

# BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT 2024-25

# BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

## **SECTION A: GENERAL DISCLOSURES**

- I. Details of the listed entity
  - 1. Corporate Identity Number (CIN) of the Listed Entity: L74899HR1989PLC051918
  - 2. Name of the Listed Entity: Omaxe Limited
  - 3. Year of incorporation: 1989
  - **4. Registered office address:** Shop No-19-B, First Floor Omaxe Celebration Mall, Sohna Road, Gurugram-122001 Haryana
  - 5. Corporate address: 7, Local Shopping Complex, Kalkaji, New Delhi-110019
  - 6. E-mail: secretarial\_1@omaxe.com
  - **7. Telephone:** 011-41893100
  - 8. Website: www.omaxe.com
  - 9. Financial Year (FY) for which reporting is being done: 2024-25
  - **10. Name of the Stock Exchange(s) where shares are listed:** BSE Limited (BSE), National Stock Exchange of India Limited (NSE)
  - 11. Paid-up Capital: Rs. 1,82,90,05,400/-
  - 12. Name and contact details (telephone, e-mail address) of the person who may be contacted in case of any queries on the BRSR report:

Name: Mr. D B R Srikanta Designation: Company Secretary & Compliance Officer

Telephone: +91 11-4189-3100; E-mail Id: secretarial\_1@omaxe.com

13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).

The disclosures under this report are made on a standalone basis.

- 14. Name of assurance provider: Not Applicable
- 15. Type of assurance obtained: Not Applicable
- II. Products/ Services
  - 16. Details of business activities (accounting for 90% of the entity's turnover):

S. No.	Description of main activity	Description of business activity	% of turnover of the entity
1	Real Estate	Real Estate	83.08%
		Activities with own	
		or leased property	

#### 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	Real Estate Projects	681	83.08%



#### III. Operations

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

Location	Number of plants	Number of offices	Total
National	0	31	31
International	0	0	0

<sup>\*</sup>Cities in which the Company currently operates its business and has its projects.

#### 19. Markets served by the entity:

#### a. Number of locations

Locations	Number
National (No. of States)	8*
International (No. of Countries)	Nil

<sup>\*</sup>States in which the Company currently operates its business and has its projects.

# b. What is the contribution of exports as a percentage of the total turnover of the entity? Not Applicable

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

Omaxe is one of the leading real estate companies in North India that has been contributing to sustainable infrastructure with its diverse portfolio which includes residential, commercial and retail projects that cater the needs of businesses as well as individual customers. Omaxe's real estate portfolio comprises of the following:

- Residential including housing projects, integrated township, residential plots that serve residential customers;
- **ii. Commercial and Retail** including malls, sports complexes, shopping complexes, plots and recreational spaces.

## IV. Employees

#### 20. Details as at the end of FY:

#### a. Employees and Workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/ A)	No. (C)	% (C/ A)
		EMPLO	<b>YEES</b>			
1.	Permanent (D)	484	439	90.70%	45	9.29%
2.	Other than Permanent (E)	8	7	87.5%	1	12.5%
3.	Total employees (D+E)	492	446	90.65%	46	9.34%
		WORK	ERS			
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	404	323	79.95%	81	20.04%
6.	Total workers (F+G)	404	323	79.95%	81	20.04%

# b. Differently abled Employees and Workers:

S. No.	Particulars	Total (A)	Male		Female		
			No. (B)	% (B/ A)	No. (C)	% (C/ A)	
	DIFFERENTLY	ABLED EM	IPLOYEE	S			
1.	Permanent (D)	2	1	50%	1	50%	
2.	Other than Permanent (E)	0	0	0	0	0	
3.	Total differently abled employees (D+E)	2	1	50%	1	50%	
	DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	0	0	0	0	0	
5.	Other than Permanent (G)	0	0	0	0	0	
6.	Total differently abled workers (F+G)	0	0	0	0	0	

## 21. Participation/Inclusion/Representation of women

	Total (A) No. and percentage of Fe		tage of Females
		No. (B)	% (B/ A)
Board of Directors	6	2	33.33%
Key Managerial Personnel	3	0	0

# 22. 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	8.51	14.43	9.07	17.83%	36.96%	19.22%	1.42%	2.22%	1.07%
Permanent Workers	0	0	0	0	0	0	0	0	0

Turnover Rate of Permanent employees is based on the number of Permanent Employee on the Payroll of Omaxe Ltd as at the end of year

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

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

S. No.	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	Indicate whether Holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Y/N)
1.	Guild Builders Private Limited	Holding	63.57	
2.	Anjaniputra Builders Private Limited	Subsidiary	100	
3.	Aashna Realcon Private Limited	Subsidiary	100	
4.	Aradhya Real Estate Private Limited	Subsidiary	100	No
5.	Arman Builders Private Limited	Subsidiary	100	The Subsidiaries are
6.	Atulah Contractors and Constructions Private Limited	Subsidiary	100	separate legal entities, hence they follow
7.	Ayush Landcon Private Limited	Subsidiary	100	Business Responsibility
8.	Be Together Developers Private Limited	Subsidiary	100	Initiatives as per laws
9.	Be Together Infra Projects Private Limited	Subsidiary	100	applicable to them.
10.	Blackbull Retails Private Limited	Subsidiary	100	
11.	Chapal Buildhome Private Limited	Subsidiary	100	
12.	Colors Real Estate Private Limited	Subsidiary	100	



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? (Y/N)	
13.	Dhanu Real Estate Private Limited	Subsidiary	100		
14.	FBD Real Grow Private Limited	Subsidiary	100		
15.	Giant Dragon Mart Private Limited	Joint Venture	50		
16.	Golden Glades Builders Private Limited	Subsidiary	100		
17.	Green Planet Colonisers Private Limited	Subsidiary	100		
18.	Hamara Ghar Constructions and Developers Private Limited	Subsidiary	100		
19.	Hartal Builders and Developers Private Limited	Subsidiary	75		
20.	Jagdamba Contractors and Builders Limited	Subsidiary	100		
21.	JKB Constructions Private Limited	Subsidiary	100		
22.	JRS Projects Private Limited	Subsidiary	100		
23.	Kamini Builders and Promoters Private Limited	Subsidiary	100		
24.	Kashish Buildtech Private Limited	Subsidiary	100		
25.	Khushiyon Ka Ghar Private Limited	Subsidiary	100		
26.	Landlord Developers Private Limited	Subsidiary	100		
<del>27.</del>	Link Infrastructure and Developers Private Limited	Subsidiary	100		
28.	Ludhiana Wholesale Market Private Limited	Subsidiary	100	No	
29.	Mehboob Builders Private Limited	Subsidiary	100	The Subsidiaries are	
30.	Mehtab Infratech Private Limited	Subsidiary	100	separate legal entities,	
31.	Monarch Villas Private Limited	Subsidiary	100	hence they follow	
32.	MR Real Estate Private Limited	Subsidiary	100	Business Responsibility	
33.	National Affordable Housing Limited	Subsidiary	100	Initiatives as per laws	
34.	Navratan Techbuild Private Limited	Subsidiary	100	applicable to them.	
35.	Nexten (I) Growth Private Limited	Subsidiary	100		
36.	Nexten Infra Growth Private Limited	Subsidiary	100		
37.	Nexten Infra Private Limited	Subsidiary	100		
38.	Nexten Real Growth Private Limited	Subsidiary	100		
39.	Nexten Super Growth Private Limited	Subsidiary	100		
40.	Oasis Township Private Limited	Subsidiary	100		
41.	Omaxe Be Together Amausi Busport Private Limited	Subsidiary	100		
42.	Omaxe Be Together Ayodhya Busport Private Limited	Subsidiary	100		
43.	Omaxe Be Together Ghaziabad Busport Private Limited	Subsidiary	100		
44.	Omaxe Be Together Kaushambi Busport Private Limited	Subsidiary	100		
45.	Omaxe Be Together Lucknow Busport Private Limited	Subsidiary	100		
46.	Omaxe Be Together Prayagraj Busport Private Limited	Subsidiary	100		
47.	Omaxe Be Together Projects Developers Private Limited	Subsidiary	100		
48.	Omaxe Buildhome Limited	Subsidiary	100	1	
49.	Omaxe Buildwell Limited	Subsidiary	100	-	
50.	Omaxe Entertainment Limited	Subsidiary	100		

