



# **SANMIT INFRA LIMITED**

## **BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORTING**

**FY 2023-24**

# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

## 2023-24

The Company presents the 'Business Responsibility & Sustainability Report' (BRSR) for FY 2023-24, pursuant to Regulation 34(2) (f) of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015. In an endeavour to go beyond and above the statutory requirements of disclosing and describing the initiatives taken by the Company through this reporting mechanism, the Company feels it is necessary to chart out its journey so far and ahead in alignment with the globally accepted ESG principles like UNSDGs. The data presented in this report for previous years has been rationalised wherever necessary.

In this report, the words – 'The Company', 'Sanmit', 'We', 'Our' are used interchangeably to denote Sanmit Infra Ltd.

### SECTION A: GENERAL DISCLOSURES

#### i. Details of the listed entity:

1. **Corporate Identity Number (CIN) of the Listed Entity** - L70109MH2000PLC288648
2. **Name of the Listed Entity** – Sanmit Infra Limited
3. **Year of incorporation** - 2000
4. **Registered office address** – 601, MAKHIJA ROYALE, 6TH FLOOR, S.V. ROAD, Khar (W) Mumbai Mumbai City MH 400052 IN
5. **Corporate address** – 601, MAKHIJA ROYALE, 6TH FLOOR, S.V. ROAD, Khar (W) Mumbai Mumbai City MH 400052 IN
6. **E-mail** – info@sanmitinfra.com, sanmitinfra@gmail.com
7. **Telephone** - 022-67429100, 022-25557474, 9223400434
8. **Website** - www.sanmitinfra.com
9. **Financial year for which reporting is being done** – 2023-24
10. **Name of the Stock Exchange(s) where shares are listed :**

Name of the Exchange	Stock Code
BSE Ltd.	532435

11. **Paid-up Capital** – INR 15,80,07,500
12. **Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report** –  
Sanjay Makhija  
Ph No: 9223400434  
Email: [sanmitinfra@gmail.com](mailto:sanmitinfra@gmail.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 made under this report are made on a standalone basis for Sanmit Infa Limited.

**14. Name of assurance provider** – Not Applicable for the reporting period as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dt. 12 July, 2023

**15. Type of assurance obtained** – Not Applicable for the reporting period as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dt. 12 July, 2023

**ii. Products/services**

**16. 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
1	Mining and quarrying	Trading of Petroleum Products	82.23
2	Manufacturing	Repair & installation of machinery & equipment, motor vehicles	12.41
3	Manufacturing	Manufacturing of Bitumen Emulsion	5.36

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

S. No.	Product/ Service	NIC Code	% of Turnover contributed
1.	Trading of Petroleum Products	46610	82.23
2.	Repair & installation of machinery & equipment, motor vehicles	33190	12.41
3.	Manufacturing of Bitumen Emulsion	19209	5.36

**iii. Operations**

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

Location	Number of plants	Number of offices	Total
National	3	1	4
International	0	0	0

**19. Markets served by the entity:**

**a. Number of locations**

Locations	Number
National (No. of States & UTs)	2
International (No. of Countries)	0

Note: Markets served at Mumbai and Odisha

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

The Company did not conduct any exports during the reporting year.

**c. A brief on types of customers:**

Sanmit Infra Ltd. caters to diverse customers (B2B), primarily focusing on private limited companies. They specialize in serving the steel industry and providing services to municipal corporations, NHAI-approved contractors, and PWD-approved contractors, among others. Their wide-ranging clients showcases their expertise in infrastructure and construction sectors.

**IV. Employees**

**20. 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)
<b>EMPLOYEES</b>						
1.	Permanent (D)	35	23	65.71	12	34.29
2.	Other than Permanent (E)	10	6	60.00	4	40.00
3.	<b>Total employees (D + E)</b>	45	29	64.44	16	35.56
<b>WORKERS</b>						
4.	Permanent (F)	0	0	0.00	0	0.00
5.	Other than Permanent (G)	8	8	100.00	0	0.00
6.	<b>Total workers (F + G)</b>	8	8	100.00	0	0.00

Note: The Company has not employed any permanent workers during the reporting year.

**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	0	0.00	0	0.00
2.	Other than Permanent (E)	0	0	0.00	0	0.00
3.	<b>Total differently abled employees (D + E)</b>	0	0	0.00	0	0.00
<b>DIFFERENTLY ABLED WORKERS</b>						
4.	Permanent (F)	0	0	0.00	0	0.00
5.	Other than permanent (G)	0	0	0.00	0	0.00
6.	<b>Total differently abled workers (F + G)</b>	0	0	0.00	0	0.00

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

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	8	1	12.50
Key Management Personnel	2	1	50.00

\*KMP includes CFO (Chief Financial Officer) and CS (Company Secretary)

**22. Turnover rate for permanent employees and workers (in percent)**

	FY 2023-24			FY 2022-23			FY 2021-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Permanent Employees</b>	22.73	42.11	28.57	30.00	47.06	35.09	46.15	22.22	38.60
<b>Permanent Workers</b>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**v. Holding, Subsidiary and Associate Companies (including joint ventures)**
**23. (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)
The Company currently does not have any holding, subsidiary, or associate companies.				

**vi. CSR Details**

- 24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes**  
**(ii) Turnover (in Rs.) - 94,21,64,457.85**  
**(iii) Net worth (in Rs.) - 35,67,22,037.97**



**VII. Transparency and Disclosures Compliances**

**25. Complaints/Grievance 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)	FY 2023-24			FY 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
Communities	Yes, the Company has grievance mechanism in place, and the concerned aggrieved can raise the concern by writing to <a href="mailto:INFO@sanmit.com">INFO@sanmit.com</a> .	0	0	NA	0	0	NA
Investors (other than shareholders)	Yes. The SEBI mechanism of SCORES is effectively in place – <a href="https://scores.sebi.gov.in/">https://scores.sebi.gov.in/</a> . Also Investors can write to <a href="mailto:INFO@sanmit.com">INFO@sanmit.com</a> to raise grievances	0	0	NA	0	0	NA
Shareholders	Yes. The SEBI mechanism of SCORES is effectively in place – <a href="https://scores.sebi.gov.in/">https://scores.sebi.gov.in/</a> . Also Shareholders can write to <a href="mailto:INFO@sanmit.com">INFO@sanmit.com</a> to raise grievances	0	0	NA	0	0	NA
Employees and workers	Employees and workers can raise their concerns or grievances	0	0	NA	0	0	NA

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/ No)	FY 2023-24			FY 2022-23		
	through the designated email addresses: <a href="mailto:sanmitinfra@gmail.com">sanmitinfra@gmail.com</a> and <a href="mailto:md@sanmitinfra.com">md@sanmitinfra.com</a> . Employees can also raise their grievances directly to the Directors and senior management.						
Customers	Customers can raise their complaints through <a href="mailto:sanmitinfra@gmail.com">sanmitinfra@gmail.com</a> , or by calling 022-67429100 or 922340043	0	0	NA	0	0	NA
Value Chain Partners	Yes, the Company has grievance mechanism in place, and the concerned aggrieved can raise the concern by writing to <a href="mailto:INFO@sanmit.com">INFO@sanmit.com</a> .	0	0	NA	0	0	NA

**26. Overview of the entity’s material responsible business conduct 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<sup>1</sup>**

