

# BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

1. **Corporate Identity Number (CIN) of the Listed Entity:** L74899HR1989PLC051918
2. **Name of the Listed Entity:** Omaxe Limited
3. **Year of incorporation:** 1989
4. **Registered office address:** 19-B, First Floor Omaxe Celebration Mall, Sohna Road, Gurugram, Haryana -122001
5. **Corporate address:** 7, Local Shopping Complex, Kalkaji, New Delhi- 110019
6. **E-mail:** secretarial\_1@omaxe.com
7. **Telephone:** 011-41896680-85
8. **Website:** www.omaxe.com
9. **Financial Year (FY) for which reporting is being done:** 2022-23
10. **Name of the Stock Exchange(s) where shares are listed:** BSE Limited (BSE), National Stock Exchange of India Limited (NSE)
11. **Paid-up Capital:** Rs. 1,82,90,05,400/-
12. **Name and contact details (telephone, e-mail address) of the person who may be contacted in case of any queries on the BRSR report:**  
 Name: Mr. Vikas Khandelwal  
 Designation: Company Secretary & Compliance Officer  
 Telephone: 011-41896680-85; E-mail Id: secretarial\_1@omaxe.com
13. **Reporting boundary - 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).**

The disclosures under this report are made on a standalone basis.

### II. Products/ Services

#### 14. Details of business activities (accounting for 90% of the entity's turnover):

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Real Estate	Real Estate Activities with own or leased property	93.38%

#### 15. 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	Real Estate Projects	681	93.38%

### III. Operations

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

Location	Number of plants	Number of offices	Total
National	Not applicable	29*	29*
International	Not applicable	0	0

\*Cities in which the Company currently operates and has its projects.

#### 17. Markets served by the entity:

##### a. Number of locations

Locations	Number
National (No. of States)	8*
International (No. of Countries)	Nil

\*States in which the Company currently operates and has its projects.

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

Not Applicable

##### c. A brief on types of customers

Omaxe is one of the leading real estate companies in North India that has been contributing to sustainable infrastructure with its diverse portfolio which includes residential, commercial and retail projects that cater the needs of businesses as well as individual customers. Omaxe's real estate portfolio comprises of the following:

- i. Residential including housing projects, integrated township, residential plots that serve residential customers;
- ii. Commercial and Retail including malls, shopping complexes, plots and recreational spaces.

### IV. Employees

#### 18. Details as at the end of FY:

##### a. Employees and Workers (including differently abled):

S.No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/ A)	No. (C)	% (C/ A)
<b>EMPLOYEES</b>						
1.	Permanent (D)	473	429	90.70%	44	9.30%
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total employees (D+E)	<b>473</b>	<b>429</b>	<b>90.70%</b>	<b>44</b>	<b>9.30%</b>
<b>WORKERS</b>						
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	533	450	84.42%	83	15.58%
6.	Total workers (F+G)	<b>533</b>	<b>450</b>	<b>84.42%</b>	<b>83</b>	<b>15.58%</b>

**b. Differently abled Employees and Workers:**

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

**19. Participation/ Inclusion/ Representation of women**

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/ A)
<b>Board of Directors</b>	6	1	16.67%
<b>Key Managerial Personnel</b>	3	0	0.00%

**20. Turnover rate for permanent employees and workers**

	FY 2022-23			FY 2021-22			FY 2020-21		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Permanent Employees</b>	1.42%	-2.22%	1.07%	-36.30	-48.28%	-37.68	-17.10%	0.00%	-15.43%
<b>Permanent Workers</b>	There are no permanent workers in Omaxe Limited								

Note: The turnover rate of permanent employees is based on the number of permanent employees on the payroll of Omaxe Limited as at the year end dates.

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

**21. (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.	Guild Builders Private Limited	Holding Company	63.57	No Such entities are separate legal entities, hence they follow BR Initiatives as per laws as may applicable to them.
2.	Anjaniputra Builders Private Limited	Subsidiary	100.00	
3.	Aashna Realcon Private Limited	Subsidiary	100.00	
4.	Aradhya Real Estate Private Limited	Subsidiary	100.00	
5.	Arman Builders Private Limited	Subsidiary	100.00	
6.	Atulah Contractors and Constructions Private Limited	Subsidiary	100.00	
7.	Blackbull Retails Private Limited	Subsidiary	100.00	
8.	Chapal Buildhome Private Limited	Subsidiary	100.00	
9.	Colors Real Estate Private Limited	Subsidiary	100.00	
10.	Dhanu Real Estate Private Limited	Subsidiary	100.00	
11.	Dreamze New Faridabad Developers LLP	Subsidiary	99.99	
12.	Ekansh Buildtech Private Limited	Subsidiary	100.00	

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)
13.	Giant Dragon Mart Private Limited	Joint Venture	50.00	No Such entities are separate legal entities, hence they follow BR Initiatives as per laws as may applicable to them.
14.	Golden Glades Builders Private Limited	Subsidiary	100.00	
15.	Green Planet Colonisers Private Limited	Subsidiary	100.00	
16.	Hamara Ghar Constructions and Developers Private Limited	Subsidiary	100.00	
17.	Hartal Builders and Developers Private Limited	Subsidiary	75.00	
18.	Jagdamba Contractors and Builders Limited	Subsidiary	100.00	
19.	JKB Constructions Private Limited	Subsidiary	100.00	
20.	JRS Projects Private Limited	Subsidiary	100.00	
21.	Kamini Builders and Promoters Private Limited	Subsidiary	100.00	
22.	Kashish Buildtech Private Limited	Subsidiary	100.00	
23.	Kavya Buildtech Private Limited	Subsidiary	100.00	
24.	Landlord Developers Private Limited	Subsidiary	100.00	
25.	Link Infrastructure and Developers Private Limited	Subsidiary	100.00	
26.	Ludhiana Wholesale Market Private Limited	Subsidiary	100.00	
27.	Mehboob Builders Private Limited	Subsidiary	100.00	
28.	Mehtab Infratech Private Limited	Subsidiary	100.00	
29.	Monarch Villas Private Limited	Subsidiary	100.00	
30.	MR Real Estate Private Limited	Subsidiary	100.00	
31.	National Affordable Housing Limited	Subsidiary	100.00	
32.	Navratan Techbuild Private Limited	Subsidiary	100.00	
33.	Nexten (I) Growth Private Limited	Subsidiary	100.00	
34.	Nexten Infra Growth Private Limited	Subsidiary	100.00	
35.	Nexten Infra Private Limited	Subsidiary	100.00	
36.	Nexten Real Growth Private Limited	Subsidiary	100.00	
37.	Nexten Super Growth Private Limited	Subsidiary	100.00	
38.	Oasis Township Private Limited	Subsidiary	100.00	
39.	Omaxe Buildhome Limited	Subsidiary	100.00	
40.	Omaxe Buildwell Limited	Subsidiary	100.00	
41.	Omaxe Entertainment Limited	Subsidiary	100.00	
42.	Omaxe Forest Spa and Hills Developers Limited	Subsidiary	100.00	
43.	Omaxe Garv Buildtech Private Limited	Subsidiary	100.00	
44.	Omaxe Heritage Private Limited	Subsidiary	100.00	
45.	Omaxe Hitech Infrastructure Company Private Limited	Subsidiary	100.00	
46.	Omaxe Housing and Developers Limited	Subsidiary	100.00	
47.	Omaxe Housing And Infrastructure Limited	Subsidiary	100.00	
48.	Omaxe Indore Developers Limited	Subsidiary	100.00	
49.	Omaxe Infotech City Developers Limited	Subsidiary	100.00	
50.	Omaxe Infrastructure Limited	Subsidiary	100.00	
51.	Omaxe International Bazaar Private Limited	Subsidiary	100.00	
52.	Omaxe New Amritsar Developers Private Limited	Subsidiary	100.00	
53.	Omaxe New Chandigarh Developers Private Limited	Subsidiary	100.00	

