

SANMIT INFRA LIMITED

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

FY-2024-25



ANNEXURE- VII

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

FY 2024-25

About The Company

Established in 2000, Sanmit Infra Ltd. is a dynamic and diversified company engaged in multiple critical sectors, including petroleum product supply, bio-medical waste recycling, infrastructure and real estate development, and most recently, bitumen emulsion and road construction materials.

Driven by a mission where passion and innovation are at the core, the Company has consistently evolved to meet the needs of modern infrastructure, environmental sustainability, and energy demands.

Sanmit Infra is committed to responsible business practices, combining operational excellence with long-term value creation. The Company's petroleum and biomedical waste businesses serve critical industrial and public health functions. The new bitumen and bituminous by-products manufacturing segment contributes significantly to road infrastructure development across India

In alignment with its commitment to transparency and ethical growth, Sanmit Infra Ltd. presents its Business Responsibility and Sustainability Report (BRSR), pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. Overall, the Company's adherence to the BRSR framework reflects its steadfast dedication to operating as a socially responsible, inclusive, and transparent organization, contributing to sustainable development within the parameters of BRSR.

In this report, the terms 'Sanmit', 'Sanmit Infra', 'We', 'Company', and 'Our' refer to Sanmit Infra Ltd.

Note: The numbers are rationalised in this year's report, wherever required.

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity:

1. **Corporate Identity Number (CIN) of the Listed Entity** - L70109MH2000PLC288648
2. **Name of the Listed Entity** – Sanmit Infra Limited
3. **Year of incorporation** - 2000
4. **Registered office address** – 601, Makhija Royale, 6th Floor, S.V. Road, Khar (W) Mumbai City MH 400052 IN
5. **Corporate address** - 601, Makhija Royale, 6th Floor, S.V. Road, Khar (W) Mumbai City MH 400052 IN
6. **E-mail** – info@sanmitinfraltd.com, sanmitinfra@gmail.com
7. **Telephone** - 022-67429100, 022-25557474, 9223400434
8. **Website** - www.sanmitinfraltd.com
9. **Financial year for which reporting is being done** – FY 2024- 25
10. **Name of the Stock Exchange(s) where shares are listed :**

Name of the Exchange	Stock Code
BSE Ltd.	532435

11. **Paid-up Capital** – ₹ 15,80,07,500
12. **Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report** –
    Mr. Sanjay Makhija
    Ph. No: 9223400434
    Email: sanmitinfra@gmail.com
13. **Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).** – All the disclosures made in this report are on a standalone basis for Sanmit Infra Ltd.
14. **Name of assessment or assurance provider** – Not Applicable for the reporting period as per SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dt. 28th March 2025.
15. **Type of assessment or assurance obtained** – Not Applicable for the reporting period as per SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dt. 28th March 2025.

II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Mining and quarrying	Trading of Petroleum Products	86.98%
2.	Manufacturing	Repair & installation of machinery & equipment, motor vehicles	0.08%
3.	Manufacturing	Manufacturing of Bitumen Emulsion	12.94%

S. No.	Product/ Service	NIC Code	% of Turnover contributed
1	Trading of Petroleum Products	46610	86.98%
2	Repair & installation of machinery & equipment, motor vehicles	33190	0.08%
3	Manufacturing of Bitumen Emulsion	19209	12.94%

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

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	03*	01	04
International	00	00	00

* Workshop at Wadala, Maharashtra, Plant at Rasayani, Maharashtra and Storage yard at Balasore, Odisha

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

a. Number of locations

Locations	Number
National (No. of States)	02*
International (No. of countries)	00

*

Maharashtra and Odisha

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

No export activities were undertaken by the Company during the current financial year.

c. A brief on types of customers:

The Company serves a diverse customer base that includes private limited companies, leading players in the steel industry, and municipal corporations. It also works with the Health Department of the Government of Maharashtra, as well as NHAI approved contractors and PWD approved contractors.

IV. Employees

20. **Details as at the end of Financial Year:**

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	**Permanent (D)**	38	27	71.05	11	28.95
2.	**Other than Permanent (E)**	00	00	0.00	00	0.00
3.	**Total employees (D + E)**	38	27	71.05	11	28.95
WORKERS						
4.	**Permanent (F)**	00	00	0.00	00	0.00
5.	**Other than Permanent (G)**	12	12	100.00	00	0.00
6.	**Total workers (F + G)**	12	12	100.00	00	0.00

b. Differently abled Employees and workers:

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						

1.	**Permanent (D)**	00	00	0.00	00	0.00
2.	**Other than Permanent (E)**	00	00	0.00	00	0.00
3.	**Total differently abled employees (D + E)**	00	00	0.00	00	0.00
DIFFERENTLY ABLED WORKERS						
4.	**Permanent (F)**	00	00	0.00	00	0.00
5.	**Other than permanent (G)**	00	00	0.00	00	0.00
6.	**Total differently abled workers (F + G)**	00	00	0.00	00	0.00

21. Participation/Inclusion/Representation of women

	Total (A)	**No. and percentage of Females**	
		No. (B)	**% (B / A)**
Board of Directors	08	01	12.50%
Key Management Personnel	02	01	50.00%

* KMP includes CFO and CS. The CFO is also part of the Board of Directors.

22. Turnover rate for permanent employees and workers (in percent)

	FY 2024-25			**FY 2023-24**			**FY 2022-23**		
	Male	**Female**	**Total**	**Male**	**Female**	**Total**	**Male**	**Female**	**Total**
Permanent Employees	16.33	27.27	19.72	22.73	42.11	28.57	30.00	47.06	35.09
Permanent Workers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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

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

S. No	**Name of the holding/ subsidiary/ associate companies/ joint ventures (A)**	**Indicate whether holding/ Subsidiary/ Associate/ Joint Venture**	**% of shares held by listed entity**	**Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)**
The Company does not have any subsidiary, holding, associate companies or joint venture.				

VI. CSR Details

24. I. Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes

II. **Turnover (in Rs.)** - 1,42,96,20,710.13

III. **Net worth (in Rs.)** - 36,66,71,735.83

VII. Transparency and Disclosures Compliances

25. Complaints/Grievance 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)	FY 2024-25			FY 2023-24		
	(If Yes,then provide web-link for grievance redress policy)	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during theyear	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes, the aggrieved parties can raise their concerns by writing to INFO@sanmit.com	00	00	NA	00	00	NA
Investors (other than shareholders)	NA						
Shareholders	Yes, shareholders can raise grievances through the SEBI SCORES platform (https://scores.sebi.gov.in/). Further, the shareholders also have the option to address	00	00	NA	00	00	NA

	their grievances by writing to INFO@sanmit.com.						
Employees and workers	Yes, the employees and workers can raise their concerns or grievance through multiple channels. They can use the designated email addresses: sanmitinfra@gmail.com and md@sanmitinfraltd.com. Further, employees can directly escalate their grievances to the Directors and senior management.	00	00	NA	00	00	NA
Customers	Customers can raise their complaints through sanmitinfra@gmail.com, or by calling the customer care numbers 022-67429100 or 922340043	00	00	NA	00	00	NA
Value Chain Partners	Yes, the aggrieved value chain partners can raise their concern by writing to INFO@sanmit.com.	00	00	NA	00	00	NA

