Business Responsibility and Sustainability Reporting

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

	•	
GD G	Questions	Responses
1.	Corporate Identity Number (CIN) of the Listed Entity	L45200MH1995PLC094208
2.	Name of the Listed Entity	Keystone Realtors Limited
3.	Year of incorporation	1995
4.	Registered office address	702 - Natraj, M. V. Road Junction, Western Express Highway, Andheri East, Mumbai - 400069
5.	Corporate address	702 - Natraj, M. V. Road Junction, Western Express Highway, Andheri East, Mumbai - 400069
6.	E-mail	<u>cs@rustomjee.com</u>
7.	Telephone	912266766888
8.	Website	www.rustomjee.com
9.	Financial year for which reporting is being done	01/04/2024 - 31/03/2025
10.	Name of the Stock Exchange(s) where shares are listed	BSE, NSE
11.	Paid-up Capital	₹ 1,26,02,63,230
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Bimal Nanda cs@rustomjee.com 022-66766888
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).	Consolidated
14.	Name of assurance provider/assessor	NA
15.	Type of assurance/assessment obtained	Not Applicable

II. Products/services

16. Details of business activities (accounting for 90% of the turnover)

Sr. no.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity	
1.	Real Estate	Construction	100%	

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

Sr. no.	Product/Service	NIC Code	% of total Turnover contributed
1.	Residential and Commercial Buildings	68	100%

III. Operations

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

	Number of plants	Number of offices	Total
National	0	3	3
International	0	0	0

19. Markets served by the entity

a. Number of locations

Locations	Number
National (No. of States)	1
International (No. of Countries)	0

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

c. A brief on types of customers

At Rustomjee Group, we take pride in serving customers from various segments, catering to all price points, as they search for their dream homes. We understand that each customer has unique preferences and requirements, so we offer a diverse range of properties to meet their needs. Whether our clients are first-time homebuyers looking for affordable options, families seeking spacious homes in family-friendly neighborhoods, or individuals interested in luxurious properties with exclusive amenities, we have something for everyone.

Our comprehensive portfolio ensures that every customer, regardless of budget, can find a home that matches their desires. We recognize that different segments of the market have different expectations, and we diligently tailor our offerings to meet those demands. From competitively priced homes that offer excellent value for money to high-end residences featuring exquisite craftsmanship and lavish amenities, we strive to exceed our customers' expectations and deliver unparalleled satisfaction.

IV. Employees

20. Details as at the end of financial year

a. Employees & Workers - (including differently abled)

Sr.	Particulars	Total	M	ale	Fer	Female	
No.		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)	
		E	MPLOYEES				
1.	Permanent (D)	1,110	874	78.74 %	236	21.27 %	
2.	Other than Permanent (E)	697	487	69.88 %	210	30.13 %	
3.	Total employees (D + E)	1,807	1,361	75.32 %	446	24.69 %	
			WORKERS				
4.	Permanent (F)	0	0	0%	Ο	0%	
5.	Other than Permanent (G)	0	0	0%	0	0%	
6.	Total employees (F + G)	0	0	0%	0	0%	

b. Differently abled Employees & Workers

Sr.	Particulars	Total	M	ale	Female		
No.		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)	
		DIFFEREN	NTLY ABLED EM	PLOYEES			
1.	Permanent (D)	2	2	100%	0	0%	
2.	Other than Permanent (E)	O	0	0%	0	0%	
3.	Total employees (D + E)	2	2	100%	0	0%	
		DIFFERE	NTLY ABLED W	ORKERS			
4.	Permanent (F)	O	0	0%	0	0%	
5.	Other than Permanent (G)	0	0	0%	0	0%	
6.	Total employees (F + G)	0	0	0%	0	0%	

21. Participation/Inclusion/Representation of women

	Total (A)	No. of females (B)	% of females (B/A)
Board of Directors	6	1	16.67%
Key Management Personnel	2	0	0%

22. Turnover rate for permanent employees and workers

	2024-25			2023-24			2023-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	12.90 %	17.62 %	13.90 %	10.61 %	18.70 %	12.35 %	17.73 %	16.46%	17.45%
Permanent Workers	0%	0%	0%	0%	0%	0%	0%	0%	0%

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

23. Names of holding/subsidiary/associate companies/joint ventures

Sr. 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:
1	Amaze Builders Private Limited	Subsidiary	100.00%	Yes
2	Credence Property Development Private Limited	Subsidiary	100.00%	Yes
3	Dynasty Infrabuilders Private Limited	Subsidiary	100.00%	Yes
4	Enticier Realtors Private Limited	Subsidiary	100.00%	Yes
5	Ferrum Realtors Private Limited	Subsidiary	100.00%	Yes
6	Flagranti Realtors Private Limited	Subsidiary	100.00%	Yes
7	Imperial Infradevelopers Private Limited	Subsidiary	100.00%	Yes
8	Intact Builders Private Limited	Subsidiary	100.00%	Yes
9	Key Galaxy Realtors Private Limited	Subsidiary	100.00%	Yes
10	Key Green Realtors Private Limited	Subsidiary	100.00%	Yes
11	Key Interiors Realtors Private Limited	Subsidiary	100.00%	Yes
12	Keyace Realtors Private Limited	Subsidiary	100.00%	Yes
13	Keyaqua Realtors Private Limited	Subsidiary	100.00%	Yes
14	Keybestow Realtors Private Limited	Subsidiary	100.00%	Yes
15	Keyblue Realtors Private Limited	Subsidiary	100.00%	Yes
16	Keybloom Realtors Private Limited	Subsidiary	100.00%	Yes
17	Keyearth Realtors Private Limited	Subsidiary	100.00%	Yes
18	Keyedge Realtors Private Limited	Subsidiary	100.00%	Yes
19	Keyelite Realtors Private Limited	Subsidiary	100.00%	Yes
20	Keyestella Realtors Private Limited	Subsidiary	100.00%	Yes
21	Keyevita Realtors Private Limited	Subsidiary	100.00%	Yes
22	Keyfionna Realtors Private Limited	Subsidiary	100.00%	Yes
23	Keymajestic Realtors Private Limited	Subsidiary	100.00%	Yes
24	Keymarrisa Realtors Private Limited	Subsidiary	100.00%	Yes
25	Keymarvel Realtors Private Limited	Subsidiary	100.00%	Yes
26	Keymontana Realtors Private Limited	Subsidiary	100.00%	Yes
27	Keyolivia Realtors Private Limited	Subsidiary	100.00%	Yes
28	Keypalm Realtors Private Limited	Subsidiary	100.00%	Yes
29	Keyshelter Realtors Private Limited	Subsidiary	100.00%	Yes
30	Keysky Realtors Private Limited	Subsidiary	100.00%	Yes
31	Keysteps Realtors Private Limited	Subsidiary	100.00%	Yes
32	Keystone Infrastructure Private Limited	Subsidiary	100.00%	Yes
33	Mirabile Realtors Private Limited	Subsidiary	100.00%	Yes
34	Navabhyudaya Nagar Development Private Limited	Subsidiary	100.00%	Yes
35	Oceanhomes Realtors Private Limited	Subsidiary	100.00%	Yes
36	Real Gem Buildtech Private Limited	Subsidiary	100.00%	Yes

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

Sr. 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?
37	Riverstone Educational Academy Private Limited	Subsidiary	100.00%	Yes
38	Ronstone Realtors Private Limited	Subsidiary	100.00%	Yes
39	Rustomjee Realty Private Limited	Subsidiary	100.00%	Yes
40	Rustomjee Seaview Realtors Private Limited	Subsidiary	100.00%	Yes
41	Xcellent Realty Private Limited	Subsidiary	100.00%	Yes
42	Rebus Realtors LLP	Subsidiary	99.99%	Yes
43	Kapstar Realty LLP	Subsidiary	99.00%	Yes
44	Keyheights Realtors Private Limited	Subsidiary	90.10%	Yes
45	Keymeadows Realtors Private Limited	Subsidiary	90.10%	Yes
46	Keyorbit Realtors Private Limited	Subsidiary	90.10%	Yes
47	Keyspace Realtors Private Limited	Subsidiary	90.10%	Yes
48	Keyvihar Realtors Private Limited	Subsidiary	90.10%	Yes
49	Mt K Kapital Private Limited	Subsidiary	84.00%	Yes
50	Premium Build Tech LLP	Subsidiary	75.00%	Yes
51	Firestone Developers Private Limited	Subsidiary	73.00%	Yes
52	Nouveau Developers Private Limited	Subsidiary	73.00%	Yes
53	Luceat Realtors Private Limited	Subsidiary	58.00%	Yes
54	Crest Property Solutions Private Limited	Subsidiary	51.00%	Yes
55	Kapstone Constructions Private Limited	Joint Venture	51.00%	Yes
56	Keymont Realtors Private Limited	Subsidiary	51.00%	Yes
57	Redgum Realtors Private Ltd	Joint Venture	51.00%	Yes
58	Rostia Realtors Private Limited	Joint Venture	51.00%	Yes
59	Ajmera Luxe Realty Private Limited	Joint Venture	50.00%	Yes
60	Jyotirling Constructions Private Limited	Joint Venture	50.00%	Yes
61	Megacorp Constructions LLP	Associate	50.00%	Yes
62	Krishika Developers Private Limited	Associate	36.50%	Yes

