

# Sunteck Realty Ltd.



SRL/SE/40/25-26

Date: 7<sup>th</sup> September, 2025

**National Stock Exchange of India Ltd**

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

**Symbol: SUNTECK**

**BSE Limited**

Phiroze Jeejeebhoy Tower,  
Dalal Street,  
Mumbai - 400 001

**Scrip Code: 512179**

**Sub: Business Responsibility and Sustainability Report for the Financial Year 2024-25**

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Business Responsibility and Sustainability Report ('BRSR') for the Financial Year 2024-25.

This is for your information and records.

Yours sincerely,

**For Sunteck Realty Limited**

**Rachana Hingarajia**

**Company Secretary**

**(ACS: 23202)**

**Encl: a/a**

## "Annexure - III"

### Business Responsibility & Sustainability Reporting (BRSR)

#### SECTION A: GENERAL DISCLOSURES

##### I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity	L32100MH1981PLC025346
2. Name of the Listed Entity	Sunteck Realty Ltd
3. Year of incorporation	01-10-1981
4. Registered office address	5th Floor, Sunteck Centre, 37-40, Subhash Road, Vile Parle (East), Mumbai 400057
5. Corporate address	5th Floor, Sunteck Centre, 37-40, Subhash Road, Vile Parle (East), Mumbai 400057
6. E-mail	cosec@sunteckindia.com
7. Telephone	022-42877800
8. Website	https://www.sunteckindia.com/
9. Financial year for which reporting is being done	2024-25
10. Name of the Stock Exchange(s) where shares are listed	Bombay Stock Exchange of India Limited & National Stock Exchange of India Limited
11. Paid-up Capital	INR 146,489,084
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Rachana Hingaraja 022-42877800 cosec@sunteckindia.com
13. Reporting boundary  <i>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).</i>	Disclosures are made on a consolidated basis for Sunteck Realty Limited and its subsidiaries.
Name of assurance provider	British Standards Institution (BSI)
Type of assurance obtained	Limited Assurance

##### II. Products/services

#### 14. 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 (FY25)
1	<b>Real Estate development and leasing</b>	Development of Residential and Commercial Projects	100%

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

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

##### III. Operations

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

Location	Number of plants	Number of offices	Total
<b>National</b>	0	5	5
<b>International</b>	0	2	2

“Annexure - III” (Contd.)

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

**a. Number of locations**

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

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

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

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

Sunteck Realty Limited serves diverse customer segments under residential and commercial properties, the residential segment includes affordable homes, luxury residences, high-return properties while the commercial segment includes office spaces, retail hubs, and mixed use developments.

**IV. Employees**

**18. Details as at the end of Financial Year:**

**a. Employees and workers (including differently abled):**

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>EMPLOYEES</b>						
1.	Permanent (D)	628	450	71.66%	178	28.34%
2.	Other than Permanent (E)	0	0	0	0	0
3.	<b>Total employees (D + E)</b>	<b>628</b>	<b>450</b>	<b>71.66%</b>	<b>178</b>	<b>28.34%</b>
<b>WORKERS</b>						
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	0	0	0	0	0
6.	<b>Total workers (F + G)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

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

**b. Differently abled Employees and workers**

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

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

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

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	6	2	33.33%
Key Management Personnel	1	0	0%

"Annexure - III" (Contd.)

## 20. Turnover rate for permanent employees and workers

	FY 2024-25			FY 2023-24			FY 2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	26.11%	10.19%	37.53%	30.7%	10.92%	40.26%	30.64%	10.55%	41.2%
Permanent Workers	0	0	0	0	0	0	0	0	0

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

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

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

“Annexure - III” (Contd.)

**VI. CSR Details**

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

**(ii) Turnover (in ₹) - ₹ 8,53,13,39,813.81/-**

**(iii) Net worth (in ₹) - ₹ 23,98,12,51,242.13/-**

**VII. Transparency and Disclosures Compliances**

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)	FY 2024-25			FY 2023-24			
		(If Yes, then provide web-link for grievance redress policy) *	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes		0	0	Nil	0	0	Nil
Investors (other than shareholders)	Yes		0	0	Nil	0	0	Nil
Shareholders	Yes		0	0	Nil	0	0	Nil
Employees and workers	Yes		0	0	Nil	0	0	Nil
Customers	Yes		654	37	We have 6 cases registered with RERA. The complaints registered are related to maintenance, possession delays, parking issues.	434	25	We have 5 cases registered with RERA. The other issues mainly involve disputes over maintenance charges, which will be addressed during the formation of the society. Additionally, there are complaints related to leakage and seepage that are currently being resolved.
Value Chain Partners	Yes		0	0	Nil	0	0	Nil
Other (please specify)	Yes		0	0	Nil	0	0	Nil

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

"Annexure - III" (Contd.)

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Water Conservation	Opportunity	Water plays a crucial role in both construction and building maintenance. Efficient water conservation practices are essential to ensure sustainable operations, reduce operational costs, and maintain continuity in water-scarce regions. These efforts also support progress toward the Sustainable Development Goals (SDGs) and align with stakeholder expectations for responsible resource management.	-	Positive
2	Occupational Health & Safety	Opportunity	As a real estate company, Sunteck Realty is exposed to various occupational health and safety risks arising from its operational activities. The Company places high priority on protecting the health and safety of employees and contractors across all project sites. By focusing on proactive safety measures and compliance with standards, Sunteck aims to minimize workplace accidents and injuries, thereby reducing associated financial and reputational risks and fostering a safe and secure working environment.	-	Positive financial implications: companies can benefit from increased productivity, reduced man lost days, reduced absenteeism and turnover, and improved reputation.

“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	Green Buildings	Risk & Opportunity	<p>Green building certification offers both risks and opportunities.</p> <p>Risk: Achieving green building certification involves complying with defined guidelines, technical standards, and documentation protocols. This process can be challenging and resource-intensive. The complexity of aligning project specifications with certification criteria often requires additional time and expertise, underscoring the importance of capacity-building and training to support successful implementation.</p> <p>Opportunity: Green buildings offer significant long-term benefits by reducing energy consumption, optimizing water usage, and lowering maintenance costs, resulting in substantial savings that offset initial investments over time. In addition to financial advantages, these buildings prioritize occupant health and well-being through features such as enhanced indoor air quality, abundant natural lighting, and access to green spaces. Collectively, these elements contribute to improved productivity, greater occupant satisfaction, and a higher overall quality of life.</p>	<p>The Company's head office is LEED certified (achieved Gold Certification).</p> <p>Four of the current projects are EDGE pre-certified while the EDGE pre-certification is in-progress for two of its ongoing projects.</p>	Positive and Negative

## "Annexure - III" (Contd.)

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4	Carbon Footprint	Risk	Monitoring and managing carbon emissions is crucial for regulatory compliance, operational efficiency, and stakeholder alignment. By reducing its carbon footprint, the Company ensures adherence to environmental standards, lowers energy-related expenses, and demonstrates its commitment to sustainable development and climate responsibility.	Conduct product carbon footprint analysis, implement energy-efficient systems, invest in renewable energy sources, and conduct regular carbon audits to track and reduce emissions.	Negative
5	Human Rights	Risk	Upholding human rights is fundamental to safeguarding the well-being of our workers and employees. It promotes fair treatment, ensures safe working environments, and reinforces compliance with labor standards	Conducted human rights assessment to identify and address potential human rights impacts within operations.  Based on the assessment integrate appropriate mitigation measures.	Negative
6	Employee wellbeing and development	Risk and Opportunity	Real estate companies often experience high employee turnover, making employee well-being and development critical metrics for our organization. Striking the right balance in prioritizing these key performance indicators is essential to fostering a stable, motivated, and high-performing workforce	Providing resources and support systems—such as stress management workshops, wellness programs, and Employee Assistance Programs—is essential to help employees effectively manage stress and maintain their overall well-being	Positive and Negative
7	Sustainable Supply Chain	Risk and Opportunity	Assessing supply chain sustainability is vital to ensure responsible sourcing, verify that materials meet environmental and social standards, and minimize risks related to disruptions. It also enables to monitor and track Scope 3 emissions associated with our supply chain activities.	Based on the supply chain assessment conducted, indentify and mitigate potential risks, conduct capacity building workshops for suppliers and align on environmental goals with them to track and reduce scope 3 emissions.	Positive and Negative

“Annexure - III” (Contd.)

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
8	Data privacy & security	Opportunity	Managing data privacy and security is essential for safeguarding sensitive business and customer information. It ensures regulatory compliance and fosters client trust—both of which are critical to sustainable business growth. We are dedicated to continuously invest in advanced technologies to strengthen our cybersecurity framework, prevent data breaches, and enhance customer confidence.	-	Positive
9	Business Ethics & Corporate Governance	Opportunity	Having a strong corporate governance is not only a compliance requirement but key to effective risk management in the real estate sector. It enables the Company to prevent reputational damage, avoid regulatory penalties, and mitigate legal risks through responsible and transparent business practices.	-	Positive
10	Climate Change	Risk	Given the emission-intensive nature of the sector, failing to address emissions poses significant risks for our company. These include potential reputational damage, regulatory penalties, and increased operational costs. Proactively managing emissions is therefore essential to maintaining compliance, reducing risk, and strengthening our long-term sustainability	Strategies to address climate change 1. Transition to Clean Energy Sources 2. Improve Energy Efficiency	Negative

## "Annexure - III" (Contd.)

<b>S. No.</b>	<b>Material issue identified</b>	<b>Indicate whether risk or opportunity (R/O)</b>	<b>Rationale for identifying the risk / opportunity</b>	<b>In case of risk, approach to adapt or mitigate</b>	<b>Financial implications of the risk or opportunity (Indicate positive or negative implications)</b>
11	Waste Management	Opportunity	Sunteck places a strong emphasis on effective waste management, recognizing its role in minimizing environmental impact, ensuring regulatory compliance, reducing operational costs, and enhancing our corporate reputation.	-	Positive
12	Occupants Satisfaction	Opportunity	Occupant satisfaction is critical to the Company's success, as customers are most valuable asset. Maintaining high levels of satisfaction helps protect our reputation, drive revenue growth, and ensure long-term business success.	-	Positive
13	Sustainable Sourcing	Opportunity	Sunteck depends on a range of raw materials for construction and maintenance, such as steel, cement, lumber, and plastic. To ensure responsible sourcing, the Company engages with suppliers to understand their sourcing practices, evaluate associated environmental and social risks, and encourage diversification within their supply chains	-	Positive
14	Diversity, Equity & Inclusion	Opportunity	The Company is determined to foster a diverse and inclusive workplace, recognizing that it enables to better serve the diverse customer base. The Company views diversity, equity, and inclusion (DEI) as a strategic priority that drives benefits such as enhanced collaboration, stronger brand reputation, and overall business growth.	The company strives to facilitate flexible working arrangements for its employees which will include appropriate work from home opportunities and all weekend holidays among others	Positive

"Annexure - III" (Contd.)

