



Ref No: APTUS/10-JUL/2024-25

July 22, 2024

To, BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001 Scrip Code: 543335	To, National Stock Exchange of India Ltd., Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E) Mumbai - 400 051 Scrip Symbol: APTUS
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Dear Sir/Madam,

Sub: Business Responsibility and Sustainability Reporting (BRSR) for Financial Year 2023-24.

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

The Business Responsibility and Sustainability Report and Annual Report for the Financial Year 2023-24 is also made available on the website of the Aptus Value Housing Finance India Limited and can be accessed at www.aptusindia.com

Please take the same on record.

Thanking you,

For Aptus Value Housing Finance India Limited

Sanin Panicker
Company Secretary & Compliance Officer

Annexure – E

Business Responsibility & Sustainability Report

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

- CIN:** L65922TN2009PLC073881
- Name of the Listed Entity:** Aptus Value Housing Finance India Limited
- Year of incorporation:** 2009
- Registered office address:** No. 8B, Doshi Towers, 8th Floor, No:205, Poonamallee High Road, Kilpauk, Chennai - 600010.
- Corporate address:** No. 8B, Doshi Towers, 8th Floor, No:205, Poonamallee High Road, Kilpauk, Chennai - 600010.
- E-mail:** cs@aptusindia.com
- Telephone:** +91 044 4565 0000
- Website:** www.aptusindia.com
- Financial year for which reporting is being done:** April 01, 2023 - March 31, 2024
- Name of the Stock Exchange(s) where shares are listed:** BSE & NSE

- Paid-up Capital:** Rs. 99,78,48,002
- Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:** Mr. Sanin Panicker, Company Secretary and Compliance officer, cs@aptusindia.com, Tel: +91 044 4565 0000
- Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together):** The disclosures under this report are made on a consolidated basis, unless otherwise specified.
- Name of assurance provider: As per SEBI Circular No.: SEBI/HO/CFD/CFD-SEC2/P/CIR/2023/122, the Company is not required to undertake reasonable assurance of the BRSR Core for the Financial Year 2023-2024
- Type of assurance obtained: Not Applicable

II. 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
1.	Financial services	The Company provides long term housing finance and loans against property	100%

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

S. No.	Product/Service	NIC Code	% of Turnover of the entity
1.	The primary product offered by the Company are Home Loans for construction or purchase of houses/ flats and for house renovation/extension. In addition to home loans, the Company offers Loan against Property for refinancing of funds used for the purpose of construction/ purchase of house. Aptus Finance India Private Limited, the wholly owned subsidiary of the Company is engaged in the business of providing finance in the form of loan against immovable properties.	64910	100%

III. Operations

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

Location	Number of plants	Number of offices	Total
National	NA*	262	262
International	NA	Nil	Nil

*The Company and its subsidiary are Non-Banking Financial Companies and hence does not undertake manufacturing activities

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	6
International (No. of Countries)	Nil

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

NIL

c. Types of customers and beneficiaries.

The Company is primarily focused in serving the low and middle income self-employed customers in the rural and semi-urban markets of India.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Employees						
1.	Permanent	2,918	2,817	97%	101	3%
2.	Other than Permanent	Nil	Nil	Nil	Nil	Nil
3.	Total employees	2,918	2,817	97%	101	3%
Workers						
4.	Permanent	Nil	Nil	Nil	Nil	Nil
5.	Other than Permanent	Nil	Nil	Nil	Nil	Nil
6.	Total workers	Nil	Nil	Nil	Nil	Nil

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	Nil	Nil	Nil	Nil	Nil
2.	Other than Permanent	Nil	Nil	Nil	Nil	Nil
3.	Total differently abled employees	Nil	Nil	Nil	Nil	Nil
Differently Abled Workers						
4.	Permanent	Nil	Nil	Nil	Nil	Nil
5.	Other than permanent	Nil	Nil	Nil	Nil	Nil
6.	Total differently abled workers	Nil	Nil	Nil	Nil	Nil

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors*	11	1	9.09
Key Management Personnel#	4	0	0.00

*Includes Board members of the Wholly owned subsidiary.

#Includes Key Managerial Personnel of the Wholly owned subsidiary but does not include the Executive Chairman and Managing Director of the Company

22. Turnover rate for permanent employees and workers

	FY 2024			FY 2023			FY 2022		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	20%	3%	23%	22%	1%	23%	18%	1%	19%
Permanent Workers	-	-	-	-	-	-	-	-	-

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

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

S. No.	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Aptus Finance India Private Limited	Wholly Owned Subsidiary	100%	Yes

VI. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes

- Turnover (in Rs.):** 1,365.18 Crs
- Net worth (in Rs.):** 3,767.92 Crs

VII. Transparency and Disclosures Compliances

25. 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) (If Yes, then provide web-link for grievance redress policy)	2024			2023		
		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	-	-	-	-	-	-
Investors (other than shareholders)	Yes	-	-	-	-	-	-
Shareholders	Yes	42	-	-	47	-	-
Employees and Workers	Yes						
Customers	Yes	299	-	-	579	-	-
Value Chain Partners	Yes	-	-	-	-	-	-
Others	-	-	-	-	-	-	-

A strong whistleblower policy is available to all our stakeholders. (Weblink: [Whistle Blower Policy](#))

