

Date: 8th September, 2024

SRL/SE/45/24-25

National Stock Exchange of India Ltd

Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex, Bandra (East),
Mumbai - 400 051

Symbol: SUNTECK

BSE Limited

Phiroze Jeejeebhoy Tower,
Dalal Street,
Mumbai - 400 001

Scrip Code: 512179

Sub: Business Responsibility and Sustainability Report for the Financial Year 2023-24

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Business Responsibility and Sustainability Report ('BRSR') for the Financial Year 2023-24.

The said BRSR also forms part of the Annual Report for the Financial Year 2023-24 submitted to the Stock Exchanges, where the Company's securities are listed, vide letter dated 8th September, 2024.

This is for your information and records.

Yours sincerely,

For Sunteck Realty Limited

Rachana Hingarajia

Company Secretary

(ACS: 23202)

Encl: a/a

"ANNEXURE - III"

Business Responsibility & Sustainability Reporting (BRSR)

SECTION A: GENERAL DISCLOSURES

1. Details of the listed entity

Corporate Identity Number (CIN) of the Listed Entity	L32100MH1981PLC025346
Name of the Listed Entity	Sunteck Realty Ltd
Year of incorporation	1st October, 1981
Registered office address	5th Floor, Sunteck Centre, 37-40, Subhash Road, Vile Parle (East), Mumbai 400057
Corporate address	5th Floor, Sunteck Centre, 37-40, Subhash Road, Vile Parle (East), Mumbai 400057
E-mail	cosec@sunteckindia.com
Telephone	022-42877800
Website	https://www.sunteckindia.com/
Financial year for which reporting is being done	2023-24
Name of the Stock Exchange(s) where shares are listed	BSE Limited & National Stock Exchange of India Limited
Paid-up Capital	INR 14,64,86,419
Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Rachana Hingaraja 022-42877800 cosec@sunteckindia.com
Reporting boundary	Disclosures are made on a consolidated basis for Sunteck Realty Limited and its subsidiaries.
Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	
Name of assurance provider	Not Applicable
Type of assurance obtained	Not Applicable

2. Products/services

Details of business activities (accounting for 90% of the turnover):

S. no.	Description of main activity	Description of business activity	% of turnover of the entity (FY23)
1	Real Estate development and leasing	Development of Residential and Commercial Projects	100%

3. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

S. No.	Product/Service	NIC Code	% of total turnover contributed
1.	Construction and development of real estate and allied activities	410	100%

4. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of plants	Number of offices	Total
National	0	5	5
International	0	2	2

5. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	3
International (No. of Countries)	2

b. What is the contribution of exports as a percentage of the total turnover of the entity?

The contribution of exports for Sunteck Realty Limited is not applicable.

c. A brief on types of customers

Sunteck Realty Limited customers are residential and corporate clients. For our commercial spaces, we have corporate clients and for our residential spaces, our clients consist of majorly individuals and High Net worth Individual's.

6. Employees

Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	587	421	71.73%	166	28.27%
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total employees (D + E)	587	421	71.73%	166	28.27%
WORKERS						
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	0	0	0	0	0
6.	Total workers (F + G)	0	0	0	0	0

Note: The Company does not employ any workers as defined in the BRSR Guidance Note.

b. Differently abled Employees and workers

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	0	0	0	0	0
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total differently abled employees (D + E)	0	0	0	0	0
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	0	0	0	0	0
5.	Other than permanent (G)	0	0	0	0	0
6.	Total differently abled workers (F + G)	0	0	0	0	0

Note: The Company does not employ any workers as defined in the BRSR Guidance Note.

"ANNEXURE - III" (Contd.)

7. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	7	2	28.57%
Key Management Personnel	1	0	0%

Note: The Company Secretary of the Company is a female as well as a member of the Board of Directors and a Key Managerial Personnel ('KMP'). For representation purpose and for avoidance of duplication, we have not considered her as a KMP.

8. Turnover rate for permanent employees and workers

The Company Secretary of the Company is a female as well as a member of the Board of Directors and a Key Managerial Personnel ('KMP'). For representation purpose and for avoidance of duplication, we have not considered her as a KMP.

	2023-24			2022-23			2021-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	30.7%	10.92%	40.26%	30.64%	10.55%	41.2%	27.8%	11.44%	39.24%
Permanent Workers	0	0	0	0	0	0	0	0	0

9. Holding, Subsidiary and Associate Companies (including joint ventures)

(a) Names of holding / subsidiary / associate companies / joint ventures

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Satguru Infocorp Services Private Limited	Subsidiary	100%	No
2	Sunteck Property Holdings Private Limited	Subsidiary	100%	No
3	Sunteck Realty Holdings Private Limited	Subsidiary	100%	No
4	Starlight Systems Private Limited	Subsidiary	100%	No
5	Sahrish Constructions Private Limited	Subsidiary	100%	Yes
6	Starteck Lifestyle Private Limited	Subsidiary	100%	No
7	Advaith Infraprojects Private Limited	Subsidiary	100%	No
8	Sunteck Real Estates Private Limited	Subsidiary	100%	Yes
9	Sunteck Infraprojects Private Limited	Subsidiary	100%	No

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
10	Skystar Buildcon Private Limited	Subsidiary	100%	Yes
11	Satguru Corporate Services Private Limited	Subsidiary	100%	Yes
12	Shivay Brokers Private Limited	Subsidiary	100%	No
13	Sunteck Lifestyle International Private Limited	Subsidiary	100%	No
14	Sunteck Lifestyle Limited	Subsidiary	100%	No
15	Sunteck Lifestyle Management DMCC	Subsidiary	100%	No
16	Sunteck Lifespace Private Limited	Subsidiary	100%	No
17	Industele Property Private Limited	Subsidiary	100%	No
18	Rammit Corporate Solutions Private Limited	Subsidiary	100%	No
19	Sunteck Infracon Private Limited	Subsidiary	100%	No
20	Sunteck Realtors Private Limited	Subsidiary	100%	No
21	Starlight Systems (I) Private Limited	Subsidiary	100%	No
22	Rusel Multiventures Private Limited	Subsidiary	100%	No
23	Magnate Industries Private Limited	Subsidiary	100%	No
24	Sunteck YM Realty Private Limited	Subsidiary	100%	No
25	Sundunes Real Estates Private Limited	Subsidiary	100%	No
26	Clarissa Facility Management LLP	Subsidiary	100%	No
27	Mithra Buildcon LLP	Subsidiary	100%	No
28	Piramal Sunteck Realty Private Limited	Joint Venture	50%	No
29	Uniworth Realty LLP	Joint Venture	50%	No
30	Nairman Infrastructure LLP	Joint Venture	50%	No
31	GGICO Sunteck Limited	Joint Venture	50%	No

"ANNEXURE - III" (Contd.)

10. CSR Details

(i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) - Yes

(ii) Turnover (in ₹) - ₹ 5,648,468,000/-

(iii) Net worth (in ₹) - ₹ 31,241,967,000/-

11. Transparency and Disclosures Compliances

Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)	2023-24			2022-23			
		(If Yes, then provide web-link for grievance redress policy) *	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes		0	0	Nil	0	0	Nil
Investors (other than shareholders)	Yes		0	0	Nil	0	0	Nil
Shareholders	Yes		0	0	Nil	0	0	Nil
Employees and workers	Yes		0	0	Nil	10	0	Nil
Customers	Yes		434	25	We have 5 cases registered with RERA. The other issues mainly involve disputes over maintenance charges, which will be addressed during the formation of the society. Additionally, there are complaints related to leakage and seepage that are currently being resolved	654	10	Out of 10 escalations, 1 pertains to leakage in ODC and another to possession issues, both of which are in litigation. The remaining 8 escalations are related to parking and in discussion with management
Value Chain Partners	Yes		0	0	Nil	0	0	Nil
Other (please specify)	Yes		0	0	Nil	0	0	Nil

*Web link of the Grievance Redressal Policy: <https://www.sunteckindia.com/grievance-redressal>

12. Overview of the entity's material responsible business conduct issues

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Water Conservation	Opportunity	Water is a critical resource in construction and building maintenance. Water conservation is important as efficient water management ensures sustainable operations, helps to reduce operational costs, ensure business continuity in water-stressed areas, contribute to SDGs, and meet stakeholder expectations.	-	Positive
2	Occupational Health & Safety	Opportunity	As a real estate company, we face various occupational health and safety risks related to their operations. By prioritising occupational health and safety, we strive to protect our employees and contractors while reducing the financial and reputational risks associated with workplace accidents and injuries.	-	Positive. Occupational health and safety mechanisms presents positive financial implications for companies that prioritise health and safety can benefit from increased productivity, reduced man lost days, reduced absenteeism and turnover, and improved reputation.
3	Green Buildings	Risk & Opportunity	Green building certification offers both risks and opportunities. Risk: Achieving certification requires adherence to specific guidelines, standards, and documentation procedures. Meeting these requirements can be challenging and time-consuming, particularly for developers unfamiliar with green building practices.		Positive and Negative

“ANNEXURE - III” (Contd.)