VI. CSR Details

24

(i) Whether CSR is applicable as per section 135 of Companies Act, 2013:

Yes

(ii) Turnover (in ₹)

₹ 5,50,63,00,000

(iii) Net worth (in ₹)

₹ 25,33,54,00,000

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:

Stakeholder	Grievance Redressal Mechanism in Place	edressal provide echanism web-link for	2024-25			2023-24		
group from whom complaint is received			Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	https://www. rustomjee. com/about- us/codes- and-policies/	0	0	NA	0	0	NA

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

Stakeholder	Grievance	If Yes, then provide		2024-25			2023-24	
group from whom complaint is received	Redressal Mechanism in Place	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
Investors (other than shareholders)	Yes	https://www. rustomjee. com/about- us/codes- and-policies/	0	0	NA	0	0	NA
Shareholders	Yes	https://www. rustomjee. com/about- us/codes- and-policies/	0	0	NA	0	0	NA
Employees and workers	Yes	https://www. rustomjee. com/about- us/codes- and-policies/	0	0	NA	0	0	NA
Customers	Yes	https://www. rustomjee. com/about- us/codes- and-policies/	11	8		11	8	
Value Chain Partners	Yes	https://www. rustomjee. com/about- us/codes- and-policies/	0	0	NA	0	0	NA

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

Sr. No.	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
1.	Environmental norms/ legislations	Risk	New laws related to environment (specifically climate related), CSR activities are being created and enforced. Adherence to these new laws poses challenge.	Our EHS team understands the regulatory requirements to be complied with for the different legal requirements. They also seek help from the Compliance team to understand any specific compliance requirements that may be applicable. These areas are covered under the internal audit program from a compliance point of view as well. As part of sustainability reporting, independent assessments conducted (by external consultants/experts) also help in addressing gaps if any in this area.	Negative Implications
2.	Regulatory Compliance	Risk	Failure to comply with regulatory requirements can manifest in financial and reputational consequences for an organisation and erode stakeholder trust.	The Company has a robust set of environmental, social and governance-related policies to foster a culture of compliance within the organisation. Disciplinary measures and reinforcement mechanisms have been defined as well. The ESG organogram further highlights the importance of overall compliance by positioning the CS in a key role, ensuring overall corporate governance in all three verticals (ESG). In addition, Legal and functional teams also monitor the regulatory compliances across businesses at defined frequencies.	Negative Implications

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

Sr. No.	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
3.	Community Development	Opportunity	Community development activities helps a company to create a positive impact on society by undertaking meaningful interventions to bring significant benefits to large sections of the society. The CSR efforts also help foster a more productive and positive work environment for employees.	The Rustomjee Foundation has been striving to create sustainable opportunities for the marginalized communities by facilitating quality education, sustainable livelihood development, promoting a healthy society and supporting rural infrastructure development. The outreach as of now has been to 741 Students, villages in Maharashtra. With an aim to contribute to the holistic development of communities, Rustomjee Foundation is contributing to the global agenda of meeting Sustainable Development Goals (SDGs) related to eradicating poverty and providing education to the underprivileged strata of society.	
4.	Modernization, Innovation and Resource Optimization	Opportunity	The world is changing constantly and to remain relevant and profitable, it is an essential need to adapt and develop new advancements for meeting new realities. The same applies to construction industry during and post construction	Innovation advancements are at centre stage, which supports enhancing operational efficiency, and reducing overall environmental impacts. The company has invested in technologies and made changes to its processes to reduce resource consumption not only during the construction phase but also as a sustainable impact to its customers. Energy efficiency through passive and active measures, reduced water consumption, effective waste management, use of sustainable and green products in the buildings are some of the initiatives taken and being enhanced for future projects. As a result two of our larger projects have achieved a silver rating from IGBC's new building rating systems and most of our upcoming and ongoing projects are slated to be certified under IGBC's new building rating systems. We are also in the process of initiating one of our key projects.	
5.	Scarcity of Water	Risk	Water is a shared resource, making it important for businesses to use it responsibly. Ensuring responsible consumption is key to the business' social license to operate and a sustainable planet for all. Water being an important resource in construction industry its scarcity may lead to disruptions in operations and delay timelines of project completion.	Mumbai and its suburban areas/adjoining districts receive good rainfall every year and ground water table is recharged. The turbidity of water and the sulphate and iron content in water used for construction may pose a threat to quality of construction (corrosion etc). The cost of treatment of GW, procuring water and non-supply of municipal water will become a high-risk event in the future. KRL and its subsidiaries continues to adopt water conservation strategies across all of the existing project sites and also supplement internal water generation by procuring water from outside agencies. Rainwater harvesting system has been implemented at few facilities which helps in increasing the ground level water. This results in release of sub soil water from recharge pits, and this reduces the dependency on external agencies. The Company has instituted an EHS Policy that highlights the importance of Resource Conservation, this serves as a guiding principle to reduce consumption of water and other resources. The EHS team runs awareness campaigns to ensure that all personnel are aware of the risk related to water shortage.	Negative Implications

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

Sr. No.	Material issue identified	identified whether risk or opportunity Human Rights such as child labor, forced/compulsory labor, health and safety, discrimination and freedom of association and collective bargaining including anti-harassment whether risk/opportunity risk/opportunity risk/opportunity risk/opportunity risk/opportunity risk/opportunity risk/opportunity risk/opportunity risk/opportunity risk/opportunity		In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
6.	such as child labor, forced/ compulsory labor, health and safety, discrimination and freedom of association and collective bargaining including anti-			The Company has constituted a standing forum, both at the Group Level as well as at individual entity level, that aids and advises the management in its approach towards building sustainable Human Rights. Group HR is responsible to ensure that any issue or impact related to human rights are addressed in the defined manner within the stipulated timeline. The Company has a robust contractor management system which ensures human rights practices are adhered to (as per ILO) by the contractors supplying man-power to the Company. We have very stringent norms for child labor, anti-discrimination, forced labor or bonded labor, anti- harassment, workers health and safety and other human rights issues at all project sites.	Negative Implications
7.		Opportunity	performance helps deliver value to investors and reinvest in the growth of the business, employees, communities and other	The Company thrives to deliver strong economic performance through our operational practices and risk mitigation strategies that supports the nation building and create a value for all the stakeholders.	Positive Implications
8.	Climate change resulting in acute and chronic physical conditions	Risk	Severe weather events are a risk to our operations and asset management along with internal as well as external stakeholders. Climate risk is material to customers, investors, and employees too. Responding to these concerns has become central to stakeholder understanding of climate-related risk to the company. Climate change can impact our operations due to extreme weather conditions like cyclones, floods, droughts and heat waves, to name a few events that have the potential to create severe disruptions	The Company is in the process of implementing various initiatives across projects sites/facilities to control our scope 1 and 2 GHG emissions mainly due to energy consumption & Waste generation. The company is in the process of also calculating our scope 3 emissions in 3 major categories applicable to our business in FY24-25. We also plan to work closely with our critical suppliers to understand their strategies to comply with and move beyond on their material ESG issues. Hazard Identification and Risk assessment with regards to severe weather conditions have been identified and action (emergency response) plans to mitigate their effects are in place. Exposure of workers to extreme weather conditions has been identified and control measures put in place.	
9.	Waste Management	Risk	create severe disruptions. Improper disposal of waste will lead to non-adherence of compliance and result in GHG emission. Waste Management is critical to ensure judicious use of resources and disposal under controlled conditions. We would like to follow the 3R principle of waste management at all our project sites and are in the process of setting goals to achieve the same.	Improper disposal of waste will lead to non-adherence of compliance and result in GHG emission. Waste Management is critical to ensure judicious use of resources and disposal under controlled conditions. We would like to follow the 3R principle of waste management at all our project sites and are in the process of setting goals to achieve the same.	