### 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.**

<b>S. No.</b>	<b>Principle Description</b>	<b>Reference of the Policies</b>
<b>P1</b>	Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.	<ul style="list-style-type: none"> <li>• Code of Conduct Policy,</li> <li>• Anti-Bribery and Anti-Corruption Policy,</li> <li>• Whistleblower Policy,</li> <li>• Related Party Transactions Policy</li> <li>• Nomination and Remuneration Policy</li> <li>• Fair disclosure code</li> <li>• Policy for determination of materiality</li> <li>• Board diversity Policy</li> <li>• Tax Policy</li> </ul>
<b>P2</b>	Businesses should provide goods and services in a manner that is sustainable and safe	<ul style="list-style-type: none"> <li>• Environmental Policy</li> <li>• Supplier code of conduct Policy</li> <li>• Environment Management Manual</li> </ul>
<b>P3</b>	Businesses should respect and promote the well-being of all employees, including those in their value chains	<ul style="list-style-type: none"> <li>• Human Rights Policy</li> <li>• Whistleblower Policy,</li> <li>• Freedom of Association and Collective Bargaining Policy</li> </ul>
<b>P4</b>	Businesses should respect the interests of and be responsive to all its stakeholders	<ul style="list-style-type: none"> <li>• Corporate Social Responsibility Policy</li> <li>• Stakeholder Engagement Policy</li> <li>• Grievance Redressal Policy</li> </ul>
<b>P5</b>	Businesses should respect and promote human rights	<ul style="list-style-type: none"> <li>• Code of Conduct Policy</li> <li>• Human Rights Policy</li> <li>• Whistleblower Policy</li> </ul>
<b>P6</b>	Businesses should respect and make efforts to protect and restore the environment	<ul style="list-style-type: none"> <li>• Whistleblower Policy</li> <li>• ESG policy</li> </ul>
<b>P7</b>	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"> <li>• Anti-Bribery and Anti-Corruption Policy</li> <li>• Policy on determining materiality.</li> <li>• Dividend Distribution Policy</li> <li>• Policy for Archiving, Preservation and Disposal of documents</li> </ul>
<b>P8</b>	Businesses should promote inclusive growth and equitable development	<ul style="list-style-type: none"> <li>• Corporate Social Responsibility Policy</li> </ul>
<b>P9</b>	Businesses should engage with and provide value to their consumers in a responsible manner	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Stakeholder Engagement Policy</li> <li>• Cyber Security Policy</li> </ul>

## "Annexure - III" (Contd.)

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>									
<b>1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y
<b>b. Has the policy been approved by the Board? (Yes/No)</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y
<b>c. Web Link of the Policies, if available</b>	<a href="https://www.sunteckindia.com/investor-relations#codepolicies">https://www.sunteckindia.com/investor-relations#codepolicies</a>								
<b>2. Whether the entity has translated the policy into procedures. (Yes / No)</b>	Yes								
<b>3. Do the enlisted policies extend to your value chain partners? (Yes/No)</b>	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.								
<b>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.</b>									
Principle 1	1. LEED								
Principle 2	2. EDGE - IFC								
Principle 3	3. GRESB								
Principle 4	4. ISO 9001:2015								
Principle 5	5. ISO 14001:2015								
Principle 6	6. ISO 45001:2018								
Principle 7									
Principle 8									
Principle 9									
<b>5. Specific commitments, goals and targets set by the entity with defined timelines, if any.</b>	<p>Sunteck endeavors to achieve following goals in order to strengthen its ESG journey:</p> <ul style="list-style-type: none"> <li>- &gt;95% Green building certifications for its residential and commercial projects</li> <li>- Conducting Supply chain assessment in the subsequent year</li> <li>- Conducting Human rights due diligence in the subsequent year</li> <li>- Conducting Climate risk assessment for select sites.</li> <li>- Undertaking Scope 1 &amp; Scope 2 reduction targets</li> </ul>								
<b>6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.</b>	None								

“Annexure - III” (Contd.)

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
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**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,

At Sunteck Realty Limited, we believe that ‘purpose’ fuels ‘progress’. Guided by our core purpose to *Building for a Better Tomorrow*, we strive to create long-term, meaningful positive impacts across the communities we serve and the environment we inhabit.

At the heart of this purpose lies our dedication to eco-conscious living – a philosophy that seamlessly integrates urban development with environmental stewardship. Sustainability is not an ancillary effort; it is central to our strategic vision. As we shape the future of real estate, we remain focussed on ensuring that every project contributes not just to economic value, but also ecological and social well-being.

The Sixth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) highlights the current consequences of 1.1°C of global warming, emphasizing the continuous rise in global greenhouse gas emissions. The report cautions us that warming is likely to surpass 1.5°C during the 21st century, underscoring the urgency for immediate and collaborative action from governments, businesses, and civil society. In response, governments around the world are enacting legislation to hasten the transition to net-zero emissions. This includes India’s ambitious focus made at COP26 and the Green Deal Industrial Plan (GDIP) in the European Union, all signalling a rapid escalation in climate change initiatives.

However, the scale and urgency of the climate crisis demand more than intent; they require *deeper collaboration* – across industries, governments, and communities, across borders and sectors. Only through collective and coordinated action we can achieve lasting impact.

At Sunteck, sustainability is defining lens through which we view value creation. As we present our fourth Sustainability Report, I am proud to reflect on our continued efforts to integrating environmental, social, and governance (ESG) principles into every facet of our operations. Our efforts align closely with India’s national sustainability goals, which emphasize the importance of eco-friendly practices, resource efficiency, social inclusivity, and governance.

We have integrated these objectives into our operational strategies. In recognition of the critical importance of eco-conscious real estate, we have ensured that all our development projects achieve Green Building certification, supporting India’s goal of reducing carbon emissions. Our efforts to minimize our carbon footprint are evident through the adoption of renewable energy, utilization of recycled materials, water management initiatives, and structured waste recycling partnerships.

This year, to deepen our focus on climate resilience we also conducted climate risk assessment across our portfolio. The insights are now shaping out adaptive strategies – from resilient construction design to energy efficient operations – ensuring that developments remain sustainable in rapidly changing environment. Equally important is our dedication towards responsible business practices. As part of our Human Rights Assessment, we evaluated potential risks across our value chain, including labour conditions, community displacement, and health and safety standards.

Due to our remarkable strides in our sustainability initiatives, we have been recognized through a fabulous GRESB score of **96** and a score of **60** in the CSA DJSI.

Throughout our journey, Sunteck Realty has consistently upheld a strong focus on governance. Trust is the bedrock of our achievements, and we are dedicated to earning and preserving the trust of all our stakeholders. Our emphasis on governance, financial discipline, and effective communication has propelled us to excel one of the well-known face in Mumbai’s real estate market.

"Annexure - III" (Contd.)

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9									
<p>As we navigate the intersection of urban transformation and climate action, we intend not only to adapt, but to steer the change in meaningful ways. Our sustainability journey is accelerating through our endeavor to excel, powered by partnerships and propelled by purpose. The future we're building shines brighter because it's sustainable by design, inclusive by intention, and transformative by action. This is our pledge: To build with such purpose and passion that future generations will look back at this moment as the pivotal point - when sustainability stopped being an initiative and became a share legacy.</p> <p style="text-align: right;"><b>Warm regards,</b> <b>Kamal Khetan</b> <b>Chairman and Managing Director</b></p>																		
<b>8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy/policies</b>	The compliance team and the ESG (Environmental, Social, and Governance) committee jointly oversee the implementation of business responsibility policies, with strategic oversight and direction provided by the Chairman and Managing Director.																	
<b>9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.</b>	Sunteck has established an ESG (Environmental, Social, and Governance) Committee to guide and monitor key activities across the Company, ensuring the effective execution of its sustainability objectives. The Committee is responsible for formulating and evaluating ESG goals and policies, developing strategic investor communications, driving performance across key sustainability indicators, and conducting regular assessments. Critical concerns and insights are escalated to the Chairman and Managing Director, who serves as the principal decision-maker for sustainability-related performance.																	
<b>10. Details of Review of NGRBCs by the Company:</b>																		
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 the aforementioned policies, along with corresponding follow-up actions, is reviewed by relevant governing bodies including the Board of Directors, the Nomination and Remuneration Committee, the Audit Committee, and the Corporate Governance Committee, as applicable. These reviews are conducted annually or whenever deemed necessary, as necessitated by changes in applicable laws or regulations.									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.																	

“Annexure - III” (Contd.)