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
			<p>Opportunity 1. Green buildings often demonstrate long-term cost savings through reduced energy consumption, water efficiency, and lower maintenance expenses. Lower operating costs can offset the initial investment, providing financial benefits over the building’s lifespan.</p> <p>2. Green buildings prioritise occupant health and well-being by incorporating features such as improved indoor air quality, natural lighting, and access to green spaces. These factors can positively impact occupants’ productivity, satisfaction, and overall quality of life.</p>		
4	Carbon Footprint	Risk	Monitoring and reducing carbon footprint is essential to comply with environmental regulations, minimise operational costs related to energy consumption, and meet stakeholder expectations.	Conduct product carbon footprint analysis, implement energy-efficient systems, invest in renewable energy sources, and conduct regular carbon audits to track and reduce emissions.	Negative
5	Human Rights	Risk	Ensuring human rights is crucial for protecting the welfare of our workers, and employees. It ensures fair treatment, safe working conditions, and compliance with labor standards, which is essential for maintaining a reliable and ethical workforce.	We strive to conduct human rights due diligence in the subsequent year to identify and address potential human rights impacts within operations and supply chain.	Negative

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6	Employee wellbeing and development	Risk and Opportunity	Real Estate companies often have a high turnover rate for their employees. Employee wellbeing and development is essential metric for our company and a careful balance needs to be maintained when it comes to prioritisation of such KPIs.	Offering resources and support systems to help employees cope with stress, such as stress management workshops, wellness programs, and Employee Assistance Program.	Positive and Negative
7	Sustainable Supply Chain	Risk and Opportunity	Assessing the sustainability of the supply chain is essential to ensure responsible sourcing that all materials meet sustainability criteria, reduce risks related to supply chain disruptions, and comply with environmental and social standards. This will also help us to monitor and track our scope 3 emissions resulting from our supply chain activities.	We strive to conduct sustainable supply chain assessments to ensure that suppliers meet our environmental and social standards and to identify and mitigate potential risks early. Conduct workshops with the suppliers and align on environmental goals with them to track and reduce scope 3 emissions.	Positive and Negative
8	Data privacy & security	Opportunity	Managing data privacy and security is essential for protecting sensitive business and customer information. It ensures compliance with regulations and builds trust with clients, which is critical for business growth. We constantly strive to invest in technologies enhancing our cyber security processes to protect sensitive information, prevent data breaches and build customer trust.	-	Positive

"ANNEXURE - III" (Contd.)

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
9	Business Ethics & Corporate Governance	Opportunity	Sunteck believes managing and prioritising corporate governance can help a real estate company to manage its risk effectively. We see it as an opportunity as implementing strong corporate governance practices can help avoid reputational damage, regulatory penalties and legal issues	-	Positive
10	Climate Change	Risk	Failing to address emissions can lead to several risks for our company especially when emissions are so intense for our sector which being the biggest contributor. We may incur reputational damages, penalties and increased operational costs if emissions are not managed well.	It's our endeavor to mitigate the risk associated with emissions; following are some strategies which we strive to initiate 1. Transition to Clean Energy Sources 2. Improve Energy Efficiency 3. Effective waste management practices	Negative
11	Waste Management	Opportunity	Sunteck prioritises proper waste management as it mitigates environmental impact, complies with regulations, reduces costs, enhances corporate reputation, and meets stakeholder expectations	-	Positive
12	Occupants Satisfaction	Opportunity	Occupant satisfaction is critical to the Company to maintain reputation and increased revenue to ensure successful business as customers are the prime asset for the Company	-	Positive

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
13	Sustainable Sourcing	Opportunity	Sunteck relies on a variety of raw materials for construction and maintenance, including steel, cement, lumber, and plastic. We can work with suppliers to understand their sourcing practices, assess environmental and social risks, and diversify their supply chains.	-	Positive
14	Diversity, Equity & Inclusion	Opportunity	Sunteck constantly strives to have a diverse and inclusive workplace as it helps to serve a diverse customer base. We see it as an opportunity to prioritise and balance DEI at our company to reap varied benefits like improved collaboration, brand reputation etc.	The Company strives to facilitate flexible working arrangements for its employees which will include appropriate work from home opportunities and all weekend holidays among others	Positive

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

S. No.	Principle Description	Reference of the Policies
P1	Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.	<ul style="list-style-type: none"> Code of Conduct Policy, Anti-Bribery and Anti-Corruption Policy, Whistleblower Policy, Related Party Transactions Policy Nomination and Remuneration Policy Fair disclosure code Policy for determination of materiality Board diversity Policy Tax Policy
P2	Businesses should provide goods and services in a manner that is sustainable and safe	<ul style="list-style-type: none"> Environmental Policy Supplier code of conduct Policy Environment Management Manual
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains	<ul style="list-style-type: none"> Human Rights Policy Whistleblower Policy, Freedom of Association and Collective Bargaining Policy

“ANNEXURE - III” (Contd.)

S. No.	Principle Description	Reference of the Policies
P4	Businesses should respect the interests of and be responsive to all its stakeholders	<ul style="list-style-type: none"> Corporate Social Responsibility Policy Stakeholder Engagement Policy Grievance Redressal Policy
P5	Businesses should respect and promote human rights	<ul style="list-style-type: none"> Code of Conduct Policy Human Rights Policy Whistleblower Policy
P6	Businesses should respect and make efforts to protect and restore the environment	<ul style="list-style-type: none"> Whistleblower Policy
P7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent	<ul style="list-style-type: none"> Anti-Bribery and Anti-Corruption Policy Policy on determining materiality. Dividend Distribution Policy Policy for Archiving, Preservation and Disposal of documents
P8	Businesses should promote inclusive growth and equitable development	<ul style="list-style-type: none"> Corporate Social Responsibility Policy
P9	Businesses should engage with and provide value to their consumers in a responsible manner	<ul style="list-style-type: none"> Code of Conduct Stakeholder Engagement Policy Cyber Security Policy

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y*	Y*	Y*	Y*	Y*	Y*	Y*	Y*	Y*
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web Link of the Policies, if available**	https://www.sunteckindia.com/investor-relations#codepolicies								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes								
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes. Select policies like our Anti-Bribery and Anti-Corruption policy, Whistleblower policy, Supplier code of conduct, Grievance Redressal Policy, ESG policy extend to our value chain partners.								
4. Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) mapped to each principle.									
Principle 1	1. LEED								
Principle 2	2. EDGE - IFC								
Principle 3	3. GRESB								
Principle 4	4. ISO 9001:2015								
Principle 5	5. ISO 14001:2015								
Principle 6	6. ISO 45001:2018								
Principle 7									
Principle 8									
Principle 9									

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>Sunteck endeavors to achieve following goals in order to strengthen its ESG journey:</p> <ul style="list-style-type: none"> - >95% Green building certifications for its residential and commercial projects - Conducting Supply chain assessment in the subsequent year - Conducting Biodiversity assessment in the subsequent year - Conducting Human rights due diligence in the subsequent year - Conducting Climate risk assessment for it select few sites. - Undertaking Scope 1 & Scope 2 reduction targets 								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	None								

Governance, leadership and oversight:

7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)

Dear Stakeholders,

I am pleased to share with you Sunteck Realty's latest report, "Sustainable Excellence: Leading the Way in Green Real Estate". As we navigate the dynamic landscape of our industry, we recognise the imperative of innovation and aligning our strategies with sustainable principles. Our goal remains steadfast: to create enduring value, drive growth, empower communities, and safeguard our environment.