26. Overview of the entity's material responsible business conduct 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[1]

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Waste and Hazardous Material Management	Risk	Handling and disposal of waste from operations can present significant environmental and health risks if not managed responsibly. Hazardous Waste has the potential to contaminate land and water sources, posing long-term threats to both ecosystems and communities. The Company recognizes that improper storage or disposal practices could also increase regulatory exposure, lead to costly remediation, and damage its reputation.	Sanmit Infra has developed systems to ensure that waste is managed in compliance with regulatory frameworks and in an environmentally responsible manner. To further minimize environmental impact, bitumen is procured in drums, transported to the Rasayani plant, melted, and stored in vertical tanks. The used drums are then responsibly collected, reconditioned, and resold by an authorized vendor, ensuring that recycling and reuse form an integral	Negative *There was no negative financial impact for the reporting year 2024-25

[1] Material issues identified are referred from the Sustainability Accounting Standards Board (SASB) 2023-24 version. SASB Standards are maintained and enhanced by the International Sustainability Standards Board (ISSB). This follows the SASB's merger with the International Integrated Reporting Council (IIRC) into the Value Reporting Foundation (VRF) and subsequent consolidation into the IFRS® Foundation in 2022. The latest standards have been accessed at https://sasb.ifrs.org/ on 25th August, 2025 at 11:10 IST.

				part of the waste management process.	
2.	Workplace Health and Safety	Risk	Due to the inherent risks associated with large-scale operations, workplace safety remains a key area of concern. Accidents can result from heavy machinery, and site hazards, leading to injuries or even fatalities. Inadequate safety practices could also result in penalties, increased compliance costs, and reduced productivity, while undermining employee confidence and morale.	The Company follows a structured approach to workplace safety, certified under ISO 45001:2018 for Occupational Health and Safety Management Systems. Comprehensive safety protocols are in place, supported by regular training sessions and periodic risk assessments. The focus is not limited to compliance but extends to cultivating a culture of awareness and accountability across all levels of the workforce. Continuous identification of hazards and preventive measures ensures operational resilience and a safer environment for employees.	Negative *There was no negative financial impact for the reporting year 2024-25
3.	Labour Practices	Risk	Maintaining stable labour relations is essential to uninterrupted operations. Conflicts over wages, working conditions, or lack of grievance redressal can result in strikes, work stoppages, or reputational setbacks. Operating in regions where labour protections may not always be adequate heightens the importance of fair practices and effective communication with employees.	Sanmit Infra prioritizes fair labour practices by complying with all applicable labour laws and establishing transparent communication channels. Employees can directly raise concerns through designated emails or approach senior management and Directors. A dedicated Whistle-blower Policy provides a confidential mechanism for reporting grievances or misconduct directly to the Audit Committee, ensuring swift investigation and resolution. Furthermore, the Company's facilities have been designed to	Negative *There was no negative financial impact for the reporting year 2024-25

				accommodate employees with disabilities through features like ramps and lifts, reflecting a commitment to inclusivity even in the absence of differently-abled employees at present.	
4.	Energy Management	Risk	Energy costs form a significant part of operational expenses, and reliance on conventional power sources contributes to greenhouse gas emissions. By shifting towards renewable energy, the Company can enhance energy security, reduce costs, and align with global sustainability expectations.	Sanmit Infra has taken steps to integrate clean energy into its operations, with a project underway to install a 130 kW rooftop solar PV plant for captive use, tentatively by the end of 2025. This move will not only lower emissions but also provide long-term cost benefits and strengthen resilience against fluctuations in conventional power supply.	Negative *There was no negative financial impact for the reporting year 2024-25
5.	Community Engagement and CSR	Opportunity	Strong community relations play a pivotal role in sustaining trust and creating long-term social impact. The Company views community well-being as integral to its growth and actively contributes to social development initiatives. Through the Anvi Medical and Educational Foundation, Sanmit Infra supports health and education programs, focusing on human health activities that directly benefit local communities. These initiatives reinforce the Company's commitment to giving back and building positive relationships with	NA	Positive

			stakeholders beyond its business operations.		

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processesput 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									
1. a. Whether your entity's policy/ policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
c. Web Link of the Policies, if available	Please refer the table below:								

Sr. No.	Name of policy	Link to Policy	Which Principles each policies goes into
1	Risk Management Policy	https://sanmitinfraltd.com/wp-content/uploads/2023/08/1.-RISK-MANAGEMENT-POLICY.pdf	P1, P2
2	Nomination & Remuneration Policy	https://sanmitinfraltd.com/wp-content/uploads/2023/08/2.-NOMINATION-AND-REMUNERATION-POLICY.pdf	P1, P5
3	Dividend distribution policy	https://sanmitinfraltd.com/wp-content/uploads/2023/08/3.-DIVIDEND-DISTRIBUTION-POLICY.pdf	P1, P4
4	Policy on Related Party Transactions	https://sanmitinfraltd.com/wp-content/uploads/2023/08/4.-POLICY-FOR-RELATED-PARTY-TRANSACTION.pdf	P1, P7
5	Familiarization program for Independent Directors	https://sanmitinfraltd.com/wp-content/uploads/2023/08/5.-FAMILARIZATION-PROGRAMME-FOR-INDEPENDENT-DIRECTORS.pdf	P1
6	Policy for determining Material Subsidiaries	https://sanmitinfraltd.com/wp-content/uploads/2023/08/6.-POLICY-FOR-DETERMINING-MATERIAL-SUBSIDIARIES.pdf	P1
7	Policy on determination of	https://sanmitinfraltd.com/wp-content/uploads/2023/08/7.-POLICY-FOR-DETERMINATION-OF-MATERIAL-	P1

	Materiality of events	EVENTS.pdf	
8	Corporate Social Responsibility Policy	https://sanmitinfraltd.com/wp-content/uploads/2023/08/8.-CSR-POLICY.pdf	P4, P8
9	Code of Conduct for Non-Executive and Independent Directors	15.CODE-OF-CONDUCT-FOR-NON-EXECUTIVE-DIRECTORS.pdf	P1, P7
10	Code of Conduct for Directors and Senior Management Personnel	https://sanmitinfraltd.com/wp-content/uploads/2023/08/9.-CODE-OF-CONDUCT-FOR-BOARD-AND-SENIOR-MANAGEMENT-PERSONNEL.pdf	P1, P7
11	Whistle blower Policy and Vigil Mechanism Policy	https://sanmitinfraltd.com/wp-content/uploads/2023/08/10.-WHISTLE-BLOWER-POLICY-AND-VIGIL-MECHANISM-POLICY.pdf	P1, P5
12	Human Rights Policy	https://sanmitinfraltd.com/wp-content/uploads/2023/08/11.-HUMAN-RIGHTS-POLICY.pdf	P3, P5
13	Cyber security and Data Privacy	https://sanmitinfraltd.com/wp-content/uploads/2023/08/12.-DATA-PRIVACY.pdf	P9
14	Archival Policy	https://sanmitinfraltd.com/wp-content/uploads/2023/08/13.-ARCHIVAL-POLICY.pdf	P1
15	Code of Practices and Procedures for Unpublished Price Sensitive Information	https://sanmitinfraltd.com/wp-content/uploads/2023/08/14.-CODE-OF-CONDUCT-FOR-UNPUBLISHED-PRICE-SENSITIVE-INFORMATION.pdf	P1
16	Policy on the Terms and Conditions of Appointment of Independent Directors	https://sanmitinfraltd.com/wp-content/uploads/2023/08/16.-TERMS-AND-CONDITIONS-FOR-APPOINTMENT-OF-ID.pdf	P1