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	Waste Management	Risk	The management of biomedical waste poses significant environmental and health risks. Inadequate handling and disposal can lead to environmental contamination and health hazards. Biomedical waste includes potentially hazardous materials that require specialized handling to prevent pollution and health risks. Regulatory compliance and best practices are critical to mitigating these risks.	The Company has implemented comprehensive measures for effective waste management in compliance with regulatory standards. In adherence to the Biomedical Waste Rule, 2016, the Company manufactures advanced microwave disinfection systems featuring ultraviolet radiation (UVR) for hospital waste. This dual-technology system, following successful pilot projects in municipal and railway hospitals, effectively eliminates bacteria and viruses in biomedical waste. Additionally, the Company manages bitumen by purchasing it in drums from importers and transporting it to the Rasayani plant, where it is melted and stored in vertical tanks. The empty drums are then collected by our authorized vendor, M/S Global Trading Company, who reconditions and resells them, ensuring responsible disposal and recycling.	Negative  *There was no negative financial impact for the reporting year 2023-24
2	Workplace Health and Safety	Risk	Ensuring workplace safety is crucial, especially in sectors like biomedical waste management and infrastructure where hazards are prevalent.	The Company is committed to maintain a safe and healthy workplace by implementing stringent safety protocols, conducting regular training sessions, and performing ongoing risk assessments. Prioritizing employee well-being,	Negative  *There was no negative financial impact for the

<sup>1</sup> Material issues identified are referred from the Sustainability Accounting Standards Board (SASB) 2023-24 version. SASB Standards are maintained and enhanced by the International Sustainability Standards Board (ISSB). This follows the SASB's merger with the International Integrated Reporting Council (IIRC) into the Value Reporting Foundation (VRF) and subsequent consolidation into the IFRS® Foundation in 2022



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>the Company ensures a hazard-free environment and adheres to all relevant health and safety regulations. Recognizing the critical importance of safeguarding its employees, we are actively striving to implement a systematic approach that includes ongoing hazard identification and risk assessment. This proactive initiative is aimed at improving safety measures and fostering a safer work environment for their employees.</p>	reporting year 2023-24
3	Labour Practices	Risk	<p>Labour practices encompass various aspects of employee welfare, including fair treatment, accessibility, and avenues for reporting grievances. Poor labour practices or inadequate measures to protect employees' rights can lead to legal issues, decreased employee morale, and reputational damage. For the Company, which operates in sectors with demanding work environments, ensuring robust labour practices is essential to maintain a positive workplace culture and comply with legal standards.</p>	<p>The Company is committed to upholding human rights and fostering a fair and inclusive workplace by implementing several key measures. The Company ensures compliance with all relevant labour laws, providing direct communication channels for employees to report concerns or grievances through designated email addresses and encouraging direct reporting to Directors and senior management. A dedicated Whistle-blower policy allows employees to confidentially report misconduct directly to the Audit Committee, which promptly investigates and addresses confirmed violations. Additionally, the Company has designed its premises to be accessible to employees with disabilities, including wheelchair-friendly ramps and lifts, demonstrating a proactive commitment to inclusivity and accessibility, even though there are currently no differently-abled employees.</p>	<p>Negative</p> <p>*There was no negative financial impact for the reporting year 2023-24</p>

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)
4.	Greenhouse Gas Emission	Risk	Climate change poses significant risks for a petroleum trading and distribution company, particularly through its greenhouse gas (GHG) emissions. These emissions are not only a direct result of the Company's own operations but also occur throughout the value chain, especially given that logistics and distribution are handled by third-party providers. Addressing these emissions is crucial for managing risks, complying with regulations, and seizing opportunities for improvement.	To address climate change risk, the Company will focus on sensitization programs for third-party logistics and distribution partners to encourage and promote sustainable practices. This forward-looking approach aims to enhance the environmental performance of the entire value chain, aligning with global sustainability goals and mitigating associated risks.	Negative  *There was no negative financial impact for the reporting year 2023-24
5.	Changing Economic Scenarios	Opportunity	In the dynamic landscape of global and national economies, the real estate sector and petroleum products trading present significant opportunities for growth and expansion. The evolving economic conditions, such as shifts in government policies, changes in consumer preferences, and economic recovery, can create favourable market conditions for companies operating in these sectors.	Not Applicable	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.

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>										
<b>1. a. Whether your entity's policy/ policies cover each principle and its core elements of the NGRBCs. (Yes/No)</b>		Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
<b>b. Has the policy been approved by the Board? (Yes/No)</b>		Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
<b>c. Web Link of the Policies, if available</b>										
Sr. No.	Name of policy	Link to Policy								Which Principles each policies goes into
1	Risk Management Policy	<a href="https://sanmitinfra.com/wp-content/uploads/2023/08/1.-RISK-MANAGEMENT-POLICY.pdf">https://sanmitinfra.com/wp-content/uploads/2023/08/1.-RISK-MANAGEMENT-POLICY.pdf</a>								P1, P2
2	Nomination & Remuneration Policy	<a href="https://sanmitinfra.com/wp-content/uploads/2023/08/2.-NOMINATION-AND-REMUNERATION-POLICY.pdf">https://sanmitinfra.com/wp-content/uploads/2023/08/2.-NOMINATION-AND-REMUNERATION-POLICY.pdf</a>								P3, P4
3	Dividend distribution policy	<a href="https://sanmitinfra.com/wp-content/uploads/2023/08/3.-DIVIDEND-DISTRIBUTION-POLICY.pdf">https://sanmitinfra.com/wp-content/uploads/2023/08/3.-DIVIDEND-DISTRIBUTION-POLICY.pdf</a>								P3, P4
4	Policy on Related Party Transactions	<a href="https://sanmitinfra.com/wp-content/uploads/2023/08/4.-POLICY-FOR-RELATED-PARTY-TRANSACTION.pdf">https://sanmitinfra.com/wp-content/uploads/2023/08/4.-POLICY-FOR-RELATED-PARTY-TRANSACTION.pdf</a>								P1, P4, P7
5	Familiarization program for Independent Directors	<a href="https://sanmitinfra.com/wp-content/uploads/2023/08/5.-FAMILARIZATION-PROGRAMME-FOR-INDEPENDENT-DIRECTORS.pdf">https://sanmitinfra.com/wp-content/uploads/2023/08/5.-FAMILARIZATION-PROGRAMME-FOR-INDEPENDENT-DIRECTORS.pdf</a>								P1
6	Policy for determining Material Subsidiaries	<a href="https://sanmitinfra.com/wp-content/uploads/2023/08/6.-POLICY-FOR-DETERMINING-MATERIAL-SUBSIDIARIES.pdf">https://sanmitinfra.com/wp-content/uploads/2023/08/6.-POLICY-FOR-DETERMINING-MATERIAL-SUBSIDIARIES.pdf</a>								P1
7	Policy on determination of Materiality of events	<a href="https://sanmitinfra.com/wp-content/uploads/2023/08/7.-POLICY-FOR-DETERMINATION-OF-MATERIAL-EVENTS.pdf">https://sanmitinfra.com/wp-content/uploads/2023/08/7.-POLICY-FOR-DETERMINATION-OF-MATERIAL-EVENTS.pdf</a>								P1, P4
8	Corporate Social Responsibility Policy	<a href="https://sanmitinfra.com/wp-content/uploads/2023/08/8.-CSR-POLICY.pdf">https://sanmitinfra.com/wp-content/uploads/2023/08/8.-CSR-POLICY.pdf</a>								P4, P8
9	Code of Conduct for Non-Executive and Independent Directors	<a href="https://sanmitinfra.com/wp-content/uploads/2023/08/15.CODE-">https://sanmitinfra.com/wp-content/uploads/2023/08/15.CODE-</a>								P1