Throughout our journey, Sunteck Realty has upheld uncompromising ethical standards. Trust is the bedrock of our achievements, and we are dedicated to earning and preserving the trust of all our stakeholders. Our emphasis on governance, financial discipline, and transparent communication has propelled us to become one of the leading force in Mumbai's luxury real estate market.

In the fiscal year 2023-24, we reached significant milestones in sustainability. One of our properties Sunteck WestWorld have earned prestigious EDGE green building certification from IFC, a member of the World Bank Group, affirming our endeavor to create environmentally responsible spaces that minimise ecological impact while enhancing living standards.

I am happy to share that we have tied up with International Finance Corporation (IFC), a member of World Bank group, to create a joint platform with a total investment up to ₹ 750 Crores by IFC and Sunteck. This platform will focus on building high quality, large scale green housing projects targeting the mid-income demographics. This equity partnership is a testament to our strong systems and processes, scalable business model and focus on environment sustainability.

Talking about sustainability, also pleased to share that Sunteck Realty has received 5-star rating and has been ranked third in Asia-Pacific Diversified Office and Residential Peer comparison by Global Real Estate Sustainability Benchmark (GRESB).

Looking ahead, we are energised by the possibilities to lead in sustainable real estate practices. Our vision imagines a future where buildings harmonise seamlessly with their natural surroundings and communities thrive in sustainable environments. We are dedicated to pushing boundaries and setting new benchmarks in sustainable development, fulfilling our responsibility as industry leaders to create a brighter future for generations to come.

**Warm regards,
Kamal Khetan
Chairman and Managing Director**

“ANNEXURE - III” (Contd.)

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy/policies	The implementation of business responsibility policies is the responsibility of both the compliance team and the ESG (Environmental, Social, and Governance) committee. The oversight for these efforts is provided by the Chairman and Managing Director.								
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Sunteck has constituted the ESG Committee to oversee key activities within the Company and ensure effective implementation of sustainable objectives. The responsibilities of the Committee include the development and assessment of ESG goals and Policies, development of investor communication, driving progress on key performance indicators, and evaluation of the same on a regular basis. The Committee ensures to communicate the critical concerns to the Chairman and Managing Director who is the primary decision maker for sustainability related performance.								

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Performance against above mentioned policies and follow up action is reviewed by the Board of Directors, Nomination and Remuneration Committee, Audit Committee, Corporate Governance Committee as applicable. The periodicity of these reviews is once every year or whenever an update is required due to change in applicable laws.									Annually								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	No non-compliances have been observed during the reporting period.																	

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Internal assessment was carried out by reviewing the policies on a periodic basis and evaluate working of the same and assess the adequacy and effectiveness in terms of best practices followed by other organisations of repute. For FY 2023-24, no external agency has undertaken an assessment/evaluation.								

12. If answer to question (1) above is “No” i.e. not all Principles are covered by a policy, reasons to be stated:

Not Applicable

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorised as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally, and ethically responsible.

Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

Essential Indicators

1. Percentage coverage by training and awareness programmes on any of the principles during the financial year:

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	1	ESG training conducted for the board provided them a comprehensive framework to understand all the components covered under the nine principles of the BRSR framework	100%
Key Managerial Personnel	1		100%
Employees other than BoD and KMPs	4	1. ESG Training 2. Health & Safety Training 3. Human rights 4. POSH	100%
Workers		NA	

Note: The Company does not employ any workers as defined in the BRSR Guidance Note.

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

Monetary					
	NGRBC Principle	Name of the regulatory/ Enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	NA	0	0	0	0
Settlement	NA	0	0	0	0
Compounding fee	NA	0	0	0	0

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Non-Monetary				
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	NA	0	0	0
Punishment	NA	0	0	0

3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.

Not Applicable

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

The Company endeavors to maintain the highest standards of corporate governance and ethical business conduct. Focused efforts are undertaken to ensure that all disclosure requirements are met adequately. In line with this, an Anti-Bribery and Anti-Corruption Policy aligned with International Finance Corporation (IFC) has been formalised that supports the creation of value for all stakeholders in a fair and transparent manner with integrity and accountability.

The Policy provides a framework for compliance with all relevant standards of anti-bribery and anti-corruption. The Company, its subsidiaries, associates, and any person/entities over which company has management control are mandated to comply with the policy. Further details can be found at: <https://www.sunteckindia.com/investor-relations#codepolicies>

5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption.

	2023-24	2022-23
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

6. Details of complaints with regard to conflict of interest:

	2023-24		2022-23	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	Nil	0	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	Nil	0	Nil

7. Provide details of any corrective action taken or underway on issues related to fines / penalties /action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.

Not Applicable

8. Number of days of accounts payables ((Accounts payable *365) / Cost of goods/services procured) in the following format :

	2023-24	2022-23
Number of days of accounts payables	277	347

9. Open-ness of business

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

Parameter	Metrics	2023-24	2022-23
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	NIL	NIL
	b. Number of trading houses where purchases are made from	NIL	NIL
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	NIL	NIL
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	0	0
	b. Number of dealers / distributors to whom sales are made	0	0
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	0	0
Related party transactions	a. Purchases (Purchases with related parties / Total Purchases)	NIL	NIL
	b. Sales (Sales to related parties / Total Sales)	NIL	NIL
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	27.49%	31.75%
	d. Investments (Investments in related parties / Total Investments made)	98.94%	95.86%

“ANNEXURE - III” (Contd.)

Leadership Indicators

1. Awareness programmes conducted for value chain partners on any of the principles during the financial year:

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
1	<p>The Company undertook ESG training session for its value chain partners highlighting the importance of integrating ESG practices into the business. The session served as a platform to inform and educate our valued partners about the best practices that align with our environmental, social, and governance objectives. We discussed various environmental aspects, including energy efficiency, waste management, carbon footprint reduction, and sustainable sourcing. We also shared insights on sustainable construction practices, green building certifications, and renewable energy adoption, aiming to inspire sustainable practices across the supply chain.</p> <p>The session covered all the principles on NGRBC principles for our value chain partners as they are required to comply with the Code of Conduct, Human Rights policy, Anti-bribery and Anti-Corruption policy, Supplier Code of Conduct during the engagement with the Company</p>	30%

2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same.

The Company has a Code of Conduct for the Board and all the employees, and includes areas of ethics, integrity, and honesty, which provides guidelines and processes on addressing unethical behavior. The Code also details the processes in place to manage conflicts of interest involving board members, contributing to a culture of transparency and accountability. Our Board members diligently ensure the absence of conflicts of interest with their other positions within the Company by transparently disclosing their affiliations and investments on an annual basis to avoid any conflict of interests. All directors and KMP’s are required to disclose any matters of conflict to the Company on an annual basis. Further details may be found at: <https://www.sunteckindia.com/investor-relations#codepolicies>

Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe.

Essential Indicators

- 1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.**

	2023-24	2022-23	Details of improvements in environmental and social impacts
R&D	0%	0%	NA
Capex	1%	1%	The Company has not made any expenditure on research and development for FY 2023-24. However, in an effort to promote green living among its development portfolio, the Company has made efforts to install solar water heaters and STP's in its residential buildings accounting to 1%. Additionally, as a sustainable conscious company, Sunteck has also invested in significant use of sustainable products in our developments to ensure operational efficiency in the form of utilising recycled steel, fly ash, AAC blocks, top rated energy saving equipment's, solar water heaters, sewage treatment plants, etc.

- 2. Does the entity have procedures in place for sustainable sourcing? (Yes/No) b. If yes, what percentage of inputs were sourced sustainably?**

By educating and motivating our suppliers to adopt sustainability initiatives and encouraging them to disclose their sustainability performance, we track, monitor, and implement initiatives to improve the sustainability throughout our supply chain. The Company has a Supplier code of conduct and Materials Policy which outlines the expectations of working with suppliers in terms of various ESG concerns. ESG clauses are also incorporated in the Company's agreements with major suppliers/contractors engaged with Sunteck. The Company makes every effort to source product locally within a defined boundary from its project site. Local product sourcing enables the Company to cut down on the emissions and energy use involved in transporting and storing such goods. Moreover, it fosters the facilitation and creation of additional business and job opportunities for local vendors and suppliers, thereby generating a positive impact on the local economy. 100% of our inputs were sourced from suppliers who are covered by Sunteck's supplier code of conduct.

Also, during 2023-24, we locally procured 90% of the materials for our development portfolio with overall 74% recycled content materials. To further strengthen our supply chain, we strive to conduct sustainable supply chain assessment in the following year to demonstrate greater environmental stewardship and social responsibility.