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9
An internal assessment was conducted through periodic reviews of existing policies to evaluate their implementation and effectiveness. The assessment focused on benchmarking the adequacy of these policies against best practices. For the financial year 2024-25, no external agency was engaged for assessment or evaluation.									

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

NA- Not applicable.

**SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE**

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is 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	%age of persons in respective category covered by the awareness programmes
<b>Board of Directors</b>	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%
<b>Key Managerial Personnel</b>	1		100%
<b>Employees other than BoD and KMPs</b>	4	1. ESG Training 2. Health & Safety Training 3. Human rights 4. POSH	100%
<b>Workers</b>	Not applicable		

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

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

For FY24-25, there were no instances of fines, penalties, compounding fees, settlements, imprisonment, or any other form of punishment.

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**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 is determined to uphold the highest standards of corporate governance and ethical business conduct. Dedicated efforts are made to ensure full compliance with all disclosure requirements. In alignment, an Anti-Bribery and Anti-Corruption Policy—modeled on the principles of the International Finance Corporation (IFC)—has been instituted to promote value creation for all stakeholders through fairness, transparency, integrity, and accountability.

This Policy establishes a robust framework for adherence to applicable anti-bribery and anti-corruption standards. It is binding on the Company, its subsidiaries, associates, and any entities under its management control. Additional details are available on <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.**

	FY 2024-25	FY 2023-24
<b>Directors</b>	0	0
<b>KMPs</b>	0	0
<b>Employees</b>	0	0
<b>Workers</b>	0	0

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

	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
<b>Number of complaints received in relation to issues of Conflict of Interest of the Directors</b>	0	Nil	0	Nil
<b>Number of complaints received in relation to issues of Conflict of Interest of the KMPs</b>	0	Nil	0	Nil

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

Not applicable.

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

	FY 2024-25	FY 2023-24
<b>Number of days of accounts payables</b>	175.91	261.401*

\*The values for FY 2023-24 have been revised and updated.

**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 2024-25	FY 2023-24
<b>Concentration of Purchases</b>	a. Purchases from trading houses as % of total purchases	0.47%	Nil
	b. Number of trading houses where purchases are made from	341	Nil

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Parameter	Metrics	FY 2024-25	FY 2023-24
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	6.70%	Nil
<b>Concentration of Sales</b>	a. Sales to dealers / distributors as % of total sales	0	0
	b. Number of dealers / distributors to whom sales are made	0	0
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	0	0
<b>Related party transactions</b>	a. Purchases (Purchases with related parties / Total Purchases)	0	0
	b. Sales (Sales to related parties / Total Sales)	0	0
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)*	21.64%	27.49%
	d. Investments (Investments in related parties / Total Investments made)*	99.61%	99.45%

\*The values of investments made under related party transactions have been revised and updated for FY2023-24

**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 conducted an ESG training session for its value chain partners to emphasize the importance of embedding Environmental, Social, and Governance (ESG) practices into business operations. The session served as an educational platform to share best practices aligned with the Company’s ESG objectives, covering key environmental topics such as energy efficiency, waste management, carbon footprint reduction, and sustainable sourcing.</p> <p>Participants were also introduced to sustainable construction techniques, green building certifications, and renewable energy adoption, with the aim of fostering responsible practices across the supply chain. The training incorporated all nine principles of the National Guidelines on Responsible Business Conduct (NGRBC), reinforcing the expectation that partners adhere to the Company’s Code of Conduct, Human Rights Policy, Anti-Bribery and Anti-Corruption Policy, and Supplier Code of Conduct throughout their engagement.</p>	10%

**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 instituted a comprehensive Code of Conduct applicable to the Board of Directors and all employees, encompassing principles of ethics, integrity, and honesty. This Code outlines clear guidelines and

## "Annexure - III" (Contd.)

procedures for addressing unethical behavior and reinforces mechanisms for managing conflicts of interest, particularly those involving board members, thereby fostering a culture of transparency and accountability.

Board members proactively uphold these standards by annually disclosing their affiliations and investments to ensure the absence of any conflicts with their roles in the Company. In accordance with governance protocols, all Directors and Key Managerial Personnel (KMPs) are mandated to report any potential or actual conflicts of interest 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.**

	FY 2024-25	FY 2023-24	Details of improvements in environmental and social impacts
<b>R&amp;D</b>	0%	0%	Nil
<b>Capex</b>	3.6%	1%	The Company has installed Organic Waste Collector and Solar Photovoltaic Power Plant System at their project sites.

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

The Company actively engages and educates its suppliers to adopt sustainability initiatives and encourages transparent disclosure of their ESG performance. Through continuous tracking and monitoring, Sunteck implements targeted initiatives to enhance sustainability across its supply chain.

A comprehensive Supplier Code of Conduct and Materials Policy outlines ESG expectations for all suppliers. These standards are embedded into contractual agreements with major suppliers and contractors. The Company prioritizes local sourcing within defined project boundaries to reduce emissions and energy consumption associated with transportation and storage. This approach also supports local economic development by creating business and employment opportunities for nearby vendors and suppliers.

In FY 2024-25, 100% of inputs were sourced from suppliers adhering to Sunteck's Supplier Code of Conduct. Additionally, over 90% of materials for the development portfolio were locally procured. Our most procured materials (by value) have recycled content in the formation of final product such as cement with ggbs, structured steel etc. To further reinforce responsible sourcing, the Company aims to conduct a sustainable supply chain assessment in the upcoming year, demonstrating its commitment to environmental stewardship and social responsibility.

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

As a service-based real estate entity, Sunteck Realty Limited does not reclaim products for reuse, recycling, or disposal at the end of life. The Company develops residential and commercial properties for sale and does not retain ownership or operational control once the units are sold. Consequently, Sunteck has no authority over post-sale usage or end-of-life processes related to plastics (including packaging), e-waste, hazardous waste, or other waste generated by the occupants.

- 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.

“Annexure - III” (Contd.)

**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 procured products in FY 2024-25.

**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	
	FY 2024-25	FY 2023-24
AAC Blocks	8%	6.15%*
Cement PPC		
RMC		
Steel TMT		
Structural Steel		

\*Note: The percentage of recycled or re-used input material for FY 2023-24 have been revised and updated.

**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.**

Not applicable.

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

**Essential Indicators**

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent employees</b>											
Male	450	450	100%	450	100%	0	0%	450	100%	0	0%
Female	178	178	100%	178	100%	178	100%	0	0%	0	0%
<b>Total</b>	<b>628</b>	<b>628</b>	<b>100%</b>	<b>628</b>	<b>100%</b>	<b>178</b>	<b>28.34%</b>	<b>450</b>	<b>71.65%</b>	<b>0</b>	<b>0%</b>
<b>Other than Permanent employees</b>											
<b>Male</b>	0	0	0	0	0	0	0	0	0	0	0
<b>Female</b>	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

“Annexure - III” (Contd.)

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

Note: As per the BRSR Guidance Note, Sunteck Realty Limited does not have workers within the definition prescribed. In alignment with its standard business practices, the Company does not directly employ or hire workers for construction or related project activities. All workforce-related obligations are managed by the identified contractors engaged by the Company, who are responsible for compliance with applicable labor standards and workforce management.

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

	FY 2024-25	FY 2023-24
<b>Cost incurred on well- being measures as a % of total revenue of the company</b>	0.10%	0%

**2. Details of retirement benefits.**

Benefits	FY 2024-25			FY 2023-24		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority. (Y/N/N.A.)	No. of employees covered as a % of total employee	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
<b>PF</b>	82.32%	0	Yes	84.84%	0	Yes
<b>Gratuity</b>	100%	0	Nil	100%	0	Nil
<b>ESI</b>	0	0	Nil	0	0	Nil
<b>Others - please specify</b>	0	0	Nil	0	0	Nil

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

**3. Accessibility of workplaces**

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

The Company does not have any differently abled employees and workers. However, measures are in place to ensure accessibility across its premises, with ongoing efforts to further enhance inclusion.

**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 is a core principle embedded in Sunteck Realty Limited’s Human Rights Policy. The Company is dedicated to fostering a workplace culture that upholds non-discrimination and ensures fair treatment across all employment processes, including recruitment, hiring, termination, and promotion. Employment decisions are based solely on individual merit, without bias toward race, color, religion, creed, caste, economic or social status, gender, nationality, citizenship, age, sexual orientation, physical disability, childbirth, marital status, medical condition, language, or any other protected characteristic under applicable law. Sunteck maintains a zero-tolerance stance against all forms of discrimination—whether direct or indirect—and actively promotes inclusivity and equal access to opportunities.

Further details within human rights policy can be found at: <https://www.sunteckindia.com/investor-relations>

“Annexure - III” (Contd.)

**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	22%	22%	-	-
Female	100%	100%	-	-
<b>Total</b>	<b>46.15%</b>	<b>46.15%</b>	-	-

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

**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.**

	<i>(If Yes, then give details of the mechanism in brief)</i>
<b>Permanent Workers</b>	Not applicable
<b>Other than Permanent Workers</b>	Not applicable
<b>Permanent Employees</b>	Sunteck Realty Limited has instituted a formal Grievance Policy that serves as the foundation of a transparent, equitable, and accessible redressal mechanism for all employees. The Policy outlines a clear and structured process for raising grievances, including identification of the appropriate personnel responsible for resolution. Confidentiality and protection of the aggrieved employee’s identity are prioritized at every stage of the grievance handling process, ensuring a safe and respectful environment for all stakeholders.  Further details can be found at: <a href="https://www.sunteckindia.com/investor-relations#codepolicies">https://www.sunteckindia.com/investor-relations#codepolicies</a>
<b>Other than Permanent Employees</b>	Not applicable

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

Category	FY 2024-25			FY 2023-24		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
<b>Total Permanent Employees</b>	0	0	0	0	0	0
- Male	0	0	0	0	0	0
- Female	0	0	0	0	0	0
<b>Total Permanent Workers</b>	0	0	0	0	0	0
- Male	0	0	0	0	0	0
- Female	0	0	0	0	0	0

There are no employee associations recognized by the Company.