The Company has also adopted the Grievance Redressal Policy to redress and resolve the customer's complaints (Weblink: [Grievance Redressal Policy](#))

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

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.	Affordable Housing	Opportunity	With a growing population and increasing urbanization, there is a huge demand to provide affordable and adequate housing options for everyone. In India, affordable housing finance institutions have emerged to bridge this gap and offer accessible financial solutions to those seeking affordable homes.	-	Positive Aptus emphasizes its commitment to financial inclusion by extending credit to individuals who may have limited access to formal financial services. This contributes to the overall economic development of the country and supports the upliftment of marginalized sections of society.
2.	Skilled workforce	Opportunity	The Company employs loan officers, underwriters, customer service representatives, and other professionals who contribute to its success. Aptus invests in continuous training and development programs to enhance the expertise of its employees. At Aptus, we value diversity and inclusivity. Our workforce comprises individuals from different age groups, bringing a rich range of experiences and perspectives.	-	Positive By fostering employee engagement and retention, Aptus ensures a motivated and productive workforce, enabling efficient loan origination, servicing, and risk management processes.
3.	Financial Resources	Opportunity & Risk	The Company has established strong lender relationships, including partnerships with key players. This enhances Aptus' ability to provide affordable housing finance to a wide range of customers across the country. Moreover, Aptus has established a valuable relationship with International Finance Corporation (IFC), which is part of the World Bank Group. This partnership highlights Aptus' global recognition and alignment with international standards in the affordable housing finance sector.	Aptus has implemented an optimum borrowing mix of fixed and floating rate linked loans and ensure diversified resource raising options to minimize cost and maximize stability of funds.	Positive By effectively managing its financial capital, Aptus aims to maintain a sustainable and profitable loan portfolio, leading to increased shareholder value and returns on investment. By nurturing strong relationships with financial partners, Aptus gains access to diverse funding options, market insights, and expertise. These relationships provide a solid foundation for the Company's growth and expansion, enabling it to meet the housing finance needs of a larger customer base.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4.	Government subsidy schemes	Opportunity	<p>The Pradhan Mantri Awas Yojana (PMAY) is a flagship housing project launched by the Government of India with the primary objective of providing affordable housing to all citizens of the nation.</p> <p>The Credit-Linked Subsidy Scheme (CLSS) under PMAY has made homeownership more affordable for many low-income groups. Beneficiaries receive interest subsidies on home loans, making housing finance more accessible and attractive.</p>	-	<p>Positive</p> <p>This initiative has not only transformed the housing landscape in India but has also improved the lives of millions of people by addressing the issue of housing shortage and slum rehabilitation.</p>
5.	Customer welfare	Opportunity	<p>Aptus takes a customer-centric approach by actively engaging with its customers and understanding their business ventures, income generation, aspirations, dreams, and lifestyle. The Company does not mandate stringent income documents from customers, which may not be available with our target informal segment customers, but emphasizes on personal discussions to assess suitability and eligibility for housing loans.</p>	-	<p>Positive</p> <p>Positive reputation, loyalty, and efficient customer servicing results in increased customer retention yielding portfolio sustenance and high turnover to the Company to serve a larger number of low and middle income families in affording home.</p>

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 National Guidelines on Responsible Business Conduct (NGRBC) Principles and Core Elements.

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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	N	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	All the policies adopted by the Company are approved by Board								
c. Web Link of the Policies, if available	Policies								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes, the Company has translated the policies in to procedures with respect to the activities carried out by the Company								
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes, certain policies of the Company also extends to our value chain partners								
4. Name of the national and international codes/ certifications/labels/ standards adopted by your entity and mapped to each principle.	The Company is ISO/IEC 27001:2013 Certified for Information Security Management System								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.									
A. Strategic Priorities	<ul style="list-style-type: none"> Continue to focus on low- and middle-income self-employed customers in rural and semi-urban markets. Increase penetration in the existing markets and expand branch network in large housing markets. Continue to be an asset quality focused financier and cost efficient. Prudent ALM, gearing and access to low-cost funds from diverse sources 								
B. Goals and targets for 2025:	<ul style="list-style-type: none"> To provide affordable home loans and empower low and middle-income households while setting pioneering standards in underserved markets. Expand branch network strategically into additional geographies and segments that require affordable housing finance, aligning with the Government of India's Housing for All initiative. Facilitate Pradhan Mantri Awas Yojana (PMAY) benefits to eligible customers, thereby enhancing accessibility to housing finance solutions and supporting broader financial inclusion efforts. 								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	<p>The Company has met all the goals and targets which are as follows:</p> <ul style="list-style-type: none"> The Company has increased the penetration of referral app usage and increased the customer base to 1,33,499 The Company started its operations in new state 'Maharashtra'. The branches of the Company has increased from 231 to 262 Increased penetration of e-sign and e-stamping of customer agreements Fortified loan origination and management system to substitute paper in the entire lifecycle of a loan. 								
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) – Please refer the letter from Chairman on page no. 03									
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. M. Anandan Executive Chairman DIN: 00033633								
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.	<p>Yes. The Executive Chairman along with senior management of the Company monitors various aspects of social, environmental, governance and economic responsibilities of the Company on a continuous basis.</p> <p>The CSR committee of the Board also reviews the updates on regular basis.</p>								

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)
Performance against above policies and follow up action	The Company on a periodic basis, reviews the performance against the above policies, and changes are implemented as required.	
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The Company is in compliance with the regulations to the extent applicable.	
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.	No	independent assessment/ evaluation is carried by external agency. However, all policies of the Company are reviewed internally by the Board at least once in a year.

