



SunTec™



SunTec ESG Report

April 1, 2024, to March 31, 2026

Disclaimer

This ESG Report has been prepared by SunTec Business Solutions to provide stakeholders with a transparent overview of the Company's environmental, social, governance, ethics, sustainable procurement, and product responsibility practices, performance, and commitments for the reporting period. The information presented in this report is based on data, records, estimates, assumptions, and management representations available at the time of publication and has been compiled in good faith using internally established processes and reporting methodologies. The report is intended for informational purposes only and should not be construed as a guarantee of future performance, a legal commitment, or an assurance of the achievement of stated goals, targets, or aspirations. Certain statements contained herein may be forward-looking in nature and are subject to risks, uncertainties, regulatory developments, stakeholder expectations, technological changes, and other factors that may cause actual outcomes to differ materially from those expressed or implied. Unless otherwise stated, the information in this report has not been independently assured by a third party. SunTec reserves the right to update, amend, or restate information as methodologies, data quality, reporting standards, or business circumstances evolve. This report should be read in conjunction with SunTec's applicable policies, governance framework, and reporting scope as described within the report.



Foreword



The state-of-the-art **IGBC Platinum-certified SunTec Campus**, home to our 500+ SunTeciens, set amid around 15,000+ trees and plants planted by SunTec employees, their families, and their customers, constructed keeping in mind the flora and fauna of the region

At SunTec, we believe that sustainable growth is not a parallel agenda—it is the foundation of long-term value creation. As we navigate an increasingly complex global landscape, our commitment to Environmental, Social, and Governance (ESG) principles continues to shape how we operate, innovate, and engage with our stakeholders.

This is our second ESG Report, building on the foundation established in our inaugural publication, where we articulated our commitment to responsible and sustainable growth. This report reflects our continued journey to embed responsibility into every aspect of our business. Over the past two years, we have strengthened our governance frameworks, expanded and formalized our policy landscape, and enhanced our ability to measure, monitor, and manage ESG performance across key areas such as climate action, employee well-being, ethical conduct, and sustainable supply chains. Our approach is guided by globally recognized standards, including GRI, SASB, and EcoVadis, ensuring a high degree of transparency, comparability, and accountability in our disclosures.



We recognize that progress in ESG is not defined by ambition alone, but by measurable outcomes. Accordingly, we have deepened our focus on data-driven decision-making, supported by a comprehensive metrics framework that enables us to track our impact, identify gaps, and continuously improve.

At the heart of our ESG strategy lies a simple principle: doing the right thing—for our people, our clients, our communities, and the planet. From advancing diversity and inclusion, to strengthening human rights practices, to driving responsible innovation in our products, we are committed to building a business that is not only resilient but also responsible. As we look ahead, our priorities remain clear.

We will continue to align with global commitments such as the Paris Agreement and our Net Zero aspirations, deepen stakeholder engagement, and enhance the integration of ESG into our core business strategy. Our goal is not just to meet expectations, but to lead with purpose and set new benchmarks in sustainable business practices.

This report is both a reflection of our progress and a reaffirmation of our commitment to continuous improvement. We invite our stakeholders to engage with us, challenge us, and partner with us as we move forward on this journey.

We, the people of SunTec





Contents

- Disclaimer 1
- Foreword 3
- Executive Summary..... 10
- 1. About this report 12
- 2. Integrating Business Excellence with Conscious Value Creation 15
 - 2.1 Our ESG pillars 16
 - 2.2 From Commitment to Measurable Impact..... 18
- 3. Message from our leadership 19
 - 3.1 Message from the CEO and Founder 19
 - 3.2 Message from the Board of Directors 20
 - 3.3 Message from the ESG Committee 21
- 4. Highlights during this period 24
 - 4.1 Building a Responsible, Ethical and Resilient Organization 24
 - 4.2 Environmental Highlights 25
 - 4.3 Community and Social Impact Highlights 26
 - 4.4 Governance and Ethics Related Highlights 27
 - 4.5 Sustainable Procurement Highlights 27
 - 4.6 Global Commitments and Certifications 29
 - 4.7 Performance Snapshot..... 31
 - 4.8 Key Metrics 33
- 5. About SunTec 35
 - 5.1 Company Overview 35
 - 5.2 Global Presence 35
 - 5.3 Business Model and Value Proposition..... 36
 - 5.4 Our Solutions and Products..... 37
 - 5.5 Other key information..... 37
- 6. Our Strategic ESG Outlook and Update on our progress 38
 - 6.1 Evolving ESG from Responsibility to Strategic Advantage 38
 - 6.2 Our ESG Goals and Where we stand 38
 - 6.3 Progress against Material Topics 39
 - 6.4 External Sustainability Commitments 48





6.5 Our immediate ESG priorities	49
7. A Quick snapshot of progress since our last report.....	56
8. SNEHA – Nurturing Community Engagement and Social Impact	57
8.1 About SNEHA.....	57
8.2 Education and Child Development	57
8.3 Health and Wellbeing.....	59
8.4 Community Care and Social Inclusion	60
8.5 Environmental Stewardship.....	62
8.6 Inclusion, Social Equity and Community Development.....	63
8.7 Strengthening CSR Governance and Impact Measurement	64
8.8 Long-Term SNEHA Outlook.....	64
9. Our Approach to Materiality	65
9.1 Defining Materiality at SunTec	65
9.2 Materiality Assessment Framework	65
10. Corporate Governance	69
10.1 Governance Philosophy.....	69
10.2 Governance Structure and Board Oversight.....	70
10.3 ESG Governance Framework	71
10.4 Ethics, Integrity and Responsible Conduct	72
10.5 Whistleblower and Speak-Up Culture	72
10.6 Risk Management and Business Continuity	73
10.7 Data Privacy, Cybersecurity and Digital Trust.....	74
10.8 Policy Framework.....	75
10.9 Responsible AI Governance.....	77
10.10 Governance Performance Snapshot.....	78
10.11 Risk management	78
10.12 Prohibition of child labour.....	80
10.13 Compliance with laws and regulations	81
11. Environment – In detail	82
11.1 Our Environmental Commitment.....	82
11.2 Our performance on environmental factors.....	83
11.3 Environmental Governance	83





11.4 Sustainable Infrastructure and Green Campus.....	84
11.5 Energy Management.....	84
11.6 Climate Change and Emissions Management.....	85
11.7 Water Stewardship.....	86
11.8 Waste Management and Circularity	86
11.9 Biodiversity and Greenspaces	87
11.10 Building Environmental Awareness	88
11.11 Progress Against Our Environmental Commitments	88
11.12 Our Policy Framework that focuses on the environment.....	90
11.13 Risk Management and Compliance.....	91
11.14 Climate Strategy and Net Zero Pathway.....	92
11.15 Green Infrastructure and Digital Sustainability.....	93
11.16 Environmental Awareness and Employee Participation	96
11.17 Future Outlook.....	96
12. Labor and Human Rights – In detail	98
12.1 Our Commitment to People.....	98
12.2 Performance Indicators	98
12.3 Diversity, Equity and Inclusion at SunTec	99
12.4 Our commitment to Human Rights	99
12.5 Employee Well-being and Support	100
12.6 Responsible Supply Chain and Human Rights Due Diligence	103
12.7 Governance and Policy Framework	103
12.8 Learning, Awareness and Capability Building	104
12.9 Human Rights and Ethical Labor Practices	105
12.10 Employee Engagement and Community Participation.....	106
12.11 Grievance Mechanisms and Ethical Conduct	107
12.12 Compensation Commitment	108
12.13 Outlook and Continuous Improvement	108
12.13 Future Outlook.....	109
13. Ethics, Compliance and Responsible Business Conduct – In detail	111
13.1 Our Commitment to Ethical Business Conduct	111
13.2 Ethics and Compliance Performance Snapshot.....	112





- 13.3 Governance and Oversight 113
- 13.4 Ethics and Compliance Governance Model 113
- 13.5 Policy Framework..... 114
- 13.6 Supporting Governance and Security Frameworks..... 115
- 13.7 Anti-Corruption and Ethical Practices 116
- 13.8 Awareness and Capacity Building 116
- 13.9 Speak-Up Culture and Grievance Mechanisms 117
- 13.10 Data Privacy, Information Security and Digital Trust 118
- 13.11 Responsible Technology and AI Governance..... 119
- 13.12 Compliance and Continuous Improvement 120
- 13.13 Future Outlook..... 120
- 14. Sustainable Procurement and Responsible Supply Chain 122
 - 14.1 Our Approach to Responsible Procurement 122
 - 14.2 Sustainable Procurement Performance Snapshot 123
 - 14.3 Governance and Integration..... 124
 - 14.4 Supplier Code of Conduct 127
 - 14.5 Supplier Onboarding and Due Diligence..... 129
 - 14.6 Supplier Segmentation and Risk Based Oversight..... 131
 - 14.7 Supplier Engagement and Capability Building 133
 - 14.8 Sustainable and Inclusive Sourcing..... 135
 - 14.9 Green Procurement and Circular Economy Integration 138
 - 14.10 Supply Chain Cybersecurity, Privacy and Digital Trust 143
 - 14.11 Monitoring, Evaluation and Continuous Improvement..... 147
 - 14.12 Sustainable Procurement Roadmap..... 150
 - 14.13 Future Outlook..... 152
- 15. Product Responsibility, Data Privacy and Digital Trust 155
 - 15.1 Product Responsibility in a Digital Trust Economy..... 155
 - 15.2 Our Approach towards innovation..... 156
 - 15.3 SunTec Xelerate as a Responsible Digital Product 157
 - 15.4 BIAN Alignment, Interoperability and Open Architecture 158
 - 15.5 Data Integrity and Customer Privacy 159
 - 15.6 Global Regulatory Compliance 160





15.7 Responsible Data Processing 161

15.8 Product Design, Security and Privacy by Architecture 162

15.9 Cybersecurity and Data Protection Framework..... 163

15.10 User Privacy and Rights 164

15.11 Third-Party Risk and Data Protection Controls 164

15.12 Product Sustainability and Green Digital Operations..... 166

15.13 Training, Awareness and Governance 167

15.14 Product Responsibility Performance Indicators 168

16. ESG Performance, Metrics, Milestones and Insights..... 170

16.1 Approach to ESG Measurement 170

16.2 ESG Metrics Dashboard 170

16.3 Labour, Human Rights and Social Performance Dashboard 173

16.4 Ethics, Compliance and Governance Dashboard..... 176

16.5 Sustainable Procurement Dashboard 177

16.6 Product Responsibility and Responsible Technology Dashboard 178

16.7 ESG Targets and Milestones Tracker 179

16.8 ESG Maturity Assessment..... 180

16.9 Notes on Data Boundaries and Methodology..... 181

16.10 Future Outlook..... 181

17. Looking Ahead for the next year 183

18. SunTec Policy Framework..... 184

19. External Assurance..... 186

20. GRI, SASB, and Ecovadis Content index..... 194

20.1 GRI content index..... 194

20.2 SASB content index 199

20.3 Ecovadis Content Index..... 200



Executive Summary

SunTec Business Solutions is pleased to present its Environmental, Social, and Governance (ESG) Report for the reporting period covering Financial Years 2024–25 and 2025–26 (April 1, 2024, to March 31, 2026). This report reflects our continued commitment to responsible business practices, sustainable value creation, stakeholder trust, and long-term organizational resilience.

As a global provider of pricing, billing, revenue management, and customer engagement solutions for financial services, digital communications, and technology enterprises, we recognize that sustainable business success extends beyond financial performance. It requires responsible stewardship of environmental resources, investment in people and communities, strong governance systems, ethical conduct, digital trust, and transparent stakeholder engagement.

Over the past two years, SunTec has significantly strengthened its ESG foundations. Building upon the commitments outlined in our inaugural ESG Report, we have expanded our ESG governance framework, enhanced policy coverage, strengthened risk management processes, integrated sustainability considerations into operational decision-making, and established clearer pathways for measuring and reporting ESG performance. Our ESG approach is increasingly aligned with internationally recognized frameworks and stakeholder expectations, including GRI, SASB, EcoVadis, and relevant regulatory developments.

Environmental stewardship continues to be an important focus area. During the reporting period, we continued efforts to improve energy efficiency, enhance resource management practices, strengthen waste segregation and responsible disposal mechanisms, and preserve biodiversity within our operational ecosystem. Our flagship Technocity campus remains a key enabler of our sustainability journey, supported by extensive green infrastructure and environmental conservation initiatives. We have also advanced our understanding of greenhouse gas emissions and climate-related impacts, laying the foundation for future reduction strategies and long-term climate commitments. The environmental goals established in our ESG roadmap continue to guide our efforts towards energy efficiency, renewable energy adoption, resource optimization, and eventual carbon neutrality.

Our people remain at the heart of our success. SunTec continues to foster an inclusive, diverse, and equitable workplace where employees are empowered to grow, innovate, and contribute meaningfully. During the reporting period, we further strengthened our talent management practices, learning and development initiatives, employee wellbeing programs, and diversity and inclusion efforts. Supported by a comprehensive policy framework covering talent development, human rights, occupational health and safety, prevention of harassment, and diversity, equity, and inclusion, we remain committed to creating a workplace where every individual can thrive.

As a responsible corporate citizen, SunTec continued to expand its social impact initiatives through education, healthcare, community development, and employee volunteering programs.

Through sustained engagement with local communities and our CSR initiatives, we strive to create meaningful and measurable societal impact while contributing to broader sustainable development goals.

Strong governance remains the cornerstone of our ESG approach. During the reporting period, we further strengthened governance structures, business ethics programs, information security controls, privacy management systems, risk management practices, and business continuity capabilities. Our expanding governance ecosystem is supported by a broad suite of policies and management systems covering ethics, human rights, cybersecurity, privacy, sustainable procurement, artificial intelligence, business continuity, environmental management, and responsible business conduct.

Given the nature of our business, digital trust and product responsibility remain critical priorities. We continue to invest in information security, privacy protection, cyber resilience, responsible technology practices, and ethical use of emerging technologies. Supported by internationally recognized management systems and a mature governance framework, we remain committed to safeguarding customer data, maintaining operational resilience, and delivering trusted solutions that create sustainable value for clients and end-users.

Our ESG journey remains a continuous process of learning, improvement, and accountability. While we are proud of the progress achieved during this reporting period, we recognize that sustainability expectations continue to evolve. Looking ahead, we will continue strengthening ESG integration across strategy, operations, products, people practices, procurement, and governance systems. We remain committed to enhancing transparency, improving ESG performance, engaging stakeholders meaningfully, and contributing positively to the communities, industries, and ecosystems in which we operate.

At SunTec, we believe that sustainable growth, technological innovation, responsible governance, and human-centred development are mutually reinforcing objectives. Through our continued ESG journey, we seek to create long-term value for our customers, employees, shareholders, partners, communities, and future generations.

1. About this report



This report presents SunTec Business Solutions' Environmental, Social, and Governance (ESG) performance, initiatives, governance approach, and sustainability progress for the reporting period covering Financial Years 2024–26 (April 1, 2024, to March 31, 2026). The report reflects the organization's continued efforts towards strengthening responsible business practices, enhancing ESG governance maturity, and integrating sustainability considerations into its operations, people practices, technology ecosystem, and long-term strategic direction.

The report has been prepared as part of our ongoing commitment towards transparency, accountability, stakeholder engagement, and continuous improvement across environmental, social, and governance dimensions. It outlines our evolving ESG framework, governance mechanisms, operational initiatives, key focus areas, progress achieved during the reporting period, and immediate strategic priorities for the future.

We operate across multiple global locations and serve customers and stakeholders across diverse markets and geographies. However, considering the presence of SunTeciens outside Thiruvananthapuram, India is very limited, the scope of this report is primarily focused on the organization's principal operational single campus in Thiruvananthapuram and core business operations in India, with selective inclusion of relevant global initiatives, enterprise-wide governance practices, certifications, and organizational commitments where applicable.

Accordingly, this report predominantly reflects:

- ESG-related initiatives, operational practices, and governance mechanisms implemented across SunTec's primary India operations
- Activities and sustainability initiatives undertaken at the organization's main campus
- Enterprise-wide governance frameworks, policies, certifications, and sustainability commitments applicable across the broader organization
- Select global ESG alignments, stakeholder initiatives, and sustainability-related programs relevant at the organizational level

While several governance frameworks, operational standards, information security practices, ESG policies, and organizational principles apply globally across SunTec operations, certain environmental, workforce, supplier, and operational metrics disclosed within this report may currently be limited primarily to India-based operations due to varying levels of data availability, operational integration, regional applicability, and ESG measurement maturity across locations.

We recognize the importance of progressively expanding ESG reporting coverage across its broader global footprint over time. Accordingly, we continue to strengthen ESG governance structures, operational integration, reporting processes, data collection mechanisms, and measurement capabilities with the objective of improving reporting completeness, consistency, comparability, and global coverage in future reporting cycles. We have always believed in our collective responsibility as an organization towards the environment and have actively encouraged our employees to be conscious of their individual responsibility towards the environment from inception.

The report also reflects our broader commitment towards aligning business practices with globally recognized principles relating to environmental stewardship, ethical governance, workforce wellbeing, diversity and inclusion, human rights, operational resilience, responsible technology usage, data privacy, cybersecurity, and sustainable value creation.

This report has been developed with reference to globally recognized ESG and sustainability reporting frameworks and principles, including:

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- Global Reporting Initiative (GRI)
- Sustainability Accounting Standards Board (SASB)
- EcoVadis sustainability assessment principles
- United Nations Sustainable Development Goals (SDGs)
- United Nations Global Compact (UNGC) principles

The ESG disclosures, narratives, and metrics presented in this report are based on information available during the reporting period and have been compiled through internal governance mechanisms, operational reviews, stakeholder engagement processes, policy frameworks, and organizational reporting practices. As our ESG journey continues to evolve, we remain committed to continuously strengthening our reporting maturity, enhancing data quality, improving transparency, and expanding the depth and breadth of ESG disclosures in future reports.

We have multiple offices and entities across the world, but this report covers all entities across the world that are under the ambit of SunTec Business Group including those in India, UAE, Singapore, Australia, UK, Canada, and multiple parts of Europe. ¹

This report is published on an annual basis, and this report is for the period of two financial years - FY 2025 and FY 2026. For any queries, please contact karthikvj@suntecsbs.com. ²

Through this report, we aim to provide stakeholders with a transparent overview of the organization's ESG journey, governance philosophy, operational priorities, sustainability initiatives, and long-term commitment towards building a responsible, resilient, ethical, and future-ready organization.

¹ GRI 2-2 Entities included in the organization's sustainability reporting

² GRI 2-3 Reporting period, frequency and contact point

2. Integrating Business Excellence with Conscious Value Creation



Figure 2.1 – Rainwater harvesting at our Trivandrum Campus

The world is undergoing a period of unprecedented transformation. Climate change, evolving regulatory expectations, rapid technological advancement, growing cybersecurity threats, changing workforce aspirations, and increasing stakeholder scrutiny are reshaping the way organizations create and sustain value. Businesses today are expected to deliver more than financial performance alone. They are increasingly evaluated on their ability to operate responsibly, manage risks effectively, build resilient organizations, contribute positively to society, and create sustainable long-term value for all stakeholders.

For us, these developments are not external trends to be monitored from a distance—they are realities that directly influence the industries we serve and the way we conduct our business.

As a global technology provider enabling digital transformation for financial institutions, digital enterprises, and communication service providers, we recognize that our role extends beyond delivering technology solutions with a responsibility to operate with integrity, protect stakeholder interests, support sustainable growth, foster an inclusive workplace, and contribute positively to the communities and ecosystems within which we operate.

Environmental, Social, and Governance (ESG) considerations therefore form an integral part of our business strategy and long-term vision. We view ESG not as a standalone initiative, reporting obligation, or compliance exercise, but as a framework that strengthens our ability to create enduring value. ESG enables us to better manage risks, attract and retain talent, strengthen customer trust, improve operational resilience, support innovation, and position the organization for long-term sustainable growth.

As sustainability expectations continue to evolve across customers, regulators, investors, employees, and business partners, ESG has become increasingly important to business competitiveness. Customers are seeking partners that demonstrate strong governance, data security, ethical business practices, and environmental responsibility. Employees increasingly prefer organizations that provide purpose-driven work environments, prioritize wellbeing, and promote diversity and inclusion. Regulators continue to strengthen expectations around transparency, accountability, privacy, cybersecurity, and sustainability disclosures. These developments reinforce our belief that ESG is fundamentally connected to business performance and future readiness.

2.1 Our ESG pillars

Our ESG approach is built around three interconnected pillars that guide decision-making across the organization.



Environmental Responsibility

We are committed to minimizing our environmental footprint while supporting the transition towards a more sustainable future. Although the technology sector generally has a lower direct environmental impact compared to many industrial sectors, we recognize that our facilities, infrastructure, energy consumption, resource utilization, waste generation, and supply chain activities carry environmental responsibilities that must be managed effectively.

Our environmental focus areas include improving energy efficiency, reducing greenhouse gas emissions, promoting responsible consumption of resources, strengthening waste management practices, increasing environmental awareness, and exploring opportunities for renewable energy adoption. We continue to enhance our understanding of climate-related risks and opportunities while integrating sustainability considerations into operational decision-making.³

We also recognize the important role technology can play in enabling sustainability outcomes. Digital transformation, intelligent automation, cloud-native platforms, and data-driven decision making can help organizations optimize resources, improve efficiency, and build more sustainable operating models. Through our products and solutions, we seek to support customers in achieving their own business transformation and sustainability objectives.

Social Responsibility

People remain at the heart of our success. Our ability to innovate, serve customers, and deliver sustainable growth depends on the talent, commitment, and wellbeing of our employees. We therefore strive to create a workplace culture that is inclusive, empowering, collaborative, and focused on continuous learning and development.

Our social priorities include attracting and retaining diverse talent, strengthening employee wellbeing, promoting diversity, equity and inclusion, supporting career development, fostering leadership capabilities, upholding human rights, and maintaining safe and respectful workplaces. We believe that organizations that invest in people are better positioned to innovate, adapt, and succeed in a rapidly changing business environment.

Employee wellbeing continues to be a key area of focus. We are committed to creating an environment that supports physical, emotional, and mental wellbeing through a variety of engagement, wellness, learning, and support initiatives. We also continue to invest in building future-ready capabilities through structured learning programs, leadership development initiatives, technical training, and career progression frameworks.

Beyond our workforce, we remain committed to creating positive social impact within the communities where we operate. Through our CSR initiatives under the SNEHA (Sustainable Nurturing through Education and Health Activities) platform, we support programs focused on education, healthcare, social inclusion, and community development. These initiatives reflect our belief that businesses have an important role to play in contributing to inclusive and equitable societal progress.

Governance and Ethical Business Conduct

Strong governance provides the foundation for sustainable business performance. We believe that transparency, accountability, ethical conduct, and effective oversight are essential for maintaining stakeholder trust and ensuring long-term organizational resilience.

³ GRI 2-22 – Statement of sustainable energy

Our governance framework focuses on ethical business practices, regulatory compliance, risk management, business continuity, cybersecurity, information security, data privacy, and responsible technology governance. We continue to strengthen governance structures and accountability mechanisms that support effective ESG implementation and oversight across the organization.

As a technology company operating in a highly connected and data-driven environment, we recognize that digital trust is increasingly becoming a critical component of responsible business conduct. Protecting information assets, maintaining cybersecurity resilience, safeguarding personal data, and ensuring responsible use of emerging technologies are fundamental to sustaining stakeholder confidence and supporting long-term business success.

Our governance framework is supported by a comprehensive suite of policies covering ethics, human rights, diversity and inclusion, environmental stewardship, sustainable procurement, information security, privacy, cybersecurity, business continuity, supplier conduct, artificial intelligence usage, and responsible workplace practices. Together, these frameworks help embed ESG principles into everyday operations and decision-making.

2.2 From Commitment to Measurable Impact

As our ESG journey continues to evolve, our focus is increasingly shifting from commitments to measurable outcomes. While policies, aspirations, and governance structures remain important, we believe that long-term credibility is built through execution, transparency, and continuous improvement.

Over the past year, we have continued to strengthen ESG governance, enhance performance measurement mechanisms, improve data collection and reporting processes, and expand integration of ESG considerations across business functions. We are progressively adopting a more metrics-driven approach that enables us to monitor performance, assess progress, identify improvement opportunities, and strengthen accountability across environmental, social, and governance dimensions.

We recognize that ESG is a continuous journey rather than a destination. Expectations, risks, technologies, and sustainability challenges will continue to evolve. Our commitment is to evolve alongside them—strengthening resilience, enhancing transparency, driving innovation, and creating sustainable value for customers, employees, partners, communities, and society at large.

This report reflects our progress, priorities, and ongoing commitment to building a responsible, resilient, and future-ready organization while integrating business practices with conscious behaviour for sustainable value creation.

3. Message from our leadership

3.1 Message from the CEO and Founder



For more than two decades, SunTec has been guided by a simple belief — sustainable success is built on trust, innovation, and responsible growth. While technology continues to transform industries at an unprecedented pace, the values that define enduring organizations remain unchanged: integrity, accountability, respect for people, and a commitment to creating long-term value for society.

As a global technology partner to leading financial institutions, digital enterprises, and communication service providers, we recognize that our responsibilities extend beyond delivering technology solutions. The platforms we build support critical business processes for organizations across the world, and with that comes an obligation to operate responsibly, safeguard stakeholder interests, and contribute positively to the communities and environments in which we operate.

Over the years, Environmental, Social and Governance (ESG) considerations have become increasingly integrated into the way we run our business. Rather than treating ESG as a separate initiative, we view it as an extension of our long-standing commitment to responsible business practices. It influences how we govern our organization, support our people, engage with customers and partners, manage risks, and plan for the future.

During the reporting period, we continued to strengthen the foundations of our ESG journey. We expanded our governance framework, enhanced accountability mechanisms, strengthened our policy ecosystem, and improved our ability to measure and monitor ESG performance across the organization. These efforts are helping us move beyond commitments towards measurable outcomes and continuous improvement

Our people continue to be the driving force behind our success. We remain committed to fostering a workplace that promotes learning, inclusion, wellbeing, and innovation. Through continued investments in employee development, leadership programs, wellness initiatives, and diversity and inclusion efforts, we are creating an environment where individuals can thrive while contributing meaningfully to our collective success.

Beyond our organization, we continue to support communities through our CSR initiatives under the SNEHA platform. Our efforts in education, healthcare, community development, and social

inclusion reflect our belief that businesses have an important role to play in creating positive and lasting societal impact.

As a technology company, we also recognize that digital trust has become one of the defining expectations of our stakeholders. Strengthening cybersecurity, protecting data privacy, ensuring operational resilience, and promoting responsible technology practices remain important priorities for us. These capabilities are fundamental to maintaining the confidence of our customers and supporting sustainable growth in an increasingly digital world.

We are encouraged by the progress we have made, but we also recognize that sustainability is a continuous journey. The challenges facing businesses and society will continue to evolve, and so must our response. We remain committed to strengthening ESG integration across our operations, improving transparency, driving measurable impact, and building a resilient organization capable of creating long-term value for all stakeholders.

I would like to thank our employees, customers, partners, suppliers, and communities for their continued trust and support. Their collaboration and commitment enable us to move forward with confidence as we work towards building a more responsible, sustainable, and future-ready organization.

Together, we will continue to create value that extends beyond business performance and contributes positively to the world around us.

With warm regards for a more responsible future,

Nanda Kumar K

Founder and CEO

SunTec Business Solutions

3.2 Message from the Board of Directors

At SunTec, we believe that sustainable business success is built on a strong foundation of governance, accountability, ethical conduct, and responsible decision-making. As the Board of Directors, we are committed to ensuring that Environmental, Social, and Governance (ESG) considerations remain integrated into our strategic priorities, risk management processes, and long-term value creation objectives.

Over the past year, we have continued to strengthen our ESG governance framework through enhanced oversight, policy development, and performance monitoring. Our focus has been on ensuring that sustainability considerations are embedded into business operations, leadership accountability, and decision-making processes across the organization. We have also continued to review emerging risks and opportunities related to climate change, technology,

cybersecurity, human capital, regulatory developments, and stakeholder expectations to ensure the resilience and long-term sustainability of our business.

As a technology company serving leading financial institutions and digital service providers globally, we recognize our responsibility to uphold the highest standards of business ethics, data privacy, information security, and corporate governance. We remain committed to fostering a culture of integrity, transparency, fairness, and accountability while protecting the interests of our customers, employees, shareholders, partners, and the communities in which we operate.

During the reporting period, we further strengthened our governance and policy framework, advanced our ESG oversight mechanisms, and continued to support initiatives that promote diversity, employee well-being, responsible innovation, environmental stewardship, and community development. We are particularly encouraged by the progress made in enhancing our sustainability practices and embedding ESG considerations into our long-term growth strategy.

The Board remains committed to providing effective oversight of SunTec's ESG ambitions and ensuring that our commitments are supported by measurable objectives, transparent reporting, and continuous improvement. We recognize that sustainability is an evolving journey that requires collaboration, innovation, and accountability at every level of the organization.

On behalf of the Board of Directors, we extend our sincere appreciation to our employees, customers, business partners, shareholders, and other stakeholders for their continued trust and support. Together, we will continue to build a resilient, responsible, and future-ready organization that creates sustainable value for all stakeholders.

G Vijayaraghavan

Director and Board Representative – ESG Committee
SunTec Business Solutions

3.3 Message from the ESG Committee

At SunTec, we view ESG as an important component of responsible business management and long-term value creation. The role of the ESG Committee is to provide direction, oversight, and coordination for ESG initiatives across the organization while ensuring that sustainability considerations are progressively integrated into business operations, governance processes, and decision-making frameworks.

Over the past year, we have focused on strengthening the foundations of our ESG program and advancing our ESG maturity. Our efforts have centred on building a structured governance framework, enhancing accountability mechanisms, expanding policy coverage, improving ESG data management, and strengthening alignment with globally recognized sustainability principles and best practices.

A key area of progress has been the expansion and strengthening of our ESG policy ecosystem. During the reporting period, we continued to enhance policies and management frameworks

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covering environmental stewardship, human rights, diversity and inclusion, employee wellbeing, ethics and compliance, sustainable procurement, supplier conduct, cybersecurity, data privacy, information security, business continuity, responsible use of artificial intelligence, and corporate governance. These frameworks provide the foundation for embedding ESG considerations into day-to-day operations and business decisions across the organization.

MESSAGE FROM THE ESG COMMITTEE



We have also continued to strengthen governance mechanisms that support ESG implementation. Through cross-functional collaboration and periodic reviews, the ESG Committee works closely with business leaders and functional teams to identify priorities, monitor progress, review emerging risks, and drive continuous improvement across environmental, social, and governance dimensions.

As part of our environmental stewardship efforts, we continued to promote resource efficiency, environmental awareness, and sustainable workplace practices. We are particularly encouraged by the progress associated with our Technocity campus, which has been designed with sustainability considerations at its core and is progressing towards certification under the Indian Green Building Council (IGBC) framework. The campus reflects our broader commitment to creating environmentally responsible and future-ready infrastructure.

On the social front, our focus remains on fostering an inclusive, diverse, and engaging workplace where employees can learn, grow, and succeed. We continue to invest in employee wellbeing, learning and development, leadership capability building, diversity and inclusion initiatives, and programs that support a positive workplace culture. We also remain committed



to creating meaningful impact in the communities we serve through our CSR and community engagement initiatives.

During the reporting period, we also made significant progress in strengthening ESG measurement and reporting capabilities. We continued to enhance data collection processes, improve KPI monitoring mechanisms, and establish more structured approaches to ESG performance review. We believe that robust data, measurable targets, and transparent reporting are essential to driving accountability and demonstrating meaningful progress.

While we are encouraged by the advancements made during the reporting period, we recognize that ESG expectations continue to evolve. Looking ahead, our priorities include further strengthening ESG integration across business functions, enhancing environmental performance measurement, expanding supplier sustainability initiatives, advancing responsible technology governance, deepening stakeholder engagement, and improving ESG disclosures and reporting practices.

We would like to thank employees, customers, suppliers, partners, and other stakeholders who continue to contribute to and support our ESG journey. Through collective effort, collaboration, and continuous improvement, we remain committed to building a responsible, resilient, and sustainable organization that creates long-term value for all stakeholders.

Karthik VJ

Lead – ESG Committee

SunTec Business Solutions



4. Highlights during this period

4.1 Building a Responsible, Ethical and Resilient Organization

Our people remain at the heart of our success. During the reporting period, we continued to strengthen our employee value proposition through enhanced wellbeing programs, learning opportunities, diversity and inclusion initiatives, workplace safety measures, and employee engagement activities.

Key milestones included the introduction and enhancement of Diversity, Equity and Inclusion (DEI) and Occupational Health and Safety policies, expanded health and wellness programs, mental wellbeing support through professional counselling services, and multiple employee engagement and cultural initiatives. We strengthened employee welfare through comprehensive health insurance coverage, healthcare partnerships with leading hospitals, preventive medical camps, financial wellness sessions, and workplace amenities designed to enhance employee experience and wellbeing.⁴

Our commitment to employee health and wellbeing was further reinforced through yoga and fitness initiatives, health awareness programs, first-aid and CPR training, sports tournaments, wellness camps, and expanded recreational infrastructure including gymnasium, swimming pool, sports facilities, and employee clubhouse amenities. We also continued to foster an inclusive workplace culture through employee feedback mechanisms, DEI initiatives, cultural celebrations, and leadership development programs.

⁴ GRI 403-6

4.2 Environmental Highlights



Environmental stewardship continued to be a key focus area during the reporting period.

*A major milestone was the achievement of the **IGBC Green New Buildings Platinum Certification**, recognizing the Technocity campus as one of India's highest-performing sustainable buildings. The certification reflects excellence across energy efficiency, water stewardship, sustainable site planning, waste management, biodiversity conservation, and occupant wellbeing.*

The campus incorporates numerous sustainability features, including 34% native and drought-tolerant landscaping, preservation and enhancement of biodiversity through more than 15,000+ trees, rainwater harvesting infrastructure, wastewater treatment and reuse systems, and advanced water-efficiency measures that reduce potable water consumption by over 50% compared to conventional buildings.

Energy efficiency remained another significant achievement area. Through passive architectural design, efficient HVAC systems, high-performance building materials, shading strategies, and optimized energy management, the campus achieved approximately 38.5% energy cost savings compared to baseline standards.

Environmental awareness was also strengthened through employee participation in World Environment Day, Earth Hour, World Water Day, International Day of Forests, beach clean-up activities, e-waste collection drives, and biodiversity awareness initiatives.

Key ESG Milestones

- Achieved IGBC Green New Buildings Platinum Certification
- 38.52% energy cost savings versus baseline building performance
- 51% reduction in potable water consumption
- 100% wastewater treatment and reuse through onsite STP
- 15,000+ trees with a 34% native landscape coverage within our campus
- Expanded environmental awareness through internal volunteering initiatives

4.3 Community and Social Impact Highlights

Through our CSR program, SNEHA (Sustainable Nurturing through Education and Health Activities), we continued to create meaningful impact across education, healthcare, community welfare, and environmental conservation.

During the reporting period, we supported school children through educational assistance programs, school kit distribution drives, scholarship initiatives, and community outreach activities. We continued our engagement with childcare homes, tribal communities, and underprivileged groups through structured volunteering, donation drives, and festive outreach programs.