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)
54.	Omaxe New Faridabad Developers Private Limited	Subsidiary	100.00	No Such entities are separate legal entities, hence they follow BR Initiatives as per laws as may applicable to them.
55.	Omaxe Next Private Limited	Subsidiary	100.00	
56.	Omaxe Pancham Realcon Private Limited	Subsidiary	100.00	
57.	Omaxe Power Private Limited	Subsidiary	100.00	
58.	Omaxe Rajasthan SEZ Developers Limited	Subsidiary	100.00	
59.	Omaxe World Street Private Limited	Subsidiary	75.00	
60.	Omtech Infrastructure and Construction Limited	Subsidiary	100.00	
61.	Pam Developers (India) Private Limited	Subsidiary	100.00	
62.	Panchi Developers Private Limited	Subsidiary	100.00	
63.	PP Devcon Private Limited	Subsidiary	75.00	
64.	Primordial Buildcon Private Limited	Subsidiary	100.00	
65.	Rivaj Infratech Private Limited	Subsidiary	51.00	
66.	Rohtas Holdings (Gulf) Limited	Subsidiary	100.00	
67.	Sarthak Landcon Private Limited	Subsidiary	100.00	
68.	Sarva Buildtech Private Limited	Subsidiary	100.00	
69.	Shamba Developers Private Limited	Subsidiary	100.00	
70.	Shikhar Landcon Private Limited	Subsidiary	100.00	
71.	Shine Grow New Faridabad LLP	Subsidiary	99.99	
72.	Sri Balaji Green Heights Private Limited	Subsidiary	75.00	
73.	Worldstreet Sports Centre Limited	Subsidiary	100.00	
74.	Zodiac Housing and Infrastructure Private Limited	Subsidiary	100.00	
75.	Aadhira Developers Private Limited	Subsidiary	100.00	
76.	Ashray Infrabuild Private Limited	Subsidiary	100.00	
77.	Ayush Landcon Private Limited	Subsidiary	100.00	
78.	Bhanu Infrabuild Private Limited	Subsidiary	100.00	
79.	Caspian Realtors Private Limited	Subsidiary	100.00	
80.	Daman Builders Private Limited	Subsidiary	100.00	
81.	Damodar Infratech Private Limited	Subsidiary	100.00	
82.	Davesh Technobuild Private Limited	Subsidiary	100.00	
83.	Dinkar Realcon Private Limited	Subsidiary	100.00	
84.	Ekapad Developers Private Limited	Subsidiary	100.00	
85.	Hemang Buildcon Private Limited	Subsidiary	100.00	
86.	Hiresh Builders Private Limited	Subsidiary	100.00	
87.	Manit Developers Private Limited	Subsidiary	100.00	
88.	NRI City Developers Private Limited	Subsidiary	100.00	
89.	Rupesh Infratech Private Limited	Subsidiary	100.00	
90.	Sanvim Developers Private Limited	Subsidiary	100.00	
91.	Shubh Bhumi Developers Private Limited	Subsidiary	100.00	
92.	Silver Peak Township Private Limited	Subsidiary	100.00	
93.	Aarzo Technobuild Private Limited	Subsidiary	100.00	
94.	Abheek Builders Private Limited	Subsidiary	100.00	

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)
95.	Radiance Housing and Properties Private Limited	Subsidiary	100.00	No Such entities are separate legal entities, hence they follow BR Initiatives as per laws as may applicable to them.
96.	Ashok Infrabuild Private Limited	Subsidiary	100.00	
97.	Glacier Agro Foods Products Private Limited	Subsidiary	100.00	
98.	Tejpal Infra Developers Private Limited	Subsidiary	100.00	
99.	S N Realtors Private Limited	Subsidiary	100.00	
100.	Oasis Suncity Realtors Private Limited	Subsidiary	100.00	
101.	Reliable Manpower Solutions Limited	Subsidiary	99.18	
102.	RPS Suncity Promoters and Developers Private Limited	Subsidiary	100.00	
103.	Satvik Hitech Builders Private Limited	Subsidiary	100.00	
104.	Omaxe India Trade Centre Private Limited	Subsidiary	90.00	
105.	Aviral Colonizers Private Limited	Subsidiary	100.00	
106.	Satkar Colonisers Private Limited	Subsidiary	100.00	
107.	Utkrisht Real Estate and Associates Private Limited	Subsidiary	100.00	
108.	Abhas Realcon Private Limited	Subsidiary	75.00	
109.	Adesh Realcon Private Limited	Subsidiary	75.00	
110.	Anveshan Builders Private Limited	Subsidiary	75.00	
111.	Navadip Developers Private Limited	Subsidiary	75.00	
112.	Salvatore Infra Buildtech Limited	Subsidiary	75.00	
113.	Estatelance Developers Private Limited	Subsidiary	100.00	
114.	Estatelance Real Estate Private Limited	Subsidiary	100.00	
115.	Capital Redevelopment Private Limited	Associate	24.00	
116.	FBD Real Grow Private Limited	Associate	25.00	
117.	Omaxe Be Together Project Developers Private Limited (Formerly known as Be Together Vrindavan Developers Private Limited)	Associate	30.00	
118.	Parkash Omaxe Amusement Park Private Limited	Joint Venture	50.00	

## VI. CSR Details

### 22. Whether CSR is applicable as per section 135 of Companies Act, 2013: (Y/ N): No

(i) **Turnover:** 459.39 Cr.

(ii) **Net worth:** - 1014.40 Cr.

## VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Y/ N) (If yes, then provide web-link for grievance redress policy)	FY 2022-23			FY 2021-22		
		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. The contact details for grievance redressal are available at <a href="https://www.omaxe.com/investor/address-for-grievance-redressal-and-other-details">https://www.omaxe.com/investor/address-for-grievance-redressal-and-other-details</a> .	NIL	NIL	NIL	NIL	NIL	NIL
Investors (other than shareholders)	Yes. The contact details for grievance redressal are available at <a href="https://www.omaxe.com/investor/address-for-grievance-redressal-and-other-details">https://www.omaxe.com/investor/address-for-grievance-redressal-and-other-details</a> .	NIL	NIL	NIL	NIL	NIL	NIL
Shareholders	Yes. The contact details for grievance redressal are available at <a href="https://www.omaxe.com/investor/contact-information-of-the-designated-officials">https://www.omaxe.com/investor/contact-information-of-the-designated-officials</a> .	3	NIL	Complaints pertained to matters including payment of unclaimed dividend, request for Annual Report etc. and were promptly resolved.	3	NIL	Complaints pertained to matters including payment of unclaimed dividend, request for Annual Report etc. and were promptly resolved.
Employees and Workers	Yes. Grievance redressal mechanisms are available in intranet as per the Company's HR policy.	NIL	NIL	NIL	NIL	NIL	NIL
Customers	Yes. Grievance redressal mechanisms are available	168	56	NIL	127	67	NIL
Value Chain Partners	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Others (Please Specify)	-	-	-	-	-	-	-

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

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	Regulatory Compliance	Risk	Refer to Point 1 below	Refer to Point 1 below	Negative
2	Physical Impacts of Climate Change	Risk	Refer to Point 2 below	Refer to Point 2 below	Negative
3	Health and Safety	Risk	Refer to Point 3 below	Refer to Point 3 below	Negative
4	Water and Wastewater Management	Risk	Refer to Point 4 below	Refer to Point 4 below	Negative
5	Energy Efficiency	Risk	Refer to Point 5 below	Refer to Point 5 below	Negative

### 1. Regulatory Compliance

#### Risk:

Failure to comply with rapidly changing regulatory requirements can result in adverse impact for the Company and erode stakeholders' trust. Evolving environmental and social regulations present a risk of potential non-compliance which, if not met, can result in fines, penalties and adverse impact on brand reputation.