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? (Y/N)
51.	Omaxe Forest Spa and Hills Developers	Subsidiary	100	
	Limited			
52.	Omaxe Garv Buildtech Private Limited	Subsidiary	100	
53.	Omaxe Heritage Private Limited	Subsidiary	100	
54.	Omaxe Hitech Infrastructure Company Private Limited	Subsidiary	100	
55.	Omaxe Housing and Developers Limited		100	
56.	Omaxe Indore Developers Limited	Subsidiary	100	
57.	Omaxe Infrastructure Limited	Subsidiary	100	
58.	Omaxe International Bazaar Private Limited	Subsidiary	100	
59.	Omaxe New Amritsar Developers Private Limited	Subsidiary	100	
60.	Omaxe New Chandigarh Developers Private Limited	Subsidiary	100	
61.	Omaxe New Faridabad Developers Private Limited	Subsidiary	100	
62.	Omaxe Next Private Limited	Subsidiary	100	
63.	Omaxe Pancham Realcon Private Limited	Subsidiary	100	
64.	Omaxe Power Private Limited	Subsidiary	100	
65.	Omaxe World Street Private Limited	Subsidiary	100	
66.	Omtech Infrastructure and Construction Limited	Subsidiary	100	N -
67.	Pam Developers [India] Private Limited	Subsidiary	100	<b>No</b> The Subsidiaries are
68.	Panchi Developers Private Limited	Subsidiary	100	separate legal entities,
69.	Parshwa Veer Builders and Developers Private Limited	Subsidiary	100	hence they follow Business Responsibility
70.	PP Devcon Private Limited	Subsidiary	100	Initiatives as per laws
71.	Primordial Buildcon Private Limited	Subsidiary	100	applicable to them.
72.	Radhika Buildwell Private Limited	Subsidiary	100	
73.	Rivaj Infratech Private Limited	Subsidiary	51	
74.	Sarthak Landcon Private Limited	Subsidiary	100	
75.	Sarva Buildtech Private Limited	Subsidiary	100	
76.	Shamba Developers Private Limited	Subsidiary	100	
77.	Shikhar Landcon Private Limited	Subsidiary	100	
78.	Silver Peak Township Private Limited	Subsidiary	100	
79.	Sri Balaji Green Heights Private Limited	Subsidiary	100	
80.	Worldstreet Sports Center Limited	Subsidiary	100	
81.	Zodiac Housing and Infrastructure Private Limited	Subsidiary	100	
82.	Omaxe Capital Development Private Limited (Formerly known as Capital Redevelopment Private Limited)	Subsidiary	100	
83.	Nexten Township Private Limited	Subsidiary	100	
84.	Nexten Cityspace Realty Private Limited	Subsidiary	100	
85.	Aadhira Developers Private Limited	Subsidiary	100	
86.	Aarzoo Technobuild Private Limited	Subsidiary	100	
87.	Abhas Realcon Private Limited	Subsidiary	100	
88.	Abheek Builders Private Limited	Subsidiary	100	
89.	Adesh Realcon Private Limited	Subsidiary	100	
90.	Anveshan Builders Private Limited	Subsidiary	100	



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? (Y/N)
91.	Ashok Infrabuild Private Limited	Subsidiary	100	
92.	Ashray Infrabuild Private Limited	Subsidiary	100	
93.	Aviral Colonizers Private Limited	Subsidiary	100	
94.	Bhanu Infrabuild Private Limited	Subsidiary	100	
95.	Caspian Realtors Private Limited	Subsidiary	100	
96.	Daman Builders Private Limited	Subsidiary	100	
97.	Damodar Infratech Private Limited	Subsidiary	100	
98.	Davesh Technobuild Private Limited	Subsidiary	100	
99.	Dinkar Realcon Private Limited	Subsidiary	100	
100.	Ekansh Buildtech Private Limited	Subsidiary	100	
101.	Ekapad Developers Private Limited	Subsidiary	100	
102.	Estatelance Developers Private Limited		100	
103.	Estatelance Real Estate Private Limited	•	100	_
104.	Glacier Agro Food Products Private Limited	Subsidiary	100	
105.	Hemang Buildcon Private Limited	Subsidiary	100	
106.	Hiresh Builders Private Limited	Subsidiary	100	
107.	Kavya Buildtech Private Limited	Subsidiary	100	
108.	Manit Developers Private Limited	Subsidiary	100	_
109.	Navadip Developers Private Limited	Subsidiary	100	
110.	NRI City Developers Private Limited	Subsidiary	100	_
111.	Oasis Suncity Realtors Private Limited	Subsidiary	100	No
112.	Omaxe Housing and Infrastructure Limited	Subsidiary	100	The Subsidiaries are separate legal entities,
113.	Omaxe India Trade Centre Private Limited	Subsidiary	100	hence they follow Business Responsibility
114.	Omaxe Infotech City Developers Limited	Subsidiary	100	Initiatives as per laws applicable to them.
115.	Radiance Housing And Properties Private Limited	Subsidiary	100	
116.	Reliable Manpower Solutions Limited	Subsidiary	99.18	
117.	RPS Suncity Promoters & Developers Private Limited	Subsidiary	100	
118.	Rupesh Infratech Private Limited	Subsidiary	100	
119.	S N Realtors Private Limited	Subsidiary	100	
120.	Salvatore Infra Buildtech Ltd.	Subsidiary	100	
121.	Sanvim Developers Private Limited	Subsidiary	100	_
122.	Satkar Colonisers Private Limited	Subsidiary	100	-
123.	Satvik Hitech Builders Private Limited	Subsidiary	100	-
124.	Secure Properties Private Limited	Subsidiary	100	-
125.	Shubh Bhumi Developers Private Limited	Subsidiary	100	-
126.	Tejpal Infra Developers Private Limited	Subsidiary	100	-
127.	Utkrisht Real Estate & Associates Private Limited	Subsidiary	100	
128.	Dreamze New Faridabad Developers LLP	Subsidiary	99.99	
129.	Shine Grow New Faridabad LLP	Subsidiary	99.99	
130.	KSONS Buildwell LLP	Subsidiary	65	
131.	Parkash Omaxe Amusement Park Private Limited	Joint Venture	50	
132.	Be Together Music Private Limited	Associate	50	

#### VI. CSR Details

24. Whether CSR is applicable as per section 135 of Companies Act, 2013: (Y/N): No

(i) Turnover: 389.85 Cr (ii) Net worth: 657.42 Cr

#### VII. Transparency and Disclosures Compliances

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

Stakeholder	Grievance Redressal		FY 2024-25		FY 2023-24				
group from whom complaint is received	Mechanism in Place (Y/ N) (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	N.A.	0	0	-	0	0	-		
Investors (other than shareholders)	Yes. The contact details for grievance redressal are available at https://www.omaxe.com/investor/address-for grievance-redressal and-other-details.	0	0	-	0	0	-		
Shareholders	Yes. The contact details for grievance redressal are available at https://www.omaxe. Com/investor/contact information-of-the designated-officials.	7	1	-	2	0	-		
Employees and Workers	Yes. Grievance redressal mechanisms are available in intranet as per the Company's HR policy.	02	01	-	0	0	-		
Customers	Yes. Grievance redressal mechanisms are available	297	246	-	151	121	-		
Value Chain Partners	-	0	0	-	0	0	-		
Others (Please Specify)	-	0	0	-	0	0	-		

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

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/ 0)	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	Physical Impacts of Climate Change	Risk	Refer to Point 1 below	Refer to Point 1 below	Negative
2	Health and Safety	Risk	Refer to Point 2 below	Refer to Point 2 below	Negative
3	Environment	Opportunity	Refer to Point 3 below	Refer to Point 3 below	Positive
4	Customer/Buyer Satisfaction	Opportunity	Refer to Point 4 below	Refer to Point 4 below	Positive
5	Product & Service Quality	Opportunity	Refer to Point 5 below	Refer to Point 5 below	Positive

#### 1. Physical Impacts of Climate Change

**Risk:** Adapting to climate change and its associated risks is imperative for business continuity. Managing our GHG footprint and making focused efforts for reduced emissions reduction is critical for us to remain a sustainable business. Ineffective management of our GHG footprint may expose us to physical and transition risk thereby adversely impacting business resilience and growth.