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## 8. Details of training given to employees and workers:

Category	FY 2024-25					FY 2023-24				
	Total (A)	On Health and safety measures		On Skill up gradation		Total (D)	On Health and safety measures		On Skill up gradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Male	450	450	100%	450	100%	421	421	100%	421	100%
Female	178	178	100%	178	100%	166	166	100%	166	100%
<b>Total</b>	<b>628</b>	<b>628</b>	<b>100%</b>	<b>628</b>	<b>100%</b>	<b>587</b>	<b>587</b>	<b>100%</b>	<b>587</b>	<b>100%</b>
<b>Workers</b>										
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

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

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
<b>Male</b>	450	230	51.11%	421	256	60.81%
<b>Female</b>	178	101	56.74%	166	100	60.24%
<b>Total</b>	<b>628</b>	<b>331</b>	<b>52.7%</b>	<b>587</b>	<b>356</b>	<b>60.65%</b>
<b>Workers</b>						
<b>Male</b>	0	0	0	0	0	0
<b>Female</b>	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Note: The Company does not have any workers as defined in the BRSR Guidance Note. Also, the 46.7% 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 the current financial year, 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, Sunteck Realty Limited is also compliant to ISO 45001:2018 (Occupational Health and Safety Assessment System), ISO 9001:2015 (Quality Management System), and ISO 14001:2015 (Environmental Management 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 Company has implemented a comprehensive Occupational Health and Safety Management System (OHSMS), which includes an OHS Manual and supporting processes designed to safeguard the well-being of employees and workers. Site teams undergo regular training on safety parameters and best practices, supported by initiatives such as induction programs, mock drills, firefighting training, safety week celebrations, and periodic health and medical check-ups.

To reinforce its safety culture, Sunteck has formalized a Health and Safety Policy applicable to all employees. This policy reflects management's endeavor to employee welfare and its recognition of the link between

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workplace safety and optimal business performance. It clearly defines the roles and responsibilities of both employers and employees, and outlines preventive measures covering work-related hazards, infection control, medical examinations, staff education, radiation safety, and healthcare 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 forms the cornerstone of all operational activities at Sunteck Realty Limited, encompassing key dimensions such as personnel safety, environmental protection, process integrity, chemical handling, transportation safety, and asset reliability. With a skilled workforce and responsible contractors, the Company implements proactive measures to eliminate hazards, mitigate risks, and prevent incidents.

To institutionalize this approach, Sunteck establishes a dedicated Hazard Identification and Risk Assessment (HIRA) team at each project site. These teams are tasked with developing comprehensive, site-specific plans for identifying hazards, assessing risks and opportunities, and implementing control measures. Routine inspections are conducted to monitor deviations in operations and evaluate safety across multiple domains, including facility safety, occupational health, chemical management, fire prevention, and equipment integrity.

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

Sunteck Realty Limited has implemented a robust Occupational Health and Safety (OHS) management process that encourages workers to proactively report any safety-related concerns or inconveniences to the site team and designated safety managers. Each project site is equipped with safety officers who maintain a formal incident reporting system, while safety managers ensure that all reported observations are addressed through appropriate corrective and preventive actions.

To further promote open communication, suggestion boxes have been installed at all sites, allowing workers to submit feedback, complaints, or suggestions in their local language. These inputs are reviewed weekly by the site safety team to ensure timely resolution and continuous improvement in workplace safety.

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

Sunteck Realty Limited recognizes that employee well-being extends beyond physical health, embracing a holistic work culture that prioritizes mental and emotional wellness. All employees have access to non-occupational medical and healthcare services through a range of initiatives, including stress management sessions, ergonomics workshops, health check-up camps, and women’s wellness programs. The Company also offers comprehensive parental and maternity leave benefits to both male and female employees, along with health insurance and coverage under the Group Accidental Policy (GAP).

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

Safety Incident/Number	Category	FY 2024-25	FY 2023-24
<b>Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)</b>	Employees	0	0
	Workers	0	0.34
<b>Total recordable work-related Injuries</b>	Employees	0	0
	Workers	0	2
<b>No. of fatalities</b>	Employees	0	0
	Workers	0	0
<b>High consequence work-related injury or ill-health (excluding fatalities)</b>	Employees	0	0
	Workers	0	1

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

Sunteck Realty Limited recognizes that the overall physical and mental well-being of its employees is fundamental to the Company's success and long-term growth. To support this, Sunteck ensures that employees across both corporate offices and development sites have access to comprehensive health and safety services.

Workspaces are thoughtfully designed to prioritize employee wellness, incorporating elements that promote thermal, visual, and ergonomic comfort. These design features help reduce stress and discomfort caused by excessive noise, poor lighting, glare, or thermal imbalance, thereby fostering a productive and health-conscious environment.

In addition, the Company is integrating biophilic design elements such as natural materials, greenery, and open spaces to strengthen employees' connection to nature and encourage social interaction, ultimately enhancing emotional well-being. A dedicated health and safety training program was also conducted at the Head Office and site locations to reinforce safe practices and promote a culture of care among all employees.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
<b>Working Conditions</b>	0	0	Nil	0	0	Nil
<b>Health &amp; Safety</b>	0	0	Nil	0	0	Nil

## 14. Assessments for the year

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

Sunteck Realty Limited's core ISO team conducts rigorous monthly safety and environmental audits across all active project sites, utilizing a comprehensive safety checklist to uphold high operational standards. A minimum internal benchmark has been established as the compliance threshold, and all sites have consistently met or exceeded this standard demonstrating the Company's unwavering commitment to safe working environments.

In alignment with its focus on safety and sustainable construction practices, Sunteck has replaced bamboo scaffolding from all ongoing projects, replacing it with advanced and secure alternatives. These upgraded scaffolding systems enhance site safety, reduce accident risks, and improve overall project efficiency.

Further reinforcing its safety-first approach, the Company has deployed paramedic staff at construction sites to provide immediate medical assistance and ensure rapid response to any health emergencies. These proactive measures reflect Sunteck's dedication to protecting its workforce and promoting a culture of care, responsibility, and sustainable development.

### Leadership Indicators

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

Sunteck Realty Limited does not currently offer specific provisions for employees and workers beyond its standard benefits framework. However, the Company has instituted a Group Accidental Policy to provide a protective financial shield for its employees against unforeseen incidents. This policy offers coverage for accidental death,

“Annexure - III” (Contd.)

permanent total disability, and partial disability, ensuring peace of mind and financial security in the event of an accident.

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

Sunteck Realty Limited ensures that all agreements and contracts formalized with its value chain partners clearly outline their responsibility for the deduction and deposit of statutory dues. Contractors are required to demonstrate ongoing compliance with statutory obligations by submitting valid registrations for Provident Fund (PF) and Employee State Insurance Corporation (ESIC), along with copies of workmen compensation policies, as mandated by applicable regulations.

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

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25	FY 2023-24	FY 2024-25	FY 2023-24
<b>Employees</b>	0	0	0	0
<b>Workers</b>	0	0	0	0

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

No, Sunteck Realty Limited does not currently offer transition assistance programs aimed at supporting continued employability or managing career transitions related to 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
<b>Health and safety practices</b>	<p>In FY 2024-25, Sunteck Realty Limited conducted a comprehensive supply chain assessment to evaluate its suppliers against key ESG parameters. The assessment utilized detailed checklists covering areas such as water and waste management, transportation practices, workplace safety, employee well-being, and climate resilience.</p> <p>The Company has articulated stringent standards for health, safety, and working conditions within its Code of Conduct, and actively encourages its value chain partners to uphold these principles. Through continuous engagement and oversight, Sunteck promotes responsible practices across its supply chain to ensure alignment with its broader sustainability objectives.</p>
<b>Working conditions</b>	

**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.**

No significant risks were observed pertaining to the value chain partners. Thus, no corrective action have been taken in the financial year 2024-25.

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

## "Annexure - III" (Contd.)

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

Sunteck has systematically identified and mapped both its internal and external stakeholders, assessing their relationships with individual business units. This approach enables the Company to thoroughly evaluate the risks and implications—whether direct or indirect—affecting each stakeholder group. Recognizing that every group holds distinct perspectives and expectations, Sunteck has classified stakeholders into six key categories critical to its operations.

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

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

“Annexure - III” (Contd.)

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

**Leadership Indicators**

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

The management maintains consistent engagement with key stakeholder groups through structured interaction channels. A range of mechanisms are employed to analyze, plan, and execute stakeholder-related initiatives, ensuring their interests are effectively integrated into organizational objectives. This stakeholder-centric approach forms the foundation for strategic development and decision-making. Additionally, designated departments within the Company act as intermediaries between stakeholders and the Board, facilitating the communication of any material concerns or inputs.

**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, stakeholder consultation has played a critical role in the identification and management of environmental and social topics for FY2024-25.

The Company conducted a comprehensive materiality assessment in FY2023-24 involving its key stakeholders, including customers, employees, suppliers, contractors, investors, banks, and NGOs. This process enabled the identification of material topics central to Sunteck’s sustainability strategy.

Building upon those insights, Sunteck has actively incorporated stakeholder inputs into ongoing initiatives throughout FY2024-25. The identified issues continue to guide operational planning, ensuring alignment with evolving stakeholder expectations. Regular consultations are held with these groups to gather feedback and new perspectives, which are integrated into the Company’s management approach.

“Annexure - III” (Contd.)

