

Date: 7th September, 2023

BSE Limited

Phiroze Jeejeebhoy Tower,
Dalal Street,
Mumbai – 400 001
Scrip Code: 512179

National Stock Exchange of India Ltd

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

Sub: Business Responsibility and Sustainability Report for the Financial Year 2022-23

Dear Sir/ Madam,

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations 2015, we are submitting herewith the Business Responsibility and Sustainability Report (BRSR) for Financial Year (FY) 2022-23.

The said BRSR forms part of the Annual Report for FY 2022-23 submitted to Stock Exchanges vide letter dated 5th September, 2023.

This is for your information and records.

Thanking you.

For Sunteck Realty Limited

Rachana Hingarajia
Company Secretary
Encl: a/a

ANNEXURE III

Business Responsibility & Sustainability Reporting (BRSR)

SECTION A: GENERAL DISCLOSURES

1. Details of the listed entity

Corporate Identity Number (CIN) of the Listed Entity	L32100MH1981PLC025346
Name of the Listed Entity	Sunteck Realty Limited
Year of incorporation	01-10-1981
Registered office address	5th Floor, Sunteck Centre, 37-40, Subhash Road, Vile Parle (East), Mumbai 400057
Corporate address	5th Floor, Sunteck Centre, 37-40, Subhash Road, Vile Parle (East), Mumbai 400057
E-mail	cosec@sunteckindia.com
Telephone	022-42877800
Website	www.sunteckindia.com
Financial year for which reporting is being done	2022-23
Name of the Stock Exchange(s) where shares are listed	BSE Limited & National Stock Exchange of India Limited
Paid-up Capital	₹ 146,478,718 as on 31st March, 2023
Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Name: Rachana Hingarajia Contact: 022-42877800 Email: cosec@sunteckindia.com
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).	Consolidated. Disclosures are made on a consolidated basis for Sunteck Realty Limited and its subsidiaries. More details on the entities covered are provided as response to Q.8 (a) 'Names of holding / subsidiary / associate companies / joint ventures. The reporting timeline for this Report is 1st April, 2022 to 31st March 2023

2. Products/services

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

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

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

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

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

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

5. Markets served by the entity:

a. Number of locations

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

ANNEXURE III (Contd.)

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

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

c. A brief on types of customers

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

6. Employees**Details as at the end of Financial Year:****a. Employees and workers (including differently abled):**

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	511	359	70.25%	152	29.75%
2.	Other than Permanent (E)	22	7	31.81%	15	68.19%
3.	Total employees (D + E)	533	366	68.66%	167	31.34%
WORKERS						
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	0	0	0	0	0
6.	Total workers (F + G)	0	0	0	0	0

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

b. Differently abled Employees and workers

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

7. Participation/Inclusion/Representation of women

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

Note: CS (female) is a member of Board of director and is also a KMP. Since, she is primarily defined as BOD, for representation purpose and for avoidance of duplication we have not considered her as KMP

ANNEXURE III (Contd.)

8. Turnover rate for permanent employees and workers

	2022-23			2021-22			2020-21		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	30.64%	10.55%	41.20%	27.8%	11.44%	39.24%	19.16%	9.4%	28.57%
Permanent Workers	0	0	0	0	0	0	0	0	0

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

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

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

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% Of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Satguru Infocorp Services Private Limited	Subsidiary	100%	No
2	Sunteck Property Holdings Private Limited	Subsidiary	100%	No
3	Sunteck Realty Holdings Private Limited	Subsidiary	100%	No
4	Starlight Systems Private Limited	Subsidiary	100%	No
5	Sahrish Constructions Private Limited	Subsidiary	100%	Yes
6	Starteck Lifestyle Private Limited	Subsidiary	100%	No
7	Advaith Infraprojects Private Limited	Subsidiary	100%	No
8	Sunteck Real Estates Private Limited	Subsidiary	100%	No
9	Sunteck Infraprojects Private Limited	Subsidiary	100%	No
10	Skystar Buildcon Private Limited	Subsidiary	100%	Yes
11	Satguru Corporate Services Private Limited	Subsidiary	100%	Yes
12	Shivay Brokers Private Limited	Subsidiary	100%	No
13	Sunteck Lifestyle International Private Limited	Subsidiary	100%	No
14	Sunteck Lifestyle Limited	Subsidiary	100%	No
15	Sunteck Lifestyle Management DMCC	Subsidiary	100%	No
16	Sunteck Lifespace Private Limited	Subsidiary	100%	No
17	Industele Property Private Limited	Subsidiary	100%	No
18	Rammit Corporate Solutions Private Limited	Subsidiary	100%	No

ANNEXURE III (Contd.)