Our employees actively participated in blood donation campaigns, disaster relief initiatives, community fundraising efforts, inclusive walkathons, environmental volunteering programs, and festive giving initiatives such as the Wish Tree campaign. SNEHA's Wish Tree campaign enabled SunTeciens to fulfil the wishes of underprivileged children and individuals by providing essential items and meaningful festive support. Support for Wayanad relief efforts and various community development programs demonstrated our commitment to creating positive societal impact beyond our organizational boundaries. Wayanad is a district in north-east Kerala, in the Western Ghats, bordering the states of Karnataka and Tamil Nadu.

Key ESG Milestones

- Expanded education-focused CSR initiatives
- Continued support for healthcare and community wellbeing programs
- Employee-led blood donation and volunteering initiatives
- Wayanad disaster relief support and fundraising efforts
- Inclusive community engagement and outreach programs
- Enhanced environmental volunteering activities

4.4 Governance and Ethics Related Highlights

Strong governance, ethical conduct, information security, and business resilience remained central to our operations during the reporting period.

We strengthened our governance framework through enhanced ESG oversight, expanded policy coverage, continuous compliance programs, and robust information security management practices. The successful achievement and maintenance of internationally recognized certifications including ISO 27001, ISO 22301, ISO 9001, and SOC 2 Type II further reinforced our commitment to operational excellence, resilience, and stakeholder trust.

As digital trust becomes increasingly important, we expanded employee awareness and governance programs covering cybersecurity, phishing prevention, deepfake fraud awareness, cloud security, responsible AI usage, incident reporting, privacy protection, and secure development practices.

We also enhanced business continuity preparedness through emergency response programs, evacuation drills, fire safety awareness campaigns, BCMS exercises, internal audits, and governance reviews.⁵

Key ESG Milestones

- Achieved and maintained ISO 27001, ISO 22301, ISO 9001, and SOC 2 Type II certifications
- Introduced a Responsible AI governance framework
- Expanded cybersecurity and digital trust initiatives
- Strengthened business continuity and emergency preparedness programs
- Enhanced policy governance through SunQMS, our internal Quality Management System used for policy governance, documentation, compliance oversight, and process control
- Improved ESG governance and compliance oversight

4.5 Sustainable Procurement Highlights

We continued to strengthen our sustainable procurement approach by integrating environmental, social, and governance considerations into supplier selection, contractor management, and procurement decision-making processes.

Our procurement philosophy extends beyond cost and quality considerations to include responsible business practices, worker welfare, environmental stewardship, ethical conduct, and long-term supplier relationships. During the reporting period, we strengthened supplier governance through enhanced policies, supplier expectations, and sustainability-related

⁵ GRI 403-4

requirements covering ethics, compliance, human rights, workplace safety, and environmental responsibility.

As part of our commitment to supporting local economic development and reducing environmental impacts associated with transportation and logistics, we continue to prioritize local and regional suppliers wherever feasible. By engaging local businesses and service providers, we contribute to local economic growth, strengthen community ecosystems, improve supply chain responsiveness, and reduce transportation-related environmental impacts.

Our infrastructure and campus development initiatives incorporated sustainable construction practices, responsible contractor management, worker welfare requirements, and the use of certified and environmentally responsible materials. Contractor obligations included provisions relating to workplace safety, sanitation facilities, drinking water, personal protective equipment, first-aid facilities, and worker wellbeing. These requirements help ensure that responsible business practices extend throughout our value chain.

Key ESG Milestones

- Strengthened the Sustainable Procurement framework
- Enhanced supplier governance and accountability mechanisms
- Prioritized local and regional suppliers where feasible

Embedded worker welfare requirements into contractor management

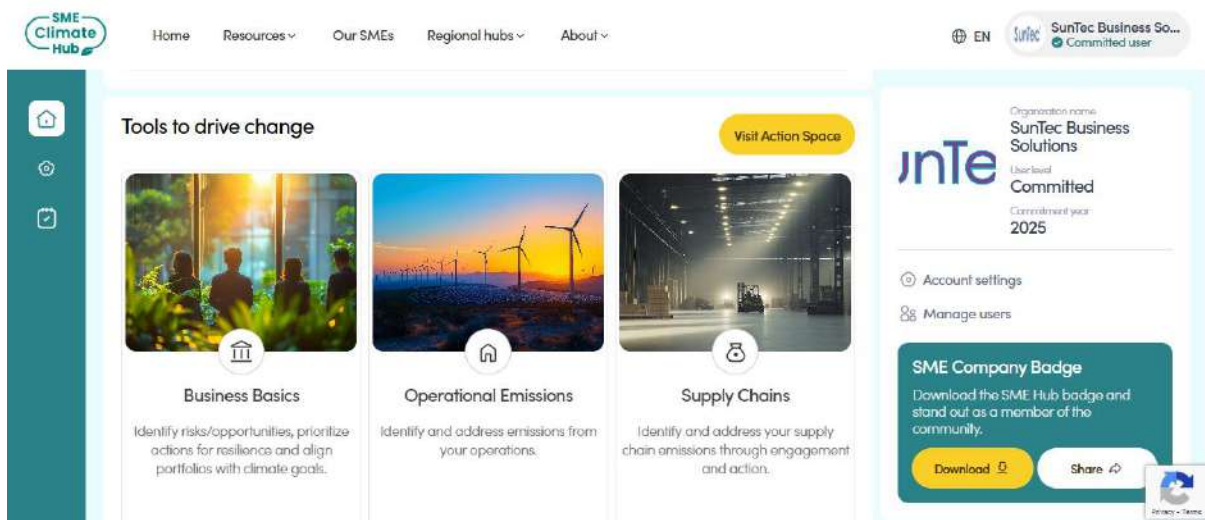
- Promoted responsible sourcing and certified material usage
- Integrated ESG considerations into procurement practices
- Strengthened supplier expectations through policy and governance frameworks

Our Sustainable Procurement Focus Areas

- Ethical and responsible sourcing
- Support for local suppliers and local economic development
- Worker welfare and labour standards
- Environmental responsibility across the supply chain
- Supplier compliance and governance
- Long-term supplier partnerships and responsible business conduct.



4.6 Global Commitments and Certifications



At SunTec, our ESG journey is guided by globally recognized sustainability principles, governance frameworks, and management system standards.

These commitments help us strengthen accountability, benchmark performance, enhance stakeholder trust, and drive continuous improvement across environmental, social, and governance dimensions.

4.6.1 Global Sustainability Commitments

Our ESG initiatives are aligned with internationally recognized frameworks and principles that support responsible business conduct, sustainable development, ethical governance, and transparent reporting.

United Nations Sustainable Development Goals (UN SDGs)

We contribute towards the achievement of the United Nations Sustainable Development Goals through our initiatives related to employee wellbeing, education, community development, environmental stewardship, responsible business conduct, and innovation.

United Nations Global Compact (UNGC)

Our policies and practices are aligned with the principles of the United Nations Global Compact covering human rights, labour standards, environmental responsibility, and anti-corruption.

Global Reporting Initiative (GRI)

This report has been prepared with reference to the Global Reporting Initiative (GRI) Standards, supporting transparency and consistency in ESG disclosures.

Sustainability Accounting Standards Board (SASB)

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We continue to strengthen our ESG reporting approach by considering relevant SASB disclosures applicable to the technology and software industry.

EcoVadis Sustainability Framework

Our ESG program continues to evolve in alignment with EcoVadis sustainability assessment principles covering Environment, Labour and Human Rights, Ethics, and Sustainable Procurement.

United Nations Women's Empowerment Principles (UN WEPs)

As a signatory to the Women's Empowerment Principles, SunTec is committed to advancing gender equality and fostering an inclusive workplace. We promote equal opportunity, diversity, leadership development, fair treatment, and a culture of respect and belonging across the organization.

SME Climate Hub

SunTec has committed to climate action through the SME Climate Hub, supporting the global objective of limiting global warming and advancing the transition to a low-carbon economy. Through this commitment, we continue to strengthen our climate governance, emissions management practices, resource efficiency initiatives, and long-term decarbonization journey.

4.6.2 Management System Certifications

To ensure operational excellence, business resilience, quality, and stakeholder trust, we maintain internationally recognized certifications across key areas of our operations.

ISO 27001 – Information Security Management System

Provides a structured framework for managing information security risks and protecting customer, employee, and business information assets.

ISO 22301 – Business Continuity Management System

Demonstrates our ability to maintain critical operations, respond effectively to disruptions, and ensure business resilience during unforeseen events.

ISO 9001 – Quality Management System

Supports consistent service delivery, customer satisfaction, process improvement, and operational excellence across the organization.

SOC 2 Type II

Validates the effectiveness of our controls relating to security, availability, confidentiality, and operational reliability, reinforcing customer trust in our technology platforms and services.

4.6.3 Sustainable Infrastructure Recognition

IGBC Green New Buildings Platinum Certification



Our Technocity campus has achieved the prestigious **IGBC Green New Buildings Platinum Certification**, recognizing excellence in sustainable site planning, energy efficiency, water conservation, environmental management, biodiversity enhancement, and occupant wellbeing.

The certification reflects SunTec's commitment to developing future-ready workplaces that balance business growth with environmental responsibility and resource efficiency.

4.7 Performance Snapshot

The following snapshot provides an overview of SunTec's ESG performance across key environmental, social, governance, and responsible business dimensions during the reporting period.

4.7.1 Environment Related Snapshot

<i>Indicator</i>	<i>Performance</i>
<i>IGBC Green New Buildings Certification</i>	Platinum Certified
<i>Energy Cost Savings vs. Baseline Building</i>	38.52%
<i>Potable Water Reduction</i>	51%
<i>Wastewater Treatment</i>	100%
<i>Wastewater Reuse</i>	100%
<i>Rainwater Harvesting Capacity</i>	3,131 cu.m
<i>Native and Drought-Tolerant Landscape</i>	34% of Landscape Area
<i>Trees Planted and Maintained</i>	15,000+
<i>Covered Parking Spaces</i>	100%
<i>CFC-Free HVAC Systems</i>	Yes

4.7.2 People and Workplace Related Snapshot

<i>Indicator</i>	<i>Performance</i>
<i>Employee Health Insurance Coverage</i>	100% Eligible Employees
<i>Professional Counselling Support</i>	Available
<i>Diversity, Equity and Inclusion Policy</i>	Implemented
<i>Occupational Health and Safety Policy⁶</i>	Implemented
<i>Learning and Development Programs</i>	Ongoing
<i>Employee Wellness Programs</i>	Expanded
<i>Sports and Recreation Facilities</i>	Available
<i>Accessible Infrastructure</i>	Fully Integrated

⁶ GRI 403-1 Occupational Health and Policy



Key Accessibility Features in our campus | Accessible Campus and Parking, Visual Warning Signs etc.

4.7.3 Community Impact Related Snapshot

<i>Indicator</i>	<i>Performance</i>
<i>CSR Platform</i>	SNEHA
<i>Focus Areas</i>	Education, Healthcare, Community Development
<i>Community Outreach Programs</i>	Ongoing
<i>Employee Volunteering Programs</i>	Active
<i>School Support Initiatives</i>	Continued
<i>Healthcare Support Programs</i>	Continued
<i>Disaster Relief and Community Assistance</i>	Undertaken

4.7.4 Governance, Ethics and Digital Related Snapshot

<i>Indicator</i>	<i>Performance</i>
<i>ESG Governance Framework</i>	Operational
<i>ESG Committee</i>	Active
<i>Board ESG Oversight</i>	Active
<i>Whistleblower Mechanism</i>	Operational
<i>Responsible AI Governance</i>	Implemented
<i>Information Security Framework</i>	Strengthened
<i>Business Continuity Framework</i>	Strengthened
<i>Cybersecurity Awareness Programs</i>	Conducted

4.7.5 Sustainable Procurement Related Snapshot

<i>Indicator</i>	<i>Performance</i>
<i>Sustainable Procurement Framework</i>	Implemented
<i>Supplier Code of Conduct</i>	Implemented
<i>Local Supplier Preference</i>	Practiced Wherever Feasible
<i>ESG Considerations in Procurement</i>	Integrated
<i>Worker Welfare Requirements for Contractors</i>	Embedded for all 30 contractors ⁷
<i>Responsible Material Selection</i>	Adopted

4.7.6 Certifications and Assurances

SunTec maintains internationally recognized management system certifications that support operational excellence, stakeholder trust, resilience, and responsible governance.

⁷ 2-8 Non workers





The organization's management systems are independently assessed against internationally accepted standards and are periodically reviewed to ensure continued effectiveness and compliance. The following are the key certifications we maintain

- ISO 9001 – Quality Management System
- ISO 27001- Information Security Management System
- ISO 22301 – Business Continuity Management System
- SOC 2 Certification

4.7.7 Global Commitments⁸

<i>Framework</i>	<i>Alignment Status</i>
<i>United Nations Sustainable Development Goals (SDGs)</i>	Aligned
<i>United Nations Global Compact (UNGC) Principles</i>	Aligned
<i>Global Reporting Initiative (GRI)</i>	Referenced
<i>Sustainability Accounting Standards Board (SASB)</i>	Referenced
<i>EcoVadis Sustainability Framework</i>	Aligned
<i>SME Climate Hub</i>	Aligned
<i>UN Women’s Empowerment Principles</i>	Aligned

4.8 Key Metrics

<i>Metric</i>	<i>FY 2023–24</i>	<i>FY 2024–25</i>	<i>FY 2025–26</i>
<i>Scope 1 Emissions (tCO₂e)⁹</i>	72	70	68
<i>Scope 2 Emissions (tCO₂e)¹⁰</i>	1,965	1,200	1,150
<i>Scope 3 Emissions – Business Travel (tCO₂e)¹¹</i>	96	54	52
<i>Total Energy Consumption (kWh¹²)</i>	3,260,000	2,000,000	1,620,000
<i>Energy Consumption Intensity¹³</i>	4,794	3,225	3,115
<i>Renewable Energy (%)</i>	6%	8%	10%
<i>Water Consumption (KL)¹⁴</i>	12,500	10,800	10,200

⁸ GRI 2-28

⁹ GRI 305-1

¹⁰ GRI 305-2

¹¹ GRI 305-3

¹² GRI 302-1, GRI 302-3

¹³ GRI 305-4, GRI 305-5

¹⁴ GRI 303-4



<i>Water Recycled (%)</i>	12%	18%	35%
<i>Waste Generated (kg)</i>	85,000	72,000	68,000
<i>Waste Recycled (%)</i>	38%	46%	52%
<i>Business Travel Volume (Trips)</i>	639	359	340
<i>Total Employees (Headcount)</i>	685	610	520 ¹⁵
<i>Women Employees (%)</i>	32%	35%	39%
<i>Women in Leadership (%)</i>	29%	31%	36%
<i>Avg. Training Hours / Employee</i>	45	50	60+
<i>Whistleblower Cases Reported (No.)</i>	0	0	0
<i>Supplier ESG Assessment Coverage (%)</i>	40%	55%	76%

¹⁵ 2-7 - Employees



5. About SunTec

5.1 Company Overview¹⁶

We are a global provider of revenue management and business assurance solutions, enabling organizations to simplify, automate, and transform complex business processes. With a strong focus on innovation, scalability, and customer-centricity, we deliver products that help enterprises manage pricing, billing, revenue realization, and partner ecosystems with greater efficiency, transparency, and control.

Founded with the vision of enabling every value exchange in the digitally driven world, over three decades ago, we have evolved into a trusted technology partner for organizations navigating digital transformation. The company's products are designed to support businesses in managing increasingly dynamic pricing models, diverse customer segments, and complex partner relationships, while ensuring accuracy, compliance, and operational efficiency.

We operate at the intersection of technology, operations, and strategy. Our products enable organizations to streamline critical processes that directly impact financial performance and customer experience. By addressing challenges such as revenue leakage, inefficiencies in billing, and lack of visibility into financial operations, we help organizations unlock value and drive sustainable growth.

We have established a strong presence in the banking and financial services sector, while also serving enterprises across other industries that require robust revenue management capabilities. Its solutions are built to support both traditional and digital-first business models, enabling clients to adapt to evolving market demands and regulatory environments.

5.2 Global Presence

We have developed a strong global footprint, serving clients across multiple geographies and markets.

With clients spanning Asia, the Middle East, Europe, North America and other regions, we combine global expertise with local insights to deliver products that are tailored to specific market needs. This global presence allows us to understand diverse regulatory environments, customer expectations, and business challenges, ensuring that its offerings remain relevant and impactful.

¹⁶ GRI 2-1 – Company Overview

Our international operations are supported by a diverse and multicultural workforce, which brings a wide range of perspectives and capabilities. This diversity enhances SunTec’s ability to innovate, collaborate, and respond to the evolving needs of its clients.

Operating across multiple geographies also brings with it a heightened responsibility to maintain consistent standards of governance, ethics, and sustainability. We are committed to ensuring that its operations across all regions adhere to globally recognized principles and best practices, including those related to human rights, labour standards, environmental protection, and ethical conduct.



5.3 Business Model and Value Proposition¹⁷

Our business model is centred on delivering high-impact, scalable technology products that enable organizations to manage complex revenue and operational processes more effectively.

Our value proposition is built around helping clients:

- Automate and streamline pricing and billing processes
- Improve accuracy and transparency in revenue management
- Reduce operational inefficiencies and risks
- Enhance customer experience through simplified and consistent processes
- Adapt to evolving business models and regulatory requirements

¹⁷ GRI 2.6 - Activities, value chain and other business relationships

By enabling organizations to operate more efficiently and transparently, we contribute to improved resource utilization and reduced operational overhead. This has a direct impact on sustainability, as optimized processes reduce waste, improve efficiency, and support digital-first operations.

5.4 Our Solutions and Products

Our flagship product, SunTec **Xelerate**, represents our vision for modern enterprise products that are unified, scalable, and adaptable. SunTec Xelerate integrates multiple capabilities into a single platform, enabling organizations to manage complex business processes with greater efficiency and agility.

Key capabilities of the product include:

- Pricing and rate management
- Billing and invoicing
- Contract and agreement management
- Partner and ecosystem management
- Revenue assurance and analytics

By consolidating these functions into a unified product, SunTec Xelerate eliminates silos, reduces duplication of effort, and improves visibility across business operations. This integrated approach enables organizations to make better decisions, respond faster to market changes, and deliver a consistent customer experience.

The product also contributes indirectly to sustainability by enabling clients to transition to digital processes, reduce manual interventions, and optimize resource usage. This aligns with broader trends towards digitalization and efficiency-driven sustainability.

5.5 Other key information

6. Our Strategic ESG Outlook and Update on our progress

6.1 Evolving ESG from Responsibility to Strategic Advantage

At SunTec Business Solutions, ESG is rapidly evolving from a compliance-driven requirement to a core driver of long-term value creation and competitive advantage. As global expectations around sustainability continue to intensify, we recognize the need to move beyond incremental improvements and adopt a more integrated, data-driven, and forward-looking approach to ESG.

The next phase of our ESG journey is focused on embedding sustainability deeply into its business strategy, strengthening measurement frameworks and accountability mechanisms, and leveraging technology to enable scalable and measurable impact. This includes advancing capabilities in emissions tracking, responsible sourcing, workforce inclusion, and ethical governance, while aligning with globally recognized standards and commitments.

Our transition reflects a fundamental shift—from managing ESG-related risks to actively identifying and unlocking ESG-driven opportunities that enhance operational resilience, strengthen stakeholder trust, and support sustainable growth in a rapidly evolving business landscape.

6.2 Our ESG Goals and Where we stand

SunTec recognizes that sustainable business growth is closely linked to the achievement of the United Nations Sustainable Development Goals (SDGs). Our ESG strategy, policies, programs, and performance targets have been aligned with the SDGs most relevant to our business, stakeholders, and areas of impact.

In the last report, we listed down several goals and commitments that were aligned with the UN Sustainable Development Goals.

In the following pages, we are showcasing the progress against the goals we achieved against our listed goals and commitments that we published in our last report. These material topics, that we identified during the last year, have been aligned with the UN Sustainable Development Goals. Our material topics and our approach have been listed in a separate section in this report.

We have achieved 43 of our 45 immediate short-term commitments (See section on ‘Progress against Material Topics)

Our ESG goals support progress across environmental stewardship, responsible business conduct, employee well-being, diversity and inclusion, sustainable innovation, community development, and responsible supply chain practices. Through ongoing monitoring and annual



reporting, we track our contributions and progress against these priorities while strengthening our long-term commitment to sustainable value creation.

The SDGs serve as an important reference framework for our ESG roadmap and help guide our efforts toward creating positive outcomes for our customers, employees, suppliers, communities, and the environment. This alignment is reflected throughout our ESG commitments, targets, initiatives, and performance disclosures.

6.3 Progress against Material Topics¹⁸

Legend for understanding the status of our commitments

	We have achieved the goal
	We are not yet there, but we will soon reach the goal
	We are not yet there/We have not begun work on the same

The linked UN SDG against each goal has been indicated alongside each material topic.

Material Topic 1 - Energy Efficiency and GHG emissions¹⁹



Goals			<ul style="list-style-type: none"> • Reduce per capita energy consumption and improve energy efficiency across all our facilities. • Achieve carbon neutrality, by 2050
Short term (1-2 years)	Medium term (3-5 years)	Long term (6-10 years)	
<ul style="list-style-type: none"> • Implement mechanisms to screen, scope, collect, calculate, and monitor SunTec’s energy consumption (direct and indirect) across all campuses. 	<ul style="list-style-type: none"> • Reduce energy consumption by 5% from baseline Year (based on office area, energy usage /Sq. feet) • 25% RE incorporation in total electricity consumption for facilities owned by SunTec 	<ul style="list-style-type: none"> • Reduce electricity consumption by another 5% (based on office area, energy usage /Sq. feet) • Meet 50% of electricity requirements from renewable energy sources for facilities owned by SunTec 	

¹⁸ GRI 3-2, 3-3

¹⁹ GRI 2-22





<ul style="list-style-type: none"> • Conduct a baseline of energy consumption in FY 2024-25 • Develop GHG inventory (Scope1, Scope2 and applicable Scope 3 categories) • Plant and maintain a forest area in SunTec Campus with over 15K trees • Explore opportunities to invest in renewable energy generating options 	<ul style="list-style-type: none"> • Implement initiatives to reduce GHG emission by 5% from baseline year by 2030 (all categories) • Enhance and maintain the green cover in SunTec's main Campus • Commit to SBTi approved target setting by 2030 	<ul style="list-style-type: none"> • Augment and maintain the existing green cover in SunTec owned facilities. • Plan and implement initiatives to achieve carbon neutrality by 2050
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Material Topic 2 – Water Management



Goals		<ul style="list-style-type: none"> • Explore opportunities and implement plans to reduce SunTec's water footprint across all facilities owned by SunTec
Short term (1-2 years)	Medium term (3-5 years)	Long term (6-10 years)
<ul style="list-style-type: none"> • Carryout water assessment for all facilities to check for water leakages, flow meter installation, estimation of wastewater generation, exploration of rainwater harvesting options. • Identify per capita freshwater consumption. 	<ul style="list-style-type: none"> • Reduce per capita freshwater consumption by 5% • Achieve 80% wastewater recycling in facilities owned by SunTec 	<ul style="list-style-type: none"> • Work on reduction in consumption and improve by another 5% • Achieve 100% wastewater recycling in facilities owned by SunTec

Material Topic 3 – Waste Management





Goals			<ul style="list-style-type: none"> • Establish standardized infrastructure to ensure waste segregation and explore ways to minimize waste to landfill • Ensure the reuse/repurposing of waste generated in our facilities • Achieve TRUE Zero Waste Certification for SunTec Campus
Short term (1-2 years)	Medium term (3-5 years)	Long term (6-10 years)	
<ul style="list-style-type: none"> • Establish standardized infra to ensure waste segregation and explore ways to minimize waste to landfill • Ban on use of single use plastics across all locations. • Continue to maintain 100% E-waste disposal through environmentally friendly methods. • Ensure food waste disposal in an environmentally friendly manner in facilities owned by SunTec 	<ul style="list-style-type: none"> • Work towards reducing generation of plastic waste. • Ensure Zero waste to landfill 	<ul style="list-style-type: none"> • Obtaining TRUE Zero Waste Certification through Green Business Certification Inc. (GBCI) 	

Material Topic 4 - Talent Attraction, Retention and Upskilling/ Development





Goals		
<ul style="list-style-type: none"> • Continue to be an equal opportunity provider in the industry and promote continual learning among our employees. • Make SunTec to be among the most sought-after place to work in the industry. • Position SunTec as an equal opportunity provider in the industry 		
Short term (1-2 years)	Medium term (3-5 years)	Long term (6-10 years)
<p>Talent Development:</p> <ul style="list-style-type: none"> • Develop and roll out various training programs to ensure that our employees including leaders adhere to the standards set by our company. • Ensure each employee undertakes a minimum of 80 hrs. of training annually which includes techno-functional, behavioural/leadership, Compliance/regulatory in the line with the present tech environment and business context. • Identify and deliver required training for contractual staff on - rights at workplace, Health and Safety, compliance and regulations and behavioural competencies.²⁰ • Identify and implement ESG-related training for different functions. <p>Talent Attraction/Retention:</p> <ul style="list-style-type: none"> • Attract and retain the top talent by providing competitive compensation and benefit • Be an equal opportunity provider in line with industry standards. • Benchmark and Implement our Compensation and benefits practices 	<p>Talent Development:</p> <ul style="list-style-type: none"> • Continuously update Career Development programs in line with the latest/futuristic tech environment and business strategy • Identify critical positions, assess potential successors, and implement targeted development plans. • Identify and mandate specific ESG related trainings for critical functions and top management. <p>Talent Attraction/Retention:</p> <ul style="list-style-type: none"> • Get external recognition in talent related practices 	<p>Talent Development:</p> <ul style="list-style-type: none"> • Continuously update Career Development programs in line with the latest/futuristic tech environment and business strategy <p>Talent Attraction/Retention</p> <ul style="list-style-type: none"> • Design and develop an appealing employer branding and Employee/Candidate Value Proposition to position SunTec as an equal opportunity provider.

Material Topic 5 - Employee Health, Safety and Wellbeing²¹

²⁰ GRI 403-6

²¹ GRI 403-6



Goals		<ul style="list-style-type: none"> Promote holistic well-being of all employees at SunTec
Short term (1-2 years)	Medium term (3-5 years)	Long term (6-10 years)
<ul style="list-style-type: none"> Conducting various programs and initiatives for holistic well-being of associates promoting mental, emotional, financial and physical wellbeing Set up engagement programs to inculcate a culture of fitness and physical wellness. Carryout periodic health checkups and counselling 	<ul style="list-style-type: none"> Establish frameworks for conducting programs and counseling sessions focusing on promoting mental and physical health and overall wellbeing. Provide recreational facilities for associates for enhancing physical and emotional health across SunTec Campuses 	<ul style="list-style-type: none"> Drive a culture of fitness and physical wellness with 100% coverage of employees on health monitoring

Material Topic 6 - Diversity, Equity and Inclusion



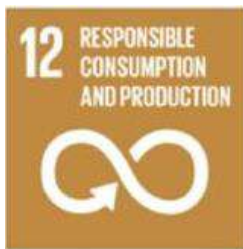
Goals		<ul style="list-style-type: none"> Position SunTec as an equal opportunity provider, promoting diversity, Equity and Inclusion
Short term (1-2 years)	Medium term (3-5 years)	Long term (6-10 years)
Sensitizing associates on DEI:	<ul style="list-style-type: none"> Maintain a diverse workforce including people 	<ul style="list-style-type: none"> Maintain a diverse workforce including people





<ul style="list-style-type: none"> • Carry out awareness programs on diversity and equal opportunity for employees • Carry out workshop for employees on Diversity, Equity and Inclusion <p>Ensuring DEI in the workplace:</p> <ul style="list-style-type: none"> • Maintain at least 30% women ratio in workforce • Ensure equal pay opportunities irrespective of demographics 	<p>of all genders, ethnicities, age-group and differently abled persons.</p> <ul style="list-style-type: none"> • Work towards achieving 25% women in leadership positions of the company 	<p>of all genders, ethnicities, age-group and differently abled persons.</p> <ul style="list-style-type: none"> • Maintain at least 25% women in the executive leadership of the company
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Material Topic 7 - Supply Chain Sustainability



<p>Goals</p>			<ul style="list-style-type: none"> • Integrate ESG-associated criteria into our vendor processes for achieving supply chain sustainability • Achieve a sustainable supply chain integrating ethical and environmentally responsible practices into a competitive and successful business model.
<p>Short term (1-2 years)</p>	<p>Medium term (3-5 years)</p>	<p>Long term (6-10 years)</p>	
<ul style="list-style-type: none"> • Review and update supplier code of conduct for sustainable practices. • Identify key vendor and supplier categories for sustainability practices • Develop and implement training module to create awareness about 	<ul style="list-style-type: none"> • Integrate sustainable supply chain management process into vendor processes • Launch a responsible supply chain assessment for top 10 suppliers and vendors 	<ul style="list-style-type: none"> • Report assessment of key suppliers and vendors on sustainability practices on a periodic basis • All vendors to be assessed for responsible supply chain practices by 2035 	





<p>sustainability to key vendors and supplier categories</p> <ul style="list-style-type: none"> Educate 100% employees (Procurement dept. And identified users) on sustainable supply chain practice 	<ul style="list-style-type: none"> Provide awareness sessions covering at least 50% of our critical suppliers Report assessment of key suppliers and vendors on sustainability practices 	
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Material Topic 8- Corporate Social Responsibility



<p>Goals</p>		<ul style="list-style-type: none"> Actively contribute back to the society for effective social change through our CSR activities. Through our CSR program help society in areas like Education and Health.
<p>Short term (1-2 years)</p>	<p>Medium term (3-5 years)</p>	<p>Long term (6-10 years)</p>
<ul style="list-style-type: none"> Continue to spearhead social commitment in education - programs for underprivileged children in government schools around our campus and expand it to remote areas as well Promote the dying art forms Awareness programs for inclusivity of Physically challenged people Campaign against drug usage Teaching Lifesaving skills like swimming to the children from underprivileged families. 	<ul style="list-style-type: none"> Continuing all the short-term goals. Expand the outreach to childcare homes by bringing out the best talents of the children who are the inmates there. Providing them with platforms to showcase their talents Encourage the tribal community in their livelihood programs. Support for children with special needs Support economically weaker section by sponsoring skill learning 	<ul style="list-style-type: none"> Continuing all the short term and midterm goals. Hospital and medical facility improvements in remote areas Set up medical camps for people in the campus locality Community-based water body clean up initiative





<ul style="list-style-type: none"> • ‘Daanotsav’ for supporting 100 families around campus with their basic monthly needs 	<p>programs that will help them in income generation</p>	
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Material Topic 9 – Ethical Business Model²²

Goals			<ul style="list-style-type: none"> • Promote, among other things, honest and ethical conduct at SunTec and to ensure to the greatest possible extent that SunTec’s business is conducted in a consistently legal and ethical manner.
Short term (1-2 years)	Medium term (3-5 years)	Long term (6-10 years)	
<ul style="list-style-type: none"> • Sensitization of associates on the ethical business conduct ▪ Clearly define, publish and educate all associates about the company’s business code of conduct • Training to contract staff on human rights and code of conduct 	<ul style="list-style-type: none"> • Sensitize and implement activities on ethical business conduct for employees and Tier 1 suppliers and vendors • Training to suppliers and vendors on human rights and code of conduct 	<ul style="list-style-type: none"> • Maintain the framework and periodically update, educate and monitor and track the ethical and sustainable business practices of the organization 	

Material Topic 10 - Business continuity and risks management



²² Material Topic 09





Goals		<ul style="list-style-type: none"> Integrate industry best practices in business continuity management into SunTec's business strategy
Short term (1-2 years)	Medium term (3-5 years)	Long term (6-10 years)
<ul style="list-style-type: none"> Improve Business continuity management process. Perform Business Impact Analysis and revamp Business Continuity Policy and Procedure and DR Policy and Procedure. Prepare to implement ISO 22301:2019 – Business continuity management in the medium term 	<ul style="list-style-type: none"> Implement ISO 22301:2019 – Business continuity management 	<ul style="list-style-type: none"> Maintain Compliance to ISO 22301:2019 - Business continuity management. Incremental Improvements to ISO 22301:2019 - Business continuity management.

Material Topic 11 - Data privacy and Data security



Goals		<ul style="list-style-type: none"> Ensure an internal monitoring system capable of meeting reasonable assurance requirements on all applicable regulations and standards Integrate industry best practices in Privacy information management standards at SunTec
Short term (1-2 years)	Medium term (3-5 years)	Long term (6-10 years)
<ul style="list-style-type: none"> Perform Data Privacy and GDPR Gap Analysis Perform Internal ISMS Assessments, mitigate action points, improve 	<ul style="list-style-type: none"> Get certified with accreditation ISO:27701 privacy information management standard 	<ul style="list-style-type: none"> Adopt leading data privacy standards across all global operations. Get recognized as one of industry's best performers in





Data Security controls and improve overall Security posture		information security and cloud practices
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Material Topic 12 - Women participation in Board



Short term (1-2 years)	Medium term (3-5 years)	Long term (6-10 years)
<ul style="list-style-type: none"> Maintain at least 25% women representation on the Board 	<ul style="list-style-type: none"> Maintain at least 25% women representation in the Board 	<ul style="list-style-type: none"> Maintain at least 25% women representation in the Board

6.4 External Sustainability Commitments

SunTec's ESG strategy is informed by internationally recognized sustainability principles and frameworks. Through its participation in global initiatives, the organization demonstrates its commitment to advancing responsible business conduct, climate stewardship, gender equality, human rights, and sustainable development.

Framework	Alignment Status
United Nations Sustainable Development Goals (SDGs)	Aligned
United Nations Global Compact (UNGC) Principles	Aligned
Global Reporting Initiative (GRI)	Referenced
Sustainability Accounting Standards Board (SASB)	Referenced
EcoVadis Sustainability Framework	Aligned
SME Climate Hub	Aligned
UN Women's Empowerment Principles	Aligned

These commitments support SunTec's contribution toward the United Nations Sustainable Development Goals and help guide long-term ESG priorities.



6.5 Our immediate ESG priorities

Based on the above set of ESG goals and commitments, our immediate ESG outlook is guided by a set of measurable and outcome-oriented strategic priorities aimed at strengthening governance maturity, improving operational sustainability, enhancing stakeholder trust, and building a more structured and data-driven ESG operating framework.

Our near-term focus is centred on improving measurable ESG performance across environmental stewardship, workforce sustainability, governance excellence, responsible technology management, and sustainable procurement practices.

