. If a payment is made under an immediate and credible threat to health or safety, the person must prioritize safety and report the circumstances and payment promptly to Legal & Compliance and Finance.

Gifts and hospitality must be lawful, infrequent, modest, transparent, for a legitimate business purpose and never cash or cash equivalents. They must not be offered or accepted during a live tender, negotiation, approval, inspection, certification, claim or other decision that the recipient can influence. Applicable monetary thresholds, pre-approvals and declaration-register requirements in the Anti-Bribery and sensitive, declare the item promptly and follow Assetz's direction on return, sharing or donation. Corruption / Gifts and Hospitality Policy must be followed. If declining is impractical or culturally sensitive, declare the item promptly and follow Assetz's direction on return, sharing or donation.

9. Third parties, procurement and payments

- Select vendors, contractors, consultants, brokers and channel partners objectively on documented criteria such as capability, quality, safety, sustainability, compliance, past performance, service, price and total value—not personal benefit.
- Conduct risk-based diligence on identity, ownership, reputation, conflicts, qualifications, sanctions/adverse information and use of subcontractors before engagement and periodically thereafter.
- Use written contracts, approved scopes, commercially reasonable fees and required compliance clauses. No undisclosed side letters or verbal commitments.
- Keep bids, comparisons, approvals, measurement books, change orders, certifications, invoices and payment records accurate and auditable. Do not split orders or manipulate specifications to evade approval limits or favour a bidder.
- Pay only the contracted service provider, through approved banking and accounts-payable processes, against genuine services or goods and satisfactory supporting records.
- Escalate red flags such as unusual commissions, cash requests, payment to unrelated accounts, refusal to disclose ownership, weak qualifications, unexplained urgency, inflated invoices or a request to bypass controls.

10. Confidentiality, privacy and information security

Use confidential and personal information only for authorized business purposes, on a need-to-know basis and through approved systems. Protect information relating to land and title, acquisitions, designs, pricing, bids, contracts, customers, employees, investors, lenders, litigation, finances, strategy, security credentials and other non-public matters during and after employment or engagement.

- Do not disclose information to unauthorized persons, including relatives, friends, colleagues without a business need, competitors or external parties.
- Do not auto-forward work email, upload business information to personal email, storage, messaging or unapproved AI/cloud tools, or make unauthorized recordings or copies.
- Collect, access, use, share, retain and delete personal data only as authorized and in accordance with Assetz privacy notices, consent/other lawful-use requirements, retention rules and applicable law.
- Use strong access controls, protect passwords and devices, follow clean-desk and secure disposal practices, and report loss, phishing, unauthorized access or suspected data breach immediately.
- Do not use confidential information for property dealing, securities/investment decisions, personal advantage or to benefit another person.

11. Intellectual property and business records

Work products created within the scope of employment or engagement—including designs, drawings, specifications, processes, software, data, research, content and improvements—must be protected and handled in accordance with contractual and legal ownership requirements. Respect third-party intellectual property; use only properly licensed software, images, plans, data and content.

Create and retain complete, accurate and timely records in approved repositories. Follow legal holds, audit instructions and retention schedules. Never destroy, alter or hide a record to obstruct an audit, inquiry, dispute, regulatory review or investigation.

12. Respectful, inclusive and harassment-free workplace

Assetz is committed to a workplace free from discrimination, bullying, harassment, sexual harassment, victimization, threats, violence and retaliation. Treat every person with dignity regardless of legally protected status or personal background. The standard applies to in-person and digital interactions, work travel, events, customer/vendor sites and project locations.

Sexual harassment concerns will be handled under the applicable POSH policy and law, including through the Internal Committee where relevant. Other workplace concerns should be raised through HR or the designated reporting channel. Nothing in this Code limits a person's right to approach a statutory authority.

13. Health, safety, security and substance misuse

- Follow occupational health, fire, emergency, access-control, permit-to-work, personal protective equipment and project-site safety requirements. Stop and report work presenting an imminent risk.
- Report injuries, near misses, unsafe conditions, environmental incidents, security breaches and damage promptly; never suppress or manipulate safety or quality data.
- Do not possess illegal drugs, weapons or explosives, or work while impaired by alcohol, drugs or any substance that makes work unsafe. Seek guidance on where prescribed medication may affect safety-sensitive duties.
- Maintain orderly, secure workplaces and protect employees, customers, visitors, contractors, communities and assets.