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)
19	Sunteck Infracon Private Limited	Subsidiary	100%	No
20	Sunteck Realtors Private Limited	Subsidiary	100%	No
21	Starlight Systems (I) Private Limited	Subsidiary	100%	No
22	Rusel Multiventures Private Limited	Subsidiary	100%	No
23	Clarissa Facility Management LLP	Subsidiary	100%	No
24	Mithra Buildcon LLP	Subsidiary	100%	No
25	Magnate Industries LLP	Subsidiary	100%	No
26	Piramal Sunteck Realty Private Limited	Joint Venture	50	No
27	Uniworth Realty LLP	Joint Venture	50	No
28	Nariman Infrastructure LLP	Joint Venture	50	No
29	GGICO Sunteck Limited	Joint Venture	50	No

10. CSR Details

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

(ii) Turnover (in ₹) - ₹ 362.45 Crores

(iii) Net worth (in ₹) - ₹ 2,787.85 Crores

11. Transparency and Disclosures Compliances**Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:**

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)	2022-23			2021-22			
		(If yes, then provide web-link for grievance redress policy)	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes*		0	0	NA	0	0	NA
Investors (other than shareholders)	Yes*		0	0	NA	0	0	NA
Shareholders	Yes*		0	0	NA	0	0	NA
Employees and workers	Yes*		10	0	None	0	0	NA
Customers	Yes*		52	0	None	0	56	None
Value Chain Partners	Yes*		0	0	NA	0	0	NA

ANNEXURE III (Contd.)

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)	2022-23			2021-22		
		(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
Other (please specify)	-	0	0	NA	0	0	NA

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

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

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

The Company is cognizant of relevant material issues for the sector that can have an impact on the Company’s value creation process and are critical for the implementation of sustainable practices. These issues are periodically evaluated and identified to mitigate any risks to the Company’s operations

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.	Sustainable Sourcing	Opportunity	Sunteck relies on a variety of raw materials for construction and maintenance, including steel, cement, lumber, and plastic. We are working with suppliers to understand their sourcing practices, assess environmental and social risks, and diversify their supply chains.	-	Positive
2.	Occupational Health and Safety	Opportunity	As a real estate company, we face various occupational health and safety risks related to their operations. By prioritising occupational health and safety, we strive to protect our employees and contractors while reducing the financial and reputational risks associated with workplace accidents and injuries.	-	Positive

ANNEXURE III (Contd.)

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3.	Employee Well-being and Development	Risk	Real Estate companies often have a high turnover rate for their employees. Employee wellbeing and development is essential metric for our company and a careful balance needs to be maintained when it comes to prioritisation of such KPIs	Offering resources and support systems to help employees cope with stress, such as stress management workshops, wellness programs, and Employee Assistance Programs	Negative
4.	Emissions	Risk	Failing to address emissions can lead to several risks for our company especially when emissions are so intense for our sector which being the biggest contributor. We may incur reputational damages, penalties and increased operational costs if emissions are not managed well	It's our endeavor to mitigate the risk associated with emissions; following are some strategies which we strive to initiate 1. Transition to Clean Energy Sources 2. Improve Energy Efficiency 3. Effective waste management practices	Negative
5.	Business ethics & Corporate Governance	Opportunity	Sunteck believes managing and prioritising corporate governance can help a real estate company to manage its risk effectively. We see it as an opportunity as implementing strong corporate governance practices can help avoid reputational damage, regulatory penalties and legal issues.	-	Positive
6.	Diversity, Equity, and Inclusion	Opportunity	Sunteck constantly strives to have a diverse and inclusive workplace as it helps to serve a diverse customer base. We see it as an opportunity to prioritise and balance DEI at our company to reap varied benefits like improved collaboration, brand reputation etc.	-	Positive

ANNEXURE III (Contd.)

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
7.	Green building and Certifications	Opportunity	<p>Green building certification offers both risks and opportunities</p> <p>Risk:</p> <p>Achieving certification requires adherence to specific guidelines, standards, and documentation procedures. Meeting these requirements can be challenging and time-consuming, particularly for developers unfamiliar with green building practices.</p> <p>Opportunity</p> <ol style="list-style-type: none"> Green buildings often demonstrate long-term cost savings through reduced energy consumption, water efficiency, and lower maintenance expenses. Lower operating costs can offset the initial investment, providing financial benefits over the building's lifespan. Green buildings prioritise occupant health and well-being by incorporating features such as improved indoor air quality, natural lighting, and access to green spaces. These factors can positively impact occupants' productivity, satisfaction, and overall quality of life. 	<p>Sunteck is aligned with EDGE-IFC green building certification for its commercial and residential projects</p> <p>In order to mitigate risk of meeting the requirements of green building certification, we have taken following steps</p> <ol style="list-style-type: none"> Investing in education and training programs to enhance understanding of sustainable design principles, green building techniques, and certification requirements. Conducting precertification assessment of commercial and residential projects 	Positive

ANNEXURE III (Contd.)