#### Mitigation Measures:

Omaxe is committed to promote a culture of compliance within the organization supported by a zero-tolerance policy and has a robust set of environmental, social and governance related policies in place. At Omaxe, compliance related risks are reviewed at regular intervals and procedures and practices constantly evolve to fulfil compliance requirements based on extant rulings and changing market conditions.

### 2. Physical Impacts of Climate Change

#### Risk:

Increased severity of extreme weather events including natural disasters, rising mean temperatures and sea levels pose a risk of damage to real estate portfolio. It can result in adverse impacts in future in the form of costs to repair and replace damaged assets in case of any natural disasters and subsequent property downtime.

#### Mitigation Measures:

As part of its mitigation strategy, Omaxe maps physical risks for its current portfolio and future development projects, followed by incorporation of physical adaptation and mitigation measures for assets that are identified at risk.

### 3. Health and Safety

#### Risk:

Omaxe is engaged in construction of buildings and management of a significant portfolio of real estate assets. Owing to the nature of the operations, health and safety is identified as a potential risk for business. Ensuring the safety of



its employees, contractors and the local communities surrounding project sites is its top-most priority. Further, it is a constant endeavor to provide safe and secured facilities to all customers.

**Mitigation Measures:**

- Health and safety is one of the key priorities for Omaxe. Safety, Health and well-being programmes and trainings are organized for workforce.

**4. Water and Wastewater Management**

**Risk:**

A growing population and irregular monsoons have resulted in water becoming an increasingly scarce resource. Many Indian cities have been designated as 'critical' or 'over-exploited' under national groundwater assessment. Thus, efficient water management through conservation and reuse is prime focus for OMAXE to ensure its business sustainability, optimize operational costs as well promote sustainable communities around Omaxe properties and townships.

**Mitigation Measures:**

- Water recycling measures have been implemented across all projects to reduce freshwater drawal. Rainwater harvesting is practiced in all managed properties to recharge groundwater;
- Other measures include installation of high efficiency fixtures, sensor based low-flow water taps and leak detection systems in washrooms and drip irrigation in gardens, which has helped promote water conservation.

**5. Energy Efficiency**

**Risk:**

India has witnessed a rapid growth in green infrastructure driven by Government led policies, incentives and targeted initiatives. Similar trends are observed with several international standards, showing inclination towards sustainable urban infrastructure and energy efficient buildings. Therefore, promotion of energy efficient buildings is a priority.

**Mitigation Measures:**

- Omaxe undertakes various measures to reduce the carbon footprint of its portfolio through energy efficiency measures and adoption of renewable energy to stay ahead of climate-related policy changes, tap into the lucrative green infrastructure market and maintain a competitive edge.

**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.

P1 Businesses should conduct and govern themselves with integrity and in a manner that is Ethical, Transparent and Accountable.

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

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

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

P 5 Businesses should respect and promote human rights.

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

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

P 8 Businesses should promote inclusive growth and equitable development.

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

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
<b>Policy and Management Processes</b>									
1. a. Whether your entity's policy/ policies cover each principle and its core elements of the NGRBCs. [Yes/ No (Y/ N)].	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Y/ N).	Wherever necessary, the policies were placed before the Board and requisite approvals were obtained.								
c. Web Link of the Policies, if available.	Internal policies are available for employees only. For other policies. Please refer to the link: <a href="https://www.omaxe.com/investor">https://www.omaxe.com/investor</a>								
2. Whether the entity has translated the policy into procedures (Y/ N)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Y/ N).	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. Name of the national and international codes/ certifications/ labels/ standards adopted by your entity and mapped to each principle.	Not Applicable								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	We are in the process of re-evaluating our existing sustainability standards and setting the goals and targets in line with the NGRBC/ GRI framework.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	We are in the process of re-evaluating our existing sustainability standards and setting the goals and targets in line with the NGRBC/ GRI framework.								

**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).	Omaxe is committed to make the business sustainable and socially responsible. We prioritize the conservation of natural resources and improving operational efficiencies to minimize our environmental footprint. We aim to build resilience in our business and among our stakeholders and we monitor our activities and their environmental and social impacts to ensure that we create value for all stakeholders.
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility Policy (ies).	Board of Directors supported by the Managing Director who briefs the Board on subject matter periodically.
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Y/ N). If yes, provide details.	No. However, the respective areas of the ESG matters are monitored by the identified individual namely the Departmental Heads of the respective departments and they periodically update/confirm to the Board.

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)								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action	Director									Quarterly & Annually								
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	Director									Quarterly & Annually								

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Y/ N). If yes, provide name of the agency.	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
	N	N	N	N	N	N	N	N	N

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the Principles material to its business (Y/ N)	Not Applicable								
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Y/ N)									
The entity does not have the financial or/ human and technical resources available for the task (Y/ N)									
It is planned to be done in the next financial year (Y/ N)									
Any other reason									

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

**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 FY 2022-23:

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
<b>Board of Directors (BoDs)</b>	One	Directors of the Company, at the time of their appointment, are familiarized on the Company's Core Values, Code of Conduct, including the purpose and the business it operates and social responsibilities. At each meeting of the Board/ Audit Committee, members also deliberate on key regulatory matters that helps to reflect and focus on key strategies. As a part of Board, Audit and CSR agenda, members also discuss various sustainable and Governance initiatives of the Company, including regulatory and economic trends. Key Regulatory changes, amendments etc. are circulated regularly. Business, strategy, risk assessment, mitigation etc., are also covered on periodical basis.	100%
<b>Key Managerial Personnel (KMPs)</b>	One	Topics pertaining to Key Regulatory issues, recent regulatory updates and amendments etc. are circulated regularly. The Code of Conduct is also familiarized, which helps the KMP's to drive the Company's values and purpose in all key business activities.	100%
<b>Employees other than BoDs &amp; KMPs</b>	One	Topics pertaining to Omaxe Code of Conduct, Prevention of Sexual Harassment at Workplace, Health, Safety, Security and Environment. Environment Management, Awareness on Standard Operating Procedures for safety and Safety Hazard Identification and Risk Assessment.	100%
<b>Workers</b>	One	Topics pertaining to Labour Laws, Fire Safety Training, Health & Security, Awareness on Standard Operating Procedures for safety and Safety Hazard Identification and Risk Assessment etc.	100%

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 FY, 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 Requirements) Regulations, 2015 and as disclosed on the entity's website):

## Monetary

Category	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case
Penalty/ Fine	Nil	-	Nil	Not Applicable
Settlement	Nil	-	Nil	Not Applicable
Compounding fee	Nil	-	Nil	Not Applicable

**Non-Monetary**

Category	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Y/ N)
Imprisonment	Nil	-		Not Applicable
Punishment	Nil	-		Not Applicable

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.