**Rationale/ Mitigation Measures:** 1. Implement a robust data monitoring framework for external reporting 2. Implement interventions to bridge gaps in climate change mitigation measures, compliance gaps.

## 2. Health and Safety

**Risk:** For real estate companies, it is essential to inherent risks associated with property management, construction, and maintenance activities. Providing a safe work environment and preventing accidents are paramount to protecting employees, contractors, and tenants from potential hazards. Compliance with safety regulations is not only a legal obligation but also a critical factor in mitigating financial risks related to workplace injuries, liability claims, and potential fines

Rationale/ Mitigation Measures: 1. Our H&S Management system is aligned with industrial norms, conducting thorough audits and risk assessments. 2. Comprehensive training programs ensure staff are versed in safety protocols. Robust incident reporting and transparent communication foster a safety culture, while regular monitoring and reviews enhance effectiveness.

#### 3. Environment

**Opportunity/ Rationale:** Focused efforts to protect the biodiversity in and around our operations and mitigating potential risks is a critical priority for our business. It enhances our environmental impact and garners positive relationships with local communities and our stakeholders.

# 4. Customer/Buyer Satisfaction

**Opportunity/ Rationale:** Customer satisfaction is a vital part of our business model, serving as a key indicator of our overall performance and brand value. It offers valuable insights into customer expectations and highlights areas where we can enhance our service and experience. By understanding customer needs and evaluating the

quality of our products, we can continuously improve our service standards and ensure a consistently high level of customer satisfaction.

# 5. Project & Service Quality

**Opportunity/ Rationale:** Our foremost priority is to create exceptional customer experiences through best-inclass service delivery, underpinned by an unwavering commitment to quality. By consistently providing superior products and services—such as impeccably maintained properties, efficient property management, and responsive customer support—we strengthen our relationships with tenants, investors, and other key stakeholders.

#### **SECTION B: MANAGEMENT AND PROCESS DISCLOSURES**

This section describes the structures, policies and processes put in place by the Company for aligning with the nine principles of business responsibility as per the National Guidelines for Responsible Business Conduct (NGRBC).

- P1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.
- P 2 Businesses should provide goods and services in a manner that is sustainable and safe.
- P 3 Businesses should respect and promote the well-being of all employees, including those in their value chains.
- P 4 Businesses should respect the interests of and be responsive to all its stakeholders.
- P 5 Businesses should respect and promote human rights.
- P 6 Businesses should respect and make efforts to protect and restore the environment.
- P 7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
- P 8 Businesses should promote inclusive growth and equitable development.
- P 9 Businesses should engage with and provide value to their consumers in a responsible manner.

Dis	clos	ure Questions	P1	P2	P 3	P 4	P5	P 6	P 7	P8	P9
P0	LICY	AND MANAGEMENT PROCESSES									
1.	a.	Whether your entity's policy/ policies cover each principle and its core elements of the NGRBCs. [Yes/ No (Y/ N)].	Y	Y	Y	Y	Y	Y	Y	Y	Y
	b.	Has the policy been approved by the Board? (Y/ N).		ver nece quisite a					before	the E	Board
	C.	Web Link of the Policies, if available.	policies	l policie s. Omaxe n be refe	policies	s is align	ed with	all the 9	NGRÉC	Princ	
2. Whether the entity has translated the policy into procedures (Y/ N)				Υ	Y	Υ	Υ	Y	Υ	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Y/ N).				Υ	Y	Y	Υ	Υ	Y	Y	Y



Dis	closure Questions	P1	P2	P 3	P 4	P5	P 6	P 7	P8	P9
4.	Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, and Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	Omaxe	Limit	ating from	impler	menting		rnationa mats.	al co	odes/
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	standar	ds and	rocess o setting ameworl	the goa					
	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	standar	ds and	rocess o setting ameworl	the goa					
GO	VERNANCE, 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).	sustainability in all our operations. We strive to exceed societal and governmental expectations while putting stakeholders first.							cietal first. rough water ctices cture. ental g the ability	
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility Policy (ies).	The Bo	ard of D	ile world irectors egular bi	are sup				ig Dire	ector,
9.	Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Y/ N). If yes, provide details.	CSR Coreviews  Risk Mrisk mmethod monitor	mmitted the CSI anagement ology, proposed to compa	nittees a elated is e: The C R activiti nent Con nent pro- processe te and m any incl	SR comes (if an mmitteen cesses and so itigate ruding f	mittee y) of the e (RMC) and e systems isks ass inancial	of the E compa compa compa de Compa de	Board grany.  RMC rethat a place I with that that the place I with the pational,	eviews approp to ide	s and s the oriate entify, iness

10.	<b>Details</b>	of Review of	of NGRBCs	by the Company:
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Subject for Review								ken by er Cor			(A)	nnual	ly/ Ha		equer rly/ Q	•	·ly/ Ar	ny oth	er)
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Quarterly & Annually								
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	Y	Υ	Y	Y	Y	Y	Y	Y	Y	Y	Quarterly & Annually								
11. Has the entity ca the working of it			•								P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
provide name of	the a	genc	y								N	N	N	N	N	N	N	N	N

questions	1	2	3	4	5	6	7	8	9
The entity does not consider the Principles material to its business $(Y/N)$							,		
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Y/ N) $$	ty is not at a stage where it is in a position to formulate and  Not Applicable								
The entity does not have the financial or/ human and technical resources available for the task $(Y/N)$	cal resources								
It is planned to be done in the next financial year (Y/ N)									
Any other reason									



#### **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 FY 2024-25:

Segment	Total number of training and awareness programmes heldw	Topics/ principles covered under the training and its impact	% age of persons in respective category covered by The awareness programmes
Board of Directors (BoDs)			100%
		These programs enhance Board effectiveness by strengthening regulatory awareness, strategic insight, and governance oversight—supporting informed and responsible decision-making.	
Key Managerial Personnel (KMPs)	12	A diverse range of training and awareness sessions were conducted for employees, covering critical	100%
Employees other than BoDs & KMPs		business, technical, regulatory, and personal development topics.  These included:  - Importance of year-end activities for financial closure and the financial position of the Omaxe	100%
		Group  - Employee benefits policies such as Mediclaim, GPA, Provident Fund, and ESIC  - Technical sessions on structure, quality, construction, and waterproofing technologies	
		<ul> <li>Design and construction coordination practices</li> <li>Regulatory compliance, including SEBI Regulation 30 and handling of UPSI</li> </ul>	
		<ul> <li>Awareness on women's health, particularly PCOS</li> <li>Professional development sessions on using LinkedIn as a career advancement tool</li> </ul>	
		These initiatives enhanced employee awareness, strengthened compliance and financial preparedness, promoted health and well-being, and supported professional growth—contributing to a more informed, engaged, and capable workforce.	