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
8.	Waste and Effluent Management	Opportunity	Sunteck prioritises proper waste management as it mitigates environmental impact, complies with regulations, reduces costs, enhances corporate reputation, and meets stakeholder expectations	-	Positive
9.	Water Conservation	Opportunity	Water conservation is important to meet environmental regulations, reduce operational costs, ensure business continuity in water-stressed areas, contribute to SDGs, and meet stakeholder expectations	-	Positive
10.	Occupants Satisfaction	Risk and opportunity	Occupant satisfaction is critical to the Company to maintain revenue and reputations high overtime which will ensure successful business	Establishing effective communication channels to keep occupants informed about updates, changes related to project	Negative
11.	Economic Performance	Opportunity	Economic performance is vital as it helps the Company deliver on its sustainability goals and also helps attract environmentally conscious customers, investors, and partners who value responsible and sustainable practices. It is one of the key factors to assess financial health of the Company and attract investment	-	Positive

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

S. No.	Principle Description	Reference of Sunteck Policies
P1	Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.	<ul style="list-style-type: none"> • Code of Conduct Policy, • Anti-Bribery and Anti-Corruption Policy, • Whistleblower Policy, • Related Party Transactions Policy • Nomination and Remuneration Policy • Fair disclosure code • Policy for determination of materiality • Board diversity Policy • Tax Policy

ANNEXURE III (Contd.)

S. No.	Principle Description	Reference of Sunteck Policies
P2	Businesses should provide goods and services in a manner that is sustainable and safe	<ul style="list-style-type: none"> Environmental Policy Supplier code of conduct Policy
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains	<ul style="list-style-type: none"> Human Rights Policy Whistleblower Policy, Freedom of Association and Collective Bargaining Policy
P4	Businesses should respect the interests of and be responsive to all its stakeholders	<ul style="list-style-type: none"> Corporate Social Responsibility Policy Stakeholder Engagement Policy Grievance Redressal Policy
P5	Businesses should respect and promote human rights	<ul style="list-style-type: none"> Code of Conduct Policy Human Rights Policy Whistleblower Policy
P6	Businesses should respect and make efforts to protect and restore the environment	<ul style="list-style-type: none"> ESG Policy Environment policy
P7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent	<ul style="list-style-type: none"> Anti-Bribery and Anti-Corruption Policy Policy on determining materiality Dividend Distribution Policy Policy for Archiving, Preservation and Disposal of documents
P8	Businesses should promote inclusive growth and equitable development	<ul style="list-style-type: none"> Corporate Social Responsibility Policy
P9	Businesses should engage with and provide value to their consumers in a responsible manner	<ul style="list-style-type: none"> Code of Conduct Stakeholder Engagement Policy Cyber Security Policy

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

ANNEXURE III (Contd.)

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Not applicable								
Governance, leadership and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)									
Dear Stakeholders,									
<p>I am delighted to present Sunteck Realty's latest sustainability report, titled "Redefining Real Estate: Sustainable Living for a Better World". As we continue to navigate our ever-changing business environment, we understand the importance of innovative thinking and the need to build a pathway that aligns with sustainable standards. Our goal is to create long-term value, fuel growth, strengthen communities, and protect our environment. Throughout our journey, Sunteck Realty has upheld the highest standards of ethical conduct. Trust has been the cornerstone of our success, and we remain dedicated to maintaining the trust of our stakeholders. Our emphasis on good governance, financial discipline, and transparent communication has propelled us to become one of the fastest-growing luxury real estate developers in Mumbai. Today, we take pride not only in providing quality craftsmanship, luxury, and comfort but also in achieving all of this sustainably.</p> <p>In the fiscal year 2022-23, we have achieved remarkable milestones that highlight our endurance to sustainability. We are proud to announce that our properties are now green buildings pre-certified by prestigious EDGE-IFC, a member of the World Bank Group. This certification underscores our focus on creating environmentally responsible spaces that minimise their ecological footprint while providing exceptional living experiences. Additionally, our corporate head office Sunteck Centre has received LEED Existing building Gold certification from U.S Green Building Council.</p> <p>Furthermore, waste management has been a priority for us, and I am delighted to share that both Signature Island and Signia Isles have achieved the remarkable feat of zero waste to landfill. We are actively promoting a circular economy, reducing waste generation, and implementing effective recycling and waste management practices throughout our operations. We have also made significant progress in incorporating recycled materials into our construction processes. By utilising 32% recycled materials, we are not only reducing the demand for virgin resources but also contributing to the circular economy and minimising waste generation.</p> <p>Our adherence to the safety and well-being of our employees is evident through the achievement of zero fatalities, accidents, and lost days. This milestone reflects the rigorous safety protocols and training programs in place, ensuring that every individual goes home safely at the end of each day.</p> <p>As we reflect on our accomplishments, we are energised by the limitless potential that lies ahead. We envision a world where sustainable real estate practices are the norm, where buildings harmonise with nature, and where communities thrive in harmony with their surroundings. This vision drives us to push the boundaries of what is possible and continue raising the bar for sustainable development. Together, let us embrace the responsibility we have as leaders to build a sustainable real estate industry that not only meets the needs of the present but also ensures a brighter future for generations to come</p>									
Warm regards, Kamal Khetan Chairman and Managing Director									
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy/policies	The implementation of business responsibility policies is the responsibility of both the compliance team and the ESG (Environmental, Social, and Governance) committee. The oversight for these efforts is provided by the Chairman and Managing Director.								
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Sunteck has constituted the ESG Committee to oversee key activities within the Company and ensure effective implementation of sustainable objectives. The responsibilities of the Committee include the development and assessment of ESG goals and Policies, development of investor communication, driving progress on key performance indicators, and evaluation of the same on a regular basis. The Committee ensures to communicate the critical concerns to the Chairman and Managing Director who is the primary decision maker for sustainability related performance.								