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

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

#### Initiative I: Shelter with Care

As part of our measure towards community welfare, we extended our support to the National Cancer Institute (NCI), a pioneering facility founded under Dr. Aabaji Thatte Sewa Aur Anusandhan Sanstha (Trust). This contribution aids in the establishment of a residential complex designed to offer affordable accommodation to families and caregivers of patients receiving cancer treatment at NCI. The initiative aligns with our belief in compassionate infrastructure and its dedication to sustainable, health-focused philanthropy.

#### Initiative II: Bridges to Recovery

At the heart of our community efforts lies a belief in equal access to quality healthcare. We extended support to Bai Jerbai Wadia Hospital for Children (BJWHC)—a trusted institution offering advanced neonatal and pediatric care to families across socio-economic backgrounds. Recognizing the increasing need for pediatric bone marrow transplants, we contributed to help establish a new step-down Bone Marrow Transplant (BMT) unit. Our contribution enabled vital infrastructure expansion, enhancing post-transplant care and reinforcing BJWHC's life-saving work. Through this initiative, we continue to nurture healthier futures for children in need.

#### Initiative III: Classrooms of Change

Education is more than a steppingstone—it's a catalyst for transformation. Our CSR efforts reflect this belief, driving us to support Bhattarak Yashkirti Shikshan Sansthan and Sanskruti Yuva Pratishthan Trust in their mission to build inclusive learning environments. From establishing state-of-the-art classrooms and skill development spaces, to upgrading campus infrastructure and recreational facilities, our contribution to their corpus funds helps bridge educational gaps in underserved communities.

Our aim is to foster a culture of opportunity—one where every child has the tools to learn, thrive, and imagine a better future.

### 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	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	628	628	100%	587	420	71.55%
Other than permanent	0	0	0	0	0	0
<b>Total employees</b>	<b>628</b>	<b>628</b>	<b>100%</b>	<b>587</b>	<b>420</b>	<b>71.55%</b>
<b>Workers</b>						
Permanent	0	0	0	0	0	0
Other than permanent	0	0	0	0	0	0
<b>Total workers</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

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

“Annexure - III” (Contd.)

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

Category	FY 2024-25					FY 2023-24				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
<b>Permanent</b>	<b>628</b>	<b>0</b>	<b>0</b>	<b>628</b>	<b>100%</b>	<b>587</b>	<b>0</b>	<b>0</b>	<b>587</b>	<b>100%</b>
Male	450	0	0	450	100%	421	0	0	421	100%
Female	178	0	0	178	100%	166	0	0	166	100%
<b>Other than permanent</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
<b>Workers</b>										
<b>Permanent</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
<b>Other than permanent</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	4	2,52,00,000	2	75,00,000
Key Managerial Personnel	1	1,17,20,004	0	Nil
Employees other than BoD and KMP	448	10,00,008	177	9,94,998
Workers	Not applicable			

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

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

	FY 2024-25	FY 2023-24
Gross wages paid to females as % of total wages	24.78%	24.20%

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

Sunteck is determined to foster a safe, respectful, and equitable work environment for all its employees.

The Company has implemented a comprehensive Grievance Redressal Policy that ensures timely, fair, and accessible resolution of employee concerns and is applicable to all employees.

In addition, a formal Code of Conduct has been established, detailing expected standards of behavior, employee responsibilities, and ethical norms. Adherence to this Code is mandatory, underscoring the Company's adherence to integrity and professional accountability.

The Human Resources team is entrusted with overseeing potential human rights impacts and addressing issues related to employee wellbeing. Sunteck maintains a zero-tolerance policy towards sexual harassment, and in compliance with the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013*, a dedicated Internal Complaints Committee has been constituted. This Committee is responsible for addressing any sexual harassment-related complaints in a confidential, sensitive, and legally compliant manner.

"Annexure - III" (Contd.)

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

Sunteck has instituted a comprehensive Grievance Redressal Policy and mechanism that outlines clear processes for addressing employee concerns. This system is designed to ensure fair, timely, and effective resolution of grievances, while safeguarding the confidentiality of the aggrieved individuals. The mechanism reinforces the Company's commitment to fostering a transparent and supportive workplace environment. Further details may be found at: <https://www.sunteckindia.com/investor-relations#codepolicies>.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	Nil	0	0	Nil
Discrimination at workplace	0	0	Nil	0	0	Nil
Child Labour	0	0	Nil	0	0	Nil
Forced Labour/Involuntary Labour	0	0	Nil	0	0	Nil
Wages	0	0	Nil	0	0	Nil
Other human rights related issues	0	0	Nil	0	0	Nil

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

	FY 2024-25	FY 2023-24
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

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

The Company has instituted strong safeguards under its Vigil Mechanism to protect employees who report concerns or participate in investigations. Any form of discrimination, retaliation, or harassment against such individuals is strictly prohibited.

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

The Company's Code of Conduct includes specific clauses incorporated into business agreements, contracts, and purchase orders, ensuring consistent standards across all commercial engagements. Human rights provisions are also an integral part of the Supplier Code of Conduct and are explicitly included in agreements with third-party entities such as contractors. This comprehensive framework outlines expectations for ethical business behavior, covering critical areas such as human rights, corporate ethics, anti-bribery, and anti-corruption practices.

**10. Assessments of the year**

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labor	100%
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others - please specify	Nil

“Annexure - III” (Contd.)

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

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

The Company’s Code of Conduct reflects core values and policies that safeguard the dignity and rights of every individual involved in its ecosystem. To protect employee interests, Sunteck has established a robust whistleblower mechanism that offers employees a safe and anonymous channel for reporting grievances or concerns. To strengthen awareness and alignment with its values, the Company conducts regular training sessions on Human Rights and Prevention of Sexual Harassment (POSH). For FY2024-25, 100% of the workforce has been trained on POSH, and nearly 100% received training on Human Rights.

In FY2024-25, all operations underwent human rights assessments and no significant violations were reported. Sunteck recorded zero cases of child labor, forced labor, involuntary labor, or discriminatory practices. Furthermore, the Company confirms that its operations do not adversely affect indigenous communities or their habitats.

As part of the onboarding process, security personnel are sensitized to human rights protocols, including guidelines that prevent manhandling and ensure respectful engagement at all times.

**Leadership Indicators**

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

As of FY2024-25, no human rights-related grievances or complaints have been reported that necessitated changes or modifications to any existing business processes. The Company regularly reviews and updates its policies and business processes to remain aligned with evolving regulatory frameworks and internal requirements. These reviews ensure that operations continue to reflect best practices and maintain high standards of ethical and legal compliance.

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

Yes, the Company has initiated conducting Human Rights Due Dilligence process to proactively identify and assess potential impacts and risks. Addressing human rights issues is not only a moral obligation but also essential for promoting equality, justice, peace, sustainable development, democracy, and resilience.

**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?**

The Company is committed to fostering an inclusive and accessible work environment. Measures are in place to ensure accessibility across its premises for differently abled visitors.

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

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Sexual harassment	During the current financial year, the company carried out a supply chain assessment for select supplier categories (based on their value to the Company). This assessment covered a range of ESG criteria, including the suppliers' human rights practices.
Discrimination at workplace	
Child labour	
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.**

Not applicable.

"Annexure - III" (Contd.)

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

**Essential Indicators**

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

Parameter	Unit	FY 2024-25	FY 2023-24*
<b>From renewable sources (in gigajoules)</b>			
Total electricity consumption (A)	GJ	-	-
Total fuel consumption (B)	GJ	-	-
Energy consumption through other sources (C)	GJ	-	-
<b>Total energy consumption from renewable sources (A+B+C) (GJ)</b>	GJ	<b>-</b>	<b>-</b>
<b>From non - renewable sources (in gigajoules)</b>			
Total electricity consumption (D)	GJ	5231.35	8352.3
Total fuel consumption (E)	GJ	2029.55	852.78
Energy consumption through other sources (F)	GJ	-	-
<b>Total energy consumption from non - renewable sources (D+E+F) (GJ)</b>	GJ	<b>7260.9</b>	<b>9205.08</b>
<b>Total energy consumption (A+B+C+D+E+F) (GJ)</b>	GJ	<b>7260.9</b>	<b>9205.08</b>
<b>Energy intensity per rupee of turnover</b> (Total energy consumption in GJ/ turnover in rupees in Crores)	<b>GJ/turnover in crores</b>	<b>8.51</b>	<b>16.29</b>
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed / Revenue from operations adjusted for PPP) (In Cr)	<b>GJ/ Revenue from operations adjusted for PPP</b>	<b>175.83</b>	<b>365.04</b>
<b>Energy intensity in terms of physical output</b>	GJ/sqft	<b>0.00095</b>	<b>0.0013</b>

\*Intensity values for FY 2023-24 have been revised and updated

**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.**

Yes, an independent assessment has been carried out by British Standard Institution (BSI) India for FY2024-25.

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

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

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

Parameter	FY 2024-25	FY 2023-24*
<b>Water withdrawal by source (in kiloliters)</b>		
(i) Surface water	-	-
(ii) Groundwater	-	570
(iii) Third party water	90006.43	60298.32
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (In kilolitres) (i + ii + iii + iv + v)</b>	<b>90006.43</b>	<b>60298.32</b>
<b>Total volume of water consumption (In kilolitres)</b>	<b>39910.25</b>	<b>60868.32</b>

"Annexure - III" (Contd.)

Parameter	FY 2024-25	FY 2023-24*
<b>Water intensity per rupee of turnover</b> (Total water consumption / Revenue from operations) (In Cr)	46.781	107.76
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption / Revenue from operations adjusted for PPP) (In Cr)	966.49	2413.84
<b>Water intensity in terms of physical output (per Built-Up area)</b>	0.0052	0.0054

\*Intensity values for FY 2023-24 have been revised and updated

**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.**

Yes, an independent assessment has been carried out by British Standard Institution (BSI) India for FY2024-25.