Case Details	Name of regulatory/ enforcement agencies/ judicial institutions
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.

Yes, Omaxe has an Anti-Corruption and Anti-Bribery Policy as part of its Code of Conduct. The policy is applicable to all employees and Board of Directors of the Omaxe, including its subsidiaries, associates and Joint Venture Companies.

As per the policy guidelines, Omaxe has zero tolerance towards any form of bribery and corruption. Omaxe, its Directors and employees are expected to be aware of and follow all applicable anti-corruption and anti-bribery laws wherever Omaxe does business. They are prohibited to receive, offer or make directly/ indirectly any illegal payments, gifts, donations or benefits which are intended to obtain business or unethical favours. All Directors and employees at Omaxe are provided with training on the Code of Conduct, including anti-corruption and anti-bribery guidelines. Furthermore, all Directors and the Senior Management personnel of the Company are required to submit annual compliance declaration, to acknowledge their understanding and affirm compliance to the defined guidelines.

Omaxe has established a Whistle Blower mechanism that allows employees, Directors and third parties to report any unethical business practices, including complaints related to bribery and corruption, to the Whistle Blower Committee or to the Chairman of Audit Committee, for undertaking suitable corrective actions. The said policies are available at <https://www.omaxe.com/investor/other-codes-policies>.

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

	FY 2022-23	FY 2021-22
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

	FY 2022-23		FY 2021-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	-	Nil	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	-	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.

**LEADERSHIP INDICATORS****1. Awareness programmes conducted for value chain partners on any of the Principles during the FY:**

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
Not Applicable	Not Applicable	Not Applicable

In the Company's Supplier code of Conduct and general terms and conditions, the Company has emphasized on all integrity aspects which are applicable to all suppliers.

**2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Y/ N). If yes, provide details of the same.**

Yes, Omaxe has put in place stringent procedures to avoid/ manage any conflicts of interest involving members of the Board and other employees. Company's Code of Conduct provides guidelines for preventing and addressing any conflicts of interest. As per the guidelines, Directors are required to disclose any potential conflicts of interests to the Board of Directors or any Committee thereof and abstain from participating in the decision-making, voting or in influencing the decision on the areas resulting in potential conflict of interest.

Further, Omaxe's Policy on Related Party Transactions & its materiality lays down the procedures to be followed for identification, approval and disclosure of all transactions between the Company and related parties. The Policy prohibits any Director who may have a potential conflict of interest in any Related Party Transaction, to participate in discussions or vote on such transactions.

**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.**

	FY 2022-23	FY 2021-22	Details of improvements in environmental and social impacts
<b>R&amp;D</b>	*	*	1. Wastage Reduction at all stages of the Process 2. Reduction in usage of A4 stationery
<b>Capex</b>	*	*	

\*Most of the expenditure incurred in R & D and Capital budget are the project costs and are ongoing. Hence, not separable and not provided separately.

**2. a. Does the entity have procedures in place for sustainable sourcing? (Y/ N).**

Yes, OMAXE's Supplier Code of Conduct and the ESG criteria verified at site ensures that sustainability is integrated into its supply chain.

**b. If yes, what percentage of inputs were sourced sustainably?**

Presently, OMAXE has not carried out any assessment of the percentage of inputs which were sourced sustainably.

**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.**

Omaxe is engaged in the business of real estate development, including construction, operation and maintenance of real estate properties. OMAXE is not involved in reuse or recycling of the developed products. However, Omaxe has processes in place to ensure that waste generated within the projects during operation and maintenance of buildings is recycled,

reused or treated as per the applicable regulatory requirements. All non-hazardous solid waste such as paper, plastic and metal scrap are recycled through authorised recyclers.

**4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Y/ N). 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.**

No. The EPR is not applicable to Company's activities, as the Company is engaged in the business of real estate development. However, Omaxe has processes in place to ensure that waste generated within its projects, during construction and operation and maintenance of buildings, is responsibly recycled, reused, or treated as per regulatory requirements.

**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?**

Omaxe has not yet conducted LCA for its products.

NIC Code	Name of Product/ Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective/ Assessment was conducted	Whether conducted by independent external agency (Y/ N)	Results communicated in public domain (Y/ N) If yes, provide the web-link.
----------	--------------------------	---------------------------------	-------------------------------------------------------------------------	---------------------------------------------------------	----------------------------------------------------------------------------

Not Applicable

**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.**

Name of Product/ Service	Description of the risk/ concern	Action Taken
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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	
	FY 2022-23	FY 2021-22
-	N.A*	N.A*

**4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled and safely disposed, as per the following format:**

Material	FY 2022-23			FY 2021-22		
	Reused	Recycled	Safely Disposed	Reused	Recycled	Safely Disposed
Plastics (including packaging)	N.A*			N.A*		
E-waste						
Hazardous waste						
Other waste						

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
N.A*	

\*Omaxe is engaged in the business of real estate development, including construction, operation and maintenance of real estate properties. Hence, not applicable to its business.

**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:

% of employees covered by

Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		No. (B)	% (B/ A)	No. (C)	% (C/ A)	No. (D)	% (D/ A)	No. (E)	% (E/ A)	No. (F)	% (F/ A)
<b>Permanent employees</b>											
Male	429	429	100%	429	100%	0	0%	429	100%	0	0%
Female	44	44	100%	44	100%	44	100%	0	0%	0	0%
<b>Total</b>	<b>473</b>	<b>473</b>	<b>100%</b>	<b>473</b>	<b>100%</b>	<b>44</b>	<b>100%</b>	<b>429</b>	<b>100%</b>	<b>0</b>	<b>0%</b>
<b>Other than Permanent employees</b>											
Male	Not Applicable										
Female											
<b>Total</b>											

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

% of workers covered by

Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		No. (B)	% (B/ A)	No. (C)	% (C/ A)	No. (D)	% (D/ A)	No. (E)	% (E/ A)	No. (F)	% (F/ A)
<b>Permanent workers</b>											
Male	Not Applicable										
Female											
<b>Total</b>											
<b>Other than Permanent workers</b>											
Male	450	Not Applicable									
Female	83										
<b>Total</b>	<b>533</b>										



## 2. Details of retirement benefits, for Current FY and Previous FY.

Benefits	FY 2022-23			FY 2021-22		
	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 employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/ N/ N.A.)
PF	38.48%	100%	Y	38.25%	100%	Y
Gratuity	100%	-	NA	100%	-	NA
ESI	6.13%	-	Y	17.74%	-	Y

Note: OMAXE does not have any 'Other than Permanent' employees. Hence, in all the sections, details sought for 'Other than Permanent' employee category are not applicable to OMAXE.

## 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.

Yes, most of the premises/offices of the Company are accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016. However certain old office buildings are not fully equipped with such facilities, though the Company's endeavor on all existing offices and new offices is to provide such facility, to the extent possible.

## 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, a section of HR manual defines the equal opportunity policy of the company, i.e. Omaxe considers its staff its most important assets and devotes considerable resources towards ensuring their well-being and the establishment of a productive environment. Omaxe is an 'equal opportunity employer' that is committed to hiring staff regardless of gender, race, creed, marital status, or national origin. Omaxe actively strives to attract, retain and develop staff of the highest quality. The Company will strive to provide a fair and equitable treatment to its staff, encourage opportunities for personal growth, discourage all forms of discrimination, provide a safe and well-equipped environment and most importantly, provide opportunity for staff participation in matters that affect the staff and their work.