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

Sr. No.	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
10.	Occupational health and safety	Risk	Failure to ensure the health, safety and well-being of the company employees and contractor workforce can impact productivity. This can consequently affect our business operations, customer satisfaction and profitability.	The Company strives to foster a safe working environment and ensure Zero Harm. Hazards and risks are periodically identified, with mitigation plans devised for each. Additionally, safety trainings are provided to employees and workers (labour force) on regular basis to ensure their holistic well-being. Safety and Health of labour workers is critical and our Contractor management system ensures the requirements are adhered to.	
11.	Occupational health and safety	Opportunity	The world is changing constantly and to remain relevant and profitable, it is an essential need to adapt and develop new advancements for meeting new realities. The same applies to construction industry during and post construction		
12.	Cybersecurity and data privacy.	Risk	Protecting customer (personal) and company information is of utmost concern to us. This ensure trust in the company and misappropriation of data.	We have an information security and incident management policy in place. Awareness on the policy was cascaded to all employees within the company for compliance in FY23-24 and will be continued in the coming Financial years. Presently we have access control review mechanisms that are also enabled by segregation of duties. This ensures protection of all information systems. Moving forward we are working on masking personal sensitive information as would be outlined in the data protection bill in the future.	

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

Disclosure Question

Policy and management processes.

			P1	P2	Р3	P4	P5	P6	P7	P8	P9
1.	a.	Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b.	Has the policy been approved by the Board?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	C.	Web Link of the Policies, if available		<u>ht</u> i	tps://www.ru	ustomjee	.com/about	t-us/codes	s-and-poli	<u>icies</u>	
2.		s the entity has translated the icy into procedures?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.		the enlisted policies extend our value chain partners?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4.	Name of the national and international codes/certificatio ns/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.		No	No	ISO 45000, ISO 26000	GRI	ISO 26000, SA 8000	ISO 14001	No	ISO 9001, ISO 27001	No

P1	P2	P3	P4	P5	P6	P7	P8	P9

Specific commitments, goals and targets set by the entity with defined timelines, if any.

P1

- 1. Zero tolerance to bribery or corruption.
- Reporting on non-financial indicators aligned to GRI and UNSDG standards. 2.
- Conduct Pre- Assessment for GRESB ratings. 3.
- 4. To formalise ESG Strategy by forming an ESG Board Committee.

P2

- Increase our engagement with supply chain by communication of our supplier code of 1. conduct to a larger pool of vendors.
- 2. We intend to cascade/create awareness on our human right policy amongst employees and contract workers.

P3

- Achieve zero lost time accidents (LTA). 1.
- 2. ISO 45001 Occupational Health and Safety Management System.

P4

NA

P5

- 1. Train 100% of employees on Human Rights.
- 2. Zero tolerance to harassment and zero human rights violations.

P6

- 1. 50% of our projects starting from FY 2025-26 shall be certified to IGBC Green Building Certification.
- 2. To continue with our pilot "Net Zero Carbon" project for our 1st plotted development at
- 3 To initiate a commercial pilot project with a goal to achieve certification as an IGBC plantinum or gold.
- ISO 14001:2015 Environment Management System. 4.
- Eliminate the use of single use plastic across operations. 5.

P7

NA

P8

Take up impactful CSR projects to benefit the community and environment.

Р9

Set IT Security management System aligned to ISO 27001.

Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.

We have achieved zero cases of bribery or corruption.

P2

We have finalised the supplier code of conduct and communicated to 32 critical suppliers.

Р3

- 1. We have achieved zero lost time accidents (LTA) at all our sites and offices.
- We have initiated OH&S management system (ISO:45001) at corporate level. 2

P4

We conducted materiality assessment and ESAT survey covering 100% of employees.

P5

- We have achieved zero harassment cases recorded and zero human rights violations. 1.
- 2. We provided a world class labor accomadation for 500 contract workers at Thane. (Details mentioned in Principle 5).

P	1 P2	Р3	P4	P5	P6	P7	Р8	P9
P6	'							
1.	Although the plastic at projectionts).							_
2.	We designed our plotted de			on project	focusing	on energy,	waste and	l water fo
3.	70% of our protection Tarrif).	ojects in F	Y24-25 use	d Green P	ower for c	onstructior	n activities	(as Green
4.	Scope 2 emis	sions redu	ced by 96%	due to the	above tra	nsition.		
5.	66% of our C8 lines.	&D waste w	as diverted	away fron	n land fill f	or reuse in	BMC appro	ove metro
P7								
NA								
Р8								
Our	sourcing from	MSME incr	eased to 19	62%.				
P9								
We i	mproved our i	nformation	security sys	stems by n	naking the	m more rol	oust.	

Governance, leadership and oversight

7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure).

Please refer Chairman and Managing Directors' Letter in the annual report.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).

Mr. Boman Irani (Chairman and Managing Director)

9. Does the entity have a specified Committee of the Board/Director responsible for decision making on sustainability related issues?

Yes

If yes, provide details.

Chairman and Managing Director is nominated Director for decision making on Sustainability/ESG related issues.

10. a. Indicate whether review was undertaken by Director/Committee of the Board/Any other Committee

	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against	Committee								
above policies and	of the								
follow up action	Board								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Committee								
	of the								
	Board								

b. Frequency (Annually/Half yearly/Quarterly/Any other - please specify)

	P1	P2	Р3	P4	P5	Р6	P7	P8	P9
Performance against above policies and follow up action	Periodically								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Periodically								

11. Has the entity carried out independent assessment/evaluation of the working of its policies by an external agency?

	P1	P2	Р3	P4	P5	P6	P7	P8	Р9
Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency?	Yes								
If yes, provide name of the agency.	Independent Consultant								

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

	P1	P2	Р3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business	NA								
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles	NA								
The entity does not have the financial or/ human and technical resources available for the task	NA								
It is planned to be done in the next financial year	NA								

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

Essential Indicators

1. Percentage coverage by training and awareness programmes on any of the Principles during the financial year

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	1	ESG	16.67 %
Key Managerial Personnel	2	POSH, ESG	100%
Employees other than BoD and KMPs	61	Cyber security, Health and Safety, Orientation on ESG and ISO	43.57 %
Workers	0	NA	0%

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

Monetary

	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred?
Penalty/Fine		Nil	0	NA	
Settlement		Nil	0	NA	
Compounding fee		Nil	0	NA	

Non-Monetary

	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred?
Imprisonment				
Punishment				

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 the regulatory/enforcement agencies/judicial institutions
	NA

4. Does the entity have an anti-corruption or anti-bribery policy?

Yes

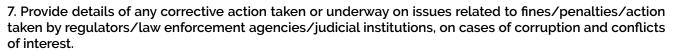
If yes, provide details in brief and if available, provide a web-link to the policy. https://www.rustomjee.com/about-us/codes-and-policies/#investor-pdf-2

5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/corruption:

	2024-25	2023-24
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

	2024-25		2023-24	
	Number	Remarks	Number	Remarks
Complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA



We are pleased to report that all processes functioned as intended, and no corrective actions were required during this period.

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

	2024-25	2023-24
Number of days of accounts payables	183.61	219.91

9. Open-ness of business Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

Parameter	Metrics	2024-25	2023-24
Concentration of Purchases	Purchases from trading houses as % of total purchases	11.04 %	17.39 %
	Number of trading houses where purchases are made from	345	319
	Purchases from top 10 trading houses as % of total purchases from trading houses	68.66 %	63.77 %
Concentration of Sales	Sales to dealers/distributors as % of total sales	0%	0%
	Number of dealers/distributors to whom sales are made	0	0
	Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	0%	0%
Share of	Purchases with related parties/Total Purchases	6.90 %	0.58 %
related party transactions	Sales to related parties/Total Sales	0.04 %	0.29 %
transactions	Loans & advances given to related parties/Total loans & advances	28.35 %	52.34 %
	Investments in related parties/Total Investments made	20.13 %	27.52 %

Leadership Indicators

1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year

Total number of awareness programmes held	Topics/principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programmes
3	Basics of ESG, BRSR Framework undrstanding and BRSR Core	20%

2. Processes to manage conflict of interests

Yes

If Yes, provide details of the same.

KRL prioritizes ethical conduct. We have clear policies and procedures to manage potential conflicts of interest arising from related-party transactions with Board members. This includes annual declarations, prior approval requirements, and abstention from discussions where a common directorship exists, fostering a culture of transparency and sound decision-making.

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.

	2024-25	2023-24	Details of improvements in environmental and social impacts
Sustainable R&D %age	0%	0%	
Sustainable Capex %	19.02 %	3.88 %	

Sustainable sourcing

2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)?