ANNEXURE III (Contd.)

10. Details of Review of NGRBCs by the Company:

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

	P1	P2	P3	P4	P5	P6	P7	P8	P9
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.	Internal assessment was carried out by reviewing the policies on a periodic basis and evaluate working of the same by assessing the adequacy and effectiveness in terms of best practices followed by other organisations of repute. For 2022-23, no external agency has undertaken an assessment/evaluation.								

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

Not Applicable.

ANNEXURE III (Contd.)

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.**Essential Indicators****1. Percentage coverage by training and awareness programmes on any of the Principles during the financial year:**

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	1	ESG training conducted for the board provided them a comprehensive framework to understand all the components covered under the nine principles of the BRSR framework	100%
KMP	1		100%
Employees other than BoD and KMPs	2	1. ESG Training 2. Health & Safety Training	100%
Workers	NA		0%

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

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

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

ANNEXURE III (Contd.)

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

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

Not Applicable

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

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

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

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

Category	2022-23	2021-22
Directors	0	0
KMPs	0	0
Employees	0	0

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

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

	2022-23		2021-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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

ANNEXURE III (Contd.)

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

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

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

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

Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe
Essential Indicators
1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

	2022-23	2021-22	Details of improvements in environmental and social impacts
R&D	0%	0%	NA
Capex	1%	0%	The Company has not made any expenditure on research and development for 2022-23. However, in an effort to promote green living among its development portfolio, the Company has made efforts to install solar water heaters and STP's in its residential buildings accounting to 1%. Additionally, as a sustainable conscious company, we also invest in significant use of sustainable products in our developments to ensure operational efficiency in the form of utilising recycled steel, fly ash, AAC blocks, top rated energy saving equipment's, solar water heaters, sewage treatment plants, etc.

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

By educating and motivating our suppliers to adopt sustainability initiatives and encouraging them to disclose their sustainability performance, we track, monitor, and implement initiatives to improve the sustainability throughout our supply chain. The Company has a Supplier code of conduct and Materials Policy which outlines the expectations of working with suppliers in terms of various ESG concerns. ESG clauses are also incorporated in the Company's agreements with major suppliers/contractors engaged with Sunteck.

The Company makes every effort to source product locally within a defined boundary from its project site. Local product sourcing enables the Company to cut down on the emissions and energy use involved in transporting and storing such goods. Moreover, it fosters the facilitation and creation of additional business and job opportunities for local vendors and suppliers, thereby generating a positive impact on the local economy.

100% of our inputs were sourced from suppliers who are covered by Sunteck's supplier code of conduct. Also, during 2022-23, we locally procured 90% of the materials for our development portfolio with overall 32% recycled content materials

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

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

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

Not Applicable

Leadership Indicators

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

The Company has not conducted Life Cycle Perspective/ Assessments (LCA) for any of its services in 2022-23.

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

Not Applicable

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

Indicate input material	Recycled or re-used input material to total material
	2022-23
AAC Blocks	35%
Cement - PSC	25%
Cement - PPC	25%
Concrete	35%
Steel - TMT	30%
Structural Steel	25%

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

Not Applicable

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

Sunteck doesn't reclaim products hence Not Applicable

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Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains
Essential Indicators
1. a. Details of measures for the well-being of employees.