Segment	Total number of training and awareness programmes heldw	Topics/ principles covered under the training and its impact	% age of persons in respective category covered by The awareness programmes
Workers	5	Training sessions were conducted on key topics such as Structural Integrity, Quality and Construction Practices, Construction & Design Coordination, Current Technologies in Waterproofing, Labour Laws, and PCOS Awareness to support women's health.  These programs enhanced technical knowledge, promoted compliance with labour regulations, encouraged better coordination across design and construction teams, and fostered a culture of health awareness and inclusivity—contributing to improved project execution, employee well-being, and workplace equity.	100%

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 FY, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and as disclosed on the entity's website):

	Monetary										
Category	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Y/N)						
Penalty/ Fine	P1	Securities and Exchange Board of India	A total penalty of Rs. 47 lakh was imposed on the Company, its Directors, and KMPs, including former Directors and KMPs.	SEBI vide its Order Reference No. QJA/GR/ CFID/CFID/30598/2024-25 dated July 30, 2024 under Sections 11 (1), 11 (4), 11 (4A), 118(1) and 118(2) of the SEBI Act and Rule 5 of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 has, inter-alia, taken the actions against the listed entity, its Chairman and others in the matter of alleged mis- statements/irregularities in financial statements of the Company for FY 2018-19, 2019-20, and 2020-21. The copy of order is available at official website of SEBI under https://www.sebi.gov. in/enforcement.html.	The Company filed an appeal on September 12, 2024, before the Hon'ble SAT, Mumbai, challenging SEBI's Order dated July 30, 2024. SAT granted a stay on October 1, 2024, on the directions restraining Noticees No. 1 to 6 from the securities market and Noticees No. 5 and 6 from holding Director/KMP positions, subject to penalty payment. The penalties have been deposited, the matter is currently sub-judice, and Noticees No. 2 and 3 remain eligible to serve as Directors in Omaxe Limited.						
Settlement	NIL	-	NIL								
Compounding fee	NIL	-	NIL								



		Noi	n-Monetary	
Category	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Y/ N)
Imprisonment	NIL	-	Not applicable	
Punishment	P1	Securities and Exchange Board of India	SEBI vide its Order Reference No. QJA/GR/CFID/ CFID/30598/2024-25 dated July 30, 2024 under Sections 11 (1), 11 (4), 11 (4A), 118(1) and 118(2) of the SEBI Act and Rule 5 of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 has, inter-alia, taken the actions against the listed entity, its Chairman and others in the matter of alleged mis-statements/irregularities in financial statements of the Company for FY 2018-19, 2019- 20, and 2020-21. The copy of order is available at official website of SEBI under https:// www.sebi.gov.in/enforcement. html.	The Company filed an appeal on September 12, 2024, before the Hon'ble SAT, Mumbai, challenging SEBI's Order dated July 30, 2024. SAT granted a stay on October 1, 2024, on the directions restraining Noticees No. 1 to 6 from the securities market and Noticees No. 5 and 6 from holding Director/KMP positions, subject to penalty payment. The penalties have been deposited, the matter is currently sub-judice, and Noticees No. 2 and 3 remain eligible to serve as Directors in Omaxe Limited.

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

Case Details	Name of regulatory/ enforcement agencies/ judicial institutions
The Company filed an appeal on September 12, 2024, before the Hon'ble SAT, Mumbai, challenging SEBI's Order dated July 30, 2024. SAT granted a stay on October 1, 2024, on the directions restraining Noticees No. 1 to 6 from the securities market and Noticees No. 5 and 6 from holding Director/KMP positions, subject to penalty payment. The penalties have been deposited, the matter is currently sub-judice, and Noticees No. 2 and 3 remain eligible to serve as Directors in Omaxe Limited.	Securities Appellate Tribunal
The Company filed an appeal on September 12, 2024, before the Hon'ble SAT, Mumbai, challenging SEBI's Order dated July 30, 2024. SAT granted a stay on October 1, 2024, on the directions restraining Noticees No. 1 to 6 from the securities market and Noticees No. 5 and 6 from holding Director/KMP positions, subject to penalty payment. The penalties have been deposited, the matter is currently sub-judice, and Noticees No. 2 and 3 remain eligible to serve as Directors in Omaxe Limited.	Securities Appellate Tribunal

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

Yes, Omaxe has an Anti-Corruption and Anti-Bribery Policy as part of its Code of Conduct. The policy is applicable to all employees and Board of Directors of the Omaxe, including its subsidiaries, associates and Joint Venture Companies.

As per the policy guidelines, Omaxe has zero tolerance towards any form of bribery and corruption. Omaxe, its Directors and employees are expected to be aware of and follow all applicable anti-corruption and anti-bribery laws wherever Omaxe does business. They are prohibited to receive, offer or make directly/ indirectly any illegal payments, gifts, donations or benefits which are intended to obtain business or unethical favours. All Directors and employees at Omaxe are provided with training on the Code of Conduct, including anti-corruption and anti-bribery guidelines. Furthermore, all Directors and the Senior Management personnel of the Company are required to submit annual compliance declaration, to acknowledge their understanding and affirm compliance to the defined guidelines.

Omaxe has established a Whistle Blower mechanism that allows employees, Directors and third parties to report any unethical business practices, including complaints related to bribery and corruption, to the Whistle Blower Committee or to the Chairman of Audit Committee, for undertaking suitable corrective actions. The said policies are available at https://www.omaxe.com/investor/other-codes-policies.

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
Directors	NIL	. NIL
KMPs	NIL	NIL
Employees	NIL	. NIL
Workers	NIL	NIL

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

	FY 202	24-25	FY 2023-24		
	Number	Remarks	Number	Remarks	
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	-	Nil	-	
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	-	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, as there were no such cases reported.

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

Particular	FY 2024-25	FY 2023-24
Number of days of accounts payables	232	224

<sup>\*</sup> Number of Days of Account payable is calculated except amount payable against Govt. dues

#### 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:

Parameters	Metrics	FY 2024-25	FY 2023-24
Concentration of Purchase	a. Purchase from trading houses as % of total purchases	Nil	Nil
	b. Number of trading houses where purchases are made from	Nil	Nil
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	Nil	Nil
Concentration	a. Sales to dealers / distributors as % of total sales	Nil	Nil
of Sales	b. Number of dealers / distributors to whom sales are made	Nil	Nil
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	Nil	Nil
Share of RPTs in	<ul> <li>a. Purchases (Purchases with related parties / Total Purchases)</li> </ul>	4.16%	20.21%
	b. Sales (Sales to related parties / Total Sales)	1.30%	1.03%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	85.84%	83.26%
	d. Investments (Investments in related parties / Total Investments made)	96.34%	96.72%

#### Leadership Indicators

1. Awareness programmes conducted for value chain partners on any of the Principles during the FY:

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
-	-	-

In the Company's Supplier code of Conduct and general terms and conditions, the Company has emphasized on all integrity aspects which are applicable to all suppliers.

# 2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Y/ N). If yes, provide details of the same.

Yes, Omaxe has put in place stringent procedures to avoid/ manage any conflicts of interest involving members of the Board and other employees. Company's Code of Conduct provides guidelines for preventing and addressing any conflicts of interest. As per the guidelines, Directors are required to disclose any potential conflicts of interests to the Board of Directors or any Committee thereof and abstain from participating in the decision-making, voting or in influencing the decision on the areas resulting in potential conflict of interest.

Further, Omaxe's Policy on Related Party Transactions & its materiality lays down the procedures to be followed for identification, approval and disclosure of all transactions between the Company and related parties. The Policy prohibits any Director who may have a potential conflict of interest in any Related Party Transaction, to participate in discussions or vote on such transactions.

#### 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.

As a real estate company, research and development investments are not applicable to us. The Company is committed to undertaking investments that prioritizes and enhances our sustainability objectives and business practices. This will involve a detailed assessment of current operations, environmental and social impacts as well as identification of opportunities and of improvement. The Company remains committed to making focused investments in sustainable technologies and practices that drive value creation for all stakeholders and enable a positive impact on the society and planet.

2. a. Does the entity have procedures in place for sustainable sourcing? (Y/N).