## 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%	There are no permanent workers in Omaxe Limited	
Female	100%	100%		
<b>Total</b>	100%	100%		

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

	Y/ N (If Yes, then give details of the mechanism in brief)
Permanent Workers	Employees and Workers can raise their grievances with their superiors or HR Managers. They can raise their feedback or file complaints on the HR helpline facility. Our whistle blower policy enables employees/workers to communicate their concerns about unethical practices by writing an e-mail.
Other than Permanent Workers	
Permanent Employees	Not Applicable
Other than Permanent Employees	

Note: OMAXE does not have any 'Other than Permanent' employees. Hence, in all the sections, details sought for 'Other than Permanent' employee category are not applicable to OMAXE.

7. Membership of employees and worker in association(s) or Union(s) recognized by the listed entity: As on 31 March 2023, none of the employees of Omaxe were part of any worker association(s) or union(s).

Category	FY 2022-23			FY 2021-22		
	Total employees/workers in respective category (A)	No. of employees/workers in respective category, who are part of association(s) or Union(s) (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(s) (D)	% (D/ C)
<b>Total Permanent Employees</b>	0	0	0	0	0	0
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
<b>Total Permanent Workers</b>	0	0	0	0	0	0
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0

8. Details of training given to employees and workers:

Category	FY 2022-23					FY 2021-22				
	Total (A)	On Health and Safety measures		On Skill upgradation		Total (D)	On Health and Safety measures		On Skill upgradation	
		No. (B)	% (B/ A)	No (C)	% (C/ A)		No. (E)	% (E/ D)	No. (F)	% (F/ D)
<b>Employees</b>										
Male	429	429	100%	429	100%	423	423	100%	423	100%
Female	44	44	100%	44	100%	45	45	100%	45	100%
<b>Total</b>	<b>473</b>	<b>473</b>	<b>100%</b>	<b>473</b>	<b>100%</b>	<b>468</b>	<b>468</b>	<b>100%</b>	<b>468</b>	<b>100%</b>
<b>Workers</b>										
Male	450	450	100%	450	100%	437	437	100%	437	100%
Female	83	83	100%	83	100%	87	87	100%	87	100%
<b>Total</b>	<b>533</b>	<b>533</b>	<b>100%</b>	<b>533</b>	<b>100%</b>	<b>524</b>	<b>524</b>	<b>100%</b>	<b>524</b>	<b>100%</b>

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. (B)	% (B/ A)	Total (C)	No. (D)	% (D/ C)
<b>Employees</b>						
Male	429	429	100%	421	421	100%
Female	44	44	100%	47	47	100%
<b>Total</b>	<b>473</b>	<b>473</b>	<b>100%</b>	<b>468</b>	<b>468</b>	<b>100%</b>
<b>Workers</b>						
Male	450	450	100%	437	437	100%
Female	83	83	100%	87	87	100%
<b>Total</b>	<b>533</b>	<b>533</b>	<b>100%</b>	<b>524</b>	<b>524</b>	<b>100%</b>

Note: Certain employees were not eligible for annual performance review based on their date of joining. All eligible employees as on the date of FY ending, have received performance and career development reviews.

**10. Health and safety management system:**

- a. Whether an occupational health and safety management system has been implemented by the entity? (Y/ N). If yes, the coverage of such system?**

Yes, Omaxe has implemented an occupational health and safety management system. It covers the entire business including project sites, managed assets (operational premises) and the hospitality division.

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

Omaxe staying up-to-date to control risks and adapting to modern demands is one idea we are adhering to for risk control that can keep workplace safety measures in place. Two different sorts of monitoring techniques are used by Omaxe to inspect the workplace. One is active monitoring, which help us to keep track of how management arrangements are created, developed, installed and used. We regularly audit our facilities, including our offices and projects. We do routine health surveillance to spot risks and get rid of those that are bad for health.

Omaxe takes a systematic and coordinated approach to managing workplace risks. We use risk assessment to identify and eliminate risks and we prefer hierarchy to prioritize measures to combat risks. We also use engineering controls and collective measures to minimize risks.

- c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/ N).**

Yes, OMAXE has a well-defined Standard Operating Procedure (SOP) for incident reporting, classification and investigation for any incidents related to health and safety.

- d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Y/ N).**

**Yes, OMAXE provides access to non-occupational medical and healthcare services to employees, such as:**

1. Every project is equipped with emergency handling equipment and first-aid to handle any occupational or non-occupational injuries and illnesses;
2. Trainings are organized periodically through HR facilitations on promoting good health and well-being;
3. All employees are covered under health insurance.

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

Safety Incident/ Number	Category	FY 2022-23	FY 2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	NIL	NIL
	Workers	NIL	NIL
Total recordable work-related injuries	Employees	NIL	NIL
	Workers	NIL	NIL
No. of fatalities	Employees	NIL	NIL
	Workers	NIL	NIL
High consequence work-related injury or ill-health (excluding fatalities)	Employees	NIL	NIL
	Workers	NIL	NIL

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

OMAXE upholds health, safety and security as a core value in the conduct of its business and is committed to creating a zero-harm workplace i.e. zero lost-time injuries or fatalities, each year. Measures to ensure a safe and healthy workplace include periodic health surveillance, trainings for management, employees and contractors, and periodic review by senior management.

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

	FY 2022-23			FY 2021-22		
	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	-	0	0	-
Health & Safety	0	0	-	0	0	-

**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	Nil
Working Conditions	Nil

**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.**

There were no major safety related incidents or concerns arising from health and safety assessments.

**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)?

(A) Employees: Employees are covered in Group Accidental Insurance.

(B) Workers: Workers are covered in Group Accidental Insurance.

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

Company adheres by all the statutory compliance as applicable under various Statutory Laws and same is applicable to the Value chain partners as well. The records are verified based on the periodic audit process within the internal audit team.

**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 are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:**

Safety Incident/ Number	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable or whose family members have been placed in suitable employment	
	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
<b>Employees</b>	Nil	Nil	Nil	Nil
<b>Workers</b>	Nil	Nil	Nil	Nil

4. Does the entity provide transition assistance programmes to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Y/ N).

No

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 practices	Not Applicable
Working Conditions	Not Applicable

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.

Not Applicable

**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.

At Omaxe, stakeholder engagement is an integral part of its operations. The Company's objective is to create long-term sustainable value for all the stakeholders associated with its business, including investors, employees, customers, suppliers and business partners, Government and communities. To this end, it is vital for Omaxe to develop an understanding of the stakeholders' needs, concerns and expectations. Omaxe strives to achieve this through effective collaboration and regular interaction with all its key stakeholder groups.