Category	% Of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	359	359	100%	359	100%	0	0	359	100%	0	0
Female	152	152	100%	152	100%	152	100%	0	0	0	0
Total	511	511	100%	511	100%	152	29.75%	359	70.25%	0	0
Other than Permanent employees											
Male	7	0	0	0	0	0	0	0	0	0	0
Female	15	0	0	0	0	0	0	0	0	0	0
Total	22	0	0	0	0	0	0	0	0	0	0

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

2. Details of retirement benefits.

Benefits	2022-23			2021-22		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	87.87	0	Yes	87.87	0	Yes
Gratuity	100	0	NA	100	0	NA
ESI	0	0	0	0	0	0
Others - please specify	0	0	0	0	0	0

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

3. Accessibility of workplaces

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

No.

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

Equal opportunity has been enshrined within the Suntecks Human Rights Policy. The Company endeavors to providing equal opportunities of employment and non-discrimination in all processes including, but not limited to, recruiting, hiring, termination and promotion. Employment practices at Sunteck are contingent solely on

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the merit of an individual, irrespective of race, color, religion, creed, caste, economic or social status, gender, nationality, citizenship, age, sexual orientation, physical disability, childbirth, marital status, medical condition, language, sexual orientation, or any other characteristic. Our determination extends to any other protected classes which may exist under applicable law. Strict opposition is maintained to any form of discrimination, direct or indirect. Further details within human rights policy can be found at: <https://www.sunteckindia.com/investor-relations#codepolicies>

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

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

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

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

Yes, the Company has formalised a Grievance Policy that forms the backbone of a robust, transparent, and fair redressal system that is easily accessible to all employees. The Policy clearly lays out the process to be followed for an employee to raise a grievance and identify the appropriate personnel for redressal. At each stage of the redressal process, maintaining confidentiality and protecting the identity of the aggrieved employee is a critical priority. Further details can be found at: <https://www.sunteckindia.com/investor-relations#codepolicies>

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

There are no employee associations recognised by the Company.

8. Details of training given to employees and workers:

Category	2022-23					2021-22				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	359	359	100%	359	100%	327	0	0	138	42.2%
Female	152	152	100%	152	100%	130	121	93.08%	59	45.38%
Total	511	511	100%	511	100%	457	121	26.48%	197	43.11%
Workers										
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

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

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

Category	2022-23			2021-22		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	359	214	59.61%	327	210	64.22%
Female	152	92	60.53%	130	91	70%
Total	511	306	59.88%	457	301	65.86%
Workers						
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Total	0	0	0	0	0	0

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

Note: The 41% of employees didn't receive any career development rewards as they either were not eligible due to being on probation or they joined the Company in that FY, hence weren't eligible under Sunteck's performance appraisal cycle.

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

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

The Company has a well-defined Occupational Health and Safety Management System which includes, OHS Manual and supporting processes to ensure the safety and well-being of its employees and worker.

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

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

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

Safety is the foundation for all our operations, and includes all aspects, people safety, environmental safety, process safety, chemical safety, transportation safety and asset integrity. With competent employees and contractors, we take effective measures to eliminate hazards, reduce risks and prevent incidents. Sunteck

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Realty Limited ensures to set up a Hazard Identification and Risk Assessment (HIRA) team which is constituted at each site. A comprehensive plan has been developed to assist the project team in developing the project-specific Hazard Identification, Risk, and Opportunity Assessment as a proactive control measure. Routine inspections are carried out to identify any variation in processes or operations and covers inspection of various measures such as facility safety, occupational safety, chemical safety, fire safety, equipment safety etc.

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

Yes, the Company has an OHS management process where workers when faced with any inconvenience are encouraged to report OHS risks with the site team and safety manager. At each site, safety officers maintaining an incident reporting system, while safety managers ensure that all observations are thoroughly addressed through appropriate corrective actions and preventive measures.

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

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

For workers, the facets of Occupational Health and Employee Welfare form the cornerstone of our operations to safeguard worker wellbeing and foster a secure workspace. In pursuit of this objective, Sunteck has meticulously curated a comprehensive suite of provisions encompassing physical wellness initiatives such as Medical Health Camp conducted for all workers including twice a week consultation and medication if required free of cost.