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the Principles material to its business (Yes/No)							Y		
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

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 categorized 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	Percentage of persons in respective category covered by the awareness programmes
Board of Directors	3	Familiarization Program	100
Key Managerial Personnel	2	Leadership development & Familiarization program	100
Employees other than BoD and KMPs	30	Skill upgradation, health and safety and Prohibition of sexual harassment	85
Workers	-	-	-

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

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	Nil	Nil	Nil	Nil	Nil
Settlement	Nil	Nil	Nil	Nil	Nil
Compounding fee	Nil	Nil	Nil	Nil	Nil
Non-Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	Nil	Nil	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	Nil	Nil

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
No instances of any monetary or non-monetary actions against the Company, Directors/KMPs.	

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

Yes, the Company has adopted anti-bribery & anti-corruption policy which is applicable to the Directors and employees of the Company and its subsidiary.

[Weblink for Anti-Bribery & Anti-Corruption Policy](#)

5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption during the financial year (FY 2024) and during the previous financial year (FY 2023)

	FY 2024	FY 2023
Directors	Nil	Nil
KMP's	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

	FY 2024		FY 2023	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	Nil	Nil	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	Nil	Nil	Nil

7. Any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest: Not applicable

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

	FY 2024	FY 2023
Number of days of accounts payables	Due to the nature of our business, disclosure under this requirement is not relevant/applicable to us	

9. Open-ness of business

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

Parameter	Metrics	FY 2024	FY 2023
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	Nil	Nil
	b. Number of trading houses where purchases are made from	Nil	Nil
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	Nil	Nil
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	Nil	Nil
	b. Number of dealers / distributors to whom sales are made	Nil	Nil
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	Nil	Nil
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	Nil	Nil
	b. Sales (Sales to related parties / Total Sales)	Nil	Nil
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	4.02%	4.68%
	d. Investments (Investments in related parties / Total Investments made)	Nil	Nil

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
	Nil	

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

Yes. The Company has adopted a code of conduct for the Board of Directors to avoid situations in which their personal interests could conflict with the interests of the Company.

[Weblink for Code of Conduct](#)

The Directors do not participate in the discussion or voting thereof, with respect to any transaction in which they are interested.

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

Essential Indicators

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

	FY 2024	FY 2023	Details of improvements in environmental and social impacts
R&D			-
Capex	0.19%	0.14%	Due to the nature of our pre-dominantly digital processes resulting from the investments in digitalisation and automation initiatives, our Capex largely consists of expenses relating to purchase of softwares/ other IT related expenses. Our investment into digitalisation is also aimed at making our environment paper less contributing to the wellness of our eco system and society at large.

- 2. Does the entity have procedures in place for sustainable sourcing? If yes, what percentage of inputs were sourced sustainably?**

Housing finance, the core of our business, primarily involves the management and allocation of financial resources rather than the use of tangible raw materials typically associated with sustainability concerns. Consequently, our operations do not necessitate the implementation of procedures for sustainable sourcing, as we do not engage with physical resources that would require such measures.

- 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.**

Since the Company is a housing finance company, the key waste products are primarily e-waste and paper waste. The Company has put in place an environment-friendly system for management of its e-waste and paper waste. Further, the Company is in the process of implementing a 100% paperless office

- 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.**

EPR is not applicable for the Company.

Leadership Indicators

- 1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its services (If yes, give details in the following format)**

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/ No)	Results communicated in the public domain (Yes/No) If yes, provide the weblink
64910	Housing Finance Activities	100%	2023-24	No	The entire life cycle assessment of Company's business operations is presented in the Public Offer Document of the Company: Weblink for RHP

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

Name of the Product/Service	Description of the risk	Action Taken
	Not applicable	

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

Indicate input material	Recycled or re - used input material to total material	
	FY 2024	FY 2023
	NA	NA

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

	FY 2024			FY 2023		
	Re-used	Recycled	Safely Disposed	Re-used	Recycled	Safely Disposed
Plastics (including packaging)						
E-waste			NA			NA
Hazardous waste						
Other waste						

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
	Not Applicable

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

Essential indicators

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

The Company has adopted (i) health and safety policy and (ii) diversity and inclusion policy for the well-being of the employees (weblink: [Health and Safety Policy](#) and [Diversity and Inclusion Policy](#)).

Further all the employees are protected with hospitalization insurance, personal accidental cover and group term life insurance.

The Company has embraced an Equal Employment Opportunity Policy to guarantee a workplace free from discrimination. This policy ensures that all employees are treated equitably, regardless of age, gender, race, national or ethnic origin, language, religion, political beliefs, sexual orientation, or physical ability.

