



SH/XII/046/2026-27

01<sup>st</sup> July, 2026

Corporate Relationship Department  
**BSE Limited**  
1<sup>st</sup> Floor, Phiroze Jeejeebhoy Towers  
Dalal Street, Fort,  
Mumbai-400 001  
**Scrip Code: 500040**

Listing Department  
**National Stock Exchange of India Limited**  
Exchange Plaza, 5<sup>th</sup> floor,  
Bandra-Kurla Complex  
Bandra (East), Mumbai-400 051.  
**Scrip Code: ABREL**

Dear Sir/Madam,

**Sub: Business Responsibility and Sustainability Report FY 2025-26 of Aditya Birla Real Estate Limited ('the Company')**

**Ref: Regulations 34(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations')**

Pursuant to Regulation 34(2) of Listing Regulations, please find attached herewith the Business Responsibility and Sustainability Report for the financial year 2025-26 along with Independent Assurance Statement on BRSR core provided by TUV India Pvt Ltd, which forms part of the Integrated Annual Report for financial year 2025-26.

This is also being made available on the website of the Company i.e. [www.adityabirlarealestate.com](http://www.adityabirlarealestate.com)

This is for your information and record.

Thanking you,

Yours truly,  
For **ADITYA BIRLA REAL ESTATE LIMITED**  
(Formerly Century Textiles and Industries Limited)



**ATUL K. KEDIA**  
**Jt. President (Legal) & Company Secretary**

Encl: as attached

# BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

Aditya Birla Real Estate Ltd. ('ABREL' or 'The Company') presents its Business Responsibility and Sustainability Report (BRSR) for FY 2025–26, in accordance with Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The report is structured around the nine Principles of the National Guidelines on Responsible Business Conduct (NGRBC) and is independently assured by TUV India Private Limited.

ABREL, through its wholly owned subsidiary Birla Estates Pvt. Ltd. (BEPL), is among India's fastest-growing premium real estate developers. Its portfolio spans 21 projects across 35 million sq. ft. and a development pipeline valued at over ₹ 73,900 Crores. In FY 2025–26, the Company recorded a booking value of ₹ 8,136 Crores, reflecting

sustained execution momentum. Sustainability is embedded at every stage of this growth, from design through delivery, underpinned by the Aditya Birla Group's ('ABG' or 'The Group') net-zero ambition for 2050 and ABREL's alignment with the UN Sustainable Development Goals.

This BRSR highlights ABREL's achievements and acknowledges its journey ahead. Furthermore, the Company aligns with global frameworks, including the United Nations Sustainable Development Goals (UN SDGs) and ABG's net-zero ambition. Through this approach, it remains committed to transparent, accountable, and innovative practices that benefit both people and the planet.



## SECTION

## A

## GENERAL DISCLOSURES

## 1. Details of the listed entity

1.	Corporate Identity Number (CIN) of the listed entity	L17120MH1897PLC000163
2.	Name of the listed entity	Aditya Birla Real Estate Ltd. (formerly Century Textiles and Industries Ltd.)
3.	Year of incorporation	1897
4.	Registered office address	Century Bhavan, Dr. Annie Besant Road, Worli, Mumbai – 400 030
5.	Corporate address	Century Bhavan, Dr. Annie Besant Road, Worli, Mumbai – 400 030
6.	Email	abrel.info@adityabirla.com
7.	Telephone	022 2495 7000
8.	Website	www.adityabirlarealestate.com
9.	Financial year for which reporting is being done	1 <sup>st</sup> April, 2025 to 31 <sup>st</sup> March, 2026
10.	Name of the Stock Exchange(s) where shares are listed	<ul style="list-style-type: none"> <li>BSE Ltd.</li> <li>National Stock Exchange of India Ltd.</li> </ul>
11.	Paid-up capital	₹ 111.69 Crores
12.	Name and contact details (telephone, Email address) of the person who may be contacted in case of any queries on the BRSR report	Contact person: Mr. Shailendra Joshi Designation: Head of Environmental, Social, and Governance (ESG), Birla Estates Pvt. Ltd. (BEPL) Email: abrel.info@adityabirla.com Telephone: +91 22 2495 7000
13.	<b>Reporting boundary</b> – Are the disclosures under this report made on a standalone basis (i.e., only for the entity) or on a consolidated basis (i.e., for the entity and all the entities which form a part of its consolidated financial statements, taken together)	The disclosures in this report are presented on a consolidated basis for ABREL and BEPL including its wholly owned subsidiaries and joint venture. This comprehensive approach ensures a holistic view of ABREL's sustainability efforts across all sectors of its operation.  There are certain restatements due to changes in approach and methodology. The restated information has been denoted by (R#). The effects and reasons have been included under the respective Principles of this report. These restatements would enable consistency and comparability between the current and previous year's information.
14.	Name of assurance provider	TUV India Pvt. Ltd.
15.	Type of assurance obtained	Limited Assurance

**II. Products/services**

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

Description of main activity	Description of business activity	% of turnover of the entity
<p><b>1. Construction and development</b></p>	<p><b>Real Estate:</b> Birla Estates Pvt. Ltd., the Real Estate segment of ABREL, has established a significant footprint in the premium to ultra-luxury residential markets. This is complemented by commercial and retail ventures, including office spaces and retail outlets.</p> <p>The segment is actively expanding through strategic acquisitions of land parcels and alliances across major cities, demonstrating its firm commitment to excellence and versatility in real estate development. This aggressive expansion strategy underscores ABREL's dedication to continually enhancing its presence and offerings in the sector.</p>	<b>9.94%</b>
<p><b>2. Manufacturing</b></p>	<p><b>Pulp and Paper:</b> ABREL's manufacturing facility in Lalkuan, Uttarakhand, is known for its diverse production capabilities. It encompasses a wide array of paper products such as writing and printing paper, tissue paper, and paperboard.</p> <p>Additionally, the facility also houses a dedicated unit to produce raw materials essential for viscose filament yarn, staple fibre, and paper-grade pulp, facilitating a vertically integrated process. This approach boosts sustainability and drives innovation, thereby reinforcing ABREL's commitment to responsible manufacturing practices.</p>	<b>88.35%</b>

**17. Products/services sold by the entity (accounting for 90% of the entity's turnover):**

S. no.	Product/service	NIC Code	% of total turnover contributed
1.	<p><b>Real Estate:</b></p> <p>a. Leasing activity (real estate activity with owned or leased property) and sale of residential properties</p>	<b>6810</b>	<b>9.94%</b>
2.	<p><b>Pulp and Paper:</b></p> <p>a. Wood/bagasse/recycled paper</p> <p>b. Multilayer packaging board</p>	<b>1701, 1702, 1709</b>	<b>88.35%</b>



**III. Operations**

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

Location	Number of plants	Number of offices	Total
National	2*	17	19
International	0	0	0

\*This does not include plant location of Century Minerals and Chemicals and Century Rayon.

\*The information with respect to Century Minerals and Chemicals is minuscule and can be considered as not material for this reporting period.

\*With respect to Century Rayon, the Company has granted to Grasim Industries Ltd. (GIL) the right and responsibility to manage, operate, use, and control the viscose filament yarn business of Century Rayon Division of the Company for 15 years with effect from 1<sup>st</sup> February, 2018.

**19. Markets served by the entity**

**a. Number of locations**

Location	Number
National (no. of states)	36 (Pan India)
International (no. of countries)	25

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

Exports account for 4.75% of ABREL's total turnover.

**c. A brief on types of customers:**

**Real Estate:** The Real Estate segment primarily caters to customers seeking high-end residential developments that offer luxurious and comfortable living spaces. It also serves business clients through the ownership, operation, and leasing of premium commercial properties. In addition, the segment aims to expand its operations and its portfolio through strategic development of land parcels and forming alliances in major urban centres.

**Pulp and Paper:** The Pulp and Paper segment serves a diverse array of industries, including major printing and publishing companies, packaging, pharmaceuticals, Fast-Moving Consumer Goods (FMCG), and Fast-Moving Consumer Durables (FMCD). By delivering high-quality paper products, this segment underpins the operations of these sectors, ensuring a reliable and efficient resource supply that facilitates innovation and growth within these industries.



**IV. Employees****20. Details as at the end of the financial year:****a. Employees and workers (including differently abled):**

S. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>Employees</b>						
1.	Permanent (D)	1,391	1,210	86.99	181	13.01
2.	Other than permanent (E)	150	132	88	18	12
3.	<b>Total employees (D + E)</b>	1,541	1,342	87.09	199	12.91
<b>Workers</b>						
4.	Permanent (F)	1,370	1,370	100	0	0
5.	Other than permanent (G)	3,928	3,925	99.92	3	0.08
6.	<b>Total workers (F + G)</b>	5,298	5,295	99.94	3	0.06

**b. Differently abled employees and workers:**

S. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>Differently abled employees</b>						
1.	Permanent (D)	1	1	100	0	0
2.	Other than permanent (E)	0	0	-	0	0
3.	<b>Total differently abled employees (D + E)</b>	1	1	100	-	-
<b>Differently abled workers</b>						
4.	Permanent (F)	5	5	100	0	0
5.	Other than permanent (G)	8	8	100	0	0
6.	<b>Total differently abled workers (F + G)</b>	13	13	100	-	0

**21. Participation/inclusion/representation of women**

	Total (A)	No. and percentage of females	
		No. (B)	% (B/A)
Board of Directors	8	3	37.50%
Key Management Personnel	3	0	0%

**22. Turnover rate for permanent employees and workers**

(Disclose trends for the past 3 years)

	FY 2025-26 (Turnover rate in current financial year)			FY 2024-25 (Turnover rate in previous financial year)			FY 2023-24 (Turnover rate in the year prior to the previous financial year)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent employees	12.28%	22.43%	13.54%	15.19%	8.37%	15.42%	33.10%	26.29%	32.58%
Permanent workers	7.64%	NA	7.64%	7.05%	NA	7.05%	62.93%	200.00%	64.59%

**V. Holding, subsidiary and associate companies (including joint ventures)****23. (a) Names of holding/subsidiary/associate companies/joint ventures:**

S. no.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/subsidiary/associate/joint venture	% of shares held by the listed entity	Does the entity indicated in column A participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Birla Estates Pvt. Ltd.	Wholly owned subsidiary	100	Yes. The Company's commitment to Business Responsibility initiatives is an integral part of its corporate philosophy. All its entities align closely with the parent entity and actively participate in these initiatives.
2	Vardhita Properties Pvt. Ltd. (formerly Birla Century Exports Pvt. Ltd.)	A Joint venture of BEPL	90	
3	Ekamaya Properties Pvt. Ltd.	Wholly owned subsidiary of BEPL	100	
4	Vypak Properties Pvt. Ltd.	Wholly owned subsidiary of BEPL	100	
5	Unnatam Properties Pvt. Ltd.	Wholly owned subsidiary of BEPL	100	
6	Tarusa Properties Pvt. Ltd.	Wholly owned subsidiary of BEPL	100	
7	Vibhavaya Properties Pvt. Ltd.	Wholly owned subsidiary of BEPL	100	
8	Isira Realcon Pvt. Ltd. (formerly Adyasha Properties Pvt. Ltd.)	Wholly owned subsidiary of BEPL	100	
9	Avarna Projects LLP	A subsidiary of BEPL	50*	
10	Birla Tisya LLP	A subsidiary of BEPL	40*	



S. no.	Name of the holding/subsidiary/ associate companies/joint ventures (A)	Indicate whether holding/subsidiary/associate/joint venture	% of shares held by the listed entity	Does the entity indicated in column A participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
11	Birla Arnaa LLP	A subsidiary of BEPL	47*	
12	Industry House Ltd.	Associate	35.28 <sup>^</sup>	
13	Birla Advanced Knits Pvt. Ltd.	Joint venture	50	
14	CTIL Community Welfare Foundation	Wholly owned subsidiary	100	

\*Consolidation of entities where the Group does not hold most of the voting rights (de facto control): The Group has consolidated the LLPs as subsidiaries under Ind AS-110, despite holding 50% or less of the voting rights in the LLPs. This is because the Group controls all relevant decisions regarding the operation of these entities.

<sup>^</sup>Investments in Industry House Ltd. (IHL) are among the unquoted investments. The Company holds 35.28% of IHL's equity shares. In line with Ind AS-28, 'Investments in Associates and Joint Ventures,' the Company has not regarded IHL as an associate and has not consolidated it, as it does not have a substantial amount of influence over the Company. Moreover, ABREL's share of IHL's profits is negligible

## VI. CSR Details:

24.

### (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)

Yes. Corporate Social Responsibility (CSR) is applicable as per Section 135 of the Companies Act, 2013.

### (ii) Turnover (in ₹)

3,466.31 Crores

### (iii) Net worth (in ₹)

3,699.20 Crores

## VII. Transparency and disclosure compliances


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

Stakeholder group from whom complaint is received	Grievance redressal mechanism in place (Yes/No) (If yes, then provide weblink for grievance redress policy)	FY 2025-26 (current financial year)			FY 2024-25 (previous financial year)		
		Number of complaints filed during the year	Number of complaints with pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints with pending resolution at close of the year	Remarks
Communities	Yes. ABREL maintains structured community grievance mechanisms at all project sites. This includes periodic meetings with community representatives, complaint drop boxes at site entrances, a maintained log of all complaints received, and a designated responsible individual for timely resolution.	0	0	-	0	0	-

Stakeholder group from whom complaint is received	Grievance redressal mechanism in place (Yes/No) (If yes, then provide weblink for grievance redress policy)	FY 2025-26 (current financial year)			FY 2024-25 (previous financial year)		
		Number of complaints filed during the year	Number of complaints with pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints with pending resolution at close of the year	Remarks
Shareholders/ investors	Yes. ABREL provides shareholders and investors with direct access through a dedicated helpline, a designated investor relations Email (ctil.investorrelations@adityabirla.com), and regular one-on-one and group engagements. The investor relations team manages all queries, complaints, and grievances, ensuring timely response and resolution.	11	1	Complaint is in the process of resolution	16	0	-
Employees and workers	Yes. Employees may raise concerns through suggestion and complaint boxes at office premises, an anonymous ethics helpline, or directly with the Ethics and Vigilance Officer. The HR department and relevant internal committees serve as additional points of contact. All matters are handled confidentially and in accordance with the Company's grievance redressal framework.	2	1	The cases pertain to POSH-related case across ABREL	1	0	-
Customers	Yes. The marketing teams of the respective business units play a crucial role in promptly addressing customer complaints and feedback. Upon receiving a complaint, they act proactively to resolve the issue. This may involve scheduling meetings at the customer's site, engaging via phone calls, or communicating through messages, depending on the type of concern.	11	22	Consumer grievances related to bookings, refunds, allotments, amenities, and forfeiture of earnest money are pending before the Consumer Redressal Forum	4	15	-
Value chain partners	Yes. The CRM and legal teams of respective business units manage customer complaints, with resolution facilitated through site visits, calls, or written communication depending on the nature of the concern. Procurement teams across business units address concerns raised by value chain partners through structured follow-ups, including meetings, calls, and written communication as appropriate.	0	0	-	0	0	-

**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:



**Material issue identified**  
**Business Ethics**

**1**

**Indicate whether risk or opportunity (R/O)**  
**R**

**Rationale for identifying the risk/opportunity**

Regulatory and enforcement scrutiny of the real estate sector intensified in FY 2025–26. The Supreme Court reaffirmed SFIO's non-bailable arrest powers under Section 447 of the Companies Act, and SEBI's LODR amendments (March and November 2025) tightened norms on board independence, related-party transaction materiality, and audit committee oversight.

Continued enforcement action against sector peers underscores the heightened legal, financial, and reputational consequences of any ethical lapse, particularly in the luxury segment, where brand trust is central to purchase decisions.

**In case of risk, approach to adapt or mitigate**


- Maintaining a Code of Conduct, covering employees, leadership, and business associates
- Reinforcing ethical decision-making through regular training
- Enabling secure reporting through a confidential whistleblower mechanism with protection against retaliation
- Conducting independent compliance oversight through internal audits and risk assessments to address emerging governance risks
- Continuously updating policies to align with evolving SEBI LODR obligations

**Financial implications of the risk or opportunity (indicate positive or negative implications)**

Negative:

Ethical lapses or regulatory non-compliance can result in monetary penalties, enforcement action, and litigation costs under applicable corporate, securities, and sectoral laws. Beyond direct financial exposure, reputational damage in the luxury segment can adversely impact pre-sales velocity, pricing power, and access to capital.





**Material issue identified**  
**Data Privacy and Cybersecurity**

**2**

**Indicate whether risk or opportunity (R/O)**  
**R**

**Rationale for identifying the risk/opportunity**

The 'Digital Personal Data Protection Rules, 2025' was gazetted on 13<sup>th</sup> November, 2025, establishing a hard compliance deadline of 13<sup>th</sup> May, 2027 and penalty ceilings of ₹ 250 Crores for security-safeguard failures. Concurrently, the Data Protection Board of India is being constituted to further strengthen the framework.

At the same time, cyber risks in India continue to intensify, with the country recording an average of 2,011 cyberattacks per week in 2025 (Check Point Research). The November 2025 Adda.io breach leaked 1.86 million users' government IDs from a housing-society management platform, directly illustrating real-estate sector exposure.

**In case of risk, approach to adapt or mitigate**

- Conducting regular employee training on phishing and social-engineering threats
- Upgrading IT infrastructure through enhanced firewalls and security patching
- Maintaining a dedicated cybersecurity monitoring and incident-response function
- Advancing DPDP Rules 2025 readiness, including personal data-flow mapping, breach-notification protocols, and review of third-party data-processor agreements

**Financial implications of the risk or opportunity (indicate positive or negative implications)**

Negative:

The DPDP Act, 2023 prescribes financial penalties of up to ₹ 250 Crores for failure to implement reasonable security safeguards and up to ₹ 200 Crores for failure to notify personal data breaches. Compliance also entails investment in governance frameworks, technology infrastructure, and capability building. Operational disruptions arising from cyber incidents or data breaches can delay project registrations, customer onboarding, and collections, in addition to attracting regulatory and reputational consequences.



**Material issue identified**  
**Occupational Health and Safety**

**3**

**Indicate whether risk or opportunity (R/O)**  
**R**

**Rationale for identifying the risk/opportunity**

The implementation of the four Labour Codes, effective 21<sup>st</sup> November, 2025, marks the most significant overhaul of India's occupational health and safety regime in decades. The Draft Central Rules, notified on 30<sup>th</sup> December, 2025, are expected to be operationalised in a phased manner.

The Code introduces stricter site-safety obligations, mandatory annual health check-ups for workers above 40, enhanced penalties for repeat violations, and broader employer liability for contract and migrant workers. These measures are relevant to the construction sector that remains among the most hazardous in India, with industry studies consistently identifying it as a leading contributor to occupational fatalities.



**In case of risk, approach to adapt or mitigate**

- Fostering a zero-incident culture through an ISO 45001:2018-certified OHSMS across the Pulp and Paper division, with the Real Estate certification in progress
- Conducting daily toolbox meetings to address site-specific hazards
- Undertaking quarterly internal and annual external safety audits to ensure evolving compliance
- Deploying HIRA, JSA, and Behaviour-Based Safety Operations across all active project sites

**Financial implications of the risk or opportunity (indicate positive or negative implications)**

Negative:

Safety lapses can result in significant financial exposure across multiple channels. The OSH Code, 2020, prescribes monetary penalties and imprisonment for contraventions, with enhanced consequences for repeat offences and incidents involving fatalities or serious injuries. Compensation liabilities arise under the Employees' Compensation Act, 1923, and through civil claims, with quantum determined by statutory formulae and judicial precedent. Indirect costs include workers' compensation insurance premium revisions, project stoppages and consequent schedule overruns, and increased financing costs.