		<a href="#">OF-CONDUCT-FOR-NON-EXECUTIVE-DIRECTORS.pdf</a>								
10	Code of Conduct for Directors and Senior Management Personnel	<a href="https://sanmitinfraltd.com/wp-content/uploads/2023/08/9.-CODE-OF-CONDUCT-FOR-BOARD-AND-SENIOR-MANAGEMENT-PERSONNEL.pdf">https://sanmitinfraltd.com/wp-content/uploads/2023/08/9.-CODE-OF-CONDUCT-FOR-BOARD-AND-SENIOR-MANAGEMENT-PERSONNEL.pdf</a>	P1							
11	Whistle blower Policy and Vigil Mechanism Policy	<a href="https://sanmitinfraltd.com/wp-content/uploads/2023/08/10.-WHISTLE-BLOWER-POLICY-AND-VIGIL-MECHANISM-POLICY.pdf">https://sanmitinfraltd.com/wp-content/uploads/2023/08/10.-WHISTLE-BLOWER-POLICY-AND-VIGIL-MECHANISM-POLICY.pdf</a>	P1							
12	Human Rights Policy	<a href="https://sanmitinfraltd.com/wp-content/uploads/2023/08/11.-HUMAN-RIGHTS-POLICY.pdf">https://sanmitinfraltd.com/wp-content/uploads/2023/08/11.-HUMAN-RIGHTS-POLICY.pdf</a>	P5							
13	Cyber security and Data Privacy	<a href="https://sanmitinfraltd.com/wp-content/uploads/2023/08/12.-DATA-PRIVACY.pdf">https://sanmitinfraltd.com/wp-content/uploads/2023/08/12.-DATA-PRIVACY.pdf</a>	P9							
14	Archival Policy	<a href="https://sanmitinfraltd.com/wp-content/uploads/2023/08/13.-ARCHIVAL-POLICY.pdf">https://sanmitinfraltd.com/wp-content/uploads/2023/08/13.-ARCHIVAL-POLICY.pdf</a>	P1							
15	Code of Practices and Procedures for Unpublished Price Sensitive Information	<a href="https://sanmitinfraltd.com/wp-content/uploads/2023/08/14.-CODE-OF-CONDUCT-FOR-UNPUBLISHED-PRICE-SENSITIVE-INFORMATION.pdf">https://sanmitinfraltd.com/wp-content/uploads/2023/08/14.-CODE-OF-CONDUCT-FOR-UNPUBLISHED-PRICE-SENSITIVE-INFORMATION.pdf</a>	P1							
16	Policy on the Terms and Conditions of Appointment of Independent Directors	<a href="https://sanmitinfraltd.com/wp-content/uploads/2023/08/16.-TERMS-AND-CONDITIONS-FOR-APPOINTMENT-OF-ID.pdf">https://sanmitinfraltd.com/wp-content/uploads/2023/08/16.-TERMS-AND-CONDITIONS-FOR-APPOINTMENT-OF-ID.pdf</a>	P1							
<b>2. Whether the entity has translated the policy into procedures. (Yes / No)</b>		Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
<b>3. Do the enlisted policies extend to your value chain partners? (Yes/No)</b>		Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
<b>4. Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g.SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.</b>		<p>For our units, we have obtained the following certifications:</p> <ul style="list-style-type: none"> <li>• Rasayani Manufacturing Unit: <ul style="list-style-type: none"> <li>- ISO 9001:2015 (Quality Management Systems),</li> <li>- ISO 45001:2018 (Occupational health and safety management systems),</li> <li>- ISO/IEC 17025:2017 (General requirements for the competence of testing and calibration laboratories)</li> </ul> </li> <li>• Mumbai Corporate Office: <ul style="list-style-type: none"> <li>- ISO 13485:2016 (Medical devices — Quality management systems — Requirements for regulatory purposes)</li> </ul> </li> </ul>								

<b>5. Specific commitments, goals and targets set by the entity with defined timelines, if any.</b>	The Company maintains a systematic approach to improvement and ensures timely renewal of certifications by establishing clear commitments, goals, and targets with defined timelines. These targets serve as a roadmap for monitoring progress and achieving certification renewals within specified periods, fostering continuous professional development and adherence to compliance standards.
<b>6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.</b>	

**Governance, leadership and oversight**

**7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements**

*Sanmit Infra Limited prioritizes sustainability and governance, adhering to ESG principles across all its operations. The Company consistently aims for excellence in environmental performance, promoting a clean and sustainable environment. We are committed to providing reliable and high-quality services to our consumers while upholding our responsibility to create, conserve, and ensure a safe environment for sustainable development. This is achieved by adopting technologies and practices that minimize the environmental impact of our activities. In summary, Sanmit Infra Limited is dedicated to fulfilling its corporate social responsibilities and strives to bring about comprehensive improvements in the communities surrounding our project sites for the benefit of all.*

- Mr. Sanjay Makhija  
Managing Director

<b>8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</b>	Mr. Sanjay Makhija Managing Director
<b>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.</b>	Yes, the Company has formed Business Responsibility and Sustainability Committee headed by Mr. Sanjay Makhija, Managing Director and meetings are held to discuss matters and detailing related to the Business Responsibility and Sustainability Report for an ethical and transparent disclosure.

**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
<b>Performance against above policies and follow up action</b>	The Company diligently tracks and evaluates performance against its policies. Regular follow-up actions are taken to ensure continuous improvement and alignment with the Company's commitments.	Need Basis																	

<b>Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances</b>	The Company Complies with all statutory requirements	Need Basis
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	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>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.</b>	Yes, Dhir & Dhir Associates, an eminent legal firm, conducted an evaluation to assess the implementation and effectiveness of policies. The evaluation primarily focused on the effectiveness of policy execution. Moreover, the policies undergo periodic evaluations and revisions led by department heads and business heads, followed by approval from the management or board.								

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>The entity does not consider the Principles material to its business (Yes/No)</b>	NA	NA	NA	NA	NA	No	NA	NA	NA
<b>The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)</b>	NA	NA	NA	NA	NA	No	NA	NA	NA
<b>The entity does not have the financial or/human and technical resources available for the task (Yes/No)</b>	NA	NA	NA	NA	NA	No	NA	NA	NA
<b>It is planned to be done in the next financial year (Yes/No)</b>	NA	NA	NA	NA	NA	Yes	NA	NA	NA



## 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.**

<b>Essential Indicators</b>
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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	2	During the year, Board members and KMPs were apprised of various updates pertaining to business, regulatory, safety matters, etc.	100.00
Key Managerial Personnel	2		100.00
Employees other than BoD and KMPs	2	With an objective of creating awareness among employees and workers of the group on various principles, the Company conducted training programmes on topics like Code of Conduct, Knowledge and Significance of Ethics and Integrity at Workplace, Health and Wellness, Safety awareness.	100.00
Workers	1		100.00

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 (basis the 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	The Company did not incur any fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by				
Settlement					

Compounding Fee	directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year.
<b>Non-Monetary</b>	
Imprisonment Punishment	The Company did not incur any 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.