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	2,817	1,587	56%	2,817	100%	0	0%	0	0	0	0
Female	101	68	67%	101	100%	90	89%	0	0	0	0
Total	2,918	1,655	57%	2,918	100%	90	89%	0	0	0	0
Other than Permanent Employees											
Male	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Female	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Total	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil

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

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 Workers											
Male	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Female	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Total	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Other than Permanent Workers											
Male	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Female	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Total	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil

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

	FY 2024 (Current Financial Year)	FY 2023 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the Company	0.25%	0.21%

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

Benefits	FY 2024			FY 2023		
	Current Financial Year			Previous Financial Year		
	No. of employees covered as a % of total employees	No. of employees 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 employees covered as a % of total Workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	NA	Y	100%	NA	Y
Gratuity	100%	NA	NA	100%	NA	NA
ESI	42%	NA	Y	50%	NA	Y

3. Accessibility of workplaces

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

The Company does not have any disabled employees on its rolls as at the end of the financial year under review. However, your Company's premises/offices are accessible to people with disabilities, as per the requirements of the Rights of Persons with Disabilities Act, 2016.

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

Yes, the Company has adopted Equal Employment Opportunity Policy to ensure that there is no discrimination between employees on the grounds of age, gender, race, national or ethnic origin, language, religion, political beliefs, sexual orientation or physical ability and the same is available on the website of the Company. (Weblink for [Equal Employment Opportunity Policy](#))

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	-	-	NA	NA
Female	100%	100%	NA	NA
Total	100%	100%	NA	NA

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

	Details of the Mechanism
Permanent workers	Not Applicable
Other than permanent workers	Not Applicable
Permanent employees	Yes. The Company has developed an online HR management system to enable the employees to raise general grievances/confidential concerns to the HR department.
Other than permanent employees	Not Applicable

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

The Company does not have any employees/workers associations.

Category	FY 2024			FY 2023		
	Total Employees / Workers (A)	No of employees or workers who are part of the association (B)	% B/A	Total Employees / Workers (A)	No of employees or workers who are part of the association (B)	% B/A
Total Permanent Employees						
Male						
Female						
Total Permanent Workers						
Male						
Female						

8. Details of training given to employees and workers

Category	FY 2024						FY 2023			
	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)
Male	2,817	2,282	81%	2,282	81%	2,328	1,915	82%	1,915	82%
Female	101	74	73%	74	73%	77	55	71%	55	71%
Total	2,918	2,356	81%	2,356	81%	2,405	1,970	81%	1,970	81%

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

Category	FY 2024			FY 2023		
	Total (A)	Employees covered (B)	% (B/A)	Total (C)	Employees covered (D)	% (D/C)
Employees						
Male	2,817	2,133	76%	2,328	1,915	82%
Female	101	89	88%	77	55	71%
Total	2,918	2,222	76%	2,405	1,970	81%
Workers						
Male	Nil	Nil	Nil	Nil	Nil	Nil
Female	Nil	Nil	Nil	Nil	Nil	Nil
Total	Nil	Nil	Nil	Nil	Nil	Nil

10. Health and safety management system:

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

Yes, the Company has implemented a comprehensive health and safety policy aimed at fostering a secure work environment devoid of violence, harassment, intimidation, and other hazards stemming from both internal and external sources. Additionally, all employees benefit from coverage under hospitalization insurance, personal accidental cover, and group term life insurance, ensuring their well-being and protection.

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

The Company is engaged in the business of providing housing financial service which inherently involves minimal work-related hazards. As a result, the processes typically required to identify and assess routine and non-routine work-related risks are not necessary for our operations.

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

The Company operates in the housing finance loan services industry and does not employ any workers who encounter the risk of work-related hazards. Consequently, this requirement does not pertain to our operations.

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

Yes, all employees of the Company are provided with comprehensive coverage, including hospitalization insurance, personal accidental cover, and group term life insurance.

11. Details of Safety Related Incidents.

Safety Incident	Category*	2024	2023
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees Workers		
Total recordable work-related injuries	Employees Workers		Nil
No of Fatalities	Employees Workers		
High consequence work-related injury or ill-health (excluding fatalities)	Employees Workers		Nil

* Including in the contract workforce.

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

We prioritize the establishment of a secure work environment, ensuring it remains free from any form of violence, harassment, intimidation, or disruptive conditions arising from both internal and external sources. All our employees operate within a low-risk environment, minimizing exposure to significant occupational health and safety hazards.

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

	FY 2024			FY 2023		
	Filed During the Year	Pending Resolutions end of the year	Remarks	Filed During the Year	Pending Resolutions end of the year	Remarks
Working Conditions	Nil	Nil	Nil	Nil	Nil	Nil
Health and safety	Nil	Nil	Nil	Nil	Nil	Nil

14. Assessments of the year

	% of Offices/Branches Assessed by the entity or by the authorities or third parties
Health & Safety Practices	100%
Working Conditions	100%

15. 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.

No corrective action plan has been necessitated for the above-mentioned parameters. However, the Company has conducted training programmes to create awareness among the employees regarding workplace safety.

Leadership indicators

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

(A) Employees:

Yes. The Company has hospitalization insurance, personal accidental cover and group term life insurance for the employees. In case of death of an employee, the Company ensures a prompt and efficient payout from the employee's life insurance policy by assisting the employee's family in necessary paperwork and claim procedures. Further for employees who were granted stock options under the ESOP schemes of the Company, the unvested options shall immediately vest with the nominee of such employee upon his death.

(B) Workers:

Not Applicable

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

We have established a periodic internal audit mechanism to ensure that statutory dues have been deducted and deposited by the value chain partners. We further conduct risk assessments to identify potential areas of non-compliance and taking proactive measures to address them.

3. 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.