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

Parameter	Unit	FY 2024-25	FY 2023-24
<b>Water discharge by destination and level of treatment (in kilolitres)</b>			
(i) Surface water	KL	-	-
No treatment	KL	-	-
With treatment - please specify the level of treatment	KL	-	-
(ii) Ground water	KL	-	-
No treatment	KL	50096.18	33970
With treatment - please specify the level of treatment	KL	-	-
(iii) Sea water	KL	-	-
No treatment	KL	-	-
With treatment - please specify the level of treatment	KL	-	-
(iv) Sent to third parties	KL	-	-
No treatment	KL	-	-
With treatment - please specify the level of treatment	KL	-	-
(v) Others	KL	-	-
No treatment	KL	-	-
With treatment - please specify the level of treatment	KL	-	-
<b>Total water discharged (in kilolitres)</b>	KL	<b>50096.18</b>	<b>33970</b>

\*The water discharge values for FY 2023-24 have been revised and updated.

**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.**

Yes, an independent assessment has been carried out by British Standard Institution (BSI) India for FY2024-25.

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

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

"Annexure - III" (Contd.)

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

Parameter	Please specify unit	FY 2024-25	FY 2023-24
NOx	µg/m <sup>3</sup>	19.39	25.39
SOx	µg/m <sup>3</sup>	13.33	16.17
Particulate matter (PM10)	µg/m <sup>3</sup>	68.04	75.84
Particulate matter (PM2.5)	µg/m <sup>3</sup>	34.89	37.26
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others - Ozone Depleting Substances (HCFC - 22 or R-22)	-	-	-

Note: The values provided above are average values basis the test results conducted biannually for all the sites in consideration.

**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.**

Yes, an independent assessment has been carried out by British Standard Institution (BSI) India for FY2024-25.

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

Parameter	Unit	FY 2024-25	FY 2023-24*
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	195.19	63.4
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	1056.44	1909.43
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover (In Cr)</b>	Metric tonnes of CO <sub>2</sub> equivalent/ Revenue	<b>1.47</b>	<b>3.49</b>
<b>Emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (In Cr)</b>	tCO <sub>2</sub> e/USD	<b>30.31</b>	<b>78.23</b>
<b>Emission intensity in terms of physical output (per Built-Up area)</b>	tCO <sub>2</sub> e /sq. ft	<b>0.00016</b>	<b>0.00039</b>

\*The intensity values for FY 2023-24 have been revised and updated.

**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.**

Yes, an independent assessment has been carried out by British Standard Institution (BSI) India for FY2024-25.

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

Sunteck Realty is determined towards enhancing energy efficiency across its operations. In line with its sustainability goals, the Company is in the process of replacing conventional lighting systems with LED fixtures at its offices and project sites.

“Annexure - III” (Contd.)

To further its environmental initiatives, Sunteck has aligned with the EDGE-IFC green building certification program. Sustainable features are incorporated from the design stage of each project to improve resource efficiency. Key measures include:

- Optimizing window-to-wall ratio to reduce energy usage
- Installing roofs with a high Solar Reflectance Index (SRI)
- Implementing solar water heating systems in residential projects
- Using energy-efficient lighting
- Incorporating demand-controlled ventilation systems in parking areas

These efforts support the Company’s objective of constructing environmentally responsible and energy-efficient buildings.

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

Parameter	FY 2024-25	FY 2023-24*
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	3.74	-
E-waste (B)	0.53	-
Bio-medical waste (C)	-	-
Construction and demolition waste (D)	5822.038	26624.49
Battery waste (E)	-	-
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G)	-	-
Other Non-hazardous waste generated (H). Please specify, if any.		
Steel scraps	321.76	108.76
Miscellaneous	50.83	17.1
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>6198.9</b>	<b>26750.35</b>
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) (In Cr)	7.26	47.35
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) (In Cr)	150.11	1060.03
Waste intensity in terms of physical output	0.00081	0.0054
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	376.86	118.29
(ii) Re-used	5822.04	19,676.25
(iii) Other recovery operations	-	-
<b>Total</b>	<b>6198.90</b>	<b>19794.54</b>
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
<b>Category of waste</b>		
(i) Incineration	-	-
(ii) Landfilling	-	6,825.43
(iii) Other disposal operations	-	-
<b>Total</b>	<b>-</b>	<b>6825.43</b>

\*The intensity values for FY 2023-24 have been revised and updated.

“Annexure - III” (Contd.)

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

Yes, an independent assessment has been carried out by British Standard Institution (BSI) India for FY2024-25.

**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.**

Sunteck Realty is determined to responsibly manage their waste across all aspects of business operations. During the current financial year, a large portion of this waste consisted of construction-related materials, particularly mixed concrete and soil, which have been entirely reused on-site for backfilling.

In addition to construction waste, we also manage various non-construction waste streams, such as metal scrap, e-waste, these materials are sent to authorized recycling vendors. For office-generated waste, including paper, cardboard, glass, and other waste, the Company has partnered with a third-party recycling service to ensure the proper disposal and recycling of these materials.

Although office waste is more varied, its quantity remains comparatively small in relation to the construction waste. The Company continues to raise awareness among employees and workers, reinforcing the importance of sustainable waste management practices across the organization.

Processes to safely manage and handle waste material have been employed in several projects developed by the Company.

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

The Company does not have operations or offices located in or near ecologically sensitive areas. However, all current projects have received the necessary Environmental Clearances in accordance with applicable regulations.

In recognition of the importance of biodiversity conservation, the Company initiated project-specific biodiversity assessments during FY 2023-24. These assessments are conducted on a case-by-case basis, depending on the environmental context of each project site.

This marks a key advancement in the Company's sustainability practices, reinforcing its endeavor to ecological preservation and responsible development. By integrating biodiversity considerations into planning and construction processes, Sunteck aims to contribute positively to the environment and promote harmony between development and nature.

One of the ongoing projects is situated near a coastal area. However, strict measures are being taken during the construction phase to ensure that the activities do not have negative impact on the ecology of the area.

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Sunteck One world 4th Avenue	EC22B039MH187085	30/07/2022	Yes	Yes	Nil
Sunteck Beach Residences	SEIAA-EC-0000002157	02/03/2020	Yes	Yes	Nil
Crescent Park	EC23B039MH115088	12/04/2023	Yes	Yes	Nil
	SIA/MH/ INFRA2/464626/2024	12/11/2024	Yes	Yes	Nil

“Annexure - III” (Contd.)

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

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

**Leadership Indicators**

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

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

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

(i) **Name of the area:** Not applicable

(ii) **Nature of operations:** Not applicable

(iii) **Water withdrawal, consumption, and discharge in the following format:** Not applicable

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

Currently, the Company is in the process of estimating Scope 3 emissions.

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

The Company has no operations/offices in/around ecologically sensitive areas. Thus, the Company does not any significant impact on the biodiversity.

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

S. No	Initiative undertaken	Details of the initiative ( <i>Web-link, if any, may be provided along-with summary</i> )	Outcome of the initiative
1.	EDGE building certification	EDGE- IFC, a member of World Bank Group is a green building standard aimed at making buildings more resource-efficient	Target of making projects 20% more resource-efficient
2.	Rainwater harvesting	Company has undertaken rainwater harvesting in order to recycle water and decrease its dependence on third-party sources	Decreased water intensity per sq ft.
3.	Sewage treatment plant	The Company has installed sewage treatment plant in its major projects enabling reduction in water consumptions as wastewater gets 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 select existing projects. This initiative promotes the use of renewable solar energy as an alternative to conventional energy sources.	Energy conservation & Emissions reduction
5.	Use of LED Lightning	LED lighting systems are significantly more energy-efficient compared to traditional incandescent and CFL bulbs. By converting a higher proportion of electricity into light instead of heat, LED fixtures enable substantial energy savings. Their use contributes to improved operational efficiency.	Energy conservation
6.	Low flow aerators	Installed aerators to enhance water efficiency by saving atleast 20% to 30% of water consumption.	Reduction in water consumption

“Annexure - III” (Contd.)

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

Sunteck Realty has implemented a robust Disaster Management Plan to safeguard the health and safety of construction site personnel. The plan includes regular training programs and fire drills that educate workers on fire prevention, detection, and emergency response procedures. Employees are trained to use firefighting equipment and are made familiar with evacuation routes and assembly points. To maintain system reliability, routine inspections and maintenance of fire prevention systems are conducted to promptly address any operational concerns. The on-site Safety Team plays a key role in enforcing hazard prevention and control measures, particularly in the event of natural or unforeseen emergencies.

These proactive measures—emphasizing prevention, early detection, and swift response—help mitigate risks and contribute to a safe and secure working environment across all project sites.

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

Sunteck has conducted a supplier assessment to evaluate the ESG performance of its suppliers. This assessment enabled the company to score suppliers based on their environmental, social, and governance practices.

In addition to the assessment, Sunteck conducted a capacity-building program for its suppliers. As part of this initiative, a comprehensive ESG training was provided, covering key areas such as environmental practices to reduce ecological impact, social responsibilities including fair labor practices and community engagement, and governance principles focused on ethics, transparency, and compliance.

As no significant adverse impacts were identified, no specific mitigation or adaptation measures have been undertaken at this stage.

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

In the current financial year, the value chain partners have not been assessed for environmental impact.

**8. How many green credits have been generated or procured:**

**a. By the listed entity:** None

**b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners:** In FY2024-25, the Company did not evaluate the generation or procurement of green credits by its value chain partners.

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

**Essential Indicators**

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

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

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

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

“Annexure - III” (Contd.)

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

There have not been any 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 FY2024-25.

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

A robust grievance redressal mechanism has been established to address stakeholder concerns in a timely and equitable manner.