14. Company assets, systems and time

Use Assetz funds, equipment, premises, vehicles, supplies, systems, brand and working time responsibly and primarily for authorized business. Limited incidental personal use may be permitted if lawful, reasonable, secure, non-commercial and not disruptive or costly, subject to applicable policy.

Theft, unauthorized removal, deliberate damage, unsafe operation, personal profiteering, gambling, illegal activity, unauthorized solicitation, installation or copying of unlicensed software, and circumvention of security controls are prohibited. Return all property, records and access credentials when requested or when employment/engagement ends.

15. Communications, social media and use of the Assetz name

Communicate courteously, accurately and professionally, remembering that messages may become permanent records. Only authorized spokespersons may speak to media, investors, regulators or the public on behalf of Assetz, issue press statements, approve advertising, or publish official content.

Personal social-media use must not disclose confidential information, customer/employee data, site security details or internal images; misrepresent personal views as Assetz's position; use Assetz intellectual property without authority; or harass, discriminate against or defame others. Refer external requests for company information to the authorized Corporate Communications, Legal or leadership contact.

16. Political, charitable and community activity

Personal civic or political activity must be lawful, voluntary, conducted in a personal capacity and must not use Assetz funds, facilities, name, time or pressure on colleagues. Any corporate political contribution is prohibited unless expressly permitted by law and approved under Assetz policy and governance requirements. Charitable contributions, sponsorships and community investments must be legitimate, transparent, with appropriate diligence and never used to obtain an improper advantage.

17. Attendance, outside work and professional conduct

Employees must comply with applicable attendance, leave and working-time requirements; notify the manager promptly of unexpected absence or delay; and obtain required approval for planned absence. Outside work, business interests, directorships or advisory roles require prior written disclosure and approval where required by employment terms or policy and must not compete with Assetz, create a conflict, misuse confidential information or impair performance.

Employees must maintain professional appearance appropriate to their role, location, safety requirements and stakeholder interaction, without discriminatory application of standards.

18. Prohibited conduct

The following are examples of misconduct. The list is illustrative, not exhaustive, and related items are consolidated to avoid repetition:

- Fraud, theft, bribery, corruption, kickbacks, misappropriation, dishonest claims, falsification, concealment or unauthorized alteration of records.
- Insubordination; willful refusal of lawful and reasonable instructions; serious neglect of duty; deliberate interference with another person's work or business operations.
- Unauthorized absence, persistent lateness, sleeping on duty or misuse of leave/attendance records.
- Harassment, sexual harassment, discrimination, bullying, abusive or obscene language, intimidation, threats, violence, retaliation or maliciously spreading information intended to cause harm.
- Breach of confidentiality, privacy, information security, intellectual-property rights or legal/contractual restrictions.
- Unsafe conduct, sabotage, tampering with safety or security equipment, possession of prohibited weapons or substances, or impairment at work.
- Damage, misuse, unauthorized removal or personal commercial use of company, employee, customer, vendor or visitor property.

- Undisclosed conflicts, prohibited outside employment, misuse of position or business opportunities, or favoritism in decisions.
- Misleading a customer, regulator, lender, landowner, investor, auditor or other stakeholder; unauthorized commitment; or concealment of a material project, quality, title, approval or safety issue.
- Circumventing delegated authority, procurement, payment, IT, security, legal, quality, safety or regulatory controls.
- Conduct inside or outside work that has a material and demonstrable, adverse connection to Assetz's legitimate interests, safety, legal compliance or reputation.

19. Speak up, advice and non-retaliation

Raise a concern as soon as possible through any available channel appropriate to the matter: the reporting manager, another manager, HR, Legal & Compliance, the designated ethics/whistleblowing channel, Information Security, or the Internal Committee for POSH matters. Reporting details should be published with this Code: [insert email / hotline / portal / postal address].

Reports should be made honestly and in good faith; proof is not required before raising a concern. Assetz will protect confidentiality as far as reasonably possible, assess reports impartially and prohibit retaliation against anyone who reports or participates in an inquiry in good faith. Knowingly false or malicious allegations, evidence tampering, obstruction and retaliation may lead to disciplinary action; an unsubstantiated good-faith concern will not.

20. Investigations, cooperation and disciplinary action

Assetz may review suspected breaches promptly, fairly and with appropriate confidentiality. Covered Persons must cooperate, preserve relevant information and avoid independent investigation, interference, retaliation or discussion that could compromise the process. Outcomes will be determined on the facts, applicable law, contract and policy, with an opportunity to respond where required.