Yes, OMAXE's Supplier Code of Conduct and the ESG criteria verified at site ensures that sustainability is integrated into its supply chain.

b. If yes, what percentage of inputs were sourced sustainably?

Presently, OMAXE has not carried out any assessment of the percentage of inputs which were sourced sustainably.

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.

Omaxe is engaged in the business of real estate development, including construction, operation and maintenance of real estate properties. OMAXE is not involved in reuse or recycling of the developed products. However, Omaxe has processes in place to ensure that waste generated within the projects during operation and maintenance of buildings is recycled, reused or treated as per the applicable regulatory requirements. All non-hazardous solid waste such as paper, plastic and metal scrap are recycled through authorized recyclers.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Y/N). 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.

No. The EPR is not applicable to Company's activities, as the Company is engaged in the business of real estate development. However, Omaxe has processes in place to ensure that waste generated within its projects, during construction and operation and maintenance of buildings, is responsibly recycled, reused, or treated as per regulatory requirements.



## **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?

Pro	lame of % of total Product/ Turnover Service contributed	Boundary for which the Life Cycle Perspective/ Assessment was conducted	Whether conducted by independent external agency (Y/ N)	Results communicated in public domain (Y/ N) If yes, provide the web-link.
-----	--	--	---	---

The Company has not undertaken any Lifecycle Perspective/Assessments for 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.

Name of Product/ Service	Description of the risk/ concern	Action Taken
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		
•	Not Applicable Not Appli			

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

Material		FY 2024-25		FY 2023-24				
	Reused	Recycled	Safely Disposed	Reused	Recycled	Safely Disposed		
Plastics (including packaging)		Not Applicable			Not Applicable			
E-waste								
Hazardous waste								
Other waste								

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

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

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:

			% of (	employe	es covere	ed by					
Category	Total (A)			Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		No. (B)	% (B/ A)	No. (C)	% (C/ A)	No. (D)	% (D/ A)	No. (E)	%(E/ A)	No. (F)	% (F/ A)
			Per	manent	employe	es					
Male	439	439	100%	439	100%	0	0	439	100%	0	0
Female	45	45	100%	45	100%	45	100%	0	0	0	0
Total	484	484	100%	484	100%	45	100%	439	100%	0	0
			Other th	an Perm	anent em	ployees					
Male	7	0	0	0	0	0	0	0	0	0	0
Female	1	0	0	0	0	0	0	0	0	0	0
Total	8	0	0	0	0	0	0	0	0	0	0

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

			% o	f worker	s covere	d by					
Category			Accident Maternit insurance benefits		Maternity Paterr benefits benefi		•	Day Care facilities			
		No. (B)	% (B/ A)	No. (C)	% (C/ A)	No. (D)	% (D/ A)	No. (E)	% (E/ A)	No. (F)	% (F/ A)
			Po	ermanen	t worke	rs					
Male	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0
			Other t	han Pern	nanent w	orkers					
Male	323	0	0	0	0	0	0	323	100%	0	0
Female	81	0	0	0	0	81	100%	0	0	81	100%
Total	404	0	0	0	0	81	100%	323	100%	81	100%



# 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
Cost incurred on well- being measures as a % of total revenue of the	0.46%	0.07%
Company		

#### 2. Details of retirement benefits, for Current FY and Previous FY.

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 employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/ N/ N.A.)
PF	42.35%	100%	Y	39.13%	100%	Y
Gratuity	100%	100%	NA	100%	100%	NA
ESI	5.16%	0	Υ	7.90%	0	Y
Others – please specify	0	0	0	0	0	0

#### 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.

Yes, most of the premises/offices of the Company are accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016. However certain old office buildings are not fully equipped with such facilities, though the Company's endeavor on all existing offices and new offices is to provide such facility, to the extent possible.

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.

Yes, a section of HR manual defines the equal opportunity policy of the company, i.e. Omaxe considers its staff it's most important assets and devotes considerable resources towards ensuring their well-being and the establishment of a productive environment. Omaxe is an 'equal opportunity employer' that is committed to hiring staff regardless of gender, race, creed, marital status, or national origin. Omaxe actively strives to attract, retain and develop staff of the highest quality. The Company will strive to provide a fair and equitable treatment to its staff, encourage opportunities for personal growth, discourage all forms of discrimination, provide a safe and well-equipped environment and most importantly, provide opportunity for staff participation in matters that affect the staff and their work.

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	100%	100%	There are no	permanent	
Female	100%	100%	workers.		
Total	100%	100%			

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

	Y/ N (If Yes, then give details of the mechanism in brief)
Permanent Workers	This is not applicable as the Company does not have any permanent workers.
Other than Permanent Workers	Employees and Workers can raise their grievances with their superiors or
Permanent Employees	HR Managers. They can raise their feedback or file complaints on the HR
Other than Permanent Employees	helpline facility. Our whistle blower policy enables employees/workers to communicate their concerns about unethical practices by writing an e-mail.

7. Membership of employees and worker in association(s) or Union(s) recognized 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(s) (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(s) (D)	% (D/C)	
Total Permanent Employees	Employees a	nd Workers are a	llowed to	associate with any trade union or seek			
Male							
Female	collective bargaining agreements. As on March 31, 2025, no employees were part of any independent trade union or collective bargaining agreements.			collective bargaining agreements. As			
Total Permanent Workers							
Male							
Female		J. J				-	

8. Details of training given to employees and workers:

Category		F	Y 2024-25	5			F	Y 2023-24	•	
	Total (A)	On Hea Safety m	lth and easures	On S upgra		Total (D)	On Hea Safety m		On S upgra	
		No. (B)	% (B/ A)	No (C)	% (C/A)		No. (E)	% (E/ D)	No. (F)	% (F/ D)
Employees										
Male	446	446	100%	446	100%	463	463	100%	463	100%
Female	46	46	100%	46	100%	48	48	100%	48	100%
Total	492	492	100%	492	100%	511	511	100%	511	100%
Workers										
Male	323	323	100%	323	100%	338	338	100%	338	100%
Female	81	81	100%	81	100%	71	71	100%	71	100%
Total	404	404	100%	404	100%	409	409	100%	409	100%



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

Category	FY 2024-25 FY 2023			Y 2023-24		
	Total (A)	No. (B)	% (B/ A)	Total (C)	No. (D)	% (D/C)
E	mployees					
Male	446	446	100%	463	463	100%
Female	46	46	100%	48	48	100%
Total	492	492	100%	511	511	100%
•	Workers					
Male	323	323	100%	338	338	100%
Female	81	81	100%	71	71	100%
Total	404	404	100%	409	409	100%

#### 10. Health and safety management system:

# a. Whether an occupational health and safety management system has been implemented by the entity? (Y/N). If yes, the coverage of such system?

Yes, Omaxe has implemented an occupational health and safety management system. It covers the entire business including project sites, managed assets (operational premises) and the hospitality division.

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

Omaxe staying up-to-date to control risks and adapting to modern demands is one idea we are adhering to for risk control that can keep workplace safety measures in place. Two different sorts of monitoring techniques are used by Omaxe to inspect the workplace. One is active monitoring, which help us to keep track of how management arrangements are created, developed, installed and used. We regularly audit our facilities, including our offices and projects. We do routine health surveillance to spot risks and get rid of those that are bad for health. Omaxe takes a systematic and coordinated approach to managing workplace risks. We use risk assessment to identify and eliminate risks and we prefer hierarchy to prioritize measures to combat risks. We also use engineering controls and collective measures to minimize risks.

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

Yes, OMAXE has a well-defined Standard Operating Procedure (SOP) for incident reporting, classification and investigation for any incidents related to health and safety.

#### d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Y/N).

Yes, OMAXE provides access to non-occupational medical and healthcare services to employees, such as:

- 1. Every project is equipped with emergency handling equipment and first-aid to handle any occupational or non-occupational injuries and illnesses;
- 2. Trainings are organized periodically through HR facilitations on promoting good health and well-being;
- 3. All employees are covered under health insurance.

