



ESG POLICY

Sunteck Realty Limited

Version 2.0

Approach and Commitment

At Sunteck Realty Limited (“Sunteck”), we recognize the impact that the Real Estate sector has on both society and the environment. Managing these impacts at our properties & Projects has always been integral to part of our undertakings, not just for enhancing the value and efficiency of our own business, but also for serving our stakeholders.

Our Environmental, Social and Governance Policy (“ESG Policy” or “Policy”) has been implemented with the aim of ensuring ethical, responsible and transparent behavior that is in compliance with applicable laws and regulations across the three dimensions. Through our ESG policy, we endeavor to move towards globally accepted ESG best practices, manage our environmental and social impact, and establish mechanisms for monitoring and continuous improvement of our performance. This Policy draws an inspiration in the ESG endeavor from various standards, benchmarks and frameworks such as IFC’s Corporate Governance Development Framework (2017), relevant Sector-Specific Guidelines, G20/OECD Principles of Corporate Governance etc.

Policy Elements

ENVIRONMENTAL PROTECTION

Managing the environmental impact of Sundeck’s operations is of paramount importance to us, and we aspire to conduct our operations, and design to manage our properties in a way that aligns with this goal. Our endeavor to environmental protection includes the following areas:

Climate Change Adaptation: Seek to assess the impact of various climate-related events and changes in climatic conditions so as to take appropriate measures.

Energy and Fuel Consumption, and Greenhouse Gas Emissions: Strive to conservatively use of energy, fuel and reduction in greenhouse gas emissions.

Waste Management: Endeavour to responsibly dispose waste in accordance with Government regulations with respect to managing hazardous and non-hazardous waste, reuse, recycling and composting.

Water Consumption: Encourage prudent and efficient usage of water and minimize wastage of water during construction and to promote efficient water consumption amongst the tenants and end users.

Biodiversity and Habitat: Strive to minimize the impact on biodiversity at our project sites.

Net Zero: means achieving a balance between the amounts of emissions produced and those removed from the atmosphere in order to reduce global warming.

We recognize the transition to a sustainable future requires bold action and a collective effort. As part of our comprehensive Environmental, Social, and Governance (ESG) Policy, it is our endeavour to achieve net-zero emissions going forward. We recognize the critical importance of reducing our carbon footprint and transitioning to a low-carbon economy and we are working towards developing our net-zero initiative which will entail reducing our greenhouse gas emissions to the greatest extent possible through energy efficiency measures, adopting renewable energy sources, and implementing sustainable practices throughout our operations, some of which are already implemented. Currently, we monitor and measure our greenhouse gas emissions and

implement initiatives to reduce them accordingly. Going forward, assessing our emissions and carbon roadmap, we intend to set science-based targets to ensure meaningful progress towards our net-zero goal. Our progress towards achieving these targets will be monitored and reported to stakeholders on an ongoing basis, fostering trust and demonstrating our commitment for continuous improvement.

SUSTAINABLE PROCUREMENT AND MATERIAL SOURCING

We, at Sunteck, are cognizant of the inherent health and environmental risks associated with building materials and supply chains. Working to minimize these through ethical sourcing, impact assessments and efficiency considerations is a key focus area. Our endeavor in this realm include:

Sustainable Procurement: Encourage the sourcing of sustainable or ethical goods. Additionally, endeavor adoption of ESG performance by suppliers thereby positively impacting the value chain.

Material Sourcing: We put in efforts to promote sustainable alternatives and environmental, social and economic impacts of the procurement and production of products and materials.

STAKEHOLDER RELATIONS AND RESPONSIBILITY

We recognize our responsibility towards each of our stakeholders, including – but not limited to – our employees, communities, customers, contractors and investors. We make every effort to enhance our performance in the following areas,

Stakeholder Relations: Endeavour to engage with stakeholders to understand their priorities and concerns and address their grievances through a grievance redressal mechanism.

Human Rights: Respect human rights of the stakeholder groups across our own operations.

Community Development: Seek to encourage development of the communities within which we operate through our corporate social responsibility initiatives.

Customer Satisfaction: Seek to enhance our customer satisfaction through regular engagements and high quality development projects.

Health and Safety: Endeavour to enhance health, safety and well-being of our stakeholders by encouraging absence of negative impacts through prudent material selection, design and construction.

LABOUR PRACTICES

Providing our workforce with a safe and engaging environment that is conducive to their personal and professional development is integral to the success of our organization. When it comes to our personnel, our endeavors are as under

Labour Standards and Working Conditions: Endeavour to adhere to the highest standards of ethical conduct in our labour practices including no tolerance for child labour, forced labour or bonded labour by our contractors as well.

Further, we also seek to provide our employees and our workers with a safe working environment and the amenities reasonably required to meet the demands of their roles.

Diversity, Equality and Inclusion: Endeavour to recognize merit over discrimination amongst our employees on the basis of sex, race, religion, physical disability, age, cultural background, sexual orientation or any other status when it comes to opportunities and remuneration.

Employee Engagement, Health and Well-Being: Strive to motivate and engage the workforce at workplace based on time to time feedback from the management and identify key health and safety related risks and mitigate the same.

ETHICS AND TRANSPARENCY

Conducting our business in an ethical and transparent manner is integral to earning the trust of our stakeholders. We shall endeavor to provide requisite disclosures in the interest of our stakeholder and facilitate good governance. Following aspects are important:

Bribery, Corruption and Fraud: We adopt an intolerant approach towards bribery, corruption and fraud in the organization.

Shareholder Rights: Endeavour to uphold our shareholders' rights to share in our profitability, income and assets, and general meeting voting rights.

Cybersecurity, Data Protection and Data Privacy

Ensuring the protection and proper use of information systems and data is important from a regulatory, reputational and business perspective. We shall work towards best practices in the following areas:

Cybersecurity: Seek to protect internet-connected systems, including hardware, software and data, from any unauthorized use or access, and safeguard information pertaining to our operations, employees, customers and investors.

Data Protection and Privacy: Endeavour to respect the right of the data / information provider by using the same for its intended purpose unless specifically agreed otherwise.

Policy Implementation

The ESG Policy will be governed by the ESG Committee of Sunteck Realty. The ESG committee will be responsible for reviewing and implementing the ESG Policy. The ESG Committee will oversee the activities related to ESG policy.

Policy Review

The ESG Policy will be reviewed on an annual basis (or as needed) by the ESG Committee.

Policy Linkages

This Policy must be viewed in conjunction with other policies implemented by Sunteck, including – but not limited to – its Human Rights Policy, Board Diversity Policy, Supplier Code of Conduct, Whistleblower Policy, Prevention of Sexual Harassment Policy, Code of Conduct and Corporate Social Responsibility Policy. This policy is applicable to Employees, Suppliers, Contractors, Partners and other stakeholders.

For any queries concerning this Policy, stakeholders may reach out to

<https://www.sunteckindia.com/grievance.php>