**Note:** The Company, its Directors and/or KMPs have not been subjected to any thresholds of the materiality policy to pay any fines, penalties, punishments, awards, compounding fees, or settlement amounts in the financial year

**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 the regulatory/enforcement agencies/judicial institutions
NIL	

**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 is committed to ethical practices and transparency in all its operations. Our Code of Conduct includes a clause on fair dealing that underscores our commitment to these principles. This clause reflects our focus on maintaining integrity, fairness, and accountability in all business dealings. By embedding these values into our Code of Conduct, we aim to ensure that all employees and stakeholders adhere to the highest standards of ethical behavior and conduct.

The Code of Conduct is accessible via - <https://sanmitinfra.com/wp-content/uploads/2023/08/9.-CODE-OF-CONDUCT-FOR-BOARD-AND-SENIOR-MANAGEMENT-PERSONNEL.pdf>

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

	FY 2023-24	FY 2022-23
<b>Directors</b>	Nil. No disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption against any of our Directors/KMPs/Employees/Workers in the reporting years.	
<b>KMPs</b>		
<b>Employees</b>		
<b>Workers</b>		

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

	FY 2023-24		FY 2022-23	
	Number	Remarks	Number	Remarks
<b>Number of complaints received in relation to issues of conflict of interest of the Directors</b>	0	NA	0	NA

<b>Number of complaints received in relation to issues of Conflict of Interest of the KMPs</b>	0	NA	0	NA
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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:

	<b>FY 2023-24</b>	<b>FY 2022-23</b>
<b>Number of days of accounts payables</b>	73.73	53.05

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:

<b>Parameter</b>	<b>Metrics</b>	<b>FY 2023-24</b>	<b>FY 2022-23</b>
<b>Concentration of Purchases</b>	a. Purchases from Trading houses as % of total purchases	0.00	0.00
	b. Number of trading houses where purchases and made from	0	0
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0.00	0.00
<b>Concentration of Sales</b>	a. Sales to dealers/distributors as % of total sales	10.77	3.03
	b. Number of dealers/distributors to whom sales are made	2	1
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers/ distributors	10.77	3.03
<b>Share of RPTs in</b>	a. Purchases (Purchases with related parties/Total Purchases)	16.01	0.16
	b. Sales (Sales to related parties/Total Sales)	25.69	0.07
	c. Loans & advances (Loans & advances given to related parties/Total loans & advances)	0.00	0.00

	<b>d. Investments (Investments in related parties/Total Investments made)</b>	0.00	0.00
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<b>Leadership Indicators</b>
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1. **Awareness programmes conducted for value chain partners on any of the Principles during the financial year:**

Total number of awareness programmes held	Topic/principles covered under the training	% age of value chain partners covered (by value of business done with such partners) that were assessed
The Company currently has not conducted any awareness programmes for their value chain partners, however will conduct the same in the coming years		

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 established procedures to prevent and address conflicts of interest among Board members. Their detailed code of conduct provides clear guidelines and protocols for managing potential conflicts, ensuring that decisions and actions are made impartially and in the best interests of the Company and its stakeholders.

The Code of Conduct is accessible via - <https://sanmitinfra.com/wp-content/uploads/2023/08/9.-CODE-OF-CONDUCT-FOR-BOARD-AND-SENIOR-MANAGEMENT-PERSONNEL.pdf>

**PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe**

<b>Essential Indicators</b>
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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
<b>R&amp;D</b>	The Company has not made R&D or capex investments focused on improving environmental and social impacts in this reporting year. However, we plan to explore and allocate resources for such investments in the future, aligning with our commitment to sustainability and enhancing our positive contributions to society.		
<b>Capex</b>			

2. **a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)**

Currently, the Company does not have procedures for sustainable sourcing. However, we are actively exploring and working towards implementing sustainable sourcing practices to strengthen our commitment to environmental responsibility.

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

Not Applicable

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.**

The Company currently does not have specific processes in place for safely reclaiming products for reusing, recycling, and disposing of them at the end of life for plastics, e-waste, hazardous waste, or other waste.

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.**

Considering the Company's Business operations, EPR is not applicable to the Company as per CPCB (Central Pollution Control Board)'s regulations.

<b>Leadership Indicators</b>
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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?

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 (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
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Currently, the Company does not conduct LCA for its services. The Company shall review & consider the same in the future.

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 2023-24	FY 2022-23
NIL	NIL	NIL

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:

	FY 2023-24			FY 2022-23		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging) E-waste	At the end of their lifecycle, the quantity of reclaimed material is negligible.			At the end of their lifecycle, the quantity of reclaimed material is negligible.		



<b>Hazardous Waste</b>		
<b>Other waste</b>		

Presently there are no industrial waste generated. However the manufacturing plant is under process and same shall be reported on the commencement of the same.

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

<b>Indicate product category</b>	<b>Reclaimed products and their packaging materials (as percentage of products sold) for each product category</b>
Not Applicable	

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

Essential Indicators
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**1. a. Details of measures for the well-being of employees:**

% of employees covered by											
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent Employees</b>											
<b>Male</b>	23	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
<b>Female</b>	12	0	0.00	0	0.00	12	100.00	0	0.00	0	0.00
<b>Total*</b>	35	0	0.00	0	0.00	12	100.00	0	0.00	0	0.00
<b>Other than Permanent Employees</b>											
<b>Male</b>	6	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
<b>Female</b>	4	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
<b>Total</b>	10	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

\* Percentage of (D) – maternity benefit is calculated as 100% as per FAQs on BRSR issued by NSE dt. May 10, 2024

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

% of employees covered by											
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent Workers</b>											
<b>Male</b>	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
<b>Female</b>	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
<b>Total</b>	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
<b>Other than Permanent Workers</b>											
<b>Male</b>	8	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
<b>Female</b>	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
<b>Total</b>	8	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

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

	FY 2023-24	FY 2022-23
Cost incurred on well-being measures as a % of total revenue of the Company	0.12	0.00

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

Benefits	FY 2023-24			FY 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 employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	26.00	0.00	Yes	39.00	0.00	Yes
Gratuity	100.00	0.00	NA	100.00	0.00	NA
ESI	23.00	0.00	Yes	18.00	0.00	Yes

## 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**

The Company is dedicated to ensuring that its premises and offices are accessible to employees and workers with disabilities. The office building is designed with features such as wheelchair-friendly ramps and lifts to facilitate easy access. While there are currently no differently-abled employees or workers, the Company proactively maintains this inclusive infrastructure to support and accommodate potential future hires with disabilities. This approach reflects the Company's commitment to fostering inclusivity and creating an accessible workplace for all.

## 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.

The Company is currently developing an Equal Opportunity Policy, which will subsequently be published on the Company's website.