- 3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.**

Not applicable, as Sunteck Realty Limited is a service-based real estate entity and does not reclaim products.

- 4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same**

Not applicable

Leadership Indicators

- 1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?**

The Company has not conducted Life Cycle Perspective/ Assessments (LCA) for any of its services in FY 2023-24.

"ANNEXURE - III" (Contd.)

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

Not Applicable

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Indicate input material	Recycled or re-used input material to total material	
	2023-24	2022-23
AAC Blocks	35%	35%
Cement PPC	25%	25%
Cement PSC	25%	25%
RMC	5%	5%
Steel TMT	25%	25%
Structural Steel	25%	25%

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed of.

Not applicable

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

Sunteck doesn't reclaim products hence Not Applicable

Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains

Essential Indicators

- 1 a. Details of measures for the well-being of employees.

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number	% (C/A)	Number (D)	% (D/A)	Number	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	421	421	100%	421	100%	0	0	421	100%	0	0
Female	166	166	100%	166	100%	166	100%	0	0	0	0
Total	587	587	100%	587	100%	166	28.27%	421	71.72%	0	0
Other than Permanent employees											
Male	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0

- b. Details of measures for the well-being of workers: NA

Note: The Company does not have any workers as defined in the BRSR Guidance Note. As a normal business practice, the Company does not employ/hire workers directly for its construction and related activities for their projects. The identified contractors have the obligations in respect of the workers in consideration.

"ANNEXURE - III" (Contd.)

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format -

	2023-24	2022-23
Cost incurred on well- being measures as a % of total revenue of the Company	0	0

Note: All activities/programs facilitated by the Company are undertaken by trained in house personnel itself and hence there is no associated cost towards wellbeing of employees

2. Details of retirement benefits.

Benefits	2023-24			2022-23		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority. (Y/N/N.A.)	No. of employees covered as a % of total employee	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	84.84%	0	Yes	87.87%	0	Yes
Gratuity	100%	0	NIL	100%	0	NIL
ESI	0	0	NIL	0	0	NIL
Others - please specify	0	0	NIL	0	0	NIL

Note: The Company does not have any workers as defined in the BRSR Guidance Note.

3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

No

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy. Yes - Code of Conduct on website

Equal opportunity has been enshrined within the Sunteck's Human Rights Policy. The Company endeavors to providing equal opportunities of employment and non-discrimination in all processes including, but not limited to, recruiting, hiring, termination and promotion. Employment practices at Sunteck are contingent solely on the merit of an individual, irrespective of race, color, religion, creed, caste, economic or social status, gender, nationality, citizenship, age, sexual orientation, physical disability, childbirth, marital status, medical condition, language, sexual orientation, or any other characteristic. Our determination extends to any other protected classes which may exist under applicable law. Strict opposition is maintained to any form of discrimination, direct or indirect. Further details within human rights policy can be found at : <https://www.sunteckindia.com/investor-relations>

5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	100%	0	0
Female	100%	70%	0	0
Total	100%	88.88%	0	0

Note: The Company does not have any workers as defined in the BRSR Guidance Note.

"ANNEXURE - III" (Contd.)

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and workers? If yes, give details of the mechanism in brief.

	(If Yes, then give details of the mechanism in brief)
Permanent Workers	Not Applicable
Other than Permanent Workers	Not Applicable
Permanent Employees	Yes, the Company has formalised a Grievance Policy that forms the backbone of a robust, transparent, and fair redressal system that is easily accessible to all employees. The Policy clearly lays out the process to be followed for an employee to raise a grievance and identify the appropriate personnel for redressal. At each stage of the redressal process, maintaining confidentiality and protecting the identity of the aggrieved employee is a critical priority. Further details can be found at: https://www.sunteckindia.com/investor-relations#codepolicies
Other than Permanent Employees	Not Applicable

7. Membership of employees and worker in association(s) or Unions recognised by the listed entity:

Category	2023-24			2022-23		
	Total employees /workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	0	0	0	0	0	0
- Male	0	0	0	0	0	0
- Female	0	0	0	0	0	0
Total Permanent Workers	0	0	0	0	0	0
- Male	0	0	0	0	0	0
- Female	0	0	0	0	0	0

There are no employee associations recognised by the Company.

8. Details of training given to employees and workers :

Category	2023-24					2022-23				
	Total (A)	On Health and safety measures		On Skill up gradation		Total (D)	On Health and safety measures		On Skill up gradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	427	427	100%	427	100%	359	359	100%	359	100%
Female	166	166	100%	166	100%	152	152	100%	152	100%
Total	587	587	100%	587	100%	511	511	100%	511	100%
Workers										
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Note: The Company does not have any workers as defined in the BRSR Guidance Note.

9. Details of performance and career development reviews of employees and worker:

Category	2023-24			2022-23		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	421	256	60.81%	359	214	59.61%
Female	166	100	60.24%	152	92	60.53%
Total	587	356	60.65%	511	306	59.88%
Workers						
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Total	0	0	0	0	0	0

Note: The Company does not have any workers as defined in the BRSR Guidance Note. Also, the 39.35 % of employees didn't receive any career development rewards as they either were not eligible due to being on probation or they joined the Company in that FY, hence weren't eligible under Sunteck's performance appraisal cycle.

10. Health and safety management system:

a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, what is the coverage of such a system?

Yes, apart from being fully compliant to ISO 14001:2015 Environmental Management System and ISO 9001:2015 Quality Management System, Sunteck Realty Limited is also compliant to ISO 45001:2018 Occupational Health and Safety Assessment System as well and impose a stringent safety measure with specific procedural guidelines stipulated by our Supplier and Contractors requirements to prevent accidents, reputational and environmental risks. The whole company's portfolio is ISO/IMS certified for quality management (ISO 9001:2015), environmental management (ISO 14001:2015), and occupational health and safety management (ISO 45001:2018). The Company has a well-defined Occupational Health and Safety Management System which includes, OHS Manual and supporting processes to ensure the safety and well-being of its employees and worker.

"ANNEXURE - III" (Contd.)

The Company endeavours to ensure workplace safety and maintaining a healthy environment for all employees. The site teams are trained on safety parameters to ensure that they are familiar with best practices. Initiatives at the sites include induction trainings, mock drills, firefighting training, safety week celebration, and health and medical check-ups, amongst others.

In line with this, the Company has formalised a Health and Safety Policy that is applicable to all employees. This policy is a clear demonstration of the management's determination of its employee's health and safety, and to establish the linkages between employee safety and optimum business performance. It clearly outlines the responsibilities of the employer and employee to ensure occupational health and safety and provides details on preventive measures. The policy covers work related hazards, infection control practices, medical examination, staff education on health and safety, radiation safety and health care privileges. Link - [https:// www.sunteckindia.com/investor-relations#codepolicies](https://www.sunteckindia.com/investor-relations#codepolicies)

b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

Safety is the foundation for all our operations, and includes all aspects, people safety, environmental safety, process safety, chemical safety, transportation safety and asset integrity. With competent employees and contractors, we take effective measures to eliminate hazards, reduce risks and prevent incidents. Sunteck Realty Limited ensures to set up a Hazard Identification and Risk Assessment (HIRA) team which is constituted at each site. A comprehensive plan has been developed to assist the project team in developing the project-specific Hazard Identification, Risk, and Opportunity Assessment as a proactive control measure. Routine inspections are carried out to identify any variation in processes or operations and covers inspection of various measures such as facility safety, occupational safety, chemical safety, fire safety, equipment safety etc.

c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks.

Yes, the Company has an OHS management process where workers when faced with any inconvenience are encouraged to report OHS risks with the site team and safety manager. At each site, safety officers maintaining an incident reporting system, while safety managers ensure that all observations are thoroughly addressed through appropriate corrective actions and preventive measures. Moreover, we have installed suggestion box at all sites where they are encouraged to give suggestion, work related complaints in their local language. The same is reviewed by site safety team on weekly basis.

d. Do the employees/ workers of the entity have access to non-occupational medical and healthcare services?

Yes, the realm of employee well-being has transcended beyond physical health, expanding to encompass a holistic work culture that prioritises mental and emotional well-being. All employees of the Company have access to non-occupational medical and healthcare services which is facilitated by a holistic provision of sessions and programs like Stress management sessions, Ergonomics session, Health checkup camps, Women's wellness sessions etc. The Company also provides parental and maternity leave benefits to both male and female employees of the Company including health insurance and Group Accidental Policy (GAP).