4



**Material issue identified**  
**Compliance**

**Indicate whether risk or opportunity (R/O)**  
**R**

**Rationale for identifying the risk/opportunity**

The regulatory landscape for real estate continued to evolve significantly in FY 2025–26, with RERA authorities intensifying enforcement through suo motu actions on advertisement and disclosure non-compliance, broker deregistration drives, and integration of planning authorities for digital verification of project approvals.

The Construction & Demolition Waste Management Rules, 2025, introduced Extended Producer Responsibility obligations for larger projects. Meanwhile, SEBI's amendments to the LODR Regulations recalibrated norms on related-party transactions, board independence, and audit-committee oversight.

Further, the four Labour Codes, effective November 2025, require fresh compliance mapping across HR and contractor management. Also, the concurrent expansion of government-supported housing finance schemes has introduced additional conditionality for participating developers.

Cumulatively, these developments raise the bar on compliance infrastructure, monitoring, and reporting, with non-adherence carrying regulatory, financial, and reputational consequences.

**In case of risk, approach to adapt or mitigate**

- Revising compliance checklists periodically to incorporate evolving regulatory demands and industry best practices
- Conducting concurrent audits and process monitoring during project execution to proactively identify compliance gaps
- Developing segment-specific regulatory checklists in the Real Estate business, verified by relevant stakeholders
- Documenting and reviewing compliance data quarterly at the Head Office, with discussions at the Audit Committee and Board level to ensure top-level oversight

**Financial implications of the risk or opportunity (indicate positive or negative implications)**

Negative:

Regulatory violations can lead to substantial fines, legal penalties, project delays, and reputational risks. Non-compliance may also impact market positioning, investor confidence, and long-term financial stability.

5



**Material issue identified**  
**Corporate Governance**

**Indicate whether risk or opportunity (R/O)**  
**R**

**Rationale for identifying the risk/opportunity**

The corporate governance framework for listed entities continued to tighten in FY 2025–26 through successive amendments to SEBI's Listing Obligations and Disclosure Requirements (LODR) Regulations. Key changes strengthened norms on board composition, director appointments and vacancy timelines, and recalibrated the materiality framework for related-party transactions supported by a scale-based mechanism with enhanced audit committee oversight of subsidiary-level transactions.

At the same time, governance quality is increasingly being benchmarked through public scoring by proxy advisors, ESG rating providers, and institutional investors, drawing substantially on public disclosures. Any lapse in governance standards or disclosures can carry regulatory, reputational, and capital-market consequences, particularly material for listed real estate developers, where institutional investor confidence and brand trust are central to capital access and customer decisions.

**In case of risk, approach to adapt or mitigate**

- Maintaining a strong and independent Board with a focus on diversity and unbiased decision-making
- Implementing a strong risk management framework proactively to identify governance-related risks
- Strengthening Board committee oversight of sustainability, financial performance, and regulatory compliance
- Ensuring transparent communication with investors, employees, and communities to reinforce accountability
- Reviewing LODR amendment implications on an ongoing basis to ensure timely policy alignment

**Financial implications of the risk or opportunity (indicate positive or negative implications)**

Negative:

Governance lapses can attract SEBI adjudication orders and monetary penalties, alongside trading restrictions for serious breaches. Indirect consequences include adverse proxy advisor recommendations, lower ESG and governance ratings, reduced institutional investor confidence, and increased cost of capital. With governance disclosures forming a direct input into publicly available ratings, any lapse can affect investor sentiment and access to sustainability-linked capital, particularly material in the premium and luxury segment, where institutional confidence underpins both capital access and brand trust.



6



Material issue identified

**Environment, Social, Governance (ESG) Incident and Risk Management**

Indicate whether risk or opportunity (R/O)

**R**

**Rationale for identifying the risk/opportunity**

The ESG regulatory and disclosure landscape continued to deepen in FY 2025–26. SEBI's BRSR framework progressed through phased expansion of BRSR core assurance, value-chain disclosures, and green-credit indicators. Meanwhile, the formalisation of the ESG Rating Provider framework introduced structured oversight of ESG ratings issued in India.

Globally, third-party benchmarks such as GRESB, CDP, and DJSI continue to set the bar for the real estate sector. Any ESG incident is now recorded in third-party ratings that directly influence institutional capital allocation, lender appetite, and customer perception, making verified ESG performance both a compliance imperative and a strategic differentiator.

**In case of risk, approach to adapt or mitigate**

- Integrating risk identification, impact assessment, and mitigation across business verticals under the oversight of the Risk Management Committee
- Proactively identifying and escalating within each business unit
- Aligning with SEBI BRSR Core requirements including the updated assessment or assurance framework
- Conducting regular ESG audits and GRESB participation to uphold transparency
- Implementing ISO 14001:2015 Environment Management Systems, with certification already in place for the Pulp and Paper division and for Real Estate.

**Financial implications of the risk or opportunity (indicate positive or negative implications)**

Positive:

Strong ESG governance unlocks green bond pricing 30–50 bps below vanilla corporate bonds and supports premium valuations in the luxury residential segment.

Negative:

Inadequate ESG risk management increases borrowing costs and constrains access to green financing.

7



Material issue identified

**Customer Experience and Satisfaction**

Indicate whether risk or opportunity (R/O)

**O**

**Rationale for identifying the risk/opportunity**

Delivering an exceptional customer experience remains a key differentiator in the competitive real estate sector. Proactive engagement, personalised service, and seamless interactions help strengthen brand loyalty, boost retention, and enhance the Company's reputation. In an era where digital touchpoints and customer feedback significantly influence purchasing decisions, maintaining high satisfaction levels is critical for sustained growth.

**In case of opportunity, approach to adapt or mitigate**

- Strengthening digital platforms for real-time support and feedback integration
- Enhancing customer insights using NPS, CSAT, and data analytics
- Streamlining service processes with AI-driven tools and automation
- Prioritising post-sale engagement to build long-term relationships
- Implementing ISO 9001:2015 Quality Management Systems, with certification already in place for the Pulp and Paper division and for Real Estate

**Financial implications of the risk or opportunity (indicate positive or negative implications)**

Positive:

Enhanced customer satisfaction drives higher retention rates, repeat business, and positive brand perception, leading to increased revenue and stronger market positioning. Proactive OC-compliance eliminates the provisioning risk created by the NCDRC's October 2025 ruling.

8



Material issue identified

**Brand Management**

Indicate whether risk or opportunity (R/O)

**O**

**Rationale for identifying the risk/opportunity**

Brand strength continues to translate directly into commercial outcomes for ABREL. The 24-hour sell-out of Birla Arika (Gurugram), generating approximately ₹ 1,850 Crores in pre-sales, demonstrates the price-and-velocity premium that a trusted brand commands in the premium and luxury segment. This is reinforced by ABREL's strong FY 2025–26 pre-sales performance and its established position in India's pre-sales league table.

Meanwhile, sustained brand-building investments and high-visibility marketing activations continue to deepen consumer recall and drive site-visit traction. With ultra-luxury micro-markets such as Worli witnessing significant price appreciation and a concentrated share of top transactions, brand equity is a defining lever of pricing power, capital efficiency, and long-term value creation in the listed Real Estate sector.



**In case of opportunity, approach to adapt or mitigate**

- Investing in brand-building through digital marketing, ESG-driven storytelling, strategic partnerships including IPL sponsorship, and consistent messaging
- Utilising customer insights to refine marketing strategy and leveraging the Group's 125-year heritage for institutional credibility in the luxury segment

**Financial implications of the risk or opportunity (indicate positive or negative implications)**

## Positive:

A strong brand reputation leads to higher customer retention, premium pricing, increased investor confidence, and long-term revenue growth, enhancing market valuation and competitive positioning.

9



Material issue identified

**Energy and Emission Management (Decarbonisation)**

Indicate whether risk or opportunity (R/O)

**R****Rationale for identifying the risk/opportunity**

The real estate and manufacturing sectors are among the major contributors to global energy consumption and greenhouse gas (GHG) emissions. As environmental regulations tighten and stakeholders demand greater sustainability, companies must actively manage their carbon footprint to mitigate legal, financial, and reputational risks. Aligning with global sustainability goals, including achieving net-zero emissions, is becoming imperative for long-term competitiveness.

**In case of risk, approach to adapt or mitigate**

- Aligning ABREL's decarbonisation strategy with ABG's Net-Zero 2050 target

**Real Estate:**

- Conducting climate risk assessments across multiple projects, embodied carbon assessments, LEED and IGBC certifications across almost all projects (Birla Niyaara holds India's first residential LEED Platinum pre-certification and BREEAM certification, the only Indian project to hold this certification)
- Integrating energy-efficient design with advanced HVAC and BAS, GGBS-based concrete and FSC-certified wood, and rooftop solar integration

**Pulp and Paper:**

- Replacing conventional fuels with black liquor, bark, pith, bioenergy, and CMG
- Reducing value-chain emissions through FSC-certified sourcing

**Financial implications of the risk or opportunity (indicate positive or negative implications)**

## Positive:

Green-certified assets typically command rental and price premiums over comparable non-certified assets, while energy-efficient design reduces lifecycle operating costs for residents and tenants. Sustainability-linked loans, green bonds, and other thematic financing instruments are progressively offering preferential pricing and broader investor access, supporting both capital efficiency and ESG positioning.

## Negative:

Tightening climate regulation and the phased operationalisation of India's carbon market are expected to increase the cost of high-emission inputs such as cement and steel over time, with consequent impact on construction costs. Rising energy tariffs, evolving energy-efficiency norms under the Energy Conservation and Sustainable Building Code, and customer expectations of low-operating-cost homes also add to operational and capital expenditure pressures.

10



Material issue identified

**Water and Wastewater Management**

Indicate whether risk or opportunity (R/O)

**R****Rationale for identifying the risk/opportunity**

Efficient water management is vital for business continuity and regulatory compliance, particularly in water-intensive sectors like Pulp and Paper and during construction activities in Real Estate. Poor management can result in higher operational costs, regulatory penalties, and reputational risks. In parallel, increasing regulatory scrutiny and environmental concerns necessitate responsible water use and wastewater treatment to ensure compliance and sustainable operations.

**In case of risk, approach to adapt or mitigate****Real Estate**

- Integrating water-efficient technologies and wastewater recycling systems to reduce water footprint during construction and in completed projects

**Pulp and Paper**

- Focusing on reducing water consumption and enhancing water recycling through process optimisations and wastewater treatment improvements

**Regulatory Compliance**

- Ensuring strict adherence to water usage and discharge norms through continuous monitoring and audits

**Financial implications of the risk or opportunity (indicate positive or negative implications)**

## Negative:

Inefficient water management can increase operational costs, result in fines for non-compliance, and impact project timelines and profitability.



**Material issue identified**  
**Waste Management**

Indicate whether risk or opportunity (R/O)

**R**

**Rationale for identifying the risk/opportunity**

The Environment (Construction and Demolition) Waste Management Rules, 2025, notified by the Ministry of Environment, Forest and Climate Change, and enforceable from 1<sup>st</sup> April, 2026, mark the significant overhaul of India's C&D waste regime in nearly a decade. For the first time, the rules introduce, an Extended Producer Responsibility (EPR) framework for projects above 20,000 sqm built-up area. The key requirements include mandatory registration on the CPCB's centralised portal, a graduated recycling schedule rising progressively to 100% over four years, and parallel targets for the use of recycled materials in new construction.

India generates a substantial volume of C&D waste annually, of which only a small fraction is currently processed. At the same time, pollution-control authorities are intensifying enforcement on construction-phase dust and waste management. Consequently, any non-registration, target shortfall, or operational lapse can result in environmental compensation, regulatory action, and reputational consequences across the project pipeline.

**In case of risk, approach to adapt or mitigate**

**Real Estate**

- Deploying organic waste converters at commercial sites and provisions for residential sites to convert organic waste into manure
- Using recycled concrete aggregates and repurposing construction and demolition waste into paver blocks for onsite use

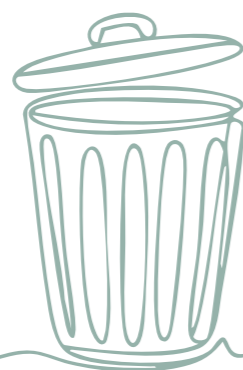
**Compliance and Monitoring**

- Conducting regular audits and ensuring adherence to waste disposal and recycling regulations to prevent legal and environmental risks

**Financial implications of the risk or opportunity (indicate positive or negative implications)**

Negative:

Non-compliance with the C&D Waste Management Rules, 2025, can result in environmental compensation, regulatory action, and project-level disruption, risks that scale across the pipeline given the broad applicability of the Rules to projects above 20,000 sqm. Parallel exposure exists under pollution-control regulations governing construction-phase dust and waste.



**SECTION**

**B**

**MANAGEMENT AND PROCESS DISCLOSURES**

This section is aimed at helping businesses demonstrate the structures, policies, and processes put in place towards adopting the NGRBC Principles and Core Elements.

**Disclosure Questions**

- P1
- P2
- P3
- P4
- P5
- P6
- P7
- P8
- P9

**Policy and management processes**

<b>1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)</b>	Yes
<b>b. Has the policy been approved by the Board? (Yes/No)</b>	Yes
<b>c. Weblink of the policies, if available**</b>	ABREL's policy framework governs responsible business conduct across its operations, covering both enterprise-wide policies applicable to all functions and topic-specific policies relevant to its Real Estate business. The policies are reviewed periodically to ensure continued relevance, regulatory alignment, and operational effectiveness. Key policies are publicly accessible on the Company's website. Select internal policies applicable to employees are available on the Company intranet. Policies, Codes and Others are available on: <a href="https://www.adityabirlarealestate.com/corporate-governance">https://www.adityabirlarealestate.com/corporate-governance</a>
<b>2. Whether the entity has translated the policy into procedures. (Yes/No)</b>	Yes
<b>3. Do the enlisted policies extend to your value chain partners? (Yes/No)</b>	Yes
<b>4. Name of the national and international codes/certifications/labels/standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustae) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity mapped to each principle.</b>	

**P1**

In alignment with Principle 1, ABREL complies with these regulatory and quality management standards to uphold governance and operational excellence:

- Provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
- Quality Management System (ISO 9001:2015)



Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>P2</b>	To fulfil the environmental stewardship goals of Principle 2, ABREL adheres to the following internationally recognised environmental, safety, and sustainability certifications: <ul style="list-style-type: none"> <li>Environmental Management System (ISO 14001:2015)</li> <li>Quality Management System (ISO 9001:2015)</li> <li>Occupational Health and Safety Management Systems (ISO 45001:2018)</li> <li>BREEAM (Building Research Establishment Environmental Assessment Method)</li> <li>LEED (Leadership in Energy and Environmental Design)</li> <li>Indian Green Building Certification (IGBC)</li> <li>GRESB (Global Real Estate Sustainability Benchmark)</li> </ul>									
<b>P3</b>	Reflecting the focus of Principle 3 on occupational health and integrated reporting, the Company follows these key standards and frameworks: <ul style="list-style-type: none"> <li>Occupational Health and Safety Management System (ISO 45001:2018)</li> <li>The International Integrated Reporting Council (IIRC) Framework</li> </ul>									
<b>P4</b>	Consistent with Principle 4, ABREL meets its CSR obligations through adherence to the following statutory guideline: <ul style="list-style-type: none"> <li>CSR disclosures under Section 135 of the Companies Act, 2013, read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended</li> </ul>									
<b>P5</b>	Aligning with the Principle 5 requirements, ABREL is committed to upholding human rights across its operations and value chain by adhering to key Indian laws related to fair treatment, workplace safety, and non discrimination. These also include legislations such as the Factories Act, Code on Wages, and the POSH Act, among others. Implementation is driven through robust internal policies, a supplier code of conduct, awareness programmes, and effective grievance redressal mechanisms ensuring a safe, inclusive, and respectful work environment for all employees and workers. Additionally, the Real Estate division has a dedicated human rights policy and related considerations are factored into business contracts as well.									
<b>P6</b>	For Principle 6, which emphasises sustainable operations, ABREL integrates the following environmental and safety management systems and certifications: <ul style="list-style-type: none"> <li>Environmental Management System (14001:2015)</li> <li>Occupational Health and Safety Management System (45001:2018)</li> <li>LEED (Leadership in Energy and Environmental Design)</li> <li>Indian Green Building Certification</li> <li>GRESB</li> <li>BREEAM</li> <li>Forest Stewardship Council (FSC)</li> </ul>									



Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>P7</b>	In line with Principle 7's emphasis on integrated reporting and sustainable development goals, the Company aligns with these global frameworks: <ul style="list-style-type: none"> <li>IIRC Framework</li> <li>UN SDGs</li> </ul>									
<b>P8</b>	To address the community and stakeholder engagement aspects under Principle 8, ABREL complies with these CSR disclosure requirements and reporting frameworks: <ul style="list-style-type: none"> <li>CSR disclosures under Section 135 of the Companies Act, 2013, read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended</li> <li>IIRC Framework</li> </ul>									
<b>P9</b>	Aligned with Principle 9, the Company maintains adherence to the following quality management standard to ensure continuous improvement and accountability: <ul style="list-style-type: none"> <li>Quality Management System (ISO 9001:2015)</li> <li>Information Security Management Systems (ISO/IEC 27001)</li> </ul>									
<b>5. Specific commitments, goals, and targets set by the entity with defined timelines, if any.</b>	<p><b>Environment</b></p> <ul style="list-style-type: none"> <li>Achieve net zero carbon emissions by 2050, in alignment with the Aditya Birla Group's climate ambition</li> <li>Formalise SBTi commitment to anchor near-term decarbonisation targets to a science-aligned pathway</li> <li>Maintain 100% green building certification (IGBC/LEED) across all ongoing and upcoming projects on a rolling basis</li> <li>Conduct Supplier Environment Assessments across the value chain</li> <li>Achieve IGBC Net Zero Waste certification for commercial properties, subject to ongoing feasibility assessment</li> <li>Progress towards Zero Liquid Discharge across all operational commercial assets</li> <li>Ensure 100% Biodiversity Assessment for all our projects</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>Improve gender diversity ratios across all functions, supported by structured DEI initiatives under BE ASTRA, ABREL's women's resource group focused on mentorship, skill-building, and leadership development</li> <li>Sustain and expand employee wellbeing programmes including MITR and the Mental Health Champion Programme, ensuring a psychologically safe and resilient workplace</li> <li>Continue to build internal capability through structured L&amp;D platforms including Gyanodaya, Mission Everest, and the annual Learning Fest, with a target of sustained training coverage across employees and workers</li> <li>Expand CSR initiatives year-on-year to increase beneficiary reach and deepen measurable community impact</li> </ul>									

## Disclosure Questions

P1 P2 P3 P4 P5 P6 P7 P8 P9

- Strengthen responsible procurement practices and value chain partner engagement to embed ethical sourcing standards across all operations

**Governance**

- Develop and implement ESG policies across all material topics identified through the Company's Stakeholder Engagement and Materiality Assessment (SEMA), with defined ownership and timelines for each policy
- Align with SEBI BRSR Core disclosure and assurance requirements, mandatory for the top 500 listed companies from FY 2025–26 onwards
- Sustain and improve GRESB scores across the residential and standing investment portfolios, building on the residential score of 100 achieved in FY 2025–26, and closing the gap to top-scoring peers globally

ABREL is diligently evaluating its operational and business-specific targets, and proactively setting more precise and quantifiable objectives. This strategic approach ensures that the Company's commitments translate into measurable and sustainable outcomes, driving meaningful progress across all areas of operation.

