

**BUSINESS RESPONSIBILITY REPORT**

The Directors present the Business Responsibility Report of the Company for the Financial year ended on 31st March, 2017, pursuant to Regulation 34 (2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

1. Corporate Identity Number of the Company: L74899HR1989PLC051918
2. Name of the Company: Omaxe Limited
3. Registered address: Shop No-19-B, First Floor Omaxe Celebration Mall, Sohna Road Gurgaon, Haryana -122001
4. Website: www.omaxe.com
5. E-mail id: secretarial@omaxe.com
(Ms. Shubha Singh, Vice President & Company Secretary)
6. Financial Year reported: 2016-17
7. Sector(s) that the Company is engaged in (industrial activity code-wise):
The Company is primarily engaged in the business of real estate development and the industrial activity code is 681
8. List three key products/services that the Company manufactures/provides (as in balance sheet):
The Company is primarily engaged in construction of integrated township, Hi-tech Township, Group house projects, shopping malls, office spaces, hotels and entertainment zones.
9. Total number of locations where business activity is undertaken by the Company
(a) Number of International Locations: None
(b) Number of National Locations: 27 cities across 8 states
10. Markets served by the Company - The Company has a wide geographical presence across northern and central India operating in 8 states across 27 cities. The Company has launched various projects in Lucknow, Vrindavan, New Chandigarh, Bahadurgarh, Indore, Ludhiana, Faridabad, Ghaziabad, Noida and Greater Noida. Further, the Company has strengthened its foot print in states like Uttar Pradesh, Punjab, Haryana and Madhya Pradesh.

SECTION B: FINANCIAL DETAILS OF THE COMPANY

1. Paid up Capital (INR) : 1,829.01 mn
2. Total Turnover (INR) : 10,790.33 mn (Standalone), 16,856.71 mn (Consolidated)
3. Total profit after taxes (INR): 686.10 mn (standalone), 1,050.66 mn (Consolidated)
4. Total spending on Corporate Social Responsibility (CSR) as percentage of profit after tax: Rs. 24.63 lacs i.e. 0.04%.

The Company had to spend Rs.16.53 mn towards CSR activity in terms of Section 135 of the Companies Act, 2013 read with Rules made thereunder. The Company has spent Rs.24.63 lacs. Though the Company had intended to spend entire CSR budget during this year, there was a delay in commencing the project and hence the entire CSR budget could not be spent.

5. List of activities in which expenditure in 4 above has been incurred:-

Skill Development - The purpose of project is to enhance employment through providing training to National Employment through Apprentice Programme (NETAP) trainees.

NETAP is on the job training program offered by TeamLease Skill University which operates under PPP model between AICTE (MHRD), CII & NDSC. NETAP is governed by the NEEM Notification (National Employability Enhancement Mission) published in the gazette by AICTE as per the AICTE Act of 1987. Its purpose is to:-

- Overcoming the current challenges of the Apprenticeship Act.
- Building skills of unemployed youth through Learning by doing and Learning while earning.
- Providing them with access to practical skills.
- Building a matching infrastructure which connects the youth with the corporate skill requirements.

SECTION C: OTHER DETAILS

1. Does the Company have any Subsidiary Company/ Companies? -
Yes, the Company has 95 Subsidiary Companies as on 31st March 2017.
2. Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent Company? If yes, then indicate the number of such subsidiary company(s): No

3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? - The Company does not mandate its suppliers/ distributors to participate in the Company's BR initiatives. However, they are encouraged to adopt such practices and follow the concept of being a responsible business.

SECTION D: BR INFORMATION

1. Details of Director/Directors responsible for BR

(a) Details of the Director/Director responsible for implementation of the BR policy/policies

1. DIN Number - 00003735
2. Name - Rohtas Goel
3. Designation - Chairman and Managing Director

(b) Details of the BR head

S. No	Particulars	Details
1.	DIN Number (if applicable)	Not Applicable
2.	Name	Shubha Singh
3.	Designation	Vice President & Company Secretary
4.	Telephone number	011-41893100/6776/6680
5.	e-mail id	secretarial@omaxe.com

2. Principle-wise (as per NVGs) BR Policy/policies (Reply in Y/N):

The National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business (NVGs) released by the Ministry of Corporate Affairs has adopted nine areas of Business Responsibility. These briefly are as follows:

Principle-wise index:

P1	– Business should conduct and govern themselves with ethics, Transparency and Accountability
P2	– Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle
P3	– Businesses should promote the wellbeing of all employees
P4	– Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalised
P5	– Businesses should respect and promote human rights
P6	– Business should respect, protect, and make efforts to restore the environment
P7	– Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner
P8	– Businesses should support inclusive growth and equitable development
P9	– Businesses should engage with and provide value to their customers and consumers in a responsible manner