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 & Marginalized Group (Y/ N)	Channels of communication (E-mail, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others)	Purpose and scope of engagement including key Topics and Concerns raised during such engagement
Customers	No	<ul style="list-style-type: none"> <li>E-mails</li> <li>Direct customer calls</li> <li>Advertisements</li> <li>Press calls through empaneled channel partners</li> <li>Customer satisfaction surveys</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Product launch awareness;</li> <li>Customer service delivery;</li> <li>Seeking customer feedback; and</li> <li>Customer query and complaint resolution.</li> </ul>
Investors and Shareholders	No	<ul style="list-style-type: none"> <li>Annual General Meetings</li> <li>Periodic disclosures including Quarterly Financial Results</li> <li>Press releases and newsletters</li> <li>Corporate Announcements uploaded on Stock Exchanges Websites and Company's Website</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Economic performance and growth;</li> <li>Shareholders awareness on business developments;</li> <li>Key risks related to the Company such as competition and market risk; and</li> <li>Ensuring regulatory compliance.</li> </ul>
Suppliers and Contractors	No	<ul style="list-style-type: none"> <li>E-mails</li> <li>Phone calls</li> <li>Meetings</li> </ul>	Others – depending on the project requirements	<ul style="list-style-type: none"> <li>Timely delivery of material and work completion;</li> <li>Enhancing the deployment of resources and manpower;</li> <li>Timely payment issues (if any);</li> <li>Issuing of contract amendments (if any);</li> <li>Ensuring regulatory compliance.</li> </ul>
Employees	No	<ul style="list-style-type: none"> <li>Employee newsletters</li> <li>Intranet portal</li> <li>E-mail and other written communication</li> <li>Performance review meetings</li> <li>Various functional committee meetings</li> <li>Cultural events</li> <li>Offsites</li> <li>Skip Meetings</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Keep employees updated on organizational goals, vision, mission and objectives and also align with the business plans;</li> <li>Learning and development;</li> <li>Career advancement opportunities;</li> <li>Health and safety;</li> <li>Transparent communication and grievance redressal;</li> <li>Performance evaluation; and</li> <li>Rewards and Recognition.</li> <li>Ensuring regulatory compliance.</li> </ul>

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Y/ N)	Channels of communication (E-mail, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others)	Purpose and scope of engagement including key Topics and Concerns raised during such engagement
Regulatory Bodies	No	<ul style="list-style-type: none"> <li>Electronic and physical correspondence with regulatory bodies</li> <li>Face to face meetings</li> <li>Through industry chambers</li> <li>Annual Report</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Regulatory compliance;</li> <li>CSR activities and compliance of spending; and</li> <li>Deliberations and inputs on regulations and policies that have bearing on OMAXE's operations and businesses.</li> </ul>
Communities	Yes	<ul style="list-style-type: none"> <li>Direct engagement via field visits and community meetings undertaken by OMAXE Foundation along with the Company's CSR project implementation partners (NGO) and their community mobilizers as part of CSR programmes</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Need assessments;</li> <li>CSR programmes and remedial benefits to the beneficiaries;</li> <li>CSR programme monitoring, evaluation and impact assessment; and</li> <li>Programme Updates.</li> </ul>

### 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.**

Omaxe, periodically undertakes consultation with key internal and external stakeholders as part of the materiality assessment exercise. This is aimed at identifying and re-evaluating material economic, environmental and social topics relevant for its business. The process has been delegated by the Board to the management.

- 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.**

Not Applicable

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

Not Applicable

**PRINCIPLE 5: Businesses should respect and promote human rights**

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. of employees/ workers covered (B)	% (B/ A)	Total (C)	No. of employees/ workers covered (D)	% (D/ C)
<b>Employees</b>						
Permanent*	473	473	100%	468	468	100%
Other than Permanent	0	0	0	0	0	0
<b>Total Employees</b>	<b>473</b>	<b>473</b>	<b>100%</b>	<b>468</b>	<b>468</b>	<b>100%</b>
<b>Workers</b>						
Permanent	0	0	0	0	0	0
Other than Permanent	533	533	100%	524	524	100%
<b>Total Workers</b>	<b>533</b>	<b>533</b>	<b>100%</b>	<b>524</b>	<b>524</b>	<b>100%</b>

\*Note: All employees are provided with training on Code of Conduct of the Company and Prevention of Sexual Harassment (PoSH), which covers human rights related aspects.

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

Category	FY 2022-23					FY 2021-22				
	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)
<b>Employees</b>										
Permanent										
Male	429	-	-	429	100%	421	-	-	421	100%
Female	44	-	-	44	100%	47	-	-	47	100%
Other than Permanent										
Male	Not Applicable									
Female	Not Applicable									
<b>Workers</b>										
Permanent										
Male	Not Applicable									
Female	Not Applicable									
Other than Permanent										
Male	450	-	-	450	100%	437	-	-	437	100%
Female	83	-	-	83	100%	87	-	-	87	100%



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

Category	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (₹ in lakhs per annum)	Number	Median remuneration/ salary/ wages of respective category (₹ in lakhs per annum)
Board of Directors (BoDs)	5	50.00	1	5.65
Key Managerial Personnel (KMPs)	3	35.36	0	0.00
Employees other than BoDs and KMPs	426	6.00	44	5.76
Workers	450	1.26	83	1.20

**4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Y/ N).**

Yes.

OMAXE has a formal mechanism that allows for reporting and remediation of all human rights related issues through its Whistle Blower Policy. This allows all stakeholders including employees, suppliers, customers and vendors to report any human right-related concerns. Through this mechanism, OMAXE provides the necessary safeguards to all complainants for making disclosures in good faith.

In addition, OMAXE has an Internal Complaints Committee (ICC) that is responsible for addressing any incidents and complaints related to sexual harassment.

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

OMAXE has a formal mechanism that allows for reporting and remediation of all human rights related issues through its Whistle Blower Policy. This allows all stakeholders including employees, suppliers, customers and vendors to report any human right-related concerns. Through this mechanism, OMAXE provides the necessary safeguards to all complainants for making disclosures in good faith.

In addition, OMAXE has an ICC that is responsible for addressing any incidents and complaints related to sexual harassment. All such incidents can be reported to the ICC as per the process defined in OMAXE's Policy on Prevention of Sexual Harassment.

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

Complaints	FY 2022-23			FY 2021-22		
	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	-	0	0	-
Discrimination at workplace	0	0	-	0	0	-
Child Labour	0	0	-	0	0	-
Forced Labour/ Involuntary Labour	0	0	-	0	0	-
Wages	0	0	-	0	0	-
Other Human Rights related issues	0	0	-	0	0	-

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

Omaxe's Whistle Blower Policy allows employees, contractors and vendors to report any human rights related concerns or complaints without fear of retaliation. The policy provides necessary safeguards to all complainants for making disclosures in good faith, through specific guidelines to ensure the protection of the complainant:

- a) The identity of the complainant is kept confidential at all times, except during the course of any legal proceedings, where a disclosure/ statement is required to be filed to meet the specific requirement of Statutory Bodies;
- b) The Company, as a policy, strongly condemns any kind of discrimination, harassment or any other unfair employment practice being adopted against the complainant and full protection is granted to him/ her against any reprisal including but not limited to:
  - (i) Unfair employment practices such as threat or intimidation of termination/ suspension of services;
  - (ii) Disciplinary action including transfer, demotion, refusal of promotion; and
  - (iii) Direct or indirect abuse of authority to obstruct the complainant's right to continue performance of his duties during routine daily operations.

**8. Do human rights requirements form part of your business agreements and contracts? (Y/ N).**

Yes.

The terms of contract signed with the value chain partners (including suppliers, contractors, service providers and other business partners), includes human rights related requirements.

**9. Assessments for the year:**

Complaints	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	Nil
Forced/ involuntary labour	Nil
Sexual harassment	Nil
Discrimination at workplace	Nil
Wages	Nil

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

No significant risks or concerns were identified from assessments on human rights related issues.

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

There have been no significant human rights related concerns or grievances. However, Omaxe has strengthened its procedures to address any potential human rights related risks in owned operations and in the value chain. The Company has a General Conditions of Contract/ Supplier Code of Conduct with human rights related guidelines for all value chain partners, (including suppliers, contractors, vendors, service providers and other business partners). Further, the critical suppliers including contractors engaged in construction of its portfolio, are evaluated on their employment practices, to prevent any potential human rights issues or violations in its supply chain.