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

**Environment**

- Renewable energy utilisation:
  - o 100% of the commercial portfolio is powered with renewable energy for own operations
  - o Total grid electricity consumption across both operations reduced by 45% YoY with renewable electricity accounting for 32% of total electricity consumption
  - o A 140 kW on-site solar plant installed at Birla Centurion became operational
- Emissions and energy efficiency:
  - o Achieved reduction of 5.26% in Scope 1 emissions at a consolidated level while Scope 2 emissions reduced by a significant 53% YoY
  - o Use of renewable electricity has directly resulted in avoiding Scope 2 emissions amounting to 4247 tCO<sub>2</sub>e
  - o Generated 6,286,054 GJ of energy using biomass-based fuels at Pulp and Paper segment, resulting in significant emission reductions
  - o Implementing several key energy efficiency initiatives across various projects and commercial assets in the Real Estate division, leading to reduced emission intensity across operations



## Disclosure Questions

P1 P2 P3 P4 P5 P6 P7 P8 P9

- Water Management:
  - o Reduced total water withdrawal by 1.36% YoY and groundwater withdrawal by 2% YoY at a consolidated level
  - o Reduced water discharge by 2% YoY at a consolidated level
  - o Lowered overall water consumption by 0.1% compared to the previous reporting period at a consolidated level
  - o Groundwater withdrawal in water-stressed areas reduced by 23.32%
  - o Achieving zero wastewater discharge for operations in water-stressed areas and at Birla Centurion, which operates as a Zero Liquid Discharge (ZLD) facility
  - o Implementing rainwater harvesting at commercial and residential projects
- Waste Management and Biodiversity:
  - o Total waste diverted from disposal rose by 19% YoY to 3,44,889.50 MT with total waste generated rising by 17.79% YoY
  - o Waste disposal to landfilling reduced by 6.70% compared to the previous year
  - o 100% of E-waste and battery waste recycled through authorised vendor partnerships
  - o 100% plastic waste was managed through authorised vendors in compliance with Extended Producer Responsibility (EPR) requirements at a consolidated level
  - o 99.60 MT of construction and demolition (C&D) waste reused within operations
  - o The Real Estate division's biodiversity policy requires minimum 80% native species for green cover across all projects
  - o As part of pre-construction activities in the Real Estate division, biodiversity assessment is conducted for 100% of the projects
  - o 2.22 Crores saplings planted through the Social Forestry Initiative of the Pulp and Paper division

**Social**

- Women's representation in leadership stands at 37.5%, i.e., 3 out of 8 Board Directors are women
- Support extended to 58,433 beneficiaries through ABREL's CSR initiatives
- 94.32% employees while 73.39% of workers trained on skill upgradation. Moreover, 94.83% employees and 66.79% workers received training of health and safety measures
- Turnover rate for permanent employees and workers reduced to 13.54% as compared to 14.45% in the previous year
- Training on human rights was provided to 63% of all employees as well as 3% of total workers across the organisation

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Governance</b>									
<ul style="list-style-type: none"> <li>Maintenance of zero complaints and no data breaches, demonstrating a strong commitment to data security and privacy</li> <li>Initiated the process of Environmental Due Diligence for suppliers in the Real Estate division</li> </ul>									
<b>Governance, leadership, and oversight</b>									
<b>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)</b>									
Please refer to the message from the Managing Director (MD) on page 12 of this Integrated Annual Report for further details.									
<b>8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy/policy(ies).</b>									
The highest authority responsible for implementing and overseeing the ESG-related Business Responsibility policies is Mr. R.K. Dalmia, Managing Director of ABREL.									
<b>9. Does the entity have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes/No). If yes, provide details.</b>									
Yes. The 'Risk Management Committee' is responsible for overseeing the Company's approach to sustainability-related matters. The Committee meets bi-annually to ensure continued focus on sustainability initiatives. Its members are: Mr. Sunirmal Talukdar, Chairman Mr. Pramod Kabra Ms. Sukanya Kripalu Mr. Rajendra Kumar Dalmia									

**10. Details of Review of NGRBCs by the Company:**

Subject for review	Indicate whether review was undertaken by Director/Committee of the Board/any other Committee	Frequency (annually/half-yearly/quarterly/any other – please specify)
	P1 P2 P3 P4 P5 P6 P7 P8 P9	P1 P2 P3 P4 P5 P6 P7 P8 P9
Performance against the above policies, and follow-up actions	Yes	Annually
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Yes	Annually



Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>11. Has the entity carried out independent assessment/evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide details.</b>									
									No
<b>12. If answer to question (1) above is 'No' i.e., not all Principles are covered by a policy, reasons to be stated:</b>									
<b>Questions</b>									
The entity does not consider the Principles material to its business (Yes/No)									
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									NA as all principles are addressed within the respective policies.
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									



SECTION

C

PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorised as 'Essential' and 'Leadership'. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

PRINCIPLE 1

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

NGRBC Principle 1 requires businesses to conduct themselves with integrity, in a manner that is ethical, transparent, and accountable, and to keep stakeholders informed of their compliance with applicable laws and guidelines.

ABREL operationalises this commitment through a Board-approved Code of Conduct applicable to directors, senior management, and all employees, an anti-corruption and anti-bribery framework, including a dedicated Anti-Money Laundering and Anti-Bribery and Corruption Policy (AML & ABAC Policy) adopted for its Real Estate division, which prevents involvement in bribery, facilitation payments, corruption, or money laundering

and structured training programmes covering ethical practices and compliance obligations. In FY 2025-26, the Company continued to strengthen its governance infrastructure, including mechanisms for whistleblower protection and grievance redressal, with employees encouraged to raise concerns to the Compliance Officer or the Values Standing Committee with explicit protection against retaliation. ABREL's approach to Principle 1 aligns with SDG 16 (Peace, Justice and Strong Institutions) and SDG 17 (Partnerships for the Goals), reinforcing the Company's broader commitment to responsible and accountable business conduct.

SDG Linkages



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	% of persons in respective category covered by the awareness programmes
Board of Directors	1	The Company conducted a programme to brief the Board of Directors on the highlights of the Real Estate business, including the Company's geographical presence, opportunity in redevelopment market, customer-centricity, construction qualities, safety norms, environment protection measures, and brand value.	100%
Key Managerial Personnel (KMPs)	1	The Company organised an awareness programme for its KMPs on matters related to digital privacy law, cybersecurity, changes in provisions for related party transactions, and recent amendments to the SEBI (LODR) Regulations, 2015.	100%
Employees other than BoD and KMPs*	186	Trainings at the Pulp and Paper division were provided on all 9 NGRBC principles, while for the Real Estate division, principles 1, 3 and 6 were covered.	67.79%
Workers*	23	Trainings at the Pulp and Paper division covered all 9 NGRBC principles.	9.78%

\*Only Permanent employees and workers have been considered for the respective categories.

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? (Yes/No)
Penalty/fine	Principle 1	Professional Tax Officer, Government of Karnataka (Commercial Taxes Department)	3,36,214	Birla Estates Pvt. Ltd. (BEPL) had failed to enrol/register under the KTPTC & E Act 1976 and defaulted to pay the PT deducted from the salary/remuneration paid to employees/annual PT of the Company along with branches for Bengaluru region for the period from April 2019 to August 2024 for Bengaluru region.	No



Monetary					
	NGRBC Principle	Name of the regulatory/enforcement agencies/judicial institutions	Amount (in ₹)	Brief of the case	Has an appeal been preferred? (Yes/No)
Penalty/fine		Deputy Commissioner, Division-6, Gujarat	10,000	Minor discrepancy in E-way bill generation	No
		BSE Ltd.	11,800	Delayed compliance with regard to submission of notice of record date under Regulation 60(2) of SEBI (LODR) Regulations, 2015 by step down subsidiaries of the Company.	No
		Additional Commissioner (CGST & C. Ex.), Office of the Commissioner of CGST & Central Excise, Mumbai Central, Mumbai	23,96,415	An Order has been passed in the matter involving alleged ineligible Input Tax Credit availed pertaining to the FY 2019-20	Yes
Stamp duty		Hon'ble Court of Revenue Board, Madhya Pradesh, Gwalior	4,85,07,814	Alleged short payment of stamp duty on the execution of Agreements for Transfer of Undertakings viz. Century Yarn and Denim Units on the grounds of undervaluation of land and non-payment of stamp duty on plant and machineries under the Indian Stamp Act, 1899	Yes
Settlement	-	-	-	-	-
Compounding fee	-	-	-	-	-

Non-monetary				
	NGRBC Principle	Name of the regulatory/enforcement agencies/judicial institutions	Brief of the case	Has an appeal been preferred? (Yes/No)
Imprisonment	-	-	NA	NA
Punishment	-	-	NA	NA

**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
An Order has been passed in the matter involving alleged ineligible Input Tax Credit availed pertaining to the FY 2019-20.	The Company will contest the said additional demand by filing an appeal with the appellate authority.
Alleged short payment of stamp duty on the execution of agreements for the transfer of undertakings, namely the Century Yarn and Denim Units, on the grounds of undervaluation of land and non-payment of stamp duty on plant and machinery under the Indian Stamp Act, 1899.	The Company will contest the case by filing an appeal with the appellate authority.

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

Yes, ABREL maintains a firm commitment to integrity and ethical business practices through its comprehensive Code of Conduct, applicable to the Board, senior management, and all employees. This code underscores the importance of ethics, integrity, and honesty, offering clear guidance on handling ethical dilemmas, mechanisms for reporting unethical behaviour, and nurturing a culture of accountability throughout the organisation. Additionally, the Company's Real Estate division has adopted a dedicated Anti-Money Laundering & Anti-Bribery and Corruption Policy (AML & ABAC Policy), effective July 2025, which sets out essential steps employees must take to prevent involvement in any activity relating to bribery, facilitation payments, corruption, or money laundering. The Policy applies to all employees at all levels, consultants, contractors, agents, and any person acting on behalf of the Company, and prohibits the offer, promise, or acceptance of any bribe, kickback, or illegal payment directly or indirectly. Furthermore, ABREL enforces a strict Related Party Transactions Policy, ensuring transparency and fairness in all dealings with related parties, further reinforcing its dedication to ethical governance.

The Code of Conduct for the Board and senior management is available under the 'Policies, Codes and Others' section on the Company's website: <https://www.adityabirlarealestate.com/corporate-governance#Policies-Codes-tab> or directly via this link: [https://www.adityabirlarealestate.com/abrelcms/uploads/policiescodesothers/policiescodesothers\\_1728477737.pdf](https://www.adityabirlarealestate.com/abrelcms/uploads/policiescodesothers/policiescodesothers_1728477737.pdf).

Additionally, the Code of Conduct for employees and the AML & ABAC Policy are accessible to all employees.

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

	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Directors		
KMPs		
Employees	Nil	Nil
Workers		

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

	FY 2025–26 (Current financial year)		FY 2024–25 (Previous financial year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	-	Nil	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	-	Nil	-

**7. Provide details of any corrective action taken or underway on issues related to fines/penalties/action taken by regulators/law enforcement agencies/judicial institutions, on cases of corruption and conflicts of interest.**

ABREL has not been subjected to any fines, penalties, or regulatory actions related to cases of corruption or conflict of interest during FY 2025–26.

**8. Number of days of accounts payables ((Accounts payable\*365)/Cost of goods or services procured) in the following format:****9. Openness 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	FY 2025–26 (Current financial year)	FY 2024–25 (Previous financial year)
Concentration of purchases	a. Purchases from trading houses as % of total purchases	70%	73%
	b. Number of trading houses where purchases are made from	100	88
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	40%	62%
Concentration of sales	a. Sales to dealers/distributors as % of total sales	84%	85%
	b. Number of dealers/distributors to whom sales are made	85	89
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	51%	47%
Share of RPTs in	a. Purchases (Purchases with related parties/total purchases)	0	0
	b. Sales (Sales to related parties/total sales)	0	12.53%
	c. Loans & advances (Loans & advances given to related parties/total loans & advances)	0	0
	d. Investments (Investments in related parties/total investments made)	30.20%	23.08%

**Leadership Indicators****1. Awareness programmes conducted for value chain partners on any of the principles during the financial year:**

Business segment	Total number of awareness programmes held	Topics/principles covered under the training	% of value chain partners covered (by value of business done with such partners) under the awareness programmes
Real Estate	2,794	Safety-related trainings and internal trainings including prevention of child labour, and good governance practices	1.17
Pulp and Paper	0	-	0

**2. Does the entity have processes in place to avoid/manage conflict of interests involving members of the Board? (Yes/No) If yes, provide details of the same.**

Yes. ABREL has instituted extensive measures to prevent and manage conflict of interests among its board members and senior management, as detailed in the Company's Code of Conduct. This code prioritises ethics, integrity, and honesty, offering clear guidelines for addressing ethical challenges, reporting unethical behaviour, and fostering a culture of accountability. These initiatives ensure that all decisions and actions reflect the highest ethical standards, strengthening the organisation's commitment to exemplary governance.

ABREL's code of conduct for board and senior management can be accessed through the 'Policies, Codes and Others' section on its website: <https://www.adityabirlarealestate.com/corporate-governance#Policies-Codes-tab> or directly through this link: [https://www.adityabirlarealestate.com/abrelcms/uploads/policiescodesothers/policiescodesothers\\_1728477737.pdf](https://www.adityabirlarealestate.com/abrelcms/uploads/policiescodesothers/policiescodesothers_1728477737.pdf). Furthermore, the Code of Conduct for employees is accessible to all employees through the Company's intranet.

## PRINCIPLE 2

Businesses should provide goods and services in a manner that is sustainable and safe

This principle emphasises safety and resource efficiency in product design and manufacturing. For a business to create value, it must minimise and mitigate its negative effects on the environment and society at every stage of the product's life cycle, from design to final disposal.

At ABREL, integrating sustainability into operations remains a core priority, guaranteeing that its products and services are environmentally and socially responsible. This approach extends across

the supply chain, where the Company prioritises sustainable raw materials and collaborates with partners aiming for net-zero emissions. In the coming fiscal year, ABREL plans to implement sustainable supply chain assessments to better monitor its progress. Moreover, aligning with NGRBC's Principle 2, the Company is dedicated to advancing several UN SDGs, including sustainable cities, responsible consumption, climate action, and clean water and sanitation.

### SDG Linkages



### 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.

	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)	Details of improvements in environmental and social impacts
R&D	0	0	-
Capex	0	0	-

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

Yes. ABREL has implemented procedures for sustainable sourcing across its business segments.

In the Real Estate segment, the Company promotes sustainability by working with ISO-certified suppliers who have established environmental targets. A significant initiative in this area is the innovative use of Ground Granulated Blast Furnace Slag (GGBS) in concrete, which helps lower carbon emissions and manage waste efficiently.

At the same time, within the Pulp and Paper segment, ABREL supports sustainability by utilising FSC-certified raw materials where required and through promoting social forestry initiatives. In addition, the Company consistently evaluates and adjusts its sourcing policies to maintain its commitment to environmental objectives and ethical business practices.

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

3.65%

3. Describe the processes in place to safely reclaim your products for reusing, recycling, and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

Under its Extended Producer Responsibility (EPR) initiative, ABREL has established procedures for reclaiming its plastic packaging materials at the end

of their lifecycle. To accomplish this, it collaborates with a third-party agency to reclaim and recycle these materials. Other types of waste, including e-waste, hazardous waste, and general waste, are disposed of in full compliance with relevant regulations and guidelines.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes/No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Yes. ABREL is registered with the Central Pollution Control Board (CPCB) as an entity subject to EPR regulations for plastic waste. The Company falls under Plastic EPR Categories 1 and 2, classified among Producers, Importers, and Brand Owners (PIBO) and accordingly acknowledges its duty to manage the environmental impact of its packaging.

In line with these commitments, ABREL has established a waste collection plan in accordance with the EPR requirements set by the CPCB. This plan ensures the appropriate collection, recycling, and disposal of packaging waste linked to the PIBO classification. The Company also reinforces its environmental responsibility by adhering to the Plastic Waste Management (PWM) Rules of 2016.



## Leadership Indicators ▶

**1. Has the entity conducted Life Cycle Perspective/Assessments (LCA) for any of its products (for the manufacturing industry) or for its services (for the service industry)? If 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	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the weblink.
----------	-------------------------	---------------------------------	--	---	---

While ABREL has not yet conducted formal Life Cycle Assessments (LCA), the Company has initiated LCA-aligned practices such as embodied carbon assessment for seven projects in the real estate division. These efforts support low-carbon material selection and serve as a foundation for undertaking comprehensive LCAs in the future for all LEED certified projects.

**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
-------------------------	---------------------------------	--------------

Embodied carbon assessment was conducted for 7 projects and no significant concerns and/or risks arising from our operations were identified during the process.

**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).**

Business segment	Indicate input material	Recycled or reused input material to total material*	
		FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Real Estate	Granulated Blast Furnace Slag (GGBS) in concrete (in Metric Tonnes) MT	1.53	1.02
	Secondary steel in MT	1.25	0.30
	Fly ash in MT	3.54	1.98
	Fly ash Bricks in MT	0.32	0.56
Pulp and Paper	Veneer chips in MT	2.27	4.97
	Bagasse (residual of sugarcane) in MT	8.30	7.36
	Wastepaper (domestic and imported) in MT	1.29	1.77

\*The percentage calculation of recycled or input material used in production is based on the mass of the material.

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

	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	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

**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
Plastic waste as part of EPR	NA



**PRINCIPLE 3**

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

This principle mandates businesses to implement policies and procedures that ensure fairness, respect, and welfare of all workers involved in a company or its supply chain. The policies and procedures are required to be implemented without bias and in a manner that fosters diversity. Moreover, the principle acknowledges that the welfare of employees and their families is also a part of a company's overall welfare.

ABREL recognises the crucial role its employees play in business operations and prioritises their well-being. As part of the ABG, the Company emphasises diversity and offers equal opportunities and inclusivity for all, including minority groups, in

every aspect of its operations. Its comprehensive Human Rights Policy adheres to international standards like the International Labour Organisation (ILO) and the United Nations Global Compact (UNGC), aims to ensure that no employee experiences physical or mental harassment.

In addition, ABREL's dedication to Principle 3 is closely linked with SDGs such as promoting good health and well-being, decent work, reducing inequalities, and achieving gender equality. With this focus, the Company aims to uphold a supportive work environment that meets all necessary requirements and contributes to the overall welfare of its employees.