Yes

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

0%

Note:

We have a Supplier Code of Conduct that has been communicated and acknowledged by our critical material vendors, based on their spend (e.g., steel, Cement, Concrete, and Aggregate vendors). We have also conducted assessments for these critical vendors to understand their sustainability maturity. However, we have yet to validate/audit their sustainability practices.

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life

Plastics (including packaging)	Not applicable as we are not a manufacturing organization
E-waste	Not applicable as we are not a manufacturing organization
Hazardous waste	Not applicable as we are not a manufacturing organization
Other waste	Not applicable as we are not a manufacturing organization

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

Νo

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?

Yes

Provide details in the following format:

NIC Code	Name of Product/Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective/ Assessment was conducted	Was it conducted by an independent external agency	Results communicated in public domain (Yes/No) If yes, provide the web- link
5001	Construction of residential buildings including additions and alterations	0%	Cradle to Cradle	Yes	No

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
	NA	

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 inp	Recycled or re-used input material to total material				
	2024-25	2023-24				
AAC Block	70.01 %	70.00 %				
Steel	100 %	100 %				
Cement	15.01 %	15.00 %				

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:

		2024-25		2023-24			
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed	
Plastics (including packaging)	0	0	0	0	0	0	
E-waste	0	0	0	0	0	0	
Hazardous waste	0	0	0	0	0	0	
Other waste	0	0	0	0	0	0	

Note:

Not Applicable

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
NA	0 %

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

Essential Indicators

- 1. Well-being of employees and workers
- a. Details of measures for the well-being of employees:

Category		% of employees covered by											
	Total	Health insurance		Accident	insurance	Maternity	Maternity benefits		Paternity Benefits		facilities		
	(A)	Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)		
				ı	Permanent	employee	s						
Male	874	874	100 %	874	100 %	0	0 %	0	0 %	0	0 %		
Female	236	236	100 %	236	100 %	236	100 %	0	0 %	0	0 %		
Total	1,110	1,110	100 %	1,110	100 %	236	21.27 %	0	0 %	0	0 %		
				Other	than perma	anent emp	loyees						
Male	487	487	100 %	487	100 %	0	0 %	0	0 %	0	0 %		
Female	210	210	100 %	210	100 %	210	100 %	0	0 %	0	0 %		
Total	697	697	100 %	697	100 %	210	30.13 %	0	0 %	0	0 %		

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

Category					% of v	vorkers cov	ered by				
	Total	Health i	nsurance	Accident	insurance	Maternity	/ benefits	Paternity	Benefits	Day Care	facilities
	(A)	Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
					Permane	nt workers					
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%
				Othe	er than peri	nanent wo	rkers				
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%

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent)

	2024-25	2023-24
Cost incurred on well-being measures as a % of total revenue of the company	O.13%	0.09%

Note:

Health Benefits & Accident insurance is applicable as per eligibility of employees.

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

Benefits		2024-25		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	100%	0%	Yes	100%	0%	Yes	
Gratuity	100%	0%	Yes	100%	0%	Yes	
ESI	100%	0%	Yes	100%	0%	Yes	

Note:

Retirement benefits viz. PF, ESIC, Gratuity will be applicable as per eligibility.

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?

Yes

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? Yes

If so, provide a web-link to the policy.

https://www.rustomiee.com/about-us/codes-and-policies/

5. Return to work and Retention rates of permanent workers that took parental leave.

	Permanent	Employeess	Permanent Workers		
	Return to work rate	Retention rate	Return to work rate	Retention rate	
Male	0%	0%	0%	0%	
Female	100%	100%	0%	0%	
Total	100%	100%	0%	0%	

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker?

Yes

If yes, give details of the mechanism in brief.

	Grievance mechanism available?	If yes, provide details
Permanent Workers	No No	While KRL does not directly employ any workers, we are committed to operating responsibly. We have established a formal process for workers at our project sites to voice their opinions and ensure a fair and respectful work environment.
Other than Permanent Workers	No	While KRL does not directly employ any workers, we are committed to operating responsibly. We have established a formal process for workers at our project sites to voice their opinions and ensure a fair and respectful work environment.
Permanent Employees	Yes	To ensure a fair and respectful work environment, we offer a documented grievance redressal policy accessible to all employees and On-the-Job Trainees (OTEs) through our employee handbook.
Other than Permanent Employees	Yes	To ensure a fair and respectful work environment, we offer a documented grievance redressal policy accessible to all employees and On-the-Job Trainees (OTEs) through our employee handbook.

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

Category		2024-25			2023-24				
	Total employees/ workers in respective category (A)	No. of employees/ workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees/ workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D/C)			
Total Permanent Employees	1,110	1,110	100 %	877	0	0 %			
Male	874	874	100 %	693	0	0 %			
Female	236	236	100 %	184	0	0 %			
Total Permanent Workers	0	0	0 %	O	0	0 %			
Male	0	0	0 %	0	0	0 %			
Female	0	0	0 %	0	0	0 %			

8. Details of training given to employees and workers:

Category			2024-25			2023-24				
	Total (A)		On Health and safety measures		On Skill upgradation			alth and neasures		skill dation
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
				Emp	oloyees					
Male	1,361	784	57.61 %	832	61.14 %	1,148	326	28.40 %	762	66.38 %
Female	446	1	0.23 %	232	52.02 %	276	34	12.32 %	216	78.27 %
Total	1,807	785	43.45 %	1,064	58.89 %	1,424	360	25.29 %	978	68.68 %
				We	orkers					
Male	0	0	0%	0	0%	0	0	0%	0	0%
Female	0	0	0%	0	0%	0	0	0%	0	0%
Total	0	0	0%	0	0%	0	0	0%	0	0%

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

Category		2024-25		2023-24							
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)					
Employees											
Male	1,361	1,361	100%	1,148	1,148	100%					
Female	446	446	100%	276	276	100%					
Total	1,807	1,807	100%	1,424	1,424	100%					
		\	Workers								
Male	0	0	0%	0	0	0%					
Female	0	0	0%	0	0	0%					
Total	О	0	0%	0	0	0%					

10. Health and safety management system

a. Whether an occupational health and safety management system has been implemented by the entity? Yes

If yes, the coverage of such a system

Yes, KRL has fully implemented occupational health, safety wellbeing and environmental requirements both in letter and spirit. We have established an EHS policy that applies to our head office and all project sites. This policy outlines our philosophy and commitment to managing key aspects of health, safety, and environment (HSE). Regular inspections of critical and hazardous processes are conducted to ensure adherence to these standards.

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

We have established a comprehensive process for Hazard Identification & Risk Assessment. All hazards and risks arising from facility operations are identified and evaluated based on two parameters: frequency and duration, and severity and likelihood. Detailed risk assessments have been conducted for all operations at project sites, with appropriate control measures implemented to mitigate identified risks and hazards. The detailed process and procedure for hazard identification and risk assessment are documented in our safety manual, which is available at all sites.

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

Yes

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

Yes

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

Safety Incident/Number	Category	2024-25	2023-24
Lost Time Injury Frequency Rate (LTIFR)	Employees	0	0
	Workers	0	0.26
Total recordable work-related injuries	Employees	0	0
	Workers	25	20
Number of fatalities from work-related	Employees	0	0
injuries	Workers	0	0
Number of high-consequence	Employees	0	0
work-related injuries	Workers	0	0

12. Describe the measures taken by the entity to ensure a safe and healthy work place.

At KRL, the safety and well-being of our team, the communities we partner with, and the clients we serve is paramount. We are committed to upholding the highest standards of health, safety, and environment (HSE) across all our projects.

Comprehensive HSE Framework:

OHS Framework Integration: We adhere to the Occupational Health and Safety (OHS) Framework principles in their entirety at every project site.

EHS Policy Coverage: Our overarching EHS Policy encompasses all our locations and personnel, including permanent employees, contractual workers, and vendors.

Regulatory Compliance: We meticulously comply with all relevant health and safety regulations as mandated by the BOCWA requirements.

Proactive Risk Management:

KRL implements a robust occupational health and safety key matrix. This matrix ensures regular monitoring of several crucial aspects:

OHS compliance Near-miss recordings Incident recordings

Lost time injury recordings Emergency preparedness

Operational control monitoring and measurement

Training and awareness programs

Investing in a Culture of Safety:

This year, our project sites independently conducted a wide range of programs on various construction safety topics. These programs aim to: Train our workforce in comprehensive well-being practices

Promote healthy behaviors and safety awareness Prevent and mitigate potential health and safety risks

The scope of these initiatives conducted at project sites were significant as stated below:

622 Health and Safety awareness trainings were delivered.

8,785 toolbox talks and safety briefings were conducted.