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

Omaxe internally monitors compliances to all relevant laws and policies pertaining to human rights issues, across entire operations.

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?

Most of the premises/ offices of Omaxe are accessible to differently abled individuals, as per the requirements of the Rights of Persons with Disabilities Act, 2016. OMAXE has thoroughly implemented various measures to ensure accessibility, safety and convenience for persons with disability in all of its new offices/ premises. Further, requisite steps are being undertaken in its existing offices/ premises to align with the requirements of the applicable regulatory provisions.

## 3. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed <sup>10</sup>
Sexual Harassment	Nil
Discrimination at workplace	Nil
Child Labour	Nil
Forced Labour/ Involuntary Labour	Nil
Wages	Nil

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

No significant risks or concerns were identified from assessments of value chain partners on human rights related issues.

## 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	FY 2022-23	FY 2021-22
Total electricity consumption (A) [in Gigajoules (GJ)]	7329.98	4346.05
Total fuel consumption (B) (in GJ)	2402.13	1696.88
Energy consumption through other sources (C) (in GJ)	-	-
Total energy consumption (A+B+C) (in GJ)	9732.11	6042.93
Energy intensity per rupee of turnover (Total energy consumption in GJ/ turnover in rupees)	0.00	0.00
Energy intensity per area of total portfolio [Total energy consumption in GJ/ area of portfolio (including total leasable and saleable area) in sq. mtr.]	0.00	0.00

\*The aforesaid figures are on approximation basis. However, we are in process of re-evaluating our existing sustainability standards and setting the goals and targets in line with the NGRBC/ GRI framework.

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

No.

#### 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.

Not Applicable.

**3. Details of the following disclosures related to water, in the following format\*:**

Parameter	FY 2022-23	FY 2021-22
<b>Water withdrawal by source [in kiloliters (KL)]</b>		
(i) Surface water	-	-
(ii) Groundwater	11662.30	7486.43
(iii) Third party water	-	-
(iv) Seawater/ desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kiloliters) (i+ii+iii+iv+v)</b>	11662.30	7486.43
<b>Total volume of water consumption (in kiloliters)</b>	11662.30	7486.43
Water intensity per rupee of turnover (Water consumed in KL/ turnover in rupees)	0.00	0.00
Water intensity per area of total portfolio [Total water consumption in KL/ area of portfolio (including total leasable and saleable area) in sq. mtr.]	0.00	0.00

\*The aforesaid figures are on approximation basis. However, we are in process of re-evaluating our existing sustainability standards and setting the goals and targets in line with the NGRBC/ GRI framework.

**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.**

No.

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

Treated wastewater from our projects are recycled for flushing and reused for irrigation purposes in the landscaped areas of the projects. Excess treated water is also being used for construction purposes, Avenue plantations and also sold to third party vendors for further use.

**5. Details of air emissions (other than GHG emissions) by the entity, in the following format:**

**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.**

No

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

Parameter	Unit	FY 2022-23	FY 2021-22
<b>Total Scope 1 emissions</b>	Metric tonnes of CO2 equivalent	Not Applicable	
<b>Total Scope 2 emissions</b>	Metric tonnes of CO2 equivalent		
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b>	Metric tonnes of CO2 equivalent per rupee of turnover		
<b>Total Scope 1 and Scope 2 emissions per area of total portfolio</b>	Metric tonnes of CO2 equivalent per square metre of portfolio (including total leasable and saleable area in sq. mtr.)		

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.

No.

**7. Does the entity have any project related to reducing Green House Gas emission? If yes, then provide details.**

The Company does not have a dedicated project related to reducing Green House Gas emissions.

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

Parameter	FY 2022-23*	FY 2021-22*
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste <b>(A)</b>	-	-
E-waste <b>(B)</b>	-	-
Bio-medical waste <b>(C)</b>	-	-
Construction and demolition waste <b>(D)</b>	-	-
Battery waste <b>(E)</b>	-	-
Radioactive waste <b>(F)</b>	-	-
<b>Other Hazardous waste (G)</b>		
(i) Used Lube Oil	-	-
(ii) Others (used DG Filters, Cotton waste and cooking oil)	-	-
<b>Other Non-hazardous waste generated (H)</b>		
(i) Paper Waste	-	-
(ii) Scrap Metal	-	-
(iii) Organic Waste	-	-
(iv) Miscellaneous	-	-
<b>Total (A+B+C+D+E+F+G+H)</b>	-	-
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	-	-
(ii) Re-used	-	-

\* The Company is engaged in the business of real estate and do not operate any factory and do not significantly use such materials.

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.

No

**9. 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.**

The Company is engaged in the business of real estate and do not operate any factory and do not significantly use such materials. The Hazardous waste, if any, is handed over to authorized recyclers.

10. 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, specify details in the following format:

S.No.	Location of operations/ offices	Type of operations	Whether the conditions of environmental approval/ clearance are being complied with? (Y/ N) If no, the reasons thereof and corrective action taken, if any.
Not Applicable			

11. 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 (Y/ N)	Results communicated in public domain (Y/ N)	Relevant Web link
Not Applicable					

\* We are in the process of re-evaluating our existing sustainability standards and setting the goals and targets in line with the NGRBC/ GRI framework.

12. 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, OMAXE is compliant with all applicable environmental laws, regulations and guidelines in India.

S. No.	Specify the law/ regulation/ guidelines which was not complied with	Provide details of the non-compliance	Any fines/ penalties/ action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken if any
Not Applicable				

#### Leadership Indicators

1. Break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format\*:

Parameter	FY 2022-23	FY 2021-22
<b>From renewable sources</b>		
Total electricity consumption (A) (in GJ)	-	-
Total fuel consumption (B) (in GJ)	-	-
Energy consumption through other sources (C) (in GJ)	-	-
<b>Total energy consumed from renewable sources (A+B+C) (in GJ)</b>	-	-
<b>From non-renewable sources</b>		
Total electricity consumption (D) (in GJ)	-	-
Total fuel consumption (E) (in GJ)	-	-
Energy consumption through other sources (F) (in GJ)	-	-
<b>Total energy consumed from non-renewable sources (D+E+F) (in GJ)</b>	-	-

\* We are in the process of re-evaluating our existing sustainability standards and setting the goals and targets in line with the NGRBC/ GRI framework.

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.

No.

**2. Provide the following details related to water discharged:\***

Parameter	FY 2022-23	FY 2021-22
<b>Water discharge by destination and level of treatment [in kiloliters(KL)]:</b>		
(i) To Surface water	-	-
- No treatment	-	-
- With treatment – specify level of Treatment	-	-
(ii) To Groundwater	-	-
- No treatment	-	-
- With treatment – specify level of Treatment	-	-
(iii) To Seawater	-	-
- No treatment	-	-
- With treatment – specify level of Treatment	-	-

\* We are in the process of re-evaluating our existing sustainability standards and setting the goals and targets in line with the NGRBC/ GRI framework.

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.

No.