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

Safety Incident/Number	Category	2022-23	2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one Million-person hours worked)	Employees	0	NA
	Workers	0	NA
Total recordable work-related injuries	Employees	0	NA
	Workers	10	NA
No. of fatalities	Employees	0	NA
	Workers	0	NA
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	NA
	Workers	0	NA

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

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

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

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For our projects, the site teams are also trained on safety parameters to ensure that they are familiar with best practices. Initiatives at the site include induction trainings, mock drills, firefighting training, and health and medical check-ups. Occupational health and safety risks identified are typical to our nature of operations including workplace ergonomic risks arising due to computer usage at workstations, indoor air quality, workplace illumination, noise, and fire risk typical to an office building; and general risks including slips, trips, falls, electrical shock, etc

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

Benefits	2022-23			2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	NA	0	0	NA
Health & Safety	0	0	NA	0	0	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	100%
Working Conditions	100%

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

Throughout the year, health and safety evaluations were carried out, and no substantial risks or issues emerged. However, few near miss incidents related to slips, trips, leg, and finger injuries. These incidents were thoroughly investigated, appropriate corrective measures were taken, and preventive steps were implemented to avoid any such occurrences in the future.

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

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

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

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

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

Gender	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	
	2022-23	2021-22	2022-23	2021-22
Employees	0	0	0	0
Workers	0	0	0	0

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

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

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

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety conditions	For the 2022-23, no specific assessments have been carried out for the value chain partners. However, the Company has outlined the highest standards of health, safety, and working conditions in its Code of Conduct. The Company actively promotes and encourages its value chain partners to prioritise and uphold health and safety practices, as well as maintain proper working conditions.
Working conditions	

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

As there have not been any assessments done for the 2022-23, no corrective action plans have been developed to address significant risks / concerns.

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

Essential Indicators

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

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

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

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	<ul style="list-style-type: none"> One-on-one interactions Customer meets Customer relationship portal -Life@Sunteck Customer helpline Media Website Periodic structured feedback meetings 	<ul style="list-style-type: none"> Ongoing Need based 	<ul style="list-style-type: none"> Customer experience and service quality Product features and benefits Timely delivery Grievance redressal
Vendors / Suppliers	No	<ul style="list-style-type: none"> Meetings Emails Letters 	<ul style="list-style-type: none"> Ongoing Need based 	<ul style="list-style-type: none"> Product and service quality and support Contract support on commercial and technical T&C Compliance with Supplier Code of Conduct Suppliers' statutory compliances
Employees	No	<ul style="list-style-type: none"> Induction programme Emails Leadership meetings Employee engagement initiatives Rewards and recognition programmes Employee portal HR helpdesk Employee volunteering initiatives 	<ul style="list-style-type: none"> Ongoing Need based 	<ul style="list-style-type: none"> Policies and procedures Performance appraisal and rewards Training and career development Work environment Health and wellness Safety and security Community development Employee volunteering

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

Leadership Indicators

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

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

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

Yes, the Company has conducted a materiality assessment with all key stakeholders Customers, employees, vendors & suppliers, contractors, investors, banks and NGO's) to identify material issues. Regular engagement with various stakeholders ensures that expectations are identified in a timely manner and are addressed responsibly. The Company has formulated the policies and adopted best practices in its volition. However, while formulating polices and adopting the same, the Company has been sensitive to the stakeholder's interest. Sunteck Saathi, an ESG initiative is emblematic of a culture of inclusive growth for those who matter the most. It is one-of-its-kind initiative that seeks to strike a chord with all the partners starting from employees, suppliers,

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channel partners, customers, investors, and the community. The objective is to cultivate a feeling of inclusion and participation among all individuals involved with the Company, driven by a sincere aspiration to facilitate favorable transformation and advancement for the individual.

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

Our in-house CSR team, along with our CSR partner SAMHITA, actively engages with local communities to gain a deep understanding of their challenges. Under Sunteck Saathi program, with a vision to promote accessible and affordable healthcare services in India, Sunteck has organised a Health Screening Camp for Children at Naigaon Shelter Home. This impactful initiative aimed to prioritise the well-being of young individuals by focusing on essential aspects of their health. The camp encompassed comprehensive eye health assessments, dental check-ups, and thorough general body examinations. To further encourage a healthy lifestyle, every beneficiary receives a specially curated nutrition kit. The camp garnered tremendous participation, benefiting over 200 kids who found invaluable support through this remarkable screening program.

Principle 5: Businesses should respect and promote human rights

Essential Indicators

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

Category	2022-23			2021-22		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
Employees						
Permanent	0	0	0	0	0	0
Other than permanent	0	0	0	0	0	0
Total employees	0	0	0	0	0	0
Workers						
Permanent	0	0	0	0	0	0
Other than permanent	0	0	0	0	0	0
Total workers	0	0	0	0	0	0

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

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

Category	2022-23					2021-22				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	511	0	0	511	100%	457	0	0	457	100%
Male	359	0	0	359	100%	327	0	0	327	100%
Female	152	0	0	152	100%	130	0	0	130	100%
Other than permanent	22	0	0	22	100%	19	0	0	19	100%
Male	7	0	0	7	100%	5	0	0	5	100%
Female	15	0	0	15	100%	14	0	0	14	100%