**SDG Linkages****Essential Indicators****1. a. Details of measures for the well-being of employees:**

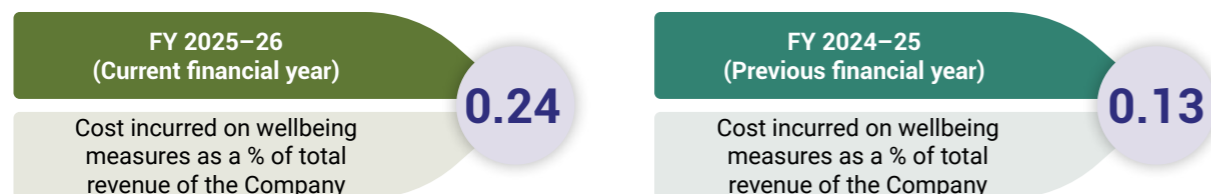
Category	Total (A)	% of employees covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent employees</b>											
Male	1,210	1,210	100	1,210	100	-	-	1,210	100	348	29.15
Female	181	181	100	181	100	181	100	-	-	114	63.33
<b>Total</b>	<b>1,391</b>	<b>1,391</b>	<b>100</b>	<b>1,391</b>	<b>100</b>	<b>181</b>	<b>100</b>	<b>1,210</b>	<b>100</b>	<b>462</b>	<b>33.62</b>
<b>Other than permanent employees</b>											
Male	132	83	62.88	110	83.33	-	-	83	62.88	0	0
Female	18	16	88.89	17	94.44	16	88.89	-	-	0	0
<b>Total</b>	<b>150</b>	<b>99</b>	<b>66.00</b>	<b>127</b>	<b>84.67</b>	<b>16</b>	<b>88.89</b>	<b>83</b>	<b>62.88</b>	<b>0</b>	<b>0</b>

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

Category	Total (A)	% of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent workers</b>											
Male	1,370	1,370	100	1,370	100	-	-	1,370	100	0	0
Female	0	0	NA	0	NA	0	NA	-	-	0	0
<b>Total</b>	<b>1,370</b>	<b>1,370</b>	<b>100</b>	<b>1,370</b>	<b>100</b>	<b>0</b>	<b>NA</b>	<b>1,370</b>	<b>100</b>	<b>0</b>	<b>0</b>
<b>Other than permanent workers</b>											
Male	3,925	3,925	100	3,925	100	-	-	0	NA	0	0
Female	3	3	100	3	100	0	NA	-	-	3	100
<b>Total</b>	<b>3,928</b>	<b>3,928</b>	<b>100</b>	<b>3,928</b>	<b>100</b>	<b>0</b>	<b>NA</b>	<b>0</b>	<b>NA</b>	<b>3</b>	<b>0.07</b>



c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:



2. Details of retirement benefits, for current financial year and previous financial year.

Benefits	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	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/NA)	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/NA)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	0.29%	3.94%	Y	0.09%	0.72%	Y
Others – National Pension Scheme (NPS)	9.56%	0%	Y	8.81%	0.00%	Y

3. Accessibility of workplaces

Are the premises/offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

Yes. In compliance with the Rights of Persons with Disabilities Act, 2016, the Company ensures that all premises, including project sites and offices across its diverse business divisions, are accessible to employees and workers with disabilities. This dedication is reflected in the provision of wheelchair-accessible restrooms on ground floors, the installation of ramps for wheelchair users, and other viable accessibility enhancements across all business locations. Through these measures, the Company fosters a welcoming and inclusive environment for everyone.



4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a weblink to the policy.

Yes. ABREL is committed to maintaining a non-discriminatory environment and upholding its status as an equal opportunity employer as outlined in its Human Rights Policy. This policy, aligned with the Rights of Persons with Disabilities Act, 2016, is readily accessible to all employees through the Company's intranet system.

The Company ensures that all employees and prospective candidates are accorded equal opportunities, regardless of race, colour, gender, sexual orientation, gender identity or expression religion, national origin, age, disability, or any other protected characteristic. The hiring, promotion, and compensation practices are rooted in merit, qualifications, and abilities. This approach reinforces ABREL's dedication to nurturing a diverse and inclusive workforce where every individual is valued for their unique contributions.

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	100%	#	#
Female	67%	100%	#	#
<b>Total</b>	<b>98%</b>	<b>100%</b>	<b>#</b>	<b>#</b>

#No permanent workers availed parental leave during the financial year.

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

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent workers	ABREL remains committed to maintaining open and effective communication channels to swiftly resolve any issues faced by its employees and workers. Through its open-door policy, the Company encourages direct interaction with Senior Management, ensuring concerns are promptly addressed.
Other than permanent workers	In addition, the Grievance Drop Box, placed within Company premises, offers team members a confidential and anonymous means to report issues. To further complement this, the Company has established a strong Whistle Blower Policy, alongside a well-structured Prevention of Sexual Harassment (POSH) framework. These frameworks collectively promote a transparent and respectful workplace. To further strengthen these measures, the Company has appointed a dedicated Ethics and Vigilance Officer, who manages all complaints with sensitivity and confidentiality.
Permanent employees	Simultaneously, ABREL maintains a meticulous focus on safety across all its segments. In the Pulp and Paper division, employees are equipped with emergency contact cards, and safety regulations are rigorously enforced. Similarly, in the Real Estate segment, the Company enforces stringent safety standards, where non-compliance may lead to penalties or termination, underscoring the Company's focus on a safe and secure working environment.
Other than permanent employees	Together, these comprehensive systems ensure that all employees and workers have access to a solid grievance redressal framework, fostering a supportive and secure workplace.

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

Category	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	Total employees/ workers in respective category (A)	No. of employee/ 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)
<b>Total permanent employees</b>	1,391	0	0	1,169	0	0
Male	1,210	0	0	1,027	0	0
Female	181	0	0	142	0	0
<b>Total permanent workers</b>	1,370	0	0	1,385	0	0
Male	1,370	0	0	1,385	0	0
Female	0	-	-	0	-	-

**8. Details of training given to employees and workers:**

Category	FY 2025-26 (Current financial year)					FY 2024-25 (Previous financial year)				
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Male	1,210	1,133	93.64	1,125	92.98	1,027	689	67	983	96
Female	181	170	93.92	171	94.48	142	21	15	129	91
<b>Total</b>	<b>1,391</b>	<b>1,303</b>	<b>93.67</b>	<b>1,296</b>	<b>93.17</b>	<b>1,169</b>	<b>710</b>	<b>61</b>	<b>1,112</b>	<b>95</b>
<b>Workers</b>										
Male	1,370	911	66.50	1,001	73.07	1,385	0	0	1,037	75
Female	0	-	-	-	-	0	-	-	-	-
<b>Total</b>	<b>1,370</b>	<b>911</b>	<b>66.50</b>	<b>1,001</b>	<b>73.07</b>	<b>1,385</b>	<b>0</b>	<b>0</b>	<b>1,037</b>	<b>75</b>

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

Category	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	1,210	981	81.07	1,027	1,023	99.61
Female	181	174	96.13	142	142	100
<b>Total</b>	<b>1,391</b>	<b>1,155</b>	<b>83.03</b>	<b>1,169</b>	<b>1,165</b>	<b>99.66</b>
<b>Workers</b>						
Male	1,370	266	19.42	1,385	0	0
Female	0	-	NA	0	0	NA
<b>Total</b>	<b>1,370</b>	<b>266</b>	<b>19.42</b>	<b>1,385</b>	<b>0</b>	<b>0</b>

Note: As per ABREL's policy, all employees and workers are entitled to an annual performance and career development review. These reviews follow the financial year cycle, from April to March. The percentage of employees or workers not covered in the current review largely comprises those who joined the organisation between January 2025 and March 2025. These individuals will be included in next year's performance review cycle, ensuring that all employees and workers can participate in the evaluation process within the stipulated timeframe.

**10. Health and safety management system:****a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/No). If yes, what is the coverage of such a system?**

Yes. ABREL has established strong Occupational Health and Safety Management Systems (OHSMS) that are certified under ISO 45001:2018. This certification underscores the Company's commitment to employee protection for both direct employees and contract workers.

The system ensures that occupational health and safety protocols are thoroughly implemented and continuously monitored throughout the organisation, creating a secure and conducive working environment. With a focus on preventive measures and ongoing safety audits, ABREL prioritises the wellbeing of its workforce. This further affirms its dedication to maintaining high standards of safety and health across all operational levels.

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

The Company consistently implements its comprehensive Standard Operating Procedures (SOPs) across all business segments, systematically identifying workplace hazards and evaluating risks.

Integral to its ISO 45001:2018 certification for OHSMS, ABREL has meticulously documented procedures aimed at thoroughly evaluating work-related hazards and risks. These measures ensure a proactive approach to safety and highlight the Company's focus on maintaining a secure and healthy working environment for employees. Key initiatives include:

**Hazard Identification and Risk Assessment (HIRA):**

ABREL actively engages with the working personnel to identify risks and analyse potential dangers, applying suitable controls to mitigate them. Additionally, the inclusion of air quality monitoring devices support the Company's approach to mitigating environmental hazards associated with air pollution.

**Job Safety Analysis (JSA):**

Each job task is analysed at an activity level to assess risks and implement mitigation strategies before critical operations commence. Proactive measures such as real-time monitoring of air pollution control systems via CCTV, exemplify the level of detail involved in JSA.

**Behaviour-Based Safety Operations (BBSO):**

The BBSO system identifies risks associated with unsafe behaviours. The Company extends this proactive safety culture with training programmes, such as BBS training, encouraging employees to voluntarily adhere to safety practices and report unsafe conditions.



**Incident Investigation:** ABREL's solid mechanism for investigating incidents helps in identifying risks and hazards. The deployment of anti-smog guns and regular ambient air monitoring, further enhances the Company's capability to control air quality-related incidents.

**Safety Audits:** Regular audits, both internal and external, ensure compliance with safety standards. This is supported by extensive training programmes, including IMS and CIDC trainings, which prepare employees to uphold these safety norms.

Together, these measures highlight ABREL's commitment to maintaining a safe and healthy work environment for all employees and workers.

**c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)**

ABREL ensures that all workers and employees receive thorough training in hazard identification and are well-versed in risk reporting protocols. To facilitate this, the Company has established multiple channels for reporting potential job-related dangers. These include specialised written forms, direct communication with managers, and interactions with the Company's health and safety department. Furthermore, the Whistle Blower Policy allows for the anonymous reporting of potential or actual risks.

Upon identifying a hazard, employees are empowered to promptly vacate the danger zone, notify their managers, and follow established evacuation protocols. These measures ensure timely reporting and proactive involvement in maintaining a safe workplace.

**d. Do the employees/workers of the entity have access to non-occupational medical and healthcare services? (Yes/No)**

Yes. ABREL is committed to fostering the overall wellbeing of its employees and their families through a holistic healthcare framework. The Company's initiatives extend beyond occupational health, with a focus on preventative care, mental wellness, and access to quality healthcare. Key initiatives include:

- Comprehensive health insurance coverage for employees and their immediate family members, including OPD consultations and hospitalisation expenses
- Access to emergency treatment and financial support for non-work-related medical conditions
- Routine health check-ups and wellness programmes aimed at promoting preventative care and physical well-being
- Partnership with Mpower in the Real Estate segment to strengthen mental health awareness and support
- Certification of 25 employees as wellness ambassadors to encourage a more supportive and mentally aware workplace culture
- Structured mental health sessions and access to a dedicated group of counsellors for employees and their family members whenever needed

Through these initiatives, ABREL underpins its dedication to creating a healthy, supportive, and nurturing environment for its workforce.

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

Safety incident/number	Category	FY 2025-26 (Current financial year)	
		FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Lost Time Injury Frequency Rate (LTIFR) (per one million person-hours worked)	Employees	0.96	8.15
	Workers	0.07	0.00
Total recordable work-related injuries	Employees	2	17
	Workers	2	0
No. of fatalities	Employees	0	1
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

ABREL continues to strengthen its safety culture through structured training programmes, preventive environmental measures, and organisation-wide awareness initiatives. Key initiatives undertaken by the Company include:

- Conducted comprehensive training programmes covering IMS training, BBS training, and emergency response team preparation, with the participation of 3,963 employees
- Implemented air pollution control measures, including the installation of air quality monitoring devices and anti-smog guns

- Conducted air quality monitoring every six months in line with the Company's sustainability goals
- Organised awareness campaigns and engagement initiatives during occasions such as World Environment Day, Anti-Tobacco Day, Road Safety Week, and National Safety Week
- Achieved 100% participation across projects in India, supported by initiatives such as medical camps and safety quizzes, reflecting a deeply ingrained safety-first approach

Through these continued efforts, the Company demonstrates its dedication to workplace safety.

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

	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Working conditions	0	0	NA	0	0	NA
Health and safety	0	0	NA	0	0	NA

**14. Assessments for the year:**





**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.**

ABREL's meticulous assessment of health and safety practices, alongside working conditions, has identified key risk areas across its various business segments. To enhance this process, the Company has deployed a high-risk team dedicated to identifying major risk factors in each segment and implementing targeted mitigation strategies. As part of this process, the team conducts regular safety patrols, audits project sites, and compiles detailed reports to maintain comprehensive oversight. At the same time, a Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis provides further support to this framework.

The high-risk focus team has identified electrical hazards and working at heights as critical health and safety risks. To mitigate electrical risks effectively, the segment electrical head conducts frequent audits, while Electrical Lockout Tagout (LOTO) procedures are strictly enforced. The adoption of IP65-rated equipment further strengthens adherence to high safety standards.

Furthermore, in the Real Estate sector, where high-rise developments are prevalent, the risk associated with working at elevated heights is addressed through the deployment of fall-resistant equipment, ensuring the utmost safety for workers. This proactive approach reflects the Company's commitment to creating a safe and secure work environment across all its operations.

### Leadership Indicators

**1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).**

Yes. ABREL ensures comprehensive benefits for both workers and employees, including life insurance and compensation packages in the unfortunate event of death.

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

ABREL ensures stringent compliance with statutory dues among its value chain partners by implementing a series of measures designed to uphold transparency and regulatory adherence:

**Vendor Engagement:** ABREL collaborates with vendors who have a proven track record of regulatory compliance. This selection criterion is essential to maintaining adherence across all business segments.

**Internal Control Systems:** The Company has established internal mechanisms to guarantee both timely and complete payment of statutory dues. These systems actively monitor and verify that all obligations are fulfilled accurately and on schedule.

**Mandatory Documentation:** Contractors and third parties are required to submit copies of challans for Provident Fund (PF) and Employees State Insurance (ESI) contributions made on behalf of their employees. This helps ensure that all statutory payments are made correctly.

**Digital Compliance Verification:** The Company conducts online checks to verify the PF, ESI, and GST returns filed by contractors and third parties. These digital checks enable effective oversight and reinforce compliance across the supply chain.

Through these diligent practices, the Company exemplifies its focus on maintaining operational integrity and ensuring all partners adhere to the highest standards of compliance and governance.

**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 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	
	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Employees	0	0	0	0
Workers	0	0	0	0

**4. Does the entity provide transition assistance programmes to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/No)**

Yes. ABREL supports transition assistance programmes designed to enhance employability and manage career changes due to retirement or termination. While a formal programme is not established, the Company extends support to mid to senior-level employees and executives after retirement.

Aligned with ABG's policies, the Company offers a comprehensive weeklong training programme covering areas like savings, spirituality, socialisation, health, and exercise for retired professionals and their spouses. The human resources team plays a pivotal role in this process, assessing individual needs, providing tailored guidance, and offering robust support throughout the transition. This initiative underscores ABREL's commitment to the long-term prosperity and employability of its workforce, reflecting a deep dedication to employee wellbeing.

**5. Details on assessment of value chain partners:**

	% of value chain partners (by value of business done with such partners) that were assessed	
	Real Estate	Pulp and Paper
Health and safety conditions	1.17%	0%
Working conditions	1.17%	0%

**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.**

During this financial year, ABREL has not identified any significant risks that require immediate action through its rigorous assessment process.

As part of the assessment process, the Company has implemented a detailed checklist to evaluate its value chain partners, with criteria centred on creditworthiness, market presence, and peer feedback. The assessment also considers financial capacity, client preferences, net worth, and experience.

For vendors deemed material to the Company, the Pulp and Paper division conducts half-yearly assessments on quality, supply quantity, and service. Consequently, each vendor receives a rating on a scale of 1 to 5. Based on these scores, vendors may be removed, warned, educated on areas of development, informed, or retained, ensuring accountability and continuous improvement of partnerships.

In the Real Estate division, the process of identifying key suppliers for ESG Due Diligence has been initiated in FY 2025-26. The formal assessment of these suppliers on environmental and social parameters is planned for the coming year.

**PRINCIPLE 4**

Businesses should respect the interests of and be responsive to all its stakeholders

The Company operates within a broader ecosystem where multiple stakeholders, including investors, customers, employees, suppliers, communities, regulators, and the environment in which it operates, have a legitimate interest in how the business is conducted. Principle 4 of the National Guidelines on Responsible Business Conduct (NGRBC) calls upon companies to acknowledge this interdependence and to be accountable for both maximising the value created for stakeholders and minimising any adverse impact arising from operations.

At ABREL, this principle is reflected in how we engage rather than how we report. We view stakeholder responsiveness as an ongoing dialogue, not a periodic exercise. Beyond the formal stakeholder identification and materiality processes that inform strategy, the Company maintains continuous channels of communication across functions to surface concerns early, respond to them in a timely

manner, and build the trust on which long-term relationships depend.

The Company's approach under this principle is anchored in UN SDGs, relevant to its role as a real estate developer and corporate citizen. This includes the development of sustainable cities and communities, the advancement of peace, justice, and strong institutions, and the broader effort to promote gender equality and alleviate poverty. These priorities translate into concrete initiatives across the project sites, workforce, and the communities adjacent to its developments.

Together, these commitments reinforce ABREL's position as an industry participant that views responsible and sustainable business conduct not as an external obligation but as an integral part of its value creation approach. Through this, the Company seeks to create long-term value for shareholders, stakeholders, and the ecosystems within which it operates.

**SDG Linkages**



**Essential Indicators**

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

ABREL defines stakeholders as individuals, groups, or entities either impacted by its activities, products, or services, or capable of influencing or holding a vested interest in its operations. Accordingly, the process of stakeholder identification and prioritisation involves mapping and assessing each stakeholder's relevance based on their impact, influence, and importance to the Company. To ensure thorough stakeholder engagement, ABREL employs surveys and feedback mechanisms to gather essential information.

The list of key stakeholders is finalised through collaborative discussions among board members,

managers, and pertinent staff. In terms of classification, stakeholders are divided into internal and external categories, depending on their reciprocal impact on the Company. External stakeholders include investors, lenders, customers, regulatory bodies, suppliers, other supply chain partners, local communities, non-governmental organisations, joint venture partners, and the media. Meanwhile, internal stakeholders comprise employees, permanent workers, and contractual support staff.

This structured approach reflects the Company's commitment to maintaining strong relationships and fostering an inclusive dialogue with all parties involved.