	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	
	FY2024	FY 2023	FY2024	FY 2023
Employees	Nil	Nil	Nil	Nil
Workers	Nil	Nil	Nil	Nil

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

Our employees are skilled and developed due to the nature of the role they perform and the training programmes they were put through during their tenure of employment which equip them with transferability to other industries or positions, reducing the need for exclusive support. Furthermore, the average age of our employees is between 26-35, which does not currently necessitate a transition assistance program to facilitate continued employability and the management of career ending resulting from retirement.

5. Details of assessment of value chain partners

	% of value chain partners (by value of business done with such partners) that were assessed
Health & Safety Practices	Nil
Working Conditions	Nil

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

No corrective actions were required to be taken to address such 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.

We consider individuals, groups, institutions or entities that add value or constitute a core part of the business value chain as key stakeholders. Our key stakeholders include but not limited to customers, employees, investors, regulators, lenders and communities.

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

Stakeholder Group	Whether identified as vulnerable & marginalized group	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 topic and concerns raised during such engagement
Customers	Yes, if they qualify based on specific criteria such as income, gender, etc.	Customer care: Telephone and e-mail Branches: Notice Board, Standees and personal interaction Digital means: Customer App, SMS, WhatsApp, Website and Social Media platforms	Regular and need basis	Maintain close interaction with customers throughout the loan lifecycle, addressing any issues they encounter and providing updates on the Company's products and services.
Employees	No	Personal interaction, e-mails, HRMS, appraisal process, Employee engagement and training programmes	Regular and need basis	Ensuring the safety and well-being of employees while offering continuous learning and career development opportunities. Addressing employee grievances and increasing employment opportunities in rural and semi-urban areas.
Investors/ shareholders	No	E-mails, Investor meetings/ conferences, call, press releases, stock exchange intimations, investor presentations, newspapers, Annual General Meetings and annual reports.	Regular and as per statutory requirements	Regular interaction with investors/ shareholders foster trust by demonstrating that the Company values transparency, compliance and governance. It enables them to make well-informed decisions regarding their investments, provide feedback which can be valuable for the Company's improvement and strategic planning.
Regulators, Lenders and Credit rating agencies	No	E-mails, personal meetings, conference calls and regulatory filings	Regular and as per statutory requirements	Regular interaction with regulators ensures adherence to legal and regulatory requirements. Engaging with lenders helps secure ongoing financial support and favourable terms, which are vital for sustaining operations and growth. Communication with credit rating agencies is essential for maintaining a positive credit rating, which affects borrowing costs and investor confidence.

Stakeholder Group	Whether identified as vulnerable & marginalized group	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 topic and concerns raised during such engagement
Communities	No	Direct and through implementing agencies	Regular and need basis	To build trust, foster goodwill, and ensure our services meet local needs. It also demonstrates the Company's commitment to social responsibility, enhancing its reputation. This ongoing interaction not only strengthens community relations but also supports sustainable business growth by aligning Company goals with community development.

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.

Engagement with stakeholders is a continuous process and such engagement is driven by the following committees as follows:

- A. Grievance redressal committee: Regular reports from the Grievance Redressal Committee to the Board ensure that the Board of the Company are aware of ongoing issues, resolutions, and trends in grievances of customers.
- B. Stakeholder relationship committee: Regular reports to the Board providing an overview of interactions and communications with key stakeholders, including meetings, surveys, and feedback received.
- C. Corporate social responsibility committee: Regular report to the Board providing details of CSR initiatives undertaken during the reporting period, including projects, programs, and partnerships, and an analysis on outcome of the CSR initiatives undertaken in the communities.

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, continuous engagement with stakeholders helps the Company meet expectations and serve its stakeholders more effectively. The Company interacts with various stakeholders at different levels, with the relevant departments collecting feedback and implementing necessary changes. This consultation process also leads to updates in the Company's policies and procedures as needed.

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

The Company strives to make a meaningful difference in the lives of its stakeholders by focusing on key areas such as healthcare, education, and social development by continuously engaging with the customers and communities and understanding their concerns and needs.

Through its Corporate Social Responsibility initiatives, the Company has undertaken numerous projects aimed at improving healthcare access, enhancing educational opportunities, and promoting social development. These efforts reflect the Company's commitment to creating a positive impact and fostering sustainable growth within the communities it serves.

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.

The Company has Board-approved policies on the code of conduct, equal employment opportunity, diversity and inclusion, and prevention of sexual harassment. Regular training sessions are conducted for employees to familiarize them with these policies.

Additionally, these policies are available on the Company's website for easy access by employees. Furthermore, all employees receive a copy of the Employee Guide as part of their onboarding kit on their first day, to enhance their understanding of the various policies adopted by the Company.

	FY 2024			FY 2023		
	Total A	No of Employees/ workers covered (B)	% (B/A)	Total C	No of Employees/ workers covered (D)	% (D/C)
Employees						
Permanent employees	2,918	2,489	85%	2,405	1,970	81%
Other than Permanent employees	NA	NA	NA	NA	NA	NA
Total employees	2,918	2,489	85%	2,405	1,970	81%
Workers						
Permanent workers	NA	NA	NA	NA	NA	NA
Other than Permanent workers	NA	NA	NA	NA	NA	NA
Total workers	NA	NA	NA	NA	NA	NA

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

	FY 2024					FY 2023				
	Total A	Equal to Minimal Wage		More than Minimal Wages		Total D	Equal to Minimal Wage		More than Minimal Wages	
		(B)	% (B/A)	(C)	% (C/A)		(E)	% (E/D)	(F)	% (F/D)
Employees										
Permanent										
Male	2,817	-	-	2,817	100%	2,296	-	-	2,296	100%
Female	101	-	-	101	100%	64	-	-	64	100%
Other than Permanent										
Male	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Female	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Workers										
Permanent										
Male	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Female	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Other than Permanent										
Male	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Female	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil

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

The remuneration paid to the Directors and KMPs are in accordance with the Appointment, Evaluation and Remuneration Policy of the Company which is available on the website of the Company.