For workers, the facets of Occupational Health and Employee Welfare form the cornerstone of our operations to safeguard worker wellbeing and foster a secure workspace. In pursuit of this objective, Sunteck has meticulously curated a comprehensive suite of provisions encompassing physical wellness initiatives such as Medical Health Camp conducted for all workers including twice a week consultation and medication if required free of cost. We organised a healthcare screening for our construction workers as part of the Sunteck Saathi initiative, in collaboration with the Doctors for You Foundation and Samhita. A total of 1,042 workers benefited from this camp, where they were screened for various health conditions, including diabetes, blood glucose levels, hypertension, and refractive errors in their eyes. Free medicines were also provided to those in need.

11. Details of safety related incidents, in the following format:

Safety Incident/Number	Category	2023-24	2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one Million-person hours worked)	Employees	0	0
	Workers	0.34	2.411
Total recordable work-related Injuries	Employees	0	0
	Workers	2	10
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	1	0

12. Describe the measures taken by the entity to ensure a safe and healthy workplace.

The Company recognises that overall physical and mental wellbeing of its employees is integral to its success and growth aspirations. Sunteck strives to ensure that employees at both the workplace and development sites have access to the requisite health and safety services for their continuous well-being. Our offices are thoughtfully designed in a way where health and well-being of our employees are given utmost importance. Different design elements are incorporated to ensure that the buildings offer a conducive work environment with 'thermal', 'visual' and 'ergonomic' comfort. These elements help minimise stress or discomfort due to loud sounds, insufficient light or excessive glare, or thermal stress in order to create ergonomically friendly spaces. We are also bringing in 'biophilic design' elements to help our employees get closer to nature and to promote social interaction, thereby improving the emotional well-being of employees. A health and safety training was also conducted at Head office and site offices for all of Sunteck's employees.

13. Number of complaints on the following made by employees and workers

	2023-24			2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	Nil	0	0	Nil
Health & Safety	0	0	Nil	0	0	Nil

14. Assessments for the year

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100%
Working Conditions	100%

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

Starting from 2023-24, the core ISO team has implemented a rigorous monthly safety & environment audit for all ongoing sites. This assessment is conducted using a comprehensive safety checklist to ensure high standards of safety across all operations. A minimum internal benchmarking has been established as the threshold for compliance, all sites have successfully met or exceeded this passing threshold, demonstrating a strong commitment to maintaining safe working environments.

“ANNEXURE - III” (Contd.)

Additionally, as part of our endeavor to safety and sustainable construction practices, Sunteck Realty Ltd. has initiated the removal of bamboo scaffolding from all ongoing construction projects. Recognising the safety risks and limitations associated with traditional bamboo scaffolding, we are transitioning to more secure and reliable alternatives. This proactive measure not only enhances the safety of our construction sites but also aligns with our broader strategy to adopt modern, sustainable building practices.

By implementing advanced scaffolding systems, we can provide a safer working environment for our construction teams, reduce the likelihood of accidents, and improve overall project efficiency. This initiative reflects our dedication to safeguarding our workforce and upholding the highest standards of safety and sustainability in every aspect of our operations. This year, we have taken a significant step by deploying paramedic staff at our Naigaon and Vasai construction sites. This proactive safety initiative is designed to provide immediate medical assistance and ensure prompt response to any health emergencies that may arise on-site.

The presence of trained paramedics not only enhances the overall safety and well-being of our workers but also helps in creating a secure working environment. By prioritising the health and safety of our employees, we continue to foster a culture of care and responsibility, reflecting our core values of sustainable and responsible development.

Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

Sunteck doesn't have any such provisions in place for its employees and workers. However, the Company has provision of Group Accidental Policy to provide a protective financial shield for its employees against unforeseen circumstances resulting from accidents. It ensures peace of mind by covering accidental death, permanent total disability, and partial disability.

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

Agreements and contracts formalised with value chain partners of the Company ensures their responsibility to ensure deduction and deposit of statutory dues. Contractors are mandated to provide evidence of ongoing compliance with statutory obligations by submitting valid registrations for Provident Fund (PF) and Employee State Insurance Corporation (ESIC), along with copies workmen compensation policies, as statutory requirement.

3. Provide the number of employees / workers having suffered high consequence work related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	2023-24	2022-23	2023-24	2022-23
Employees	0	0	0	0
Workers	0	0	0	0

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

The Company does not provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety conditions	For the 2023-24, no specific assessments have been carried out for the value chain partners. However, the Company has outlined the highest standards of health, safety, and working conditions in its Code of Conduct. The Company actively promotes and encourages its value chain partners to prioritise and uphold health and safety practices, as well as maintain proper working conditions.
Working conditions	

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

As there have not been any assessments done for the 2023-24, no corrective action plans have been developed to address significant risks / concerns.

Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders.

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.

The Company has mapped its internal and external stakeholders. Stakeholders are determined, recognised, and categorised by Sunteck while considering their relationship to each business unit. This is done to examine the risks and repercussions, direct or indirect, incurred to each group of stakeholders fully and explicitly bearing in mind that each group has its own set of viewpoints and expectations. As such six major stakeholder groups that are essential to the Company's operations have been identified.

2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	<ul style="list-style-type: none"> One-on-one interactions Customer meets Customer relationship portal -Life@Sunteck Customer helpline Media Website Periodic structured feedback meetings 	<ul style="list-style-type: none"> Ongoing Need based 	<ul style="list-style-type: none"> Customer experience and service quality Product features and benefits Timely delivery Grievance redressal

"ANNEXURE - III" (Contd.)

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Vendors / Suppliers	No	<ul style="list-style-type: none"> Meetings Emails Letters 	<ul style="list-style-type: none"> Ongoing Need based 	<ul style="list-style-type: none"> Product and service quality and support Contract support on commercial and technical T&C Compliance with Supplier Code of Conduct Suppliers' statutory compliances
Employees	No	<ul style="list-style-type: none"> Induction programme Emails Leadership meetings Employee engagement initiatives Rewards and recognition programmes Employee portal HR helpdesk Employee volunteering initiatives 	<ul style="list-style-type: none"> Ongoing Need based 	<ul style="list-style-type: none"> Policies and procedures Performance appraisal and rewards Training and career development Work environment Health and wellness Safety and security Community development Employee volunteering
Contractors	No	<ul style="list-style-type: none"> Periodic reviews Meetings One-on-one interactions 	<ul style="list-style-type: none"> Need based 	<ul style="list-style-type: none"> Pricing and payment terms Delivery terms
Bankers	No	<ul style="list-style-type: none"> Meetings Letters Emails 	<ul style="list-style-type: none"> Need based 	<ul style="list-style-type: none"> Cash flow Financial Products and services

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
NGOs	No	<ul style="list-style-type: none"> Community development initiatives, including need-based local interventions. Funding support Proposals and requests for new initiatives 	<ul style="list-style-type: none"> Ongoing Need based 	<ul style="list-style-type: none"> Community needs, including aid for relief and rehabilitation aid requirements. Social infrastructure development Human and organisational support
Investors	No	<ul style="list-style-type: none"> Earnings calls Annual & Interim results announcement 	<ul style="list-style-type: none"> Ongoing Need based 	<ul style="list-style-type: none"> Management of investors' expectations Management of reputational risks

Leadership Indicators

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

The management regularly interacts with key stakeholders. There are various mechanisms employed for analyzing, planning, and implementing various tasks to engage stakeholders. It enables the translation of stakeholder needs into organisational goals and creates the basis of effective strategy development. Also, the Company's specific departments become the liaison between the stakeholders and the board in order for the stakeholders to communicate anything material.

2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes, the Company has conducted a materiality assessment for 2023-24 with its key identified stakeholders such as customers, employees, vendors & suppliers, contractors, investors, banks and NGO's.

Materiality assessment is of paramount importance to Sunteck's sustainability strategy, guiding the prioritisation of our key focus areas. Beyond addressing external expectations, it serves as a strategic initiative to enhance our sustainability blueprint. In FY24, we conducted our latest materiality assessment using a comprehensive four-step approach, which culminated in identifying a final set of material topics. Regular engagement with various stakeholders ensures that expectations are identified in a timely manner and are addressed responsibly.