Stakeholders can submit grievances through an online form available on the Company's website or via a dedicated email ID designed specifically for grievance communication. All grievance-related activities—including receipt, resolution, and record maintenance—are conducted in accordance with the Grievance Redressal Policy, which is periodically updated to align with best practices and regulatory requirements.

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

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

	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/small producers	0.47%	0.60%*
Directly from within India	100%	100%

\*The values for FY2023-24 have been revised and updated

**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 2024-25	FY 2023-24
Rural	0%	0%
Semi-urban	0%	19.66%
Urban	13.26%	0.24%
Metropolitan	86.74%	80.1%

**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.

“Annexure - III” (Contd.)

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

The Company has undertaken various projects through their CSR initiatives for the well-being of economically weaker sections and under privileged children. Currently, the communities that are being aided do not fall under aspirational districts identified by government bodies.

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

Sunteck Realty does not have a Preferential Procurement Policy that prioritizes sourcing from suppliers belonging to marginalized or vulnerable groups. However, the Company has established a Supplier Code of Conduct and a Material Procurement Policy that incorporate elements of sustainable sourcing, ensuring ethical and environmentally conscious practices across its supply chain.

**(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.

**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 marginalized groups
1.	Shelter with Care	During the current reporting period, the Company undertook several CSR initiatives focused on healthcare, education, and community welfare. These efforts—ranging from supporting affordable residential infrastructure near cancer treatment facilities, enhancing pediatric care services, and strengthening learning environments in underserved regions. Given the nature of these projects and their long-term impact, the exact number of beneficiaries is not quantifiable. However, the potential reach spans countless individuals and families who continue to benefit from these interventions in tangible and transformative ways.	
2.	Bridges to Recovery		
3.	Classrooms of Change		

**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, Sunteck Realty has established accessible grievance redressal platforms to address stakeholder and customer concerns effectively. A dedicated grievance form is available on the Company's website, enabling stakeholders to submit issues directly. Additionally, an app-based platform is available for existing customers across various projects, allowing them to communicate concerns to the facilities management team.

The Company recognizes that grievances provide valuable insights into operational gaps. By identifying and resolving these issues, Sunteck proactively improves its work environment, prevents potential disruptions, and strengthens stakeholder trust.

“Annexure - III” (Contd.)

**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:**

	FY 2024-25		Remarks	FY 2023-24		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0	Nil	0	0	Nil
Advertising	0	0	Nil	0	0	Nil
Cyber-security	0	0	Nil	0	0	Nil
Delivery of essential services	0	0	Nil	0	0	Nil
Restrictive Trade Practices	0	0	Nil	0	0	Nil
Unfair Trade Practices	0	0	Nil	0	0	Nil
Other	654	37	We have 6 cases registered with RERA. The complaints registered are related to maintenance, possession delays, parking issues.	434	25	We have 5 cases registered with RERA. The other issues mainly involve disputes over maintenance charges, which will be addressed during the formation of the society. Additionally, there are complaints related to leakage and seepage that are currently being resolved

**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.**

Sunteck Realty has established a dedicated Cybersecurity Policy that outlines the framework and mechanisms designed to effectively manage and mitigate risks related to privacy and cybersecurity. The policy supports structured information management and ensures the implementation of robust security protocols across the Company’s infrastructure.

By prioritizing data integrity and protection, Sunteck aims to safeguard sensitive information from potential threats, thereby reinforcing its commitment to responsible digital practices and regulatory compliance.. Please find the policy here: <https://www.sunteckindia.com/investor-relations#codepolicies>

"Annexure - III" (Contd.)

**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 corrective actions have been taken relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls as no such instances have been reported in the current financial year.

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

- a. **Number of instances of data breaches-** 0
- b. **Percentage of data breaches involving personally identifiable information of customers-** 0%
- c. **Impact, if any, of the data breaches-** None

**Leadership Indicators**

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

Sunteck Realty ensures transparent communication with its customers by regularly updating its website with detailed information on new projects under development. This digital platform serves as a primary source of project updates and offerings.

In addition, the Company organizes property exhibitions to showcase current and upcoming developments. These events provide an opportunity for direct engagement with customers, allowing them to explore project features, interact with representatives, and receive information tailored to their needs. 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 Realty prioritizes consumer awareness by providing accurate and timely information about properties during handover, including safety protocols covering fire, electrical safety, and emergency preparedness. The facilities team ensures that residents understand their responsibilities as conscious users, encouraging proper waste segregation, water conservation, and a shift toward green power wherever possible. Additionally, the Company offers a Tenant Design Guidelines document aligned with EDGE green building standards, which outlines best practices for sustainable post-occupancy behavior and supports environmentally responsible living.

**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.**

Sunteck Realty ensures that customers receive clear and comprehensive information about its products through various channels, including brochures, marketing partners, on-site sales representatives, and the Company's website. Sustainability features, amenities, and details about the surrounding ecology are highlighted during the sales process via brochures and reinforced at the time of final possession through verbal communication. Product literature also includes information on green ratings and the associated customer benefits, supporting informed decision-making and promoting awareness of environmentally responsible living.

"Annexure - III" (Contd.)

**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 the Company conducted a customer survey to foster regular communication and gain deeper insights into customer experiences. The feedback collected enabled the Company to identify opportunities for improving service quality, enhancing engagement strategies, and bridging gaps in customer interactions, thereby reinforcing its focus on continuous improvement and responsive service delivery.



## INDEPENDENT ASSURANCE OPINION STATEMENT

To the Directors of Sunteck Realty Limited

Holds Statement No.: **BSIV 824377-1**

### Introduction

The **British Standards Institution (BSI)** has been engaged by **Sunteck Realty Limited** to provide an independent limited assurance of the sustainability information (described in the "Scope") included in the SEBI's Business Responsibility and Sustainability Report (BRSR) for the period April 1, 2024 to March 31, 2025 (FY 2024-25).

### Scope

The scope of engagement agreed upon with Sunteck Realty Limited includes the following:

The independent limited assurance covers sustainability information pertaining to SEBI-BRSR-Core, and few other selected Key Performance Indicators (KPIs) in accordance with Annexure-I and Annexure-II respectively, of the Securities and Exchange Board of India (SEBI) vide Circular-number SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated 12<sup>th</sup> July 2023.

This sustainability information is included in the Sunteck Realty Limited's SEBI-BRSR report and ESG Report for the period April 1, 2024 to March 31, 2025 (FY 2024-25).

BSI has performed a limited assurance engagement on whether the Sunteck Realty Limited's disclosures in the - SEBI-BRSR-Core (9 Attributes) and other Principle6 Indicators - are fairly presented, in all respects in accordance with the reporting criteria (refer table below).

Sustainability information subject to limited assurance	Period subject to assurance	Reporting criteria
SEBI-BRSR Core (Refer Annexure I of SEBI vide Circular number SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated July 12, 2023) Principle 6 - Essential & Leadership Indicators - in BRSR framework Annexure-II	April 1, 2024 to March 31, 2025 (FY 2024-25)	<ul style="list-style-type: none"> <li>Regulation 34(2)(f) of SEBI's Listing Obligations and Disclosure Requirements (SEBI LODR)</li> <li>BRSR Core - Framework for assurance and ESG disclosures for value chain (SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated July 12, 2023)</li> <li>Guidance Note for Business Responsibility &amp; Sustainability Reporting Format issued by SEBI (Annexure II - SEBI/HO/CFD/CMD-2/P/CIR/2021/562)</li> </ul>

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### Select BRSR Attributes & Indicators covered:

The independent limited assurance covers the following –

#### A. BRSR Core KPIs which are included in Sunteck Realty Limited's SEBI-BRSR for FY 2024-25:

*(‘P’ represents the 9 Principles of the National Guidelines for Responsible Business Conduct (NGRBC) / ‘E’ represents Essential Indicators, within each Principle in the SEBI-BRSR Format)*

- Green-house gas (GHG) footprint – P6:E7
- Water footprint – P6:E3 and P6:E4
- Energy footprint – P6:E1
- Embracing circularity – P6:E9
- Enhancing employee wellbeing and safety – P3:E1(c) and P3:E11
- Enabling gender diversity in business - P5:E3(b) and P5:E7
- Enabling inclusive development - P8:E4 and P8:E5
- Fairness in engaging with customers and suppliers - P9:E7 and P1:E8
- Open-ness of business - P1:E9

#### B. Other BRSR Indicators -

- P6:E2 - designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India
- P6:E4 - details related to water discharged
- P6:E5 – Zero Liquid Discharge
- P6:E6 – Air Emission (SOx, NOx, PM, VOC, POP, etc)
- P6:E8 – Project related to GHG
- P6:E10 – Waste Management practices
- P6:E11 – ecologically sensitive areas
- P6:E12 – environment impact assessments
- P6:E13 – compliant with the applicable environmental law/ regulations/ guidelines in India

#### C. Other Indicators -

- Equal pay assessment
- Gender Pay Gap
- Absentee Rate

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*[The details of subject matters and their boundaries within the scope is described in Appendix A and Appendix B in this independent assurance opinion statement].*

## Opinion Statement

We have conducted a limited assurance engagement covering the sustainability information described above in "Scope", for the period April 1, 2024 to March 31, 2025 (FY 2024-25).

Based on the procedures we have performed and the evidences we have obtained, nothing has come to our attention that causes us to believe that the accompanying sustainability information is not prepared in all material respects in accordance with the reporting criteria and standards stated above.