6.5.1 Environmental Sustainability and Climate Action

Greenhouse Gas (GHG) Management

- Operationalize the newly established Scope 1, Scope 2, and key Scope 3 GHG baseline across business operations
- Target continued year-on-year reduction in travel-related emissions following the ~44% reduction achieved during the reporting period
- Expand emissions tracking coverage across:
 - Business travel
 - Employee commuting
 - Infrastructure operations
 - Supplier-related activities
- Improve environmental data accuracy, monitoring frequency, and reporting maturity across all major operational locations

Energy Efficiency and Sustainable Infrastructure

- Further optimize data centre and infrastructure operations to improve energy efficiency and reduce operational footprint
- Maintain operations from the IGBC Platinum-certified green building while improving overall resource efficiency
- Continue reducing power consumption and cooling requirements through infrastructure modernization initiatives
- Improve tracking of:
 - Electricity consumption (kWh)
 - Infrastructure efficiency indicators
 - Energy utilization trends

- Operational resource intensity metrics

Waste Management and Resource Efficiency

- Increase waste segregation and responsible disposal coverage across operational facilities
- Maintain 100% certified disposal of e-waste through authorized vendors
- Improve recycling rates and reduce landfill dependency across operational waste streams
- Continue reducing paper consumption through digital-first operational practices
- Strengthen monitoring of:
 - Total waste generated
 - Recycled waste percentage
 - E-waste disposal volumes
 - Water consumption and reuse metrics

Climate Governance and Environmental Reporting

- Strengthen environmental governance and ESG reporting maturity through more structured environmental metrics and disclosures
- Continue participation in the SME Climate Hub to strengthen climate action planning and emissions management capabilities
- Progressively align climate disclosures with evolving global ESG and sustainability reporting expectations

6.5.2 Social Responsibility and Workforce Sustainability

Diversity, Equity and Inclusion (DEI)

- Strengthen workforce diversity and gender inclusion initiatives aligned with Women's Empowerment Principles (WEPs)
- Improve representation across leadership and managerial levels over the medium term
- Continue monitoring:
 - Gender diversity ratios
 - Workforce participation metrics
 - Inclusion and engagement indicators
 - Leadership diversity metrics



Employee Wellbeing and Engagement

- Expand employee wellbeing initiatives covering physical, mental, and emotional wellbeing
- Continue strengthening employee engagement and workplace communication practices
- Improve organizational participation in:
 - Wellness initiatives
 - Engagement programs
 - Feedback mechanisms
 - Employee support initiatives

Learning and Development

- Sustain and improve the existing average employee learning benchmark of ~45 training hours per employee annually
- Expand technical, leadership, ESG, and future-skills learning initiatives
- Improve monitoring of:
 - Training participation rates
 - Learning hours per employee
 - Leadership development participation
 - Upskilling and certification metrics

Human Rights and Ethical Workplace Practices

- Continue strengthening the implementation of:
 - Human Rights Policy²³
 - DEI Policy²⁴
 - POSH framework
 - Ethical workplace governance practices
- Maintain zero tolerance towards workplace harassment, discrimination, forced labour, and unethical workplace conduct

²³ GRI 2-25

²⁴ GRI 2-25

- Continue strengthening grievance redressal and employee accountability mechanisms

Community Engagement and CSR

- Continue supporting CSR initiatives focused on:
 - Education
 - Healthcare
 - Social wellbeing
 - Community development
- Improve monitoring of:
 - CSR beneficiaries reached
 - Employee volunteering participation
 - Community engagement indicators
 - CSR program impact metrics

6.5.3 Governance, Ethics and Digital Trust

Governance and ESG Oversight

- Continue strengthening ESG Committee governance, oversight frequency, and organizational accountability mechanisms
- Enhance integration of ESG considerations into operational governance and strategic decision-making
- Expand governance monitoring and ESG performance review mechanisms across business functions

Ethics, Compliance and Responsible Conduct

- Continue reinforcing ethical business conduct and anti-corruption governance practices
- Maintain formal whistleblower governance and grievance redressal mechanisms
- Improve tracking of:
 - Ethics awareness participation
 - Compliance training coverage
 - Governance review activities
 - Policy adherence metrics

Data Privacy, Cybersecurity and Operational Resilience

- Continue strengthening governance aligned with:
 - ISO 27001
 - ISO 22301
 - Data privacy requirements
 - Operational resilience standards
- Maintain strong cybersecurity, business continuity, and information protection controls
- Improve monitoring of:
 - Security awareness coverage
 - Incident management readiness
 - Business continuity preparedness
 - Operational resilience indicators

Responsible Technology and AI Governance

- Strengthen governance around responsible technology usage and AI-related operational practices
- Enhance oversight relating to:
 - Ethical technology governance
 - Data governance
 - Digital trust
 - Responsible innovation practices

6.5.4 Sustainable Procurement and Responsible Supply Chain

Supplier ESG Governance

- Operationalize the Supplier Code of Conduct across procurement and supplier governance processes
- Expand ESG integration into supplier onboarding and evaluation frameworks
- Initiate risk-based ESG assessment coverage for critical and high-impact suppliers

Sustainable Procurement Integration

- Improve monitoring of:
 - ESG-linked supplier assessments

- Supplier engagement activities
- Sustainable procurement coverage
- Supplier governance maturity
- Strengthen supplier awareness relating to:
 - Ethical business conduct
 - Environmental responsibility
 - Information security
 - Compliance expectations

Long-Term Supply Chain Sustainability

- Progressively expand ESG assessment coverage across the supplier ecosystem
- Strengthen third-party governance and supplier risk visibility
- Build a more resilient, transparent, and sustainability-aligned supply chain framework over time

6.5.5 ESG Measurement, Reporting and Global Alignment

ESG Data and Performance Management

- Strengthen ESG data governance and reporting maturity across all ESG pillars
- Expand structured tracking of:
 - Environmental indicators
 - Workforce metrics
 - Governance indicators
 - Supplier sustainability metrics
- Improve data consistency, reporting transparency, and governance visibility

Reporting and Disclosure Maturity

- Continue enhancing ESG disclosures aligned with:
 - GRI
 - SASB
 - EcoVadis
 - UNGC principles

- Improve disclosure quality, comparability, and evidence-based reporting maturity

Global ESG Alignment

- Continue strengthening alignment with:
 - United Nations Global Compact (UNGC)
 - Women’s Empowerment Principles (WEPs)
 - Sustainable Development Goals (SDGs)
 - SME Climate Hub initiatives
 - Global ESG reporting and governance best practices.

We recognize that ESG is an ongoing journey that requires adaptability, innovation, and commitment. As expectations evolve, we remain focused on continuously refining its approach, strengthening its capabilities, and delivering measurable impact. The strategic outlook outlined above reflects our intent to build a resilient, responsible, and future-ready organization—one that creates value not only for its business, but also for society and the environment.



7. A Quick snapshot of progress since our last report

<i>2024 Commitment</i>	<i>Progress in the reporting period</i>
<i>Strengthen ESG governance and accountability</i>	Established ESG governance framework supported by policies, leadership oversight, and integration of ESG considerations into business decision-making.
<i>Formalize ESG policies and management systems</i>	Developed and implemented a comprehensive ESG policy framework covering environment, human rights, diversity and inclusion, ethics, procurement, information security, privacy, AI governance, and business continuity.
<i>Enhance employee well-being and inclusion</i>	Expanded employee engagement, wellness, learning and development, diversity and inclusion, employee recognition, and community participation initiatives.
<i>Strengthen environmental stewardship</i>	Continued responsible resource management, tree plantation initiatives, waste reduction practices, energy conservation efforts, and environmental awareness activities.
<i>Advance responsible procurement practices</i>	Implemented Sustainable Procurement Policy and Supplier Code of Conduct, strengthening supplier ESG expectations and responsible sourcing practices.
<i>Strengthen data privacy and information security</i>	Continued maintaining ISO 27001-certified information security management systems and strengthened privacy, cybersecurity, and digital trust practices.
<i>Expand stakeholder engagement and ESG awareness</i>	Increased employee participation in ESG initiatives, awareness campaigns, volunteer programs, and sustainability-focused communications.
<i>Improve ESG transparency and reporting</i>	Enhanced ESG disclosures through a more comprehensive ESG reporting framework aligned with stakeholder expectations and sustainability best practices.
<i>Establish responsible AI governance</i>	Introduced AI Usage and Governance Policy supporting ethical, transparent, secure, and responsible deployment of artificial intelligence technologies.
<i>Build foundations for future ESG maturity</i>	Established governance structures, policies, processes, and programs that support long-term ESG integration and continuous improvement.



8. SNEHA – Nurturing Community Engagement and Social Impact²⁵

8.1 About SNEHA



At SunTec, we believe that sustainable growth extends beyond business success and includes creating meaningful value for the communities around us. Guided by this philosophy, SNEHA (Sustainable Nurturing through Education and Health Activities) serves as our platform for community engagement, social impact, and employee volunteering.

Through SNEHA, we strive to create positive and lasting change by supporting initiatives in education, healthcare, community welfare, environmental stewardship, and social inclusion. Our approach focuses on addressing local community needs while encouraging employees to actively participate in building a more equitable and sustainable society.

Over the years, SNEHA has evolved into a key pillar of SunTec's social responsibility efforts, bringing together employees, community organizations, educational institutions, healthcare providers, and local stakeholders to drive meaningful impact. The program reflects our belief that businesses have an important role to play in strengthening communities and improving quality of life.

Our initiatives are aligned with several United Nations Sustainable Development Goals (SDGs), particularly those relating to quality education, good health and well-being, reduced inequalities, sustainable communities, and partnerships for development.

As part of its immediate ESG outlook, we aim to further institutionalize and expand SNEHA as a measurable and impact-oriented social engagement platform aligned with broader ESG objectives and Sustainable Development Goals (SDGs).

8.2 Education and Child Development

Education continues to be one of the primary focus areas of SNEHA. We believe that access to quality education creates opportunities, empowers communities, and contributes to long-term social development.

Over the years, we have supported government schools, childcare institutions, and underserved communities through infrastructure development, learning resources, digital enablement initiatives, and student support programs. Our efforts have included establishing computer laboratories, improving classroom infrastructure, supporting libraries, distributing educational materials, and enhancing learning environments for students.

²⁵ 413-1 Operations with local community

During the reporting period, SNEHA continued its engagement with schools and child welfare institutions through various initiatives aimed at improving access to educational resources and creating better learning experiences. Employee volunteers actively participated in school outreach activities, educational support programs, and community engagement initiatives.



A notable initiative during the year was the School Kit and T-Shirt Distribution Drive, through which educational materials were distributed to students, helping create a more supportive and encouraging learning environment. We also continued our engagement with childcare homes and vulnerable children through outreach programs, festive celebrations, and donation initiatives.

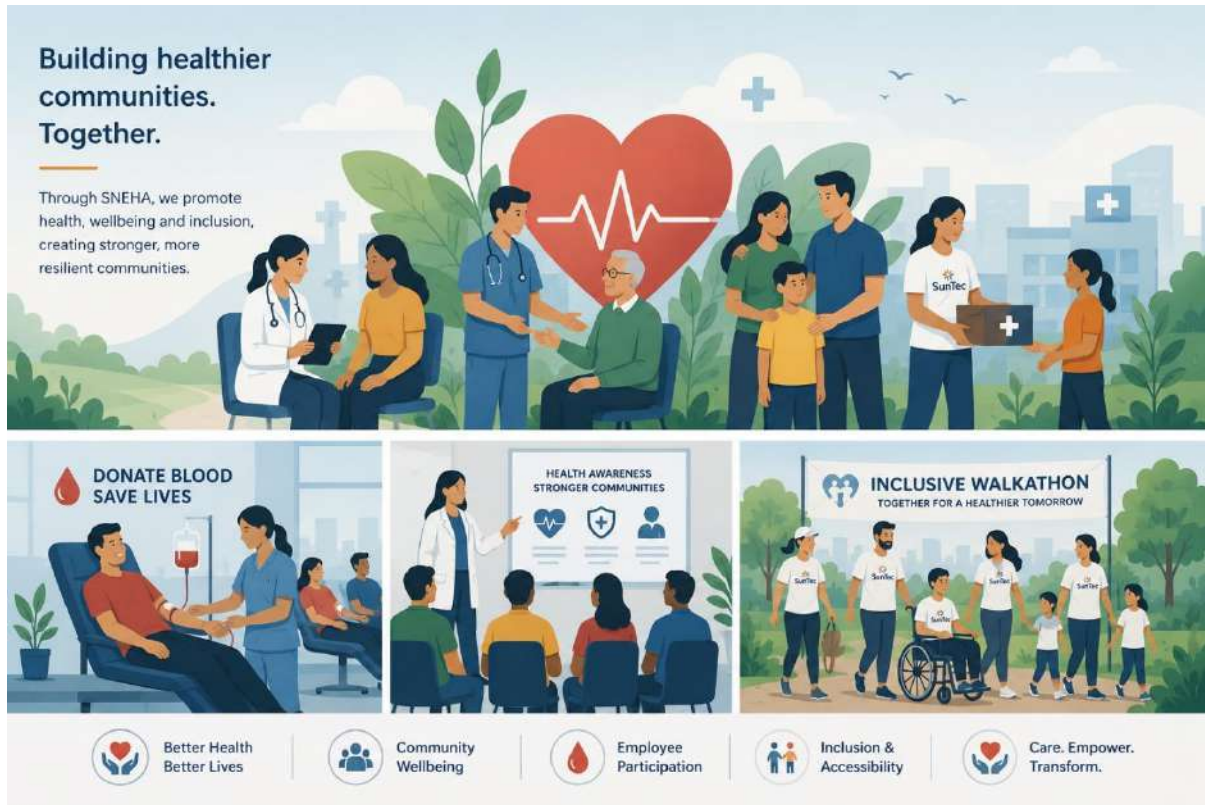
Through these efforts, we remain committed to supporting educational development and creating opportunities for children from underserved communities to learn, grow, and realize their potential.

Key Initiatives

- School infrastructure and development support
- Computer laboratory and digital learning initiatives
- School kit and educational material distribution
- Childcare home outreach programs

- Support for vulnerable and underserved children
- Employee volunteering in education-focused activities

8.3 Health and Wellbeing²⁶



Improving community health and wellbeing remains a key focus area of SNEHA. We believe that access to healthcare and health awareness are fundamental to creating stronger and more resilient communities.

During the year, we continued to support healthcare-focused initiatives aimed at improving access to care, promoting health awareness, and encouraging community participation. Our initiatives ranged from healthcare support programs and awareness activities to employee-led blood donation campaigns and wellness-focused community engagement efforts.

One of the most inspiring examples of employee participation was the blood donation initiative, where employees voluntarily came together to support healthcare needs and contribute towards saving lives. Such initiatives reflect the spirit of compassion and social responsibility that drives our people.

We also supported programs focused on community wellbeing, inclusion, and social participation. The Inclusive Walkathon organized during the year brought together employees,

²⁶ Health and well-being

community members, and partner organizations in support of inclusivity, accessibility, and equal opportunities for all.

Through these initiatives, SNEHA continues to promote a culture of care, wellbeing, and collective responsibility.

Key Initiatives

- Blood donation campaigns
- Healthcare support and awareness programs
- Inclusive Walkathon
- Community wellbeing initiatives
- Employee participation in health-focused volunteering activities

We will continue strengthening healthcare-focused CSR initiatives and community wellbeing programs under the SNEHA platform and aim to expand medical outreach initiatives, preventive health programs, healthcare awareness campaigns, and support for underserved communities through structured health and wellness initiatives.

Key areas of focus include:

- Medical camps and preventive healthcare programs
- Blood donation drives with employee participation
- Community health awareness initiatives
- Support for healthcare access in underserved communities
- Partnerships with healthcare institutions and NGOs

We also intend to strengthen employee participation in community health and wellbeing initiatives while progressively improving the measurement and visibility of healthcare-related social impact programs.

8.4 Community Care and Social Inclusion

At the heart of SNEHA is a commitment to supporting communities during both everyday challenges and times of crisis. Our community engagement efforts focus on creating meaningful impact through inclusion, outreach, and support for vulnerable groups.

During the reporting period, employees demonstrated remarkable generosity and solidarity through several community-focused initiatives. Following the devastating landslides in Wayanad, employees and the organization came together to support relief and rehabilitation efforts. Contributions were mobilized through fundraising campaigns and community support initiatives, helping affected families during a difficult period.

SNEHA also continued to support childcare homes, social welfare institutions, and vulnerable communities through donation drives, festive celebrations, and employee volunteering activities. The Wish Tree initiative once again enabled employees to fulfill wishes and provide essential items for children and individuals from underprivileged backgrounds, creating memorable experiences and meaningful impact.



Support staff welfare also remained an important focus area. Scholarship programs, Onam kits, vouchers, and welfare initiatives were extended to support staff and their families, reflecting our commitment to inclusion and shared prosperity across the broader SunTec community.

Through these initiatives, we continue to foster a culture of empathy, inclusion, and community partnership.

Key Initiatives

- Wayanad relief and rehabilitation support
- Wish Tree community giving initiative
- Support for childcare homes and welfare institutions
- Scholarship awards for support staff
- Onam kits and welfare support programs
- Employee-led fundraising and donation campaigns

8.5 Environmental Stewardship

Environmental responsibility is not limited to organizational operations; it also requires active participation and awareness among employees and communities. Through SNEHA, we continue to encourage environmental stewardship through awareness campaigns, volunteer-driven initiatives, and community participation programs.



Throughout the reporting period, employees actively participated in several environmental awareness and conservation initiatives. World Environment Day celebrations, Earth Hour campaigns, International Day of Forests activities, and World Water Day awareness programs helped promote responsible environmental practices and encourage sustainable behaviours.

A key highlight was the beach clean-up initiatives organized as part of environmental volunteering efforts. Employees came together to help restore coastal areas, reduce litter, and promote awareness about marine conservation and responsible waste management. Similar environmental action was undertaken during Kerala Piravi celebrations, combining community engagement with environmental responsibility.

We also conducted an e-Waste Collection Drive to encourage responsible disposal and recycling of electronic waste. These initiatives contributed to reducing environmental impact while increasing awareness about sustainable consumption and waste management practices.

Through environmental volunteering and awareness programs, SNEHA continues to inspire employees to become active participants in environmental conservation and sustainability efforts.

Key Initiatives

- World Environment Day campaigns
- Earth Hour participation
- International Day of Forests awareness initiatives
- World Water Day awareness and conservation campaigns
- Beach clean-up activities
- Kerala Piravi environmental volunteering initiatives
- e-Waste collection and recycling drive
- Employee-led environmental awareness programs

8.6 Inclusion, Social Equity and Community Development

Employee participation remains the driving force behind the success of SNEHA. Across all initiatives, employees consistently demonstrate a strong commitment to giving back to society through volunteering, fundraising, awareness campaigns, and community engagement.

During the reporting period, employees actively supported education initiatives, healthcare programs, environmental campaigns, disaster relief efforts, blood donation drives, community outreach activities, and welfare programs. Initiatives such as 51 Acts of Kindness showcased the collective impact that can be achieved when individuals come together with a shared purpose of creating positive change.

The continued success of programs such as Wish Tree, blood donation campaigns, school outreach activities, environmental volunteering events, and Wayanad relief efforts reflects the generosity, compassion, and community spirit of our workforce.

We remain committed to fostering a culture where volunteering and social responsibility are integral parts of the employee experience and where every individual has the opportunity to contribute towards building stronger communities and a more sustainable future.

Employee Engagement Highlights

- 51 Acts of Kindness campaign
- Employee fundraising and contribution initiatives
- Blood donation participation
- School and childcare outreach programs

- Environmental volunteering activities
- Disaster relief support initiatives
- Community engagement and awareness campaigns

8.7 Strengthening CSR Governance and Impact Measurement

As part of its ESG maturity journey, SunTec also aims to strengthen the governance, reporting, and impact measurement capabilities of SNEHA-led initiatives. The organization intends to improve monitoring and reporting across areas such as:

- CSR beneficiaries reached
- Employee volunteering participation
- Volunteer hours contributed
- Education and healthcare outreach indicators
- Environmental awareness participation
- Community engagement impact metrics

SunTec will continue strengthening collaboration with grassroots NGOs, healthcare institutions, educational organizations, and local communities to improve the scale, effectiveness, and sustainability of CSR initiatives.

8.8 Long-Term SNEHA Outlook

Going forward, we aim to progressively expand the scale, reach, governance maturity, and measurable impact of SNEHA initiatives as part of its broader ESG and stakeholder engagement strategy. We intend to deepen community partnerships, strengthen employee participation, improve impact visibility, and align social initiatives more closely with long-term societal development priorities.

Through SNEHA, we remain committed to creating sustainable and meaningful social impact while reinforcing its broader vision of building a responsible, compassionate, inclusive, and future-ready organization that contributes positively to society beyond its business operations.

9. Our Approach to Materiality^{27 28}

9.1 Defining Materiality at SunTec

At SunTec Business Solutions, materiality forms the cornerstone of its ESG strategy, guiding how we identify, prioritize, and manage the environmental, social, and governance issues that are most critical to its long-term success and stakeholder expectations. Rather than being a static exercise, materiality is treated as a dynamic and continuous process that informs decision-making across strategy, operations, risk management, and reporting.

We define material ESG topics as those that have a meaningful influence on business performance, operational resilience, and strategic direction, while also shaping stakeholder perceptions, expectations, and trust. These topics represent areas where our activities have the most significant impact, as well as where external risks and opportunities are most likely to affect value creation over time.

The materiality assessment framework is designed to capture both internal and external perspectives, integrating inputs from leadership, employees, clients, and evolving regulatory and market expectations. This enables us to focus its efforts on the issues that matter most, ensuring that resources, governance oversight, and performance tracking are aligned with priority ESG areas.

Recognizing that the business and sustainability landscape is constantly evolving, we periodically review and refine its material topics to remain responsive to emerging risks, stakeholder priorities, and global sustainability trends. This ongoing refinement ensures that our ESG approach remains relevant, forward-looking, and closely aligned with its overall business strategy.

9.2 Materiality Assessment Framework

For this reporting period, we followed a structured, multi-step approach to materiality assessment, aligned with globally recognized frameworks such as the **Global Reporting Initiative (GRI)** and industry best practices.

The assessment process comprised four key stages:

1. Identification of ESG Topics

A comprehensive list of ESG topics is identified through:

- Review of global ESG standards (GRI, SASB)
- Analysis of peer and industry practices

²⁷ GRI 2-29

²⁸ GRI 3-1, 3-2, 3,3

- Internal policy and risk frameworks
- Emerging global sustainability trends

These topics span across environmental, social, and governance domains, including climate change, energy management, employee wellbeing, diversity and inclusion, data privacy, and ethical business conduct.

2. Stakeholder Engagement

We engaged with key stakeholder groups to understand their expectations and perspectives on ESG priorities.

Stakeholder groups included:

- Employees
- Customers
- Business partners and suppliers
- Leadership and internal stakeholders

Inputs were gathered through structured interactions, internal consultations, and feedback mechanisms. These insights helped assess the perceived importance of ESG topics from a stakeholder perspective.

3. Impact and Risk Evaluation

Each identified topic was evaluated based on:

- Its potential impact on SunTec's operations and strategic objectives
- Associated risks and opportunities
- Relevance to regulatory and compliance requirements
- Alignment with organizational values and long-term priorities

This evaluation ensured that material topics reflected both external expectations and internal business considerations.

4. Prioritization and Validation

Based on stakeholder inputs and internal assessments, ESG topics were prioritized to identify those that are most material to the organization.

The prioritization was validated through:

- Leadership and ESG Committee review
- Alignment with organizational strategy
- Consistency with global frameworks

This structured validation process ensured that material topics are credible, relevant, and actionable.

5. Materiality Matrix

The outcome of the materiality assessment was represented through a materiality matrix, which maps ESG topics based on:

- Importance to stakeholders
- Impact on business

Topics that ranked high on both dimensions were identified as **priority material topics**, forming the focus areas for SunTec's ESG strategy and reporting.

6. Key Material ESG Topics

Based on the assessment, we identified the following key material topics:

Environmental

- Energy management and efficiency
- Greenhouse gas emissions and climate impact
- Water consumption and conservation
- Waste management and resource optimization

Social

- Employee wellbeing and engagement
- Diversity, equity, and inclusion
- Learning and development
- Human rights and fair labor practices
- Community engagement

Governance

- Business ethics and integrity
- Data privacy and information security
- Regulatory compliance
- Risk management
- Responsible procurement and supplier practices

7. Integration with ESG Strategy

Material ESG topics were directly integrated into SunTec's sustainability strategy, guiding:

- Policy development
- Operational initiatives
- Performance metrics and KPIs
- Reporting and disclosures

Each material topic was linked to specific actions and measurable outcomes, ensuring that the organization's ESG efforts are focused and impactful.

8. Continuous Review and Improvement

We adopted a dynamic approach to materiality, recognizing that ESG priorities evolve over time.

We will periodically review its materiality framework to:

- Incorporate emerging ESG risks and opportunities
- Reflect changes in stakeholder expectations
- Align with evolving regulatory and industry standards

The ESG Committee played a key role in overseeing this process, ensuring that material topics remain relevant and aligned with the organization's strategic direction.

10. Corporate Governance

10.1 Governance Philosophy²⁹

At SunTec, governance is the foundation that enables sustainable growth, innovation, customer trust, and long-term value creation. We believe that strong governance extends beyond regulatory compliance and encompasses ethical conduct, accountability, transparency, responsible decision-making, and proactive risk management.

SunTec operates under a governance framework led by its Board of Directors and Managing Director, who collectively provide strategic direction, oversight, accountability, and stewardship of the organization's long-term growth and sustainability objectives. The Board periodically reviews business performance, strategic initiatives, operational priorities, key risks, compliance obligations, stakeholder expectations, and emerging environmental, social, and governance (ESG) matters relevant to the organization.

The Managing Director is responsible for the overall execution of the organization's strategy and serves as the highest executive authority for operational decision-making, risk management, stakeholder engagement, and conflict resolution. The Managing Director works closely with the leadership team to ensure that governance principles, business objectives, regulatory requirements, and sustainability considerations are effectively integrated into day-to-day operations.

Responsibility for managing specific business, operational, environmental, social, governance, information security, privacy, talent, quality, and business continuity matters is delegated to designated functional leaders, management teams, and internal committees. These teams are responsible for implementing policies, monitoring performance, managing risks, addressing stakeholder concerns, and reporting progress through established governance and management review mechanisms. Significant operational, compliance, ethical, reputational, people-related, cybersecurity, and sustainability matters are escalated through the management structure for review and resolution. Material issues, risks, strategic decisions, and matters with potential business impact are reported to and reviewed by the Managing Director and, where appropriate, the Board of Directors as part of the organization's governance and oversight processes. Through periodic management reviews, leadership discussions, internal audits, compliance assessments, and Board-level oversight, SunTec seeks to maintain effective governance, accountability, transparency, and responsible decision-making across its operations and stakeholder relationships.

²⁹ GRI 2-9, 2-10, 2-11, 2-12, 2-13, 2-17, 2-18

The Board possesses collective knowledge and experience across business, technology, finance, governance, risk, and sustainability matters, enabling effective oversight of the Company's operations and long-term strategy. Board effectiveness is periodically reviewed through governance reviews, management interactions, and assessment of strategic and operational outcomes to support continual improvement in governance practices.

Our governance framework integrates Environmental, Social and Governance (ESG) considerations into strategic planning, operational execution, risk management, and stakeholder engagement. Through clear policies, defined responsibilities, and oversight mechanisms, we strive to ensure that sustainability principles are embedded across our business operations.

10.2 Governance Structure and Board Oversight

The ESG Board Committee provides strategic oversight of the organization and is responsible for:

- Long-term strategy and value creation
- ESG oversight and sustainability governance
- Risk management and business continuity
- Ethical business conduct
- Regulatory compliance
- Data privacy and cybersecurity oversight
- Stakeholder accountability

The Board regularly reviews organizational performance, strategic priorities, emerging risks, and ESG-related matters.

Board Diversity

We remain committed to fostering diverse perspectives at the highest levels of governance.

Key highlights:

- 25% women representation on the Board
- Diverse professional expertise across technology, business leadership, finance, and governance
- Commitment to inclusive leadership and balanced decision-making

The Board considers diversity of gender, experience, skills, and background when evaluating future leadership appointments.

10.3 ESG Governance Framework³⁰

Recognizing ESG as a strategic business priority, we have established an ESG governance framework that enables oversight, accountability, and continuous improvement. The ESG governance is driven by the ESG Committee whose responsibility has been listed below.

ESG Committee

The ESG Committee is responsible for:

- Reviewing ESG strategy and objectives
- Monitoring progress against ESG commitments
- Reviewing emerging ESG risks and opportunities
- Recommending sustainability initiatives
- Monitoring ESG disclosures and reporting

The committee regularly evaluates topics including:

Environmental

- Energy management
- Climate change
- Greenhouse gas emissions
- Resource efficiency
- Waste management

Social

- Employee wellbeing
- Diversity, Equity and Inclusion
- Human rights
- Community engagement
- Talent development

Governance

- Ethics and compliance
- Data privacy

³⁰ GRI 2-14

- Cybersecurity
- Risk management
- Regulatory compliance

This governance structure ensures that ESG considerations are integrated into business planning and operational decision-making.

10.4 Ethics, Integrity and Responsible Conduct

Integrity remains central to SunTec's culture.

We maintain a zero-tolerance approach towards:

- Bribery
- Corruption
- Fraud
- Conflicts of interest
- Unethical business practices

Employees, contractors, suppliers, and business partners are expected to uphold the standards outlined in our:

- Code of Conduct Policy³¹
- Human Rights Policy
- Applicable Laws Policy³²
- Supplier Code of Conduct
- ESG Policy

Highlights of the reporting period

- Zero confirmed incidents of corruption
- Zero anti-competitive conduct violations
- Zero regulatory penalties related to unethical business conduct

10.5 Whistleblower and Speak-Up Culture³³

We encourage employees and stakeholders to raise concerns without fear of retaliation.

The Whistleblower Framework enables reporting of:³⁴

- Fraud
- Ethical misconduct
- Harassment

³¹ GRI 2-25

³² GRI 2-27

³³ GRI 2-16

³⁴ GRI 2-25



- Discrimination
- Policy violations
- Conflicts of interest
- Regulatory non-compliance

All concerns are investigated confidentially and objectively.

We prohibit retaliation against individuals who raise concerns in good faith and promotes a culture of transparency and accountability.

Reporting Period Metrics

	<i>Metric</i>	<i>Number of cases during the reporting period</i>
	<i>Cases reported</i>	0
	<i>Cases resolved</i>	Not Applicable
	<i>Resolution rate</i>	Not Applicable
	<i>Retaliation incidents</i>	Not Applicable

10.6 Risk Management and Business Continuity³⁵

We operate a structured enterprise risk management framework designed to identify, assess, monitor, and mitigate risks across the organization.

Key risk areas include:

- Cybersecurity threats
- Data privacy risks
- Business continuity disruptions
- Regulatory changes
- Climate-related risks
- Talent-related risks
- Third-party risks

³⁵ GRI 403-2



The Risk Management Committee periodically reviews risk exposure and mitigation effectiveness.

Our Business Continuity Management Policy supports organizational resilience through:

- Business Impact Analysis (BIA)
- Disaster Recovery Planning
- Crisis Response Procedures
- Regular testing and simulations

The framework is aligned with our roadmap toward ISO 22301 Business Continuity Management.

10.7 Data Privacy, Cybersecurity and Digital Trust³⁶

As a technology company serving global financial institutions, protecting information assets is fundamental to maintaining trust.

We maintain a comprehensive information security and privacy framework supported by:

Certifications

- ISO 27001 Information Security Management System certification

Policies

- Information Security Policy
- Cyber Security Policy
- Data Protection and Privacy Policy
- Privacy by Design Policy
- Breach Notification Policy
- Application Security Policy
- Access Management Policies
- SaaS Security Policies

Governance Controls

- Periodic security assessments
- Vulnerability management

³⁶ GRI 418-1

- Access reviews
- Incident response management
- Employee awareness training

Reporting Period Highlights

- Zero material data breaches
- Continued ISO 27001 compliance
- Ongoing privacy and cybersecurity awareness programs

10.8 Policy Framework

We maintain a comprehensive governance ecosystem supported by more than 50 documented policies covering:

Ethics and Compliance

- Code of Conduct
- Human Rights
- Applicable Laws
- Whistleblower mechanisms

Information Security and Privacy

- Information Security
- Data Protection and Privacy
- Cyber Security
- Application Security
- Business Continuity

People and Workplace

- Talent Policy
- Diversity, Equity and Inclusion
- Occupational Health and Safety
- Prevention of Sexual Harassment

Sustainability

- ESG Policy



- Environment Policy
- CSR Policy
- Sustainable Procurement Policy
- Supplier Code of Conduct

The policy framework is reviewed periodically to ensure alignment with evolving business, regulatory, and stakeholder expectations.

Our comprehensive list of policies and procedures

<i>Policy</i>	<i>ESG Area</i>	<i>Purpose</i>
<i>Code of Conduct Policy</i>	Ethics	Defines expected standards of ethical behaviour, integrity, accountability, and compliance across all business activities.
<i>Human Rights Policy</i>	Labour and Human Rights	Affirms SunTec's commitment to respecting internationally recognized human rights and preventing discrimination, child labour, and forced labour.
<i>Diversity, Equity and Inclusion Policy</i>	Labour and Human Rights	Promotes an inclusive workplace that values diversity, equal opportunity, and fair treatment for all employees.
<i>Occupational Health and Safety Policy</i>	Labour and Human Rights	Establishes principles and responsibilities for maintaining a safe, healthy, and secure work environment.
<i>Prevention of Sexual Harassment Policy</i>	Labour and Human Rights	Provides mechanisms to prevent, report, and address workplace harassment and ensure a respectful workplace.
<i>Talent Policy</i>	Labour and Human Rights	Governs recruitment, development, performance management, employee welfare, and career growth.
<i>CSR Policy</i>	Social Responsibility	Guides SunTec's community investments and social impact initiatives under its SNEHA programme.
<i>Environment Policy</i>	Environment	Establishes commitments related to resource efficiency, waste reduction, pollution prevention, and environmental stewardship.
<i>ESG Policy</i>	Governance	Provides the overarching framework for integrating ESG principles into business operations and decision-making.
<i>Supplier Code of Conduct</i>	Sustainable Procurement	Defines ethical, social, environmental, and compliance expectations for suppliers and business partners.
<i>Sustainable Procurement Policy</i>	Sustainable Procurement	Integrates ESG considerations into procurement decisions and supplier management practices.





<i>Business Continuity Management Policy</i>	Governance	Ensures resilience of critical operations during disruptions and emergency situations.
<i>Information Security Policy</i>	Governance	Establishes controls to safeguard the confidentiality, integrity, and availability of information assets.
<i>Cyber Security Policy</i>	Governance	Defines measures to protect systems, networks, and data from cyber threats and security incidents.
<i>Data Protection and Privacy Policy</i>	Governance	Governs the responsible collection, use, storage, and protection of personal and sensitive information.
<i>Privacy by Design Policy</i>	Governance	Embeds privacy considerations into business processes, products, and technology solutions from inception.
<i>Breach Notification Policy</i>	Governance	Defines procedures for identifying, escalating, investigating, and reporting security or privacy incidents.
<i>Artificial Intelligence Usage Policy</i>	Governance	Provides principles for the responsible, secure, and ethical use of artificial intelligence technologies.
<i>Applicable Laws Policy</i>	Governance	Ensures compliance with applicable legal and regulatory requirements across all jurisdictions of operation.
<i>Social media</i>	Governance	Guides responsible employee engagement on digital and social media platforms while protecting company reputation.
<i>Quality Policy</i>	Governance	Drives continual improvement, customer satisfaction, and operational excellence through structured quality management practices.