No	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for...	Y	Y	Y	Y	Y	Y	Y	Y	Y
2	Has the policy being formulated in consultation with the relevant stakeholders?	The Company has formulated the policies while taking into account the stakeholders' expectations and adopted best practices.								
3	Does the policy conform to any national / international standards? If yes, specify? (50 words)	Yes, the policy/practice broadly confirms to the National Voluntary Guidelines (NVGs) issued by the Ministry of Corporate Affairs, Government of India, July 2011.								
4	Has the policy being approved by the Board? If yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director?	Yes.								
5	Does the company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy?	Yes								



6	Indicate the link for the policy to be viewed online?	investors section on www.omaxe.com
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Internal & external stakeholders are communicated / made aware about the policies to the extent possible. Also the same is available on the corporate website.
8	Does the company have in-house structure to implement the policy/ policies?	Yes
9	Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy/ policies?	Yes
10	Has the Company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	All the policies have been formulated taking into account the stakeholders' expectations and the Company reviews policies.

(b) If answer to the question at serial number 1 against any principle, is 'No', please explain why: (Tick up to 2 options) : Not Applicable

No	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	The company has not understood the Principles									
2	The company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles									
3	The company does not have financial or manpower resources available for the task									
4	It is planned to be done within next 6 months									
5	It is planned to be done within the next 1 year									
6	Any other reason (please specify)									

3. Governance related to BR

Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year : The Board of Directors assesses the Company's performance once in three years.

Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published? :- The Company's BR Report alongwith policies are available in investors section on corporate website www.omaxe.com.

satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

The Company has Investor Grievance Cum Stakeholder Relationship Committee which reviews the shareholders complaints and their resolution. During the year ended March 31, 2017 opening balance of the complaints was 1 and 4 complaints were received from the shareholders, all of which were satisfactorily attended except 1 complaint pending at the end of the year which were related to the Consumer Court case.

SECTION E: PRINCIPLE-WISE PERFORMANCE

Principle 1

1. Does the policy relating to ethics, bribery and corruption cover only the company? Yes/ No. Does it extend to the Group/Joint Ventures/ Suppliers/Contractors/NGOs / Others?

The policy relating to ethics, bribery and corruption is applicable only to the Company. However, the Code of Conduct and Whistle Blower Policy of the Company cover other stakeholders as well.

2. How many stakeholder complaints have been received in the past financial year and what percentage was

Principle 2

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.-

The Company is primarily engaged in construction sale and leasing of townships, group housing projects, shopping malls, office spaces, hotels and entertainment zones.

a. The Company implements building structure designs that are safer than what is mandatorily required under the requisite building code.

b. The Company is designing and upgrading buildings environment friendly in across India and in continuation with the Company and its contractors attempt to provide hygiene and healthy working environment to workers

at construction sites including training to improve the capabilities of the local work force.

2. For each such product, provide the details in respect of resource use (energy, water, raw material etc.) per unit of product (optional): No Comments
3. Does the Company have procedures in place for sustainable sourcing (including transportation)?

- (a) If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.

Yes, Sustainable practices have always been an integral part of our business strategy. The Company put all its efforts to ensure 100% of the inputs are sustainably sourced. Further the Company gives preference in selection of vendors for procurement of raw material, who comply with the various principles of sustainability. Majority of suppliers of raw material are located in proximity of the construction projects of the Company which helps minimize transportation.

The Company's vendors have to ensure compliance to its environment, health and safety measures. It covers various issues like health of their workers deployed, safety measures (helmet, rope, safetybelt etc.) adopted, discharge from equipment, hygiene norms, safe vehicles hired, age of vehicles used etc. Vendors are asked to sign the Company's Code of Conduct for every contract awarded, in order to ensure ethical practices are followed throughout the entire supply chain.

4. Has the Company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?
 - (a) If yes, what steps have been taken to improve their capacity and capability of local and small vendors?

The Company sources its construction related raw material and other consumables from local and small vendors, as far as possible. The Company's contractor who supplies labour services at the construction sites employ workmen from nearby communities.

5. Does the company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.

The Company disposes some of the construction waste as a scrap to get them recycled and re-use the same in construction works. The Company has initiated waste management by re-cycling waste into compost used

for agriculture. The Company has deployed sewage treatment plants at its projects and construction sites which treat and re-cycle waste water for reusing in watering plants, toilets etc.