3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalised stakeholder groups.

Our in-house CSR team actively engages with local communities to gain a deep understanding of their challenges. Under Sunteck saathi program, we have conducted various initiatives as follows:

"ANNEXURE - III" (Contd.)

Initiative I: Project Lajja - Sunteck collaborated for this initiative with "Making the Difference" charitable trust to confront the taboo surrounding menstruation and empowering girls. Project Lajja represents our concerted effort to change this reality. The impact it has had on the lives of these women and girls is difficult to articulate. A total of 14 sessions conducted to empower 1,000 adolescent girls across three locations in 14 different schools. The campaign was conducted in schools where primary target group for the program was young girls, with a specific focus on creating a supportive environment conducive to addressing their menstrual health needs.

Initiative II: KHUSHIYON KA BOX - DONATION DRIVE for underprivileged peoples- To spread joy and bring smiles to underprivileged and needy individuals by collecting and distributing essential items such as clothes, toys, and books. Significant participation and support from Sunteck Realty employees. Demonstrated collective effort and spirit of generosity within the organisation.

Initiative III: BLOOD DONATION CAMP AT SUNTECK CENTRE: - Sunteck, in collaboration with Making the Difference NGO and Pallavi Blood Center, successfully conducted a blood donation camp at Sunteck Centre on December 21, 2023. This initiative aimed to provide vital support to 108 children battling Thalassemia, each requiring 2 units of blood monthly. Additionally, the event aspires to make a positive impact on countless others in need within our community

Initiative IV: CLEAN SHORES MUMBAI - SURUCHI BEACH: In pursuit of our adherence to environmental stewardship, Sunteck actively organised beach cleaning activities along with Sahyadri school children at Suruchi Beach, Vasai West. One of the initiatives proved to be a remarkable one, as the Company was able to install 4 Benches (made from recycled products) at Suruchi Beach from waste collected from sequential beach cleaning activities.

Principle 5: Businesses should respect and promote human rights**Essential Indicators****1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:**

Category	2023-24			2022-23		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
Employees						
Permanent	587	420	71.55%	0	0	0
Other than permanent	0	0	0	0	0	0
Total employees	587	420	71.55%	0	0	0
Workers						
Permanent	0	0	0	0	0	0
Other than permanent	0	0	0	0	0	0
Total workers	0	0	0	0	0	0

Note: The Company does not have any workers as defined in the BRSR Guidance Note.

2. Details of minimum wages paid to employees and workers, in the following format

Category	2023-24					FY 2022-23				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	587	0	0	587	100%	511	0	0	511	100%
Other than permanent	0	0	0	0	0	22	0	0	22	100%

Category	2023-24					FY 2022-23				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Total employees	587	0	0	587	100%	533	0	0	533	100%
Workers										
Permanent	0	0	0	0	0	0	0	0	0	0
Other than permanent	0	0	0	0	0	0	0	0	0	0
Total workers	0	0	0	0	0	0	0	0	0	0

3. a. Details of remuneration/salary/wages, in the following format:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	5	21,397,914	2	7,468,752
Key Managerial Personnel	1	15,900,000	0	0
Employees other than BoD and KMP	419	885,000	165	798,996
Workers	Not Applicable			

Note: The Board of Directors consists of four independent directors which are paid sitting fees. Hence, the figures for BOD have been provided accordingly. CFO (male) is designated as KMP in the above table.

b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

	2023-24	2022-23
Gross wages paid to females as % of total wages	24.20%	27.18

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes, the Company has adopted a Grievance Redressal Policy to develop and maintain an effective, timely, fair, and equitable grievance handling system which is easily available and offered to all Sunteck's employees. A Code of Conduct that outlines the norms, employee responsibilities and acceptable employee conduct has also been formalised and compliance with the same is mandatory for all employees. Human resource team is responsible for human rights impacts and issues arising within the Company. There is zero tolerance for sexual harassment at workplace. A specific committee constituted in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 to handle any complaints or concerns with respect to sexual harassment has also been established.

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

The Company has a Grievance Redressal Policy and mechanism that provides details on the processes and procedures to be followed to redress all employee grievances. The redressal mechanism has been designed to protect the confidentiality of aggrieved employees and provide redress in a timely and effective manner. Further details may be found at: <https://www.sunteckindia.com/investor-relations#codepolicies>.

"ANNEXURE - III" (Contd.)

6. Number of Complaints on the following made by employees and workers:

	2023-24			2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	Nil	0	0	Nil
Discrimination at workplace	0	0	Nil	0	0	Nil
Child Labour	0	0	Nil	0	0	Nil
Forced Labour/ Involuntary Labour	0	0	Nil	0	0	Nil
Wages	0	0	Nil	0	0	Nil
Other human rights related issues	0	0	Nil	0	0	Nil

7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

	2023-24	2022-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

The Company endeavors to prohibit discrimination, retaliation, or harassment of any kind against any employee who reports under the Vigil Mechanism or participates in the investigation.

9. Do human rights requirements form part of your business agreements and contracts? (Yes/No)

Yes, the Company has specific clauses as part of the Code of Conduct included in the business agreements and contracts / purchase orders. Human Rights also form a part of the Supplier code of conduct and the part of agreements carried with any third-party entities like Contractors. This comprehensive code covers guidelines for conduct across human rights, ethics and business, anti-bribery and anti-corruption practices.

10. Assessments of the year

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labor	0
Forced/involuntary labour	0
Sexual harassment	0
Discrimination at workplace	0
Wages	0
Others - please specify	0

Upholding of Human Rights is critical to the Company's business. Strict internal vigilance is maintained to ensure prevention of discrimination and conduct our operations in a fair and transparent manner, aligned with national and international standards of Human Rights.

11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.

Our Code of Conduct, reflecting the Company's values and policies, is firmly designed to uphold human rights throughout our operations. Among the many policies established to protect employee interests, we have implemented a whistleblower mechanism, providing a safe and anonymous avenue for employees to voice their concerns. To ensure our workforce is aware of and aligned with our values, we conduct regular training on human rights and the prevention of sexual harassment (POSH). For FY24, 100% of our workforce is trained on POSH and approximately 72% is trained on Human rights.

For FY24, all our operations were assessed for Human Rights violations and no significant concerns were reported. Also, we have recorded zero (0) cases of child labor and/or forced labor and/or involuntary labor, and/or discriminatory violations. Our operations do not impact indigenous people or their habitats. During the hiring process, security personnel are informed about safe practices to avoid manhandling and other relevant Human Rights aspects.

Leadership Indicators

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.

The Company undertakes a regular review of its policies and business processes and updates are made as applicable, in line with regulatory changes or internal requirements. There have been no human rights grievances/complaints resulting in introduction/ modification of business process.

2. Details of the scope and coverage of any Human rights due diligence conducted.

Addressing human rights issues is not only a moral obligation but also essential for promoting equality, justice, peace, sustainable development, democracy, and resilience. We strive to conduct human rights due diligence in the subsequent year to identify and address potential human rights impacts within operations and supply chain.

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

No, our premises and offices are not accessible to differently abled visitors.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	0
Discrimination at workplace	0
Child labour	0
Forced/involuntary labour	0
Wages	0
Others - please specify	0

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.

Not Applicable

"ANNEXURE - III" (Contd.)

Principle 6: Businesses should respect and make efforts to protect and restore the environment.

Essential Indicators

1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format :

Parameter	Unit	2023-24	2022-23
From renewable sources (in gigajoules)			
Total electricity consumption (A)	GJ	-	-
Total fuel consumption (B)	GJ	-	-
Energy consumption through other sources (C)	GJ	-	-
Total energy consumption from renewable sources (A+B+C) (GJ)	GJ	-	-
From non - renewable sources (in gigajoules)			
Total electricity consumption (D)	GJ	8,352.3	6,200.35
Total fuel consumption (E)	GJ	852.78	430.19
Energy consumption through other sources (F)	GJ	-	-
Total energy consumption from non - renewable sources (D+E+F) (GJ)	GJ	9,205.08	6,630.54
Total energy consumption (A+B+C+D+E+F) (GJ)	GJ	9,205.08	6,630.54
Energy intensity per rupee of turnover (Total energy consumption in GJ/ turnover in rupees in Crores)	GJ/turnover in crores	16.29	18.29
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	GJ/ Revenue from operations adjusted for PPP	0.72	0.81
Energy intensity in terms of physical output	-	-	-
Energy intensity (optional) - the relevant metric may be selected by the entity	-	-	-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Sunteck recognises the importance of monitoring and recording the environmental impacts of the Company's operations. However, no independent assessment/ assurance is carried out by external agencies.