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

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

- Name of the area
- Nature of operations
- Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2022-23	FY 2021-22
<b>Water withdrawal by source [in kilolitres (KL)]:</b>		
(i) Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	-	-
(iv) Seawater/ desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kilolitres)</b>	-	-
<b>Total volume of water consumption (in kilolitres)</b>	-	-
<b>Water intensity per rupee of turnover</b> (Water consumed in KL/ turnover in rupees)	-	-
<b>Water intensity per area of total portfolio</b> [Total water consumption in KL/ area of portfolio (including total leasable and saleable area) in sq. mtr.]	-	-
<b>Water discharge by destination and level of treatment [in kilolitres (KL)]:</b>		
(i) Into Surface water	-	-
- No treatment	-	-
- With treatment – specify level of treatment	-	-
(ii) Into Groundwater	-	-
- No treatment	-	-

Parameter	FY 2022-23	FY 2021-22
- With treatment – specify level of treatment	-	-
(iii) Into Seawater	-	-
- No treatment	-	-
- With treatment – specify level of treatment	-	-
(iv) Sent to third-parties	-	-
- No treatment	-	-
- With treatment– specify level of treatment	-	-
(v) Others	-	-
- No treatment	-	-
- With treatment– specify level of treatment	-	-
Total water discharged (in kilolitres)	-	-

\* We are in the process of re-evaluating our existing sustainability standards and setting the goals and targets in line with the NGRBC/ GRI framework.

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.

No.

#### 4. Details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	N.A.	N.A.
Total Scope 3 emissions per rupee of turnover		N.A.	N.A.
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity		N.A.	N.A.

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.

No.

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

Not Applicable.

#### 6. 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, 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
Not Applicable			

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

Yes, Omaxe has a business continuity plan in place to address any emergency situations in its operations, including both construction activities as well as operation and maintenance of its portfolio. These emergencies are identified as natural disasters and human caused disasters such as fire incidents, gas leakage, earthquake, flood, cyclone, power blackout, terrorist attacks, bomb threats, civil unrest, food poisoning and epidemics.



**8. 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?**

There has been no significant adverse impacts to the environment arising from any of the OMAXE's projects. The Company promotes responsible development practices through ensuring compliance to all applicable regulatory requirements, incorporating climate resilient building design in its portfolio, promoting the use of renewables for energy generation and procuring sustainable construction material. Any potential environmental impact is identified and assessed at the time of project planning and preventive or mitigative measures are undertaken accordingly.

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

100% of the critical value chain partners including contractors and vendors engaged in construction of the projects and FM Partners engaged in management of the rental properties are evaluated on environmental parameters.

**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.**

Omaxe has affiliations with 5 trade and industry chambers/ associations, including national and state level associations. It constantly engages with these trade bodies to advocate sector specific policy reforms and improved transparency and governance.

b. List the top 5 trade and industry chambers/ associations (determined based on the total members of such 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	PHD Chamber of Commerce and Industry (PHDCCI)	National
2	CREDAI	State
3	Federation of Indian Chambers of Commerce and Industry (FICCI)	National
4	National Real Estate Development Council (NAREDCO)	National
5	The Associated Chambers of Commerce and Industry of India (ASSOCHAM)	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.**

There were no incidents of anti-competitive conduct by Omaxe during FY 2022-23, hence this is not applicable.

Name of authority	Brief of the case	Corrective action taken
Not Applicable		

**Leadership Indicators**

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

S.No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Y/ N)	Frequency of review by Board (Annually/ Half yearly/ Quarterly/ Others)	Web Link, if available
Nil					

**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 FY.**

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Y/ N)	Results communicated in public domain (Y/ N)	Relevant Web Link
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Not Applicable

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

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
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Not Applicable

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

Omaxe engages with community members through its social arm - OMAXE Foundation. In addition, OMAXE is closely connected with community members through its CSR programmes. The respective programme team engages with the community stakeholders to receive and redress concerns of the communities.

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

	FY 2022-23	FY 2021-22
Directly sourced from MSMEs/ small producers*	-	-
Sourced directly from within the district and neighboring districts#	-	-

\* We always thrive to procure raw materials from MSME vendors, to the extent possible.

# The operations of the Company are based PAN India, hence, these expenditures are not separable and not provided separately. However, we are in process of re-evaluating our existing sustainability standards and setting the goals and targets in line with the NGRBC/ GRI framework.

**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):**

Details of negative social impact identified	Corrective action taken
----------------------------------------------	-------------------------

Not Applicable

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

S. No.	State	Aspirational District	Amount spent (In INR)
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Not Applicable

3. (a) **Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/ vulnerable groups? (Y/ N).**

No.

**(b) From which marginalized/ 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 FY), based on traditional knowledge:**

Not applicable. OMAXE does not have any intellectual properties owned or acquired based on traditional knowledge.

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Y/ N)	Benefit shared (Y/ N)	Basis of calculating benefit share
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.**

Name of authority	Brief of the Case	Corrective action taken
Not Applicable		

**6. Details of beneficiaries of CSR Projects:**

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
Not Applicable.			

**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.**

Customer feedback, questions and complaints are handled in a transparent and timely manner. A dedicated team of qualified Customer Relationship Management (CRM) personnel have been appointed to address each complaint. This mechanism is communicated via the contact no./ e-mail through the very first letter of correspondence with a newly on-boarded customer.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	NA
Safe and responsible usage	NA
Recycling and/ or safe disposal	NA

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

	FY 2022-23			FY 2021-22		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	Nil	-	Nil	Nil	-
Advertising	Nil	Nil	-	Nil	Nil	-
Cyber-security	Nil	Nil	-	Nil	Nil	-
Delivery of essential services	Nil	Nil	-	Nil	Nil	-
Restrictive Trade Practices	Nil	Nil	-	Nil	Nil	-
Unfair Trade Practices	Nil	Nil	-	Nil	Nil	-
Other	Nil	Nil	-	Nil	Nil	-

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

	Number	Reasons for recall
Voluntary recalls	Not Applicable	
Forced recalls		

Due to nature of business of OMAXE, product recalls on account of safety issues is not applicable.

**5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Y/ N). If available, provide a web-link of the policy.**

Yes, OMAXE has an Information Security Policy supported by management procedures that are aimed at achieving and sustaining enterprise- level information security objectives. Ensuring security of information, like any other business asset, is one of the key priorities in the business processes, to prevent any theft, tampering, misuse and unauthorized access. OMAXE constantly deploys appropriate technology, processes, resources and infrastructure for timely implementation of security controls that comply with applicable laws and incorporate leading industry practices.

The Company has established procedures to ensure data privacy of its customers, employees and other stakeholders. It only collects customer information which is essential for the purpose of providing the product or service. The collected data is protected through regular security upgrades and adequate employee training is provided to ensure safeguarding of sensitive information. The risk management policy of the Company is available at <https://www.omaxe.com/investors/other-disclosures-under-sebi-regulations/Other%20Codes%20&%20Policies/Policy%20on%20Risk%20Management.pdf>.

**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.**

NA

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

Details of all the products and services are provided on the Company's website at <https://www.omaxe.com>

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

Consumers are informed about the safe and responsible usage of OMAXE's buildings through various measures undertaken at the time of building handover, as well as during operation and maintenance.

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

Any risk of disruption/ discontinuation of essential services is timely communicated to customers occupying the leased properties, through e-mail communication by the CRM Teams.

**4. Does the entity display product information on the product over and above what is mandated as per local laws? (Y/ N/ Not Applicable). If yes, provide details in brief.**

Yes, the entity displays the information about the product and its various features within the product. The Company is bound by RERA however the product brochures also inform the customer about the sustainability features and the related customer benefits. Provision of signage within the product also guides the customers to identify the features and its usage. Customer satisfaction is ensured by having continuous engagement right from the day of possession till society handover, timely response to their grievances and prompt service support. We do take feedback from our customers through customer surveys in which we request the customer to share feedback about their experience of the product, their journey throughout the possession of their flat, etc. These feedbacks provide an opportunity to us to understand the customer pain points and liking of the sustainability and other.

**5. 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.