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

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

<sup>\*</sup>Including in the contract workforces

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

OMAXE upholds health, safety and security as a core value in the conduct of its business and is committed to creating a zero-harm workplace i.e. zero lost-time injuries or fatalities, each year. Measures to ensure a safe and healthy workplace include periodic health surveillance, trainings for management, employees and contractors, and periodic review by senior management.

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

		FY 2024-25			FY 2023-24	
	Filed during the year	resolution			Pending resolution at the end of year	Remarks
Working Conditions	0	0	-	0	0	-
Health & Safety	0	0	-	0	0	-

#### 14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	Nil
Working Conditions	Nil

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.

Not Applicable.

#### **Leadership Indicators**

1. Does the entity extend any life insurance or any compensatory package in the event of death of

## (A) Employees (Y/N) (B) Workers (Y/N)?

(A) Employees: Employees are covered in Group Accidental Insurance in case of accident only.

(B) Workers: NIL



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

Company adheres by all the statutory compliance as applicable under various Statutory Laws and same is applicable to the Value chain partners as well. The records are verified based on the periodic audit process within the audit team.

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 are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

Safety Incident/ Number	Total no. of affec worl		No. of employees/workers tha rehabilitated and placed in suit employment or whose fami members have been placed in su employment		
	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)	
Employees	0	0	0	0	
Workers	0	0	0	0	

4. Does the entity provide transition assistance programmes to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Y/N).

Νo

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	NIL
Working Conditions	NIL

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.

Not Applicable

#### PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

#### **Essential Indicators**

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

The company evaluates and classifies relevant stakeholders based on inclusivity, materiality, responsiveness, impact, interests, and expertise on important matters, level of influence, integrity, willingness, and expectations. Our stakeholder groups are directly or indirectly affected by the company or have the ability to influence value creation in the short, medium, or long term. The company has identified its stakeholders and maintains regular and effective communication with them. Key categories of stakeholders include customers, vendors, suppliers, employees, shareholders, investors, government and regulatory authorities, and the wider community. The company has established effective systems to address grievances for customers, employees, and shareholders. Furthermore, the company undertakes special initiatives to engage with marginalized stakeholders as part of its corporate social responsibility efforts.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Y/N)	Channels of communication (E-mail, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others)	Purpose and scope of engagement including key Topics and Concerns raised during such engagement
Customers	No	<ul> <li>E-mails</li> <li>Direct customer calls</li> <li>Advertisements</li> <li>Press calls through empaneled channel partners</li> <li>Customer satisfaction surveys</li> <li>Website</li> </ul>	Ongoing	<ul> <li>Product launch awareness;</li> <li>Customer service delivery;</li> <li>Identifying opportunities to improve our products &amp; services</li> <li>Seeking customer feedback;</li> <li>Understanding customer requirements and</li> <li>Customer query and complaint resolution.</li> </ul>
Investors and Shareholders	No	<ul> <li>Annual General Meetings</li> <li>Periodic disclosures including Quarterly Financial Results</li> <li>Press releases and newsletters</li> <li>Annual report</li> <li>Corporate Announcements uploaded on Stock Exchanges Websites and Company's Website</li> </ul>	Ongoing	<ul> <li>Economic performance and growth;</li> <li>Shareholders awareness on business developments;</li> <li>Key risks related to the Company such as competition and market risk;</li> <li>Focus on strong operating and financial performance; and</li> <li>Ensuring regulatory compliance.</li> </ul>
Suppliers and Contractors	No	<ul> <li>E-mails</li> <li>Phone calls</li> <li>Meetings</li> <li>One-on-one meetings</li> </ul>	Others – depending on the project requirements	<ul> <li>Timely delivery of material and work completion;</li> <li>Enhancing the deployment of resources and manpower;</li> <li>Timely payment issues (if any);</li> <li>Ensuring quality &amp; and meeting project schedules</li> <li>Issuing of contract amendments (if any);</li> <li>Ensuring regulatory compliance.</li> </ul>
Employees	No	<ul> <li>Employee newsletters</li> <li>Intranet portal</li> <li>E-mail and other written communication</li> <li>Performance review meetings</li> <li>Various functional committee meetings</li> <li>Cultural events</li> <li>Off-sites</li> <li>Skip Meetings</li> </ul>	Ongoing	<ul> <li>Keep employees updated on organizational goals, vision, mission and objectives and also align with the business plans;</li> <li>Learning and development;</li> <li>Career advancement opportunities;</li> <li>Health and safety;</li> <li>Transparent communication and grievance redressal;</li> <li>Performance evaluation; and</li> <li>Rewards and Recognition.</li> <li>Ensuring regulatory compliance.</li> </ul>



Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Y/N)	Channels of communication (E-mail, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others)	Purpose and scope of engagement including key Topics and Concerns raised during such engagement
Regulatory Bodies	No	<ul> <li>Electronic and physical correspondence with regulatory bodies</li> <li>Face to face meetings</li> <li>Through industry chambers</li> <li>Annual Report</li> </ul>	Ongoing	<ul> <li>Regulatory compliance;</li> <li>Stock Exchange Intimations and</li> <li>Deliberations and inputs on regulations and policies that have bearing on OMAXE's operations and businesses.</li> </ul>
Communities	Yes	Direct engagement via field visits and community meetings undertaken by OMAXE Foundation.	Monthly	<ul><li>Need assessments;</li><li>Enabling sustainable livelihoods and</li><li>Programme Updates.</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.

Omaxe, periodically undertakes consultation with key internal and external stakeholders as part of the materiality assessment exercise. This is aimed at identifying and re-evaluating material economic, environmental and social topics relevant for its business. The process has been delegated by the Board to the management.

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.

Not Applicable

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

Not Applicable

## 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)	
Employees							
Permanent*	484	484	100%	505	505	100%	
Other than Permanent	8	8	100%	6	6	100%	
Total Employees	492	492	100%	511	511	100%	
		Worke	ers				
Permanent	0	0	0	0	0	0	
Other than Permanent	404	404	100%	409	409	100%	
Total Workers	404	404	100%	409	409	100%	

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

Category		FY 2024-25			FY 2023-24					
	Total (A)	Equa Minimu	al to m Wage	More Minimu		Total (D)	•	al to m Wage	More Minimu	
		No. (B)	% (B/ A)	No. (C)	% (C/ A)		No. (E)	% (E/ D)	No. (F)	% (F/ D)
				Employee	s					
Permanent	484	-	-	484	100%	505	-	-	505	100%
Male	439	-	-	439	100%	457	-	-	457	100%
Female	45	-	-	45	100%	48	-	-	48	100%
Other than Permanent	8	-	-	8	100%	6	-	-	6	100%
Male	7	-	-	7	100%	6	-	-	6	100%
Female	1	-	-	1	100%	0	-	-	0	0
				Workers						
Permanent	0	-	-	0	0	0	-	-	0	0
Male	0	-	-	0	0	0	-	-	0	0
Female	0	-	-	0	0	0	-	-	0	0
Other than Permanent	404	-	-	404	100%	409	-	_	409	100%
Male	323	-	-	323	100%	338	-	-	338	100%
Female	81	-	-	81	100%	71	-	-	71	100%



#### 3. Details of remuneration/salary/wages

#### a. Median remuneration/ wages:

Category		Male	Female		
	Number	Median remuneration/ salary/ wages of respective category (₹ in lakhs per annum)	Number	Median remuneration/ salary/ wages of respective category (₹ in lakhs per annum)	
Board of Directors (BoDs)	5	55	2	4.5	
Key Managerial Personnel (KMPs)	3	77	0	N.A.	
Employees other than BoDs and KMPs	439	6.30	45	6	
Workers	323	1.40	81	1.38	

Note: While calculating median remuneration of Board of Directors, Sitting Fees paid to Independent Directors was also considered.