We maintain a comprehensive policy framework that supports responsible business conduct, regulatory compliance, risk management, employee wellbeing, environmental stewardship, sustainable procurement, data protection, and ethical governance. During the reporting period, the policy ecosystem was further strengthened through the introduction of ESG-focused policies covering sustainability, supplier responsibility, human rights, cybersecurity, privacy, and responsible AI. The framework currently comprises more than 50 active policies and is periodically reviewed to ensure alignment with evolving business requirements, stakeholder expectations, and global best practices. These policies are published in our internal organization portal, making it accessible for our all associates across the world.

10.9 Responsible AI Governance

As artificial intelligence becomes increasingly embedded in business processes and products, we are committed to the responsible, ethical, and secure use of AI.

During the reporting period, SunTec strengthened its governance framework through the introduction of the:





- Artificial Intelligence Usage Policy

The policy promotes:

- Responsible AI adoption
- Human oversight
- Data privacy protection
- Transparency and accountability
- Ethical use of AI technologies
- Compliance with applicable regulations

This reflects SunTec's commitment to balancing innovation with responsible governance.

10.10 Governance Performance Snapshot

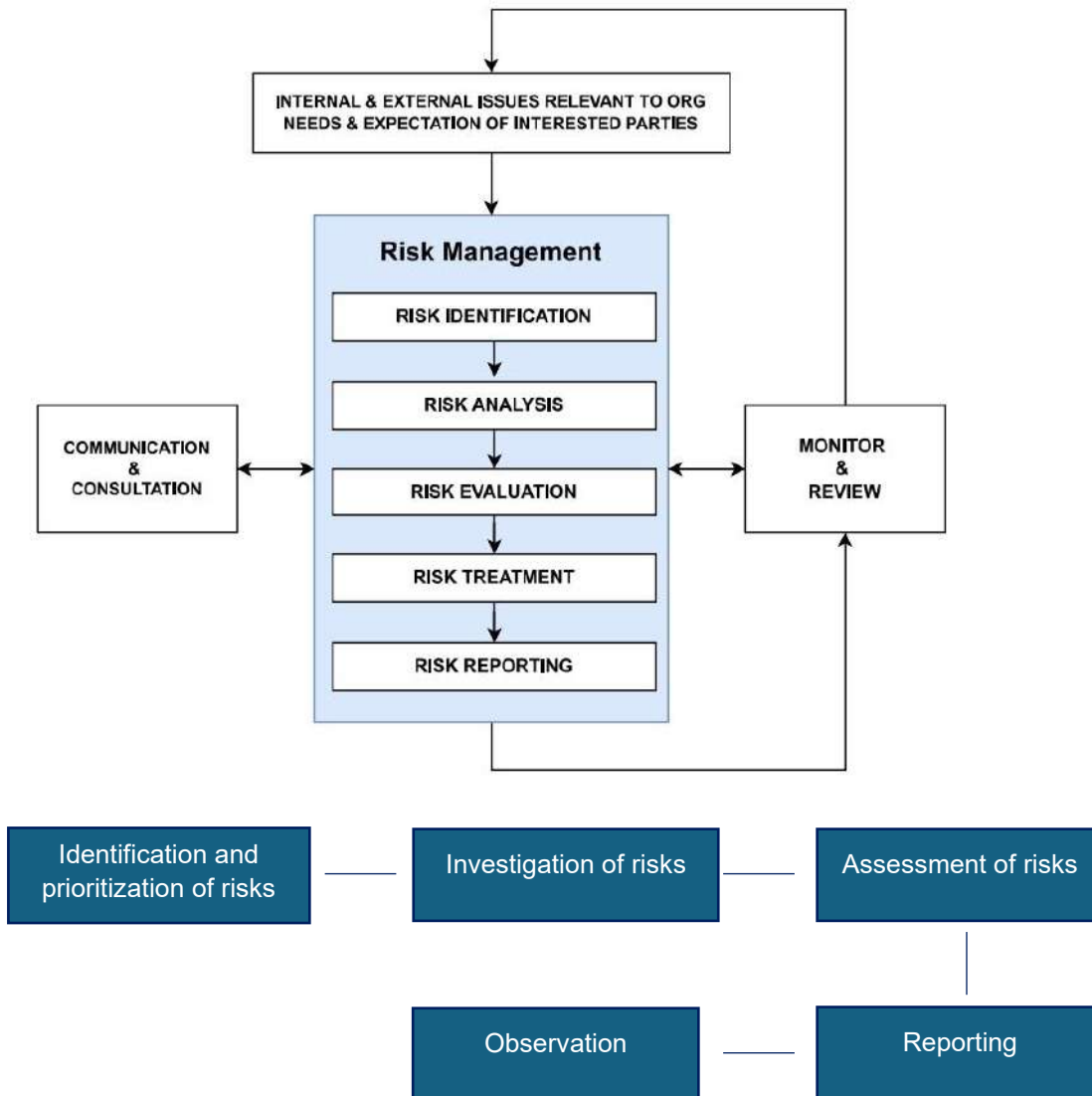
<i>Indicator</i>	<i>Reporting Period Status</i>
<i>Women on Board</i>	25%
<i>ISO 27001 Certification</i>	Maintained
<i>Confirmed Corruption Cases</i>	0
<i>Confirmed Data Breaches</i>	0
<i>ESG Policy</i>	Active
<i>Human Rights Policy</i>	Active
<i>DEI Policy</i>	Active
<i>Supplier Code of Conduct</i>	Active
<i>AI Usage Policy</i>	Active
<i>Whistleblower Framework</i>	Active

10.11 Risk management

At SunTec, we believe that risk governance is an essential aspect of corporate governance. It helps us acknowledge and handle risks within the agreed-upon risk tolerance and establishes a framework of responsibility across the organization, while ensuring that everyone is aware of their own obligations and accountability. Risk assessment is proactively conducted to identify risks for all the new, existing and modified processes and products. Measures are implemented to



minimize or manage impacts and to monitor them in a structured manner. Risks are identified on a yearly basis or at the beginning of a new process or product development. Our risk management framework is a structured process consisting of 5 steps as illustrated below.



The key risks and its effect on our business identified in relation to economic, environmental, and social factors are

No.	Key Risks	Effect of risk
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1	Foreign exchange risk	Sluggish economy causes currency to fluctuate and since our business is global, our revenue is exposed to fluctuations in exchange rates.
2	Cyber-attack and hacking risk	Due to the complex and expanding network of services we offer to our clients and the spread of our operations globally, there is a possibility that our business may be affected by disruptions in our environment. These disruptions could impact the availability or continuity of our operations.
3	IP and data leakage	Remote work has expanded the attack surface for companies, making them more susceptible to cyber threats.
4	Governance and compliance in new geographies	Business expansion into unknown jurisdictions can increase the risk of regulatory non-compliance.
5	Non-discrimination	Discrimination can result in various issues, such as decreased productivity and low morale. Therefore, we have implemented a non-discrimination policy that applies to all our operations.

We recognize the importance of health, safety, and environmental standards in our operations. All suppliers working at SunTec facilities must comply with SunTec's Health, Safety, and Environmental (HSE) requirements.

At SunTec, we have made the working conditions an inclusive and enabling environment and our employees given due attention to their needs. The working hours of SunTec are as per the applicable local laws. The Grievance Handling and Redressal Mechanism is designed to encourage fair, efficient, and equitable solutions for problems arising out of employment relationships. The grievances of the employees are settled in shortest possible time and at lowest possible level of authority to always enable the working conditions fair. We do not have any operations or suppliers that are at significant risk of child labor/ forced labour/ discrimination.

By extending our ethical practices beyond our organization, we guarantee the utmost fairness and integrity in our dealings with vendors. We have included ESG requirements in our procurement policy which cover human rights, labour, and environment. During the engagement, we consistently inform our suppliers about our evolving ESG agenda and goals. Our procurement policy clearly outlines our expectations for all supply chain partners. The policy also offers guidance on reporting any challenges and explains the expectations for various aspects of ESG.

10.12 Prohibition of child labour

While child labour and forced labour are not relevant to our industry, we still adhere to the regulations applicable in the U.K., where we operate. Failure to meet these obligations may result in disqualification for future work with SunTec. In our master service we have clause that which ensures no employment of child labour/ forced labour; hence risk of child labour/ forced



labour is removed. Further we intend to develop ESG metrics for our vendor evaluation process as part of onboarding and continuous screening.

We are committed not to hire or engage children below 18 years in any of our establishments or locations and for that we perform checks to verify the eligibility of our employees, which prevents the risks of employing child labour/ forced labour. This includes verifying their age and address. Additionally, we have established a team of HR heads to conduct human rights reviews and impact assessments at all our locations. Also, we conduct due diligence on our suppliers to identify and address child labour risk which includes reviewing the supplier's child labour policies and procedures.

10.13 Compliance with laws and regulations

At SunTec, we prioritize regulatory compliance. We have a strong commitment to respecting the laws and regulations in every country where we operate. We take all necessary steps to ensure that we comply with the required standards of disclosure and reporting. We are dedicated to upholding and respecting human rights. We also take different measures like providing them with training related to human rights.

All our employees have access to a complaint mechanism. This allows them to lodge complaints regarding various concerns. We hereby declare and undertake that all the companies have complied with all the applicable provisions under various acts in the respective jurisdictions. All the companies have consultants at respective regions for intimating us in advance on applicable compliances. We are also placing quarterly Global Compliance report in the meeting of our Board of directors of the apex company – SunTec Business Solutions Singapore Pte Ltd. We also have anonymous and independent reporting systems in place. This allows employees to report violations of human rights whistleblower grievances at whistleb@suntecgroup.com. Under the reporting system, the disciplinary actions are initiated as necessary, and assistance from regulatory authorities is sought when needed.

11. Environment – In detail

11.1 Our Environmental Commitment

At SunTec, environmental responsibility is an integral part of our commitment to sustainable value creation. We recognize that businesses have a vital role to play in addressing global environmental challenges, including climate change, resource scarcity, biodiversity loss, and waste generation. While our operations as a technology solutions provider have a comparatively lower direct environmental footprint than many manufacturing-intensive industries, we acknowledge our responsibility to continuously improve our environmental performance and contribute positively to a more sustainable future.

Our approach to environmental stewardship is guided by the principles of responsible resource utilization, operational efficiency, environmental compliance, and continuous improvement. Through our Environmental Policy, ESG Policy, Sustainable Procurement Policy, and broader ESG governance framework, we seek to integrate environmental considerations into business planning, infrastructure development, procurement decisions, and day-to-day operations.

We remain committed to reducing our environmental footprint while creating long-term value for our stakeholders. Our environmental priorities focus on energy efficiency, climate action, water conservation, responsible waste management, biodiversity enhancement, and environmental awareness. These priorities are supported by clear targets outlined in our ESG roadmap and aligned with our long-term ambition of achieving carbon neutrality by 2050.

11.2 Our performance on environmental factors³⁷



11.3 Environmental Governance

Environmental stewardship at SunTec is driven through a structured governance framework that provides oversight, accountability, and strategic direction. The Board-appointed ESG Sub-Committee oversees environmental priorities, reviews progress against targets and evaluates emerging environmental risks and opportunities that may impact the organization.

The committee is responsible for monitoring key environmental focus areas including energy consumption, greenhouse gas emissions, water management, waste management, biodiversity conservation, and climate-related risks. Environmental performance is periodically reviewed as part of the broader ESG governance process and is integrated into our long-term sustainability strategy.

Our environmental management approach is supported by a comprehensive policy framework including:

- Environment Policy
- ESG Policy
- Sustainable Procurement Policy
- Supplier Code of Conduct
- Business Continuity Management Policy

³⁷ 306-3 Waste Generated, 306-4 Waste diverted from/directed to disposal

Together, these policies establish the foundation for responsible environmental management and ensure that sustainability considerations are embedded throughout our operations and decision-making processes.

11.4 Sustainable Infrastructure and Green Campus

SunTec's Technocity Campus in Kerala stands as a reflection of our commitment to sustainable infrastructure and environmentally responsible workplace design.

The campus has been conceptualized and developed using modern sustainable building principles with a strong focus on operational efficiency, employee wellbeing, environmental stewardship, and long-term resilience. The facility is among the first of its kind in Kerala to adopt a steel column-beam skeletal structural system, enabling efficient construction practices and optimized utilization of materials.

The campus was designed by Surbana Jurong, Singapore, a globally recognized consultancy known for its expertise in sustainable urban and infrastructure development. Integrated Facility Management Services are provided by Jones Lang LaSalle (JLL), supporting efficient building operations and continuous improvement in environmental performance.

A major milestone in our sustainability journey is the campus's pursuit of the prestigious IGBC Platinum Certification from the Singapore Building and Construction Authority (BCA). IGBC Platinum represents the highest level of recognition under the IGBC framework and acknowledges excellence in sustainable building design, energy efficiency, resource conservation, indoor environmental quality, and operational sustainability.

Beyond the built infrastructure, the campus has been designed to promote employee wellbeing through spacious work environments, green spaces, natural surroundings, and sustainable workplace practices.

The Technocity Campus serves not only as SunTec's operational headquarters but also as a living example of how sustainability can be integrated into workplace design and business operations.

11.5 Energy Management³⁸

Energy efficiency remains one of the most significant opportunities for reducing environmental impact and supporting climate action. We are committed to optimizing energy consumption across its facilities through responsible energy management practices, operational controls, employee awareness initiatives, and continuous monitoring.

Our energy management efforts focus on:

- Improving energy efficiency across facilities.
- Optimizing lighting and equipment usage.

³⁸ GRI 302-4

- Promoting responsible employee practices.
- Exploring renewable energy opportunities.
- Monitoring and reviewing energy consumption patterns.

The Technocity Campus incorporates various energy-conscious design features intended to improve operational efficiency and reduce unnecessary energy consumption. Preventive maintenance of equipment and infrastructure also contributes to ensuring optimal energy performance.

Recognizing the importance of data-driven environmental management, we have initiated efforts to establish energy consumption baselines and strengthen monitoring mechanisms across facilities. These initiatives will support future target setting and enable better identification of energy conservation opportunities.

As part of our ESG roadmap, we have committed to reducing energy consumption intensity through continuous efficiency improvements while exploring opportunities to increase the share of renewable energy in our operations.

11.6 Climate Change and Emissions Management

Climate change is one of the defining global challenges of our time. At SunTec, we recognize the importance of understanding and managing our contribution to greenhouse gas emissions while supporting the global transition to a low-carbon economy.

Although our direct emissions are relatively limited compared to heavy industrial sectors, we acknowledge our responsibility to identify, measure, monitor, and reduce emissions associated with our operations.

As part of our environmental roadmap, we have initiated actions to:

- Establish greenhouse gas emissions baselines.
- Develop a comprehensive GHG inventory.
- Assess Scope 1 and Scope 2 emissions.
- Identify relevant Scope 3 emission categories.
- Strengthen climate-related risk management.
- Explore renewable energy opportunities.³⁹
- Support long-term decarbonization efforts.

³⁹ GRI 2-22

Our climate commitments include progressive reductions in greenhouse gas emissions intensity, increased use of renewable energy, and the implementation of measures that support energy conservation and resource efficiency.

Through our long-term ESG strategy, SunTec has established an ambition to achieve carbon neutrality by 2050 and will continue to strengthen its climate action initiatives as measurement capabilities and operational maturity evolve.

11.7 Water Stewardship⁴⁰

Water is a critical natural resource that supports both communities and ecosystems. Responsible water management forms an important component of SunTec's environmental strategy.

We strive to minimize water consumption through efficient usage practices, continuous monitoring, awareness programs, and infrastructure improvements wherever feasible. Water conservation considerations are incorporated into facility operations and maintenance activities.

As part of our ESG roadmap, we have committed to:

- Conducting water assessments across facilities.
- Identifying opportunities for reducing freshwater consumption.
- Exploring rainwater harvesting opportunities.
- Evaluating wastewater recycling potential.
- Monitoring water consumption intensity.

Our long-term objective is to improve water-use efficiency while maximizing opportunities for water reuse and recycling across facilities under our operational control.

Through responsible water stewardship, we aim to reduce our environmental impact while contributing to the conservation of this valuable resource.

11.8 Waste Management and Circularity⁴¹

SunTec is committed to minimizing waste generation and promoting responsible waste management practices across its operations.

Our waste management approach follows the principles of:

1. Reduce
2. Reuse

⁴⁰ GRI 303-1

⁴¹ GRI 306-1 Waste Management

3. Recycle

4. Recover

We actively encourage responsible consumption practices, reduction of unnecessary material usage, and improved waste segregation to support effective recycling and disposal.

Particular attention is given to electronic waste management due to the nature of our business operations. Information technology equipment is managed throughout its lifecycle with a focus on responsible usage, reuse where feasible, and environmentally sound disposal at end of life.

We continue to ensure that electronic waste is disposed of through authorized channels and environmentally responsible methods in accordance with applicable regulations.

In addition, we continue to promote:

- Paperless and digital workflows.
- Responsible disposal of office waste.
- Environmentally sound food waste management.
- Reduction in single-use plastic consumption.
- Sustainable procurement practices that support circular economy principles.

Through these initiatives, we seek to reduce waste sent to landfill while promoting more sustainable resource utilization practices.

11.9 Biodiversity and Greenspaces

SunTec believes that businesses have a role to play in preserving and enhancing natural ecosystems. In line with this philosophy, biodiversity conservation forms an important component of our environmental stewardship efforts.

A key highlight of our environmental initiatives is the development and maintenance of a forest ecosystem within our Technocity Campus. Spread across approximately 2.5 acres, this green space comprises more than 15,000 trees, shrubs, and bushes, creating a thriving ecosystem that supports biodiversity and contributes to environmental sustainability.

The initiative provides multiple environmental benefits including:

- Enhanced biodiversity.
- Carbon sequestration.
- Improved air quality.
- Microclimate regulation.
- Soil conservation.



- Improved employee wellbeing through access to natural surroundings.

The forest initiative reflects our commitment to integrating nature into the workplace and creating environmentally responsible campuses that support both people and ecosystems.

Going forward, we will continue to maintain and enhance our green cover while exploring additional opportunities to support biodiversity conservation.

11.10 Building Environmental Awareness

Creating a culture of sustainability requires active participation from employees. SunTec therefore places significant emphasis on environmental awareness and employee engagement.

Through internal communications, awareness campaigns, training sessions, and sustainability initiatives, we encourage employees to adopt environmentally responsible behaviours both within and beyond the workplace.

Our environmental awareness efforts focus on:

- Energy conservation.
- Responsible resource consumption.
- Waste segregation and recycling.
- Sustainable commuting.
- Water conservation.
- Climate change awareness.

By empowering employees to contribute to environmental stewardship, we seek to build a culture where sustainability becomes a shared responsibility.

11.11 Progress Against Our Environmental Commitments

SunTec continues to make measurable progress against the environmental commitments outlined in its ESG roadmap. During the reporting period, the organization advanced several initiatives relating to energy efficiency, emissions management, waste reduction, sustainable infrastructure, biodiversity conservation, and resource efficiency. The table below summarizes progress against key environmental commitments.

<i>Environmental Commitment</i>	<i>Target</i>	<i>Status</i>	<i>Progress Update</i>
<i>Carbon Neutrality Ambition</i>	Achieve carbon neutrality by 2050	● In Progress	Long-term climate commitment remains active. Climate strategy and emissions measurement framework established.



<i>Greenhouse Gas Inventory</i>	Establish Scope 1 and Scope 2 baseline	● In Progress	Emissions measurement initiated and reporting established for Scope 1 and Scope 2 categories.
<i>Scope 3 Assessment</i>	Expand emissions coverage	● In Progress	Business travel emissions measured; expansion to purchased goods, employee commuting and capital goods underway.
<i>Renewable Energy Adoption</i>	Increase renewable energy utilization ⁴²	● In Progress	Renewable energy share increased from 8% to 14%; further expansion planned.
<i>Energy Efficiency</i>	Reduce energy consumption intensity	✓ Achieved	Energy intensity reduced by 15% during the reporting period.
<i>Sustainable Workplace Operations</i>	Improve operational efficiency	✓ Achieved	Hybrid working and infrastructure optimization contributed to a 12% reduction in energy consumption.
<i>Water Efficiency</i>	Improve water consumption efficiency	✓ Achieved	Water consumption reduced by 12% and water intensity improved during the reporting period.
<i>Waste Reduction</i>	Reduce waste generation	✓ Achieved	Total waste generation reduced from 72 MT to 68 MT.
<i>Recycling Improvement</i>	Increase recycling rates	✓ Achieved	Recycling rate improved from 48% to 62%.
<i>E-Waste Management</i>	Responsible disposal through certified recyclers	✓ Achieved	100% of e-waste recycled through authorized vendors.
<i>Single-Use Plastic Reduction</i>	Minimize use of single-use plastics	✓ Achieved	Initiative continues across facilities and operations.
<i>Biodiversity Enhancement</i>	Develop and maintain campus forest ecosystem	✓ Exceeded	Approximately 15,000 trees, shrubs and bushes maintained across a 2.5-acre forest ecosystem.
<i>Sustainable Infrastructure</i>	Develop environmentally efficient facilities	✓ Achieved	Green building principles integrated into campus infrastructure and operations.
<i>Green Building Certification</i>	Pursue IGBC Platinum certification	✓ Achieved	Certification journey continues for the Technocity Campus.

Key areas of progress include:

⁴² GRI 2-22



- Continued development of environmental governance mechanisms.
- Ongoing monitoring of energy and resource consumption.
- Advancement of greenhouse gas inventory initiatives.
- Strengthening of waste management practices.
- Continued maintenance and enhancement of campus biodiversity initiatives.
- Exploration of renewable energy opportunities.
- Continued pursuit of IGBC Platinum Certification for the Technocity Campus.

While significant progress has been made, we recognize that our environmental journey is ongoing. We remain committed to strengthening environmental data collection, improving performance monitoring, and accelerating implementation of our environmental goals.

11.12 Our Policy Framework that focuses on the environment⁴³

SunTec has established a comprehensive policy ecosystem that collectively guides the organization’s environmental management approach, sustainability practices, and operational controls.

These policies establish clear expectations, governance mechanisms, accountability structures, and operational responsibilities relating to environmental sustainability, resource efficiency, infrastructure management, and responsible business operations.

<i>Policy</i>	<i>Objective</i>	<i>Scope</i>
<i>Environmental Sustainability Policy</i>	Defines overall commitment to environmental protection, compliance, and continuous improvement	Organization-wide
<i>Energy Management Policy</i>	Promotes efficient energy use and transition toward lower-carbon energy sources	Offices and IT infrastructure
<i>Waste Management Policy</i>	Ensures responsible waste segregation, recycling, and disposal, including e-waste	All facilities
<i>Water Stewardship Policy</i>	Encourages efficient water use and conservation practices	Facilities and operations
<i>Green IT and Digital Sustainability Policy</i>	Drives energy-efficient IT operations and reduced digital carbon footprint	IT systems and digital operations
<i>Sustainable Procurement Policy</i>	Integrates environmental and sustainability considerations into supplier and sourcing practices	Procurement and vendor ecosystem

⁴³ GRI 2-23





<i>ESG Policy</i>	Establishes the organization's broader ESG governance direction and sustainability commitments	Organization-wide
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These policies are supported through:

- Operational procedures and implementation controls
- Awareness and training initiatives
- Internal reviews and governance oversight
- Risk management integration
- Continuous monitoring and improvement mechanisms

Collectively, this policy framework enables environmental considerations to be integrated into operational execution, infrastructure planning, procurement decisions, digital operations, and long-term business strategy.

11.13 Risk Management and Compliance

Environmental risks at SunTec are managed through an integrated enterprise risk management (ERM) framework, where sustainability-related risks are identified, assessed, and monitored alongside broader operational and business risks.

Key environmental risk areas include:

- Regulatory and compliance risks
- Energy and emissions-related risks
- Climate transition risks
- Infrastructure and operational resilience risks
- Supply chain environmental risks
- Resource dependency risks

These risks are periodically evaluated based on likelihood, operational impact, and business relevance, with defined mitigation plans and ownership across functions.

Key focus areas include:

- Compliance with applicable environmental regulations
- Responsible waste disposal and e-waste management
- Monitoring of emerging climate-related disclosure expectations
- Energy price volatility and emissions exposure
- Infrastructure resilience and operational continuity



- Environmental practices across supplier ecosystems

Environmental considerations are also increasingly integrated into business continuity planning and operational resilience frameworks to strengthen preparedness for climate-related disruptions and infrastructure dependencies.

Compliance is reinforced through:

- Environmental and ESG policies
- Internal operational controls
- Governance reviews
- Vendor management controls
- Continuous monitoring practices

This structured approach enables SunTec to progressively move from reactive compliance toward proactive environmental risk identification, mitigation, and resilience planning.

11.14 Climate Strategy and Net Zero Pathway

At SunTec, climate action is embedded within the core operating model rather than treated as a standalone sustainability initiative. The strategy is shaped by two defining characteristics of the organization’s emissions profile. First, a significant proportion of emissions is driven by electricity consumption across offices and digital infrastructure. Second, a growing share of emissions is expected to originate from the value chain as the organization scales.

Accordingly, the climate strategy focuses on reducing operational emissions through efficiency and infrastructure transformation, while progressively expanding visibility and influence across Scope 3 categories. This dual approach ensures that near-term reductions are achieved where direct control exists, while building the foundation to manage longer-term value chain impacts.

<i>Timeline</i>	<i>Focus Area</i>	<i>Key Actions</i>
2025	Foundation and Baseline	Strengthen Scope 1 and Scope 2 measurement, track business travel emissions, improve energy and water data quality, and establish performance dashboards.
2027	Near-Term Reduction	Reduce Scope 2 emissions by 20–25%, increase renewable energy share to at least 25%, and continue improving emissions intensity.
2030	Value Chain Integration	Expand Scope 3 coverage to include purchased goods and services, employee commuting, capital goods, and supplier-related emissions.





2040	Deep Decarbonization	Strengthen renewable energy adoption, supplier sustainability integration, low-carbon infrastructure, and circular economy practices.
2050	Carbon Neutrality	Progress toward carbon neutrality through direct emissions reduction, renewable energy adoption, value-chain engagement, and credible offset mechanisms where required.

11.15 Green Infrastructure and Digital Sustainability

SunTec’s environmental strategy is closely linked to its digital operating model. As a technology-led organization, the way we design, operate, modernize, and scale digital infrastructure has a direct impact on energy consumption, emissions, and resource efficiency.

Key focus areas include

<i>Focus Area</i>	<i>Approach</i>	<i>Environmental Benefit</i>
<i>Cloud Optimization</i>	Progressive migration from energy-intensive on-premises systems to more efficient cloud-based platforms.	Reduces infrastructure footprint and improves computing efficiency.
<i>Hyperconverged Infrastructure</i>	Consolidation of servers and storage into more efficient infrastructure environments.	Reduces power consumption, rack space, and cooling requirements.
<i>Data Centre Efficiency</i>	Use of containment-based cooling, airflow optimization, and improved infrastructure utilization.	Lowers cooling demand and improves energy performance.
<i>Digital-First Operations</i>	Increased use of digital workflows, electronic approvals, and collaboration platforms.	Reduces paper consumption and administrative resource use.
<i>Hybrid Working Model</i>	Continued use of flexible working and virtual collaboration tools.	Reduces commuting and business travel-related emissions.
<i>IT Asset Lifecycle Management</i>	Responsible use, reuse, refurbishment, and certified disposal of IT assets.	Supports circularity and responsible e-waste management.





<i>Green Procurement for IT</i>	Consideration of energy efficiency, lifecycle impact, and responsible disposal in technology procurement.	Supports lower-impact digital infrastructure decisions.
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We also have achieved lots of milestones with our Green IT initiatives

11.15.1 Green Building Infrastructure

SunTec has invested in environmentally efficient infrastructure, including facilities that meet high green building standards. Key locations are aligned with the Indian Green Building Council (IGBC) framework at the Platinum level, with energy performance improvements of approximately 38.5% over baseline standards.

These facilities incorporate design and operational features such as energy-efficient systems, optimized natural lighting, and water-efficient infrastructure, enabling sustained reductions in resource consumption at the building level.

11.15.2 Green Data Centre Strategy

Data infrastructure represents one of the most material areas of environmental impact for the organization. SunTec has therefore focused on improving efficiency through both architectural and operational changes.

The transition to hyperconverged infrastructure has significantly reduced the number of physical servers required, lowering both power consumption and cooling demand. In parallel, data centre design improvements such as containment-based cooling and airflow management ensure that energy is used more efficiently, with cooling targeted only where required rather than across entire environments.

These changes have resulted in reduced rack space, lower cooling loads, and improved infrastructure utilization, contributing directly to lower energy consumption and emissions intensity.

11.15.3 Digital Sustainability

SunTec's operating model inherently supports resource efficiency through its digital-first approach. The adoption of cloud-based platforms has reduced reliance on energy-intensive on-premises systems, while hybrid working models have contributed to lower commuting and travel-related impacts.

Digital delivery of products and services further minimizes the need for physical resources, enabling scalability without proportional increases in environmental footprint.

11.15.4 Campus Biodiversity Initiative

One of the most distinctive aspects of SunTec's environmental stewardship journey is the development and maintenance of a dedicated green ecosystem within its Technocity campus.





Key highlights include

<i>Initiative</i>	<i>Impact</i>
<i>Campus Forest Development</i>	Approximately 2.5 acres of green cover developed and maintained
<i>Trees, Shrubs and Bushes</i>	More than 15,000 plants maintained across the campus
<i>Native Vegetation</i>	Preference for locally suitable and climate-resilient species
<i>Green Landscaping</i>	Integration of biodiversity considerations into campus planning
<i>Ecological Preservation</i>	Protection of existing natural features wherever feasible

The campus green ecosystem serves multiple environmental functions, including carbon sequestration, microclimate regulation, biodiversity enhancement, dust reduction, and improvement of overall environmental quality for employees and visitors.

11.15.5 Water and Ecosystem Conservation⁴⁴

SunTec complements its biodiversity initiatives through responsible water management practices that support environmental conservation objectives.

Key measures include:

- Rainwater harvesting systems
- Groundwater recharge initiatives
- Water-efficient infrastructure
- Landscape irrigation optimization
- Monitoring of water consumption and conservation opportunities

These initiatives contribute to reducing pressure on local water resources while supporting long-term environmental resilience.

11.15.6 Green Infrastructure Approach

Environmental considerations are incorporated into infrastructure planning and facility management practices.

Key focus areas include:

⁴⁴ GRI 303-2



- Sustainable campus development
- Green building principles
- Efficient land utilization
- Preservation of green spaces
- Reduction of heat-island effects through landscaping
- Enhancement of natural environmental conditions around operational facilities

11.16 Environmental Awareness and Employee Participation

SunTec believes that environmental sustainability must be supported not only through infrastructure and operational controls, but also through organizational culture and employee participation.

We regularly conduct:

- Sustainability awareness initiatives
- Employee engagement campaigns
- Environmental volunteering programs
- Sustainability communication activities
- Environment-focused participation initiatives

During the reporting period, employees participated in initiatives including:

- World Environment Day campaigns
- Earth Hour participation programs
- Beach cleaning activities
- Sustainability awareness drives
- Community environmental engagement initiatives

These initiatives help reinforce environmental responsibility as a shared organizational value while encouraging environmentally conscious behaviour both within and beyond the workplace

11.17 Future Outlook

SunTec recognizes that environmental sustainability, climate resilience, and responsible resource management will continue to play an increasingly important role in operational resilience, stakeholder expectations, regulatory preparedness, and long-term competitiveness.

In the near term, our focus remains on:

- Improving ESG data quality and measurement maturity

- Expanding Scope 3 emissions visibility
- Increasing renewable energy adoption
- Improving infrastructure efficiency
- Strengthening resource efficiency practices
- Enhancing supplier sustainability integration

Over the medium term, we intend to:

- Strengthen value-chain sustainability integration
- Expand environmental performance monitoring
- Improve supplier environmental engagement
- Increase operational efficiency across infrastructure and digital systems
- Enhance alignment with global ESG frameworks and disclosure expectations

In the longer term, we aim to progressively align its climate and environmental strategy with globally recognized sustainability methodologies and evolving Net Zero transition approaches.

We remain committed to delivering measurable and operationally sustainable progress through phased execution, continuous improvement, responsible innovation, and long-term environmental stewardship.

12. Labor and Human Rights – In detail

12.1 Our Commitment to People

At SunTec, people are at the heart of our success. We believe that creating an inclusive, equitable, safe, and respectful workplace is fundamental to building a sustainable organization. Our approach is guided by strong policies, responsible leadership, and a culture that values diversity, dignity, fairness, and equal opportunity for all associates. SunTec's commitment extends beyond compliance to fostering a workplace where every individual feels respected, empowered, and able to contribute their best.

12.2 Performance Indicators

PEOPLE & WORKPLACE PERFORMANCE FY 2026

Building an inclusive, healthy and empowering workplace where people can thrive and drive sustainable success.



WORKFORCE

- 500+ Employees
- 100% Health Insurance Coverage
- 100% Eligible Employees Covered by Maternity Benefits
- 100% Eligible Employees Covered by Paternity Benefits

LEARNING & DEVELOPMENT

- 60+ Average Learning Hours per Employee
- SunTec Academy Learning Programs
- Leadership Development Initiatives
- Continuous Professional Development

KEY HIGHLIGHTS

- Workforce of 500+ employees
- Delivered 60+ learning hours per employee
- Maintained zero human rights violations
- Maintained zero forced labour and child labour incidents
- Expanded employee wellbeing and engagement initiatives
- Strengthened DEI governance and accountability
- Enhanced POSH governance and reporting mechanisms
- Formalized supplier human rights expectations

DIVERSITY, EQUITY & INCLUSION

- Enhanced DEI Policy
- Inclusive Workplace Practices
- Equal Opportunity Employment
- Ongoing Awareness & Sensitization Programs

HUMAN RIGHTS & WORKPLACE ETHICS

- 0 Human Rights Violations
- 0 Forced Labour Cases
- 0 Child Labour Cases
- Supplier Human Rights Expectations Formalized

EMPLOYEE WELLBEING

- Expanded Wellbeing Programs
- Counselling & Employee Assistance
- Health & Wellness Initiatives
- Employee Engagement Activities

SAFE & RESPECTFUL WORKPLACE

- Enhanced POSH Governance Framework
- Dedicated Anti-Sexual Harassment Committee
- Confidential Grievance Mechanisms
- Safe & Inclusive Workplace Culture

EMPLOYEE-CENTRIC CAMPUS ENVIRONMENT

Our modern campus is designed to support wellbeing, learning and collaboration through world-class facilities and amenities.

- Collaborative Workspaces
- Learning Facilities
- Wellness & Gymnasium
- Sports & Recreation
- Engagement Spaces
- Transportation & Support

500+ Workforce

60+ Learning Hours per Employee

100% Health Insurance Coverage

0 Human Rights Violations

0 Forced Labour Cases

0 Child Labour Cases

Enhanced DEI Governance

Enhanced POSH Governance

12.3 Diversity, Equity and Inclusion at SunTec

SunTec is committed to fostering a workplace culture that embraces diversity, advocates equity, and promotes inclusion across all aspects of the employee lifecycle. We recognize and respect the unique identities, experiences, perspectives, and backgrounds of our associates, understanding that diversity strengthens innovation, collaboration, and organizational resilience.