## 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	During the reporting period, no parental leave was availed.			
Female				
Total				

## 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.

	Yes/No (If Yes, then give details of the mechanism in brief)
<b>Permanent Workers</b>	Yes, the factory currently has an informal mechanism in place to receive and address grievances.
<b>Other than Permanent Workers</b>	
<b>Permanent Employees</b>	Yes, the entity has a mechanism in place to receive and redress grievances, including a Whistle-blower Policy available for its employees. This policy allows employees to report any concerns, complaints, or unethical practices within the organization anonymously or confidentially without fear of retaliation.
<b>Other than Permanent Employees</b>	

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

Category	FY 2023-24			FY 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)
<b>Total Permanent Employees</b>	35	0	0.00	28	0	0.00
<b>Male</b>	23	0	0.00	20	0	0.00
<b>Female</b>	12	0	0.00	8	0	0.00
<b>Total Permanent Worker</b>	0	0	0.00	0	0	0.00
<b>Male</b>	0	0	0.00	0	0	0.00
<b>Female</b>	0	0	0.00	0	0	0.00

8. Details of training given to employees and workers:

	FY 2023-24					FY 2022-23				
	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>										
<b>Male</b>	29	0	0.00	29	100.00	34	0	0.00	34	100.00
<b>Female</b>	16	0	0.00	16	100.00	13	0	0.00	13	100.00
<b>Total</b>	45	0	0.00	45	100.00	47	0	0.00	47	100.00
<b>Workers</b>										

<b>Male</b>	8	8	100.00	8	100.00	0	0	0.00	0	0.00
<b>Female</b>	0	0	0.00	0	0.00	0	0	0.00	0	0.00
<b>Total</b>	8	8	100.00	8	100.00	0	0	0.00	0	0.00

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
<b>Male</b>	29	29	100.00	34	34	100.00
<b>Female</b>	16	16	100.00	13	13	100.00
<b>Total</b>	45	45	100.00	47	47	100.00
<b>Workers</b>						
<b>Male</b>	8	0	0.00	0	0	0.00
<b>Female</b>	0	0	0.00	0	0	0.00
<b>Total</b>	8	0	0.00	0	0	0.00

**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, the coverage such system?**

The Company has not yet implemented an occupational health and safety management system. However, we are actively working on developing and introducing such a system. We also plan to ensure comprehensive coverage that addresses various aspects of occupational health and safety within the organization.

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

Currently, the Company does not have a formal policy for regularly identifying work-related hazards and assessing risks, whether routine or non-routine. However, the Company recognizes the critical importance of establishing effective procedures to safeguard its employees and workplace. They are actively striving to implement a systematic approach that includes ongoing hazard identification and risk assessment.

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

The Company does not currently have a formal process for workers to report work-related hazards or to withdraw from risky situations. However, the Company recognizes the importance of creating a clear and effective reporting mechanism that empowers workers to voice concerns about workplace hazards and take necessary actions to protect themselves from potential risks.

**d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)**

At present, the Company's employees and workers do not have access to non-occupational medical and healthcare services. However, the Company is actively working on developing a policy to offer these services in the future. Understanding the

importance of the overall well-being of its workforce, the Company aims to establish a comprehensive healthcare program that addresses their health and wellness beyond occupational needs.

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

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

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

The Company maintains a safe and healthy workplace by implementing strict safety protocols, conducting regular training sessions, and performing ongoing risk assessments. Prioritizing employee well-being, the Company ensures a hazard-free environment and adheres to all relevant health and safety regulations.

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

	FY 2023-24			FY 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	Nil	Nil	NA	Nil	Nil	NA
Health & Safety	Nil	Nil	NA	Nil	Nil	NA

**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.**



Not applicable, as the Company did not conduct any assessments of health and safety practices and working conditions during the reporting period

<b>Leadership Indicators</b>
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- 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).**

At present, the Company does not provide a specific life insurance or compensatory package. However, the Company recognizes the importance of offering support in such unfortunate circumstances and is open to consider the development of such packages in the future.

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

The Company currently does not have methods in place to deduct and deposit statutory dues through their value chain partners.

- 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:**

	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	
	FY 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
<b>Employees</b>	Nil	Nil	Nil	Nil
<b>Workers</b>	Nil	Nil	Nil	Nil

- 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)**

No, the organization does not offer programs to assist with the transition to new employment opportunities or support career transitions following retirement or termination.

- 5. Details on assessment of value chain partners:**

	% of value chain partners (by value of business done with such partners) that were assessed
<b>Health and safety practices</b>	Nil
<b>Working Conditions</b>	Nil

- 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, as the Company did not conduct any assessment of value chain

partners during the reporting year.

**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 acknowledges that core stakeholders are individuals, groups, or institutions that add value to its business operations. The Company has conducted a stakeholder mapping process to identify key stakeholders, including shareholders, employees & workers, customers and communities.

**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 (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
<b>Customers</b>	No	Email, SMS, Newspaper, website, social media, Physical meet	Regular	Awareness campaigns, query resolution
<b>Employees &amp; Workers</b>	No	Email, CEO communication meet, Physical meet	Regular	Employee engagement
<b>Shareholders</b>	No	Various modes including e-mail, newspapers, Company website, Physical meet	Frequently and need basis	Keeping investors updated of all developments in the Company
<b>Communities</b>	No	Email, SMS, Newspaper, website	As and when required	Requisite engagement under CSR objectives

**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 Company has assigned the responsibility for consulting with stakeholders on economic, environmental, and social matters to the Managing Director (MD) of the Company. The MD

and senior leadership team regularly inform the Board and its various Committees about pertinent issues during Board meetings and separate Committee sessions. Additionally, the Company has established processes to ensure that feedback from key stakeholders is collected by management and presented to the Board and its Committees during their meetings.

**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 uses stakeholder consultation to aid in identifying and managing environmental and social issues. The Company values stakeholder input on these topics and integrates their feedback into its policies and activities.

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

The Company does not currently engage with vulnerable/marginalized stakeholder groups.

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

<b>Essentials Indicators</b>
------------------------------

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 2023-24			FY 2022-23		
	Total (A)	No. of employees/workers covered (B)	% (B/A)	Total (C)	No. of employees/workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	35	35	100.00	28	28	100.00
Other than permanent	10	10	100.00	19	19	100.00
<b>Total Employees</b>	<b>45</b>	<b>45</b>	<b>100.00</b>	<b>47</b>	<b>47</b>	<b>100.00</b>
<b>Workers</b>						
Permanent	0	0	0.00	0	0	0.00
Other than permanent	8	8	100.00	0	0	0.00
<b>Total Workers</b>	<b>8</b>	<b>8</b>	<b>100.00</b>	<b>0</b>	<b>0</b>	<b>0.00</b>

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

Category	FY 2023-24					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)
<b>Employees</b>										
Permanent	35	0	0.00	35	100.00	28	0	0.00	28	100.00
Male	23	0	0.00	23	100.00	20	0	0.00	20	100.00
Female	12	0	0.00	12	100.00	8	0	0.00	8	100.00
Other than Permanent	10	0	0.00	10	100.00	19	0	0.00	19	100.00
Male	6	0	0.00	6	100.00	14	0	0.00	14	100.00
Female	4	0	0.00	4	100.00	5	0	0.00	5	100.00
<b>Workers</b>										

Category	FY 2023-24					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)
Permanent	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Male	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Female	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Other than Permanent	8	0	0.00	8	100.00	0	0	0.00	0	0.00
Male	8	0	0.00	8	100.00	0	0	0.00	0	0.00
Female	0	0	0.00	0	0.00	0	0	0.00	0	0.00

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

a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ Salary/ Wages of respective category	Number	Median remuneration/ Salary/ Wages of respective category
Board of Directors (BoD)*	4	8,83,440	0	0
Board of Directors (BoD)**	3	20,000	1	20,000
Key Managerial Personnel^	1	0	1	88,000
Employees other than BoD and KMP	24	2,90,400	13	2,20,614
Workers	8	15780	0	0

\*These Board of Directors consists of executive directors

\*\*These Board of Directors consists of non-executive directors

^Mr. Dinesh Makhija, the Whole Time Director and CFO does not take Remuneration as CFO.

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

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages	23.21	25.97

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 designated the Board of Directors as responsible for overseeing the human resources aspect within the organization.