Breaches may result in counselling, training, recovery of loss, withdrawal of authority, warning, suspension, reassignment, termination of employment or contract, reporting to authorities, civil recovery or criminal action, as appropriate. Factors may include seriousness, intent, impact, recurrence, cooperation, concealment and consistency of treatment. No person is exempt because of title or performance.

21. Governance, interpretation and exceptions

HR owns administration of this Code in consultation with Legal & Compliance and relevant control functions. Business leaders are accountable for implementation. Questions of interpretation should be referred to HR or Legal & Compliance.

No exception may permit unlawful conduct, bribery, retaliation, deliberate misrepresentation or compromise to health and safety. Any other exception must be exceptional, documented, time-bound and approved by the authority designated under Assetz's governance framework.

22. Acknowledgement

Covered Persons may be required periodically to confirm that they have read, understood and will comply with this Code; disclosed relevant conflicts, gifts or concerns; and completed required training. The obligation to comply applies whether or not an acknowledgement has been signed.

23. Consequence management

Assetz maintains a zero-tolerance approach to violations of this Code of Conduct. Compliance with the Code is mandatory for all employees, directors, consultants, contractors, business partners and other persons who represent, act for, or are associated with Assetz, whether directly or indirectly.

Any actual or suspected violation will be reviewed promptly, fairly and confidentially, to the extent reasonably practicable. Appropriate action will be determined based on the nature, severity and frequency of the violation; the individual's role and intent; the impact on Assetz and its stakeholders; and applicable law, employment terms and contractual provisions.

Consequences may include, but are not limited to:

- Counselling or corrective guidance;
- A documented verbal or written warning;
- Suspension or withdrawal of duties, authority or access;
- Recovery of losses, penalties or damages, where legally and contractually permissible;
- Termination of employment, engagement, contract or business relationship; and
- Civil or criminal proceedings, and/or reporting the matter to the appropriate regulatory or law enforcement authorities.

Failure to cooperate with an investigation, concealment of a violation, destruction or falsification of evidence, knowingly making a false allegation, or retaliation against a person who raises a concern in good faith may independently result in disciplinary or other appropriate action. Consequences will be applied consistently and proportionately, following a fair review and in accordance with applicable law and Assetz's established disciplinary procedures. No person's designation, seniority, performance, influence or commercial importance will exempt them from compliance with this Code.

Appendix A - Decision and escalation guide

SITUATION	REQUIRED ACTION	PRIMARY GUIDANCE / ESCALATION
Potential conflict	Disclose promptly; step back from the decision until cleared.	Manager + HR / Legal + Compliance
Gift or hospitality	Check purpose, timing, value and policy threshold; obtain approval/declare before acceptance where required.	Manager + HR / Legal + Compliance
Approval or liaison payment request	Do not pay or promise; record and escalate. If immediate safety is threatened, protect safety and report promptly.	Legal + Compliance + Finance
Misleading sales/marketing claim	Stop publication or commitment; preserve material and escalate for correction.	Sales / Marketing Head + Legal
Title, approval, quality or safety concern	Do not conceal or bypass; preserve records and escalate urgently.	Function Head + Legal / Projects / Investments Team, as Relevant
Data or security incident	Stop further exposure if safe; do not delete evidence; report immediately.	IT / Information Security + Data Privacy Contact
Harassment or sexual harassment	Use HR/ethics route; POSH concerns may be raised with the Internal Committee.	HR / Internal Committee + Compliance
Suspected retaliation	Report separately and promptly.	HR / Legal + Ethics & Compliance

Appendix B – Related policy framework

This Code establishes the common behavioral standard. Detailed processes, thresholds and remedies remain governed by the latest approved versions of the following documents, where issued:

- Anti-Bribery and Corruption / Gifts and Hospitality Policy
- POSH Policy and Internal Committee Procedure
- Whistleblower / Ethics Reporting and Non-Retaliation Policy
- Equal Opportunity and Non-Discrimination Policy
- Information Security, Acceptable Use and Data Privacy Policies
- Health, Safety and Environment policies and Site Procedures
- Procurement, Delegation of Authority and Third-Party Due-Diligence Procedures
- Records Retention, Legal Hold and Document Management Requirements
- Employee Grievance and Disciplinary Procedures

Please note: This appendix is an implementation checklist and not legal advice. The policy has been reviewed by Assetz Legal before adoption.



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