2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	No	Yes	No	Yes	No	No	No	Yes

4. Name of the national and international codes/ certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The following certifications have been obtained, for our units- 1. Rasayani Manufacturing Unit ➢ ISO 9001:2015 (Quality Management Systems) (P9) ➢ ISO 45001:2018 (Occupational health and safety management systems) (P3, P5) ➢ ISO/IEC 17025:2017 (General requirements for the competence of testing and calibration laboratories) (P9) 2. Mumbai Corporate Office ➢ ISO 13485:2016 (Medical devices - Quality management systems - Requirements for regulatory purposes) (P9)
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	To strengthen its commitment towards clean energy adoption and reduce dependence on conventional power sources, the Company has been exploring renewable energy solutions. Transitioning to sustainable alternatives not only helps lower greenhouse gas emissions but also contributes to long-term cost efficiency and energy security. In line with this approach, the Company has undertaken a project to install a 130 kW rooftop solar PV plant for captive use, tentatively by the end of 2025.
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	

Governance, leadership and oversight

7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements

At Sanmit Infra, we believe that responsible growth is achieved by balancing business performance with a strong focus on environmental stewardship, social responsibility, and sound governance practices. We remain committed to creating long-term value for our stakeholders by embedding sustainability principles across our operations and aligning our initiatives with evolving global standards. Our approach continues to be guided by transparency, accountability, and a drive to continually improve the way we operate.

As part of this journey, we are advancing our efforts to integrate renewable energy into our processes, with a 130 kW rooftop solar PV plant for captive use planned to be installed tentatively by the end of 2025. We also continue to uphold the highest levels of operational excellence through globally recognized certifications. Our Rasayani Manufacturing Unit is certified to ISO 9001:2015 for Quality Management Systems, ISO 45001:2018 for Occupational Health and Safety Management Systems, and ISO/IEC 17025:2017 for Testing and Calibration Laboratories. Meanwhile, our Mumbai Corporate Office holds certification to ISO 13485:2016 for Medical Devices Quality Management. Looking ahead, we will continue to strengthen our practices, guided by our values, as we strive to build a resilient and sustainable future.

- Mr. Sanjay Makhija
  Managing Director

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Sanjay Makhija Managing Director DIN: 00586770

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.	Yes, the Company has established a Business Responsibility and Sustainability Committee, chaired by Mr. Sanjay Makhija, Managing Director. The committee conducts meetings to address and elaborate on matters pertaining to the Business Responsibility and Sustainability Report, ensuring ethical and transparent disclosures.

10. Details of Review of NGRBCs by the Company:																		
Subject for Review	**Indicate whether review was under taken 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 Above policies and follow up action	The Board and its committees track and evaluate performance against all its policies diligently. Further regular follow-up actions are taken to ensure continuous improvement and alignment with the Company's commitments.									Need basis								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	There were no instances of operational non-compliances reported during the year. The Board of Directors oversees compliance with relevant statutory requirements.									Need basis								

	P1	**P2**	**P3**	**P4**	**P5**	**P6**	**P7**	**P8**	**P9**
11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	Yes, Dhir & Dhir Associates, a reputed law firm, carried out an evaluation to assess how effectively the Company's policies are being implemented, with a primary emphasis on execution efficiency. In addition, respective department and business heads regularly review and assess these policies, with any proposed changes submitted to the management or the Board for approval.								

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

Questions	**P1**	**P2**	**P3**	**P4**	**P5**	**P6**	**P7**	**P8**	**P9**
The entity does not consider the Principles material to its business (Yes/No)	NA	NA	NA	NA	NA	No	NA	NA	NA

The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	NA	NA	NA	NA	NA	No	NA	NA	NA
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	NA	NA	NA	NA	NA	No	NA	NA	NA
It is planned to be done in the next financial year (Yes/No)	NA	NA	NA	NA	NA	Yes	NA	NA	NA

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

Essential Indicators

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

Segment	Total Number of training and awareness programmes held	Topics/ principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	02	During the year, Board members and Key Managerial Personnel (KMPs) were kept informed of various developments related to business operations, regulatory updates, safety matters, and other relevant issues.	100.00
Key Managerial Personnel	02		100.00
Employees other than BoD and KMPs	02	To raise awareness among employees and workers across the group, training programmes were conducted on key topics such as the Code of Conduct, the importance of ethics and integrity in the workplace, health and wellness, and safety awareness.	100.00
Workers	01		100.00

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 *(basis the 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**	**Amount (in INR)**	**Brief of the Case**	**Has an appeal been**

		agencies/ judicial institutions			preferred ? (Yes/No)
Penalty/Fine		BSE Limited	88,500 (inclusive of GST)	Penalty imposed for non-compliance with the requirement of having a woman director on the Board during the first quarter under Regulation 17(1) of SEBI (LODR) Reg, 2015	Yes
Penalty/Fine		BSE Limited	1,54,42,622 (inclusive of GST)	Penalty imposed for Non submission of Reg 23(9) of SEBI (LODR) Reg, 2015 and Late submissions for other Regulations under SEBI (LODR) Reg, 2015. The fine levied pertains to multiple instances of non-compliance.	Yes
Settlement	NIL				
Compounding Fee					
Non-Monetary					
Imprisonment	Directors/ KMPs have not been subjected to any thresholds of the materiality policy[2] for Imprisonment or punishment in the financial year.				
Punishment					

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

Case Details	Name of the regulatory/enforcement

[2] In line with the SEBI LODR (Third Amendment) dated 12th December 2024, the Company will adopt the revised materiality threshold for fines and penalties, as prescribed under Regulation XXXVIII(i)(a)(6), in its Materiality Policy in the upcoming financial year.

	agencies/judicial institutions
Penalty imposed for non-compliance with the requirement of having a woman director on the Board during the first quarter under Regulation 17(1) of SEBI (LODR) Reg, 2015	A waiver application was filed with BSE, and an appeal was simultaneously filed with SAT. Subsequently, BSE waived the penalty amount of ₹88,500/- on 21.04.2025
Penalty imposed for Non submission of Reg 23(9) of SEBI (LODR) Reg, 2015 and Late submissions for other Regulations under SEBI (LODR) Reg, 2015*	A waiver application was filed with BSE, and an appeal was simultaneously filed with SAT.

* The total fine of ₹1,55,46,500 levied on the Company was waived off by BSE on 23rd April 2025. This amount included penalties of ₹84,48,800 for non-compliance in September 2020 and ₹70,97,700 for non-compliance in March 2021.