#### 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 female as % of total wages	5.31%	6.55%

# 4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Y/ N).

Yes.

OMAXE has a formal mechanism that allows for reporting and remediation of all human rights related issues through its Whistle Blower Policy. This allows all stakeholders including employees, suppliers, customers and vendors to report any human right-related concerns. Through this mechanism, OMAXE provides the necessary safeguards to all complainants for making disclosures in good faith. In addition, OMAXE has an Internal Complaints Committee (ICC) that is responsible for addressing any incidents and complaints related to sexual harassment.

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

OMAXE has a formal mechanism that allows for reporting and remediation of all human rights related issues through its Whistle Blower Policy. This allows all stakeholders including employees, suppliers, customers and vendors to report any human right-related concerns. Through this mechanism, OMAXE provides the necessary safeguards to all complainants for making disclosures in good faith. In addition, OMAXE has an ICC that is responsible for addressing any incidents and complaints related to sexual harassment. All such incidents can be reported to the ICC as per the process defined in OMAXE's Policy on Prevention of Sexual Harassment.

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

Complaints	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	-	0	0	-
Discrimination at workplace	0	0	-	0	0	-
Child Labour	0	0	-	0	0	-
Forced Labour/ Involuntary Labour	0	0	-	0	0	-
Wages	0	0	-	0	0	-
Other Human Rights related issues	0	0	-	0	0	-

# 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 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.

Omaxe's Whistle Blower Policy allows employees, contractors and vendors to report any human rights related concerns or complaints without fear of retaliation. The policy provides necessary safeguards to all complainants for making disclosures in good faith, through specific guidelines to ensure the protection of the complainant:

- The identity of the complainant is kept confidential at all times, except during the course of any legal proceedings, where a disclosure/ statement is required to be filed to meet the specific requirement of Statutory Bodies;
- The Company, as a policy, strongly condemns any kind of discrimination, harassment or any other unfair employment
  practice being adopted against the complainant and full protection is granted to him/her against any reprisal including
  but not limited to:
- Unfair employment practices such as threat or intimidation of termination/ suspension of services;
- Disciplinary action including transfer, demotion, refusal of promotion; and
- Direct or indirect abuse of authority to obstruct the complainant's right to continue performance of his duties during routine daily operations.

#### 9. Do human rights requirements form part of your business agreements and contracts? (Y/ N).

Yes.

The terms of contract signed with the value chain partners (including suppliers, contractors, service providers and other business partners), includes human rights related requirements.

#### 10. Assessments for the year:

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

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

Not Applicable



#### **Leadership Indicators**

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

There have been no significant human rights related concerns or grievances. However, Omaxe has strengthened its procedures to address any potential human rights related risks in owned operations and in the value chain. The Company has a General Conditions of Contract/ Supplier Code of Conduct with human rights related guidelines for all value chain partners, (including suppliers, contractors, vendors, service providers and other business partners). Further, the critical suppliers including contractors engaged in construction of its portfolio, are evaluated on their employment practices, to prevent any potential human rights issues or violations in its supply chain.

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

Omaxe internally monitors compliances to all relevant laws and policies pertaining to human rights issues, across entire operations. 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? Most of the premises/ offices of Omaxe are accessible to differently abled individuals, as per the requirements of the Rights of Persons with Disabilities Act, 2016. OMAXE has thoroughly implemented various measures to ensure accessibility, safety and convenience for persons with disability in all of its new offices/ premises. Further, requisite steps are being undertaken in its existing offices/ premises to align with the requirements of the applicable regulatory provisions.

# 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?

Most of the premises/ offices of Omaxe are accessible to differently abled individuals, as per the requirements of the Rights of Persons with Disabilities Act, 2016. OMAXE has thoroughly implemented various measures to ensure accessibility, safety and convenience for persons with disability in all of its new offices/ premises. Further, requisite steps are being undertaken in its existing offices/ premises to align with the requirements of the applicable regulatory provisions.

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

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	NIL
Discrimination at workplace	NIL
Child Labour	NIL
Forced Labour/ Involuntary Labour	NIL
Wages	NIL
Others- please specify	NIL

# 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.

#### PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

#### **Essential Indicators**

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

Parameter	FY 2024-25	FY 2023-24
From renewable sources		
Total electricity consumption (A) [in Gigajoules (GJ)]	0	0
Total fuel consumption (B) (in GJ)	0	0
Energy consumption through other sources (C) (in GJ)	0	0
Total energy consumption from renewable sources (A+B+C) (in GJ)	0	0
From non-renewable source		
Total electricity consumption (D) (in GJ)	17,800.69	35,437.21
Total fuel consumption (E) (in GJ)	3,347.48	3,116.62
Energy consumption through other sources (F) (in GJ)	0	0
Total energy consumed from non-renewable sources (D+E+F) (in GJ)	21,148.17	38,553.83
Total energy consumed (A+B+C+D+E+F) (in GJ)	21,148.17	38,553.83
Energy intensity per rupee of turnover (Total energy consumed (Gj) / Revenue from operations)	0	0
Energy intensity per rupee turnover adjusted for Purchasing Power Parity (PPP)	0	0
(Total energy consumed (GJ) / Revenue from operations adjusted for PPP)*		
Energy intensity in terms of physical output (In GJ)	0	0
Energy intensity (optional)- the relevant metric may be selected be selected by the entity	0	0

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

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.

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

FY 2024-25	FY 2023-24
0	0
4,918.92	20,568.32
685.89	8,996.80
0	0
0	0
5,604.81	29,565.12
5,604.81	29,565.12
0	0
0	0
0	0
0	0
	0 4,918.92 685.89 0 0 <b>5,604.81</b> <b>5,604.81</b> 0

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



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

Parameter	FY 2024-25	FY 2023-24
Water discharge by destination and level of treatment [in kilolitres (KL)]		
(i) To Surface Water	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) To Groundwater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) To Seawater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third parties	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (KL)	0	0

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

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

Treated wastewater from our projects and factories are recycled for flushing and reused for irrigation purposes in the landscaped areas of the projects. Excess treated water is also being used for construction purposes, Avenue plantations.

# 6. 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	-	0	0
SOx	-	0	0
Particulate matter (PM)	-	0	0
Persistent organic pollutants (POP)	-	0	0
Volatile organic compounds (VOC)	-	0	0
Hazardous air pollutants (HAP)	-	0	0
Others – please specify	-	0	0

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: N.A.

# 7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) and 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 CO2, CH4, N20, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	N.A	N.A.
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	-	-
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	-	_	-
Total Scope 1 and Scope 2 emissions intensity per rupee of turnover adjusted	-	-	-
For Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	-	-	-
Total Scope 1 and Scope 2 emission intensity in terms of physical output	-	-	-
Total Scope 1 and Scope 2 emission intensity (optional)  - the relevant metric may be selected by the entity		-	-

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

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

The Company does not have a dedicated project related to reducing Green House Gas emissions.

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

Parameter	FY 2024-25	FY 2023-24
Total Waste generated (in metric tonnes)		
Plastic waste (A)	-	-
E-waste (B)	-	-
Bio-medical waste <i>(C)</i>	-	-
Construction and demolition waste (D)	-	-
Battery waste <i>(E)</i>	-	-
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any (G)		
Other Non-hazardous waste generated (H). Please specify, if any. (Break up by sector)	composition i.e. by ma	terials relevant to the
(i) Paper Waste	-	-
(ii) Scrap Metal	-	-
(iii) Organic Waste	-	-
(iv) Miscellaneous	-	-
Total (A+B+C+D+E+F+G+H)	-	-



Parameter	FY 2024-25	FY 2023-24
Waste intensity per rupee of turnover	-	-
(Total waste generated (MT) / Revenue from operations)		
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	-	-
(Total waste generated (MT) / Revenue from operations adjusted for PPP)		
Waste intensity in terms of physical output	-	-
Waste intensity (optional)- the relevant metric may be selected by the entity	-	-
For each category of waste generated, total waste recovered through recycl (in metric tonnes)	ing, re-using or other	recovery operations
Category of waste		
(i) Recycled	-	-
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
Total	-	-
For each category of waste generated, total waste disposed by nature of dis	sposal method (in me	tric tonnes)
(i) Incineration	-	-
(ii) Landfilling	-	-
(iii) Other disposal operations	-	-
Total	-	-

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

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.