(Weblink for [Appointment, Remuneration & Evaluation Policy](#))

a. Median remuneration / wages:

	Male		Female	
	Number	Median remuneration/ salary/wages of respective category	Number	Median remuneration/ salary/wages of respective category
Board of Directors (BoD)	8	18,25,000	1	18,60,000
Key Managerial Personnel (KMP)	4	16,36,000	0	Nil
Employees other than BoDs and KMPs	2,811	3,14,600	101	3,68,440
Workers	Nil	Nil	Nil	Nil

(Mr. M Anandan, Executive Chairman and Mr. P Balaji, Managing Director are categorized as part of Board of Directors for the purposes of this table)

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

	FY 2024	FY 2023
Gross wages paid to females as % of total wages	4%	3%

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 set up the following Committees:

- A. Disciplinary committee to look into complaints of unethical practices against employees.
- B. Internal Complaints Committee to provide protection against Sexual Harassment of women at workplace

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

The Company has Board approved policies in place viz. grievance redressal policy, policy on prevention of sexual harassment at workplace, whistle blower policy etc. for handling the grievances of various stakeholders.

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

	FY 2024			FY 2023		
	Filed during the year	Pending resolutions end of the year	Remarks	Filed during the year	Pending resolutions end of the year	Remarks
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Discrimination at workplace	Nil	Nil	Nil	Nil	Nil	Nil
Child labour	Nil	Nil	Nil	Nil	Nil	Nil
Forced labour/Involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Wages	Nil	Nil	Nil	Nil	Nil	Nil
Other human rights related issues	Nil	Nil	Nil	Nil	Nil	Nil

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

	FY 2024	FY 2023
Total Complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013	Nil	Nil
Complaints on POSH as a % of female employees /workers	Nil	Nil
Complaints on POSH upheld	Nil	Nil

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

The Company has in place an equal employment and opportunity policy and policy on prevention of sexual harassment at workplace, in line with the regulatory protections available to the complainant and respondent as applicable. Our process and procedures carried out as per the above referred policies prevent adverse consequences to the complainant and respondent in discrimination and harassment cases.

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

Yes, they form part in certain business agreements and contracts wherever relevant.

10. Assessments of the year

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

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

Leadership Indicators

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

There has been no case of human rights grievances/complaints. Hence, there were no modification/introduction to the business process.

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

No specific human rights due diligence has been conducted during the 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?

We are committed to ensuring full compliance with the Persons with Disabilities Act, 2016 as we actively enhance our premises to provide optimal accessibility for all visitors, including differently abled.

4. Details on assessment of value chain partners:

% of your value chain partners (by value of business done with such partners) that were assessed (by entity or statutory authorities or third parties)	
Sexual harassment	
Discrimination at workplace	
Child labour	No specific assessment to this effect has been carried out by the Company
Forced/involuntary labour	
Wages	
Others – please specify	

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

No corrective actions were required to be taken by the Company for the year under review.

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

Essential Indicators

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

Parameter	FY 2024		FY 2023	
	kWh	Tj	kWh	Tj
From renewable sources				
Total electricity consumption (A)	-	-		
Total fuel consumption (B)	-	-		
Energy consumption through other sources (C)	-	-		
Total energy consumed from renewable sources (A+B+C)	-	-		
From non-renewable sources				
Total electricity consumption (D)	10,41,465	3.75		
Total fuel consumption (E)	--	--		
Energy consumption through other sources (F)	--	--		
Total energy consumed from non-renewable sources (D+E+F)	10,41,465	3.75		
Total energy consumed (A+B+C+D+E+F)	10,41,465	3.75		Not Tracked
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	762.88 kWh/ Rupees crores of turnover	0.003 Tj/ Rupees crores of turnover		
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	--	--		
Energy intensity in terms of physical output	--	--		
Energy intensity (optional) – the relevant metric may be selected by the entity	356.91 kWh/ employee	0.001 Tj/ employee		

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

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

Not applicable.

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

Usage of water in the Company is restricted to human consumption only. We educate our employees about the ways to conserve water and also perform routine checks to identify leakage in pipes, joints or valves. Moreover, posters related to save water are pasted in the prominent places in the office in order to promote water saving activities.