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

   The Company does not maintain a separate Anti Bribery and Anti-Corruption policy, however, its Code of Conduct includes a Fair Dealing clause that addresses ethical business practices and integrity in all operations.

   https://sanmitinfraltd.com/wp-content/uploads/2023/08/9.-CODE-OF-CONDUCT-FOR-BOARD-AND-SENIOR-MANAGEMENT-PERSONNEL.pdf

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

	FY 2024-25	FY 2023-24
Directors	Nil. No disciplinary action was initiated by any law enforcement agency on grounds of bribery or corruption against any Director, KMP, employee, or worker of the Company during the reporting year.	
KMPs		
Employees		
Workers		

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

	FY 2024-25		FY 2023-24	
	Number	**Remarks**	**Number**	**Remarks**
Number of complaints received in relation to issues of conflict of interest of the	00	NA	00	NA

Directors				
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	00	NA	00	NA

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

Not applicable

8. **Number of days of accounts payables ((Accounts payable *365) / Cost of goods/services procured) in the following format:**[3]

	FY 2024-25	FY 2023-24
Number of days of accounts payables	43.31	20.54

9. **Open-ness of Business**

Provide details of concentration of purchases and sales with trading houses, dealers and related parties along-with loans and advances & investments, with related parties, in the following format:[4]

Parameter	Metrics	FY 2024-25	FY 2023-24
Concentration of Purchases	**a. Purchases from Trading houses as % of total purchases**	0.00	0.00
	b. Number of trading houses where purchases and made from	00	00
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0.00	0.00

[3] The above calculations are in accordance with Part B, Attribute 9 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

[4] The above calculations are in accordance with Part B, Attribute 9 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

Concentration of Sales	**a. Sales to dealers/distributors as % of total sales**	0.00	10.77
	b. Number of dealers/distributors to whom sales are made	00	02
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	0.00	10.77
Share of RPTs in	**a. Purchases (Purchases with related parties/Total Purchases)**	10.16	16.01
	b. Sales (Sales to related parties/Total Sales)	56.51	25.69
	c. Loans & advances (Loans & advances given to related parties/Total loans & advances)	0.00	0.00
	d. Investments (Investments in related parties/Total Investments made)	0.00	0.00

Leadership Indicators

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

Total number of awareness programs held	Topic/principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programs
The Company has not conducted awareness programmes for its value chain partners in the current financial year.		

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.**

   The Company has established a Code of Conduct for Directors and Senior Management Personnel to prevent and address any conflict of interest among the Board members. The Code serves as a

guide for identifying and addressing ethical dilemmas, fostering a culture of honesty and accountability. The Code of Conduct can be accessed at:
https://sanmitinfraltd.com/wp-content/uploads/2023/08/9.-CODE-OF-CONDUCT-FOR-BOARD-AND-SENIOR-MANAGEMENT-PERSONNEL.pdf

PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe

Essential Indicators

1. **Percentage of R&D and capital expenditure (capex) investments in specific technologiesto improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.**

	2024-25	2023-24	Details of Improvements in environmental and social impacts
R&D	The Company has not made R&D or capex investments focused on improving environmental and social impacts.		
Capex			

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

   The Company does not currently maintain a formal sustainable sourcing procedure; however, it recognises its significance and remains open to considering the development of such a policy in the future.

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

   Not Applicable

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.**

   The Company currently has not established any specific processes for the safe reclamation of products for end-of-life reuse, recycling, or disposal, encompassing materials such as plastics, e-waste, hazardous waste, and other forms of waste.

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.**

   No, Extended Producer Responsibility is not applicable to the Company.

Leadership Indicators

1. **Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?**

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 web-link.
The Company is currently not performing Life Cycle Assessment for its services.					

2. **If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.**

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

3. **Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).**

Indicate input material	Recycled or re-used input material to total material	
	FY 2024-25	FY 2023-24
	Nil	Nil

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

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

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 percentage of products sold) for each product category
Not Applicable	

PRINCIPLE 3: Businesses should respect and promote the well-beingof all employees, including those in their value chains

Essential Indicators

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

	% of employees covered by										
	Total (A)	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)
Permanent Employees											
Male	27	00	0.00	00	0.00	00	0.00	00	0.00	00	0.00
Female	11	00	0.00	00	0.00	11	100.00	00	0.00	00	0.00
Total	38	00	0.00	00	0.00	11	100.00	00	0.00	00	0.00
Other than Permanent Employees											
Male	00	00	0.00	00	0.00	00	0.00	00	0.00	00	0.00
Female	00	00	0.00	00	0.00	00	0.00	00	0.00	00	0.00
Total	00	00	0.00	00	0.00	00	0.00	00	0.00	00	0.00

Note- Percentage of (D) – maternity is calculated as 100% considering (A) as total employees for the purpose of the said benefit, as per FAQs on BRSR issued by NSE

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

	% of workers covered by										
	Total (A)	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)
Permanent workers											
Male	00	00	0.00	00	0.00	00	0.00	00	0.00	00	0.00
Female	00	00	0.00	00	0.00	00	0.00	00	0.00	00	0.00
Total	00	00	0.00	00	0.00	00	0.00	00	0.00	00	0.00
Other than Permanent workers											
Male	12	00	0.00	00	0.00	00	0.00	00	0.00	00	0.00

Female	00	00	0.00	00	0.00	00	0.00	00	0.00	00	0.00
Total	12	00	0.00	00	0.00	00	0.00	00	0.00	00	0.00

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:[5]

	FY 2024-25	FY 2023-24
Cost incurred on well-being measures as a % of total revenue of the company	0.00	0.00

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

Benefits	FY 2024-25			FY 2023-24		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	28.00	100.00	Yes	26.00	100.00	Yes
Gratuity	100.00	0.00	N.A.	100.00	0.00	N.A.
ESI	24.00	100.00	Yes	23.00	100.00	Yes

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, the premises of the Company are accessible to the differently abled employees and workers as the Company is committed to providing an accessible environment for employees and workers with disabilities. The infrastructure includes features like wheelchair-friendly ramps and lifts to

[5] The above calculations are in accordance with Part B, Attribute 5 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

ensure ease of access and to support an inclusive work environment. Although currently there are no employees or workers with disabilities, the Company proactively maintains this inclusive infrastructure to support and accommodate any future hires.

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

   The Company does not have an equal opportunity policy in place, however, it recognises its importance and is open to exploring the development of such a policy in the future.

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

	Permanent Employees		Permanent workers	
Gender	**Return to work rate**	**Retention rate**	**Return to work rate**	**Retention rate**
Male	00	00	00	00
Female	00	00	00	00
Total	00	00	00	00

Note: No maternity leaves were availed in FY 23-24 and FY 24-25.

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes, an informal mechanism is being utilised within the factory to receive and address grievances of the aggrieved workers.
Other than Permanent Workers	
Permanent Employees	Yes, the employees can raise their concerns or grievance through multiple channels. They can use the designated email addresses: sanmitinfra@gmail.com and md@sanmitinfraltd.com. Further, employees can directly escalate their grievances to the Directors and senior management. Furthermore a whistle blower policy is also
Other than Permanent Employees	

	implemented which enables the employees to report cases of misconduct through a secure channel.