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

Stakeholder group	Whether identified as vulnerable and marginalised group (Yes/No)	Channels of communication (Email, SMS, newspaper, pamphlets, advertisement, community meetings, notice board, website, other)	Frequency of engagement (Annually/half-yearly/quarterly/others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
<b>Investors and shareholders</b>	No	<ul style="list-style-type: none"> <li>Quarterly investor conferences</li> <li>One-on-one engagements</li> <li>Annual General Meeting (AGMs)</li> <li>Annual/Integrated Reports</li> </ul>	Quarterly	<ul style="list-style-type: none"> <li>Consistent operational performance</li> <li>Timely disclosures and compliance</li> <li>Updated corporate governance framework</li> <li>Consistent return on investments and profitable growth</li> </ul>
<b>Regulatory bodies</b>	No	<ul style="list-style-type: none"> <li>Annual/Integrated Reports</li> <li>Regular meetings</li> <li>Industry forums</li> <li>Emails and letters</li> <li>Policy updates and ministry directives</li> <li>Conferences</li> <li>Regulatory filings</li> </ul>	Periodic/Annual	<ul style="list-style-type: none"> <li>Compliance to regulations</li> <li>Pollution prevention</li> <li>Tax and royalties</li> </ul>



Stakeholder group	Whether identified as vulnerable and marginalised group (Yes/No)	Channels of communication (Email, SMS, newspaper, pamphlets, advertisement, community meetings, notice board, website, other)	Frequency of engagement (Annually/half-yearly/quarterly/others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
<b>Customers/ consumers</b>	No	<ul style="list-style-type: none"> <li>Virtual sessions</li> <li>Grievance redressal mechanism</li> <li>Exhibitions and trade fairs</li> <li>Advertising campaigns</li> <li>Regular business interactions</li> <li>Customer satisfaction surveys</li> </ul>	Quarterly	<ul style="list-style-type: none"> <li>Product quality and fair pricing</li> <li>Post-sales support</li> <li>Product safety</li> <li>Sustainable product offerings and solutions</li> </ul>
<b>Supply chain partners</b>	Yes (small and local suppliers)	<ul style="list-style-type: none"> <li>Supplier grievance mechanism</li> <li>Emails and meetings</li> <li>Supplier assessments and reviews</li> <li>Training workshops and seminars</li> </ul>	Continuous	<ul style="list-style-type: none"> <li>Good pricing</li> <li>Value creation</li> <li>Continuity of orders</li> <li>Timely payment</li> <li>Long-term commitments with business partners</li> </ul>
<b>Community/ local community</b>	No	<ul style="list-style-type: none"> <li>Training and workshops</li> <li>Engagement and assessment surveys</li> <li>CSR reports</li> <li>Emails and telephonic conversations</li> </ul>	Continuous	<ul style="list-style-type: none"> <li>Water and sanitation facilities</li> <li>Infrastructure development</li> <li>Training and inclusive growth</li> <li>Environmentally friendly operations</li> <li>Improvement in overall living standards</li> <li>Livelihood creation and adequate opportunities</li> </ul>

Stakeholder group	Whether identified as vulnerable and marginalised group (Yes/No)	Channels of communication (Email, SMS, newspaper, pamphlets, advertisement, community meetings, notice board, website, other)	Frequency of engagement (Annually/half-yearly/quarterly/others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
<b>Employees</b>	No	<ul style="list-style-type: none"> <li>Grievance redressal mechanism</li> <li>Employee engagement programmes</li> <li>Emails and meetings</li> <li>Performance reviews</li> </ul>	Continuous	<ul style="list-style-type: none"> <li>Physical and mental wellbeing</li> <li>Occupational health and safety</li> <li>Rewards and recognition</li> <li>Work-life balance</li> <li>Fair wages and equal opportunities</li> <li>Training and upskilling</li> <li>Career growth</li> </ul>
<b>Media</b>	No	<ul style="list-style-type: none"> <li>Press conferences</li> <li>Press releases</li> <li>Discussions and interviews with leadership</li> <li>Industry events</li> </ul>	Need-based	<ul style="list-style-type: none"> <li>Transparent communication</li> </ul>
<b>Non-governmental organisation</b>	No	<ul style="list-style-type: none"> <li>Social surveys</li> <li>One-on-one interaction</li> <li>Participation in events</li> </ul>	Periodic	<ul style="list-style-type: none"> <li>Strong community engagement</li> <li>Transparent and accountable resource utilisation</li> <li>Expertise in social and environmental issues</li> </ul>
<b>Joint-venture partners</b>	No	<ul style="list-style-type: none"> <li>Emails and meetings</li> <li>Personal interactions</li> <li>Workshops and seminars</li> </ul>	Continuous	<ul style="list-style-type: none"> <li>Value creation</li> <li>Long-term commitments</li> <li>Timely disclosures and compliance</li> </ul>



Leadership Indicators

**1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.**

Through a well-rounded stakeholder engagement process, ABREL gathers diverse perspectives and insights on critical economic, environmental, and social issues impacting its business operations. During the Board review process, any identified gaps or valuable insights are communicated to Senior Management to enable timely corrective action.

Furthermore, the Company diligently keeps the board informed on the progress of the solutions implemented to address these gaps and observations. This systematic approach underscores ABREL's commitment to sustained improvement, transparency, and responsive corporate governance.

**2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes/No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.**

Yes. ABREL considers stakeholder consultations as a crucial element in identifying and addressing environmental and social issues. On this front, the Company actively seeks feedback from relevant stakeholders and integrates their insights into its operational practices and strategic procedures. By doing so, it ensures a sharp focus on substantive topics identified during these engagements.

By aligning its initiatives with stakeholder expectations, ABREL enhances operational sustainability and advances its strategic objectives. This ongoing dialogue reflects the Company's dedication to encouraging collaboration and delivering sustainable value across all its operations.

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

ABREL actively addresses the needs of vulnerable and marginalised stakeholder groups across its business

segments. These initiatives are designed to empower the communities by providing access to opportunities and essential services. A key aspect of its efforts involves collaboration with local stakeholders and authorities to prevent environmental hazards and promote sustainability. For instance, the Pulp and Paper segment partners with the Forest Department of Nainital to collect and utilise dried leaves from forests, mitigating the risk of forest fires during the summer. Besides protecting the environment, this initiative reduces reliance on non-renewable energy sources.

At the same time, ABREL's CSR initiatives are strategically designed to meet the distinct needs of marginalised communities. Through various healthcare initiatives, including medical camps, the Company enhances access to medical services and upgrades local hospital infrastructure, directly benefiting hundreds. Furthermore, ABREL emphasises sanitation and hygiene through regular cleaning and garbage removal, mosquito fumigation, and awareness programmes, which collectively enhance public health and prevent disease outbreaks.

Infrastructure development remains a pivotal aspect of the Company's community support, with significant efforts like the construction of toilets in areas like Bindukhatta and Shantipuri. These initiatives enhance living standards and contribute to overall dignity. To assist vulnerable families during colder months, the Company distributes blankets as part of its support initiatives. Importantly, women's empowerment remains a core priority, with skill development centres in the mentioned regions providing vocational training that enables women and girls to build sustainable livelihoods.

Additionally, promoting educational opportunities for disadvantaged groups is crucial to ABREL's strategy. To enhance this commitment, the Company constructs classrooms and supports skill-building programmes that uplift communities and support long-term economic development. The Company also integrates environmental activities into its CSR initiatives to maintain a suitable environment around its operations.

**PRINCIPLE 5**

**Businesses should respect and promote human rights**

This principle states that businesses have an obligation to respect human rights by ensuring that they do not inadvertently cause or contribute to human rights violations. It also requires companies to address such impacts when they occur.

ABREL views its employees and workers as critical pillars, upholding strong human rights practices that extend throughout its value chain. These policies align with the guidelines set forth by the ILO and the UNGP. Consistent with this approach, the Company respects the human rights of its workforce, communities, and all individuals

impacted by its operations, including contractors and suppliers.

The Company actively addresses identified issues and implements risk mitigation strategies to prevent any potential adverse impacts. Adhering to Principle 5 of its human rights policy, ABREL contributes to various SDGs, including promoting gender equality, decent work, and economic growth. This approach reduces inequalities, supports quality education, and contributes to poverty alleviation. This dedication reflects the Company's proactive approach to fostering a just and equitable environment across its operations.

**SDG Linkages**





## Essential Indicators ▶

## 1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

Category	FY 2025–26 (Current financial year)			FY 2024–25 (Previous financial year)		
	Total (A)	No. of employees/workers covered (B)	% (B/A)	Total (C)	No. of employees/workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	1,391	880	63	1,169	753	64
Other than permanent	150	74	49	153	52	34
<b>Total employees</b>	<b>1,541</b>	<b>954</b>	<b>62</b>	<b>1,322</b>	<b>805</b>	<b>61</b>
<b>Workers</b>						
Permanent	1,370	14	1	1,385	0	0
Other than permanent	3,928	120	3	3,890	182	5
<b>Total workers</b>	<b>5,298</b>	<b>134</b>	<b>3</b>	<b>5,275</b>	<b>182</b>	<b>3</b>

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

Category	FY 2025–26 (Current financial year)				FY 2024–25 (Previous financial year)					
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
<b>Permanent</b>										
Male	1,210	0	0	1,210	100	1,027	0	0	1,027	100
Female	181	0	0	181	100	142	0	0	142	100
<b>Other than permanent</b>										
Male	132	0	0	132	100	130	0	0	130	100
Female	18	0	0	18	100	23	0	0	23	100
<b>Workers</b>										
<b>Permanent</b>										
Male	1,370	0	0	1,370	100	1,385	0	0	1,385	100
Female	0	0	NA	0	NA	0	0	0	0	NA
<b>Other than permanent</b>										
Male	3,925	0	0	3,925	100	3,888	0	0	3,888	100
Female	3	-	0	3	100	2	0	0	2	100

## 3. Details of remuneration/salary/wages, in the following format:

## a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/salary/wages of respective category	Number	Median remuneration/salary/wages of respective category
Board of Directors (BoD)	5	22,04,167	3	21,81,666
Key Managerial Personnel	3	2,25,87,017	0	NA
Employees other than BoD and KMP	1,210	13,73,040	181	15,87,209
Workers	1,370	6,05,484	0	NA

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

	FY 2025–26 (Current financial year)	FY 2024–25 (Previous financial year)
Gross wages paid to females as % of total wages	8.01%	7.03%

## 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/No)

Yes. ABREL has an Ethics and Vigilance Officer tasked with safeguarding workers' rights and promoting wellbeing in the workplace. The Company also enforces strong human rights policies applicable to its employees, suppliers, and service providers, ensuring adherence to applicable laws and upholding the essence of human rights.

Additionally, in accordance with the POSH Act, 2013, the Company has established Internal Complaints Committees at every office and unit. These committees receive and address complaints of sexual

harassment, fostering a supportive and respectful working environment for women.

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

Employees are encouraged to report any human rights concerns to the Company's Ethics and Vigilance Officer, with confidentiality assured throughout the process. Upon receiving a complaint, a preliminary inquiry is promptly conducted to assess the nature and severity of the issue. The findings are then reviewed by the Audit Committee, which plays a pivotal role in examining and resolving human rights matters. Based on the committee's recommendations, appropriate steps are taken to address the grievance effectively.

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

	FY 2025–26 (Current financial year)			FY 2024–25 (Previous financial year)		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual harassment	2	1	POSH complaints include 1 case at each real estate and pulp and paper division respectively. Internal inquiry was initiated and appropriate actions have been taken on the same for the Real Estate division case while Pulp and Paper division's case inquiry is still ongoing.	1	0	-
Discrimination at workplace	0	0	-	0	0	-



	FY 2025–26 (Current financial year)			FY 2024–25 (Previous financial year)		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Child labour	0	0	-	0	0	-
Forced labour/involuntary labour	0	0	-	0	0	-
Wages	0	0	-	0	0	-
Other human rights related issues	0	0	-	0	0	-

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

	FY 2025–26 (Current financial year)	FY 2024–25 (Previous financial year)
Total complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	2	1
Complaints on POSH as a % of female employees/workers	0.99%	0.59%
Complaints on POSH upheld	1	1

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

ABREL has implemented rigorous procedures to protect individuals who report discrimination or harassment. The Company has put in place a comprehensive grievance redressal mechanism to effectively address violations of the Code of Conduct, as well as complaints related to discrimination, harassment, and the Prevention of Sexual Harassment (POSH) Act. Designated committee members, appointed and trained in line with Company policies and the grievance redressal framework, handle all cases with strict confidentiality. To enhance the effectiveness of this process, the Company consistently promotes awareness, education, and sensitisation initiatives

regarding its policies and procedures, ensuring that all stakeholders are informed and engaged.

**9. Do human rights requirements form part of your business agreements and contracts? (Yes/No)**

Yes. ABREL ensures that human rights requirements are an integral part of business agreements and contracts across all segments. Its human rights policy also extends protective measures to safeguard the human rights of contractors and suppliers. This policy reinforces a responsible and ethical supply chain through adherence to human rights standards at every operational level. Through this comprehensive approach, the Company strengthens its operational framework while promoting a culture of respect and accountability within its wider network of partners.

**10. Assessments of the year**

	% 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%

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
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.**

In the assessments conducted during the financial year, ABREL did not identify any significant risks or concerns.

**Leadership Indicators**

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

In the reporting period, ABREL did not encounter any human rights-related complaints, and therefore, no amendments to existing practices or policies were required.

**2. Details of the scope and coverage of any human rights due diligence conducted**

No. ABREL has not yet conducted comprehensive human rights due diligence. However, recognising the importance of systematically analysing and mitigating risks amid evolving business and regulatory circumstances, the Company is implementing measures to ensure thorough human rights due diligence across all business segments. This proactive effort reflects ABREL's commitment to upholding human rights, aligning with international standards and enhancing its ability to address potential risks effectively.

**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?**

Yes. ABREL acknowledges the significance of complying with the Rights of Persons with Disabilities Act, 2016 and is actively supporting the needs of individuals with disabilities. Most of its establishments offer accessible features for differently abled individuals, including visitors. These include PWD-friendly entrances, wheelchair availability, Braille systems, and tactile pavers.

While the Real Estate business segment does not encompass dedicated plants or factories, ABREL prioritises inclusivity within its office spaces and project sites by implementing accessibility measures. In addition, its residential projects incorporate comprehensive accessibility features to accommodate the needs of people with disabilities, reflecting the Company's commitment to inclusivity.

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

	Real Estate	Pulp and Paper
Sexual harassment	1.17%	0
Discrimination at workplace	1.17%	0
Child labour	1.17%	0
Forced/involuntary labour	1.17%	0
Wages	0	0

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

All contractors and sales partners in the Real Estate division are assessed based on their performance and practices as per the Code of Conduct applicable to all the suppliers and contractors. No significant risks were identified during the financial year.

**PRINCIPLE 6**

Businesses should respect and make efforts to protect and restore the environment

According to this principle, businesses must recognise that social responsibility and sustainable economic growth depend on environmental stewardship. It urges companies to adopt environmental policies and procedures that reduce or eliminate the negative effects of business operations and supply chains.

ABREL understands the intrinsic link between business operations and the environment. The Company embraces its duty to respect, protect, and restore the environment, acknowledging that

the long-term success of its operations depends on a healthy ecosystem. This initiative outlines ABREL's strategy for managing its environmental efforts.

As a socially responsible corporate entity, ABREL prioritises sustainable practices across its operations. The Company is also committed to implementing effective and efficient resource management strategies to ensure responsible consumption and production patterns.

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

Parameter	Unit	FY 2025–26 (Current financial year)	FY 2024–25 (Previous financial year)
<b>From renewable sources</b>			
Total electricity consumption (A)	Terajoule (TJ)	21.54	23.80
Total fuel consumption (B)	TJ	6,286.05	5,948.11
Energy consumption through other sources (C)	TJ	-	-
<b>Total energy consumed from renewable sources (A + B + C)</b>	TJ	6,307.59	5,971.91
<b>From non-renewable sources</b>			
Total electricity consumption (D)	TJ	46.26	99.04
Total fuel consumption (E)	TJ	9,042.53	9,579.41
Energy consumption through other sources (F)	TJ	-	-
<b>Total energy consumed from non-renewable sources (D + E + F)</b>	TJ	<b>9,088.79</b>	<b>9,678.45</b>
<b>Total energy consumed (A + B + C + D + E + F)</b>	TJ	<b>15,396.38</b>	<b>15,650.36</b>
Energy intensity per rupee of turnover (Total energy consumed/revenue from operations)	TJ/lakhs ₹	0.044	0.035
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/revenue from operations adjusted for PPP)*	TJ/lakhs (adjusted for PPP)	0.89	0.73
Energy intensity in terms of physical output	TJ/sq.m. (Real Estate)	0.00022	0.00014
	TJ/MT (Pulp and Paper)	0.034	0.035

\*For FY 2025–26 calculation, the revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2025 by the International Monetary Fund (IMF) for India, which is 20.34. (Source: <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC>)

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

Yes. Limited assurance has been carried out by TUV India Pvt. Ltd.



**2. Does the entity have any sites/facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Yes/No) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.**

Yes. The sites operated by ABREL under the Pulp and Paper segment have been recognised as Designated Consumers (DCs) under the Government of India's Perform, Achieve and Trade (PAT) Scheme. During PAT cycle-I and cycle-II, targets were exceeded by 17.26% and 12.38%, respectively. Furthermore, PAT cycle-VII was completed in the last financial year, and the target was missed by 4.49%. As a remedial measure, 10868 Energy Saving Certificates will be purchased following notification from Bureau of Energy Efficiency (BEE).

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

Parameter	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	0	0
(ii) Groundwater	11,168,701.40	1,14,00,496.00
(iii) Third-party water (Municipal water supplies and water tankers)	2,34,182.13	1,57,804.90
(iv) Seawater/desalinated water	0	0
(v) Others (recycled/treated Water)	1,686.54	3,883.68
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	<b>1,14,04,570.06</b>	<b>1,15,62,184.58</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>41,19,453.56</b>	<b>41,25,513.32</b>
<b>Water intensity per rupee of turnover</b> (Total water consumption/revenue from operations) (kL/lakhs ₹)	11.75	9.27
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)*</b> (Total water consumption/revenue from operations adjusted for PPP) (kL/lakhs ₹; adjusted for PPP)	239.07	191.52
Water intensity in terms of physical output (Real Estate) (kL/sq.m.)	0.87	0.58
Water intensity in terms of physical output (Pulp and Paper) (kL/MT)	8.54	8.86

\*For FY 2025-26, revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2025 by the IMF for India which is 20.34

(Source: <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC>)

**Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Yes. Limited assurance has been carried out by TUV India Pvt. Ltd.

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

Parameter	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
<b>(i) To Surface water</b>		
- No treatment	0	0
- With treatment – Primary and Secondary treatment through Sewage treatment plant	72,71,921.00	74,27,325.00

Parameter	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
<b>(ii) To Groundwater</b>		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>(iii) To Seawater</b>		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>(iv) Sent to third-parties (municipality)</b>		
- No treatment		0
- With treatment – Primary and Secondary treatment through Sewage treatment plant	13,195.50	9,346.26
<b>(v) Others</b>		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>Total water discharged (in kilolitres)</b>	<b>72,85,116.50</b>	<b>74,36,671.26</b>

**Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Yes. Limited assurance has been carried out by TUV India Pvt. Ltd.

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

Yes. Birla Centurion, one of the Company's key sites, operates as a Zero Liquid Discharge (ZLD) facility, and a feasibility study for its implementation across the commercial portfolio is currently underway. The Company also manages water responsibly through Sewage Treatment Plants (STPs) and Effluent Treatment Plants (ETPs), reusing treated water for flushing and landscaping. Additionally, all Real Estate projects incorporate rainwater harvesting systems to reduce freshwater dependency and support groundwater recharge.

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

Parameter	Please specify unit	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
NOx	(Metric Tonnes) MT	0.67	0.56 <sup>R#</sup>
SOx	MT	0.25	0.27 <sup>R#</sup>
Particulate Matter (PM)	MT	0.97	0.97 <sup>R#</sup>
Persistent Organic Pollutants (POP)	MT	-	-
Volatile Organic Compounds (VOC)	MT	-	-
Hazardous Air Pollutants (HAP)	MT	-	-

<sup>R#</sup>The Pulp and paper values were reported in kg, although the unit was incorrectly stated as MT. The restatement reflects the same.

**Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Yes. Limited assurance has been carried out by TUV India Pvt. Ltd.

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

Parameter	Unit	FY 2025–26 (Current financial year)	FY 2024–25 (Previous financial year)
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	(Metric Tonnes CO <sub>2</sub> equivalent) MTCO <sub>2</sub> e	8,76,547.77	9,25,173.06
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	MTCO <sub>2</sub> e	9,201.36	19,899.39
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions/revenue from operations)	MTCO <sub>2</sub> e/lakhs ₹	2.53	2.12
<b>Total Scope 1 and Scope 2 emission intensity adjusted for Purchasing Power Parity (PPP)*</b> (Total Scope 1 and Scope 2 GHG emissions/revenue from operations adjusted for PPP)	MTCO <sub>2</sub> e/lakhs ₹ (adjusted for PPP)	51.40	43.87
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	MT CO <sub>2</sub> e/sq.m. (Real Estate)	0.025	0.016
	MT CO <sub>2</sub> e/MT (Pulp and Paper)	1.93	2.10

\*For FY 2025–26 calculation, revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2025 by the IMF for India which is 20.34

(Source: <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC>)

**Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Yes. Limited assurance has been carried out by TUV India Pvt. Ltd.

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

Yes. In FY 2025–26, ABREL undertook several projects to reduce GHG emissions across its Real Estate and Pulp and Paper divisions, spanning low-carbon construction, renewable energy transition, energy efficiency, and process optimisation.