Parameter	FY 2024	FY 2023
Water withdrawal by source (in kilo litres)		
(i) Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilo litres) (i + ii + iii + iv + v)	-	-
Total volume of water consumption (in kilo litres)	-	-
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	-	-
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	-	-
Water intensity in terms of physical output	-	-
Water intensity (optional) - the relevant metric may be selected by the entity	-	-

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency : No

4. Provide the following details related to water discharged: Not applicable

Parameter	FY 2024	FY 2023
Water discharge by destination and level of treatment (in kilo litres)		
(i) To Surface water	-	-
- No treatment	-	-
- With treatment - please specify level of treatment	-	-
(ii) To Groundwater	-	-
- No treatment	-	-
- With treatment - please specify level of treatment	-	-
(iii) To Seawater	-	-
- No treatment	-	-
- With treatment - please specify level of treatment	-	-
(iv) Sent to third-parties	-	-
- No treatment	-	-
- With treatment - please specify level of treatment	-	-
(v) Others	-	-
- No treatment	-	-
- With treatment - please specify level of treatment	-	-
Total water discharged (in kilo litres)	-	-

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency : No

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

Not applicable

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

Parameter	Please specify unit	FY 2024	FY 2023
NOx	-	-	-
SOx	-	-	-
Particulate matter (PM)	-	-	-
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others – please specify	-	-	-

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: No

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

Parameter	Unit	FY2024	FY2023
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	-	-
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	-	-
Total Scope 1 and Scope 2 emissions per rupee of Turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	-	-	-
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	-	-	-
Total Scope 1 and Scope 2 emission intensity in terms of physical output	-	-	-
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: No

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

No

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

Parameter	FY 2024	FY 2023
Total Waste generated (in metric tonnes)		
Plastic waste (A)	-	-
E-waste (B)	-	-
Bio-medical waste (C)	-	-
Construction and demolition waste (D)	-	-
Battery waste (E)	-	-
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G)	-	-
Other Non-hazardous waste generated. Please specify, if any (H) (Break-up by composition i.e. by materials relevant to the sector)	-	-
Total (A+B + C + D + E + F + G + H)	-	-
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	-	-
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	-	-
Waste intensity in terms of physical output	-	-
Waste intensity (optional) – the relevant metric may be selected by the entity	-	-
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	-	-
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
Total	-	-
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	-	-
(ii) Landfilling	-	-
(iii) Other disposal operations	-	-
Total	-	-

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: No

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

Since the Company is a housing finance company, the key waste products are primarily paper and e-waste. During the fiscal year 2023-24, your Company responsibly managed to dispose 137 kilograms of IT electronic waste (e-waste) to the vendor registered with Maharashtra Pollution Control Board and has also obtained the certification for the same.

Furthermore, the employees are also trained to segregate recyclable and non-recyclable waste with an aim to reduce non-recyclable waste. The Company does not use any hazardous and toxic chemicals.

11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:
Not applicable

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
-	-	-	-

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year: Not applicable

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
-	-	-	-	-	-

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

The Company is in compliance with environmental norms to the extent applicable.

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

Leadership Indicators

1. Water withdrawal, consumption and discharge in areas of water stress (in kilo litres): Not applicable

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

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

Parameter	FY 2024	FY 2023
Water withdrawal by source (in kilo litres)		
(i) Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilo litres)	-	-
Total volume of water consumption (in kilo litres)	-	-
Water intensity per rupee of turnover (Water consumed / turnover)	-	-
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

Parameter	FY 2024	FY 2023
Water discharge by destination and level of treatment (in kilo litres)		
(i) Into Surface water	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(ii) Into Groundwater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iii) Into Seawater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iv) Sent to third-parties	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(v) Others	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
Total water discharged (in kilo litres)	-	-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

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

Parameter	Unit	FY 2024	FY 2023
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	-	-
Total Scope 3 emissions per rupee of turnover	-	-	-
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not Applicable

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

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Fortification of the loan origination and management system	The revamped LOS allows for quick and efficient processing of loan applications, which have been made digital. The advanced LMS maintains a centralized database facilitating seamless access to loan information on real time basis.	Implementation of advanced loan origination and management systems has optimized resource utilization and enhanced customer service leading to eco-friendly operations.
2.	Automated HR operations	Automation of employee attendance, leave management, communications and e-documentation has streamlined internal processes and improved operational efficiency	Quick reports, Accurate data, continuous monitoring tool, reduction in time and energy of HR personnel.
3.	Paperless customer onboarding process	An application through which customers can be onboarded digitally without involvement of paperwork and strenuous physical process.	Saves time, reduces use of paper and increases efficiency.
4.	Digital loan application form	Physical loan application forms in paper form has now been made digital form to reduce paper usage in operations	Digital loan applications forms which used to be physical now will result in speeding up process, enhancing accuracy, improving access, boosting efficiency, increased convenience and less paper.
5.	Digital loan agreement	Paper agreements have now been converted to digital agreements with digital signature utilities as a measure of eradicating paper usage in operations.	Streamlining documentation, speeding up approvals, enhanced security and reduction in errors.
6.	Aptus E-seva application	Application used by the customer to download sanction letters, make payments, view latest transactions, etc without strains of physical interaction/paper usage	Save time, 24*7 access, instant information and seamless communication.

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

Yes, the Company has a Board-approved business continuity and disaster management plan. The policy encompasses comprehensive measures, including risk assessment, business impact analysis, recovery planning, and training and awareness programs.

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

Since the Company's nature of business is to provide housing loans, there has been no adverse impact on environment.

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

Nil

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.

Your Company has membership with one trade and industry chamber/association.

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

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Finance Industry Development Council (FIDC)	National

Note: The above-mentioned membership in FIDC is in the name of Aptus Finance India Private Limited, which is a wholly owned subsidiary of the Company.

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.