Our Diversity, Equity and Inclusion (DEI) framework is embedded across key talent processes including:

- Recruitment and selection practices designed to attract diverse talent pools
- Inclusive hiring approaches and unbiased selection criteria
- Equal pay for equal work principles
- Fair and objective performance management processes
- Talent reviews, mentoring, and career development opportunities
- Professional development and competency-building programs
- Flexible workplace practices that support individual needs
- Employee engagement initiatives that encourage participation across diverse groups.

During the reporting period, we also encouraged participative DEI governance through initiatives such as “Voice IT, Shape IT,” which enabled employees to provide feedback on DEI-related policies and workplace practices. This reflects our belief that inclusion must be built not only through policies, but also through employee voice, participation, and continuous dialogue. Our broader inclusion efforts are also supported through employee engagement initiatives, awareness programs, leadership participation, workplace sensitization activities, and policy-level commitments designed to strengthen equitable workplace practices and foster a culture of dignity, respect, and belonging across the organization.

We believe that an inclusive workplace not only improves employee experience but also enables stronger business outcomes through diverse thinking and innovation.

12.4 Our commitment to Human Rights

Respect for human rights forms a core component of SunTec's ESG framework. We are committed to conducting business in a manner that upholds dignity, fairness, equality, and respect for all individuals impacted by our operations, including employees, customers, suppliers, shareholders, and communities.

Our Human Rights Policy aligns with internationally recognized frameworks including:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)

- Universal Declaration of Human Rights
- International Labour Organization (ILO) Core Labour Standards
- OECD Guidelines for Multinational Enterprises
- United Nations Global Compact principles
- UK Modern Slavery Act and related human rights regulations.

We maintain a zero-tolerance approach toward child labour, forced labour, human trafficking, modern slavery, discrimination, exploitative labour practices, and any form of human rights abuse. Human rights considerations are integrated into our governance processes, employee policies, and supplier expectations.

SunTec is committed to maintaining a workplace where every associate feels safe, respected, and free from discrimination, harassment, bullying, or inappropriate conduct.

Our policies establish a zero-tolerance stance towards:

- Workplace harassment and bullying
- Discrimination of any kind
- Sexual harassment
- Retaliation against individuals raising concerns
- Any conduct that undermines dignity and respect in the workplace.

To reinforce this commitment, SunTec has established formal grievance redressal mechanisms and dedicated committees to address concerns promptly, confidentially, and fairly. Associates are encouraged to report concerns without fear of retaliation, ensuring that issues are investigated and resolved appropriately.

Regular awareness programs and sensitization initiatives help reinforce a culture of mutual respect and professional conduct across the organization.

12.5 Employee Well-being and Support

We recognize that employee well-being extends beyond the workplace and includes physical, mental, social, and professional dimensions.

Our people-centric practices include:

- Comprehensive health insurance coverage for all employees
- Flexible work arrangements where applicable
- Multiple categories of leave supporting personal and family needs
- Professional development opportunities

- Talent reviews and career growth planning
- Employee engagement and wellness initiatives
- Safe transportation facilities and support services across key locations.

These initiatives help create an environment where employees can thrive personally and professionally while maintaining a healthy work-life balance.

Our wellbeing approach is holistic and covers physical, mental, emotional, financial, and social wellbeing. During the reporting period, the organization conducted and enabled a wide range of employee wellbeing initiatives, including healthcare partnerships, preventive health programs, yoga and fitness initiatives, mental wellness support, insurance awareness, first-aid training, and employee engagement activities.

Key initiatives in the reporting period included:

- Exclusive healthcare partnerships with Ananthapuri Hospital and Credence Hospital
- Dental and vision camps
- Free medical camps at SunTec Trivandrum
- Ayurvedic consultation and wellness sessions
- Diabetes awareness webinars
- Professional counselling support through Bodhini NGO
- Group health insurance program and escalation support
- Insurance awareness and enrolment support
- CPR and paediatric first-aid training
- Weekly health tips and preventive wellness communications
- Financial planning and tax filing assistance sessions

These initiatives reflect SunTec's focus on preventive care, employee support, and accessible wellbeing resources.

Employee wellbeing initiatives were further supported through periodic awareness communications, preventive healthcare engagement programs, and employee support initiatives conducted throughout the year. Internal communication campaigns covered areas such as wellness awareness, preventive healthcare, employee insurance support, medical guidance, emotional wellbeing, and healthy workplace practices.

We recognize that employee wellbeing extends beyond physical and emotional health. Financial awareness, access to support services, and ease of employee administration are also important components of a supportive workplace.

During the reporting period, relevant initiatives included:

- Personal financial planning sessions
- India Post help desk for financial, savings, and insurance schemes
- Tax return filing assistance
- ClearTax webinar on investment declarations and proof submission
- Insurance awareness and enrolment communications
- Group health insurance communication and escalation support

These initiatives helped employees make informed decisions on financial planning, taxation, savings, insurance, and benefits access, thereby supporting broader financial wellbeing and employee confidence.

These initiatives helped strengthen accessibility to wellbeing resources while encouraging a proactive and preventive approach toward employee health and wellness.

We also believe that wellbeing must be embedded not only in policies and programs, but also in the everyday workplace experience. Our campus and workplace environment are designed to support employee comfort, collaboration, recreation, and wellbeing through employee-centric infrastructure, green landscapes, open spaces, and wellness-oriented engagement areas.

During the reporting period, we expanded employee-focused facilities and engagement opportunities, including:

- Clubhouse gym opening
- Clubhouse swimming pool opening
- Badminton court opening
- Cafeteria opening at the clubhouse
- Swimming training initiative
- Zumba sessions
- International Yoga Day and Yoga Week programs
- GTech Kerala Marathon participation support
- Sports tournaments including cricket, badminton, carrom, football, and SunTec Premier League

These initiatives help employees engage beyond day-to-day work, encouraging physical wellness, teamwork, belonging, and a stronger workplace community. The organization also continued to encourage employee participation in recreational, fitness, and community-driven activities through employee clubs, campus engagement initiatives, and wellness-oriented

participation programs aimed at strengthening workplace experience, collaboration, and employee belonging.

12.6 Responsible Supply Chain and Human Rights Due Diligence

SunTec's commitment to human rights extends beyond its own operations into its supply chain.

Through our Sustainable Procurement Policy and Supplier Code of Conduct, we encourage suppliers to uphold high standards relating to:

- Human rights protection
- Prevention of child labour and forced labour
- Fair wages and working conditions
- Diversity and non-discrimination
- Health and safety
- Ethical business conduct
- Environmental responsibility.

We expect suppliers to align with our values and continuously improve their social, environmental, and governance practices, thereby contributing to a more responsible and sustainable value chain.

12.7 Governance and Policy Framework⁴⁵

SunTec's labour and human rights practices are governed through a structured policy and governance framework that establishes accountability, ethical workplace standards, and consistent implementation across business functions and geographies.

Oversight of people practices and human rights commitments is embedded within the organization's broader governance and ESG operating structure. Cross-functional collaboration between leadership, human resources, legal, compliance, administration, information security, and ESG-related functions help ensure that employee welfare, workplace ethics, inclusion, and responsible conduct remain integrated into operational decision-making and organizational culture.

Key policies and frameworks supporting responsible workplace practices include⁴⁶:

- Human Rights Policy
- Code of Conduct
- POSH Policy

⁴⁵ GRI 2-23

⁴⁶ GRI 2-25

- Diversity, Equity and Inclusion Policy
- Talent Policy
- Performance Management Policy
- Occupational Health and Safety Policy
- Employee Privacy and Data Protection policies
- Supplier Code of Conduct
- Sustainable Procurement Policy

These policies are applicable across employees and operational locations, integrated into onboarding and employee lifecycle processes, reinforced through communication and training, and periodically reviewed to align with evolving business, regulatory, and ESG expectations.

During the reporting period, SunTec also strengthened its policy maturity through updates and communications relating to DEI and Occupational Health and Safety, further reinforcing its commitment to fair, safe, inclusive, and responsible workplace practices.

SunTec also strengthened alignment with globally recognized inclusion and responsible workplace frameworks during the reporting period, including participation in the Women's Empowerment Principles (WEPs) initiative, reinforcing the organization's commitment toward gender inclusion, workplace equity, and responsible people practices.

The organization's broader labour and human rights commitments are further aligned with its participation in initiatives such as the United Nations Global Compact (UNGC), which supports internationally recognized principles relating to labour standards, workplace dignity, and human rights.

12.8 Learning, Awareness and Capability Building⁴⁷

Continuous learning, awareness, and capability development remain integral to SunTec's people strategy and governance culture. The organization recognizes that building a resilient and responsible workforce requires sustained focus on learning, awareness, employee preparedness, and professional growth.

Employees participate in multiple awareness and training initiatives designed to strengthen organizational resilience, ethical conduct, security awareness, leadership, and operational responsibility. Key programs include:

- Mandatory Business Continuity Management training
- Information security and cybersecurity awareness initiatives
- Data privacy and confidentiality awareness programs

⁴⁷ GRI 404-2 Learning Programs

- Information security and privacy pledge initiatives
- Cyber threat and fraud prevention advisories
- Deepfake and digital fraud awareness sessions
- Responsible workplace conduct programs
- Mandatory POSH training through SunTec Academy
- Product trainings
- Women leadership trainings called eWIT
- Product and technical trainings

During the reporting period, employees also participated in multiple awareness and resilience-building communication initiatives relating to:

- Cybersecurity and phishing awareness
- Deepfake and digital fraud awareness
- Privacy and confidentiality expectations
- Business continuity preparedness
- Emergency response and safety awareness
- Responsible digital behaviour and information handling

These initiatives were reinforced through periodic internal advisories, awareness campaigns, mandatory learning programs, and governance communications across the organization.

These initiatives help strengthen employee accountability, improve preparedness against emerging digital and operational risks, reinforce compliance practices, support responsible handling of information, and enhance organizational resilience.

In addition to compliance and governance-focused learning, SunTec continues to encourage employee development through structured performance management processes, learning platforms, career growth opportunities, internal mobility, and Individual Development Plans. Talent review processes and digital enablement initiatives, including Single Sign-On activation for HR systems, further support employee experience and structured people governance.

12.9 Human Rights and Ethical Labor Practices

SunTec maintains a zero-tolerance approach toward violations of human rights and unethical labour practices. The organization is committed to operating responsibly and ethically while upholding internationally recognized human rights standards across its operations.

SunTec prohibits:

- Child labour
- Forced or compulsory labour
- Discrimination and harassment
- Exploitative workplace practices
- Unethical employment practices

These commitments are supported through ethical hiring procedures, workplace safeguards, employee grievance mechanisms, responsible workplace policies, and governance practices designed to protect employee rights and promote fair treatment.

SunTec also recognizes the importance of extending responsible labour and human rights practices across the broader value chain. Human rights expectations are increasingly integrated into supplier and vendor engagement through Supplier Code of Conduct requirements, vendor onboarding due diligence, ESG-linked supplier governance, and responsible procurement practices.

The organization continues to strengthen awareness and alignment across business functions to ensure that labour and human rights considerations remain embedded within operational and supply chain practices.

12.10 Employee Engagement and Community Participation

Employee engagement forms an integral part of SunTec's people philosophy. The organization believes that a strong workplace culture is built through participation, celebration, collaboration, recognition, and shared identity.

During the reporting period, SunTec conducted and enabled multiple engagement initiatives that supported workplace belonging and employee connection, including:

- Onam celebrations and LAYAM 25
- Republic Day and Independence Day flag-hoisting ceremonies
- Ayudha Puja office observance
- Diwali celebrations for employees and families
- Fan clubs and team jerseys
- Cricket, football, badminton, carrom, and SunTec Premier League events
- Employee merchandise and community-building initiatives

These activities contribute to a participative and inclusive workplace culture, helping employees connect across teams and functions while strengthening organizational identity and morale. The organization also continued to encourage employee participation through culture-building initiatives, family-inclusive celebrations, workplace engagement programs, and social

participation activities that helped strengthen collaboration, inclusion, and employee connection across teams and locations.

Employees participate in initiatives and campaigns also happen across areas such as:

- Blood donation drives
- School support and educational assistance programs
- Community distribution initiatives
- Disaster relief and rehabilitation support
- Environmental awareness campaigns
- Volunteering and social outreach initiatives
- World Environment Day activities

These programs help strengthen employee participation, social awareness, shared responsibility, and alignment between employee engagement and organizational ESG goals.

Employee-led and organization-supported initiatives during the reporting period included:

- Blood donation campaigns
- Disaster relief and rehabilitation support activities
- Environmental volunteering and awareness drives
- Educational and community outreach initiatives
- Sustainability participation campaigns and employee volunteering programs
- SunTec also celebrated the World Environment Day celebration and achieved recognition through LIBA's Special Award for Corporate Citizen 2023–24, reinforcing SunTec's broader responsible citizenship positioning.

These initiatives reflect SunTec's belief that employee engagement and responsible citizenship should extend beyond workplace operations into broader community and environmental impact.

12.11 *Grievance Mechanisms and Ethical Conduct*⁴⁸

SunTec maintains structured grievance redressal and whistleblower mechanisms to enable employees and stakeholders to raise concerns responsibly, securely, and confidentially. The organization encourages employees to report concerns relating to workplace conduct, ethics, discrimination, harassment, compliance, inappropriate behaviour, or violations of company policies through established reporting channels.

⁴⁸ GRI 2-25

The grievance framework is supported through:

- Whistleblower mechanisms
- Structured escalation and review processes
- Confidential handling of complaints
- Defined investigation and resolution approaches
- Non-retaliation safeguards for reporting individuals
- POSH-related complaint and redressal processes

The organization remains committed to maintaining a culture where employees feel safe to raise concerns without fear of retaliation or discrimination. These mechanisms reinforce accountability, ethical conduct, transparency, and trust across the organization.

Mandatory POSH training reminders and awareness initiatives during the reporting period further demonstrate SunTec's continued focus on respectful workplace conduct and prevention of harassment. Periodic awareness communications, policy reminders, POSH awareness initiatives, and governance-led sensitization programs further supported employee awareness regarding respectful workplace conduct, ethical behaviour, reporting mechanisms, and grievance redressal processes.

12.12 Compensation Commitment⁴⁹

Employee remuneration is determined through a structured process that considers role requirements, competencies, experience, individual performance, internal equity, market benchmarks, and organizational performance. Periodic compensation reviews are undertaken to maintain competitiveness, support talent retention, and promote fair and consistent reward practices across the organization. The Company's remuneration practices are supported through its Talent Policy, Performance Management Policy, Diversity, Equity & Inclusion Policy, Human Rights Policy, and other related people management frameworks that promote fair, transparent, merit-based, and non-discriminatory employment practices across the employee lifecycle.

12.13 Outlook and Continuous Improvement

SunTec recognizes that labour and human rights practices must continuously evolve in response to changing workforce expectations, business growth, emerging ESG priorities, and evolving global standards.

Going forward, we remain committed to:

- Expanding employee learning and development initiatives

⁴⁹ GRI 2-19, GRI 2-20

- Strengthening diversity, equity, and inclusion programs
- Enhancing employee wellbeing, healthcare, and engagement initiatives
- Strengthening mental wellness and preventive care support
- Improving employee financial wellbeing and benefits awareness
- Strengthening supplier due diligence and responsible procurement practices
- Increasing employee participation in environmental and social initiatives
- Further improving governance, monitoring, and ESG reporting maturity

As part of its broader ESG journey, we will continue to strengthen its people-centric culture while building a workplace environment that supports responsible growth, employee wellbeing, ethical conduct, inclusion, and long-term organizational resilience.

We also intend to continue strengthening:

- Employee wellness and preventive care programs
- Inclusion and belonging initiatives
- Workplace engagement and participation models
- Governance-led awareness and learning programs
- Employee volunteering and community participation
- Responsible workplace and human rights practices across the value chain

12.14 Future Outlook

We recognize that our people are the foundation of its continued success and innovation. As we grow and evolve, we remain committed to fostering a workplace where employees can thrive, contribute meaningfully, and achieve their full potential.

In the coming years, we will continue to strengthen its people practices by focusing on employee wellbeing, learning and development, diversity and inclusion, leadership capability, and employee engagement. The organization aims to create an environment that not only attracts top talent but also supports long-term career growth and personal development.

Key focus areas include:

- Enhancing learning and development opportunities through structured capability-building programs, leadership development initiatives, and continuous upskilling.
- Strengthening employee wellbeing through physical, mental, emotional, and financial wellness initiatives.

- Expanding employee engagement programs that encourage collaboration, recognition, innovation, and a strong sense of belonging.
- Advancing diversity, equity, and inclusion efforts to create a workplace where every employee feels respected, valued, and empowered.
- Further improving employee listening mechanisms and feedback channels to ensure that employee voices continue to shape workplace improvements.
- Supporting future-ready workforce development by building capabilities in emerging technologies, digital transformation, and leadership competencies.
- Strengthening talent management practices, including succession planning, career progression frameworks, and internal mobility opportunities.

We will also continue to nurture its culture of trust, transparency, teamwork, and accountability while maintaining high standards of employee rights, fair employment practices, and workplace ethics.

By investing in its people and fostering an inclusive and empowering work environment, we aim to build a resilient, engaged, and future-ready workforce that contributes to sustainable business success and positive societal impact.

13. Ethics, Compliance and Responsible Business Conduct – In detail

13.1 Our Commitment to Ethical Business Conduct

At SunTec Business Solutions, ethics, integrity, accountability, and responsible conduct form the foundation of the way we operate as an organization. We believe that long-term business sustainability can only be achieved through transparency, trust, fairness, compliance, and responsible decision-making. As a global technology and business solutions provider operating across multiple geographies and serving highly regulated industries, we recognize the importance of maintaining strong ethical standards across all aspects of our business operations, stakeholder interactions, technology practices, and governance processes.

At SunTec, ethics and compliance are not viewed solely as governance requirements but as strategic enablers of trust, resilience, and sustainable growth. Customer confidence, operational excellence, digital trust, and long-term stakeholder relationships are built upon responsible conduct, robust governance, strong cybersecurity practices, regulatory compliance, and ethical decision-making. These principles guide the way we engage with customers, employees, suppliers, regulators, partners, and communities.

Our commitment to ethical business practices extends across employees, customers, suppliers, partners, and the broader communities in which we operate. We strive to conduct business responsibly and in compliance with applicable legal, regulatory, and governance requirements while continuously strengthening our culture of integrity, accountability, operational discipline, and responsible corporate behaviour.

SunTec's approach is aligned with:

- United Nations Global Compact (UNGC) principles relating to anti-corruption and responsible business conduct
- Applicable legal and regulatory requirements across operational jurisdictions
- Industry best practices relating to ethics, governance, privacy, cybersecurity, and compliance
- Internal governance frameworks and organizational policies designed to promote accountability, transparency, and operational resilience

We maintain a zero-tolerance approach toward unethical behaviour, including bribery, corruption, fraud, misconduct, conflicts of interest, discrimination, retaliation, and non-compliance with applicable laws and internal standards. Ethical conduct is expected across all levels of the organization and is embedded into governance frameworks, operational practices, workplace culture, stakeholder engagement, and technology operations.

Our ethics and compliance culture are reinforced through governance-led awareness initiatives, operational communication programs, cybersecurity advisories, privacy awareness initiatives, and compliance engagement activities conducted across the organization. These initiatives strengthen awareness relating to ethics, responsible conduct, digital trust, cybersecurity, privacy, operational accountability, and responsible technology usage across employees and stakeholders.

13.2 Ethics and Compliance Performance Snapshot

 ETHICS, INTEGRITY & COMPLIANCE PERFORMANCE Upholding the highest standards of ethics, transparency and accountability in all that we do.		
ZERO TOLERANCE COMMITMENTS	CY2024	CY2025
 Confirmed Corruption Incidents	 0 Zero	 0 Zero
 Material Fraud Cases	 0 Zero	 0 Zero
 Human Rights Violations	 0 Zero	 0 Zero
 Material Regulatory Penalties	 0 Zero	 0 Zero
 Material Data Breaches	 0 Zero	 0 Zero
GOVERNANCE & FRAMEWORK STATUS	CY2024	CY2025
 Whistleblower Framework	 Active	 Active
 Anti-Bribery and Anti-Corruption Framework	 Active	 Active
 ISO 27001 Information Security Framework	 Maintained	 Maintained
 Human Rights Policy	 Developing	 Implemented
 Responsible AI Governance Framework	 Emerging	 Strengthened
		



13.3 Governance and Oversight

Ethics and compliance at SunTec are governed through a structured governance framework designed to ensure accountability, transparency, consistency, and oversight across business functions and operational geographies.

Oversight is supported through leadership-driven governance mechanisms and broader ESG governance structures, with collaboration across legal, human resources, compliance, administration, information security, procurement, and operational functions. This integrated approach ensures that ethical principles, compliance expectations, and governance responsibilities remain embedded across organizational processes, operational practices, technology environments, and business decision-making activities.

13.4 Ethics and Compliance Governance Model

<i>Governance Layer</i>	<i>Responsibilities</i>
<i>Board and Leadership Oversight</i>	Strategic governance, accountability, culture setting, and oversight
<i>ESG Governance Framework</i>	Monitoring ethics, compliance, risk, privacy, cybersecurity, and ESG-related governance topics
<i>Legal and Compliance Functions</i>	Regulatory compliance, policy governance, investigations, and advisory support
<i>Information Security Function</i>	Cybersecurity, privacy, information security, and digital trust
<i>Human Resources</i>	Workplace conduct, ethics awareness, employee engagement, and grievance management
<i>Procurement and Vendor Management</i>	Supplier governance, responsible sourcing, and third-party compliance

Ethical considerations are integrated into:

- Enterprise risk management processes
- Governance and compliance frameworks
- Operational decision-making
- Employee conduct expectations
- Information security and privacy practices
- Vendor and stakeholder engagement practices





- Digital governance and responsible technology adoption

This integrated governance model reinforces a culture of accountability, transparency, and responsible conduct while strengthening governance maturity, operational resilience, and stakeholder trust.

We continue to strengthen governance maturity through structured awareness initiatives relating to:

- Information security and cyber hygiene
- Privacy and confidentiality expectations
- Business continuity preparedness
- Responsible technology usage
- Workplace conduct and policy awareness
- Emerging digital risks and fraud prevention

Governance oversight is further supported through:

- Periodic policy reviews
- Compliance monitoring mechanisms
- Awareness and sensitization programs
- Risk and resilience reviews
- Internal governance discussions
- ESG-aligned governance integration

13.5 Policy Framework

SunTec has established a comprehensive ethics, compliance, privacy, cybersecurity, and governance policy ecosystem designed to support responsible business conduct, regulatory compliance, ethical decision-making, information security, privacy protection, operational accountability, and stakeholder trust.

Core Ethics, Compliance and Digital Trust Policies

<i>Policy</i>	<i>Purpose</i>
<i>Code of Conduct</i>	Defines standards of ethical behaviour, integrity, and professional conduct.
<i>Anti-Bribery and Anti-Corruption Policy</i>	Prohibits bribery, corruption, facilitation payments, and unethical business practices.





<i>Whistleblower Policy</i>	Enables confidential reporting and investigation of concerns.
<i>Human Rights Policy</i>	Reinforces commitment to internationally recognized human rights principles.
<i>Data Protection and Privacy Policy</i>	Governs responsible collection, processing, storage, and protection of personal information.
<i>Information Security Policy</i>	Protects confidentiality, integrity, and availability of information assets.
<i>Applicable Laws and Compliance Policy</i>	Supports compliance with applicable legal and regulatory obligations.
<i>Supplier Code of Conduct</i>	Defines ethical, social, environmental, and governance expectations for suppliers.
<i>Sustainable Procurement Policy</i>	Integrates sustainability and ESG considerations into procurement activities.
<i>Media Spokesperson Policy</i>	Provides governance for external communications and public statements.
<i>Artificial Intelligence Usage Policy</i>	Guides responsible, secure, and ethical use of artificial intelligence technologies.

13.6 Supporting Governance and Security Frameworks

The broader governance ecosystem is supported through policies and standards relating to:

- Cybersecurity and data protection
- Access management and endpoint security
- SaaS security and cloud governance
- Incident management and breach notification
- Business continuity and operational resilience
- Privacy and confidentiality practices
- Responsible technology usage
- Vendor governance and responsible procurement

These policies are integrated into onboarding programs, operational processes, awareness initiatives, and governance communications, and are periodically reviewed to align with evolving regulatory, business, and cybersecurity requirements.





13.7 Anti-Corruption and Ethical Practices

We are committed to conducting business fairly, transparently, responsibly, and ethically across all operational activities and stakeholder engagements. We maintain a strong position against bribery, corruption, fraud, unethical conduct, conflicts of interest, and improper business practices.

Anti-Corruption Commitments

<i>Commitment</i>	<i>Status</i>
<i>Zero Tolerance for Bribery</i>	Active
<i>Zero Tolerance for Corruption</i>	Active
<i>Conflict of Interest Management</i>	Active
<i>Ethical Escalation Mechanisms</i>	Active
<i>Governance Oversight</i>	Active
<i>Ethics Awareness Programs</i>	Ongoing

Our employees are expected to adhere to ethical standards in all interactions involving customers, suppliers, business partners, regulators, and colleagues. Ethical expectations are reinforced through leadership communication, governance awareness initiatives, compliance-driven operating practices, and periodic advisories relating to accountability, professional behaviour, escalation mechanisms, and organizational integrity.

These measures help reinforce a workplace culture where ethical conduct is integrated into day-to-day business activities, operational governance, and organizational decision-making.

13.8 Awareness and Capacity Building

Building awareness and strengthening employee capability remain central to our ethics and compliance approach. The following are the key themes in which employee awareness was increased

- Ethical Standards and Workplace Conduct
- Information Security and Privacy
- Cybersecurity Awareness
- Digital Fraud Prevention
- Emerging Technology Risks



- Responsible Data Handling
- Operational Resilience
- Responsible Digital Behaviour

During the reporting period, employees participated in multiple awareness initiatives covering:

- Phishing and cyberattack awareness
- Deepfake and digital impersonation risks
- Data privacy and confidentiality obligations
- Secure collaboration and communication practices
- Business continuity preparedness
- Responsible handling of organizational and customer information

During the reporting period, the following key governance initiatives were considered

- Cyber threat advisories
- Deepfake awareness and fraud prevention sessions
- Information security pledge initiatives
- Data privacy awareness communications
- Business continuity and resilience awareness programs
- Governance-led sensitization and operational advisory initiatives

These initiatives contribute to strengthening employee accountability, reinforcing responsible business conduct, enhancing awareness of operational and digital risks, supporting governance objectives, building digital trust, and improving preparedness against emerging cybersecurity threats.

13.9 Speak-Up Culture and Grievance Mechanisms

We promote a culture of openness, accountability, and responsible reporting by providing employees and stakeholders with structured mechanisms to raise concerns and report unethical or inappropriate conduct. The following areas are considered for grievance mechanisms through a set of stringent governance principles.

- Ethical Conduct and Integrity Concerns
- Workplace Behaviour and Practices
- Compliance-Related Issues

- Policy Violations
- Governance and Operational Concerns
- Harassment and Discrimination Matters

The following are the governance principles that are aligned with our speak-up policy

- Confidential Reporting
- Protection Against Retaliation
- Structured Investigation Processes
- Defined Escalation Mechanisms
- Governance Oversight
- POSH Complaint and Redressal Framework

We remain committed to ensuring that employees feel safe, respected, and empowered to raise concerns responsibly and without fear of retaliation.

13.10 Data Privacy, Information Security and Digital Trust

As a technology-driven organization, we place significant emphasis on safeguarding information, protecting privacy, and maintaining strong information security practices across operations, digital systems, and stakeholder interactions.

Digital Trust Framework

Digital trust remains central to our approach to governance and customer stewardship.

Key focus areas include:

- Information security governance
- Data privacy and protection
- Cybersecurity resilience
- Secure product development
- Business continuity and operational resilience
- Responsible technology governance
- Ethical AI adoption

Privacy and information security practices are supported through:

- ISO 27001-aligned governance and security frameworks
- Information security policies and operational controls
- Access management and encryption practices
- Endpoint and SaaS security measures
- Incident response and breach management frameworks
- Business continuity and resilience practices
- Employee awareness and security training initiatives

We also maintain privacy-focused governance practices aligned with applicable regulations including GDPR and related data protection requirements.

13.11 Responsible Technology and AI Governance

As a digital and technology-focused organization, we recognize the growing importance of responsible technology governance, digital trust, cybersecurity resilience, and ethical digital practices.

We promote:

- Ethical use of digital systems and technologies
- Responsible deployment of emerging technologies, including artificial intelligence
- Secure and compliant product development practices
- Responsible handling of customer and stakeholder information
- Alignment between innovation, governance, security, and ethical standards

We also adhere to responsible AI practices that are listed in our policy. These include -:

- Human oversight and accountability
- Data privacy and security
- Transparency and explainability
- Responsible use of information
- Risk-based governance
- Regulatory compliance
- Continuous monitoring and improvement

During the reporting period, internal awareness initiatives relating to deepfake risks, secure AI usage, digital impersonation threats, responsible technology adoption, and cybersecurity



preparedness were conducted to strengthen employee awareness regarding emerging digital and operational risks.

These initiatives reflect our evolving approach toward balancing innovation with governance, security, operational accountability, and responsible technology usage.

13.12 Compliance and Continuous Improvement

We maintain a proactive approach toward compliance and governance maturity by continuously strengthening internal processes, operational controls, awareness initiatives, monitoring practices, and policy frameworks.

These are our continuous improvement focus areas with respect to compliance and governance

- Governance Framework Enhancement
- Policy Reviews and Updates
- Compliance Monitoring
- Cybersecurity Awareness Expansion
- Privacy Governance Strengthening
- Reporting and Monitoring Improvements
- Operational Resilience Enhancement

We remain committed to complying with applicable laws, regulations, contractual obligations, and internal governance requirements across operational jurisdictions while continuously improving governance effectiveness and organizational resilience.

13.13 Future Outlook

We recognize that ethics, compliance, privacy, cybersecurity, digital trust, and responsible technology governance will continue to play an increasingly important role in shaping sustainable business operations, operational resilience, and stakeholder confidence.

<i>Priority Area</i>	<i>Focus</i>
<i>Ethics and Compliance</i>	Strengthen governance maturity and oversight
<i>Privacy and Data Protection</i>	Enhance compliance with evolving regulations
<i>Cybersecurity</i>	Expand resilience and threat preparedness
<i>Responsible AI</i>	Strengthen governance frameworks and awareness





<i>Supplier Governance</i>	Expand ESG expectations across the value chain
<i>Digital Trust</i>	Strengthen secure and responsible technology practices
<i>Operational Resilience</i>	Enhance preparedness and business continuity

Going forward, we will continue strengthening governance-led awareness programs, cybersecurity and privacy maturity, operational preparedness capabilities, ethics integration across supplier ecosystems, and responsible technology governance across emerging digital environments.

Through these efforts, we aim to further reinforce a culture of integrity, accountability, transparency, responsible innovation, operational resilience, digital trust, and ethical business conduct across its global operations and stakeholder ecosystem.

We also recognize that ethics, compliance, privacy, cybersecurity, digital trust, and responsible technology governance will continue to play an increasingly important role in shaping sustainable business operations, operational resilience, and stakeholder confidence.

Going forward, we will remain committed to:

- Strengthening ethics and compliance governance frameworks
- Expanding employee awareness and capability-building initiatives
- Enhancing monitoring, reporting, and oversight mechanisms
- Strengthening data privacy and cybersecurity practices
- Expanding digital trust and responsible technology initiatives
- Strengthening responsible AI governance practices
- Enhancing operational resilience and preparedness initiatives
- Aligning with evolving global standards, regulations, and governance best practices

We also intend to continue strengthening:

- Governance-led awareness and communication programs
- Cybersecurity and privacy awareness maturity
- Operational preparedness and resilience capabilities
- Ethics and compliance integration across supplier and partner ecosystems
- Responsible technology governance across emerging digital environments

Through these efforts, we aim to further reinforce a culture of integrity, accountability, transparency, responsible innovation, operational resilience, and ethical business conduct across the organization and its broader stakeholder ecosystem.



14. Sustainable Procurement and Responsible Supply Chain

14.1 Our Approach to Responsible Procurement

At SunTec Business Solutions, we recognize that our environmental, social, ethical, and governance responsibilities extend beyond our direct operations into the broader supplier and partner ecosystem. As a technology-driven organization operating across multiple geographies, digital ecosystems, and stakeholder networks, we understand that procurement decisions influence not only operational efficiency and business continuity, but also environmental stewardship, ethical governance, cybersecurity resilience, social impact, and long-term sustainability.

We believe that sustainable procurement is not merely a compliance requirement but an important strategic enabler that influences organizational resilience, stakeholder trust, responsible growth, and long-term value creation. As a technology company serving global customers across highly regulated industries, we recognize that supplier performance, governance maturity, cybersecurity resilience, privacy practices, operational reliability, and ethical business conduct directly influence organizational sustainability, customer trust, operational continuity, and long-term stakeholder value.

Our approach is guided by a simple belief:

“We are only as responsible as the ecosystem we enable.”

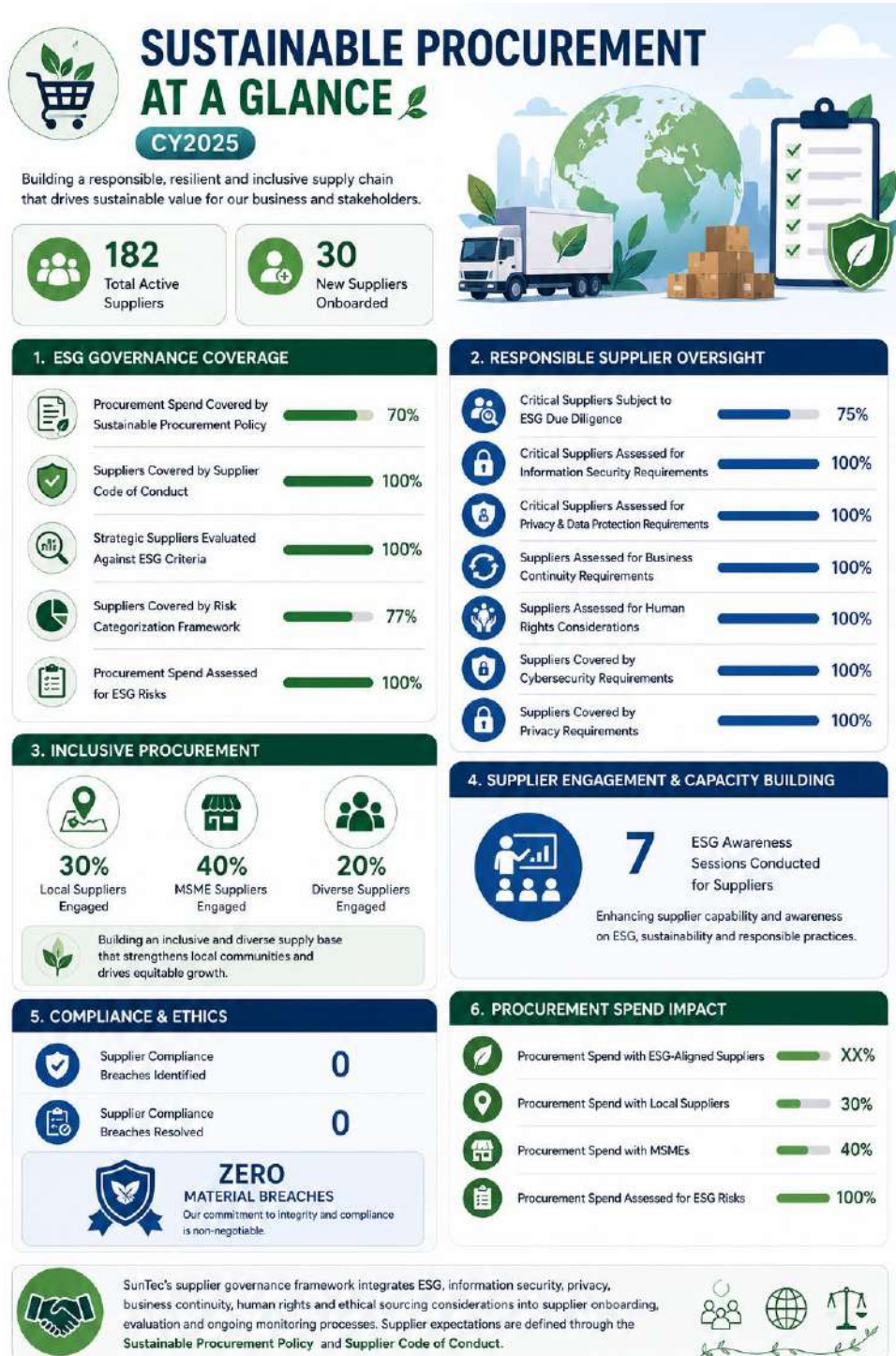
Accordingly, SunTec seeks to build a supply chain ecosystem that reflects our values of integrity, accountability, sustainability, inclusion, transparency, resilience, and responsible business conduct.

