

TAX POLICY

Background:

Sunteck Realty Limited (hereinafter referred to as “**Sunteck**” or “**The Company**”) is one of the fastest growing Maharashtra-based luxury real estate company engaged in construction, development, and management of commercial and residential properties.

Sunteck Realty Limited together with its subsidiaries, group companies are hereinafter referred to as Sunteck Group (the “**Group**”).

Approach towards tax:

Sunteck Group strives to manage its business responsibly through a strong, group-wide adherence to the highest standards of integrity, accountability, and transparency. The Tax Policy is guided by the primary consideration that all tax positions taken by the Group must comply with applicable laws and regulations and with the principles that define the Group’s relationships with its main stakeholders and govern how it conducts its business activities.

The goal of the Sunteck Group is to establish an optimal tax position for the Group, which considers sustainability and continuity of the positions chosen over the longer period.

Purpose:

The purpose of this document is to set out the overall approach of the Company and companies controlled directly by the Group in respect of taxation. It lays out the approach towards management and control over its tax affairs and sets out the general framework within which the Group will operate when considering tax related issues.

Scope:

This Policy applies to Sunteck Group. The approach and principles described must be followed with respect to corporate income tax, all other direct and indirect government imposts, including royalties, wherever levied.

Tax Governance:

Availability of compliance system helps to ensure timely completion of all tax related formalities. The Group strives to maintain a transparent relationship with tax authorities, and it is the Group’s endeavor to cooperate with the tax authorities in tax enquiries/audits. The Group has put in place a Taxation Department to oversee how tax risks are identified, managed, and reduced. Significant risks, if any, may be reported to the Board and/or Audit Committee as the need may be. Potential material risks are constantly assessed for the likelihood of any negative financial or reputational impact on the Group and its objectives.

Tax Planning:

The Company strives to highest standards of ethical business practices where its tax practices are based on principles of law which is reflective of its low tax risk approach. The Group engages in efficient tax planning having regard to commercial and economic outlook by taking a holistic view where there is more than one way of structuring a commercial business considering all factors including taxation. The Group's fiscal Policy is to pay taxes legally due in countries within the course of its industrial or commercial activities, hence it is not driven by fiscal considerations or artificial arrangements that shift value to low-tax jurisdictions.

Risk Management:

Though Sunteck Group predominantly operates in India and is compliant with Indian tax regulations, it is also exposed to a variety of tax risks such as transactional, operational, compliance, financial and management risk, as it has certain active overseas operations as well. The Group believes it has an obligation to pay taxes legally due in any country, in accordance with the rules set out by the relevant Governments/revenue authorities. However, while complying with applicable tax law, there can be genuine interpretation differences in the application of certain provisions between the Group and Revenue authorities. This situation may result in disputes leading to tax risk and tax litigation. The Group actively manages tax risks with the aim of mitigating or eliminating them. Where there is uncertainty as to the application or interpretation of tax laws, the Group makes these judgments through the employment of qualified in-house personnel and, where necessary, the use of external advisors.

Tax Compliance:

The Group endeavors to fulfill all fiscal obligations in administering and paying all required taxes. It remains compliant with the tax law in the jurisdictions in which the Group operates and international standards where applicable.

Transfer Pricing Compliance:

Cross-border transactions between members of the Group are conducted on an arms-length basis.