Name of the authority	Brief of the case	Corrective Action Taken
Nil	Nil	Nil

Leadership Indicators

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

The Company does not take part in any lobbying and has not propagated any public policy positions.

S. No.	Public Policy Advocated	Method Resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/Quarterly / Others –please specify)	Web Link if available
-	-	-	-	-	-

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

Name and brief details of project	SIA notification number	Date of Notification	Whether conducted by independent external agency Yes/No	Results communicated in Public domain	Relevant weblinks
-	-	-	-	-	-

2. Information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by the entity: Not Applicable

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
-	-	-	-	-	-	-

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

The Company has a dedicated customer care department that handles customer queries and complaints via telephone and email. Customers can also reach out through the “Aptus E-Seva” mobile application and WhatsApp. The grievance redressal policy for addressing customer complaints is available on the Company’s website. (weblink: [Grievance Redressal Policy](#))

Furthermore, the Board of Directors has adopted a Whistleblower Policy. This policy establishes a mechanism for all stakeholders, including Directors, employees, vendors, and suppliers, to report concerns about unethical behavior,

fraud, or violations of the Code of Conduct and Ethics. The policy provides safeguards against victimization of employees who use the mechanism and allows direct access to the Chairperson of the audit committee in exceptional cases. The Audit Committee periodically reviews the functioning of the whistleblower mechanism.

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers: Not applicable

	FY 2024	FY 2023
Directly sourced from MSMEs/ small producers	-	-
Directly from within India	-	-

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

Location	FY 2024	FY 2023
Rural	-	-
Semi-urban	57.51%	58.95%
Urban	12.00%	9.79%
Metropolitan	30.49%	31.26%

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

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

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

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

S.No.	State	Aspirational District	Amount Spent (INR)
-	-	-	-

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

(b) From which marginalized /vulnerable groups do you procure? Not applicable

(c) What percentage of total procurement (by value) does it constitute? Not applicable

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge: Not applicable

SL No	Intellectual Property based on traditional Knowledge	Owned/Acquired	Benefit Shared	Basis of Calculating Benefit Share
-	-	-	-	-

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

Name of Authority	Brief of the case	Corrective action taken
-	-	-

6. Details of Beneficiaries of CSR Projects

SL No.	CSR Project	No of Persons Benefited from CSR Projects	% of beneficiaries from vulnerable and marginalized group
1.	Education	3,780	100
2.	Healthcare	68,550	100
3.	Social/skill development	318	100

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.

Aptus is committed to fostering long-term relationships with its customers by providing them with convenient and reliable housing finance solutions. The Company's motive is to empower individuals and families to fulfill their dreams of owning a home. Aptus strives to be a trusted partner in its customers' journey towards homeownership, offering them personalized services and support every step of the way. The Company consistently seeks and incorporates customer feedback to enhance its systems and processes. This commitment has been reflected in consistently positive results from customer satisfaction surveys over the years.

The Company has put in place an effective Grievance Redressal Policy for effective redressal of customer complaints. The policy is available on the website of the Company (Weblink: [Grievance and Redressal Policy](#))

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	All our loan products and Most Important Terms and Conditions (MITCs) are completely transparent and discloses all product related details
Safe and responsible usage	
Recycling and/or safe disposal	

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

	FY 2024		Remarks	FY 2023		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy						
Advertising						
Cyber-security						
Delivery of essential services		Nil	-	Nil		-
Restrictive Trade Practices						
Unfair Trade Practices						
Other						

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

Not applicable

	Number	Reasons for recall
Voluntary recalls	-	-
Forced recalls	-	-

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 framework and policy on cyber security and risks related to data privacy. The IT strategy committee of the Company oversees the policy on cyber security and risks related to data privacy. Your Company is ISO/IEC 27001:2013 certified for Information Security Management System.

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.

No penalty/action taken by regulatory authorities on safety of products/services.

7. Provide the following information relating to data breaches:

- Number of instances of data breaches: Nil
- Percentage of data breaches involving personally identifiable information of customers: Nil
- Impact, if any, of the data breaches: Nil

Leadership indicators

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

All the information related to products and services offered by the Company are available on the website of the Company. (Weblink: [Information on products and services](#))

We also use various social media and digital platforms to disseminate information on the products and services that we offer.

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

The schedule of charges, most important terms and conditions and fair practices code are available at all the branches as well as on the Company's website for easy access of the customers.

We have also created video tutorials to help customers to track their loan application status and also payments through UPI.

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

In the event of any disruption/discontinuation of essential services, we approach the customer directly or through digital mode to ensure continued service.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

The Company displays the information related to its products/services at the branches and also on its website.

Further, the Company has carried out the survey about the customer review videos relating to the loans sanctioned.

Tamil:

<https://youtu.be/35vsxNopsQY?si=lc2PZb6Jf5Z99NTd>

https://youtu.be/TvHOcCGNe6w?si=xSY9mhOyZbMR_kgc

Kannada:

https://youtu.be/WbbS1_xj3xY?si=KeW3G_ysnVMfsdfZ

<https://youtu.be/ID45RnDgMIM?si=HLsZpvGbdgu3ufsm>

Telugu:

https://youtu.be/9TLvDe_dNGw?si=izpwHROOP4iqF9rU

<https://youtu.be/1cyyRGXOqhg?si=RcTKmSwif6QLKj6d>