Our sustainable procurement philosophy is aligned with:

- Responsible sourcing principles
- ESG governance objectives
- Supplier accountability and transparency
- Circular economy and resource-efficiency practices
- Ethical and compliant procurement standards
- Responsible technology and cybersecurity governance
- Inclusive and diverse supplier engagement
- Data privacy and information protection requirements
- Operational resilience and business continuity priorities

- Long-term stakeholder value creation

14.2 Sustainable Procurement Performance Snapshot⁵⁰



⁵⁰ GRI 308-1

We continue to strengthen the measurement, monitoring, and reporting of supplier-related ESG indicators as part of its sustainable procurement maturity journey. While supplier ESG reporting capabilities continue to evolve, the organization is progressively expanding governance oversight, supplier transparency, ESG-linked performance evaluation, risk management practices, and procurement-related sustainability disclosures.

As our supplier governance capabilities continue to mature, we intend to progressively strengthen supplier ESG disclosures, due diligence coverage, supplier segmentation, sustainability-linked performance evaluation, supplier diversity reporting, and procurement-related ESG performance measurement.

The development of procurement-related ESG indicators reflects our commitment to increasing transparency, strengthening governance maturity, improving supplier accountability, and supporting long-term sustainable value creation across the supply chain ecosystem.

14.3 Governance and Integration

Sustainable procurement practices are integrated into our broader ESG governance framework and are supported through collaboration across procurement, legal, compliance, ESG, finance, administration, information security, human resources, and operational teams. This cross-functional approach is important because supplier-related decisions are not limited to commercial considerations alone. They can influence ethical conduct, environmental performance, human rights protection, information security, data privacy, business continuity, customer trust, and long-term operational resilience.

Our procurement governance model is therefore designed to ensure that sustainability considerations are progressively embedded into the way suppliers are identified, evaluated, onboarded, contracted, monitored, and reviewed. This helps the organization move from a transactional procurement model toward a more responsible, risk-aware, and sustainability-integrated supplier management approach.

Environmental, social, ethical, governance, cybersecurity, privacy, and resilience-related considerations are progressively embedded into vendor onboarding processes, procurement governance mechanisms, supplier evaluation and assessment criteria, contractual agreements, procurement decision-making, risk management, due diligence practices, vendor governance reviews, business continuity planning, information security assessments, privacy reviews, and supplier performance monitoring processes.

This integrated approach ensures that sustainability considerations are not treated as standalone requirements or post-facto compliance checks. Instead, they are increasingly becoming part of core sourcing decisions, supplier lifecycle management, operational resilience planning, cybersecurity oversight, data protection expectations, and responsible business governance.

The flow below outlines how ESG and responsible business considerations are integrated across our supplier lifecycle. This lifecycle-based view is important because it demonstrates

that how our sustainable procurement approach is not limited to policy commitments but is progressively embedded into practical decision points across procurement operations.

Sustainable Procurement Governance Model



Our procurement governance framework is supported through multiple policies, governance mechanisms, and operational controls that collectively strengthen responsible sourcing and supplier accountability. These policies provide the foundation for setting expectations, assigning responsibilities, guiding decision-making, and creating consistency across supplier engagement practices.

The following policy framework demonstrates how sustainable procurement at SunTec is connected to the organization’s wider ESG, ethics, privacy, cybersecurity, environmental, human rights, and resilience governance ecosystem. This is particularly important for a technology organization because supplier responsibility must cover not only environmental and labour-related expectations, but also digital trust, information protection, regulatory compliance, and operational continuity.

Governance Element Purpose

Sustainable Procurement Policy	Integrates ESG considerations into procurement decisions and establishes expectations for responsible sourcing, supplier
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	evaluation, environmental stewardship, social responsibility, and governance alignment.
<i>Supplier Code of Conduct</i>	Defines supplier expectations relating to ethics, labour standards, human rights, environmental responsibility, governance, compliance, data protection, and responsible business conduct.
<i>Supplier Diversity and Inclusion Policy</i>	Promotes inclusive and equitable supplier engagement by encouraging participation from diverse, local, MSME, and community-linked suppliers where feasible and commercially appropriate.
<i>ESG Policy</i>	Provides the overarching sustainability governance direction and connects procurement practices to SunTec’s broader environmental, social, governance, and stakeholder commitments.
<i>Human Rights Policy</i>	Reinforces SunTec’s expectations relating to dignity, non-discrimination, fair treatment, responsible employment, prevention of forced labour, prevention of child labour, and respect for human rights across the value chain.
<i>Environmental Policy</i>	Supports environmentally responsible procurement practices by encouraging resource efficiency, waste reduction, responsible consumption, pollution prevention, and supplier environmental awareness.
<i>Information Security Policy</i>	Establishes security expectations for relevant suppliers, particularly those handling information assets, digital systems, customer environments, technology infrastructure, or confidential data.
<i>Data Protection and Privacy Policy</i>	Supports privacy and data governance expectations for suppliers that process, access, store, or manage personal, customer, employee, operational, or sensitive business information.
<i>Applicable Laws and Compliance Policy</i>	Reinforces supplier obligations relating to legal compliance, regulatory alignment, ethical conduct, and adherence to applicable local and international requirements.
<i>Business Continuity Management Policy</i>	Supports operational resilience by setting expectations for continuity planning, disruption preparedness, incident response, and recovery capabilities for relevant suppliers.





<i>Green IT and Digital Sustainability Policy</i>	Encourages sustainable technology procurement, energy-efficient digital infrastructure, responsible IT asset management, cloud optimization, and digital resource efficiency.
<i>Circular Economy and Resource Efficiency Policy</i>	Supports lifecycle thinking, reuse, recycling, recovery, responsible disposal, circular procurement, and resource-efficiency principles across procurement and operations.

Together, these policies and governance models help create a structured governance foundation for responsible procurement. They also support a more mature approach to supplier management by ensuring that procurement decisions are aligned with our ESG priorities, customer expectations, regulatory responsibilities, cybersecurity obligations, and long-term sustainability objectives.

We continue to strengthen procurement governance maturity through ESG-linked supplier monitoring mechanisms, supplier categorization frameworks, procurement governance accountability structures, risk-based supplier oversight practices, supplier diversity and inclusion initiatives, procurement-related ESG reporting mechanisms, enhanced supplier transparency, governance reviews, ESG integration into supplier lifecycle management, cybersecurity and privacy oversight for relevant suppliers, and continuous improvement of procurement governance processes.

This evolution reflects our broader movement toward a more integrated, intelligence-driven, sustainability-aware, and resilience-focused procurement model. As the framework matures, the organization aims to strengthen supplier accountability, improve visibility into supply chain risks, expand ESG-linked supplier evaluation, increase responsible sourcing practices, and build long-term partnerships with suppliers that share our commitment to integrity, trust, resilience, inclusion, and sustainable value creation.

14.4 Supplier Code of Conduct

We have established a formal Supplier Code of Conduct as a foundational element of its sustainable procurement and responsible supply chain framework. The Code defines the organization’s expectations for suppliers, vendors, contractors, consultants, service providers, technology partners, and business partners across environmental, social, ethical, governance, labour, privacy, cybersecurity, and compliance dimensions.

For us, the Supplier Code of Conduct is not viewed only as a compliance document. It serves as a shared standard of responsible business behaviour across the supplier ecosystem. It communicates the values and expectations that we seek to uphold beyond its own operations and across the broader value chain. This is particularly important for a technology organization operating in regulated environments, where supplier conduct can influence customer trust, operational resilience, information security, data privacy, environmental performance, human rights protection, and long-term stakeholder value.





The Supplier Code reinforces our expectation that suppliers operate responsibly, comply with applicable laws and regulations, respect human rights, maintain ethical business practices, protect confidential information, support environmental responsibility, and demonstrate governance practices aligned with our broader ESG commitments.

The following table summarizes the key expectation areas covered under our supplier responsibility framework. These expectations provide the basis for supplier communication, onboarding, governance review, due diligence, engagement, and continuous improvement.

Supplier ESG Expectations

<i>Area</i>	<i>Expectations</i>
<i>Environmental Responsibility</i>	Suppliers are expected to support resource efficiency, waste reduction, environmental compliance, pollution prevention, responsible consumption, and sustainable operational practices.
<i>Labour Practices</i>	Suppliers are expected to promote fair wages, safe working conditions, employee wellbeing, responsible employment practices, and respect for worker rights.
<i>Human Rights</i>	Suppliers are expected to prohibit child labour, forced labour, human trafficking, discrimination, harassment, exploitation, and any practice that undermines human dignity.
<i>Diversity and Inclusion</i>	Suppliers are encouraged to promote equal opportunity, inclusive workplace practices, non-discrimination, and respectful treatment of employees and workers.
<i>Ethics and Governance</i>	Suppliers are expected to maintain anti-bribery, anti-corruption, transparency, integrity, accountability, and responsible business conduct practices.
<i>Privacy and Data Protection</i>	Suppliers that process, access, store, or handle personal or sensitive information are expected to protect such information and comply with applicable data protection requirements.
<i>Information Security</i>	Relevant suppliers are expected to maintain appropriate cybersecurity controls, secure information management practices, access safeguards, and incident preparedness.
<i>Business Continuity</i>	Suppliers supporting critical operations are expected to maintain resilience, continuity planning, disruption preparedness, and recovery capabilities.
<i>Responsible Technology</i>	Technology and digital service suppliers are expected to use digital technologies, automation, analytics, and AI-enabled capabilities responsibly and securely where applicable.



**Regulatory
Compliance**

Suppliers are expected to comply with applicable local, national, and international laws, regulations, contractual obligations, and customer-specific requirements.

14.5 Supplier Onboarding and Due Diligence

We recognize that responsible procurement begins well before a supplier is formally engaged. The supplier selection and onboarding stage represents an important governance checkpoint through which the organization can assess whether a supplier is aligned with our values, operational expectations, ethical standards, sustainability objectives, information security requirements, privacy obligations, and business continuity needs.

Accordingly, our supplier onboarding and due diligence approach is designed to assess not only commercial capability, cost competitiveness, delivery capacity, and service quality, but also broader responsible business considerations. These include ethical conduct, regulatory compliance, human rights practices, labour standards, environmental responsibility, cybersecurity controls, data privacy safeguards, operational resilience, and governance maturity.

This approach is particularly important for us because suppliers may support a wide range of activities, including technology services, professional services, facilities support, infrastructure, cloud-related services, administrative operations, consulting, contractor support, and other business-critical functions. Depending on the nature of the engagement, suppliers may influence customer trust, operational continuity, information security, regulatory compliance, environmental performance, and organizational reputation.

We therefore adopt a risk-aware and governance-driven approach to supplier onboarding. The objective is to ensure that supplier relationships are established with an appropriate level of review, transparency, accountability, and alignment with our ESG and responsible business commitments.

Supplier onboarding is progressively being strengthened as a lifecycle control mechanism. This means that the onboarding process is not treated as a one-time administrative formality, but as the starting point for responsible supplier governance. Information gathered during onboarding can support supplier categorization, risk assessment, contractual expectations, monitoring requirements, performance reviews, and future supplier engagement.

As part of supplier onboarding and evaluation activities, we progressively incorporate assessments relating to business legitimacy, legal compliance, financial stability, operational capability, ethical conduct, governance practices, human rights and labour standards, information security, cybersecurity controls, data privacy obligations, confidentiality requirements, business continuity preparedness, environmental stewardship, regulatory compliance, contractual obligations, technology governance, and digital risk management.



The depth and extent of due diligence may vary depending on the nature of the supplier relationship. A supplier providing routine administrative goods or services may require a different level of review compared to a technology supplier, cloud service provider, infrastructure partner, consultant, contractor, or service provider with access to confidential information, customer environments, systems, or business-critical operations.

This risk-based approach enables us to focus governance attention on suppliers that may present higher levels of operational, regulatory, cybersecurity, privacy, reputational, environmental, social, or governance-related risk.

The following table outlines the key due diligence focus areas considered within our supplier governance approach. These areas help ensure that supplier assessment is not limited to commercial suitability but also considers the wider risk and responsibility profile of the supplier.

Due Diligence Focus Areas

<i>Area Assessed</i>	<i>Governance Relevance</i>
<i>Governance Maturity</i>	Assesses whether the supplier has appropriate management systems, internal controls, accountability structures, policies, and oversight mechanisms to support responsible business conduct.
<i>Ethical Conduct</i>	Evaluates the supplier’s commitment to integrity, transparency, anti-bribery, anti-corruption, conflict-of-interest management, and responsible commercial behaviour.
<i>Regulatory Compliance</i>	Reviews the supplier’s ability and willingness to comply with applicable laws, regulations, contractual requirements, and industry-specific obligations relevant to the engagement.
<i>Human Rights Practices</i>	Considers whether the supplier demonstrates respect for human dignity, non-discrimination, prevention of forced labour, prevention of child labour, and responsible treatment of workers.
<i>Labour Standards</i>	Reviews employment practices, workplace conditions, worker safety, fair treatment, responsible working hours, grievance mechanisms, and employee welfare practices where applicable.
<i>Environmental Performance</i>	Considers the supplier’s approach to resource efficiency, waste management, environmental compliance, pollution prevention, responsible consumption, and sustainable operational practices.
<i>Information Security Controls</i>	Assesses whether relevant suppliers have appropriate controls to protect information assets, confidential data, systems, digital infrastructure, and customer-related information.
<i>Data Privacy Practices</i>	Reviews privacy safeguards, data protection practices, access controls, retention practices, and compliance with applicable privacy and confidentiality requirements where relevant.
<i>Business Continuity Preparedness</i>	Assesses whether critical suppliers have continuity planning, disruption preparedness, recovery arrangements, and resilience capabilities to support uninterrupted service delivery.





<i>Operational Resilience</i>	Evaluates the supplier’s ability to maintain service reliability, respond to disruptions, manage dependencies, and support SunTec’s operational continuity requirements.
<i>Technology Governance</i>	Considers technology management practices, secure development or service delivery approaches, cloud or infrastructure governance, and responsible use of digital systems where applicable.
<i>Financial Stability</i>	Reviews the supplier’s financial soundness, continuity risk, and ability to sustain delivery commitments over the duration of the engagement.
<i>Reputational Risk</i>	Considers whether the supplier’s conduct, market reputation, public record, governance issues, or past controversies may create reputational exposure for SunTec.

This evolving approach supports SunTec’s broader objective of building a supplier ecosystem that is responsible, secure, resilient, transparent, compliant, and aligned with the organization’s long-term ESG and business sustainability priorities.

14.6 Supplier Segmentation and Risk Based Oversight

We recognize that not all suppliers carry the same level of business, operational, sustainability, cybersecurity, privacy, regulatory, or continuity risk. A supplier providing routine office materials, for example, may not require the same level of governance attention as a technology service provider, cloud partner, infrastructure vendor, consultant, contractor, or supplier with access to customer environments, confidential information, or business-critical operations.

For this reason, we are progressively strengthening a supplier segmentation and risk-based oversight approach. This enables the organization to assess suppliers based on their strategic importance, operational criticality, nature of services, access to information assets, dependency levels, sustainability impact, regulatory exposure, and potential effect on business continuity.

Supplier segmentation is an important step in moving from a uniform procurement approach to a more mature governance model. It helps ensure that suppliers with higher potential impact are subject to proportionate due diligence, closer monitoring, stronger contractual safeguards, cybersecurity and privacy expectations, continuity requirements, and performance reviews. At the same time, it allows standard suppliers to be managed through appropriate, efficient, and practical governance mechanisms.

A risk-based supplier management approach enables SunTec to allocate oversight resources more effectively while strengthening resilience across the supply chain ecosystem. It also supports more informed procurement decision-making by helping the organization identify where additional controls, engagement, remediation, or monitoring may be required.

The following framework outlines the broad supplier categories that SunTec uses or intends to strengthen as part of its evolving responsible supply chain governance model.





<i>Supplier Category</i>	<i>Description</i>
<i>Strategic Suppliers</i>	Suppliers that are important to SunTec’s long-term business objectives, strategic initiatives, customer commitments, or major operational priorities. These suppliers may require closer engagement, governance review, performance monitoring, and long-term relationship management.
<i>Critical Suppliers</i>	Suppliers whose products or services are essential for operational continuity, service delivery, customer commitments, infrastructure support, or business-critical processes. These suppliers may be subject to enhanced oversight, continuity expectations, and risk-based reviews.
<i>High-Risk Suppliers</i>	Suppliers that may present elevated ESG, cybersecurity, privacy, compliance, environmental, labour, reputational, or operational risks. These suppliers may require enhanced due diligence, remediation tracking, contractual safeguards, or escalation mechanisms.
<i>Technology Suppliers</i>	Providers of software, infrastructure, cloud, cybersecurity, development, digital, data-processing, or technology-enabled services. These suppliers are particularly relevant from an information security, privacy, business continuity, and responsible technology perspective.
<i>Standard Suppliers</i>	Suppliers providing routine operational products or services with limited risk exposure. These suppliers continue to be governed through standard procurement, compliance, and performance expectations.
<i>Local Suppliers</i>	Suppliers operating within local and regional markets. Engagement with such suppliers can support responsiveness, regional resilience, local economic participation, and community-linked value creation.
<i>MSME Suppliers</i>	Small and medium enterprises that contribute to innovation, economic development, supplier diversity, and inclusive growth. SunTec seeks to support qualified MSME participation where feasible and commercially appropriate.

Supplier segmentation also supports the identification of key risk areas that may require monitoring or mitigation. These risks may differ based on supplier type, geography, service category, contractual exposure, data access, operational dependency, and ESG relevance.

The following risk areas form part of SunTec’s evolving supplier oversight lens.

<i>Risk Area</i>	<i>Relevance to Supplier Oversight</i>
<i>Ethics and Compliance Risk</i>	Relates to bribery, corruption, fraud, conflicts of interest, legal non-compliance, regulatory exposure, or unethical business conduct.
<i>Human Rights Risk</i>	Relates to child labour, forced labour, human trafficking, discrimination, harassment, exploitation, or practices that undermine worker dignity.
<i>Labour Practice Risk</i>	Relates to unsafe working conditions, unfair wages, excessive working hours, lack of grievance channels, or poor employment practices.
<i>Environmental Risk</i>	Relates to resource consumption, waste generation, pollution, hazardous materials, regulatory non-compliance, or weak environmental management practices.





<i>Cybersecurity Risk</i>	Relates to inadequate protection of systems, networks, customer environments, confidential information, or digital infrastructure.
<i>Privacy Risk</i>	Relates to improper handling of personal data, inadequate privacy safeguards, unauthorized processing, data retention issues, or confidentiality weaknesses.
<i>Technology Risk</i>	Relates to software reliability, cloud governance, infrastructure dependency, responsible technology use, secure development practices, or emerging technology risks.
<i>Operational Risk</i>	Relates to service failures, quality issues, delivery delays, process weaknesses, or disruption to operational workflows.
<i>Business Continuity Risk</i>	Relates to supplier preparedness for disruptions, recovery capabilities, dependency concentration, and continuity of critical services.
<i>Financial Risk</i>	Relates to the supplier's financial stability, ability to sustain delivery, continuity of operations, and long-term viability.
<i>Reputational Risk</i>	Relates to supplier controversies, public allegations, poor governance history, ESG incidents, or conduct that may affect SunTec's stakeholder trust.
<i>Regulatory Risk</i>	Relates to non-compliance with applicable laws, contractual requirements, data protection obligations, labour rules, environmental regulations, or industry expectations.
<i>Third-Party Dependency Risk</i>	Relates to excessive dependency on a supplier or the supplier's own subcontractors, partners, platforms, or service providers.

Supplier oversight activities are determined based on the nature and risk profile of the supplier relationship. These activities may include periodic supplier reviews, governance assessments, information security evaluations, privacy and confidentiality reviews, contractual compliance monitoring, business continuity assessments, supplier performance reviews, risk-based escalation, remediation follow-up, and management review discussions where appropriate.

We continue to enhance supplier segmentation capabilities and strengthen governance mechanisms that support proactive identification, monitoring, and mitigation of supplier-related risks. As this framework matures, the organization aims to improve visibility into supplier risk, expand ESG-linked supplier assessment, strengthen documentation of oversight activities, and increase the effectiveness of supplier monitoring and engagement.

14.7 Supplier Engagement and Capability Building

We believe that sustainable procurement cannot be achieved through policies, contracts, and compliance monitoring alone. Meaningful and lasting progress requires supplier engagement, awareness building, mutual accountability, and long-term collaboration. Suppliers are an important part of our extended business ecosystem, and their maturity directly influences our ability to strengthen resilience, trust, ESG performance, operational continuity, and stakeholder value.





Supplier engagement plays an important role in converting expectations into practice. While policies define what we expect, engagement helps suppliers understand why those expectations matter and how they can contribute to stronger business outcomes. It also allows us to communicate evolving priorities relating to responsible sourcing, human rights, labour practices, data privacy, information security, environmental stewardship, circularity, business continuity, responsible technology, and ethical conduct.

This engagement-based approach is especially important in areas where supplier maturity may vary. Some suppliers may already have advanced ESG, cybersecurity, or governance systems, while others may be at an earlier stage of development. By encouraging awareness and dialogue, SunTec seeks to support progressive improvement across the supplier ecosystem.

The following development priorities guide SunTec’s supplier capability-building approach.

Supplier Development Priorities

<i>Focus Area</i>	<i>Capability-Building Objective</i>
<i>ESG Awareness and Maturity Building</i>	Strengthen supplier understanding of environmental, social, and governance expectations and encourage progressive alignment with responsible business practices.
<i>Ethical Business Conduct</i>	Reinforce expectations relating to integrity, transparency, anti-bribery, anti-corruption, fair competition, conflict-of-interest management, and responsible commercial behaviour.
<i>Human Rights Awareness</i>	Encourage respect for human dignity, non-discrimination, prevention of child labour, prevention of forced labour, fair treatment, and worker protection across supplier operations.
<i>Labour Practice Expectations</i>	Promote safe working conditions, responsible employment practices, worker wellbeing, appropriate grievance mechanisms, and respect for applicable labour standards.
<i>Information Security Awareness</i>	Communicate expectations relating to secure information handling, access controls, confidentiality, system protection, and protection of customer and business information.
<i>Privacy and Data Protection</i>	Reinforce responsible handling of personal, customer, employee, operational, and sensitive information in line with applicable privacy and data protection obligations.
<i>Responsible Technology Governance</i>	Encourage secure, ethical, and accountable use of digital systems, technology services, cloud platforms, automation, analytics, and AI-enabled capabilities where applicable.
<i>Sustainability Reporting Awareness</i>	Encourage suppliers to improve their ability to track and communicate relevant sustainability practices, risk controls, and performance information over time.
<i>Operational Resilience</i>	Strengthen supplier preparedness to manage disruptions, delivery risks, dependencies, incidents, and service continuity challenges.
<i>Business Continuity Preparedness</i>	Encourage critical suppliers to maintain continuity plans, recovery arrangements, escalation processes, and resilience mechanisms appropriate to their role.





<i>Environmental Stewardship</i>	Promote resource efficiency, waste reduction, responsible disposal, recycling, energy efficiency, and environmentally responsible operating practices.
<i>Governance and Compliance</i>	Strengthen supplier accountability through policies, internal controls, compliance processes, documentation, reviews, and management oversight.

Through these engagement activities, we seek to strengthen supplier understanding of sustainability expectations while creating opportunities for continuous improvement, innovation, transparency, and responsible business practices across the value chain.

Together, supplier segmentation and supplier engagement create a more balanced governance model. Segmentation helps us identify where stronger oversight is required, while engagement helps suppliers move toward higher levels of maturity. This combined approach supports a responsible supply chain ecosystem that is not only compliant, but also collaborative, resilient, transparent, and future-ready.

14.8 Sustainable and Inclusive Sourcing

We recognize that procurement has the potential to create value beyond the purchase of goods and services. When designed responsibly, procurement can support local economic development, strengthen supplier ecosystems, promote entrepreneurship, encourage innovation, improve supply chain resilience, and contribute to broader social and community outcomes.

For us, sustainable and inclusive sourcing is therefore an important part of responsible business conduct. The organization seeks to ensure that procurement practices are guided not only by quality, cost, capability, and service delivery, but also by fairness, transparency, inclusion, sustainability, and long-term value creation.

This approach reflects our belief that a responsible supply chain should be both resilient and inclusive. A resilient supply chain enables continuity, flexibility, and reliability. An inclusive supply chain creates opportunities for diverse, local, MSME, and community-linked suppliers to participate in economic growth. Together, these priorities help create a supplier ecosystem that is more agile, participative, responsible, and aligned with the organization’s ESG objectives.

Our Supplier Diversity and Inclusion Policy support this direction by promoting equitable supplier engagement practices and encouraging diversity within the supply chain ecosystem. The policy reinforces the organization’s intention to provide fair and transparent access to procurement opportunities while encouraging participation from qualified local suppliers, small and medium enterprises, diverse businesses, and community-linked enterprises wherever feasible and commercially appropriate.

Inclusive sourcing at SunTec is not positioned as a separate social initiative. It is being progressively integrated into the broader procurement governance framework so that supplier diversity, local sourcing, MSME participation, ethical supplier selection, and sustainable economic participation become part of responsible sourcing decisions.





The following framework outlines the key priorities that guide SunTec’s sustainable and inclusive sourcing approach.

<i>Focus Area</i>	<i>Strategic Relevance</i>
<i>Local Supplier Engagement</i>	Supports regional economic participation, strengthens local supplier ecosystems, improves responsiveness, and can reduce logistics-related dependencies where feasible.
<i>MSME Participation</i>	Encourages participation from small and medium enterprises that contribute to innovation, employment generation, entrepreneurship, and economic resilience.
<i>Supplier Diversity</i>	Promotes broader participation from diverse supplier groups and supports a more inclusive supply chain ecosystem.
<i>Inclusive Procurement Practices</i>	Helps ensure that procurement opportunities are accessible, transparent, fair, and aligned with responsible business principles.
<i>Transparent Supplier Selection</i>	Reinforces fairness, accountability, consistency, and merit-based decision-making across supplier evaluation and engagement.
<i>Equal Opportunity Access</i>	Encourages qualified suppliers to participate in procurement processes without discrimination or unfair barriers.
<i>Community-Based Procurement</i>	Supports opportunities to engage suppliers that are connected to local communities and regional economic development.
<i>Long-Term Supplier Development</i>	Encourages relationship-building with suppliers that can mature alongside SunTec’s quality, governance, ESG, and business expectations.
<i>Responsible Economic Participation</i>	Connects procurement decisions with broader social and economic value creation.
<i>Sustainable Community Impact</i>	Supports procurement practices that contribute to local prosperity, resilience, and inclusive growth.

Supporting Local Economies

We recognize that local sourcing can play an important role in strengthening regional resilience and community-linked economic development. Wherever feasible and commercially appropriate, the organization seeks to engage local suppliers and service providers for relevant goods and services.

Local supplier engagement can contribute to multiple forms of value. It can improve responsiveness and flexibility, reduce dependency on distant supplier networks, support regional employment, strengthen relationships with operating communities, and contribute to local entrepreneurship. In certain cases, local sourcing may also help reduce transportation-related impacts and improve the agility of service delivery.



For us, supporting local economies does not mean compromising on quality, compliance, ethics, information security, or sustainability expectations. Local suppliers are expected to meet relevant procurement, governance, service, quality, and compliance requirements. The objective is to create a balanced approach where local participation is encouraged while maintaining responsible sourcing standards and business requirements.

This approach helps us contribute to economic value creation within the communities in which it operates while also improving supply chain flexibility and regional responsiveness.

Supporting MSMEs and Emerging Enterprises

Small and medium enterprises play a significant role in economic development, innovation, employment generation, and community growth. They often bring agility, specialized capabilities, localized knowledge, cost responsiveness, and entrepreneurial thinking to the supplier ecosystem.

We recognize the importance of creating opportunities for qualified MSMEs and emerging enterprises to participate in procurement processes where appropriate. By enabling MSME participation, we contribute to broader economic inclusion while also benefiting from supplier innovation, flexibility, responsiveness, and localized expertise.

MSME engagement also supports the diversification of the supplier base. A more diverse supplier ecosystem can reduce concentration risk, improve resilience, expand available capabilities, and encourage competitive and innovative sourcing options. As our procurement maturity evolves, MSME participation will continue to be an important element of the organization's inclusive sourcing approach.

At the same time, MSME suppliers are encouraged to align with our responsible procurement expectations, including ethical conduct, compliance, labour standards, environmental responsibility, information security, data privacy, and business continuity requirements where relevant. This allows us to support inclusive participation while maintaining responsible governance across the supplier ecosystem.

Supplier Diversity and Equitable Opportunity

Supplier diversity is an important part of our broader commitment to inclusion and responsible business conduct. The organization recognizes that diverse suppliers can contribute to innovation, community development, market responsiveness, and social value creation.

We seek to encourage equitable access to procurement opportunities by promoting transparent supplier selection, merit-based evaluation, non-discriminatory engagement practices, and fair consideration of qualified suppliers. This approach supports the development of a supplier ecosystem that is more representative, inclusive, and aligned with the organization's ESG values.

Inclusive sourcing also helps reinforce trust with stakeholders. Customers, employees, communities, and partners increasingly expect organizations to demonstrate that business decisions contribute positively to society. By strengthening supplier diversity and equitable

sourcing practices, we can create broader shared value while reinforcing its role as a responsible technology organization.

Community-Linked Procurement and Shared Value

Our sustainable procurement philosophy extends beyond transactional supplier relationships. The organization seeks to foster long-term partnerships that create value for both our organization and for our stakeholders. Community-linked procurement is one way in which procurement can contribute to social and economic outcomes beyond direct business needs.

Where relevant, procurement decisions can support community-based suppliers, local service providers, regional enterprises, and businesses that contribute to employment, entrepreneurship, and community resilience. This creates a bridge between business operations and social impact, enabling procurement to become part of our broader ESG and community engagement ecosystem.

The shared value approach recognizes that a strong supplier ecosystem benefits both the organization and society. Suppliers gain opportunities for business growth and capability development, while SunTec benefits from responsive, innovative, resilient, and locally connected partners.

Strengthening Inclusive Sourcing Maturity

We recognize that sustainable and inclusive sourcing is an evolving area of procurement maturity. As we continue to strengthen its ESG and supplier governance frameworks, it intends to improve visibility into local supplier participation, MSME engagement, supplier diversity, responsible sourcing practices, and supplier development opportunities.

Future maturity priorities include strengthening supplier diversity metrics, expanding local sourcing visibility, improving procurement data on MSME participation, enhancing supplier inclusion programs, and deepening engagement with responsible supplier ecosystems aligned with our broader ESG objectives.

Through sustainable and inclusive sourcing, we aim to contribute positively to economic development while strengthening resilience, innovation, sustainability, and accountability throughout its supply chain ecosystem.

This approach supports the organization's broader transition from transactional procurement to responsible ecosystem partnership — where suppliers are not only vendors, but contributors to sustainable growth, community value, operational resilience, and long-term stakeholder trust.

14.9 Green Procurement and Circular Economy Integration

We recognize that procurement decisions have a direct influence on environmental performance, resource consumption, waste generation, technology lifecycle impacts, operational efficiency, and long-term sustainability outcomes. As a technology-led organization, the environmental footprint of procurement is not limited to office supplies or facility operations. It also includes technology infrastructure, IT assets, digital platforms, cloud



usage, hardware lifecycle management, e-waste, vendor practices, and the broader resource intensity of business operations.

For this reason, our environmental procurement approach is designed to progressively integrate sustainability considerations into sourcing decisions, supplier evaluation, technology investments, infrastructure procurement, asset lifecycle planning, operational purchasing, and supplier engagement. The objective is to ensure that procurement becomes an enabler of environmental responsibility, rather than a purely transactional function focused only on price, availability, and delivery.

This approach reflects our broader ESG commitment to responsible resource use, operational efficiency, waste reduction, climate awareness, circularity, and sustainable digital transformation. By embedding environmental considerations into procurement, we seek to reduce avoidable resource consumption, improve lifecycle value, strengthen environmental accountability, encourage responsible supplier practices, and support the transition toward a more circular and sustainable operating model.

Green procurement at SunTec is therefore viewed across three interconnected dimensions. The first is **responsible sourcing**, where environmental considerations are progressively included in the selection and evaluation of products, services, suppliers, and infrastructure. The second is **resource-efficient operations**, where procurement choices support reduced consumption of energy, water, paper, materials, and other resources. The third is **circular lifecycle management**, where assets are managed with greater attention to reuse, repair, refurbishment, recycling, recovery, and responsible disposal.

This integrated approach enables SunTec to connect procurement with its wider environmental goals, including Green IT, digital sustainability, e-waste governance, circular economy practices, sustainable infrastructure, and supplier environmental responsibility.

<i>Focus Area</i>	<i>Environmental Relevance</i>
<i>Sustainable IT Procurement</i>	Supports the selection of technology assets, infrastructure, and digital solutions that contribute to efficiency, reliability, lifecycle value, and responsible resource use.
<i>Energy-Efficient Infrastructure</i>	Encourages procurement choices that support reduced energy consumption across facilities, technology infrastructure, equipment, and operational environments.
<i>Circular Procurement</i>	Integrates lifecycle thinking into purchasing decisions by considering durability, reuse potential, repairability, recyclability, take-back options, and responsible disposal pathways.
<i>Lifecycle Management</i>	Ensures that assets are not viewed only at the point of purchase, but across their full lifecycle from acquisition and use to maintenance, reuse, retirement, recycling, or disposal.
<i>Green IT Practices</i>	Connects technology procurement with energy efficiency, cloud optimization, digital resource efficiency, responsible hardware usage, and reduced environmental impact.