**Low-Carbon Construction and Embodied Carbon (Real Estate):**

- Replaced conventional construction materials with approximately 4,711 MT of Ground Granulated Blast Furnace Slag (GGBS)
- Utilised 10,906 MT of Fly Ash, 984 MT of Fly Ash bricks, in construction activities

- Incorporated 3,863 MT of secondary steel across projects
- Avoided construction-related embodied emissions through the use of lower-carbon materials

**Renewable Energy Transition:**

- Renewable electricity accounted for 32% of the total electricity consumption while 45% reduction in total electricity consumption was achieved across operations
- Transitioned commercial assets such as Birla Aurora and Birla Centurion entirely to renewable electricity
- Newly commissioned a 140 kW rooftop solar installation at Birla Centurion

- Reduced Scope 2 emissions by 53.05% across the organisation through the use of energy efficiency measures and use of renewable energy while Scope 1 emissions reduced by 5.26% over the previous fiscal year

**Renewable Fuel Substitution:**

- Scaled up biomass fuel utilisation, including black liquor, bagasse, pith, bark, wood dust, and perul, consuming 6286.05 TJ of renewable fuel energy, a 6% YoY increase from previous year while total non-renewable fuel consumption went down by 6% YoY
- Generated 623 MT of Compressed Methane Gas (CMG) through the in-house biomethanation plant and supplied 28,940 GJ of clean thermal energy as a substitute for LPG through CMG generation in Pulp and Paper division

**Energy Efficiency Initiatives:**

- Achieved cumulative electricity savings across both divisions through targeted efficiency measures
- Installed VFDs on HVAC systems, pumps, agitators, and rewinder systems
- Retrofitted LED lighting and motion sensor-based controls across operational areas and labour camps

- Upgraded APFC panels and capacitors to reduce energy losses
- Optimised compressor operations through the installation of a high-efficiency centrifugal compressor
- Improved boiler thermal efficiency via MP heater commissioning, resulting in considerable steam savings
- Enhanced pulp consistency at one of the Board Lines, yielding additional energy savings

**Green Building Certifications (Real Estate):**

- Ensured all new projects comply with IGBC Gold or equivalent certification standards
- Achieved India's first BREEAM certification for a residential development at Birla Niyaara

**Plantation at Pulp and Paper:**

- Expanded the social forestry programme by planting 2.22 Crore saplings supporting long-term carbon sequestration and sustainable fibre sourcing
- Aligned these initiatives with ABREL's Natural Capital commitments and the ABG's Net-Zero by 2050 roadmap

Note – For further details refer Principle 6 Leadership Indicator 4

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

Parameter	FY 2025–26 (Current financial year)	FY 2024–25 (Previous financial year)
<b>Total waste generated (in metric tonnes)</b>		
Plastic waste (A)	1,222.28	1,229.49
E-waste (B)	0.32	0
Bio-medical waste (C)	0.22	0.02
Construction and demolition waste (D)	13,664.95	14,400.00
Battery waste (E)	2.48	0.66
Radioactive waste (F)	0	0
Other hazardous waste. Please specify, if any. (G)	48,639.41	40,785.48
Other non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)	2,95,198.03	2,48,140.64
<b>Total (A + B + C + D + E + F + G + H)</b>	<b>3,58,727.69</b>	<b>3,04,556.29</b>
<b>Waste intensity per rupee of turnover</b> (Total waste generated/revenue from operations) (MT/lakhs ₹)	1.02	0.68



Parameter	FY 2025–26 (Current financial year)	FY 2024–25 (Previous financial year)
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)*</b> (Total waste generated/revenue from operations adjusted for PPP) (MT/lakhs ₹; adjusted for PPP)	20.81	14.14
<b>Waste intensity in terms of physical output (Real Estate)</b> (MT/sq. m.)	0.05	0.05
<b>Waste intensity in terms of physical output (Pulp and Paper)</b> (MT/MT of production)	0.76	0.65
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	1,288.9	1,297.65 <sup>R#</sup>
(ii) Re-used	3,43,600.60	2,88,657.50
(iii) Other recovery operations	0	0
<b>Total</b>	<b>3,43,679.04</b>	<b>2,90,163.38</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	8.80	8.70
(ii) Landfilling	13,420.72	14,384.50
(iii) Other disposal operations	264.38	208.23 <sup>R#</sup>
<b>Total</b>	<b>13,693.90</b>	<b>14,393.22</b>

R#Waste disposal and waste recovered through recycling, reuse or other recovery options data has been updated for FY 2024–25 due to recategorisation of municipality from recycling to other recovery options.

\*For FY 2025–26 calculation, the revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2025 by the IMF for India, which is 20.34.

(Source: <https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC>)

**Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Yes. Limited assurance has been carried out by TUV India Pvt. Ltd.

**10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your Company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.**

ABREL follows a circular economy approach anchored in the 3R strategy: Reduce, Reuse, and Recycle. During FY 2025–26, 95% of total waste generated was diverted from disposal through internal reuse and recycling via verified vendors and authorised handlers. All waste disposal practices comply with applicable environmental regulations.

Across operations, waste streams including C&D waste, biogenic materials, fly ash, lime sludge, and ETP sludge are reused internally or redirected to authorised recovery channels. At one project site, all C&D waste generated at the site was internally reused during the reporting period. Recycled materials such as glass, fly ash, and GGBS are used as cement substitutes across projects, and low-VOC and green-certified materials are standard across construction and fit-out stages. Organic waste converters installed at commercial properties process food and biodegradable waste into compost. Process-level interventions including improved pH control, tighter chemical dosing, and reduced chlorine dioxide consumption have further lowered the chemical load in effluent streams. In parallel, a feasibility study for IGBC Net Zero Waste Certification is underway for commercial properties. Plastic waste is managed per CPCB EPR guidelines, and hazardous waste is handled exclusively through certified channels.

**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:**

S. no.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval/clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
	ABREL does not operate in any areas that are deemed ecologically sensitive zones, thereby ensuring environmental preservation and sustainable practices.		

**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 the project	EIA notification no.	Date	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant weblink
Niyaara	EC identification no.:EC25B3813MH5985052N Proposal no.:SIA/MH/INFRA2/560215/2025	24 <sup>th</sup> March, 2026	Yes	Yes	<a href="https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=SIA%2FMH%2FINFRA2%2F560215%2F2025&amp;proposal=749115378">https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=SIA%2FMH%2FINFRA2%2F560215%2F2025&amp;proposal=749115378</a>
Taranyaa	EC identification no.:EC25B3813MH5643576N Proposal no.:SIA/MH/INFRA2/548968/2025	19 <sup>th</sup> December, 2025	Yes	Yes	<a href="https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=SIA%2FMH%2FINFRA2%2F548968%2F2025&amp;proposal=134518655">https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=SIA%2FMH%2FINFRA2%2F548968%2F2025&amp;proposal=134518655</a>
Pravaah (Sector-71)	EC identification no.:EC25C3801HR5618210N File no:21/04/2025-IA.III	3 <sup>rd</sup> November, 2025	Yes	Yes	<a href="https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=IA%2FDL%2FINFRA2%2F518657%2F2025&amp;proposal=117609537">https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=IA%2FDL%2FINFRA2%2F518657%2F2025&amp;proposal=117609537</a>
Punya	EC identification no.:EC25B3812MH5940215N File no.:SIA/MH/INFRA2/549945/2025	12 <sup>th</sup> February, 2026	Yes	Yes	<a href="https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=SIA%2FMH%2FINFRA2%2F488218%2F2024&amp;proposal=84813898">https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=SIA%2FMH%2FINFRA2%2F488218%2F2024&amp;proposal=84813898</a>
Evam	EC identification no.:EC25B3813MH5503742N Proposal no.:SIA/MH/INFRA2/478659/2024	8 <sup>th</sup> October, 2025	Yes	Yes	<a href="https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=SIA%2FMH%2FINFRA2%2F478659%2F2024&amp;proposal=73256188">https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=SIA%2FMH%2FINFRA2%2F478659%2F2024&amp;proposal=73256188</a>

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

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

Yes. ABREL complies with all pertinent environmental laws, regulations, and guidelines in India, including the Water (Prevention and Control of Pollution) Act of 1974, the Air (Prevention and Control of Pollution) Act of 1981, the Environment (Protection) Act of 1986, along with their associated rules and regulations.



## Leadership Indicators ▶

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

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

(i) **Name of the area:** Bengaluru and NCR

(ii) **Nature of operations:** Building constructions

(iii) **Water withdrawal, consumption, and discharge in the following format:**

Parameter	FY 2025–26 (Current financial year)	FY 2024–25 (Previous financial year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	0	0
(ii) Groundwater	528.70	672
(iii) Third-party water	78,422.98	37,608.41
(iv) Seawater/desalinated water	0	0
(v) Others – Recycled water/treated water	1,686.54	3,294.68
<b>Total volume of water withdrawal (in kilolitres)</b>	<b>80,638.22</b>	<b>41,575.09</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>80,638.22</b>	<b>41,575.09</b>
<b>Water intensity per rupee of turnover (Total water consumption/revenue from operations) (kL/lakhs ₹)</b>	0.23	0.09
<b>Water intensity (optional) – the relevant metric may be selected by the entity</b>	-	-
<b>Water discharge by destination and level of treatment (in kilolitres):</b>		
<b>(i) Into surface water</b>		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>(ii) Into groundwater</b>		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>(iii) Into seawater</b>		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>(iv) Sent to third-parties</b>		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>(v) Others</b>		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>Total water discharged (in kilolitres)</b>	<b>0</b>	<b>0</b>

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

Parameter	Unit	FY 2025–26 (Current financial year)	FY 2024–25 (Previous financial year)
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	MTCO <sub>2</sub> e	2,02,712.30	2,02,106.60
<b>Total Scope 3 emissions per rupee of turnover</b>	MTCO <sub>2</sub> e/lakhs ₹	5.83	1.75
<b>Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity</b>	MTCO <sub>2</sub> e/Sq. m	0.76	0.74

Note - Scope 3 emissions inventory has been developed for Real Estate operations only, reflecting the proposed divestment of the Pulp and Paper division during the reporting period.

## 3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct &amp; indirect impact of the entity on biodiversity in such areas along with prevention and remediation activities.

ABREL does not operate in any areas that are deemed ecologically sensitive zones, thereby supporting environmental preservation and sustainable practices.

## 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:

S. no.	Initiative undertaken	Details of the initiative (Weblink, if any, may be provided along with summary)	Outcome of the initiative
1	Targeted energy savings and avoided emissions in Pulp and Paper operations	The Pulp and Paper division (Century Pulp and Paper, Lalkua) executed a structured portfolio of various energy-efficiency projects in FY 2025–26 across Powerhouse, Fiber Line, Pulp Mill, Recovery, Tissue, PGP, Board, and Paper Machines (PM-1 to PM-5). Key initiatives included: 43 MW TG overhauling, Boiler #8 APH tube replacement, blow-down heat recovery at boilers, replacement of plug-screw DC drive with AC drive, VFDs on white-liquor transfer pumps, AHU motors, broke-tower and DM transfer pumps, vacuum pump downsizing (180 kW→75 kW) at PM-2, IE-3 motor replacements, conversion of motors from delta to star, CLO <sub>2</sub> -plant chiller and steam optimisation, APH level-switch automation, and large-scale LED and lighting-transformer voltage optimisation.	These projects delivered combined annual savings of ≈59,08,847 kWh of electrical energy and ≈ 81,951 MT of steam (thermal) – together equivalent to ≈22,928 MT of coal avoided per annum. In terms of avoided emissions, ≈55,960.53 MTCO <sub>2</sub> e were avoided through these efficiency initiatives (4,470.83 tCO <sub>2</sub> e from electrical savings + 51,489.70 tCO <sub>2</sub> e from steam savings*). Steam savings additionally reduced direct fuel firing in boilers, lowering Scope 1 emissions and improving overall energy intensity and operational sustainability.
2	Circular thermal energy through biomethanation of process waste in the Pulp and Paper segment	The in-house bio-methanation plant continued operations through FY 2025–26, converting high-organic-content effluent from bagasse-based pulping into methane-rich biogas. The biogas was compressed to Compressed Methane Gas (CMG) and used directly in boilers as a renewable fuel, replacing LPG and partially substituting coal. The system uses anaerobic digestion for energy recovery and is fully integrated with site operations, reinforcing internal circularity.	Generated 623.14 MT of CMG, producing 28,940 GJ of renewable energy. The intervention reduced Scope 1 emissions, lifted the renewable share of the thermal mix, cut waste, and reinforced ABREL's circular, low-carbon manufacturing strategy.



S. no.	Initiative undertaken	Details of the initiative (Weblink, if any, may be provided along with summary)	Outcome of the initiative
3	Biomass fuel integration for thermal energy	The Pulp and Paper division further scaled biomass-derived fuels black liquor, bagasse, wood bark, pith and perul across boiler operations to replace coal and LPG. Fuels are sourced internally from pulping/fibre by-products and through local agri-supply chains, creating a circular and locally embedded thermal-energy model.	Enabled consumption of 62,86,054.44 GJ of renewable thermal energy from biomass. Without this, an equivalent quantum would have come from coal, generating substantially higher Scope 1 emissions. The substitution further strengthened ABREL's shift towards circular, low-emission energy systems.
4	Renewable electricity adoption across business divisions	During FY 2025–26, ABREL continued to scale renewable electricity sourcing as a central pillar of its decarbonisation strategy. Within the Real Estate division, Birla Aurora ran on 100% renewable electricity (IGBC Net Zero Energy Building) avoiding 2,200 tCO <sub>2</sub> annually and Birla Centurion operationalised a 140 kW on-site solar PV plant.	ABREL procured/generated 21,535.45 GJ of renewable electricity through solar PVs in FY 2025–26. In terms of emissions avoided of 1,768.66 tCO <sub>2</sub> in the Real Estate division and 2,514.51 tCO <sub>2</sub> in the Pulp and Paper division which otherwise would have come from the grid, resulting in increased Scope 2 emissions.
5	Use of climate-friendly materials in Real Estate projects	The Real Estate division advanced its embodied-carbon strategy across flagship projects (Birla Niyaara, Trimaya, Tisya, Centurion, Vanya, Punya, and Aurora among others) by deploying GGBS, fly ash, fly-ash bricks and secondary (recycled) steel in place of OPC, clinker and virgin steel. GGBS, a steel-industry by-product, was used as partial cement substitute to lower hydration heat and improve durability. Detailed Embodied Carbon Assessment was initiated for 7 residential projects, with an in-house tool developed to quantify embodied emissions across sites.	In FY 2025–26, the division consumed 4,711.17 MT of GGBS, 10,905.85 MT of fly ash, 3,862.65 MT of secondary steel and 984.35 MT of fly-ash bricks totalling 20,464 MT of recycled material (vs. 20,206.7 MT in FY 2024–25). These substitutions delivered ≈13,883.51 MT CO <sub>2</sub> e of avoided emissions in FY 2025–26 (Fly Ash: 10,284.17 MT; GGBS: 3,599.34 MT; Secondary Steel: 3862.65 MT; Fly Ash Bricks: 218.53 MT - using EFs of 942.996, 764, 890 and 222 respectively).
6	Reduction in transport emissions through onsite concrete batching	At Birla Niyaara, the Real Estate division operated a dedicated on-site concrete batching plant through FY 2025–26 to eliminate the diesel-intensive transport of ready-mix concrete from external plants. By localising batching, the project reduced idle time, improved material handling and inventory control, and tightened quality assurance. The same approach is being studied for replication at other large residential sites.	The initiative reduced fuel consumption and Scope 3 transport emissions, enabled faster, more energy-efficient construction cycles, and improved material utilisation. It contributed to the Real Estate division's broader strategy of cutting embodied carbon during construction and demonstrated the impact of early-stage planning in low-carbon construction.
7	Achievement of Net Zero Energy Building at Birla Aurora	Birla Aurora, the division's flagship commercial property in Worli, retained its IGBC Net Zero Energy Building (NZEB) certification along with IGBC Platinum (Existing Buildings) and BEE Energy Rating. The achievement is enabled through 100% renewable electricity sourcing, APFC panel upgrades with capacitor automation, VFDs on HVAC cooling towers (dynamic speed control on ambient temperature), and full LED retrofits across building zones.	These initiatives delivered ≈2,200 MT CO <sub>2</sub> avoided annually at Birla Aurora through green-energy use and operational efficiency. APFC optimisation reduced reactive power loss, and HVAC VFDs delivered measurable energy savings during non-peak months. The certification reinforces the division's leadership in sustainable real estate and sets a benchmark for low-carbon commercial infrastructure.

S. no.	Initiative undertaken	Details of the initiative (Weblink, if any, may be provided along with summary)	Outcome of the initiative
8	Water efficiency and wastewater circularity across the Real Estate portfolio	Water-stewardship principles are embedded across operational and construction phases, with all projects designed to meet/exceed IGBC Gold standards. Standardised interventions include low-flow plumbing fixtures, dual-plumbing, rainwater harvesting, and decentralised STPs. Birla Aurora and Birla Centurion reuse 100% of treated water from on-site STPs for flushing, irrigation and HVAC make-up. Birla Centurion is a Zero Liquid Discharge (ZLD) facility, with rainwater tanks, recharge pits and AC-condensate reuse. Birla Navya reuses RO reject and AC condensate. Construction-phase circularity at Birla Tisya, Bengaluru uses STP-treated water for curing, dust suppression and tyre washing through labour-camp STPs.	Water intensity across Birla Estates fell from 0.92 in FY 2022–23 to 0.61 kL/sq.m. in FY 2025–26. Total water withdrawal stood at 2,43,430 kL. Recycled-sewage water use grew sharply as well during the fiscal year. In water-stressed regions, groundwater withdrawal was held to <1% of total demand, with 78,422 kL met via authorised third-party sources and 1,686 kL of treated water reused. Birla Centurion remained ZLD; key sites earned full IGBC water-efficiency credits.
9	Water reuse and effluent reduction through 55 water-saving initiatives	Century Pulp and Paper continued its plant-wide water-reuse programme in FY 2025–26 across eight thematic categories: clarified and back-water reuse, condensate and effluent recirculation, gland and sealing-water recovery, shower and spray-water optimisation, soft-water loop integration, hood-cleaning reuse, log-washing reuse and ash-belt reuse. Decentralised recovery loops were engineered for site-specific flows in the pulp mill, board plant, WPP, tissue line and chemical-recovery units, with surplus treated water diverted to plantation irrigation.	The 55 initiatives enabled internal reuse/recovery of water and groundwater withdrawal has been reduced from 41.49 m <sup>3</sup> /ton FY 2014–15 to 24.70 m <sup>3</sup> /ton FY 2025–26, significantly reducing fresh-water intake and effluent discharge volumes. They enhanced process-stream water efficiency, improved operational stability and reduced load on the central ETP, contributing to long-term water security and circularity at the divisional level.
10	Dynamic waste management across Real Estate construction and operations	A lifecycle-driven waste strategy was implemented across active construction sites and operational commercial assets. Construction & Demolition (C&D) waste was 13,665 MT in FY 2025–26, with project-level strategies focused on source-minimisation (material optimisation, sequencing during design) and on-site reuse (reclaimed aggregates used for internal roads, PCC works, water barricades, levelling particularly at Birla Trimaya and Birla Niyaara). At Birla Centurion, legacy vermi-pits were replaced with a high-efficiency Organic Waste Converter (OWC) with 1,100 kg/day capacity. Hazardous waste (used oil, filters, contaminated cotton, diesel cans) was disposed only through authorised vendors; 100% of plastic and battery waste was recycled under EPR and Battery Waste Management Rules.	In FY 2025–26: 63.02 MT of organic waste was processed into compost via OWCs (used internally for landscaping); 99.5 MT of C&D waste was reused on-site a 563.33% increase versus FY 2024–25 (15.5 MT); 2.02 MT of battery waste was 100% disposed through buy-back arrangements; 5.46 MT of hazardous waste was routed to authorised recyclers/incineration; and 337.5 MT of non-hazardous waste was managed through authorised vendors. Total waste handled: ~14,007 MT, with zero waste sent to underground disposal and zero environmental non-compliance.