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

The Company views respect for human rights as a core and essential element of its values. It places a high priority on upholding human rights and actively works to support, protect, and promote these rights. Individuals with concerns or grievances have a direct means of communication with the Company through designated email addresses: [sanmitinfra@gmail.com](mailto:sanmitinfra@gmail.com) and [md@sanmitinfraltd.com](mailto:md@sanmitinfraltd.com). Employees are also encouraged to report their grievances directly to the Directors and senior management. This open communication channel ensures that employees can address their concerns with the appropriate authorities within the organization.

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

	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual harassment	NIL	NIL		NIL	NIL	
Discrimination at workplace						
Child Labour						
Forced Labour/ Involuntary Labour						
Wages						
Other Human Rights related issues						

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

	FY 2023-24	FY 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	0.00	0.00
Complaints on POSH upheld	0	0

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

The Company has established a Whistle-blower policy tailored for employees, allowing them to report concerns or violations directly to the Audit Committee. Employees who encounter any misconduct or wrongdoing can confidentially file a complaint with the Audit Committee and Directors. When a violation is reported, the Audit Committee and Directors promptly initiate an investigation to collect relevant information and evidence. If the investigation confirms the alleged wrongdoing, appropriate actions will be taken against the individual found guilty.

**9. Do human rights requirements form part of your business agreements and contracts?**

Yes, human rights considerations are a fundamental component of the Company's business agreements and contracts. The Company acknowledges the importance of upholding and respecting human rights across all aspects of its operations.

**10. Assessments for the year:**

	<b>% of your plants and Offices that were assessed (by entity or statutory authorities or third parties)</b>
<b>Child Labour</b>	NIL, as the Company has not conducted any assessments during the reporting year
<b>Forced/involuntary labour</b>	
<b>Sexual Harassment</b>	
<b>Discrimination at workplace</b>	
<b>Wages</b>	

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

Not applicable, as the Company did not conduct any assessments during the reporting period

**Leadership Indicators**

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

During the reporting year, the Company did not receive any human rights grievances/complaints, which suggests that the Company's business operations and workplace procedures are structured to uphold human rights standards

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

The Company currently does not conduct any human rights due diligence. However, it is open to evaluating its relevance and considering its implementation in the coming years.

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

The Company ensures that its premises and offices are accessible to differently-abled visitors. The office building is designed to be easily accessible to individuals with disabilities, featuring wheelchair-friendly ramps and lifts.

**4. Details on assessment of value chain partners:**

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
<b>Sexual Harassment</b>	NIL, as the Company has not conducted any assessments during the reporting year
<b>Discrimination at workplace</b>	
<b>Child Labour</b>	
<b>Forced Labour / Involuntary Labour</b>	
<b>Wages</b>	

**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, as the Company did not conduct any assessment of value chain partners during the reporting year.



**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:

<b>Parameter</b>	<b>FY 2023-24 (In Gigajoules)</b>	<b>FY 2022-23 (In Gigajoules)</b>
<b>From renewable sources</b>		
Total electricity consumption (A)	0.00	0.00
Total fuel consumption (B)	0.00	0.00
Energy consumption through other sources (C)	0.00	0.00
Total Energy consumption from renewable sources (A+B+C)	0.00	0.00
<b>From non-renewable sources</b>		
Total electricity consumption (D)^	210.04	0.00
Total fuel consumption (E)#	8,052.44	8,100.42
Energy consumption through other sources (F)	0.00	0.00
Total Energy consumption from non-renewable sources (D+E+F)	8,262.48	8,100.42
Total energy consumed (A+B+C+D+E+F)	8,262.48	8,100.42
Energy intensity per rupee of turnover (Total energy consumption/ Revenue from Operations) - MJ/Rupees	0.000009	0.000006
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP) - MJ/Rupees	0.00020	0.00013
Energy intensity in terms of physical output <sup>s</sup> - MJ/Metric Tonnes	3.44	0.00

^For purchased electricity, data from the Corporate Office (CO) was not available and not quantifiable, as it is a leased property and does not receive electricity bills. Only the Plant's electricity consumption was taken into account. However, it is important to note that the Plant was not operational during the FY 22-23.

#For FY 22-23, only Company owned vehicles have been taken into consideration as the plant was not operational.

\$ No physical output for FY 22-23 as the plant was non-operational.

**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.**

There hasn't been an external review or analysis conducted to assess various aspects of our operations, performance, or compliance with standards or regulations.

- 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**

Our facilities at Sanmit Infra Ltd. are not included within the ambit of the Perform, Achieve, and Trade (PAT) Scheme initiated by the Government of India.

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

Parameter	FY 2023-24	FY 2022-23
<b>Water withdrawal by source (in kilolitres)</b>		
<b>(i) Surface water</b>	0.00	0.00
<b>(ii) Ground water</b>	647.64	0.00
<b>(iii) Third party water</b>	214.44	143.18
<b>(iv) Seawater / desalinated water</b>	0.00	0.00
<b>(v) Others</b>	0.00	0.00
<i>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</i>	862.08	143.18
<b>Total volume of water consumption (in kilolitres)</b>	789.61	107.39
Water intensity per rupee of turnover <b>(Water consumed / Revenue from operations) - KL/Rupees</b>	0.0000008	0.0000001
Water Intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) <b>(Total water consumption / Revenue from operations adjusted for PPP) \$ - KL/Rupees</b>	0.000019	0.0000017
Water intensity in terms of physical output <sup>\$</sup> - <b>KL/Rupees</b>	0.33	0.00

\$ No physical output for FY 22-23 as the plant was non-operational.

**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.**

There hasn't been an external review or analysis conducted to assess various aspects of our operations, performance, or compliance with standards or regulations.

**4. Provide the following details related to water discharged**

<b>Parameter</b>	<b>FY 2023-24</b>	<b>FY 2022-23</b>
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
<b>(i) To Surface water</b>	0.00	0.00
- No treatment		
- With treatment – please specify level of treatment		
<b>(ii) To Groundwater</b>	0.00	0.00
- No treatment		
- With treatment – please specify level of treatment		
<b>(iii) To Seawater</b>	0.00	0.00
- No treatment		
- With treatment – please specify level of treatment		
<b>(iv) Sent to third-parties</b>		
- No treatment	72.47	35.80
- With treatment – please specify level of treatment		
<b>(v) Others</b>	0.00	0.00
- No treatment		
- With treatment – please specify level of treatment		
<b>Total water discharged (in kilolitres)</b>	<b>72.47</b>	<b>35.80</b>

**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.**

There hasn't been an external review or analysis conducted to assess various aspects of our operations, performance, or compliance with standards or regulations.

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

The Company currently does not have any mechanisms or systems in place for achieving Zero Liquid Discharge (ZLD).

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

<b>Parameter</b>	<b>Please specify unit</b>	<b>FY 2023-24</b>	<b>FY 2022-23</b>
<b>NOx</b>			

<b>Parameter</b>	<b>Please specify unit</b>	<b>FY 2023-24</b>	<b>FY 2022-23</b>
<b>SOx</b>	For FY 2022-23, the plant was non-operational, and for FY 2023-24, air emissions (excluding GHG emissions) were not quantifiable. The Company plans to measure and quantify these emissions.		
<b>Particulate matter (PM)</b>			
<b>Persistent organic pollutants (POP)</b>			
<b>Volatile organic compounds (VOC)</b>			
<b>Hazardous air pollutants (HAP)</b>			
<b>Others - please specify</b>			

**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.**

There hasn't been an external review or analysis conducted to assess various aspects of our operations, performance, or compliance with standards or regulations.