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

Category	FY 2024-25			FY 2023-24		
	Total employees / workers in respective category (A)	No. of employees/ workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	38	00	0.00	35	00	0.00
Male	27	00	0.00	23	00	0.00
Female	11	00	0.00	12	00	0.00
Total Permanent Worker	00	00	0.00	00	00	0.00
Male	00	00	0.00	00	00	0.00
Female	00	00	0.00	00	00	0.00

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

	FY 2024-25					FY 2023-24				
	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)
Employees										
Male	27	27	100.00	27	100.00	29	00	0.00	29	100.00

Female	11	11	100.00	11	100.00	16	00	0.00	16	100.00
Total	38	38	100.00	38	100.00	45	00	0.00	45	100.00
Workers										
Male	12	12	100.00	12	100.00	08	08	100.00	08	100.00
Female	00	00	0.00	00	0.00	00	00	0.00	00	0.00
Total	12	12	100.00	12	100.00	08	08	100.00	08	100.00

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	27	27	100.00	29	29	100.00
Female	11	11	100.00	16	16	100.00
Total	38	38	100.00	45	45	100.00
Workers						
Male	12	12	100.00	08	00	0.00
Female	00	00	0.00	00	00	0.00
Total	12	12	100.00	08	00	0.00

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, the coverage such system?**

Yes. The Company has implemented an Occupational Health and Safety Management System certified under ISO 45001:2018 at its Rasayani manufacturing unit.

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 conducts regular workplace inspections, trainings and risk assessments under its ISO 45001:2018 framework. Hazard identification is carried out for both routine operations and non-routine tasks, supported by periodic reviews and corrective action planning.

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

Yes. Workers can raise safety concerns directly with their supervisors, and they are empowered to withdraw from any unsafe situation in line with the Company's safety protocols.

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

The workforce doesn't currently have access to non-occupational medical and healthcare services. However, the company recognizes the significance of the same and will strive to extend these services to its workforce in the future.

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

Safety Incident/Number	Category	FY 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	**Employees**	0.00	0.00
	Workers	0.00	0.00
Total recordable work-related injuries	**Employees**	00	00
	Workers	00	00
No. of fatalities	**Employees**	00	00
	Workers	00	00
High consequence work-related injury or ill-health (excluding fatalities)	**Employees**	00	00
	Workers	00	00

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

The Company is dedicated to ensuring a healthy and safe work environment for its employees and workers. It achieves this through, regular training sessions, and ongoing risk assessments, ensuring a hazard-free environment and compliance with all relevant health and safety regulations. The Company has implemented an Occupational Health and Safety Management System certified under ISO 45001:2018 at its Rasayani manufacturing unit.

The Company provides factory workers with essential personal protective equipment, including safety shoes, helmets, and reflector jackets. Additionally, clear Do's and Don'ts instructions are prominently displayed at key locations within the factory to promote safety awareness. Firefighting arrangements have also been established throughout the factory premises to address emergencies promptly.

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

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

14. **Assessments for the year:**

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

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

Not Applicable, as no assessments of health and safety practices and working conditions were conducted in the financial year.

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).**

   No, currently the Company doesn't offer a specific life insurance or compensatory package. However, the company recognizes the significance of the same and will strive to extend such benefits in the future.

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

   The Company verifies the PAN and GST filing status of the vendors to ensure that statutory dues have been properly deducted and deposited by the value chain partners.

3. **Provide the number of employees / workers having suffered high consequence work-related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:**

	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25	FY 2023-24	FY 2024-25	FY 2023-24
Employees	00	Nil	00	Nil
Workers	00	Nil	00	Nil

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

   Currently, transition assistance programs designed to facilitate continued employability or support career transitions following retirement or termination are not being offered.

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

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

6. **Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.**

   Not Applicable

PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders

Essential Indicators

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

   The Company engages with stakeholders through a structured process that begins by mapping both internal and external groups. Their influence on our operations, as well as the impact of our activities on them, is carefully assessed. This evaluation helps us prioritize stakeholders and gain clarity on their expectations and concerns. Continuous interaction through multiple channels has not only strengthened our relationships but also provided valuable insights that support the refinement of our business strategy.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized 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
Customers	No	Email, SMS, Newspaper, website, social media, Physical meet	Regular	Awareness campaigns, query resolution
Employees & Workers	No	Email, CEO communication meet, Physical meet	Regular	Employee engagement
Shareholders	No	Various modes including e-mail, newspapers, Company website, Physical meet	Frequently and need basis	Keeping shareholders updated of all developments in the Company
Communities	Yes	Email, Newspaper, website	As and when required	Requisite engagement under CSR objectives
Value Chain Partners	No	Email, calls, physical meeting	As and when required	Strengthen the relationship with vendors in order to deliver better quality to the end customer

Regulatory Authorities	No	Through returns, filings, submissions, etc., email	As and when required	Submissions of compliances and receipt of approvals, replies to queries

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.**

   Sanmit Infra Limited has entrusted its Managing Director with the responsibility of facilitating consultations between stakeholders and the Board on economic, environmental, and social matters. The Managing Director, together with the senior leadership team, provides regular updates to the Board and its Committees, both during Board meetings and in dedicated Committee sessions. To support this, the Company has established processes that enable management to capture feedback from key stakeholders and present it for discussion at the Board and Committee level.

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. Sanmit Infra Limited relies on the outcomes of stakeholder consultations to identify and manage environmental and social topics. While no specific instances arose during the reporting period, the Company maintains an open and proactive approach to engagement. Inputs received from stakeholders are duly considered, and wherever relevant, they are integrated into decision-making processes.

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

   Through its CSR efforts, the Company remains committed to addressing the needs of disadvantaged and marginalized groups. During the reporting year, no direct concerns or engagements from such stakeholders were noted. Nevertheless, the Company continued to implement programs that are designed to create meaningful benefits for vulnerable

communities.

PRINCIPLE 5: Businesses should respect and promote human rights

Essentials Indicators

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	38	38	100.00	35	35	100.00
Other than permanent	00	00	0.00	10	10	100.00
Total Employees	38	38	100.00	45	45	100.00
Workers						
Permanent	00	00	0.00	00	00	0.00
Other than permanent	12	12	100.00	08	08	100.00
Total Workers	12	12	100.00	08	08	100.00

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

Category	FY 2024-25					2022-23				
	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)
Employees										

Permanent	38	00	0.00	38	100.00	35	00	0.00	35	100.00
Male	27	00	0.00	27	100.00	23	00	0.00	23	100.00
Female	11	00	0.00	11	100.00	12	00	0.00	12	100.00
Other than Permanent	00	00	0.00	00	0.00	10	00	0.00	10	100.00
Male	00	00	0.00	00	0.00	06	00	0.00	06	100.00
Female	00	00	0.00	00	0.00	04	00	0.00	04	100.00
Workers										
Permanent	00	00	0.00	00	0.00	00	00	0.00	00	0.00
Male	00	00	0.00	00	0.00	00	00	0.00	00	0.00
Female	00	00	0.00	00	0.00	00	00	0.00	00	0.00
Other than Permanent	12	00	0.00	12	100.00	08	00	0.00	08	100.00
Male	12	00	0.00	12	100.00	08	00	0.00	08	100.00
Female	00	00	0.00	00	0.00	00	00	0.00	00	0.00

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)*	07	10,49,054	01	20,000
Key Managerial Personnel	01	10,49,054	01	4,20,000
Employees other than BoD and KMP	26	2,55,469	10	3,11,624
Workers	12	1,70,352	00	00

* Remuneration of BOD also includes sitting fees being paid to non-executive directors.

b. **Gross wages paid to females as % of total wages paid by the entity, in the following format:**[6]

	FY 2024-25	FY 2023-24
Gross wages paid to females as % of total wages	23.24	23.21

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)**

   The Company has designated the Board of Directors to oversee human rights aspect within the organisation, with the HR Head also responsible for its management.