2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

No, Sunteck has not registered under PAT scheme of government of India.

3. Provide details of the following disclosures related to water, in the following format :

Parameter	2023-24	2022-23
Water withdrawal by source (in kiloliters)		
(i) Surface water	-	-
(ii) Groundwater	570	3445

Parameter	2023-24	2022-23
(iii) Third party water	60,298.32	52,070
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (In kilolitres) (i + ii + iii + iv + v)	60,298.32	55,515
Total volume of water consumption (In kilolitres)	60,868.32	55,515
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	107.76	98.28
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	4.81	4.38
Water intensity in terms of physical output	-	-
Water intensity (optional) - the relevant metric may be selected by the entity	-	-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Sunteck recognises the importance of monitoring and recording the environmental impacts of the Company's operations. However, no independent assessment/ assurance is carried out by external agencies.

4. Provide the following details related to water discharged:

We are in the process of developing relevant infrastructure to evaluate our water discharge data. However, the data related to waste discharge is insignificant for Sunteck considering majority of water is utilised in construction activities.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Sunteck recognises the importance of monitoring and recording the environmental impacts of the Company's operations. However, no independent assessment/ assurance is carried out by external agencies.

5. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

No, the entity has not implemented a mechanism for Zero Liquid Discharge.

6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

Parameter	Please specify unit	2023-24	2022-23
NOx	µg/m ³	25.39	-
SOx	µg/m ³	16.17	-
Particulate matter (PM10)	µg/m ³	75.84	-
Particulate matter (PM2.5)	µg/m ³	37.26	-
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others - Ozone Depleting Substances (HCFC - 22 or R-22)	-	-	-

"ANNEXURE - III" (Contd.)

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Sunteck recognises the importance of monitoring and recording the environmental impacts of the Company's operations. However, no independent assessment/ assurance is carried out by external agencies.

7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

Parameter	Unit	2023-24	2022-23
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	63.4	31.98
Total Scope 2 emissions (Break-up of the GHG into CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, if available)	Metric tonnes of CO ₂ equivalent	1,909.43	1,395.08
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO ₂ equivalent	3.49	3.85
Total Scope 1 and Scope 2 emission intensity (optional) - the relevant metric may be selected by the entity	-	-	-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Sunteck recognises the importance of monitoring and recording the environmental impacts of the Company's operations. However, no independent assessment/ assurance is carried out by external agencies.

8. Does the entity have any project related to reducing GreenHouse Gas emission? If Yes, then provide details.

Aligned with the Company's pledge to save energy, we are transitioning our lighting systems from conventional fixtures with LED lights across our projects and offices. Sunteck Realty aim is to achieve greater efficiency in its management of Energy As part of our sustainability initiatives, we have aligned ourselves with the EDGE-IFC green building certification program. Right from the initial stages of concept inception, we prioritise incorporating the most effective and feasible green building measures into our designs. Some notable examples include optimising the Window-to-Wall Ratio, utilising High Solar Reflectance Index (SRI) Roofing, implementing Solar Water Heating Systems at residential projects, employing energy-efficient lighting solutions, and incorporating demand-controlled ventilation systems for parking areas. These measures collectively contribute to our overarching goal of sustainable and environmentally friendly construction practices.

9. Provide details related to waste management by the entity, in the following format :

Parameter	2023-24	2022-23
Total Waste generated (in metric tonnes)		
Plastic waste (A)	0	0
E-waste (B)	0	0
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	26,624.49	16,281.77
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	0	0

Parameter	2023-24	2022-23
Other Non-hazardous waste generated (H) . Please specify, if any.	0	0
Steel scraps	108.76	376.6
Miscellaneous	17.1	49.53
Total (A+B + C + D + E + F + G + H)	26,750.35	16,707.9
Waste intensity per rupee of turnover		
(Total waste generated / Revenue from operations)	48.89	46.1
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	2.18	2.05
Waste intensity in terms of physical output	-	-
Waste intensity (optional) - the relevant metric may be selected by the entity	-	-
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	118.29	426.13
(ii) Re-used	19,676.25	6497.1
(iii) Other recovery operations	0	0
Total	19,794.54	6,923.23
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0	0
(ii) Landfilling	6,825.43	9,784.67
(iii) Other disposal operations	0	0
Total	6,825.43	9,784.67

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Sunteck recognises the importance of monitoring and recording the environmental impacts of the Company's operations. However, no independent assessment/ assurance is carried out by external agencies.

10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

Currently, the construction waste produced at our sites is segregated and monitored by contractors. We have partnered with authorised vendors to treat construction waste and ensure that the waste is discarded as per regulatory guidelines. Processes to safely manage and handle waste material have been employed in several projects developed by the Company. Waste that is recyclable is diverted from disposal and is sent to relevant vendors for further treatment. At our Head office, Sunteck Centre, the Company has partnered with Viagreen for collection, segregation and recycling of the dry waste generated head office. The waste is segregated, and appropriate measures are taken for transporting the collected waste to recycling sites. Dry waste is further segregated into paper, plastic, Glass & Metal. Dry waste is segregated & shredded at site & goes to the Viagreen's treatment plant.

"ANNEXURE - III" (Contd.)

11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

The Company has no operations/offices in/around ecologically sensitive areas. However, the Company does have Environmental Clearance for all its existing projects as required by law.

Recognising the importance of biodiversity, we choose to conduct these assessments on a case-by-case basis, tailored to the specific environmental context of each project. In FY24, we undertook biodiversity assessments for the first time as a sustainable practice. This initiative marks a significant step in our sustainability journey, reinforcing our endeavor to ecological preservation and responsible development. By integrating biodiversity assessments into our planning and construction processes, we ensure that our projects contribute positively to the environment, fostering a balance between development and nature.

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Proposed expansion of Township development comprising of Residential building	EC23B039MH196352	1/11/2023	Yes	Yes	Nil

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

Yes, the Company is compliant with all applicable environmental law/ regulations/ guidelines in India.

Leadership Indicators

1. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

The Company does not withdraw, consume, or discharge water in areas of water stress.

For each facility / plant located in areas of water stress, provide the following information:

- (i) Name of the area: Not applicable
- (ii) Nature of operations: Not applicable
- (iii) Water withdrawal, consumption, and discharge in the following format: Not applicable

2. Please provide details of total Scope 3 emissions & its intensity, in the following format:

Efforts are underway to track and record this data and it will be made available from FY 2024-25

3. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

The Company has no operations/offices in/around ecologically sensitive areas.

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

S. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	EDGE building certification	EDGE- IFC, a member of World Bank Group is a green building standard aimed at making buildings more resource-efficient	Target of making projects 20% more resource-efficient
2.	Rainwater harvesting	Company has undertaken rainwater harvesting in order to recycle water and decrease its dependence on third-party sources	Decreased water intensity per sq ft.
3.	Sewage Treatment Plan	The Company has installed sewage treatment plant in its major projects which enables to reduce water consumptions as wastewater is recycled and used for various purposes like flushing	Reduced water consumption with use of recycled water
4.	Solar water heaters	The Company has installed solar water heater in some of its existing projects so as an alternative to rely on solar energy as compared to traditional energy	Energy conservation & Emissions reduction
5	Use of LED Lightning	LED lights are highly energy-efficient, converting a significant portion of electricity into light rather than heat. They consume less energy than traditional incandescent and CFL bulbs, resulting in substantial energy savings	Energy conservation
6	Low flow aerators	The aerators helps in conscious utilising of water as a resources and helps save atleast 20% to 30% of water consumption.	Reduction in water consumption

5. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

At Sunteck, the disaster management plan integrates comprehensive training programs and drills to educate construction site personnel about fire prevention, detection, and response protocols. This ensures that the workforce is well-prepared to handle fire emergencies, familiar with evacuation routes, assembly points, and proper usage of firefighting equipment. Additionally, regular maintenance and inspections are conducted to identify and address any potential issues or malfunctions in the fire prevention systems. Also, on-site safety team plays a vital role in ensuring the effectiveness of hazard prevention and control measures if a disaster should occur. By implementing these proactive measures and emphasising prevention, early detection, and swift response, the construction site can effectively mitigate the risks associated with acute and natural hazards, creating a safer working environment for everyone involved.