18,258 workers received health and safety inductions.

18,258 workers were covered by safety briefings.

Continuous Improvement Through Inspections:

Our dedicated safety team conducts regular internal inspections along with third party inspections conducted at all project sites. Last year alone, 540 inspections were carried out to identify and address any potential hazards proactively. The results of inspections/assessments are taken seriously and actions taken to correct and prevent recurrence of adverse situations.

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

	2024-25			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		
Working Conditions	1	0	Virar Avenue: Labor camp there was water leakage by windows in the rooms, which was repaired and is pest control continuously.	0	0	No complaints filed during the FY 2023- 2024 no No complaints rised		

13. Number of Complaints on the following made by employees and workers: (Contd.)

		2024-25		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	
Health & Safety	1	0	Virar Avenue: Drinking water complaints by labors solved it at site.	0	0	Drinking water complaints was raised by labors at one of the sites and the same was resolved immediately	

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	100%
Working Conditions	100%

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks/concerns arising from assessments of health & safety practices and working conditions:

We are pleased to report that all processes functioned as intended, and no corrective actions were required during this period.

Leadership Indicators

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

Employees	Yes
Workers	No

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

The labor compliance team ensures that all statutory dues are deducted and deposited in accordance with legal requirements. Our contracts with labor agencies explicitly state that these obligations must be adhered to by our labor contractors.

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:

	Total no. of affected	employees/workers	No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment			
	2024-25	2023-24	2024-25	2023-24		
Employees	0	0	0	0		
Workers	1	0	0	0		

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment?

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done) assessed				
Health and safety practices	20%				
Working Conditions	20%				

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.

NA

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.

From the very beginning, KRL has embraced a core value of inclusivity. This commitment extends not only to our diverse talent pool but also to all our stakeholders. We believe in fostering strong partnerships with our suppliers, treating our customers with unwavering dedication, and contributing to social causes even during challenging economic times. These actions are driven by our deeply embedded principles of inclusivity and a desire to make a positive impact.

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

Whether identified as Vulnerable & Marginalized Group	Channels of communication	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
No	Email, Community Meetings	Annually	Health & Safety at workplace, HR policies, Compliance to ESG by different departments, Reward & Recognition.
No	Email, Community Meetings	Quarterly	Business related and other allied matters.
No	Email, Community Meetings	Quarterly	Business performance review.
No	Email, Community Meetings	Quarterly	Negotiations, New contracts, Payments, Updates on new products which are sustainable, Quality of products.
No	Email,Community Meetings	Quarterly	Issues related to labour compliances including welfare, health & safety of contract labour at sites & labour camps.
No	Email,Community Meetings	As and when required/	Discussion on compliances with legal authorities on existing & upcoming regulations.
	as Vulnerable & Marginalized Group No No No No No No	as Vulnerable & Communication No Email, Community Meetings No Email, Community Meetings	as Vulnerable & Marginalized GroupcommunicationengagementNoEmail, Community MeetingsAnnuallyNoEmail, Community MeetingsQuarterlyNoEmail, Community MeetingsQuarterlyNoEmail, Community MeetingsQuarterlyNoEmail, Community MeetingsQuarterlyNoEmail, Community MeetingsAs and when required/

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.

Leadership and Board Engagement:

Chairman and Managing Director Presentation: The Chairman and Managing Director spearheads ESG initiatives, presenting relevant matters to the Board of Directors for oversight and strategic direction.

Board Feedback and Action: The Board provides feedback and potential action items on the presented ESG matters. The status of these items is then tracked and reported at subsequent Board meetings, ensuring accountability and progress.

Stakeholder Engagement:

Committee Meetings: Through dedicated committees, KRL engages with various stakeholders on a range of economic, environmental, and social topics. This fosters open communication and collaboration on ESG issues.

Internal Stakeholder Support: The ESG team conducts regular meeting and surveys with internal stakeholders. These meetings aim to:

- Promote ESG Compliance: Equip employees with the knowledge and resources necessary to comply with ESG best practices within their roles.
- Share Updates: Keep internal stakeholders informed about recent developments in the ESG landscape.
- 2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics. (Yes/No)
 Yes

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.

At KRL, we are committed to integrating Environmental, Social, and Governance (ESG) principles into our core business practices. We actively seek and value stakeholder input to ensure our ESG efforts are comprehensive and impactful.

Dedicated Resources and Reporting:

ESG Resources: We have dedicated ESG resources available, demonstrating our commitment to ESG leadership. Annual ESG Report: We publish an annual ESG report, providing transparency on our ESG activities and initiatives. Stakeholder Engagement and Policy Development:

Regular Meetings: We hold regular meetings with internal stakeholders to gather valuable insights and perspectives on ESG practices.

Policy Review and Alignment: Inputs received during these meetings inform our review and potential revision of existing policies and procedures to ensure alignment with evolving ESG standards.

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

KRL's CSR initiatives with NGOs focus on partnering with vulnerable stakeholders to address their most pressing needs, driving lasting positive change.

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		2024-25		2023-24							
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)					
Employees											
Permanent Employees	1,110	0	0%	877	174	19.85 %					
Other than Permanent	697	0	0%	547	257	46.99%					
Total Employees	1,807	0	0%	1,424	431	30.27%					
		We	orkers								
Permanent Workers	0	0	0%	0	0	0%					
Other than Permanent	0	0	0%	0	0	0%					
Total Workers	O	0	0%	0	0	0%					

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

Category	2024-25				2023-24					
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	•	ual to um Wage		e than um Wage
		(B)	% (B/A)	(C)	% (C/A)		(E)	% (E/D)	(F)	% (F/D)
				Emp	oloyees					
Permanent Employees	1,110	1	0.10%	1,109	99.91%	877	5	0.58%	872	99.43%
Male	874	1	0.12%	873	99.89%	693	5	0.73%	688	99.28%
Female	236	0	0%	236	100%	184	0	0%	184	100%

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

Category		2024-25		2023-24						
	Total (A)		ıal to ım Wage		than m Wage	Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		(B)	% (B/A)	(C)	% (C/A)		(E)	% (E/D)	(F)	% (F/D)
Other than Permanent Employees	697	1	0.15%	696	99.86%	547	473	86.48%	74	13.53%
Male	487	1	0.21%	486	99.80%	455	392	86.16%	63	13.85%
Female	210	0	0%	210	100%	92	81	88.05%	11	11.96%
				W	orkers					
Permanent Workers	0		0%		0%	0		0%		0%
Male	0		0%		0%	0		0%		0%
Female	0		0%		0%	0		0%		0%
Other than Permanent Workers	0		0%		0%	0		0%		0%
Male	0		0%		0%	0		0%		0%
Female	0		0%		0%	0		0%		0%

3. Details of remuneration/salary/wages

a. Median remuneration/wages:

	ı	Male		males
	Number	Median remuneration/ salary/wages of respective category (in ₹)	Number	Median remuneration/ salary/wages of respective category (in ₹)
Board of Directors (BoD)	5	2,75,73,802	1	24,40,000
Key Managerial Personnel	2	2,06,12,938	0	-
Employees other than BoD and KMP	1,356	9,71,149	446	7,79,959
Workers	0	-	0	-

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

	2024-25	2023-24
Gross wages paid to females as % of total wages	19.15%	17.00%

Notes:

Gross wages for employees were calculated, excluding the HRA component.

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

Yes

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

We have established a comprehensive framework of policies to empower employees and ensure their concerns are addressed effectively.

Grievance Redressal Policy: Implemented in FY22-23, this policy (available in the employee handbook) provides a clear mechanism for reporting and resolving employee grievances. An escalation matrix ensures timely and fair resolution.

POSH Policy: This policy, also included in the employee handbook, prohibits workplace harassment and outlines steps for prevention and reporting. We recently conducted a company-wide webinar to ensure all employees at KRL and its subsidiaries are familiar with their rights and how to access support.

Whistleblower Policy: This policy empowers employees to report potential wrongdoing or unethical behavior directly to top management. Clear reporting procedures and actions to be taken are outlined in the policy, accessible via the employee handbook and cascaded through a webinar, aligning with other human rights policies.

6. Number of Complaints on the following made by employees and workers in the previous financial year:

	2024-25					
	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	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour/Involuntary Labour	0	0	NA	0	0	NA
Wages	0	0	NA	0	0	NA
Other human rights related issues	0	0	NA	0	0	NA

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

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

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

At KRL, we are committed to the highest standards of professionalism, integrity, and ethical business practices. This commitment extends to creating a fair and respectful work environment for all employees.