Principle 3

1. Please indicate the total number of employees - 801
2. Please indicate the total number of employees hired on temporary/contractual/casual basis - 16
3. Please indicate the number of permanent women employees - 85
4. Please indicate the Number of permanent employees with disabilities - Nil
5. Do you have an employee association that is recognized by management – No such employee association is recognized by the Management
6. What percentage of your permanent employees is members of this recognized employee association? – Not Applicable
7. Please indicate the Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.

Sl. No.	Category	No of complaints filed during the financial year	No of complaints pending as on end of the financial year
1.	Child labour/ forced labour/ involuntary labour	Nil	Nil
2.	Sexual harassment	Nil	Nil
3.	Discriminatory employment	Nil	Nil

8. What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?
 - (a) Permanent Employees - 10%
 - (b) Permanent Women Employees - 10%
 - (c) Casual/Temporary/Contractual Employees - Nil
 - (d) Employees with Disabilities - Not Applicable

Principle 4

1. Has the company mapped its internal and external stakeholders? - Yes.



2. Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders.
- Yes
3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so. – Yes, as a socially responsible organization, we are committed to the welfare of the communities around us.

Principle 5

1. Does the policy of the company on human rights cover only the company or extend to the Group/Joint Ventures/Suppliers/Contractors/NGOs/Others? - The Company's policy and practices relating to protection of human rights viz., non-engagement of child labour, assuring safety measures etc. is applicable to the Company and its subsidiaries as well as to the contractors engaged by the Company.
2. How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management? - No complaints of this nature were received in this financial year.

Principle 6

1. Does the policy related to Principle 6 cover only the company or extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/others.

The policy and practices relating to Principle 6 primarily cover only the Company and its group companies. However, there is an endeavor to do business with such entities which have adopted this principle.

2. Does the company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc? Y/N. If yes, please give hyperlink for webpage etc.

No, The Company is in progress to take initiatives to address the global environmental issues like climate change, global warming etc.

3. Does the company identify and assess potential environmental risks? Y/N - Yes
4. Does the company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed? - No
5. Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc. - Yes, The Company takes continuous measures to

implement the latest and cost-effective clean technology that increases energy efficiency.

6. Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported? - The emissions/waste generated by the company is within the required permissible limits and are being reported twice in a year to the concerned authorities.
7. Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year. - One such notice has been issued by Haryana SPCB, which has been adequately replied and is pending for consideration.

Principle 7

1. Is your company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with: - Yes, the major trade bodies, Chambers and Associations that our business deals with are:
 - a. Federation of Indian Chamber of Commerce and Industry (FICCI)
 - b. The Associated Chambers of Commerce and Industry of India (ASSOCHAM)
 - c. PHD Chamber of Commerce and Industry (PHDCCI)
2. Have you advocated/lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas (drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)

The Company brings forth its concerns before the Government and other concerned departments through Industry forums and chambers. Further Company participates in initiatives taken by these trade bodies, specifically those related to Governance and Administration, Economic Reforms & Inclusive Development Policies.

Principle 8

1. Does the company have specified programmes/ initiatives/projects in pursuit of the policy related to Principle 8? If yes details thereof. - Yes, such details are forming part of CSR Report.
2. Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization? - Depending on the various aspects, programmes/projects are undertaken either in-house or through trusts or in collaboration with other external organizations/ NGOs.

3. Have you done any impact assessment of your initiative?
- The Company routinely monitors the effectiveness of its CSR initiatives.
 4. What is your company's direct contribution to community development projects- Amount in INR and the details of the projects undertaken. - Such details are forming part of CSR Report.
 5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so. - Wherever a project comeup, we strive to engage local communities through employment opportunities and community welfare measures. We lay emphasis on skill development and employment generation to improve the skillset and in turn, their standard of living. The Company's CSR project on NETAP also endeavors in this direction.
2. Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A./Remarks (additional information) – information of the product is displayed in the advertisement, application form, agreement and other relevant documents as per the requirement of relevant laws.
 3. Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behavior during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.

There is no anti-competitive, abuse of dominant position or unfair trade practices cases pending against the Company.
 4. Did your company carry out any consumer survey/ consumer satisfaction trends?

Yes, the company gathers information through "Customer Feedback Form" which is studied to improve the offerings to the customers. In addition, through the Company's website (www.omaxe.com/-omaxe-care) tab, the customer's views are collected to understand the satisfaction level and trend.

Principle 9

1. What percentage of customer complaints/consumer cases are pending as on the end of financial year. - Around 55 percent of customer complaints/consumer cases received during the FY are pending for legal redressal.