6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

Sunteck hasn't conducted any assessment to identify if there is any significant adverse impact to the environment arising from the value chain. However, as a measure to educate our suppliers on environmental concerns of their operations, we conducted a comprehensive ESG training for them. The training covered environmental practices to minimise ecological impact, social responsibilities such as fair labor and community engagement, and governance principles focusing on ethics, transparency, and compliance. This initiative is a part of Sunteck's strategy to establish a sustainable and responsible value chain, thus boosting its brand reputation and potentially improving its overall ESG performance.

7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

Sunteck doesn't assess its value chain partners for any environmental related impacts.

"ANNEXURE - III" (Contd.)

PRINCIPLE 7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations.

The Company is affiliated with four trade or industry chambers/associations.

b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such a body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	The Associated Chambers of Commerce of India (AASOCHAM)	National
2	National Real Estate Development Council (NAREDCO)	National
3	CREDAI-MCHI (Maharashtra Chamber of Housing Industry)	State
4	IMC (Chambers of Commerce and industry)	National

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

Sunteck has no cases of non-compliances with respect to local laws applicable or any anti-trust or anti-competitive behavior in which the Company has been identified as a participant.

Leadership Indicators

1. Details of public policy positions advocated by the entity:

Sunteck does not publicly advocate any policies.

PRINCIPLE 8 Businesses should promote inclusive growth and equitable development.

Essential Indicators

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

Not applicable as there were no projects that required a Social Impact Assessment (SIA) as per applicable laws in the current year.

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

No Rehabilitation and Resettlement project were undertaken during FY24.

3. Describe the mechanisms to receive and redress grievances of the community.

The Company's goal is to promote a healthy and positive ecosystem for all its stakeholders by hearing them out, reciprocating to their problems and by resolving them within the stipulated period of time. The Company's operations do have a significant impact on the local community in which it operates. Hence, a robust grievance redressal mechanism is implemented where stakeholders can reach out with issues and concerns by filling up a form available on website and also can communicate through dedicated email id available for resolving grievances.

Further, all the customer grievance receipt, resolution, and maintenance of records are done as per the Grievance Redressal Policy, as amended from time to time. Link: <https://www.sunteckindia.com/grievance-redressal>

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

	2023-24	2022-23
Directly sourced from MSMEs/small producers	27.5%*	26.45%
Directly from within India	100%	100%

*Approximate basis

5. Job creation in smaller towns - Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost

Location	2023-24	2022-23
Rural	0%	0%
Semi-urban	19.66%	22.69%
Urban	0.24%	0.33%
Metropolitan	80.1%	76.98%

Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Not Applicable

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

As a company we are deeply determined to our CSR activities as we recognise that we have a responsibility to not only provide quality products & services to our customers but also to the communities in which we operate. Though we have partnered with local CSR agencies like Samhita to support various causes such as education, healthcare, volunteering, and environmental sustainability, we don't currently cater to communities that fall in designated aspirational districts as identified by government bodies.

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalised /vulnerable groups? (Yes/No)

The Company does have a supplier code of conduct and material policy which encompasses sustainable sourcing components; however, we don't have a preferential procurement Policy where preference is given to purchase from suppliers comprising marginalised/vulnerable groups.

(b) From which marginalised /vulnerable groups do you procure?

Not Applicable

(c) What percentage of total procurement (by value) does it constitute?

Not Applicable

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

Not Applicable

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Not Applicable

"ANNEXURE - III" (Contd.)

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefited from CSR Projects	% of beneficiaries from vulnerable and marginalised groups
1.	Project Lajja -empowered 1,000 adolescents' girls promoting menstrual health awareness at various municipal schools & distributed reusable cloth pads kits to each girl, offering a cost-efficient and eco-friendly approach to managing menstrual health and hygiene.	1,000 Adolescent girls	Nil
2.	Beach Cleanup & Awareness sessions on marine pollution at Suruchi beach, Vasai	Total of 424 students were sensitised from 8 different colleges and schools on Marine Pollution through classroom sessions in which students were sensitised about marine pollution, its sources, types, and impact. They were also motivated to incorporate eco-friendly habits to curb marine pollution at individual levels. Furthermore, Company was able to install 4 Benches (made from recycled products) at Suruchi Beach from waste collected from sequential beach cleaning activities.	Nil

PRINCIPLE 9 Businesses should engage with and provide value to their consumers in a responsible manner.

Essential Indicators

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

Yes, the Company has a dedicated grievance mechanism form available on website where in stakeholders can reach out with their concerns. Additionally, the Company has an app-based platform for its existing customers for various projects where in they can raise issues/concerns with the facilities team. The Company believes grievances also have positive dimensions as it gives the Company the insights at the existing gaps which are captured and corrected to prevent future acts of indiscipline and deterioration of the work environment.

2. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:

Not Applicable

3. Number of consumer complaints in respect of the following:

	2023-24		Remarks	2022-23		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0	Nil	0	0	Nil
Advertising	0	0	Nil	0	0	Nil
Cyber-security	0	0	Nil	0	0	Nil
Delivery of essential services	0	0	Nil	0	0	Nil

	2023-24		Remarks	2022-23		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Restrictive Trade Practices	0	0	Nil	0	0	Nil
Unfair Trade Practices	0	0	Nil	0	0	Nil
Other	434	25	We have 5 cases registered with RERA. The other issues mainly involve disputes over maintenance charges, which will be addressed during the formation of the society. Additionally, there are complaints related to leakage and seepage that are currently being resolved	654	10	Out of 10 escalations, 1 pertains to leakage in ODC and another to possession issues, both of which are in litigation. The remaining 8 escalations are related to parking and in discussion with management

4. Details of instances of product recalls on account of safety issues:

Not applicable

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.

Yes, the Company has a dedicated cybersecurity policy in place outlining mechanisms adequately prepared to mitigate Privacy and Cybersecurity related risks. The Company is dedicated to ensuring data privacy and Cybersecurity by putting in place a solid framework that enables well-organised information management and incorporates all security protocols to safeguard the integrity of data that is stored within the Company's infrastructure. Please find the policy here: <https://www.sunteckindia.com/investor-relations#codepolicies>

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

None as no issues have been raised at Sunteck relating to advertising, and delivery of essential services; cyber security, and data privacy of customers; re-occurrence of instances of product recalls; penalty/ action taken by regulatory authorities on safety of products/ services.

7. Provide the following information relating to data breaches:

- a. Number of instances of data breaches**
- b. Percentage of data breaches involving personally identifiable information of customers**
- c. Impact, if any, of the data breaches**

Nil

Leadership Indicators

1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).

The Company's website provides information on all the new projects being developed by the Company. Additionally, exhibitions are conducted to showcase current and upcoming properties to our customers. Link to the website - <https://www.sunteckindia.com>.

"ANNEXURE - III" (Contd.)

2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.

Sunteck believes it is important to provide consumers with accurate and up-to-date information about the property, including its features, amenities, and potential risks. This information is made available by facility team during hand over about all relevant information like protocol to follow safety guidelines covering fire and electrical safety and emergency preparedness plan. Constant efforts are made to make customers aware about their role as responsible users and to act responsibly wherever possible like segregation on types of waste, encouraging them to switch to green power and conscious utilisation of water. Furthermore, we are providing a tenant design guidelines document aligned with EDGE green building requirements. This comprehensive document offers a concise overview of the best post-occupancy green building practices to be followed.

3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.

Not Applicable

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief.

Yes, the entity displays the information about the product and its various features within the product brochures, marketing partners, on site sales representatives and also on its website. Customers are educated on sustainability features at the time of sales (brochures) and final possession (verbal discussion). The product brochures also inform the customer about the sustainability features, amenities, ecology surrounding the site, Green ratings and the related customer benefits.

5. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

The Company strives for an innovation driven and people-centric business model so as to bring better satisfaction for our customers. To achieve this goal, a survey was conducted for our customers to ensures regular communication, providing a better understanding of their experience, identifying scope for improving in engagement and addressing any gaps in service quality.

6. Provide the following information relating to data breaches:

a. Number of instances of data breaches along-with impact

Nil

b. Percentage of data breaches involving personally identifiable information of customers

Nil.