The Company is engaged in the business of real estate and do not operate any factory and do not significantly use such materials. The Hazardous waste, if any, is handed over to authorized recyclers.

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, specify details in the following format:

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

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Y/ N)	Results communicated in public domain (Y/ N)	Relevant Web link
-	-	-	-	-	-

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

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

## **Leadership Indicators**

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

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

- (i) Name of the area: N.A.
- (ii) Nature of operations: N.A.
- (iii) Water withdrawal, consumption and discharge in the following format: N.A.

Parameter	FY 2024-25	FY 2023-24
Water withdrawal by source (in kilolitres)		-
(i) Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres)	-	-
Total volume of water consumption	_	
(in kilolitres)		
Water intensity per rupee of turnover	-	-
(Water consumed / turnover)	-	-
Water intensity (optional) - the	-	-
relevant metric may be selected by the entity		
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	-	-
- No treatment	-	-
- With treatment – please specify	-	
level of treatment	-	-
(ii) Into Groundwater	-	



Parameter	FY 2024-25	FY 2023-24	
- No treatment	-	-	
- With treatment – please specify	-	-	
level of treatment	-	-	
(iii) Into Seawater	-	-	
- No treatment	-	-	
- With treatment – please specify	-	-	
level of treatment	-	-	
(iv) Sent to third-parties	-	-	
- No treatment	-	-	
- With treatment – please specify	_		
level of treatment			
(v) Others	-	-	
- No treatment	-	-	
- With treatment - please specify	_	_	
level of treatment	-	-	
Total water discharged (in kilolitres)	-	-	

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

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

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N20, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 Equivalent	N.A	N.A
Total Scope 3 emissions		N.A	N.A
per rupee of turnover			
<b>Total Scope 3 emission intensity (Optional)-</b> the relevant metric may be selected by the entity		N.A	N.A

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: N.A.

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: N A

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, 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 (Web-link, if any, may be provided along-	Outcome of the
		with summary)	initiative
-	-	-	-

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

N.A

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?

N.A

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

N.A.

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.

Omaxe has affiliations with 5 trade and industry chambers/ associations, including national and state level associations. It constantly engages with these trade bodies to advocate sector specific policy reforms and improved transparency and governance. (Previous year data)

b. List the top 5 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/ National)
1	PHD Chamber of Commerce and Industry (PHDCCI)	National
2	CREDAI	State
3	Federation of Indian Chambers of Commerce and Industry (FICCI)	National
4	National Real Estate Development Council (NAREDCO)	State
5	The Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National

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

Name of authority	Brief of the case	Corrective action taken		
Not Applicable				



## **Leadership Indicators**

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

S. No.	Public policy advocated	Method resorted for such advocacy	available in public	Frequency of review by Board (Annually/ Half yearly/ Quarterly/ Others)	Web Link, if available

Not Applicable

#### PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

#### **Essential Indicators**

 Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current FY.

Name and brief details of project No.		Whether conducted by independent external agency (Y/ N)	Results communicated in public domain (Y/ N)	Relevant Web Link
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Not Applicable for this reporting period.

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

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

None of the Company's operations or units have resulted in community displacement. As a result, no project required Rehabilitation and Resettlement (R&R) in the reporting year.

4. Describe the mechanisms to receive and redress grievances of the community.

Omaxe engages with community members through its social arm - OMAXE Foundation. In addition, OMAXE is closely connected with community members through its various programmes. The respective programme team engages with the community stakeholders to receive and redress concerns of the communities.

5. 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	33%	33%
Directly from within India	100%	100%

6. 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	-	-
Semi-urban	-	-
Urban	-	-
Metropolitan	-	-

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

\*We are in the process of re-evaluating our existing Sustainability Standards and setting the goals and targets in line with NGBRC/GRI framework.

#### **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):

Details of negative social impact identified	Corrective action taken
N.A.	N.A.

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

S. No.	State	Aspirational District	Amount spent (In INR)
N.A.	N.A.	N.A.	N.A.

- 3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/vulnerable groups? (Y/N).
  - (b) From which marginalized/vulnerable groups do you procure?
  - (c) What percentage of total procurement (by value) does it constitute?
- 4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current FY), based on traditional knowledge:

Intellectual Property based on traditional knowledge	Owned/ Acquired (Y/ N)	Benefit shared (Y/N)	Basis of calculating benefit share		
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.

Name of authority	Brief of the Case	Corrective action taken		
Not Applicable				

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project		% of beneficiaries from vulnerable and marginalized groups			
Not Applicable						



# 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.

Customer feedback, questions and complaints are handled in a transparent and timely manner. A dedicated team of qualified Customer Relationship Management (CRM) personnel have been appointed to address each complaint. This mechanism is communicated via the contact no. / e-mail through the very first letter of correspondence with a newly on-boarded customer.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	N.A.
Safe and responsible usage	N.A.
Recycling and/ or safe disposal	N.A.

#### 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	Nil	Nil	-	Nil	Nil	-
Advertising	Nil	Nil	-	Nil	Nil	-
Cyber-security	Nil	Nil	-	Nil	Nil	-
Delivery of essential services	Nil	Nil	-	Nil	Nil	-
Restrictive Trade Practices	Nil	Nil	-	Nil	Nil	-
Unfair Trade Practices	Nil	Nil	-	Nil	Nil	-
Other	Nil	Nil	-	Nil	Nil	-

#### 4 Details of instances of product recalls on account of safety issues:

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

Due to nature of business of OMAXE, product recalls on account of safety issues is not applicable.

# 5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Y/N). If available, provide a web-link of the policy.

Yes, OMAXE has an Information Security Policy supported by management procedures that are aimed at achieving and sustaining enterprise-level information security objectives. Ensuring security of information, like any other business asset, is one of the key priorities in the business processes, to prevent any theft, tampering, misuse and unauthorized access. OMAXE constantly deploys appropriate technology, processes, resources and infrastructure for timely implementation of

security controls that comply with applicable laws and incorporate leading industry practices.

The Company has established procedures to ensure data privacy of its customers, employees and other stakeholders. It only collects customer information which is essential for the purpose of providing the product or service. The collected data is protected through regular security upgrades and adequate employee training is provided to ensure safeguarding of sensitive information.

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.

Not Applicable.

- 7. Provide the following information relating to data breaches:
  - a. Number of instances of data breaches: NIL
  - b. Percentage of data breaches involving personally identifiable information of customers: NIL
  - c. Impact, if any, of the data breaches: NA

#### **Leadership Indicators**

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

Details of all the products and services are provided on the Company's website at https://www.omaxe.com

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

Consumers are informed about the safe and responsible usage of OMAXE's buildings through various measures undertaken at the time of building handover, as well as during operation and maintenance.

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

Any risk of disruption/ discontinuation of essential services is timely communicated to customers occupying the leased properties, through e-mail communication by the CRM Teams.

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

Yes, the entity displays the information about the product and its various features within the product. The Company is bound by RERA however the product brochures also inform the customer about the sustainability features and the related customer benefits. Provision of signage within the product also guides the customers to identify the features and its usage. Customer satisfaction is ensured by having continuous engagement right from the day of possession till society handover, timely response to their grievances and prompt service support. We do take feedback from our customers through customer surveys in which we request the customer to share feedback about their experience of the product, their journey throughout the possession of their flat, etc. These feedbacks provide an opportunity to us to understand the customer pain points and liking of the sustainability and other.