<i>E-Waste Management</i>	Supports responsible handling of obsolete or end-of-life electronic equipment through authorized recyclers and controlled disposal processes.
<i>Resource Efficiency</i>	Encourages procurement decisions that reduce unnecessary consumption of materials, energy, water, paper, and consumables across operations.
<i>Recycling and Recovery</i>	Promotes recovery of value from materials and assets through recycling, reuse, refurbishment, and responsible waste management channels.
<i>Cloud Optimization</i>	Supports efficient use of cloud and digital infrastructure, helping reduce duplication, idle capacity, unnecessary hardware dependency, and technology-related resource intensity.
<i>Sustainable Office Procurement</i>	Encourages responsible choices in office supplies, consumables, equipment, facility materials, and services where feasible.
<i>Supplier Environmental Performance</i>	Encourages suppliers to demonstrate responsible environmental practices, compliance, resource efficiency, and waste reduction measures relevant to their operations.
<i>Responsible Resource Consumption</i>	Reinforces the principle that procurement decisions should support efficiency, avoid waste, and contribute to long-term environmental stewardship.

The environmental procurement priorities above help us translate its ESG intent into practical sourcing and lifecycle decisions. They also provide a framework for progressively strengthening supplier discussions, procurement reviews, and internal purchasing practices from an environmental perspective.

Policy and Governance Foundation

Our environmental procurement approach is supported by a broader policy and governance ecosystem. The Sustainable Procurement Policy provides the foundation for integrating ESG considerations into procurement decisions, while the Environmental Policy reinforces the organization’s commitment to resource efficiency, waste reduction, environmental compliance, and sustainable operations.

The Supplier Code of Conduct extends environmental expectations to suppliers by encouraging responsible resource use, waste reduction, environmental compliance, pollution prevention, and sustainable operating practices. The ESG Policy provides the overarching governance direction, ensuring that environmental procurement is aligned with our broader sustainability objectives.

In addition, Green IT and Digital Sustainability principles are increasingly relevant to our operating model, given the organization’s dependence on technology infrastructure, digital platforms, cloud environments, and IT assets. Circular Economy and Resource Efficiency principles further strengthen the organization’s ability to consider asset lifecycles, reuse, recycling, recovery, and responsible disposal in procurement decisions.



Together, these policies and governance mechanisms help ensure that environmental considerations are embedded not only in operational sustainability programs, but also in purchasing decisions, supplier expectations, technology lifecycle management, and long-term infrastructure planning.

Green IT and Digital Sustainability

As a technology company, we recognize that digital operations have environmental implications. Technology infrastructure, hardware procurement, cloud usage, data storage, digital processing, and IT asset lifecycle management can all influence energy consumption, material use, e-waste generation, and long-term environmental impact.

Accordingly, we seek to incorporate Green IT principles into technology procurement and lifecycle management practices. This includes encouraging energy-efficient technology infrastructure, optimizing the use of cloud and digital infrastructure, reducing unnecessary hardware consumption, and strengthening responsible IT asset management.

Green IT also supports a broader shift from physical, manual, and resource-intensive processes toward digital, automated, and efficient operating models. By enabling digital workflows, cloud readiness, virtualization, secure remote working capabilities, and optimized infrastructure use, SunTec can improve operational efficiency while reducing avoidable resource consumption.

The organization's Green IT approach also connects to product responsibility and digital sustainability. Product modernization, cloud-ready platforms, efficient architecture, secure digital operations, and responsible technology lifecycle management can support both customer value and environmental efficiency. This is particularly relevant for us as a provider of digital platforms that enable customers to modernize operations, reduce manual processes, and operate more efficiently across complex business environments.

Responsible IT Asset Lifecycle Management

IT asset lifecycle management is an important part of our circular economy and environmental procurement approach. Technology assets such as laptops, servers, network equipment, peripherals, storage devices, and other electronic equipment carry environmental impacts across procurement, usage, maintenance, replacement, and end-of-life stages.

We therefore seek to manage IT assets with attention to durability, efficient utilization, responsible replacement cycles, secure retirement, reuse or refurbishment opportunities where appropriate, and environmentally responsible disposal of obsolete equipment. This approach supports both environmental responsibility and information security, as retired assets must be handled in ways that protect data, confidentiality, and system integrity while also ensuring responsible e-waste management.

Where electronic assets reach end-of-life, we aim to route e-waste through authorized and responsible disposal or recycling channels. This helps reduce the risk of improper disposal, environmental contamination, unmanaged waste streams, and data security exposure.

Responsible IT asset lifecycle management therefore sits at the intersection of environmental stewardship, cybersecurity, data protection, operational efficiency, and circular economy practices.

Circular Economy Integration

We support circular economy principles that seek to maximize resource value, extend asset lifecycles, minimize waste generation, and encourage reuse, recovery, refurbishment, recycling, and responsible disposal. Circularity helps shift procurement thinking away from a linear “buy-use-dispose” model toward a more responsible lifecycle-based approach.

In practical terms, this means considering not only the upfront cost or immediate utility of a product or service, but also its durability, maintenance needs, efficiency, upgradeability, end-of-life pathway, potential for reuse, and environmental impact. This approach can be applied across technology procurement, office equipment, consumables, facility materials, infrastructure assets, and supplier-managed services.

Circular economy integration also encourages the organization to identify opportunities for waste prevention before disposal becomes necessary. This includes reducing unnecessary purchases, improving utilization of existing assets, extending product lifecycles, reusing or refurbishing equipment where feasible, and improving recycling and recovery pathways.

As our environmental procurement maturity evolves, circular economy principles will play a growing role in procurement planning, supplier engagement, IT asset management, e-waste governance, and sustainable operations.

Supplier Environmental Responsibility

We recognize that supplier practices can influence the environmental impact of its broader value chain. Suppliers may contribute to environmental outcomes through their use of materials, energy, water, packaging, transportation, waste management practices, and compliance with environmental regulations.

Through its Supplier Code of Conduct and Sustainable Procurement Policy, we encourage suppliers to adopt responsible environmental practices relevant to their operations. This includes efficient use of resources, reduction of waste, responsible disposal, compliance with environmental laws, safe handling of hazardous substances where applicable, and continuous improvement of environmental performance.

For suppliers providing technology, infrastructure, facility, logistics, or operational services, environmental expectations may also include responsible asset management, energy-efficient solutions, e-waste handling, reduced material wastage, and improved lifecycle practices.

This supplier-focused approach helps us extend environmental responsibility beyond its direct operations and into the broader procurement ecosystem.

Environmental Procurement as a Long-Term Maturity Journey

We recognize that green procurement and circular economy integration are evolving areas of ESG maturity. While foundational practices are being strengthened, the organization intends to progressively improve data visibility, supplier engagement, internal procurement criteria, and performance tracking related to environmental procurement.

Future areas of focus include strengthening green procurement criteria, improving visibility into environmentally preferred purchases, expanding e-waste and lifecycle tracking, enhancing supplier environmental assessment, encouraging responsible technology procurement, strengthening circular procurement practices, and improving reporting on resource efficiency outcomes.

Through these initiatives, we seek to make procurement an active contributor to environmental stewardship. Our long-term ambition is to ensure that procurement decisions support not only operational efficiency and business needs, but also lower environmental impact, responsible resource consumption, circular value creation, supplier accountability, and sustainable growth.

By integrating green procurement, Green IT, circular economy principles, asset lifecycle management, and supplier environmental responsibility, SunTec is strengthening the connection between procurement governance and its broader ESG strategy.

14.10 Supply Chain Cybersecurity, Privacy and Digital Trust

As a technology organization serving global customers across highly regulated industries, we recognize that supply chain risks extend far beyond traditional procurement considerations such as cost, quality, availability, and delivery. In a digitally connected business environment, suppliers can influence not only operational performance, but also information security, customer privacy, regulatory compliance, business continuity, cyber resilience, and long-term stakeholder trust.

This is particularly important for us because the organization operates in technology ecosystems where customer information, financial data, transaction-related processes, digital infrastructure, and platform reliability are business-critical. Suppliers that support software, infrastructure, cloud services, professional services, facilities, operations, consulting, managed services, or customer-facing delivery may have varying levels of access to systems, information, environments, or processes that require strong governance.

We therefore view cybersecurity, privacy, information protection, digital resilience, and technology governance as integral parts of responsible supplier management. These themes are not treated as separate technology concerns alone; they are increasingly embedded into supplier evaluation, onboarding, contracting, risk assessment, monitoring, and ongoing supplier engagement.

The objective is to ensure that third-party relationships support a trusted, secure, resilient, and compliant operating ecosystem. This approach helps us protect customer information, safeguard confidential business data, strengthen operational continuity, comply with applicable privacy and security requirements, and maintain the trust of customers operating in regulated markets.



Digital Trust as a Supplier Governance Priority

Digital trust is built when stakeholders have confidence that information is protected, systems are secure, services are resilient, data is processed responsibly, and technology is governed ethically. For us, this trust must extend across the supplier ecosystem because suppliers may contribute to service delivery, infrastructure support, technology operations, business processes, or customer-related activities.

Accordingly, relevant suppliers are expected to demonstrate governance maturity in areas such as information security, data privacy, confidentiality, access control, cyber risk management, incident preparedness, business continuity, operational resilience, and regulatory compliance. The depth of these expectations may vary based on the nature of the supplier engagement, the sensitivity of information involved, the criticality of services provided, and the level of access granted to SunTec systems, customer environments, or business information.

The following framework summarizes the key digital trust expectations that guide us supplier governance approach.

<i>Area</i>	<i>Governance Expectation</i>
<i>Cybersecurity</i>	Suppliers are expected to maintain controls that protect against cyber threats, unauthorized access, malicious activity, system compromise, and technology-related disruptions.
<i>Privacy</i>	Suppliers that process, access, store, or manage personal information are expected to protect such information and comply with applicable data protection and privacy requirements.
<i>Information Security</i>	Relevant suppliers are expected to maintain appropriate security controls, governance practices, access safeguards, and information protection mechanisms.
<i>Confidentiality</i>	Suppliers are expected to securely handle customer, employee, operational, proprietary, contractual, and business-sensitive information entrusted to them.
<i>Business Continuity</i>	Critical suppliers are expected to maintain continuity planning, recovery arrangements, escalation processes, and disruption management capabilities appropriate to their role.
<i>Operational Resilience</i>	Suppliers are expected to demonstrate preparedness to manage incidents, disruptions, service interruptions, dependency risks, and operational failures.
<i>Technology Governance</i>	Technology suppliers are expected to use digital systems, platforms, cloud environments, automation, and emerging technologies responsibly and securely.
<i>Regulatory Compliance</i>	Suppliers are expected to comply with applicable privacy, cybersecurity, contractual, industry-specific, and regulatory requirements relevant to their services.

Privacy and Data Protection Across Third-Party Relationships

We are committed to protecting personal information and maintaining responsible data governance practices across its operations and supplier ecosystem. This responsibility



becomes especially important where suppliers process, access, transmit, store, support, or manage personal, customer, employee, operational, financial, or sensitive business information.

Suppliers handling such information are expected to maintain appropriate privacy and data protection safeguards. These may include role-based access controls, confidentiality obligations, secure data handling practices, defined processing purposes, appropriate retention controls, protection of data integrity, and timely reporting of privacy or security incidents in accordance with contractual obligations.

Our approach to supplier privacy governance is aligned with the organization's broader privacy and data protection commitments. As a global technology company, we recognize the importance of regulatory alignment across multiple jurisdictions, including privacy frameworks such as GDPR, UK and European data protection requirements, GLBA, PDPA, UAE data protection expectations, and India's Digital Personal Data Protection framework where applicable.

By extending privacy expectations to suppliers, we seek to reduce the risk of unauthorized access, inappropriate processing, confidentiality breaches, data leakage, regulatory exposure, and customer trust erosion. This reinforces the organization's commitment to responsible data handling across the full value chain.

Cybersecurity Resilience in the Supplier Ecosystem

The cyber threat landscape continues to evolve rapidly, with third-party relationships increasingly becoming a critical area of risk for organizations globally. We recognize that supply chain cybersecurity is an important dimension of operational resilience, particularly in technology-enabled and regulated customer environments.

Relevant suppliers may be expected to demonstrate cybersecurity practices that are appropriate to the nature and criticality of their engagement. These may include secure access management, endpoint protection, vulnerability management, secure configuration, incident response preparedness, protection against phishing and malware, monitoring mechanisms, and controls to protect confidential information and digital systems.

For suppliers that support technology infrastructure, software development, cloud services, customer environments, or operational platforms, cybersecurity expectations may be more extensive. Such suppliers may be subject to additional governance requirements relating to secure technology deployment, access control, confidentiality, incident notification, business continuity, and operational resilience.

Our supplier cybersecurity approach is designed to strengthen the security posture of the broader operating ecosystem. It helps ensure that supplier relationships do not create unmanaged vulnerabilities, weak control points, or resilience gaps that could affect customer trust, business continuity, or regulatory confidence.

Business Continuity and Operational Resilience

Supplier resilience is an important part of our broader business continuity and operational risk management approach. Disruptions involving suppliers can affect service delivery, operational timelines, customer commitments, infrastructure support, facilities, technology availability, or business processes.

We therefore expect critical and relevant suppliers to demonstrate appropriate continuity preparedness based on the nature of the services they provide. This may include business continuity planning, incident escalation mechanisms, recovery arrangements, service continuity commitments, dependency management, and communication protocols during disruptions.

Operational resilience is especially important for suppliers supporting technology systems, cloud services, infrastructure, customer environments, managed services, or business-critical support functions. By integrating resilience expectations into supplier governance, SunTec strengthens its ability to maintain continuity, respond to disruptions, and protect stakeholder confidence.

Responsible Technology and Emerging Digital Risk

As digital ecosystems continue to evolve, supplier governance must also consider responsible technology use. Suppliers supporting digital systems, automation, analytics, cloud platforms, AI-enabled capabilities, software development, or technology services are expected to use such technologies responsibly, securely, and in alignment with applicable obligations.

This includes protecting data, maintaining confidentiality, avoiding unauthorized use of information, applying appropriate security controls, and ensuring that emerging technologies do not create unmanaged privacy, cybersecurity, ethical, or operational risks.

Our responsible technology expectations for suppliers align with its broader approach to digital trust, responsible AI awareness, secure technology usage, privacy-by-design thinking, and ethical digital transformation.

Integration with Supplier Risk Management

Cybersecurity, privacy, information security, and business continuity considerations are progressively integrated into our broader supplier risk management approach. Depending on supplier criticality and risk exposure, supplier reviews may consider security governance, privacy safeguards, confidentiality controls, contractual obligations, technology risk, regulatory requirements, continuity preparedness, and incident response capabilities.

This integrated approach enables us to evaluate supplier relationships through a broader risk lens. It also helps ensure that suppliers with access to sensitive information, customer environments, critical systems, digital infrastructure, or business-critical processes are subject to appropriate oversight.

Where gaps or areas of improvement are identified, we may engage suppliers through clarification, remediation discussions, contractual reinforcement, risk-based escalation, or further review depending on the nature and severity of the risk.

Strengthening Digital Trust Across the Value Chain

Through its supplier cybersecurity, privacy, and digital trust expectations, we seek to create a supply chain ecosystem that is secure, resilient, compliant, and trusted. This is essential not only for internal governance, but also for customer confidence, regulatory assurance, business continuity, and long-term stakeholder value.

As our responsible supply chain framework continues to mature, the organization intends to further strengthen third-party cybersecurity oversight, supplier privacy governance, information security assessments, business continuity expectations, incident preparedness, and supplier digital risk monitoring.

This approach reflects our belief that digital trust cannot be built by the organization alone. It must be supported across the entire ecosystem of employees, suppliers, partners, technology providers, service providers, and customers. By embedding cybersecurity, privacy, and digital trust into supplier governance, we strengthen the resilience and responsibility of its broader value chain.

14.11 Monitoring, Evaluation and Continuous Improvement

We recognize that sustainable procurement cannot remain effective if it is limited to supplier onboarding, policy communication, or contractual expectations. Responsible supplier governance requires ongoing monitoring, periodic evaluation, structured engagement, risk review, and continuous improvement throughout the supplier lifecycle.

The business, regulatory, environmental, social, cybersecurity, and privacy expectations placed on suppliers continue to evolve. Suppliers may also change over time in terms of ownership, financial stability, service capability, technology maturity, ESG performance, compliance posture, operational resilience, or risk exposure. For this reason, SunTec views supplier monitoring as an ongoing governance activity rather than a one-time procurement step.

The purpose of supplier monitoring is to help the organization maintain visibility into supplier performance, identify emerging risks, assess alignment with responsible business expectations, and support timely corrective or improvement actions where required. This approach strengthens supplier accountability while also enabling SunTec to build stronger, more transparent, and more resilient supplier relationships.

Monitoring and evaluation activities are intended to support both compliance and improvement. Where suppliers demonstrate strong governance, reliability, sustainability alignment, and responsible conduct, we seek to build long-term, trusted relationships. Where gaps are identified, the organization may engage suppliers through clarification, review, improvement discussions, remediation expectations, escalation, or reassessment, depending on the nature and severity of the concern.

This approach reflects a continuous improvement mindset. our objective is not only to identify supplier risks, but also to progressively strengthen the quality, maturity, transparency, and resilience of the supplier ecosystem.



The following monitoring framework outlines the areas that may be considered as part of supplier evaluation and ongoing governance, depending on supplier category, risk profile, service type, contractual exposure, and operational criticality.

<i>Monitoring Area</i>	<i>Purpose of Monitoring</i>
<i>ESG Performance</i>	To understand how suppliers align with SunTec’s environmental, social, governance, and responsible business expectations.
<i>Compliance Performance</i>	To assess adherence to applicable laws, regulations, contractual obligations, procurement requirements, and internal governance expectations.
<i>Human Rights Practices</i>	To monitor alignment with expectations relating to dignity, non-discrimination, prevention of child labour, forced labour, trafficking, harassment, and exploitation.
<i>Labour Standards</i>	To review supplier practices relating to safe working conditions, fair treatment, responsible employment, grievance mechanisms, and worker wellbeing where applicable.
<i>Environmental Performance</i>	To evaluate supplier practices relating to resource efficiency, waste reduction, pollution prevention, environmental compliance, e-waste handling, and responsible disposal.
<i>Supplier Diversity</i>	To improve visibility into local, MSME, diverse, and community-linked supplier participation and strengthen inclusive sourcing practices over time.
<i>Information Security</i>	To assess whether relevant suppliers maintain appropriate controls to protect information assets, systems, customer environments, and confidential data.
<i>Privacy and Data Protection</i>	To review supplier safeguards relating to personal information, sensitive data, access control, processing obligations, retention, confidentiality, and incident reporting.
<i>Business Continuity</i>	To evaluate whether critical suppliers have preparedness, recovery, escalation, and continuity arrangements to support uninterrupted service delivery.
<i>Operational Resilience</i>	To assess supplier ability to respond to disruptions, maintain service reliability, manage dependencies, and reduce operational impact.
<i>Governance Performance</i>	To assess supplier maturity in areas such as internal controls, accountability, policy implementation, management oversight, and responsible decision-making.
<i>Ethical Conduct</i>	To monitor alignment with expectations relating to integrity, anti-bribery, anti-corruption, conflict-of-interest management, transparency, and fair business practices.
<i>Risk Management Effectiveness</i>	To evaluate whether supplier-related risks are being identified, communicated, managed, mitigated, and improved over time.

Supplier monitoring activities may include supplier reviews and assessments, governance and compliance evaluations, contractual performance reviews, information security reviews, privacy assessments, ESG performance monitoring, business continuity reviews, risk management reviews, supplier engagement meetings, improvement discussions, and documentation of follow-up actions where applicable.



For higher-risk or critical suppliers, monitoring may be more structured and may include additional review of service continuity, confidentiality controls, cybersecurity posture, privacy safeguards, incident preparedness, regulatory obligations, and escalation mechanisms. For standard suppliers, monitoring may be proportionate to the nature and risk of the engagement.

This risk-based monitoring approach allows us to focus oversight where it is most material while maintaining practical governance across the broader supplier base.

Evaluation and Improvement Process

Our approach to supplier evaluation is designed to support a cycle of continuous improvement. Supplier performance and governance maturity may be reviewed through a combination of operational feedback, procurement reviews, compliance checks, risk assessments, service performance discussions, and functional inputs from relevant teams.

Where improvement opportunities are identified, we may engage suppliers to clarify expectations, understand root causes, agree on improvement actions, strengthen controls, update documentation, reinforce contractual obligations, or define timelines for corrective measures. The nature of the response depends on the severity of the issue, the supplier's criticality, the risk involved, and the supplier's willingness and ability to improve.

This evaluation process helps us move from a reactive supplier management approach toward a more proactive governance model. It supports early identification of concerns, better risk visibility, stronger supplier dialogue, and improved accountability.

Closing the Loop

We recognize that continuous improvement requires more than identifying gaps. It also requires ownership, follow-up, learning, and integration of lessons into future procurement practices. As supplier governance matures, the organization intends to strengthen its ability to track supplier assessments, improvement actions, risk outcomes, issue closure, supplier engagement, and ESG-linked procurement indicators.

This "closing the loop" approach is important because it ensures that supplier monitoring leads to practical improvement rather than remaining a documentation exercise. It enables us to learn from supplier reviews, refine onboarding criteria, improve contractual expectations, enhance supplier communication, strengthen risk assessments, and build better reporting mechanisms.

Over time, this approach will support a more transparent and accountable supplier ecosystem. It will also help us demonstrate progress against sustainable procurement priorities, improve evidence quality for ESG assessments, strengthen customer confidence, and align supplier governance with evolving global expectations.

The organization remains committed to continuously enhancing procurement governance maturity while strengthening transparency, accountability, supplier engagement, supplier performance, and ESG integration across the supplier lifecycle.

Through structured monitoring, risk-based evaluation, supplier engagement, and continuous improvement, we seek to ensure that its responsible procurement framework remains practical, measurable, resilient, and aligned with the organization's long-term sustainability objectives.

14.12 Sustainable Procurement Roadmap

We view sustainable procurement as a long-term strategic journey that will continue to evolve alongside organizational priorities, stakeholder expectations, customer requirements, regulatory developments, technology risks, and global sustainability standards. The organization recognizes that responsible procurement maturity cannot be built through policy implementation alone. It requires progressive integration of ESG expectations into supplier selection, onboarding, contracting, risk assessment, monitoring, supplier engagement, data reporting, and continuous improvement.

Our sustainable procurement roadmap is therefore designed as a phased maturity pathway. It begins with strengthening foundational governance practices and supplier expectations, progresses toward structured ESG-linked supplier assessment and monitoring, and ultimately aims to build a responsible, resilient, transparent, inclusive, digitally trusted, and sustainability-aligned supplier ecosystem.

This roadmap also reflects the broader evolution of procurement within SunTec. Procurement is increasingly moving from a transactional sourcing function toward a strategic governance function that supports ESG performance, business continuity, customer trust, supplier accountability, risk management, environmental stewardship, data protection, and long-term stakeholder value creation.

Near-Term Priorities: Strengthening Foundations

In the near term, our focus is on strengthening the foundation of sustainable procurement by embedding ESG expectations more consistently into supplier onboarding, procurement governance, supplier communication, and reporting practices. This stage is focused on ensuring that supplier responsibility is clearly defined, communicated, and progressively integrated into procurement decision-making.

A key priority is to further strengthen ESG integration within supplier onboarding processes. This includes improving the visibility of supplier expectations relating to ethics, labour standards, human rights, environmental responsibility, information security, privacy, business continuity, and compliance. By embedding these expectations early in the supplier lifecycle, SunTec can ensure that responsible sourcing begins at the point of supplier identification and selection.

Another important near-term priority is expanding supplier awareness regarding our sustainability expectations. Suppliers need to understand not only contractual and service requirements, but also the broader responsible business principles that guide our procurement framework. This includes awareness of the Supplier Code of Conduct, Sustainable Procurement Policy, privacy and cybersecurity expectations, environmental responsibility, and ethical conduct standards.

We also intend to enhance supplier governance and compliance mechanisms by improving documentation, ownership, internal coordination, and supplier review practices. This will support more consistent implementation of sustainable procurement expectations across relevant supplier categories.

Improving procurement-related ESG reporting capabilities is another important near-term focus. As ESG reporting expectations continue to evolve, we recognize the need to strengthen visibility into supplier-related indicators such as supplier ESG coverage, supplier diversity, local sourcing, supplier risk categorization, supplier awareness, supplier privacy and cybersecurity requirements, and responsible sourcing practices.

In addition, the organization will continue strengthening supplier cybersecurity and privacy oversight, particularly for suppliers that support technology services, cloud platforms, customer environments, confidential information, data processing, infrastructure, or business-critical operations.

Medium-Term Priorities: Expanding Risk-Based Supplier Governance

In the medium term, we aim to move from foundational integration toward a more structured and risk-based supplier governance model. This phase will focus on expanding ESG-based supplier assessments, strengthening supplier segmentation, improving supplier risk categorization, and increasing monitoring of supplier ESG performance.

A key medium-term priority is to expand ESG-based supplier assessments across strategic, critical, high-risk, technology, and information-sensitive suppliers. These assessments will help us better understand supplier maturity across areas such as ethics, human rights, labour practices, environmental management, privacy, cybersecurity, compliance, business continuity, and operational resilience.

The organization also intends to implement enhanced supplier risk categorization frameworks. This will enable us to differentiate suppliers based on strategic importance, operational criticality, information access, technology dependency, sustainability exposure, regulatory relevance, and potential business impact. Such categorization will allow the organization to apply proportionate oversight and focus governance resources where risks are most material.

Strengthening supplier segmentation and governance practices will also be important during this phase. Supplier segmentation will support clearer monitoring expectations, differentiated review frequency, more structured engagement, and targeted improvement actions. This will help us to move towards a more intelligence-driven procurement model that combines ESG priorities with operational risk management.

Supplier engagement on sustainability topics will also be expanded. We recognize that supplier maturity varies across the ecosystem, and meaningful progress requires dialogue, awareness building, and collaborative improvement. Medium-term engagement may focus on supplier ESG awareness, environmental stewardship, human rights expectations, privacy and data protection, cybersecurity readiness, business continuity preparedness, and responsible technology practices.

Another important medium-term priority is enhancing supplier diversity and inclusion initiatives. We intend to improve visibility into local suppliers, MSME participation, diverse supplier engagement, and community-linked procurement opportunities. This will support the organization's broader objective of creating an inclusive and resilient supplier ecosystem.

Long-Term Priorities: Building a Responsible, Resilient and Future-Ready Supply Chain

In the long term, our ambition is to develop a fully integrated sustainable supply chain model in which ESG, risk, resilience, digital trust, inclusion, environmental responsibility, and supplier accountability are embedded throughout the procurement lifecycle.

This long-term vision includes expanding ESG-linked supplier reporting and transparency. As supplier governance systems mature, we aim to improve the quality, consistency, and usefulness of supplier-related ESG data. This may include supplier assessment outcomes, diversity indicators, environmental procurement data, supplier risk metrics, supplier monitoring results, improvement actions, and supplier engagement coverage.

We also intend to strengthen circular economy integration within procurement practices. This includes increasing attention to lifecycle management, reuse, refurbishment, recycling, recovery, responsible disposal, e-waste governance, sustainable IT procurement, and environmentally responsible sourcing. Over time, procurement decisions are expected to increasingly reflect not only purchase cost and performance, but also lifecycle value, environmental impact, resource efficiency, and responsible disposal pathways.

Another long-term priority is increasing environmentally responsible sourcing initiatives. This will involve deeper integration of green procurement principles, supplier environmental expectations, resource efficiency considerations, sustainable technology procurement, and low-impact operational purchasing practices.

The organization also aims to enhance collaboration with responsible supplier ecosystems. This means building deeper partnerships with suppliers that demonstrate alignment with our values, governance standards, customer expectations, digital trust requirements, and sustainability objectives. Such partnerships can support innovation, resilience, improved ESG outcomes, and shared value creation.

Ultimately, SunTec's long-term sustainable procurement ambition is to promote resilient, low-carbon, inclusive, secure, digitally trusted, and future-ready supply chains that can support the organization's growth while contributing positively to customers, employees, suppliers, communities, regulators, and society.

14.13 Future Outlook

We believe that the future of procurement extends well beyond sourcing goods and services. In a rapidly changing business environment, procurement is increasingly becoming a strategic enabler of sustainability, resilience, innovation, responsible growth, risk management, digital trust, and long-term stakeholder value creation.

For a technology organization serving global customers in complex and regulated industries, the supplier ecosystem is closely connected to business continuity, customer confidence, operational resilience, information security, privacy protection, environmental responsibility, ethical conduct, and social impact. As a result, sustainable procurement is not only about selecting the right suppliers; it is about building a responsible ecosystem that can support SunTec's business, values, customers, employees, communities, and long-term ESG priorities.

As stakeholder expectations continue to evolve, SunTec will continue strengthening sustainable procurement capabilities through enhanced governance, supplier collaboration, ESG integration, responsible sourcing, digital trust, environmental stewardship, supplier diversity, and supply chain resilience. This will require deeper alignment between procurement, ESG, compliance, information security, privacy, legal, finance, administration, business continuity, and operational teams.

The next phase of our sustainable procurement journey will focus on strengthening supplier ESG governance and expanding supplier sustainability engagement. The organization aims to increase visibility into supplier risks and opportunities, improve supplier-related ESG data, enhance supplier transparency, and strengthen accountability across the supplier lifecycle.

A key priority will be to further integrate ESG expectations into supplier onboarding, due diligence, contracting, monitoring, and periodic review mechanisms. This will help ensure that supplier relationships are assessed not only for commercial suitability, but also for alignment with our expectations relating to ethics, human rights, labour practices, environmental responsibility, cybersecurity, privacy, operational resilience, and responsible business conduct.

We will also continue enhancing supplier diversity and inclusion. The organization recognizes that procurement can support inclusive economic growth by encouraging participation from local suppliers, MSMEs, diverse businesses, and community-linked enterprises where feasible and commercially appropriate. By strengthening inclusive sourcing practices, SunTec can contribute to broader economic participation while improving supply chain flexibility, innovation, and resilience.

Environmental procurement will remain another important priority. We intend to strengthen green procurement practices, circular economy integration, responsible IT asset lifecycle management, e-waste governance, sustainable technology procurement, resource efficiency, and supplier environmental engagement. These practices will help connect procurement more closely with the organization's broader environmental responsibility, Green IT, and digital sustainability objectives.

Cybersecurity, privacy, and digital trust will also continue to be central to our supplier governance model. As digital ecosystems become more interconnected, the organization will further strengthen oversight of suppliers that support technology services, cloud platforms, customer environments, confidential information, data processing, infrastructure, and business-critical operations. This will help protect stakeholder information, support regulatory compliance, strengthen operational resilience, and reinforce customer trust.



The organization's future sustainable procurement priorities can therefore be understood as a shift toward a more integrated, intelligence-driven, and impact-oriented model of supplier governance. This model will seek to combine commercial performance with ESG accountability, supplier collaboration, risk management, resilience, inclusion, digital trust, and long-term value creation.

Through this journey, SunTec seeks to build a supply chain ecosystem that is resilient in operations, responsible in conduct, transparent in governance, inclusive in participation, secure in information handling, sustainable in environmental impact, and future-ready in its ability to respond to changing business, regulatory, technological, and stakeholder expectations.





15. Product Responsibility, Data Privacy and Digital Trust

15.1 Product Responsibility in a Digital Trust Economy

At SunTec Business Solutions, product responsibility is central to the way we design, build, deliver, modernize, and operate technology platforms for customers across global markets. As a technology-driven organization serving financial institutions, digital enterprises, communication service providers, and other complex business ecosystems, we recognize that our products do not merely support operational processes; they influence customer experience, revenue management, pricing transparency, billing accuracy, partner ecosystem governance, regulatory responsiveness, and long-term business resilience.

In today’s increasingly digital and regulated economy, product responsibility extends beyond functional capability. It includes security, privacy, resilience, regulatory adaptability, transparency, interoperability, ethical technology usage, data protection, accessibility, sustainability, and customer trust. For SunTec, these responsibilities are deeply connected to our ESG philosophy and our commitment to responsible innovation.

Our approach to product responsibility is shaped by the belief that technology should be scalable, secure, reliable, adaptable, sustainable, and trustworthy. We continuously invest in product modernization, platform engineering, cloud readiness, automation, AI-enabled capabilities, digital transformation, and secure architecture to ensure that our solutions remain relevant for customers operating in rapidly evolving business and regulatory environments.

SunTec’s flagship platform, SunTec Xelerate, has been designed as a modular, scalable, configurable, and globally deployable platform capable of supporting large-scale, transaction-intensive environments across diverse markets and jurisdictions. It is designed to help organizations respond more effectively to market changes, regulatory expectations, customer demands, ecosystem complexity, and evolving business models.

SunTec’s product responsibility framework is built around six core principles:

<i>Principle</i>	<i>What it Means for SunTec</i>
<i>Trust by Design</i>	Products and platforms are designed to protect information, strengthen resilience, and support customer confidence.
<i>Security and Privacy by Architecture</i>	Security, confidentiality, controlled access, and privacy safeguards are embedded into product design and delivery practices.
<i>Regulatory Adaptability</i>	Platforms are designed to support customers operating across diverse jurisdictions and evolving compliance environments.
<i>Interoperability and Openness</i>	Product architecture supports integration, ecosystem participation, modularity, and alignment with recognized industry standards.



Responsible Innovation

Emerging technologies, including AI-enabled capabilities, are governed through ethical, secure, and accountable practices.

Sustainable Digital Growth

Product modernization, cloud readiness, and digital-first operations support efficiency, scalability, and lower operational friction.

Through this approach, SunTec aims to ensure that product innovation contributes not only to customer value and business agility, but also to responsible growth, digital trust, operational resilience, and sustainable transformation.

15.2 Our Approach towards innovation

Innovation remains central to our long-term strategy, product vision, and value creation approach. As a technology-driven organization operating within complex financial ecosystems, we continuously invest in building scalable, resilient, secure, and future-ready platforms that enable clients to operate efficiently across rapidly evolving business and regulatory environments.

Our flagship product, SunTec Xelerate, has been designed to serve as a flexible and configurable digital product that can be deployed across multiple operating models, geographies, customer segments, and business contexts. The product supports organizations seeking to modernize pricing, billing, product management, revenue realization, partner ecosystem management, and customer-centric engagement without necessarily replacing their entire core infrastructure.

The organization continues to strengthen its technology ecosystem through sustained investments in product modernization, platform engineering, automation, cloud readiness, AI-enabled capabilities, and digital transformation initiatives. A larger part of SunTec's annual investment allocation is directed toward product development, innovation, and platform enhancement initiatives.

Our products are designed to support real-time transaction processing, multi-country and multi-jurisdiction deployments, configurable and modular deployment architectures, SaaS, hybrid and on-premises operating models, enterprise-grade operational scalability, and long-term customer adaptability.

SunTec also maintains a collaborative product development approach, working closely with clients to continuously refine product capabilities and align future development priorities with emerging business, operational, technological, and regulatory requirements. This customer-centric approach helps ensure that our products remain resilient, relevant, efficient, secure, and future-ready.