S. no.	Initiative undertaken	Details of the initiative (Weblink, if any, may be provided along with summary)	Outcome of the initiative
11	Near-Zero waste diversion through circular waste management in the Pulp and Paper division	The Pulp and Paper division continued its circular waste-management framework in FY 2025-26 across hazardous and non-hazardous streams. Biogenic by-products (wet and dry pith, sawdust, bark), the bulk of non-hazardous waste were reused almost entirely within internal production. ETP and DIP sludge from the hazardous stream was reused in manufacturing. Trace wastes (used oil, oil filters, diesel barrels) were safely recycled or incinerated. Plastic waste was 100% recycled via authorised EPR vendors; battery waste was 100% disposed through certified channels.	2,94,873 MT of biogenic non-hazardous waste was reused in production, 48,628 MT of hazardous waste was diverted from disposal through in-process reuse and authorised treatment, and 100% of plastic and battery waste was recycled in line with EPR/Battery Waste Management Rules driving an overall waste-diversion rate of ≈100%. This underscores the division's commitment to sustainable manufacturing, regulatory compliance and material circularity at scale.

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

Yes. ABREL has a Business Continuity Plan (BCP) informed by Business Impact Assessments (BIA) to identify and mitigate risks to critical assets and processes. A senior-led Business Continuity Management (BCM) team oversees its integration with governance. To ensure employee preparedness, the Company conducted regular training, drills, and awareness programmes. In addition, proactive communication with internal and external stakeholders supports cohesive plan execution across the business.

**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?**

No significant adverse environmental impacts were identified across ABREL's value chain during FY 2025-26. As a preventive measure, approximately 100% of procurement is sourced domestically, reducing supply chain emissions. In addition, supplier onboarding includes due diligence on environmental

compliance, and procurement favours recycled, low-impact, and sustainably sourced materials. To further strengthen its value chain oversight, the Company is in the process of formalising supplier environmental assessments going forward.

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

During the reporting period, the Real Estate division has initiated an Environmental Due Diligence process for its suppliers and value chain with identification of key suppliers already done within the reporting period.

**8. How many Green Credits have been generated or procured:**

- a. By the listed entity
- b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners

During the reporting period, ABREL did not generate or procure any Green Credits. Moreover, based on the information available, none of the Company's top ten value chain partners, based on the value of purchases and sales, generated or procured Green Credits during the same period.

**PRINCIPLE 7**

Businesses, when engaging in influencing public and regulatory policy, should do so in a manner, that is responsible and transparent

The guiding concept of this principle acknowledges that the Company operates within predetermined national and international legal and policy frameworks. It further recognises the legitimacy of engaging with governments to influence policies that promote public welfare.

In this context, ABREL actively participates in several trade organisations and industry-wide forums. Through these platforms, the Company addresses sectoral concerns and shares initiatives aimed at protecting and advancing stakeholder interests.

The Company is also dedicated to upholding ethical business practices, fostering sustainability,

promoting social stability, and championing human rights. Through collaboration with trade associations, governmental bodies, and similar platforms, ABREL advocates for these values and supports programmes that align with its values.

ABREL's efforts related to Principle 7 of the NGRBC closely align with the SDGs, particularly those promoting development partnerships. This principle also encompasses broad areas such as reducing inequalities, creating sustainable cities and communities, and taking climate action, reflecting the Company's commitment to impactful global progress.

**SDG Linkages**



**Essential Indicators** ▶

**1. a. Number of affiliations with trade and industry chambers/associations.**

The Company is affiliated with 14 trade and industry chambers.

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

S. no.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National)
1	CREDAI-MCHI (Maharashtra Chamber of Housing Industry)	State
2	NAREDCO West Foundation	National
3	Federation of Indian Exports Organisation	National
4	Indian Paper Manufacturers Association	National
5	Confederation of Indian Industry (CII)	National
6	National Safety Council	National
7	Bureau of Indian Standards (BIS)	National
8	CIDC - Construction Industry Development Council	National
9	IGBC - Indian Green Building Council	National

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

Name of authority	Brief of the case	Corrective action taken
The Company does not have any adverse orders against issues related to anti-competitive conduct during this financial year.		

**Leadership Indicators** ▶

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

S. no.	Public policy advocated	Method resorted for such advocacy	Whether information available in the public domain? (Yes/No)	Frequency of review by board (Annually/half-yearly/quarterly/others – please specify)	Weblink, if available
1	In FY 2025–26, ABREL has not advocated any public policy. However, as a responsible company, it recognises its duty to support laws that create positive social impact. To guarantee efficient governance and improve social and environmental circumstances, the Company concentrates on establishing and maintaining mutually beneficial connections with the government, regulators, trade unions, investors, suppliers, and communities.				

**PRINCIPLE 8**

**Businesses should promote inclusive growth and equitable development**

The principle encourages companies to innovate and contribute to the nation's growth, with a particular focus on vulnerable groups, while also acknowledging their entrepreneurial abilities. Reiterating the interdependence of corporate success, equitable development, and inclusive growth is the ideology of this principle.

In line with this principle, ABREL remains dedicated to creating a positive impact on local communities through its business operations. In the Pulp and Paper segment, particularly in Uttarakhand, the Company sources raw materials locally, capitalising on plentiful resources like bagasse and pine leaves, which are supplied by local women. This approach supports both economic development within the community and sustainable practices. Moreover, ABREL prioritises sourcing from local farmers

and engages with suppliers of wood from cloned Eucalyptus plants, thereby further strengthening community ties.

In addition to these practices, the Company actively implements a range of CSR initiatives aimed at improving health, skill development, and education within the communities it serves. These efforts align seamlessly with Principle 8 of the NGRBC, which emphasises the growth and development of nearby communities. They also resonate with several SDGs, including zero hunger, good health and wellbeing, quality education, decent work and economic growth, among others. Through these strategic initiatives, ABREL not only enhances its corporate responsibility but also plays a vital role in fostering sustainable community advancement.

**SDG Linkages**





## 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 the project	SIA notification no.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant weblink
Birla Evam	NA	NA	Yes	No	NA
Birla Taranya	NA	NA	Yes	No	NA

Note: The Social Impact Assessment was conducted for two projects in relation to investor requirements and the results are not made public due to no statutory provisions requiring companies to make this information publicly available.

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

S. no.	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 2025-26 (in ₹)
--------	--	-------	----------	---	--------------------------	---

During the reporting period, no projects required Rehabilitation and Resettlement (R&R).

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

ABREL recognises that timely and transparent grievance redressal is foundational to maintaining trust with the communities in which it operates. The Company has established structured mechanisms to facilitate open dialogue, ensure concerns are systematically captured, and drive resolution through accountable processes.

Community members may raise grievances through multiple accessible channels, including dedicated forums, regular site-level meetings with Company representatives, and complaint drop boxes installed

at project site entry points. All complaints received are logged in a comprehensive grievance register, enabling systematic tracking, monitoring, and resolution.

Dedicated personnel are assigned across business segments to manage community grievances and ensure timely closure. Where required, ABREL engages with local authorities, community leaders, and relevant stakeholders to arrive at contextually appropriate and mutually beneficial solutions. This structured yet collaborative approach reinforces the Company's commitment to maintaining open, responsive, and accountable relationships with the communities it serves.

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

		FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Real Estate	Directly sourced from MSMEs/small producers	1.58	0.57 <sup>R#</sup>
	Directly from within India	100	100
Pulp and Paper	Directly sourced from MSMEs/small producers	2.6	42.62
	Directly from within India	70.83	76.10

<sup>R#</sup>The data has been restated due to error in calculation associated with FY 2024-25 data pertaining to total input material sourced.

## 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:

Location	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Rural	0	0
Semi-urban	50	59
Urban	0	0
Metropolitan	50	41

## Leadership Indicators ▶

## 1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
--	-------------------------

The Social Impact Assessment was conducted for two projects in relation to investor requirements and the results are not made public due to no statutory provisions requiring companies to make this information publicly available.

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

S. no	State	Aspirational district	Amount spent (in ₹)
1	Uttarakhand	Udham Singh Nagar	14,52,472
2	Bihar	Gaya	60,000
		Katihar	60,000
3	Chhattisgarh	Bastar	60,000
4	Jharkhand	Bokaro	1,80,000
		Chatra	60,000
		Lohardaga	60,000
5	Karnataka	Bijapur	60,000
6	Odisha	Balangir	60,000
7	Uttar Pradesh	Chandauli	1,20,000
		Fatehpur	60,000

## 3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalised/vulnerable groups? (Yes/No)

Within ABREL's both businesses preferential procurement policy has been applicable to its Pulp and Paper business segment, which has since been divested. Following the divestment, ABREL is in the process of operating as a pure-play real estate developer, and the Company is currently assessing the design and applicability of a preferential procurement framework suited to its real estate operations and supply chain structure. In the interim, ABREL continues to prioritise engagement with MSMEs and domestic suppliers across its contractor and vendor ecosystem, and is in the process of formally designating marginalised and vulnerable groups relevant to its current business context. A structured preferential procurement policy for the Real Estate business is being developed and is expected to be formalised in the coming year.

## PRINCIPLE 9

Businesses should engage with and provide value to their consumers in a responsible manner

This principle requires businesses to offer customers safe, accessible products and services while ensuring responsible engagement throughout the customer relationship.

ABREL serves both B2B and B2C segments and places customer responsiveness at the centre of

its product development approach. The Company uses structured feedback mechanisms, including Net Promoter Score (NPS) surveys, to understand evolving customer needs and drive continuous improvement in product design and service delivery.

### SDG Linkages



**(b) From which marginalised/vulnerable groups do you procure?**

ABREL's procurement base across businesses comprises small and local suppliers, intermediaries, and Micro, Small, and Medium Enterprises (MSMEs). The Company is currently in the process of formally identifying and designating marginalised and vulnerable groups relevant to its operations, with a view to embedding greater equity into its supply chain framework.

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

2.05%

**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:**

S. no.	Intellectual property based on traditional knowledge	Owned/acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit share
NA. ABREL has not acquired any intellectual property based on traditional knowledge for any of its businesses.				

**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, since ABREL has not acquired any intellectual property based on traditional knowledge for any of its businesses.		

**6. Details of beneficiaries of CSR projects:**

S. no	CSR project	No. of persons benefited from CSR Projects	% of beneficiaries from vulnerable and marginalised groups
1	Preventive and curative health services in communities	6,000	Most of the CSR activities and projects undertaken by the Company are specifically targeted towards vulnerable and marginalised groups in society. However, presently, it is challenging to provide an accurate percentage of beneficiaries from these groups. Nevertheless, the Company remains committed to supporting and uplifting these sections of society through its CSR initiatives.
2	Healthcare and sanitation provisions	29,707	
3	Promoting education	426	
4	Rural infrastructure development projects	16,500	
5	Promotion of sports	5,000	
6	Animal husbandry	500	
7	Project Neemar - Assisted living for distressed girls	300	
8	Real Estate project - Wall mural paintings	-	

## Essential Indicators ▶

**1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

ABREL has established a strong framework for receiving and addressing consumer complaints and feedback, ensuring customised support, effective complaint resolution, and a seamless customer experience across all business segments.

In the Real Estate segment, the Company employs a dedicated Customer Relationship Management (CRM) team to engage with customers from the post-sale phase through to the handover. For this engagement, the team uses advanced systems such as a customer-facing app, SAP-Cloud for Customer, and instant messaging chatbots. Furthermore, relationship managers are actively assigned to manage and resolve any complaints or issues that may arise, ensuring personalised attention and swift resolution.

Within the Pulp and Paper segment, ABREL deploys dedicated personnel to meticulously investigate customer feedback. In the event of receiving negative feedback, it is promptly registered and categorised based on its nature, such as technical, marketing, or quality related. This structured categorisation enables thorough internal discussions, after which the customer is either compensated or provided with a product replacement.

Together, these measures reaffirm ABREL's commitment to high customer satisfaction. The Company also focuses on fostering long-term relationships through responsive service and solutions that respect customer concerns and improve their experience.

**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	
	Real Estate	Pulp and Paper
Environmental and social parameters relevant to the product	100	
Safe and responsible usage	100	
Recycling and/or safe disposal	100	

**3. Number of consumer complaints in respect of the following:**

	FY 2025-26 (Current financial year)		Remarks	FY 2024-25 (Previous financial year)		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0	NA	0	0	NA
Advertising	1	0	Resolved with no adverse order passed against BEPL	0	0	NA
Cybersecurity	0	0	NA	0	0	NA
Delivery of essential services	0	0	NA	0	0	NA
Restrictive trade practices	0	0	NA	0	0	NA
Unfair trade practices	0	0		0	0	NA
Other	10	22	These matters primarily pertain to grievances related to unit booking cancellations, forfeiture of earnest money due to customer non-payment, refunds, allotment, and amenities, and are currently pending before the Consumer Redressal Forum.	4	15	Major cases relate to unit booking cancellations and forfeiture of earnest money due to customer non-payment. These matters are currently pending before the district Consumer Redressal Commission.

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

	Number	Reasons for recall
Voluntary recalls	NA	NA
Forced recalls	NA	NA



**5. Does the entity have a framework/policy on cybersecurity and risks related to data privacy? (Yes/No) If available, provide a weblink of the policy.**

Yes. ABREL has established a comprehensive Privacy and Cybersecurity framework aimed at safeguarding personally identifiable information (PII), ensuring data integrity, and mitigating risks associated with digital and information security. This framework governs the collection, processing, storage, and transfer of personal data, in alignment with applicable regulatory requirements and industry best practices.

The Company's approach to cybersecurity is supported by strong technical and organisational safeguards, including the deployment of encryption protocols, regular testing of system effectiveness, and controlled access mechanisms. To ensure effective oversight, ABREL has clearly defined responsibilities

for the management of data privacy and cybersecurity. These responsibilities are led by designated personnel, including the Chief Information Officer (CIO), who is responsible for the effectiveness and continuous improvement of information security infrastructure.

The Privacy Policy on ABREL's website outlines the Company's protocols for protecting user data. It details several key aspects, including:

- The types of personal data collected and processed
- Purpose of data collection
- Use of cookies and analytics
- Transfer of PII within the Group entities
- Data retention and user rights under applicable data protection laws
- Measures taken to ensure data security and respond to grievances or suspected breaches

Furthermore, ABREL commits to not selling or marketing personal data to third parties. It also ensures that any third-party vendors accessing PII are required to treat such data with appropriate levels of protection.

The Privacy Policy, which serves as a key pillar of ABREL's data protection and cybersecurity governance, can be accessed through this link:

<https://www.adityabirlarealestate.com/privacy-policy>

**6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cybersecurity and data privacy of consumers; re-occurrence of instances of product recalls; penalty/action taken by regulatory authorities on safety of products/services.**

NA. There were no such instances during FY 2025–26.

**7. Provide the following information relating to data breaches:**

**a. Number of instances of data breaches along with impact**

Nil

**b. Percentage of data breaches involving personally identifiable information of consumers**

NA

**c. Impact, if any, of the breaches**

NA

**Leadership Indicators**

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

Each business segment of ABREL has thoughtfully curated sections on its website, offering comprehensive insights into its diverse array of products and services. These dedicated sections are created to provide detailed information, allowing stakeholders and customers to explore the full spectrum of offerings available.

By ensuring that ample resources and information are readily accessible, ABREL demonstrates its commitment to transparency, customer engagement, and informed decision-making. Through this structured presentation, the Company enhances user experience and reinforces its dedication to excellence across all areas of its business operations.

The websites are listed below:

Real Estate: <https://www.birlaestates.com/mumbai.aspx>

Pulp and Paper: <https://www.centurypaperindia.com/product-b2b>

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

**Real Estate**

In the past year, ABREL has advanced its customer education efforts through significant digitalisation of its CRM processes, achieving 81% digitalisation across operations and 80% KPI tracking via systems. Furthermore, the introduction of a comprehensive ticketing system has markedly reduced response times, while standardised Email communications and educational videos enhance customer engagement.

The customer app and portal facilitate access to essential information on products and services, fostering informed and responsible usage. Continuous training and system improvements further ensure optimal utilisation of these tools. In addition, enhancements like the ticketing system demonstrate ABREL's commitment to sustainable practices and customer satisfaction through responsive and informed service delivery.

**Pulp and Paper**

ABREL's Pulp and Paper division promotes safe and responsible usage of its products by empowering consumers with vital information and guidance. The division's website serves as a comprehensive resource, offering detailed usage guidelines to inform and educate consumers about best practices.

In addition to online resources, the Company actively engages with its customers through informative meetings, providing deeper insights into the safe handling and utilisation of its products. This personalised approach facilitates a thorough understanding of product safety among consumers. Simultaneously, ABREL enhances the consumer experience by including a detailed product booklet with each purchase, which serves as an invaluable reference for ensuring correct and responsible use. This multi-channel approach underscores its dedication to safety and customer satisfaction.

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

NA. ABREL's products do not fall under the category of essential services.

**4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/NA) If yes, provide details in brief.**

No

**5. Did your entity carry out any survey about consumer satisfaction relating to the major products/services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

In the Real Estate division, ABREL has implemented Customer Satisfaction Survey (CSAT), aligned with the commencement of project handovers. The objective of this exercise was to systematically capture client feedback on key parameters such as product quality, design, and service experience. Consequently, the insights gathered through the survey are being documented and analysed to drive continuous improvement and ensure that future offerings remain aligned with evolving customer expectations.



## CONCLUSION

This BRSR provides stakeholders with a comprehensive view of ABREL's non-financial performance, covering the Company's approach to ethical practices, sustainable sourcing, and operational responsibility across its Real Estate and Pulp and Paper segments. ABREL continues

to strengthen its disclosures and deepen its sustainability commitments year on year. Through transparent reporting, proactive stakeholder engagement, and alignment with the NGRBC Principles, the Company aims to build lasting trust and contribute to long-term, resilient value creation.



# TÜVINDIA

## Independent Assurance Statement

To,  
Aditya Birla Real Estate Limited,  
Century Bhavan, Dr. Annie Besant Road,  
Worli, Mumbai-400 030, India.

Aditya Birla Real Estate Limited (hereafter "ABREL") engaged TÜV India Private Limited (TUVI) to conduct an independent external limited assurance engagement over the BRSR disclosures covering the nine BRSR principles, including Essential and applicable Leadership Indicators, and selected GRI disclosures for the reporting period April 01, 2025 to March 31, 2026. TUVI assured ABREL's Integrated Annual Report / Sustainability Report (hereinafter referred to as 'the Report'). The scope explicitly excludes value-chain disclosures, BRSR Core KPIs covered under a separate reasonable assurance engagement, forward-looking targets, projections, ambitions and financial figures except where referenced from audited financial statements for contextual purposes. The assurance engagement covered BRSR disclosures as per Annexure II - Format of BRSR, as stipulated in:

- SEBI Circular SEBI/HO/CFD/CMD-2/P/CIR/2021/562 dated 10 May 2021;
- SEBI Master Circular HO/49/14/14(7)2025-CFD-POD2/1/3762/2026 dated 30 January 2026; and
- GRI Standards 2021.

The assurance engagement over the BRSR disclosures and the selected GRI disclosures was conducted as a limited assurance engagement in accordance with ISAE 3000 (Revised): Assurance Engagements Other than Audits or Reviews of Historical Financial Information. ABREL prepared the BRSR disclosures with reference to the following criteria:

- The National Guidelines on Responsible Business Conduct (NGRBC);
- SEBI circular SEBI/HO/CFD/CMD-2/P/CIR/2021/562, dated 10 May 2021;
- The subsequent notification SEBI/LAD-NRO/GN/2023/131 dated 14 June 2023, related to BRSR reporting requirements;
- SEBI Master Circular HO/49/14/14(7)2025-CFD-POD2/1/3762/2026 dated 30 January 2026
- GRI Standards 2021.