Core Values:

- Fairness and Transparency: We strive for fairness and transparency in all our actions, as reflected in our company policies.
- Mutual Trust and Equality: We believe in fostering a culture of mutual trust and equality, where everyone feels respected and valued.
- **Equal Opportunities and Non-Discrimination:** We strongly uphold the right to work in a professional environment with equal opportunities and a complete absence of discriminatory practices, including harassment of any kind.

Strong Support Systems:

To ensure a safe and inclusive workplace, we have implemented robust support systems:

- Grievance Redressal Mechanism: A well-defined process allows employees to address any concerns effectively.
- **Prevention of Sexual Harassment Policy (POSH):**This policy prohibits sexual harassment and outlines clear reporting procedures.
- Whistleblower Policy: This policy empowers employees to report unethical behavior directly to top management without fear of retaliation. Any attempt to retaliate against someone who raises a concern is subject to disciplinary action.

9. Do human rights requirements form part of your business agreements and contracts?

Yes

10. Assessments conducted:

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

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

We are pleased to report that all processes functioned as intended, and no corrective actions were required during this period.

Leadership Indicators

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

We are pleased to report that all processes functioned as intended, and no process modifications were required during this period.

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

This year, our Human Rights Policy received formal approval from the Board, reinforcing our commitment to promoting and protecting human rights across our organisation, operations, and supply chain. The policy underscores our dedication to ensuring fairness, dignity, and equality for all—whether employees, contract workers, customers, or other stakeholders. It aligns with international human rights principles and legal frameworks, while also fostering an inclusive and respectful work environment.

At Keystone Realtors Limited (KRL) and its subsidiaries (Rustomjee), we firmly believe in the inherent dignity and rights of every individual. This belief is embedded in our business ethos and extends across all levels of our operations. We are committed to cultivating workplaces free from discrimination, harassment, or any form of human rights violation. Our responsibility also extends to the communities we engage with, where we strive to uphold these values.

In line with this commitment, we have undertaken Human Rights Due Diligence across all operational assets. This includes robust assessments to monitor and prevent violations such as child labour, forced or bonded labour, and to ensure the health, safety, and overall well-being of both employees and contract workers across all our projects.

To support the dignity and welfare of contract workers, we have developed labour camps at select project sites that provide safe and hygienic living conditions. These camps offer access to potable drinking water, sanitised washrooms, clean rest areas, and regular pest control measures to prevent infestations. These facilities not only contribute to a healthier workforce but also enhance productivity and reduce absenteeism.

A key highlight is our new labour camp at Rustomjee Urbania, Thane—a first-of-its-kind initiative in the Indian real estate sector. Inaugurated on 13^{th} April 2025, the facility spans 35,000 sq. ft., built at a cost of ₹ 6.25 crore, and is designed to accommodate 500 workers in 84 well-ventilated rooms (each 10 ft x 10 ft, housing up to six individuals). The camp includes upgraded infrastructure such as a Sewage Treatment Plant (STP) to enable water reuse and recreational areas to support worker well-being. Looking ahead, we plan to introduce a crèche facility to support workers with families and young children.

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?

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	20%
Discrimination at workplace	20%
Child labour	20%
Forced/ involuntary labour	20%
Wages	20%

5. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 4 above.

We are pleased to report that all processes functioned as intended, and no corrective actions were required during this period.

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	2024-25	2023-24
From Renewable Sources		
Total electricity consumption (A)	13,89,66,98,400 KJ	1,65,70,40,400 KJ
Total fuel consumption (B)	0 KJ	0 KJ
Energy consumption through other sources (C)		
Total energy consumed from renewable sources (A+B+C)	13,89,66,98,400 KJ	1,65,70,40,400 KJ
From non-renewable sources		
Total electricity consumption (D)	19,65,71,61,216 KJ	11,99,92,28,400 KJ
Total fuel consumption (E)	16,64,84,36,217.593 KJ	18,76,48,33,907.54 KJ
Energy consumption through other sources (F)	0 KJ	0 KJ
Total energy consumed from non-renewable sources (D+E+F)	36,30,55,97,433.60 KJ	30,76,40,62,307.55 KJ
Total energy consumed (A+B+C+D+E+F)	50,20,22,95,833.60 KJ	32,42,11,02,707.55 KJ
Energy intensity per rupee of turnover	2,50,497.96 KJ/L INR	1,45,893.14 KJ/L INR
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	51,17,673.29 KJ/(PPP Adjusted) L INR	29,49,959.26 KJ/(PPP Adjusted) L INR
Energy intensity in terms of physical output	31,255.44 KJ/Sq ft	23,202.08 KJ/Sq ft
Energy intensity (optional) – the relevant metric may be selected by the entity	0 KJ/Nil	0 KJ/Nil

Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency?

No

Note:

41% of our electricity in FY 2024-25 has been sourced from renewable sources (Green Power).

2. Does the entity have any sites/facilities identified as designated consumers (DCs) under the Performance, Achieve and Trd(PAT) Scheme of the Government of India?

No

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

Parameter	2024-25	2023-24
Water withdrawal by source (in kilolitres)		
(i) Surface water withdrawal	1,723.91 Kilolitre	0.00 Kilolitre
(ii) Groundwater withdrawal	490.00 Kilolitre	0.00 Kilolitre
(iii) Third party water withdrawal	6,72,852.02 Kilolitre	1,72,170.00 Kilolitre
(iv) Seawater/desalinated water withdrawal	0.00 Kilolitre	0.00 Kilolitre
(v) Other withdrawal	8,192.49 Kilolitre	1,537.74 Kilolitre
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	6,83,258.42 Kilolitre	1,73,707.74 Kilolitre
Total volume of water consumption (in kilolitres)	6,83,258.42 Kilolitre	1,73,707.74 Kilolitre
Water intensity per rupee of turnover	3,409.31 L/L INR	781.68 L/L INR
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/Revenue from operations adjusted for PPP)	69,652.07 (PPP Adjusted)/L INR	15,805.47 L (PPP Adjusted)/L INR
Water intensity in terms of physical output	425.39 L/Sq ft	121.45 L/Sq ft
Water intensity (optional) – the relevant metric may be selected by the entity	0 L/Nil	0 L/Nil

Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency?

No

4. Provide the following details related to water discharged (in kilolitres):

		2024-25	2023-24
Wat	er discharge by destination and level of treatment (in kilolitre	es)	
(i)	To Surface water	0.00 Kiloliter	0.00 Kiloliter
	- No treatment	0.00 Kiloliter	0.00 Kiloliter
	- With treatment	0.00 Kiloliter	0.00 Kiloliter
Leve	el of treatment		
(ii)	To Groundwater	0.00 Kiloliter	0.00 Kiloliter
	- No treatment	0.00 Kiloliter	0.00 Kiloliter
	- With treatment	0.00 Kiloliter	0.00 Kiloliter
Leve	el of treatment		
(iii)	To Seawater	0.00 Kiloliter	0.00 Kiloliter
	- No treatment	0.00 Kiloliter	0.00 Kiloliter
	- With treatment	0.00 Kiloliter	0.00 Kiloliter
Leve	el of treatment		
(iv)	Sent to third-parties	0.00 Kiloliter	0.00 Kiloliter
	- No treatment	0.00 Kiloliter	0.00 Kiloliter
	- With treatment	0.00 Kiloliter	0.00 Kiloliter
Leve	el of treatment		
(v)	Others	0.00 Kiloliter	0.00 Kiloliter
	- No treatment	0.00 Kiloliter	0.00 Kiloliter
	- With treatment	0.00 Kiloliter	0.00 Kiloliter
Leve	el of treatment		
Tota	al water discharged	0.00 Kiloliter	0.00 Kiloliter

Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? No

5. Has the entity implemented a mechanism for Zero Liquid Discharge? $\ensuremath{\mathsf{No}}$

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

Parameter	Please specify FY unit	2024-25	2023-24
NOx	Micrograms Per Cubic Meter	56.86	3.62
SOx	Micrograms Per Cubic Meter	153.97	10.33
Particulate matter (PM)	Micrograms Per Cubic Meter	33.77	16.76
Persistent organic pollutants (POP)	Micrograms Per Cubic Meter	0	0
Volatile organic compounds (VOC)	Micrograms Per Cubic Meter	0	0
Hazardous air pollutants (HAP)	Micrograms Per Cubic Meter	0	0
Ammonia	Micrograms Per Cubic Meter	2	0
Benzene	Micrograms Per Cubic Meter	1	0
Carbon Monoxide	Micrograms Per Cubic Meter	0.65	0
Lead	Micrograms Per Cubic Meter	0.5	0
Ozone	Micrograms Per Cubic Meter	1	0
Particulate Matter < 2.5µm	Micrograms Per Cubic Meter	50.15	0

Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency?