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

   Individuals can raise concerns by writing to sanmitinfra@gmail.com or md@sanmitinfraltd.com. Employees are also encouraged to bring their grievances directly to the Directors or senior management, ensuring that their issues are addressed through proper and accessible communication channels. Additionally, the Company has also implemented a Whistle-blower Policy designed to enable employees to report any misconduct or unethical behaviour.

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

	FY 2024-25			FY 2023-24		
	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	Nil	Nil	NA	Nil	Nil	NA
Discrimination at workplace	Nil	Nil	NA	Nil	Nil	NA
Child Labour	Nil	Nil	NA	Nil	Nil	NA

[6] The above calculations are in accordance with Part B, Attribute 6 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

Forced Labour/ Involuntary Labour	Nil	Nil	NA	Nil	Nil	NA
Wages	Nil	Nil	NA	Nil	Nil	NA
Other - Human Rights related issues	Nil	Nil	NA	Nil	Nil	NA

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

	FY 2024-25	FY 2023-24
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	00	00
Complaints on POSH as a % of female employees / workers	0.00	0.00
Complaints on POSH upheld	00	00

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

   The Company has implemented a Whistle-blower Policy designed to enable employees to report any concerns or suspected violations directly to the Audit Committee without any adverse consequences. Employees can confidentially raise issues related to misconduct or unethical behavior with the Audit Committee and the Directors. Upon receiving a report, the Audit Committee and Directors promptly begin an investigation to gather all necessary facts and evidence. If the allegations are substantiated, suitable disciplinary measures are taken against the responsible individual.

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

   No, human rights requirements are not currently included as part of the Company's business agreements and contracts.

[7] The above calculations are in accordance with Part B, Attribute 6 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

10. **Assessments for the year:**

	% of your plants and Offices that were assessed (by entity or statutory authorities or third parties)
Child Labour	Nil. No assessments were conducted during the reporting year.
Forced/involuntary labour	
Sexual Harassment	
Discrimination at workplace	
Wages	
Others- please specify	

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

    Not Applicable

Leadership Indicators

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

   During the financial year, the Company did not receive any Human Rights grievances requiring the modification/introduction of any business process.

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

   No human rights due diligence was conducted during the financial year.

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?**

   The Company is committed to providing a barrier-free environment for differently-abled visitors. Its premises are designed to be accessible, featuring facilities such as wheelchair-friendly ramps and lifts, thereby promoting inclusivity and ease of access for all.

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

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

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

   Not Applicable

PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment

Essential Indicators

1. **Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**[8]

Parameter	FY 2024-25 (In Gigajoules)	FY 2023-24 (In Gigajoules)
From renewable sources		
Total electricity consumption (A)	0.00	0.00
Total fuel consumption (B)	0.00	0.00
Energy consumption through other sources (C)	0.00	0.00
Total Energy consumption from renewable sources (A+B+C)	0.00	0.00
From non-renewable sources		
Total electricity consumption (D)*	576.27	210.04
Total fuel consumption (E) **	11534.51	8052.44
Energy consumption through other sources (F)	0.00	0.00
Total Energy consumption from non-renewable sources (D+E+F)	12110.78	8262.48
Total energy consumed (A+B+C+D+E+F)	12110.78	8262.48
Energy intensity per rupee of turnover *(Total energy consumption/ Revenue from Operations) -GJ/Rs*	0.0000085	0.0000088
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity	0.00018	0.00020

[8] The above calculations are in accordance with Part B, Attribute 3 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

(PPP)[9] **(*Total energy consumed / Revenue from operations adjusted for PPP*) -*GJ/USD***		
Energy intensity in terms of physical output[10]**- GJ/Metric tonne**	2.14	3.44
Energy intensity *(optional)* – GJ/Workforce	242.22	155.90

*****For purchased electricity, data from the Corporate Office (CO) has not been included since it is a leased property and electricity bills are not available. Accordingly, only the Plant's electricity consumption has been considered for FY 2023–24 and FY 2024–25. It may be noted that the Plant was operational for only 6-7 months during FY 2023–24, while it was fully functional in FY 2024–25, which explains the increase in electricity consumption.

** For FY 2024–25, diesel consumption from DG sets, forklifts, and fire pumps has been accounted for, in addition to two newly added company-owned vehicles (excluding forklifts and fire pumps). By contrast, in FY 2023–24, only furnace oil and a limited number of company-owned vehicles were considered. This expansion in scope and operational additions has resulted in an overall increase in total fuel consumption.

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

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? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any**

   Not Applicable as the Company does not come under PAT Scheme.

3. **Provide details of the following disclosures related to water, in the following format:**[11]

[9] The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

[10] The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

[11] The above calculations are in accordance with Part B, Attribute 2 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII,

Parameter	FY 2024-25	FY 2023-24
Water withdrawal by source (in kilolitres)		
(i) Surface water	0.00	0.00
(ii) Groundwater	2,303.76	647.64
(iii) Third party water	214.50	214.44
(iv) Seawater / desalinated water	0.00	0.00
(v) Others	0.00	0.00
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	2,518.26	862.08
Total volume of water consumption (*in kilolitres*) ^	42.90	42.89
Water intensity per rupee of turnover ***(Water consumed / Revenue from operations)*** - Kilolitres/Rs	0.000000030	0.000000046
Water Intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)[12] ***(Total water consumption / Revenue from operations adjusted for PPP) - Kilolitres/USD***	0.00000062	0.0000010
Water intensity in terms of physical output[13]- Kilolitres /Metric tonne	0.0076	0.018
Water intensity ***(optional)*** **– Kilolitres/Workforce**	0.86	0.81

*Note: Water withdrawal has increased in FY 2024–25 as compared to FY 2023–24. This variation is primarily because the Plant was not fully operational during FY 2023–24 (as mentioned in the note

and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

[12] The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

[13] The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

under Essential Indicator Question 1), whereas in the reporting period of FY 2024–25, the plant was fully functional**.**

^Water consumption is assumed to be 20% of the water withdrawal from third party sources (Corporate Office), in accordance with the Manual on Sewage and Sewerage Treatment (2nd Edition), Central Public Health and Environmental Engineering Organisation.