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

<b>Parameter</b>	<b>Unit</b>	<b>FY 2023-24</b>	<b>FY 2022-23</b>
Total Scope 1 emissions <sup>^</sup> <b>(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)</b>	Metric tonnes of CO2 equivalent	493.42	464.86
Total Scope 2 emissions # <b>(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)</b>	Metric tonnes of CO2 equivalent	47.84	0.00
Total Scope 1 and Scope 2 emissions per rupee of turnover <b>(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)</b>	Metric tonnes of CO2 equivalent/Rupees	0.00000057	0.00000033
Total Scope 1 and Scope 2 emissions per rupee of turnover adjusted for Purchasing Power Parity (PPP) <b>(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)</b>	Metric tonnes of CO2 equivalent/Rupees	0.0000129	0.0000074
Total Scope 1 and Scope 2 emissions intensity in terms of physical output <sup>\$</sup>	Metric tonnes of CO2 equivalent/Metric tonnes	0.23	0.00

<sup>^</sup> For Scope 1 only, fuel used in process and vehicles is taken into consideration.

# For purchased electricity, data from the Corporate Office (CO) was not available and not quantifiable, as it is a leased property and does not receive electricity bills. Only the Plant's electricity consumption was taken into account. However, it is important to note that the Plant was not operational during the FY 22-23.

<sup>\$</sup> No physical output for FY 22-23 as the plant was non-operational.

**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.**

There hasn't been an external review or analysis conducted to assess various aspects of our operations, performance, or compliance with standards or regulations.

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

During the reporting year, the Company did not initiate any projects focused on GHG emission reduction. However, we are committed to reducing carbon emissions in the future and plan to adopt innovative strategies to achieve this goal.

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

Parameter	FY 2023-24	FY 2022-23
<b>Total Waste generated (in metric tonnes)</b>		
<b>Plastic waste (A)</b>	0.00	0.00
<b>E-waste (B)</b>	0.00	0.00
<b>Bio-medical waste (C)</b>	0.00	0.00
<b>Construction and demolition waste (D)</b>	0.00	0.00
<b>Battery waste (E)</b>	0.00	0.00
<b>Radioactive waste (F)</b>	0.00	0.00
<b>Other Hazardous waste (G) – Drums containing Bitumen</b>	37.57	0.00
<b>Other Non-hazardous waste generated (H) – Kitchen Waste</b>	1.50	1.50
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>39.07</b>	<b>1.50</b>
<b>Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) – MT/Rupees</b>	<b>0.000000041</b>	<b>0.000000001</b>
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) – MT/Rupees</b>	<b>0.000000093</b>	<b>0.000000002</b>
<b>Waste intensity in terms of physical output<sup>s</sup></b>	<b>0.016</b>	<b>0.00</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 - Hazardous waste</b>		
<b>(i) Recycled</b>	0.00	0.00
<b>(ii) Re-used</b>	0.31	0.00
<b>(iii) Other recovery operations</b>	0.00	0.00
<b>Total</b>	<b>0.31</b>	<b>0.00</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste - Hazardous waste and Non - Hazardous waste</b>		

Parameter	FY 2023-24	FY 2022-23
<b>(i) Incineration</b>	0.00	0.00
<b>(ii) Landfilling</b>	1.50	1.50
<b>(iii) Other disposal operations - Re-conditioning of Drums and sold by the Authorized vendor</b>	<b>37.26</b>	<b>0.00</b>
<i>Total</i>	<b>38.76</b>	<b>1.50</b>

\$ No physical output for FY 22-23 as the plant was non-operational.

**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.**

There hasn't been an external review or analysis conducted to assess various aspects of our operations, performance, or compliance with standards or regulations.

**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**

The Company purchases bitumen in drums from the importer and transport it from the port to our Rasayani plant. At the plant, we use a decanting machine to melt the bitumen from the drums, which is then stored in vertical tanks. After the melting process, the empty drums are placed in a designated open area outside the plant. Our authorized vendor, M/S Global Trading Company, collects all the empty drums, reconditions them, and sells them to his customers.

**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:**

S. No.	Location of operations/offices	Types 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.
The Company refrains from conducting its operations in environmentally fragile or ecologically sensitive regions. This strategic decision underscores the Company's commitment to responsible business practices and environmental stewardship, avoiding potential harm to delicate ecosystems. By deliberately choosing locations that are not ecologically sensitive, the Company aims to minimize its environmental impact and contribute to the preservation of biodiversity and natural habitats.			

**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
N/A. In accordance with the Ministry of Environment, Forest & Climate Change (MoEF) guidelines, the industry/operations are exempt from the requirement to furnish environmental clearance or undergo an Environmental Impact Assessment (EIA).					

**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, and Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:**

Serial Number	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 taken, if any action
Yes, the Company adheres to all relevant environmental laws and regulations.				

### Leadership Indicators

**1. 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:**

- (i) Name of the area
- (ii) Nature of operations
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in kilolitres)		
(i) Surface water	Our Company is situated in regions where water availability is not a concern. This deliberate choice of locations is part of our commitment to responsible resource management, ensuring that our operations have minimal impact on water-stressed areas.	
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		
Total volume of water withdrawal (in kilolitres)		
Total volume of water consumption (in kilolitres)		
Water intensity per rupee of turnover ( <b>Water consumed / turnover</b> )		
Water intensity ( <b>optional</b> ) - the relevant metric may be selected by the entity		

Parameter	FY 2023-24	FY 2022-23
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
<b>(i) Into Surface water</b>	Our Company is situated in regions where water availability is not a concern. This deliberate choice of locations is part of our commitment to responsible resource management, ensuring that our operations have minimal impact on water-stressed areas.	
- No treatment		
- With treatment – please specify level of treatment		
<b>(ii) Into Groundwater</b>		
- No treatment		
- With treatment – please specify level of treatment		
<b>(iii) Into Seawater</b>		
- No treatment		
- With treatment – please specify level of treatment		
<b>(iv) Sent to third-parties</b>		
- No treatment		
- With treatment – please specify level of treatment		
<b>(v) Others</b>		
- No treatment		
- With treatment – please specify level of treatment		
Total water discharged (in kilolitres)		

**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.**

There hasn't been an external review or analysis conducted to assess various aspects of our operations, performance, or compliance with standards or regulations.

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

For the calculation of Scope 3 emissions, only the data related to waste generation, disposal, and recovery is taken into consideration for both the financial years.

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 3 emissions <b>(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) (Limited)</b>	<i>Metric tonnes of CO2 equivalent</i>	0.946881078	0.940284218
Total Scope 3 emissions per rupee of turnover	<i>Metric tonnes of CO2 equivalent</i>	0.0000000010	0.0000000007

**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.**

There hasn't been an external review or analysis conducted to assess various aspects of our operations, performance, or compliance with standards or regulations.



**3. With respect to the ecologically sensitive areas reported at Question 11 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 refrains from conducting its operations in environmentally fragile or ecologically sensitive regions. This strategic decision underscores the Company's commitment to responsible business practices and environmental stewardship, avoiding potential harm to delicate ecosystems. By deliberately choosing locations that are not ecologically sensitive, the Company aims to minimize its environmental impact and contribute to the preservation of biodiversity and natural habitats.