## Methodology

Our assurance engagement was carried out in accordance with the ISO 14064-3 and ISAE3000 (Revised) assurance standards following the principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our work was designed to gather evidence on which to base our conclusion. We undertook the following activities:

- Discussion with managers and staff in Sunteck Realty Limited involved in sustainability-management, BRSR-report preparation, provision of data & information, implementation of controls, etc were carried out
- Document review of relevant systems, policies, controls and procedures where available
- Review of supporting evidence for claims made in the reports
- Visit of the major operational & construction sites and the Corporate Office of Sunteck Realty Limited to confirm the data collection processes, record management practices, and check evidence physically
- A sample-based assessment of the reliability and quality of information covered as part of the SEBI-BRSR KPIs with samples considered based on criticality of data points in line with requirements of Limited Assurance

## Responsibility

Sunteck Realty Limited is responsible for the preparation and fair presentation of the sustainability information described in the "Scope" above in accordance with the agreed criteria. BSI is responsible for providing an independent assurance opinion statement to stakeholders of Sunteck Realty Limited, giving our professional opinion based on the scope and methodology described.

## Independence, Quality Control and Competence

BSI is independent to Sunteck Realty Limited and has no financial interest in the operation of Sunteck Realty Limited other than for the assurance of the sustainability statement contained in the SEBI Business Responsibility and Sustainability Report (BRSR).

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This independent assurance opinion statement has been prepared for the stakeholders of Sunteck Realty Limited, for the purposes of verifying its statements relating to SEBI-BRSR report, more particularly described in the Scope above.

This independent assurance opinion statement is prepared based on review by BSI, of information presented to it by Sunteck Realty Limited. In making this independent assurance opinion statement, BSI has assumed that all information provided to it by Sunteck Realty Limited is true, accurate and complete. BSI accepts no liability to any third party who places reliance on this statement.

BSI applies its own management standards and compliance policies for quality control, in accordance with ISO/IEC 17021-1:2015 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

BSI is a leading global standards and assessment body founded in 1901. The BSI assurance team that conducted the assurance has extensive experience in conducting assurance & verification over environmental, social & governance (ESG), and GRI Standards 2021, AA1000AS, ISO 14001, ISO 45001, ISO 14064, ISO 14068, ISO 50001, and ISO 9001, etc. The assurance is carried out in line with the BSI Fair Trading Code of Practice.

Issue Date: 1-8-2025

For and on behalf of BSI:

Sabyasachi Ghosh  
Lead Assurer

Theuns Kotze  
Managing Director BSI India

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**Appendix A: SEBI BRSR CORE Attributes**

SEBI BRSR KPI		Type of Assurance	Value
<b>PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment</b>			
<b>Attribute: Green-house gas (GHG) footprint</b>			
P6:E7	Total Scope 1 GHG emissions tCO <sub>2</sub> e	Limited	195.19
	Total Scope 2 GHG emissions tCO <sub>2</sub> e		1056.44
	GHG emission intensity (Scope 1 +2) (Total tCO <sub>2</sub> e / Revenue from operations) tCO <sub>2</sub> e/INR (In Cr)		1.47
	GHG emission intensity (Scope 1 +2) (Total tCO <sub>2</sub> e / Total Revenue from operations adjusted for PPP) tCO <sub>2</sub> e/USD) (In Cr)		30.31
	GHG emission intensity (Scope 1 +2) (Total tCO <sub>2</sub> e per Built-Up area)		0.000163
<b>Attribute: Water footprint</b>			
P6:E3	Total volume of water withdrawal KL	Limited	90006.43
	Total volume of water consumption KL		39910.25
	Water consumption intensity (KL / Revenue from operations) KL/INR (In Cr)		46.781
	Water consumption intensity (KL / Total Revenue from operations adjusted for PPP) KL/USD (In Cr)		966.49
	Water consumption intensity (KL per Built-Up area)		0.0052
P6:E4	Water discharge by destination & levels of Treatment	Limited	50096.18

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**SUSTAINABLE  
DEVELOPMENT  
GOALS**



SEBI BRSR KPI		Type of Assurance	Value
<b>Attribute: Energy footprint</b>			
P6:E1	Total energy consumed (from renewable and non-renewable sources) GJ	Limited	7260.8972
	% of Energy consumed from renewable sources		0%
	Energy intensity (Megajoules / Revenue from operations) GJ/INR (In Cr)		8.511
	Energy intensity (Megajoules / Total Revenue from operations adjusted for PPP) GJ/USD (In Cr)		175.8342021
	Energy intensity (Giga joules per Built-Up area- sqft)		0.000946669
<b>Attribute: Embracing circularity - details related to waste management by the entity</b>			
P6:E9	Plastic waste, MT	Limited	3.742
	E-waste, MT		0.5294
	Biomedical waste, MT		0
	Construction & Demolition waste, MT		5822.038
	Battery waste, MT		0
	Radioactive waste, MT		0
	Hazardous waste, MT		0
	Other non-hazardous waste MT		372.59
	Total waste generated MT		6198.901
	Waste intensity (MT / Revenue INR from operations) MT/INR (In Cr)		7.26
	Waste intensity (MT / Total Revenue INR from operations adjusted for PPP) MT/USD (In Cr)	150.11	
Waste intensity (MT per Built-Up area- sqft)	<b>0.000808207</b>		
For each category of waste, waste recovered through	Limited		

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SEBI BRSR KPI		Type of Assurance	Value
	<ul style="list-style-type: none"> <li>recycling, – Absolute &amp; Intensity</li> <li>reusing or – Absolute &amp; Intensity</li> <li>recovery – Absolute &amp; Intensity</li> </ul>		Recycling: 376.86 Re-used: 5822.03 Intensity: 1
	For each category of waste, waste disposed by nature of disposal - <ol style="list-style-type: none"> <li>Incineration – Absolute &amp; Intensity</li> <li>Landfill – Absolute &amp; Intensity</li> <li>Coprocessing – Absolute &amp; Intensity</li> </ol>		0
<b>PRINCIPLE 3 Businesses should respect and promote the well-being of all employees, including those in their value chains</b>			
<b><i>Attribute: Enhancing Employee Wellbeing and Safety</i></b>			
P3:E1 (c)	Spending on measures towards well-being of employees and workers (cost incurred on wellbeing measures as a % of total revenue of the company)	Limited	0.101%
P3:E11	Details of safety related incidents for employees and workers including contract-workforce <ol style="list-style-type: none"> <li>Number of permanent disabilities</li> <li>LTIFR</li> <li>Number of fatalities</li> </ol>	Limited	0 0 0
<b>PRINCIPLE 5 Businesses should respect and promote human rights</b>			
<b><i>Attribute: Enabling Gender Diversity in Business</i></b>			
P5:E3 (b)	Gross wages paid to females as % of wages paid by the entity	Limited	24.78%
P5:E7	Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Limited	0

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SEBI BRSR KPI		Type of Assurance	Value
	Complaints on POSH as a % of female employees / workers		0
	Complaints on POSH upheld		0
<b>PRINCIPLE 8 Businesses should promote inclusive growth and equitable development</b>			
<i>Attribute: Enabling Inclusive Development</i>			
P8:E4	Percentage of input material (inputs to total inputs by value) sourced from Suppliers: a. Directly sourced from MSMEs/ small producers b. Directly from within India	Limited	0.47% 100%
P8:E5	Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent/ on contract) as % of total wage cost	Limited	Urban: 13% Metropolitan: 87%
<b>PRINCIPLE 9 - Businesses should engage with and provide value to their consumers in a responsible manner</b>			
<i>Attribute: Fairness in Engaging with Customers and Suppliers</i>			
P9:E7	Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events	Limited	0
<b>PRINCIPLE 1 - Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable</b>			
<i>Attribute: Fairness in Engaging with Customers and Suppliers</i>			
P1:E8	Number of days of accounts payable	Limited	175.91
<i>Attribute: Open-ness of business (audited data provided by Financial Auditor)</i>			
	Concentration of purchases		

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SEBI BRSR KPI		Type of Assurance	Value
P1:E9	a. Purchases from trading houses as % of total purchases	Limited	0.47%
	b. Number of trading houses where purchases are made from		341
	c. Purchases from top 10 trading houses as % of total purchases from trading houses		6.70%
	Concentration of sales	Limited	
	a. Sales to dealers / distributors as % of total sales		0
	b. Number of dealers / distributors to whom sales are made		0
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors		0
	Share of RPTs (as respective percentage) in –	Limited	
	• Purchases		Nil
	• Sales		Nil
• Loans & advances		21.64%	
• Investments		99.61%	

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**Appendix B:**

List of locations which form the boundaries of the sustainability information pertaining to SEBI BRSR Attributes and Indicators

S.NO	Location	Type
1.	National – India	<ul style="list-style-type: none"> <li>Sunteck Centre (Head Office) - SRL 5th Floor, Sunteck Centre, 37-40 Subhash Road, Vile Parle (East), Mumbai – 400 057, Maharashtra, India</li> </ul>
2.	National – India	<ul style="list-style-type: none"> <li>Sunteck City - 4th Avenue - Satguru Ram Mandir Rd, Somani Gram, Goregaon West, Mumbai - 400104, Maharashtra, India</li> <li>Sunteck Maxx World - SRL Naigaon East Vasai Link Road, Naigaon East, Tivri, Mumbai – 401208, Maharashtra, India</li> <li>Sunteck World - One World - SRL Naigaon East Vasai Link Road, Naigaon East, Tivri, Mumbai – 401208, Maharashtra, India</li> <li>Sunteck Beach Residences - Sunteck real Estate Pvt Limited Sunteck Beach Residences (SBR), Suruchi Beach Road, Vasai West – 401201, Maharashtra, India</li> <li>Sunteck Pinnacle (Sunteck City) - Skystar Ram Mandir Road, Somani Gram, Goregaon West, Mumbai – 400104, Maharashtra, India</li> <li>BKC 51 - Sahrish Next to Equinox Business Park, Bandra Kurla Complex, Junction, Mumbai - 400 051, Maharashtra, India</li> <li>Icon - SRL BKC Junction, BKC CST Link Road, MMRDA Area, Santacruz East, Mumbai - 400098 , Maharashtra, India</li> </ul>

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