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

4. Provide the following details related to water discharged

Parameter	FY 2024-25	FY 2023-24
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	0.00	0.00
- **No treatment**		
- **With treatment – please specify level of treatment**		
(ii) To Groundwater	0.00	0.00
- **No treatment**		
- **With treatment – please specify level of treatment**		
(iii) To Seawater	0.00	0.00
- **No treatment**		
- **With treatment – please specify level of treatment**		
(iv) Sent to third-parties		
- **No treatment**	171.60	171.55
- **With treatment – please specify level of treatment**	0.00	0.00
(v) Others -	0.00	0.00
- **No treatment**		
- **With treatment – please specify level of treatment**		
Total water discharged (in kilolitres) ^	171.60	171.55

^Water discharge is assumed to be 80% of the water withdrawal from third party sources (Corporate Office), in accordance with the Manual on Sewage and Sewerage Treatment (2nd Edition), Central Public Health and Environmental Engineering Organisation

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

5. **Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.**
   The Company currently does not have any mechanisms or systems in place for achieving Zero Liquid Discharge (ZLD).

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

Parameter	Please specify unit	FY 2024-25	FY 2023-24
NOx	At present, the Company has not instituted monitoring mechanisms for air emissions as specified by regulatory standards.		
SOx			
Particulate matter (PM)			
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)			
Others – please specify			

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

7. **Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:**[14]

Parameter	Unit	FY 2024-25	FY 2023-24

[14] The above calculations are in accordance with Part B, Attribute 1 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 1 emissions **(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) ***	Metric tonnes of CO2 equivalent	704.57	455.95
Total Scope 2 emissions[15] **(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)****	Metric tonnes of CO2 equivalent	116.37	41.78
Total Scope 1 and Scope 2 emissions per rupee of turnover **(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)**	Metric tonnes of CO2 equivalent/ Rupees	0.00000057	0.00000053
Total Scope 1 and Scope 2 emissions per rupee of turnover adjusted for Purchasing Power Parity (PPP)[16] **(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)**	Metric tonnes of CO2 equivalent/ USD	0.000012	0.000012
Total Scope 1 and Scope 2 emissions intensity in terms of physical output[17]	Metric tonnes of CO2 equivalent/ Metric tonnes	0.14	0.21
Total Scope 1 and Scope 2 emission intensity ***(optional)*** **– the relevant metric may be selected by the entity**	Metric tonnes of CO2 equivalent/ Workforce	16.42	9.39

[15] The above calculations as per the updated emission factors provided in the CO_2 Baseline Database for the Indian Power Sector – User Guide, Version 20.0, December 2024, published by the Central Electricity Authority, Ministry of Power, Government of India.

[16] The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

[17] [17] The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

*Scope 1 emissions are calculated based on the fuel consumed in operations and company-owned vehicles. The observed increase is attributable to higher fuel consumption during the reporting period. *(Please refer to the comment/note added in Essential indicator Question 1).*

**Scope 2 emissions are calculated based on the electricity consumed in operations. The observed increase is attributable to higher electricity consumption during the reporting period. *(Please refer to the comment/note added in Essential indicator Question 1).*

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

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

   During the reporting year, the Company did not undertake any specific projects aimed at reducing GHG emissions. Nevertheless, we remain committed to exploring and implementing innovative strategies to achieve this objective in the future.

9. **Provide details related to waste management by the entity, in the following format:**[18]

Parameter	FY 2024-25	FY 2023-24
Total Waste generated (in metric tonnes)		
Plastic waste *(A)*	0.00	0.00
E-waste *(B)*	0.00	0.00
Bio-medical waste *(C)*	0.00	0.00
Construction and demolition waste *(D)*	0.00	0.00
Battery waste *(E)*	0.00	0.00
Radioactive waste *(F)*	0.00	0.00
Other Hazardous waste. *(G)* **– Drums containing bitumen**	21.01	37.57
Other Non-hazardous waste generated *(H)***.- Kitchen waste**	1.70	1.50

[18] The above calculations are in accordance with Part B, Attribute 4 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

Parameter	FY 2024-25	FY 2023-24
*Total (**A+B + C + D + E + F + G + H**)*	22.71	39.07
Waste intensity per rupee of turnover **(Total waste generated / Revenue from operations) - Metric tonne/Rs**	0.00000002	0.00000004
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)[19] **(Total waste generated / Revenue from operations adjusted for PPP) - Metric tonne/USD**	0.00000033	0.00000093
Waste intensity in terms of physical output-[20]	0.004	0.016
Waste intensity (optional) – MT/Workforce	0.45	0.74
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste- Hazardous waste		
(i) Recycled	0.00	0.00
(ii) Re-used - Drums containing bitumen	0.00	0.31
(iii) Other recovery operations	0.00	0.00
Total	0.00	0.31
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste - Hazardous waste and Non- Hazardous Waste		
(i) Incineration -	0.00	0.00
(ii) Landfilling – Kitchen waste	1.70	1.50
(iii) Other disposal operations- Re-conditioning of Drums and sold to Authorised Vendors	21.01	37.26
Total	22.71	38.76

[19] The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

[20] The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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

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

    The Company procures bitumen in drums from the importer and transports it from the port to the Rasayani plant. At the plant, the bitumen is melted using a decanting machine and subsequently stored in vertical tanks. Once the melting process is complete, the empty drums are placed in a designated open area outside the plant premises. These drums are then collected by our authorized vendor, M/s Global Trading Company, who reconditions them and sells them to their customers.

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	Types 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.
The Company does not have any operations in ecologically sensitive regions.			

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

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

The Company did not conduct any environmental impact assessment (EIA) for any of its projects in the current reporting period.

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

Serial Number	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 taken, if any action
There were no material non-compliances reported by the Company in Financial Year 2024-25.				

Leadership Indicators

1. **Water withdrawal, consumption and discharge in areas of water stress (in kilolitres): NA**
   For each facility / plant located in areas of water stress, provide the following information:
   (i) **Name of the area-**
   (ii) **Nature of operations-**
   (iii) **Water withdrawal, consumption and discharge in the following format:**

Parameter	FY 2024-25	FY 2023-24
Water withdrawal by source (in kilolitres)		
(i) Surface water	Not Applicable, as the Company does not have any operations in areas of water stress.	
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		
Total volume of water withdrawal		

Parameter	FY 2024-25	FY 2023-24
(in kilolitres)		
Total volume of water consumption (in kilolitres)		
Water intensity per rupee of turnover ***(Water consumed / turnover)***		
Water intensity ***(optional)*** **– the relevant metric may be selected by the entity**		
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	Not Applicable, as the Company does not have any operations in areas of water stress.	
- No treatment		
- With treatment – please specify level of treatment		
(ii) Into Groundwater		
- No treatment		
- With treatment – please specify level of treatment		
(iii) Into Seawater		
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment – please specify level of treatment		
(v) Others		
- No treatment		
- With treatment – please specify level of treatment		
Total water discharged (in kilolitres)		

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

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

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 3 emissions* **(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)**	Metric tonnes of CO2 equivalent	1.19	1.05
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO2 equivalent/ Rupees	0.00000000083	0.00000000111
Total Scope 3 emissions per Workforce	Metric tonnes of CO2 equivalent/ Workforce	0.024	0.020

***** Scope 3 emissions for both FY 23-24 and FY 24-25, has been calculated based on the Waste generation, disposal and reclamation data.

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

3. **With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.**
   Not Applicable

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:**

Sr. No.	Initiative undertaken	Details of the initiative *(Web-link, if any, may be provided along-with summary)*	Outcome of the initiative
The Company has not yet implemented specific initiatives or innovative technologies targeted at enhancing resource efficiency or reducing the impact of emissions, effluent discharge, or waste generation.			