No

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

Parameter	Unit	2024-25	2023-24
Total Scope 1 emissions	T CO2e	2,199.989	1,227.81
Total Scope 2 emissions	T CO2e	5,494.23	3,360.59
Total Scope 1 and Scope 2 emission intensity per rupee of turnover	T CO2e/L INR	0.04	0.02
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	T CO2e (PPP Adjusted)/L INR	0.78	0.42
Total Scope 1 and Scope 2 emission intensity in terms of physical output	T CO2e/Sq ft	0.005	0.003
Custom Scope 1 and Scope 2 emission intensity (optional)	T CO2e/Nil	0	0

Note 1: Our renewable energy consumption increased by 32% from last FY as a result our scope 2 emissions reduced by 96% despite an increase in total energy consumption.

Note 2: Our renewable energy for FY 24-25 is equal to grid electricity non-renewable in FY 23-24 which accounted for a larger percent of total electrical energy in FY 23-24.

Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? No

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

Yes

If Yes, then provide details.

70% of our projects have transitioned to green power for construction activities in FY 2024-25.

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

Parameter	2024-25	2023-24			
Total Waste generated (in	Total Waste generated (in metric tonnes)				
Plastic waste (A)	0.21 Metric Ton	0.40 Metric Ton			
E-waste (B)	0.00 Metric Ton	0.00 Metric Ton			
Bio-medical waste (C)	0.00 Metric Ton	0.00 Metric Ton			
Construction and demolition waste (D)	2,24,000.63 Metric Ton	50,911.83 Metric Ton			
Battery waste (E)	0.00 Metric Ton	0.00 Metric Ton			
Radioactive waste (F)	0.00 Metric Ton	0.00 Metric Ton			
Other Hazardous Waste (G)	0.00 Metric Ton	0.34 Metric Ton			
Other Non-hazardous Waste (H)	129.20 Metric Ton	151.90 Metric Ton			
Total (A + B + C + D + E + F + G + H)	2,24,130.04 Metric Ton	51,064.13 Metric Ton			
Waste intensity per rupee of turnover	1,118.36 kg/L INR	229.79 kg/L INR			
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	22,848.05 kg (PPP Adjusted)/L INR	4,646.27 kg (PPP Adjusted)/L INR			
Waste intensity in terms of physical output	139.55 kg/Sq ft	35.70 kg/Sq ft			
Custom Waste intensity metric (optional)	0 kg/Nil	0 kg/Nil			

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations and by nature of disposal method (in metric tonnes)

Parameter	2024-25	2023-24
	Plastic waste	
(i) Recycled	0.00 Metric Ton	0.00 Metric Ton
(ii) Re-used	0.00 Metric Ton	0.00 Metric Ton
(iii) Other recovery operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
	E-waste	
(i) Recycled	0.00 Metric Ton	0.00 Metric Ton
(ii) Re-used	0.00 Metric Ton	0.00 Metric Ton
(iii) Other recovery operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
Bi	io-medical waste	
(i) Recycled	0.00 Metric Ton	0.00 Metric Ton
(ii) Re-used	0.00 Metric Ton	0.00 Metric Ton
(iii) Other recovery operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
Construct	ion and demolition waste	
(i) Recycled	6,906.26 Metric Ton	0.00 Metric Ton
(ii) Re-used	1,37,288.08 Metric Ton	0.00 Metric Ton
(iii) Other recovery operations	0.00 Metric Ton	0.00 Metric Ton
Total	1,44,194.34 Metric Ton	0.00 Metric Ton
	Battery waste	
(i) Recycled	0.00 Metric Ton	0.00 Metric Ton
(ii) Re-used	0.00 Metric Ton	0.00 Metric Ton
(iii) Other recovery operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
R	adioactive waste	
(i) Recycled	0.00 Metric Ton	0.00 Metric Ton
(ii) Re-used	0.00 Metric Ton	0.00 Metric Ton
(iii) Other recovery operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
Other Hazar	dous waste. Please specify	
(i) Recycled	0.00 Metric Ton	0.00 Metric Ton
(ii) Re-used	0.00 Metric Ton	0.00 Metric Ton
(iii) Other recovery operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
Other Non-h	nazardous waste generated	
(i) Recycled	0.00 Metric Ton	0.00 Metric Ton
(ii) Re-used	0.00 Metric Ton	0.00 Metric Ton
(iii) Other recovery operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations and by nature of disposal method (in metric tonnes) previous year

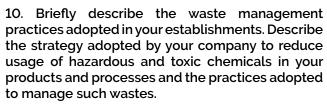
Parameter	2024-25	2023-24
P	astic waste	
(i) Incineration	0.00 Metric Ton	0.00 Metric Ton
(ii) Landfilling	0.00 Metric Ton	0.00 Metric Ton
(iii) Other disposal operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
	E-waste	
(i) Incineration	0.00 Metric Ton	0.00 Metric Ton
(ii) Landfilling	0.00 Metric Ton	0.00 Metric Ton
(iii) Other disposal operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
Bio-	medical waste	
(i) Incineration	0.00 Metric Ton	0.00 Metric Ton
(ii) Landfilling	0.00 Metric Ton	0.00 Metric Ton
(iii) Other disposal operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
Construction	and demolition waste	
(i) Incineration	0.00 Metric Ton	0.00 Metric Ton
(ii) Landfilling	0.00 Metric Ton	0.00 Metric Ton
(iii) Other disposal operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
Ва	attery waste	
(i) Incineration	0.00 Metric Ton	0.00 Metric Ton
(ii) Landfilling	0.00 Metric Ton	0.00 Metric Ton
(iii) Other disposal operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
Rad	ioactive waste	
(i) Incineration	0.00 Metric Ton	0.00 Metric Ton
(ii) Landfilling	0.00 Metric Ton	0.00 Metric Ton
(iii) Other disposal operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
Other Hazardo	us waste. Please specify	
(i) Incineration	0.00 Metric Ton	0.00 Metric Ton
(ii) Landfilling	0.00 Metric Ton	0.00 Metric Ton
(iii) Other disposal operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton
Other Non-haz	ardous waste generated	
(i) Incineration	0.00 Metric Ton	0.00 Metric Ton
(ii) Landfilling	0.00 Metric Ton	0.00 Metric Ton
(iii) Other disposal operations	0.00 Metric Ton	0.00 Metric Ton
Total	0.00 Metric Ton	0.00 Metric Ton

Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency?

No

Note:

The total construction and demolition waste generated in FY 2024-25 was 224000633.62 Kgs. However, to enhance the circularity of waste, we recovered and reused 66% of the total construction and demolition waste.



At KRL, we are dedicated to minimizing our environmental footprint throughout the construction lifecycle. Our waste management philosophy is centered on the "Reduce, Reuse, Recycle" principles, with the ultimate goal of achieving zero waste to landfill. We have documented a waste management policy aligned to ISO 14001 standards.

Minimizing Construction Waste:

Active Minimization: We actively seek ways to reduce waste generation through careful planning, material selection, and optimized processes.

Investment in Technology: We invest in innovative recycling technologies and streamlined systems to maximize resource recovery.

Circular Economy Approach: We strive to create a circular economy by converting construction waste into valuable resources whenever possible.

Waste Management at KRL Facilities:

Reduced Hazardous Waste: As a construction company, we primarily handle construction debris and materials. Our office and facility operations generate minimal hazardous waste.

Strict Regulations: We adhere to stringent regulations regarding potentially hazardous waste generated by our contractors, ensuring proper disposal through SPCB-approved recyclers.

Organic Waste Management: KRL utilizes in-house composting systems to convert organic waste generated at our sites and labor camps into fertilizer for landscaping. This reduces waste volume and creates a valuable resource.

Single-Use Plastics Phase-Out: Committed to aligning with government directives, KRL has eliminated single-use plastics at all our sites which was one of our commitments for FY 2023-24.

Construction & Demolition Waste: As a result of out circularity initiatives, we were able to divert 66% of the C&D waste away from landfill in FY 2024-25

Moving Forward:

Reinforcing 3R Principles: In the coming year, we are dedicated to further strengthening our commitment to the "Reduce, Reuse, Recycle" philosophy. This includes the following steps:

- 1. Segrigation of waste at source.
- 2. Categorization of waste into recyclable and reusable.
- 3. Reuse and Recycling of waste either in-house or through external vendors.
- Maximizing the sustainable utilization of raw materials and products to minimize waste generation at the source.

Responsible Contractor Management: KRL ensures that all hazardous waste generated by our contractors is disposed of according to the Hazardous Waste Management and Handling Rules.