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Category	2022-23					2021-22				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C / A)		No. (E)	% (E/D)	No. (F)	% (F / D)
Workers										
Permanent	0	0	0	0	0	0	0	0	0	0
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
Other than permanent	0	0	0	0	0	0	0	0	0	0
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0

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

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

Gender	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	5	11,250,000	2	6,009,878
Key Managerial Personnel*	1	4,930,943	0	-
Employees other than BoD and KMP	357	751,000	150	700,002
Workers	0	-	-	-

*Note: Key Management Personnel (KMP) includes the Executive Chairperson, Executive Directors, Chief Financial Officer (CFO) and Company Secretary (CS) but the said personnel are included in Board of Directors except Chief Operating Officer (CFO) hence we have considered them as Board Of Directors for providing the above details.

The Board of Directors consists of four independent directors (three males and one female) which are paid sitting fees. Hence, the figures for BOD have been provided accordingly.

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

Yes, the Company has adopted a Grievance Redressal Policy to develop and maintain an effective, timely, fair, and equitable grievance handling system which is easily available and offered to all Sunteck's employees. A Code of Conduct that outlines the norms, employee responsibilities and acceptable employee conduct has also been formalised and compliance with the same is mandatory for all employees.

Human resource team is responsible for human rights impacts and issues arising within the Company. There is zero tolerance for sexual harassment at workplace. A specific committee constituted in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 to handle any complaints or concerns with respect to sexual harassment has also been established.

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

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

ANNEXURE III (Contd.)

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

	2022-23			2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour/ Involuntary Labour	0	0	NA	0	0	NA
Wages	0	0	NA	0	0	NA
Other human rights related issues	0	0	NA	0	0	NA

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

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

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

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

9. Assessments of the year

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

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

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

As there hasn't been any assessment conducted for the 2022-23, no corrective action plans have been developed to address significant risks / concerns.

ANNEXURE III (Contd.)

Leadership Indicators

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

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

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

Currently, Sunteck does not conduct human rights due diligence. Sunteck is involved in vulnerability mapping for their respective areas of business and will undertake due diligence in subsequent financial year

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

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

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

Not applicable.

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

Essential Indicators

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

Parameter	Unit	2022-23	2021-22
Total electricity consumption (A)	GJ	6,200.35	5,675.88
Total fuel consumption (B) - Diesel	GJ	115.77	829.25
Energy consumption through other sources (C)	GJ	0	0
Total energy consumption (A+B+C)	GJ	6,316.12	6,505.13
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	GJ/Lakh ₹	0.1742	0.2816
Energy intensity (optional) - the relevant metric may be selected by the entity	GJ/sq. ft	0.00123	0.0144

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

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

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

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

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

Efforts have been made by the Company to manage and reduce its water consumption. Efficient utilisation of water is one of the most important parameters of the Company's sustainability agenda. The Company has installed water meters at various projects to actively monitor water consumption level.

ANNEXURE III (Contd.)

Parameter	2022-23	2021-22
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	3,450	0
(iii) Third party water (Municipal water supplies)	2,010,110	90,640
(iv) Seawater / desalinated water	0	0
(v) others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	2,013,560	90,640*
Total volume of water consumption (in kilolitres)	2,013,560	90,640*
Water intensity per rupee of turnover (Water consumed / turnover) (Unit: KL/Lakh ₹)	55.5541	3.9249
Water intensity (optional) - the relevant metric may be selected by the entity	0	0

*We were at a nascent stage during 2021-22 in maintaining our performance metrics and couldn't draw accurate data for water consumption basis which figure of 90.64 megalitres is an approximate one

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

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

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

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

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

Parameter	Please specify unit	2022-23 (Current Financial Year)	2021-22 (Previous Financial Year)
NO _x	mg/m ³	0.08	0.08
SO _x	mg/m ³	0.08	0.08
Particulate matter (PM)	mg/m ³	0.06	0.06
Persistent organic pollutants (POP)	mg/m ³	NA	NA
Volatile organic compounds (VOC)	mg/m ³	NA	NA
Hazardous air pollutants (HAP)	mg/m ³	NA	NA
Others - please specify	mg/m ³	-	-

Note: We carried out an air quality assessment across all our sites, including the headquarters, and the results state that we are well within specified values listed as per MPCB. Additionally, we ascertain that all our emission parameters adhere to the thresholds established by the Maharashtra Pollution Control Board (MPCB).

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

Parameter	Unit	2022-23	2021-22
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	30.10	61.45

ANNEXURE III (Contd.)