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

   The Company currently does not have a business continuity and disaster management plan in place.

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?**

   Not applicable, as the value chain partners are not being assessed.

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

   Nil

8. **How many Green Credits have been generated or procured:**[21]

   a. By the listed entity - Nil

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

PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

Essential Indicators

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

   The Company is not affiliated with any trade or industry chambers/ associations.

[21] The above disclosure is made as per the SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dt. 28th March 2025.

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

S. No	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
Not Applicable		

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

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

Leadership Indicators

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

Sr. No	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, If available
The Company did not engage in any public policy advocacy during the reporting year.					

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

Essential Indicators

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

Name and Brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web Link
Not Applicable					

2. **Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&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. pf Project Affected Families (PAFs)	5 of PAFs covered by R&R	Amounts paid to PAFs in the FY (in INR)
Not Applicable						

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

   Aggrieved community members can raise their concerns by writing to INFO@sanmit.com, and the Company takes adequate steps in a timely manner to resolve the grievance.

4. **Percentage of input material (inputs to total inputs by value) sourced from suppliers:**[22]

	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/ small producers	28.57	22.81

[22] The above calculations are in accordance with Part B, Attribute 7 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

Directly from within India	100.00	100.00

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[23]**

Location	FY 2024-25	FY 2023-24
Rural	0.00	0.00
Semi-Urban	0.00	0.00
Urban	13.03	10.56
Metropolitan	86.97	89.44

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
Not Applicable	

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 INR)
No CSR projects are being currently undertaken in the designated aspirational districts.			

[23] The above calculations are in accordance with Part B, Attribute 7 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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

The Company currently does not have a preferential procurement policy.

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

Not Applicable

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

Not Applicable

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
Not Applicable since no benefits have been derived from the intellectual properties based on traditional knowledge.				

5. **Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.**

Name of authority	Brief of the case	Corrective Action taken
Not Applicable as there has not been any adverse order in intellectual property related dispute wherein usage of traditional knowledge is involved.		

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

S. No	CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups

1.	Anvi Medical and Educational Foundation: This trust is engaged in human health activities.	Cannot be ascertained	100.00

PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner

Essential Indicators

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

   Consumers can submit their feedback and complaints to the company's official email ID at sanmitinfra@gmail.com or by calling at the following telephone numbers: 022-67429100 and

9223400434. All complaints and feedback once received, are carefully reviewed by the Compliance Officer, who ensures that grievances are addressed in timely manner and appropriate actions to resolve any concerns.

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

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

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

	FY 2024-25		Remarks	FY 2023-24		Remarks
	Received during the Year	Pending resolution at end of year		Received during the Year	Pending resolution at end of year	
Data Privacy	00	00	NA	00	00	NA
Advertising	00	00	NA	00	00	NA
Cyber-security	00	00	NA	00	00	NA
Delivery of essential services	00	00	NA	00	00	NA
Restrictive Trade Practices	00	00	NA	00	00	NA
Unfair Trade Practices	00	00	NA	00	00	NA
Other	00	00	NA	00	00	NA

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

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

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

   The Company has implemented a Cyber Security and Data Privacy Policy to enhance its preparedness against cyber threats and to minimize exposure to related risks, thereby safeguarding its assets. The Policy requires compliance with both national and international cyber security standards to ensure the highest level of protection. Further critical data is stored on secured servers to prevent unauthorised access, use, disclosure, modification and disposal. This policy ensures the confidentiality and integrity of information related to employees, customers, third parties, and suppliers, which is systematically organized in protected folders.

   Web-link: https://sanmitinfraltd.com/wp-content/uploads/2023/08/12.-DATA-PRIVACY.pdf

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

   Not Applicable

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

   a. **Number of instances of data breaches:**

      Nil, there have not been any such instances during the reporting period.

   b. **Percentage of data breaches involving personally identifiable information of customers:** [24]

      Not applicable

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

[24] The above calculations are in accordance with Part B, Attribute 8 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

Not Applicable

Leadership Indicators

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

   Comprehensive details and information about the products and services offered by the company are available on the official website at www.sanmitinfraltd.com**.**

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

   The company informs and educates consumers on the safe and responsible use of products by providing safety details with the products.

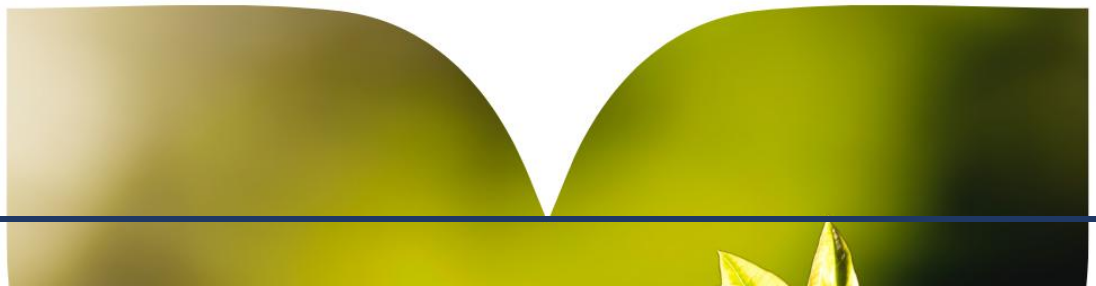
3. **Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.**

   The company currently does not have a process in place to inform consumers of any risk of disruption or discontinuation 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/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

   The product information is displayed in compliance with local laws and further details are available on the company's website. No consumer satisfaction survey is being conducted.

OUR APPROACH TO SUSTAINABLE DEVELOPMENT



Small Steps, Lasting Impact

Sanmit Infra is committed to driving sustainable development by integrating social, environmental, and governance priorities into its operations. The company emphasizes health, education, workplace safety, responsible production, and strong institutional practices, ensuring that its initiatives create lasting positive impact for employees, local communities, and the broader environment. Through targeted programs, innovative processes, and adherence to international standards, Sanmit Infra aligns its business activities with the Sustainable Development Goals, fostering inclusive growth and long-term resilience.

SDG 3: Good Health and Well-Being



Sanmit Infra considers health and well-being vital for thriving communities. Through the Anvi Medical and Educational Foundation, the company supported programs that directly improved access to healthcare and preventive interventions for local populations, ensuring that vulnerable groups received essential services to enhance their quality of life.



SDG 9: Industry, Innovation, and Infrastructure

Sanmit Infra emphasizes innovation and industrial excellence in its operations. Adherence to ISO 9001 and ISO/IEC 17025 standards reflects the company's dedication to high-quality manufacturing and technical competence. These practices not only ensure reliable outputs but also strengthen sustainable industrial growth and foster confidence among clients and stakeholders.



SDG 12: Responsible Consumption and Production

Sustainability is embedded in Sanmit Infra's operations, especially in managing bitumen drums. Drums are melted, stored in vertical tanks, and responsibly collected, reconditioned, and resold, creating a circular approach to waste. This focus on recycling and reuse reduces environmental impact while demonstrating a commitment to responsible production and sustainable resource management.

SDG 16: Peace, Justice, and Strong Institutions