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

Location of operations/ offices	Type of operations	Whether the conditions of environmental approval/clearance are being complied with?	If no, the reasons thereof and corrective action taken, if any.
		NA	

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	Results communicated in public domain	Relevant Web link
			NA		

13. Applicable environmental law/regulations/guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N).

Yes

Leadership Indicators

1. Areas of water stress

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

(i) Name of the area	(ii) Nature of operations

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

Parameter	Unit	2024-25	2023-24
Total Scope 3 emissions	T CO2e	42,058.35	8,258.32
Total Scope 3 emissions per rupee of turnover	T CO2e/L INR	0.21	0.04
Total Scope 3 emission intensity (optional)	T CO2e/NA	0	0

Note: These Scope 3 calculations are based on a spend-based method, which includes critical purchases of goods and services, as well as emissions from waste generated during operations.

Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? No

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.

NΑ

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

Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
IGBC Certification	 KRL is pursuing IGBC certifications to build sustainable projects. Our focus areas include energy and water efficiency, land use optimization, waste reduction, accessibility, EV charging, and proximity to amenities. 	IGBC Silver certification for two of our project (Crown & Azziano - Wing D&L).
	 Starting FY 2025–26, the company aims to have 50% of its portfolio IGBC Green Building certified. 	
Green Power	KRL is committed to reducing Scope 2 emissions by adopting green power solutions during the construction phase. By procuring electricity from renewable sources, we aim to minimize our carbon footprint and contribute to a sustainable future.	Reduced 95% of Scope 2 emission as a result of switching to green power.
Elimination of Single Use Plastic	In line with Central and State Government directives in India, KRL aimed to eliminate single-use plastics at all its sites through alternative arrangements from FY23-24. We have avoided single-use food and drink containers and utensils in cafeterias and meeting rooms, and we closely monitor waste generation. KRL is committed to the principles of Reduce, Reuse, and Recycle in the coming financial year, maximizing the sustainable use of raw materials and products to minimize waste generation. Additionally, we are dedicated to ensuring that hazardous waste generated by our contractors at our sites is disposed of in accordance with the HW (Management and Handling) Rules.	We have successfully eliminated single-use plastics in our offices, reducing their use by nearly 90%.
First Net-Zero Carbon Pilot Project	KRL is implementing its first pilot Net Zero Carbon project for clubhouses in Phase I of Bella Vew, Kasara — a plotted development by Rustomjee (KRL)	Developing and adopting Net Zero Carbon architecture for all future projects.
Reduction in Paper Consumption	KRL is committed to reducing paper consumption by implementing paper- saving measures such as pin-based printing, double-sided printing, and reducing tissue paper usage. These initiatives contribute to resource conservation and minimize our environmental impact.	Reduction in usage of paper and waste
Carbon Sequestration	KRL has initiated a carbon sequestration project at Bellavue Kasara	Offset carbon emissions from the project.

5. Does the entity have a business continuity and disaster management plan?

Yes

If yes, give details in 100 words/web link.

https://www.rustomjee.com/about-us/codes-and-policies/#investor-pdf-19

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?

The company has established labour camps at select project sites to support contract workers with safe and dignified living conditions. Aligned with our commitment to human rights and equality, we ensure that all contract labourers have access to essential amenities, including safe drinking water, hygienic and sanitised washrooms, clean rest areas, and robust housekeeping practices such as regular pest control to prevent infestations. These measures not only safeguard the health and well-being of our workforce by preventing the spread of diseases but also contribute to improved productivity and reduced absenteeism.

The labour housing incorporates eco-conscious infrastructure, including a 40 KLD Sewage Treatment Plant (STP) that recycles water for flushing and landscaping, and a 200 KG Organic Waste Composter (OWC) to manage kitchen waste on-site. A comprehensive fire protection network, with 13 yard hydrants, 900 LPM fire pumps, and sprinklers in critical areas like the gas bank and kitchen, ensures round-the-clock safety.

Efficient Hutments: Workers' accommodation built with PUF panels, offering thermal insulation to maintain cooler indoor temperatures

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

20%

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: 3

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

Sr. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/associations
1.	CREDAI	National
2.	CREDAI-MCHI	State
3.	IMC	State

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

Public policy advocated	Method resorted for such advocacy	Whether information available in public domain?	Frequency of Review by Board	Web Link, if available

Principle 8: Businesses should promote inclusive growth and equitable development

Essential Indicators

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

Name and brief details of project	SIA Notification No	Date of notification	Whether conducted by independent external agency	Results communicated in public domain	Relevant Web link
Not Applicable as there were no projects initiated this year that required this study					

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

Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In ₹)
Goregaon PG	Maharashtra	Mumbai Suburban	210	100 %	4,11,00,000

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

KRL is committed to maintaining open communication with the communities in which we operate. We have established a streamlined process for receiving and addressing community complaints.

Multiple Channels: We provide various channels for residents to submit complaints, ensuring accessibility for all.

Priority Action: Upon receiving a complaint, the designated point of contact (SPOC) within the relevant department promptly takes ownership and works towards a swift resolution.

Logical Solutions: Our focus is on finding practical and effective solutions that address the root cause of the concerns raised by the community.

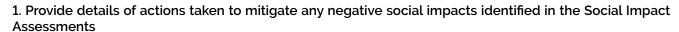
4. Percentage of input material (inputs to total inputs by value) sourced from suppliers

	2024-25	2023-24
% of materials sourced from MSMEs/small producers	19.62 %	16.69 %
% of materials sourced directly from India	100 %	98.23 %

5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/on contract basis) in the following locations, as % of total wage cost

	2024-25	2023-24
Rural	0%	0%
Semi-urban Semi-urban	0%	0%
Urban	0%	0%
Metropolitan	100%	100%





Details of negative social impact identified	Corrective action taken	
	NA	

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

State	Aspirational District Amount sper	
Maharashtra	Mumbai City	1,71,90,000
Maharashtra	Aurangabad	7,50,000
Maharashtra	Nagpur	1,00,00,000
Maharashtra	Sangli	50,10,000
Odisha	Kendujhar (Keonjhar)	21,00,000
Uttarakhand	Dehradun	11,00,000
Uttar Pradesh	Jalaun	5,00,000

Note: The above CSR spending is done by Keystone Realtors Limited (KRL) and all its subsidiaries. However, the CSR spending by KRL is ₹ 272 lakhs

3. a. Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/vulnerable groups?

No

b. From which marginalized/vulnerable groups do you procure?

Not Applicable

Leadership Indicators

c. What percentage of total procurement (by value) does it constitute?

0%

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge

Intellectual Property based on traditional knowledge	Owned/Acquired	Benefit shared	Basis of calculating benefit share
	NA		

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
	NA	

6. Details of beneficiaries of CSR Projects

CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups	
	NA		

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.

KRL recognizes the importance of open communication and strives to continuously improve customer satisfaction. To achieve this, we have established a comprehensive system for receiving and responding to consumer complaints and feedback.

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	0%
Safe and responsible usage	0%
Recycling and/or safe disposal	0%

Notes:

NA as the company is not into the manufacturing of products.

3. Number of consumer complaints in the previous financial year:

	2024-25		2023-24			
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0		0	0	
Advertising	0	0		0	0	
Cyber-security	0	0		0	0	
Delivery of essential services	23	9		113	46	
Restrictive Trade Practices	0	0		0	0	
Unfair Trade Practices	0	0		0	0	
Other	0	0		6	6	

4. Details of instances of product recalls on account of safety issues

	Number	Reasons for recall
Voluntary recalls	0	Not Applicable
Forced recalls	0	Not Applicable

5. Does the entity have a framework/policy on cyber security and risks related to data privacy?

If available, provide a web-link of the policy

https://www.rustomjee.com/about-us/codes-and-policies/#investor-pdf-1

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.

We are pleased to report that all processes functioned as intended, and no corrective actions were required during this period.

7. Provide the following information relating to data breaches

a.	Number of instances of data breaches	0
b.	Percentage of data breaches involving personally identifiable information of customers	0%
C.	Impact, if any, of the data breaches	NIL

Leadership Indicators

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

Website, Brochures and Site Offices, Phone Calls, Whatsapp, Newspapers, Social Media

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

The company is not a manufacturing company and hence does not make consumer products that can be misused and therefore this requirement is not applicable to us. However, as our commitment to sustainability we ensure that our customers are made aware of all the initiatives taken by our company to provide homes that are complying to ESG requirements that are material to our industry.

- 3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.
- 4. Does the entity display product information on the product over and above what is mandated as per local laws?

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