This assurance engagement was carried out with reference to the BRSR framework, GRI Standards 2021 and ISAE 3000 (Revised), in line with the terms of our engagement and the applicable assurance criteria.

### Management's Responsibility

ABREL developed the content of its BRSR disclosures covering the nine BRSR principles, including Essential and applicable Leadership Indicators, and selected GRI disclosures. ABREL management is responsible for the collection, analysis, preparation and disclosure of the information presented in the BRSR, including availability in web-based and printed formats. This responsibility includes maintaining the website where the Integrated Annual Report / Sustainability Report is published; however, website integrity controls were not subject to TUVI assurance procedures. Management is responsible for ensuring that disclosed data is accurate, complete and free from material misstatement, whether due to fraud or error, in line with the applied criteria referenced in the BRSR and GRI Standards 2021. ABREL is also responsible for archiving and reproducing the disclosed information and making such data available to relevant stakeholders and regulatory authorities upon request.

### Scope and Boundary of Assurance Engagement

The scope of this limited assurance engagement covered verification of ABREL's BRSR disclosures across the nine BRSR principles and the selected GRI Standards 2021 disclosures listed in this Statement. The engagement did not include BRSR Core KPIs, value-chain disclosures, prospective information, financial figures, website integrity controls, ITGC, cybersecurity controls or data-governance controls.

The assurance engagement included the following procedures:

1. Review of General Disclosures, Management and Process Disclosures, and ABREL's responses to the nine BRSR principles;
2. Review of Essential and applicable Leadership Indicators specified under Annexure II - Format of BRSR, excluding BRSR Core KPIs covered separately;
3. Assessment of the quality, clarity and completeness of information reported within the agreed scope;
4. Verification of supporting evidence on a risk-based sample basis; and
  - o Limited assurance procedures over the nine BRSR principles and selected GRI disclosures listed in this Statement.

This approach was aligned with ISAE 3000 (Revised) and provided a basis for an independent limited assurance conclusion on the disclosures within the agreed scope.

[www.tuv-nord.com/in](http://www.tuv-nord.com/in)

TÜV®

TÜVNORDGROUP



# TUVINDIA

TUVI verified the Essential and Leadership Indicators disclosed in the BRSR as listed below:

Principles	Essential Indicators	Leadership Indicators
Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.	1,2,3,4,5,6,7,8,9	1, 2
Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe.	1,2,3,4	1,2, 3
Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains.	1,2,3,4,5,6,7,8,9,10,11,12, 13,14,15	1,2,3,4, 5, 6
Principle 4: Businesses should respect the interests of and be responsive to all their stakeholders.	1,2	1,2,3
Principle 5: Businesses should respect and promote human rights.	1,2,3,4,5,6,7,8,9,10, 11	1,2,3, 4, 5
Principle 6: Businesses should respect and make efforts to protect and restore the environment.	1,2,3,4,5,6,7,8,9,10,11,12, 13	1,2,3,4, 5, 6,7, 8
Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.	1,2	1
Principle 8: Businesses should promote inclusive growth and equitable development.	1,2,3,4, 5	1,2,3, 4, 5, 6
Principle 9: Businesses should engage with and provide value to their consumers in a responsible manner	1,2,3,4,5,6, 7	1,2,3, 4

TUVI verified the GRI disclosures listed below under a limited assurance engagement in line with ISAE 3000 (Revised). The selected disclosures were determined based on ABREL's materiality assessment, stakeholder relevance, ESG impacts, regulatory expectations and alignment with GRI Standards 2021 reporting principles.

Topic	Indicator	GRI Disclosure
Water & Effluents	Water withdrawal	303-3
	Water discharge	303-4
	Water consumption	303-5
Waste	Waste Generated	306-3
	Waste diverted from disposal	306-4
	Waste directed to disposal	306-5
Emissions	Direct (Scope 1) GHG emission	305-1
	Energy indirect (Scope 2) GHG emission	305-2
	GHG emission intensity	305-4
	Nitrogen Oxides (NOx), Sulphur Oxides (SOx), and other significant air emissions	305-7
Energy	Energy consumption within the organization	302-1
	Energy Intensity	302-3
Occupational Health and Safety	Occupational health and safety Management system	403-1
	Worker participation, consultation, and communication on occupational health and safety	403-4
	Workers covered by an occupational health and safety management system	403-8
	Work-related injuries	403-9
Employment	Work-related ill health	403-10
	New Employee Hire & Turnover Details	401-1
	Benefits provided to full-time employees that are not provided to temporary or part-time employees	401-2
Training and Education	Parental leaves	401-3
	Average hours of training per year per employee	404-1
	Programs for upgrading employee skills and transition assistance programs	404-2
Local Communities	Percentage of employees receiving regular performance and career development reviews	404-3
	Operations with local community engagement, impact assessments, and development programs	413-1

The reporting boundary for the selected BRSR and GRI disclosures includes Aditya Birla Real Estate Limited (ABREL) and ABREL's wholly owned subsidiary, Birla Estates Private Limited.

Onsite verification was conducted at ABREL Corporate Office and Birla Aurora at Century Bhavan, Dr. Annie Besant Road, Worli, Mumbai - 400030, Maharashtra, India on 16 and 17 April 2026.

Desk review procedures were performed for the remaining sites within the defined reporting boundary. Site selection was based on a risk-based approach considering materiality, operational relevance, data aggregation points, stakeholder sensitivity and availability of source evidence. The onsite locations selected represent the operations most material to the assured disclosures and the principal points of quantitative data aggregation within the reporting boundary. Consistent with the risk-based and materiality-driven nature of a limited assurance engagement, verification coverage was determined by the significance and risk of the disclosures rather than by a fixed numerical proportion of sites or data.

### Limitations of the Assurance Engagement

- Prospective Information: TÜV India Private Limited (TUVI) did not perform assurance procedures on any forward-looking statements disclosed in the BRSR, including but not limited to targets, expectations, ambitions, or projections. Accordingly, no conclusions are drawn with respect to the accuracy or achievability of such prospective information.

[www.tuv-nord.com/in](http://www.tuv-nord.com/in)

TÜV®

TUVNORDGROUP

# TUVINDIA

- Scope and Data Verification: During the assurance process, TUVI did not encounter any limitations in relation to the agreed scope of the engagement. However, the assurance procedures were conducted on a sample basis, and TUVI did not verify ESG goals or claims beyond the defined scope. The responsibility for the authenticity, accuracy, and completeness of the data and disclosures rests solely with ABREL.
- Third-Party Use and Risk: Any reliance placed by any person or third party on the Integrated Annual Report / Sustainability Report or this assurance statement is entirely at their own risk. TUVI assumes no responsibility or liability in this regard.
- Financial Data: TUVI has referred to financial figures as disclosed in ABREL's audited financial statements. The appropriate application and interpretation of this financial data in the BRSR is the responsibility of ABREL.
- Regulatory Applicability: The application of this assurance statement is strictly limited to the regulatory requirements as specified in:
  - SEBI Circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated 12 July 2023;
  - SEBI Master Circular HO/49/14/14(7)2025-CFD-POD2/1/3762/2026 dated 30 January 2026
- Environmental and Social Product Claims: This assurance statement does not endorse or validate any environmental or social claims made by the reporting organization concerning products, manufacturing processes, packaging, disposal practices, or promotional content. TUVI does not permit the use of this statement to support greenwashing or misleading environmental/social claims.
- Legal Compliance: It is the sole responsibility of the reporting organization to ensure compliance with applicable laws, regulations, and standards.

### TUVI's Responsibility in the Assurance Engagement

The responsibility of TÜV India Private Limited (TUVI) in this engagement was to perform limited assurance procedures over:

- BRSR disclosures across the nine principles as per Annexure II - Format of BRSR; and
- Selected GRI disclosures listed in this Statement.

This assurance engagement was conducted in reference to the international standard ISAE 3000 (Revised): Assurance Engagements Other than Audits or Reviews of Historical Financial Information, specifically for non-financial information.

Our procedures were designed to provide assurance on the disclosures within the agreed scope of work and did not extend to an evaluation of:

- The adequacy or effectiveness of ABREL's ESG strategies or management systems,
- The overall sufficiency or completeness of the Report against the principles of the GRI Standards, or
- Any information not explicitly included within the defined scope of this assurance.

TUVI's engagement included sample-based verification of non-financial quantitative and qualitative information, comprising:

- Limited assurance over the nine BRSR principles; and
- Limited assurance over selected GRI disclosures.

This assurance is based on the assumption that all data and information provided by ABREL were accurate, complete, and reliable at the time of the assessment. TUVI does not independently verify the source data beyond the agreed scope.

The intended user of this assurance statement is the management of ABREL. The responsibility for the authenticity and accuracy of the underlying data lies solely with ABREL, including the obligation to archive the relevant data for a reasonable period.

Disclaimer of liability: TUVI disclaims liability for decisions made by any person or entity based on this Statement and for consequences arising from inaccurate, incomplete or misleading data provided by ABREL, except to the extent agreed under the engagement terms.

### Assurance Methodology

During the assurance engagement, sampling was conducted on a risk-based and judgmental basis. All identified misstatements, errors, and discrepancies were evaluated against the quantitative and qualitative materiality thresholds established for this engagement. The aggregate of uncorrected misstatements was assessed to be below the established materiality threshold of 5%. Qualitative materiality factors included regulatory relevance, stakeholder sensitivity, nature of disclosure, estimation uncertainty and potential influence on intended users. TUVI focused procedures on disclosures and issues of high material relevance to ABREL and its stakeholders, with the objective of assessing the reliability of non-financial information within the agreed limited assurance scope.

TUVI's assurance activities included:

- Document and Data Review
  - Examination of documents, datasets and supporting evidence provided by ABREL for the nine BRSR principles listed in Annexure II - Format of BRSR and the selected GRI disclosures;
  - Evaluation of disclosures related to Management Approach and performance indicators.
- Stakeholder Interviews
  - Conducted interviews with key representatives, including data owners, process managers, and decision-makers across various departments.

[www.tuv-nord.com/in](http://www.tuv-nord.com/in)

TÜV®

TUVNORDGROUP



# TUVINDIA

- b) Reviewed ABREL's approach to stakeholder engagement and materiality determination to validate qualitative statements included in the Report.
  - c) Interviews were conducted through both onsite visits and remote assessments, as applicable.
3. Process and System Assessment
- a) Sample-based review of systems and processes for:
    - o Implementing ESG and sustainability-related policies, as described in the BRSR.
    - o Collecting, managing, and reporting both quantitative data and qualitative information for the reporting period.
  - b) Assessment of the internal controls supporting data accuracy, traceability, and consistency.
4. Reporting Framework Adherence
- a) Verified ABREL's adherence to reporting requirements under:
    - o SEBI's BRSR guidelines, and
    - o GRI Standards (Global Reporting Initiative).

**GRI Evaluation Criteria:** TUVI evaluated the selected GRI disclosures against applicable GRI reporting principles and quality expectations, including stakeholder engagement, materiality, completeness, neutrality, relevance, sustainability context, accuracy, reliability, comparability, clarity and timeliness. This methodology enabled TUVI to provide a balanced and evidence-based limited assurance conclusion while maintaining alignment with ISAE 3000 (Revised).

### Action Plan

The following improvement areas were identified and shared with ABREL. These recommendations are aligned with the existing objectives and initiatives of ABREL management. The assurance team endorses the continued implementation of these initiatives to support the advancement of the organization's sustainability goals:

- i. ABREL may further strengthen its internal ESG performance by adopting a smart data management system and complementing the same with periodic internal data and performance reviews;
- ii. ABREL may consider monitoring all categories of indirect greenhouse gas (GHG) emissions in accordance with ISO 14064-1 standards.
- iii. Based on the review of ABREL's current water management practices, ABREL may consider progressively evaluating the feasibility of Zero Liquid Discharge (ZLD) at applicable facilities, subject to operational and technical considerations.

### Conflict of Interest

TUVI confirms its independence and impartiality for this engagement in accordance with SEBI BRSR assurance expectations, the IESBA Code of Ethics and TUVI's internal conflict-of-interest controls. TUVI did not provide consulting, advisory, system design, data preparation or implementation services relating to ESG or BRSR to ABREL during the reporting period; was not involved in preparation of the BRSR or underlying data; and is not aware of relationships or circumstances that could create a conflict of interest or impair independence. Independence safeguards included segregation of responsibilities, independent technical review and documented conflict-of-interest checks.

### Assurance Conclusion

**BRSR limited assurance conclusion:** Based on the procedures performed, nothing has come to our attention that causes us to believe that the selected BRSR disclosures across the nine principles, including Essential and applicable Leadership Indicators within the agreed scope, were not prepared, in all material respects, in accordance with Annexure II - Format of BRSR and the applicable BRSR reporting criteria.

**Competency and Independence:** TUVI confirms its competence to conduct this assurance engagement in accordance with SEBI guidelines and ISAE 3000 (Revised). The assurance team possesses relevant expertise in ESG verification, BRSR, GRI Standards 2021, assurance methodology and sector-specific sustainability reporting. Independence and impartiality safeguards were maintained throughout the engagement.

**GRI limited assurance conclusion:** Based on the procedures performed, nothing has come to our attention that causes us to believe that the selected GRI disclosures listed in this Statement were not prepared, in all material respects, in accordance with the applicable GRI Standards 2021 reporting criteria.

### Evaluation of BRSR Principles

- a) Governance, Leadership, and Oversight:  
The Integrated Annual Report / Sustainability Report includes messages from top management, the business model aimed at promoting inclusive growth and equitable development, along with related actions and strategies. It also presents ABREL's stated focus areas, including services, risk management practices, environmental protection and restoration efforts, and organizational priorities.
- b) Connectivity of Information:  
ABREL has presented the nine Principles as per Annexure II - Format of BRSR. The report provides information on the inter-relatedness and dependencies of these principles with factors influencing the organization's ability to create value over time.

[www.tuv-nord.com/in](http://www.tuv-nord.com/in)

TÜV®

TUVNORDGROUP

# TUVINDIA

### c) Stakeholder Engagement:

The report provides information on the mechanisms adopted by ABREL for engaging with key stakeholders and identifying their concerns and priorities. It also includes information on stakeholder relationships and how stakeholder needs and interests are considered in the organization's approach.

### d) Materiality:

Material issues related to the nine principles and corresponding KPIs, as required by the BRSR framework, have been identified and reported. The reported material issues are based on ABREL's materiality assessment process, which considered relevant stakeholder categories, operational context, regulatory expectations, and ESG-related impacts.

### e) Conciseness:

The report presents the required information in a structured manner using brief descriptions, tables, graphs, and pictorial representations, where applicable, to support clarity and continuity of information.

### f) Reliability and Completeness:

ABREL has represented that internal systems are in place for data aggregation and review. TUVI's assurance team verified selected samples of data covering material KPIs across the reporting boundary on a risk-based basis. Based on the procedures performed and evidence reviewed, nothing has come to the attention of TUVI that causes it to believe that the sampled information contains any material misstatement.

### g) Consistency and Comparability:

Information in the BRSR is presented on an annual basis and provides comparative information, where applicable. Based on the limited assurance procedures performed, no material inconsistency was observed in relation to the sampled information reviewed.

**Independence and Code of Conduct:** TUVI follows the IESBA Code of Ethics, which adopts a threats-and-safeguards approach to independence. Independence declarations and conflict-of-interest safeguards are consolidated in the Conflict of Interest section above.

**Quality management:** The assurance team complies with quality management requirements, ensuring that the engagement partner has requisite expertise and that the assigned team collectively has the competence to perform the engagement in accordance with applicable standards and regulations. The assurance team follows the fundamental principles of integrity, objectivity, professional competence, due care, confidentiality and professional behaviour. In accordance with International Standard on Quality Management (ISQM1), TUVI maintains a system of quality management including documented policies and procedures for compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### GRI Reporting Evaluation

Based on the procedures performed for the selected GRI disclosures, nothing has come to our attention that causes us to believe that the disclosures were not prepared, in all material respects, in accordance with the applicable GRI Standards 2021 reporting criteria. TUVI did not perform assurance procedures on prospective information such as targets, expectations or ambitions and therefore expresses no conclusion on such information.

**Universal Standard:** ABREL followed GRI 1: Foundation 2021: Requirements and principles for using the GRI Standards; GRI 2: General Disclosures 2021: Disclosures about the reporting organization. General Disclosures were followed when reporting information about an organization's profile, strategy, ethics and integrity, governance, stakeholder engagement practices, and reporting process and GRI 3: Material Topics 2021: Disclosures and guidance about the organization's material topics. GRI3 was selected for Management's Approach on reporting information about how an organization manages a material topic.

TUVI reviewed the selected disclosures with reference to the applicable GRI Standards 2021 criteria used by ABREL for reporting.

**Topic-Specific Standards:** The relevant Topic-specific Standards from the 300 series (environmental topics) and 400 series (social topics) were used by ABREL to report information on environmental and social impacts within the selected scope.

**Stakeholder Inclusiveness:** Stakeholder identification and engagement has been carried out by ABREL on a periodic basis to bring out the material topics raised by key stakeholders identified through ABREL's stakeholder engagement process. These disclosures were reviewed within the agreed scope of this limited assurance engagement.

**Sustainability Context:** Based on the procedures performed, ABREL has disclosed the relationship between ESG and organizational strategy within the Report. The ESG context disclosures were reviewed within the agreed scope of this limited assurance engagement.

**Materiality:** The materiality assessment process was carried out with reference to GRI Standards, considering topics internal and external to ABREL's range of businesses. The Report describes the selected material topics and respective boundaries within the agreed scope.

**Stakeholder engagement:** TUVI reviewed ABREL's responses to material topics, including disclosures on policies, management systems and governance, within the agreed scope.

[www.tuv-nord.com/in](http://www.tuv-nord.com/in)

TÜV®

TUVNORDGROUP

## TUVINDIA

**Impact:** ABREL communicates its ESG performance through regular, transparent internal and external reporting throughout the year, aligned with BRSR, GRESB, GRI as part of its policy framework that include POSH, ESG, Code of Conduct Policy, Whistle Blower Policy etc. ABREL reports on ESG performance to Board of Directors, who oversees and monitors the implementation and performance of objectives, as well as progress against goals and targets for addressing ESG related issues. ABREL has disclosed the process of establishing contemporary goals and targets against which performance is intended to be monitored and disclosed periodically.

**Completeness:** The Report discloses selected non-financial KPIs, as per the GRI Standards and the agreed assurance scope. The completeness of the selected disclosures was reviewed within the agreed scope of this limited assurance engagement.

**Reporting Principles for defining report quality:** TUVI verified selected samples of data and information during onsite and remote procedures in accordance with the agreed scope and risk-based sampling approach. The disclosures related to ESG issues and performance are reported in a balanced and clear manner in terms of content and presentation.

**Reliability:** TUVI's assurance team verified selected samples of data and information and did not identify any material misstatement in the information reviewed. Inaccuracies identified during verification, where attributable to transcription, interpretation or aggregation errors, were corrected by ABREL before conclusion. With reference to GRI Standards and the limited assurance engagement, nothing has come to TUVI's attention that causes it to believe that the selected ESG data and information reviewed were not reliable in all material respects.

### Our Assurance Team and Independence

TUVI is an independent, neutral third-party assurance provider with qualified environmental and social specialists. TUVI confirms that there was no conflict of interest for this assurance engagement and that it was not involved in preparation of the BRSR or the underlying data. This statement is consistent with the consolidated independence declaration above.

For and on behalf of TUV India Private Limited



Manojkumar Borekar  
Product Head - Sustainability Assurance Service  
TUV India Private Limited



Date: 01/06/2026  
Place: Mumbai, India  
Project Reference No: 8124858547