Parameter	Unit	2022-23	2021-22
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	1,395.08	1245.54
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO ₂ equivalent/ Lakhs ₹	0.0384	0.0539
Total Scope 1 and Scope 2 emission intensity (optional) - the relevant metric may be selected by the entity	tCO ₂ e/sq. ft.	0.00027	0.00306

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

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

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

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

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

Parameter	2022-23	2021-22
Total Waste generated (in metric tonnes)		
Plastic waste (A)	0	0
E-waste (B)	0	0
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	16,281.77	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	0	0
Other Non-hazardous waste generated (H) . Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	0	0
Steel scrap (I)	376.60	307.12
Miscellaneous (J)	49.53	4.33
Total (A+B + C + D + E + F + G + H)	16,707.90	311.45
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	426.13	299.28
(ii) Re-used	6,497.1	0
(iii) Other recovery operations	0	0
Total	6,923.23	299.28

ANNEXURE III (Contd.)

Parameter	2022-23	2021-22
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste	2022-23	2021-22
(i) Incineration	0	0
(ii) Landfilling	9,784.67	12.17
(iii) Other disposal operations	0	0
Total	9,784.67	12.17

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency - Sunteck recognises the importance of monitoring and recording the environmental impacts of the Company's operations. This is undertaken internally in a robust manner. However, no independent assessment/ assurance is carried out by external agencies.

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

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

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

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

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes/No)	Relevant Web link
Proposed expansion of Township development comprising of Residential building with shops at land bearing S. No.2, H.No.-3, S. No. 3, H. No. 1,7,8,10, S. No. 4, H. No. 1,3,6,8,12,19,20, S. No. 5	EC22B039 MH187085	30/07/2022	Yes	Yes	https://environmentclearance.nic.in/TrackState_proposal.aspx?type=EC&status=EC_new&statername=Maharashtra&pno=SIA/MH/MIS/261906/2022&pid=200545

ANNEXURE III (Contd.)

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

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

Leadership Indicators

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

Parameter	2022-23	2021-22
From renewable sources		
Total electricity consumption (A) in kWh	0	0
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C) in kWh	0	0
From non-renewable sources		
Total electricity consumption (D)	6,200.35 GJ	5,675.88 GJ
Total fuel consumption (E)	115.77 GJ	829.25 GJ
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	6,316.12 GJ	6,505.13 GJ

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

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

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

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

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

Efforts are underway to track and record this data and it will be made available from 2023-24.

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

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

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

S. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	EDGE building certification	EDGE- IFC, a member of World Bank Group is a green building standard aimed at making buildings more resource-efficient	Target of making projects 20% more resource-efficient

ANNEXURE III (Contd.)

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

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

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

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

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

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

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

ANNEXURE III (Contd.)

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

Essential Indicators

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

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

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

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	The Associated Chambers of Commerce of India (AASOCHAM)	National
2	National Real Estate Development Council (NAREDCO)	National
3	CREDAI-MCHI (Maharashtra Chamber of Housing Industry)	State
4	IMC (Chambers of Commerce and industry)	National
5	EDGE (Excellence in Design for Greater Excellence)	International
6	LEED (Leadership in Energy and Environmental Designs)	International

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

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

Leadership Indicators

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

Sunteck does not publicly advocate any policies.

PRINCIPLE 8 Businesses should promote inclusive growth and equitable development

Essential Indicators

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

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

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

No Rehabilitation and Resettlement project were undertaken during 2022-23.

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

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

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

ANNEXURE III (Contd.)

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

	2022-23	2021-22
Directly sourced from MSMEs/ small producers	26.45%	19.56%
Sourced directly from within the district and neighboring districts	89.04%	92.19%

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

Not Applicable

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

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

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

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

b. From which marginalised /vulnerable groups do you procure?

Not Applicable

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

Not Applicable

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

Not Applicable

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

Not Applicable

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefited from CSR Projects	% Of beneficiaries from vulnerable and marginalised groups
1.	Beach Cleanup & Awareness sessions on marine pollution	Our Beach cleanup activity helped community on large scale & awareness session had a positive impact on 424 students in FY23	NIL
2.	Sunteck Social Protection program (Haqdarshak)	1,357 beneficiaries (workers)	NIL
3.	Healthcare camp for shelter home children	200 beneficiaries	NIL

ANNEXURE III (Contd.)

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

Essential Indicators

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

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

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

Not Applicable

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

	2022-23		Remarks	2021-22		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	52	0	None	56	0	None

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

Not Applicable

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

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

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

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

ANNEXURE III (Contd.)

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

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

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

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

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

Not Applicable

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

No

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

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

6. Provide the following information relating to data breaches:**a. Number of instances of data breaches along-with impact**

NIL.

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

Nil