**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:**

Sr. No.	Initiative undertaken	Details of the initiative ( <i>Web-link, if any, may be provided along-with summary</i> )	Outcome of the initiative
<p>The Company has not yet undertaken any specific initiatives or implemented innovative technologies aimed at improving resource efficiency or reducing the impact of emissions, effluent discharge, or waste generation. However, we recognize the importance of these efforts and are committed to exploring and considering such initiatives in the future. As we move forward, we will assess opportunities to adopt sustainable practices and technologies that align with our commitment to environmental stewardship and operational efficiency.</p>			

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

The Company does not currently have a business continuity and disaster management plan in place. However, understanding the critical need for preparedness in the face of potential disruptions, the Company is proactively taking steps to develop a comprehensive plan. This initiative aims to ensure that the Company can maintain operational resilience and manage crises effectively, safeguarding both business continuity and stakeholder interests.

**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?**

The Company has not undertaken any mitigation or adaptation measures as of yet.

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

The Company has not undertaken any mitigation or adaptation measures as of yet.

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

<b>Essential Indicators</b>
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1.

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

The Company is currently not affiliated with any trade or industry chamber but will consider such affiliations in the future.

b) **List the top 10 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)
The Company is currently not affiliated with any trade or industry chamber but will consider such affiliations in the future.		

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

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

<b>Leadership Indicators</b>
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1. **Details of public policy positions advocated by the entity:**

Sr. No	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others - please specify)	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 financial year.**

Name and Brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web Link
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Not Applicable, as the Company does not come under the requirements of Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement (Social Impact Assessment and Consent) Rules, 2014

- 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.**

At present, the Company does not have a formal grievance redressal mechanism for the community. However, they are actively working to address community concerns, potentially using informal channels or ad hoc methods.

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

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/ small producers	22.81	17.39
Directly from within India	77.19	86.96

**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	FY 2023-24	FY 2022-23
Rural	0.00	0.00
Semi-Urban	0.00	0.00
Urban	10.56	0.00
Metropolitan	89.44	100.00

**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)
Not Applicable			

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

No, The Company does not currently have a preferential procurement policy currently

**(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 financial year), based on traditional knowledge:**

S.No	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	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
1	Brihaspati Welfare Foundation	This foundation promotes services like Arts and Culture, Women Empowerment and Empathy for Saints	100.00
2	Omkar Andh - Apang Samajik Santha	The Trust is engaged in various activities like the upliftment of Eco-Socio Backward Society by providing Health Education and Self-Employment.	100.00

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

<b>Essential Indicators</b>
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**1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

Consumers can submit their feedback and complaints through the Company's official email, [sanmitinfra@gmail.com](mailto:sanmitinfra@gmail.com), or by calling 022-67429100 or 9223400434. The Compliance Officer is in charge of addressing these grievances, ensuring a prompt and effective process for managing consumer concerns.

**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	1.33
Safe and responsible usage	0.00
Recycling and/or safe disposal	0.00

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

	FY 2023-24		Remarks	FY 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	NA	0	0	NA
Advertising	0	0	NA	0	0	NA
Cyber-security	0	0	NA	0	0	NA
Delivery of essential services	0	0	NA	0	0	NA
Restrictive Trade Practices	0	0	NA	0	0	NA
Unfair Trade Practices	0	0	NA	0	0	NA
Other - Customer Complaints	0	0	NA	0	0	NA
<b>Total</b>	<b>0</b>	<b>0</b>	<b>NA</b>	<b>0</b>	<b>0</b>	<b>NA</b>

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

	Number	Reasons for recall
<b>Voluntary recalls</b>	NIL	NA
<b>Forced recalls</b>	NIL	NA

**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 data security policy which is available on the intranet. Instead, data is stored on a secure server that only authorized employees can access using individual passwords. This method ensures the protection of information related to employees, consumers, third parties, and suppliers, which is carefully organized in secure folders to maintain confidentiality and data integrity.

**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.**

Not Applicable.

**7. Provide the following information relating to data breaches:**

**a. Number of instances of data breaches**

NIL, there have not been any such instances during the reporting period

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

NIL, there have not been any such instances during the reporting period

**c. Impact, if any, of the data breaches**

Not Applicable

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

Details about the products and services offered by the Company are available through multiple channels and platforms. For comprehensive information, please visit the official website at [www.sanmitinfraltd.com](http://www.sanmitinfraltd.com).

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

Product safety details are provided directly with the product, and our operator, who is dispatched for installation, also explains safe usage procedures.

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

The Company is working on establishing a strong system to notify customers of any potential risks of disruptions or discontinuation of essential services.

**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. 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 offers product information on its website and complies with the regulations set by local laws.






# UN SDG ALIGNMENT JOURNEY

The initiatives taken by Sanmit confer with many UNSDGs. The alignment of these initiatives with the NGRBC principles & UNSDGs is as follows:<sup>2</sup>

	<p><b>SDG 3: GOOD HEALTH AND WELL BEING ( BRSR P3 &amp; BRSR P8)</b></p> <p>The Company’s Rasayani unit has obtained <b>ISO 45001:2018</b> certification, demonstrating our commitment to health, and safety standards. This ISO outlines criteria for an Occupational Health and Safety (OH&amp;S) management system and offers advice on its implementation. Its purpose is to help organizations create safe and healthy work environments by preventing work-related injuries and illnesses, and by actively enhancing their OH&amp;S performance. The certificate was acquired by the Company in 2023.</p>
	<p><b>SDG 4: QUALITY EDUCATION (BRSR P8)</b></p> <p>As part of its CSR commitment, The Company contribute to initiatives that promote the holistic development of economically and socially disadvantaged communities by offering health education and promoting self-employment opportunities.</p>
	<p><b>SDG 5: GENDER EQUALITY (BRSR P3, BRSR P4 &amp; BRSR P5)</b></p> <p>The Company upholds SDG 5, by providing maternity benefits to female employees in full compliance with the Maternity Benefit Act, 1961 and human rights principles. This approach demonstrates our dedication to promoting equal opportunities and creating a supportive work environment for women during their maternity period. Through these benefits, the Company seeks to support a healthy work-life balance and encourage gender inclusivity in the workplace.</p>

<sup>2</sup> The ISSB™, IFRS™, SASB™ and International Financial Reporting Standards are registered trademarks of the IFRS Foundation. SDG Logo, the SDG Wheel and any of the 17 UNSDG™ icons are Intellectual Property of United Nations.

	<p><b>SDG 16: PEACE, JUSTICE AND STRONG INSTITUTIONS (BRSR P1, BRSR P3, BRSR P5, BRSR P7&amp; BRSR P8)</b></p> <p>To ensure integrity, transparency, independence and accountability in dealing with all stakeholders, the Company has adopted various codes and policies to carry out business in an ethical manner. Some of these codes and policies are as follows:</p> <ul style="list-style-type: none"> <li>▪ Code of Conduct for Directors and senior management</li> <li>▪ Board Diversity Policy</li> <li>▪ Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their immediate relatives</li> <li>▪ Code of Conduct for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)</li> <li>▪ Policy on Determination of Materiality for Disclosure</li> <li>▪ Whistle Blower Policy</li> <li>▪ Policy on Preservation and Archival of Documents</li> <li>▪ Risk Management Policy</li> </ul>
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#### Abbreviations used

Sr. No.	Particulars
1.	ESG: Environmental, Social and Governance
2.	SDG: Sustainable Development Goals
3.	SASB: Sustainability Accounting Standards Board
4.	SEBI: Securities and Exchange Board of India
5.	BRSR: Business Responsibility & Sustainability Reporting
6.	ISSB : International Sustainability Standards Board
7.	IFRS : International Financial Reporting Standards