15.3 SunTec Xelerate as a Responsible Digital Product

SunTec Xelerate is central to the organization’s product ecosystem and reflects the company’s approach to responsible, scalable, and customer-centric technology. The product has been designed to enable enterprises to manage complex pricing, billing, product, revenue, and partner ecosystem requirements with greater accuracy, transparency, and agility.

SunTec Xelerate supports organizations that operate in environments where customer relationships, product complexity, regulatory obligations, partner ecosystems, and pricing models are continuously evolving. By providing a configurable and modular platform, SunTec helps customers reduce operational rigidity, improve time-to-market, enhance customer experience, and strengthen revenue management capabilities.

The following are our product modules:

<i>Product Module</i>	<i>Responsible Product Value</i>
<i>Relationship-Based Pricing</i>	Enables more customer-centric, transparent, and contextual pricing decisions.
<i>Enterprise Product Management</i>	Provides a structured and controlled approach to managing product and service definitions.
<i>Billing and Statements Management</i>	Supports accuracy, consistency, and reliability in customer billing processes.
<i>Deal Management</i>	Helps manage pricing exceptions, approvals, and customer-specific commercial arrangements.
<i>Ecosystem Management</i>	Enables enterprises to manage complex partner relationships and ecosystem monetization.
<i>Dynamic Offer Management</i>	Supports customer-specific offers and responsive product innovation.
<i>Indirect Taxation and E-Invoicing</i>	Helps customers respond to complex tax and invoicing requirements across jurisdictions.
<i>SaaS and Cloud-Ready Deployment</i>	Supports scalable, flexible, and modern digital operating models.

The responsible product value of SunTec Xelerate is not limited to technical performance. It also lies in enabling customers to simplify complexity, reduce manual interventions, improve transparency, strengthen governance, and support regulatory responsiveness. This is especially important for industries where pricing, billing, revenue assurance, customer data, product definitions, and compliance requirements are business critical.

By supporting digital-first operating models, Xelerate also contributes indirectly to sustainability outcomes by enabling process automation, reducing paper-based workflows, improving operational efficiency, minimizing duplication of effort, and supporting more scalable technology operations.





15.4 BIAN Alignment, Interoperability and Open Architecture

As financial institutions continue to modernize their technology landscapes, interoperability, modularity, and standards-based architecture are becoming increasingly important. SunTec recognizes that responsible product design must support integration, openness, adaptability, and long-term architectural sustainability.

SunTec’s engagement with the Banking Industry Architecture Network (BIAN) and its work around BIAN conformance reflects this commitment to open and standards-aligned innovation. BIAN provides an industry architecture framework that helps banks and technology providers standardize and simplify banking architecture. Alignment with BIAN principles supports interoperability, modularity, reusability, and reduced complexity across banking ecosystems.

SunTec has undertaken BIAN alignment work for SunTec Xelerate, including mapping SunTec Xelerate capabilities to BIAN Service Domains and assessing API alignment with BIAN concepts. This reflects the organization’s commitment to building products that can integrate effectively within modern banking architectures while supporting ecosystem collaboration and future-ready digital transformation.

SunTec’s BIAN-oriented approach supports several responsible product objectives:

<i>Responsible Product Objective</i>	<i>BIAN-Linked Value</i>
<i>Interoperability</i>	Supports easier integration across banking systems and partner ecosystems.
<i>Modularity</i>	Enables reusable and composable product capabilities.
<i>Reduced Complexity</i>	Supports simplified interactions across enterprise architecture landscapes.
<i>Faster Innovation</i>	Helps customers respond more quickly to market and regulatory changes.
<i>Industry Collaboration</i>	Aligns product evolution with recognized banking architecture principles.
<i>Future-Ready Architecture</i>	Supports long-term adaptability and reduced technology lock-in.
<i>Trust and Transparency</i>	Standards alignment strengthens customer confidence in product architecture.

For SunTec, BIAN alignment is not only a technology initiative; it is also a product responsibility priority. By promoting interoperability and modular architecture, the organization supports customers in building more agile, efficient, and sustainable digital ecosystems.





15.5 Data Integrity and Customer Privacy

SunTec maintains a strong commitment toward protecting customer information, ensuring data integrity, and safeguarding privacy across all business operations and product environments. Given the nature of our operations involving financial, transactional, operational, customer, and sensitive information, data privacy and information protection remain fundamental to our governance and operational practices.

The organization maintains a zero-tolerance approach toward compromise in data integrity, confidentiality, and privacy. Robust governance mechanisms, operational controls, and security practices have been implemented to ensure that customer and business information is handled responsibly and securely.

SunTec’s data integrity and privacy approach focuses on:

<i>Focus Area</i>	<i>SunTec’s Approach</i>
<i>Data Integrity</i>	Ensuring accuracy, reliability, consistency, and controlled processing of financial and operational data.
<i>Confidentiality</i>	Protecting sensitive customer, business, employee, and operational information from unauthorized access or disclosure.
<i>Privacy Protection</i>	Safeguarding personal information and supporting responsible data processing practices.
<i>Controlled Access</i>	Ensuring that sensitive systems and information are accessed only by authorized personnel.
<i>Regulatory Compliance</i>	Aligning practices with applicable data protection and privacy requirements.
<i>Secure Processing</i>	Maintaining governance controls across data processing, storage, transmission, and retention.
<i>Accountability</i>	Reinforcing responsible data handling through policies, training, monitoring, and audit mechanisms.

SunTec’s information security and privacy practices are aligned with internationally recognized standards and frameworks, including ISO 27001-certified Information Security Management Systems, GDPR and related global privacy frameworks, data protection and cybersecurity governance practices, continuous monitoring mechanisms, and risk assessment processes.

The organization also conducts quarterly internal audits, annual surveillance audits, periodic re-certification reviews, and risk assessments across applications, infrastructure, and operational environments. Audit findings and observations are reviewed by leadership teams, with corrective and preventive actions implemented where required to support continuous improvement and governance maturity.

SunTec’s privacy and security practices are further reinforced through information security policy frameworks, cybersecurity governance mechanisms, privacy and confidentiality





controls, secure access management practices, employee awareness and training programs, and incident monitoring and response mechanisms.

These controls collectively help strengthen operational resilience, customer trust, regulatory compliance, and responsible product governance across the organization’s technology and service ecosystem.

15.6 Global Regulatory Compliance

As a global organization serving customers across multiple regions and jurisdictions, SunTec recognizes the importance of maintaining compliance with evolving privacy, data protection, cybersecurity, financial, and digital regulatory requirements.

The organization maintains alignment with multiple global and regional data protection and privacy regulations, including the General Data Protection Regulation in the European Union, UK and European data protection regulations, the Gramm-Leach-Bliley Act in the United States, the Personal Data Protection Act in Singapore, UAE data protection regulations, and India’s Digital Personal Data Protection Act.

This multi-jurisdictional compliance approach enables SunTec to support global customers while ensuring that products, operational practices, governance mechanisms, and data handling processes remain aligned with diverse regulatory environments and customer expectations.

<i>Regulation / Framework</i>	<i>Relevance to SunTec</i>
<i>GDPR – European Union</i>	Supports privacy, consent, data subject rights, transfer safeguards, and responsible data processing.
<i>UK and European Data Protection Regulations</i>	Reinforces privacy governance for customers and stakeholders in European jurisdictions.
<i>GLBA – United States</i>	Relevant to data protection expectations in financial services environments.
<i>PDPA – Singapore</i>	Supports privacy and data protection practices in Singapore-linked operations and customer contexts.
<i>UAE Data Protection Regulations</i>	Supports responsible privacy governance across Middle East operations and customers.
<i>DPDP Act – India</i>	Supports India-aligned privacy governance, personal data protection, and responsible processing obligations.
<i>Customer-Specific Requirements</i>	Enables alignment with contractual, regulatory, and industry-specific compliance expectations.

The organization continuously monitors evolving regulatory developments and strengthens governance practices to support ongoing compliance, operational resilience, secure product delivery, and responsible data processing across global markets.





15.7 Responsible Data Processing

SunTec follows a strict and governance-driven approach toward data processing and handling, particularly in environments involving financial, operational, transactional, and customer-sensitive information.

The organization’s data governance practices are designed to ensure that data access is restricted and role-based, processing activities are aligned with approved client requirements, sensitive information is handled securely and responsibly, unauthorized or secondary use of customer data is prohibited, and data confidentiality and integrity are maintained across operational environments.

<i>Principle</i>	<i>Implementation Approach</i>
<i>Purpose Limitation</i>	Data is processed only for defined and authorized business, operational, or contractual purposes.
<i>Role-Based Access</i>	Access to sensitive information is restricted based on business need and authorization.
<i>Data Minimization</i>	Only necessary information is retained or processed where applicable.
<i>Confidentiality</i>	Sensitive customer and business information is protected through operational and technical controls.
<i>Integrity</i>	Controls are maintained to preserve accuracy and reliability of information.
<i>Secure Processing</i>	Processing environments are governed through defined security and access controls.
<i>Accountability</i>	Employees handling sensitive information are trained and held accountable for responsible data practices.
<i>No Unauthorized Secondary Use</i>	Customer data is not used for unauthorized or unrelated purposes.

Access to sensitive data is controlled through formal authorization mechanisms and operational safeguards to ensure that only appropriately authorized and trained personnel can access critical information.

SunTec also mandates periodic refresher training programs for employees handling sensitive data, assessment-based certifications for personnel working on client environments, and awareness initiatives relating to data handling, confidentiality, privacy, and compliance obligations.

These measures help reinforce accountability, reduce operational risks, strengthen governance maturity, and ensure responsible data handling practices across the organization.





15.8 Product Design, Security and Privacy by Architecture

Data protection and security considerations are embedded into SunTec’s product architecture, solution engineering, and delivery methodologies. The organization follows a security and privacy by design approach aimed at minimizing exposure risks while strengthening operational resilience and customer trust.

Product design and engineering practices are guided by principles that ensure information protection, access governance, privacy safeguards, and operational resilience are considered throughout the product lifecycle.

<i>Design Principle</i>	<i>Product Responsibility Outcome</i>
<i>Data Minimization</i>	Reduces unnecessary data exposure and supports responsible processing.
<i>Anonymization and Masking</i>	Protects sensitive information where appropriate.
<i>Secure Architecture</i>	Strengthens product resilience and reduces vulnerability exposure.
<i>Controlled Processing Environments</i>	Ensures data is processed within governed and authorized environments.
<i>Strong Access Management</i>	Restricts access to authorized personnel and approved use cases.
<i>Client-Controlled Deployment</i>	Enables customers to retain control over critical processing environments where applicable.
<i>Configurable Security Controls</i>	Supports customer-specific security and compliance requirements.
<i>Privacy-Aware Engineering</i>	Embeds privacy expectations into product design and delivery practices.
<i>Compliance-Aligned Deployment</i>	Supports customer regulatory and governance requirements across jurisdictions.

Sensitive information is masked or anonymized where appropriate, and only essential attributes are retained for operational or analytical purposes. In many deployment models, critical processing and analysis activities are conducted within client-controlled environments and infrastructure, helping significantly reduce data exposure risks.

SunTec’s product engineering and platform governance practices also emphasize secure development methodologies, configurable security controls, operational resilience and availability, privacy-aware architecture, and compliance-aligned deployment practices.

Product functionalities, particularly within transaction-intensive pricing, billing, revenue management, and financial processing environments, are developed in close collaboration





with customers to ensure alignment with operational, security, regulatory, and performance requirements.

15.9 Cybersecurity and Data Protection Framework

SunTec maintains a robust cybersecurity and information protection framework designed to safeguard organizational systems, client environments, digital infrastructure, applications, and sensitive information assets.

The organization’s cybersecurity approach includes continuous monitoring of systems and applications, vulnerability management and risk mitigation practices, physical, technical and administrative security controls, protection against phishing, malware and cyber threats, secure access management and endpoint protection, incident response mechanisms, and operational resilience practices.

<i>Governance Area</i>	<i>Control Focus</i>
<i>Information Security</i>	Protecting confidentiality, integrity, and availability of information assets.
<i>Cybersecurity Governance</i>	Managing cyber risks, controls, monitoring, and resilience practices.
<i>Endpoint Security</i>	Securing devices and endpoints used across operations.
<i>Access Management</i>	Ensuring authorized and role-based access to systems and information.
<i>Cloud and SaaS Security</i>	Supporting secure use of cloud-based and SaaS environments.
<i>Vulnerability Management</i>	Identifying, assessing, and mitigating technical vulnerabilities.
<i>Incident Response</i>	Managing security events, escalation, investigation, and remediation.
<i>Breach Handling</i>	Supporting response mechanisms for potential information security or privacy incidents.
<i>Business Continuity</i>	Ensuring resilience and continuity of critical services and systems.

During the reporting period, no substantiated complaints regarding breaches of customer privacy were recorded, no incidents of data leaks, theft, or loss were identified, and no regulatory actions or monetary losses relating to data breaches were reported.

These outcomes reflect the effectiveness of SunTec’s information security, privacy, monitoring, and governance practices, while reinforcing the organization’s commitment to customer trust and digital resilience.





15.10 User Privacy and Rights

SunTec is committed to ensuring transparency, accountability, and user control in relation to the collection, use, processing, retention, and protection of personal information.

The organization’s privacy practices are guided by transparency in data collection and usage, consent-based processing where applicable, purpose limitation, responsible data use, respect for user rights and privacy expectations, secure retention and deletion practices, and compliance with applicable privacy laws and contractual obligations.

Users are informed regarding what information is collected, how data is used and protected, applicable privacy and security safeguards, and available rights and choices relating to personal data.

Users may also exercise rights relating to access to personal information, correction of inaccuracies, deletion requests, communication preferences, and opt-out mechanisms where applicable.

Principle	SunTec Commitment
<i>Transparency</i>	Clear communication regarding data collection and usage.
<i>Control</i>	Support for user choices and rights where applicable.
<i>Purpose Limitation</i>	Personal information is used only for defined and appropriate purposes.
<i>Secure Retention</i>	Personal information is retained only for defined operational, legal, contractual, or regulatory purposes.
<i>Secure Deletion</i>	Personal information is securely deleted following applicable retention timelines.
<i>Accountability</i>	Privacy governance is supported through defined ownership, review mechanisms, and awareness programs.

The organization maintains a dedicated privacy governance framework supported through privacy professionals and governance teams, periodic privacy policy reviews, awareness and communication mechanisms, and regulatory monitoring and compliance activities.

15.11 Third-Party Risk and Data Protection Controls

SunTec extends its privacy, security, confidentiality, and governance expectations across third-party engagements, suppliers, contractors, technology vendors, consultants, and partner ecosystems.

The organization recognizes that third-party governance is an essential component of digital trust. Suppliers and partners that support technology delivery, data processing, cloud operations, infrastructure services, professional services, customer





environments, or operational support may have access to information assets, systems, or processes that require strong governance controls.

SunTec maintains controls relating to third-party assessments and due diligence, evaluation of privacy and compliance practices, confidentiality agreements and access controls, controlled access to customer and operational environments, governance expectations for suppliers and partners, and ongoing monitoring of third-party risk.

<i>Control Area</i>	<i>Governance Objective</i>
<i>Third-Party Assessments</i>	Evaluate supplier capability, compliance, and risk exposure.
<i>Privacy Due Diligence</i>	Assess privacy and data protection practices where applicable.
<i>Confidentiality Agreements</i>	Protect customer, business, and sensitive information.
<i>Access Controls</i>	Ensure controlled and authorized access to systems and environments.
<i>Compliance Expectations</i>	Reinforce contractual and regulatory obligations.
<i>Security Requirements</i>	Support secure handling of information and technology assets.
<i>Operational Monitoring</i>	Strengthen oversight over critical third-party relationships.
<i>Business Continuity Expectations</i>	Support resilience of supplier-supported services.

Third-party vendors and partners are expected to comply with established information security, privacy, confidentiality, and governance requirements to help ensure a secure and compliant operational ecosystem.

SunTec also recognizes the increasing importance of supply chain cybersecurity and continues to strengthen third-party governance practices as part of its broader risk management and ESG maturity journey.

As artificial intelligence and emerging digital technologies become increasingly embedded into business processes, customer engagement models, data analytics, automation, and enterprise decision-making, SunTec recognizes the need to govern their adoption responsibly.

Responsible technology governance is essential to ensuring that innovation is aligned with privacy, security, fairness, transparency, accountability, human oversight, and regulatory expectations. SunTec’s responsible technology approach is therefore designed to balance innovation with ethical and secure usage.

<i>Principle</i>	<i>Application</i>
<i>Human Oversight</i>	AI and emerging technologies should remain subject to appropriate human accountability and governance.





<i>Privacy Protection</i>	AI-enabled and data-driven processes must respect privacy and data protection obligations.
<i>Security</i>	Emerging technology usage must be aligned with cybersecurity and information protection controls.
<i>Transparency</i>	Technology use should be explainable and governed through clear expectations where applicable.
<i>Responsible Data Use</i>	Data used in digital and AI-enabled systems must be handled responsibly and lawfully.
<i>Risk-Based Governance</i>	Emerging technologies should be evaluated based on potential operational, ethical, privacy, and security risks.
<i>Compliance</i>	Technology adoption must align with applicable laws, customer obligations, and internal policies.
<i>Continuous Improvement</i>	Governance practices should evolve with changing technology risks and regulatory expectations.

During the reporting period, SunTec strengthened awareness relating to responsible technology usage, deepfake risks, digital impersonation threats, cybersecurity preparedness, secure AI usage, and responsible digital behaviour. These initiatives help employees better understand emerging digital risks while supporting responsible and secure adoption of new technologies.

SunTec’s broader responsible technology approach is also connected to its Artificial Intelligence Usage Policy, information security governance, data privacy framework, cybersecurity awareness programs, and secure product engineering practices.

15.12 Product Sustainability and Green Digital Operations

Product responsibility is increasingly connected to environmental responsibility. As organizations accelerate digital transformation, technology platforms must be designed and operated in ways that support efficiency, scalability, resilience, and responsible resource utilization.

SunTec’s product and technology modernization efforts support sustainable digital growth through cloud readiness, efficient infrastructure utilization, automation, digital-first workflows, reduced reliance on manual processes, and improved operational scalability.

<i>Focus Area</i>	<i>Sustainability Contribution</i>
<i>Cloud-Ready Architecture</i>	Supports scalable and efficient deployment models.
<i>SaaS Enablement</i>	Reduces infrastructure burden for customers and supports flexible digital operations.
<i>Modular Design</i>	Enables reuse, upgradeability, and long-term maintainability.
<i>Digital Workflows</i>	Reduces manual interventions and paper-based processes.
<i>Efficient Processing</i>	Supports optimized transaction handling and operational efficiency.





<i>Product Maintainability</i>	Extends product relevance and reduces unnecessary rework.
<i>Green IT Alignment</i>	Supports responsible digital infrastructure and lifecycle thinking.

SunTec’s SaaS and cloud-ready product capabilities provide customers with flexibility to run SunTec Xelerate products and solutions on modern cloud-based platforms while supporting secure and reliable operations. Cloud-based and modular deployment models can help customers modernize operations with greater agility, scalability, and efficiency.

The organization’s digital sustainability approach is also supported by Green IT and Digital Sustainability initiatives, cloud optimization, secure and efficient infrastructure practices, product maintainability, and responsible technology governance.

Through these efforts, SunTec aims to ensure that technology modernization contributes not only to customer agility and operational performance, but also to sustainability, efficiency, and long-term resilience.

15.13 Training, Awareness and Governance

SunTec places strong emphasis on awareness, governance, accountability, and continuous capability building across its workforce to strengthen privacy, security, responsible technology, and digital trust practices.

Key initiatives include mandatory training programs on data privacy and information security, awareness campaigns relating to cybersecurity and digital risks, periodic reinforcement through internal communications, governance-focused awareness initiatives, and half-yearly management review meetings relating to data security and privacy.

These initiatives help strengthen organizational awareness and preparedness, reinforce responsible handling of information, improve governance and compliance maturity, support secure and ethical operational practices, and align the workforce with evolving threat landscapes and regulatory expectations.

Focus Area	Purpose
<i>Data Privacy Training</i>	Reinforces responsible handling of personal and sensitive information.
<i>Information Security Awareness</i>	Strengthens understanding of security responsibilities and controls.
<i>Cybersecurity Campaigns</i>	Improves preparedness against phishing, fraud, malware, and digital threats.
<i>Responsible Technology Awareness</i>	Supports responsible use of AI, digital tools, and emerging technologies.
<i>Client Environment Certifications</i>	Ensures personnel working on customer environments understand obligations.





<i>Management Reviews</i>	Strengthens governance oversight and continuous improvement.
<i>Policy Awareness</i>	Reinforces expectations relating to privacy, security, confidentiality, and responsible conduct.

The organization recognizes that awareness and governance maturity remain critical in maintaining trust, resilience, and operational security within a rapidly evolving digital environment.

15.14 Product Responsibility Performance Indicators

SunTec continues to strengthen product responsibility, privacy, cybersecurity, and digital trust measurement as part of its broader ESG and governance maturity journey. The organization tracks available performance indicators and intends to progressively expand reporting coverage as measurement systems mature.

<i>Indicator</i>	<i>FY 2025</i>	<i>FY 2026</i>
<i>Product Development / Innovation Investment</i>	~30% annual investment allocation	~40% annual investment allocation
<i>ISO 27001 Information Security Framework</i>	Maintained	Maintained
<i>Substantiated Customer Privacy Complaints</i>	0	0
<i>Identified Data Leak, Theft or Loss Incidents</i>	0	0
<i>Regulatory Actions Relating to Data Breaches</i>	0	0
<i>Monetary Losses Relating to Data Breaches</i>	0	0
<i>Data Privacy and Security Awareness Programs</i>	Conducted	Expanded
<i>Management Reviews on Security and Privacy</i>	Conducted	Conducted
<i>Client Environment Refresher Training</i>	Active	Active
<i>Privacy and Data Protection Policies</i>	Active	Strengthened
<i>Responsible AI Governance</i>	Emerging	Strengthened
<i>Third-Party Data Protection Controls</i>	Active	Strengthened





<i>Secure Product Engineering Practices</i>	Active	Strengthened
<i>BIAN Alignment / Architecture Conformance Work</i>	Active	Strengthened
<i>SaaS / Cloud-Ready Product Capabilities</i>	Available	Expanded

As SunTec’s ESG and product governance reporting matures, the organization aims to enhance tracking of additional indicators such as privacy impact assessments, secure development coverage, vulnerability remediation timelines, product accessibility indicators, responsible AI review metrics, cloud efficiency indicators, and customer trust-related governance measures.



16. ESG Performance, Metrics, Milestones and Insights

16.1 Approach to ESG Measurement

SunTec's ESG journey is increasingly moving from policy articulation and program implementation toward measurable performance, structured monitoring, and evidence-based decision-making. As the organization continues to strengthen its sustainability governance maturity, ESG measurement has become an important mechanism for tracking progress, identifying gaps, improving accountability, and aligning long-term business priorities with environmental, social, governance, digital responsibility, and stakeholder expectations.

The ESG metrics framework at SunTec is designed to translate sustainability commitments into measurable outcomes. It follows a structured **Policy → Action → KPI → Outcome** model, ensuring that ESG policies and governance commitments are connected to operational initiatives, performance indicators, trend analysis, and continuous improvement priorities.

This measurement approach enables the organization to evaluate ESG performance across key dimensions including climate and energy, resource efficiency, waste and circularity, workforce development, diversity and inclusion, employee wellbeing, human rights, ethics, information security, data privacy, product responsibility, sustainable procurement, and community impact.

The framework is aligned with globally recognized sustainability principles and reporting expectations, including GRI-aligned disclosures, UN Global Compact principles, climate-related measurement practices, and stakeholder-driven ESG expectations. Certain metrics are already tracked through internal systems and operational records, while other indicators are being progressively strengthened as data systems, reporting boundaries, supplier information, and ESG governance mechanisms mature.

SunTec recognizes that ESG measurement is an evolving journey. Accordingly, this section presents both current performance indicators and forward-looking milestone trackers that reflect the organization's direction of travel. Where data is under development, the organization has identified the metric for future tracking to support improved transparency, accountability, and ESG maturity over time.

16.2 ESG Metrics Dashboard

SunTec's ESG dashboard consolidates key performance indicators across environmental, social, governance, procurement, and digital responsibility dimensions. The dashboard is designed to provide a transparent view of year-on-year performance, trend direction, and maturity priorities.



16.2.1 Climate, Energy and Emissions Metrics

Indicator	Unit	FY 2024–25	FY 2025–26	Trend	Notes
Total Energy Consumption	kWh	2,000,000	1,620,000	↓	Includes all major facilities and operational energy usage
Renewable Energy Share	%	6%	10%		Includes all the three scopes
Scope 1 Emissions	tCO ₂ e	70	68	↓	Direct emissions from owned or controlled sources
Scope 2 Emissions	tCO ₂ e	1,200	1,150	↓	Electricity-related emissions
Scope 3 Business Travel Emissions	tCO ₂ e	54	52	↓	Travel-related emissions under progressive tracking
Hybrid Work Impact	Qualitative / Quantitative	Active	Active	Positive	Supports reduced travel and facility intensity
Business Trips	Number	359	340	↓	Supports reduced travel and facility intensity

16.2.2 Resource Efficiency Metrics

Indicator	Unit	FY 2024–25	FY 2025–26	Trend	Notes
Water Consumption	KL	12,500	10,200	↓	Facility-level usage
Water Recycled	% recycled	24%	35%	↓	Recycled water usage

16.2.3 Waste and Circularity Metrics

Indicator	Unit	FY 2024–25	FY 2025–26	Trend	Notes
Total Waste Generated	MT	72	68	↓	Includes major operational waste streams
Waste Recycled	%	46%	52%	↑	Linked to recycling and recovery programs





<i>E-Waste Recycled</i>	%	100%	100%	Maintained	Managed through certified / authorized vendors
<i>IT Assets Covered by Lifecycle Controls</i>	%	100%	100%	↑	Linked to Green IT and circularity practices
<i>Circular Procurement Practices</i>	Status	Emerging	Strengthening	↑	Linked to sustainable procurement and lifecycle thinking
<i>Responsible Disposal Mechanisms</i>	Status	Active	Strengthened	↑	Includes waste and e-waste governance

16.2.4 Infrastructure and Digital Sustainability Metrics

<i>Indicator</i>	<i>Unit / Status</i>	<i>FY 2024–25</i>	<i>FY 2025–26</i>	<i>Trend</i>	<i>Notes</i>
<i>Green Building Certification</i>	Status	[Platinum / In progress]	[Platinum / Maintained]	↑	Linked to sustainable infrastructure
<i>Green Data Centre / Energy-Efficient IT</i>	Status	Maintained	Maintained	↑	Supports efficient digital operations
<i>Cloud Adoption</i>	% / Status	100%	100%	↑	Supports digital optimization
<i>Virtualization and Infrastructure Optimization</i>	Status	Active	Strengthened	↑	Supports reduced infrastructure intensity
<i>Green IT Framework</i>	Status	Emerging	Strengthened	↑	Linked to sustainable technology operations
<i>Digital Carbon Reduction Initiatives</i>	Status	Emerging	Strengthening	↑	Linked to cloud, infrastructure and IT lifecycle practices





16.3 Labour, Human Rights and Social Performance Dashboard

16.3.1 Workforce and Diversity Metrics

Indicator	Unit	FY 2024–25	FY 2025–26	Trend	Notes
<i>Total Employees</i> ⁵¹	Count	610	520	—	Global workforce
<i>Women Workforce</i>	%	35%	39%	↑	Linked to DEI focus
<i>Women in Leadership</i>	%	31%	36%	↑	Leadership pipeline and representation
<i>Employee Turnover</i> ⁵²	%	12%	10%	↓	Talent retention indicator
<i>Employees covered with Parental Leave</i> ⁵³	%	100%	100%	↑	Workforce continuity and inclusion indicator
<i>Employees Covered by Health and Wellbeing Benefits</i>	%	100%	100%	Maintained	Linked to employee welfare practices
<i>Percentage of employees receiving regular performance and career development reviews</i> ⁵⁴	%	100%	100%	Maintained	

⁵¹ GRI 401-1 Employees

⁵² GRI 401-1 Turnover

⁵³ GRI 401-3 Parental leave

⁵⁴ GRI 404-3





16.3.2 Learning, Awareness and Capability Development Metrics

Indicator	Unit	FY		Trend	Notes
		2024–25	FY 2025–26		
Average Training Hours per Employee	Hours/Employee	~45	~60+ ⁵⁵	↑	Includes capability development and awareness programs
Employees Trained	%	100%	100%	↑	Coverage of learning initiatives
Compliance Training Coverage	%	100%	100%	↑	Includes BCMS, cybersecurity, privacy and compliance topics
Information Security Awareness Coverage	%	100%	100%	↑	Linked to digital trust culture
Privacy and Data Protection Training Coverage	%	100%	100%	↑	Supports responsible data handling
Responsible Technology / AI Awareness Leadership	Status	Emerging	Strengthened	↑	Linked to responsible digital behaviour
Development Participation	Count / %	40%	50%	↑	Supports capability pipeline

16.3.3 Employee Wellbeing and Engagement Metrics

Indicator	Unit	FY		Trend	Notes
		2024–25	2025–26		
Wellbeing Programs Conducted	Count	30+	50+	↑	Includes yoga, health, wellness and awareness initiatives

⁵⁵ GRI 404-1





<i>Employee Participation in Wellbeing Initiatives</i>	% / Count	60%	80%	↑	Engagement metric
<i>Healthcare Partnerships</i>	Status	Active	Active	—	Includes hospital / healthcare partnerships
<i>Employee Engagement Initiatives</i>	Count	30+	40+	↑	Includes culture, volunteering and participation initiatives
<i>Employee Volunteering Participation</i>	Count	50+	100+	↑	Linked to social impact and engagement
<i>Awareness Campaigns Conducted</i>	Count	40+	50+	↑	Includes ESG, health, inclusion, cyber and compliance themes

Employee wellbeing and engagement initiatives continue to contribute toward a collaborative, participative, and resilient organizational culture. These programs support morale, workplace connectedness, social participation, and long-term employee sustainability.

16.3.4 Human Rights and Ethics Metrics

<i>Indicator</i>	<i>Unit</i>	<i>FY 2024–25</i>	<i>FY 2025–26</i>	<i>Trend</i>	<i>Notes</i>
<i>Human Rights Violations</i>	Count	0	0	—	Strong indicator of responsible workplace practices
<i>Child Labour / Forced Labour Incidents</i>	Count	0	0	—	Mandatory human rights disclosure
<i>Modern Slavery Incidents</i>	Count	0	0	—	Linked to human rights governance
<i>Discrimination Incidents Resulting in Major Action</i>	Count	0	0	—	Workplace conduct indicator
<i>Grievances Reported</i>	Count	0	0	—	Internal grievance mechanism
<i>Grievances Resolved</i>	%	0	0	↑	Closure and responsiveness metric





<i>POSH / Workplace Conduct Framework</i>	Status	Active	Stronger	↑	Supports safe and respectful workplace

16.4 Ethics, Compliance and Governance Dashboard

16.4.1 Ethics and Compliance Metrics

<i>Indicator</i>	<i>FY 2024–25</i>	<i>FY 2025–26</i>	<i>Trend</i>	<i>Notes</i>
<i>Corruption / Bribery Incidents</i>	0	0	—	Strong governance indicator
<i>Confirmed Fraud Incidents</i>	0	0	—	Linked to ethics and internal controls
<i>Material Compliance Violations</i>	0	0	—	Regulatory and governance indicator
<i>Whistleblower Mechanism</i>	Active	Active	Maintained	Enables confidential reporting
<i>Non-Retaliation Policy</i>	Enforced	Enforced	Maintained	Supports speak-up culture
<i>Code of Conduct Implementation</i>	Organization-wide	Organization-wide	Maintained	Core governance framework
<i>Ethics / Compliance Awareness Coverage</i>	High	High	Maintained	Supports responsible conduct

16.4.2 Information Security, Privacy and Digital Trust Metrics⁵⁶

<i>Indicator</i>	<i>FY 2024–25</i>	<i>FY 2025–26</i>	<i>Trend</i>	<i>Notes</i>
<i>Data Breach Incidents</i>	0	0	—	Customer privacy and data protection indicator
<i>Substantiated Customer Privacy Complaints</i>	0	0	—	Strong digital trust indicator
<i>Regulatory Actions Relating to Data Breaches</i>	0	0	—	No reported actions during the period

⁵⁶ GRI 418-1





<i>Monetary Losses Relating to Data Breaches</i>	0	0	—	No reported monetary losses
<i>ISO 27001 Information Security Framework</i>	Maintained	Maintained	Maintained	Supports governance and customer trust
<i>Cybersecurity Awareness Programs</i>	Regular	Regular / Expanded	↑	Supports digital risk preparedness
<i>Privacy and Data Protection Training Management</i>	Active	Strengthened	↑	Supports responsible data handling
<i>Reviews on Security and Privacy</i>	Conducted	Conducted	Maintained	Governance oversight mechanism
<i>Responsible AI Governance</i>	Emerging	Stronger	↑	Linked to responsible technology adoption

Digital trust represents one of SunTec’s strongest ESG differentiators. The organization’s information security, privacy, cybersecurity, responsible data processing, and product responsibility practices support customer confidence, regulatory alignment, and operational resilience.

16.5 Sustainable Procurement Dashboard

<i>Indicator</i>	<i>FY 2024–25</i>	<i>FY 2025–26</i>	<i>Trend</i>	<i>Notes</i>
<i>Supplier Code of Conduct</i>	Implemented	Implemented	Maintained	Defines supplier ESG and governance expectations
<i>Sustainable Procurement Policy</i>	Implemented	Strengthened	↑	Integrates ESG into procurement decisions
<i>ESG Criteria in Supplier Onboarding</i>	Integrated / Emerging	Strengthened	↑	Supports responsible supplier selection
<i>Supplier ESG Awareness</i>	Initiated	Expanding	↑	Supports supplier capability and alignment
<i>Supplier Segmentation Model</i>	In development	In progress	↑	Supports risk-based supplier management
<i>ESG Risk Assessment Framework</i>	In progress	Expanding	↑	Supports supplier due diligence





<i>Supplier Evaluation Framework</i>	Expanding	Strengthened	↑	Supports monitoring and accountability
<i>Inclusion of ESG in Procurement Decisions</i>	Increasing	Increasing	↑	Supports responsible sourcing
<i>Engagement with Responsible Vendors</i>	Active	Active	Maintained	Supports sustainable supplier ecosystem
<i>Inclusive / Diverse Supplier Focus</i>	Emerging	Strengthening	↑	Supports supplier diversity and local sourcing

Supplier governance is an important future maturity area for SunTec. The organization’s Supplier Code of Conduct, Sustainable Procurement Policy, supplier diversity focus, ESG-linked onboarding, and evolving supplier risk assessment mechanisms are helping lay the foundation for a more transparent, accountable, inclusive, and resilient supply chain.

16.6 Product Responsibility and Responsible Technology Dashboard

<i>Indicator</i>	<i>FY 2024–25</i>	<i>FY 2025–26</i>	<i>Trend</i>	<i>Notes</i>
<i>Secure Product Engineering Practices</i>	Active	Strengthened	↑	Supports privacy and security by architecture
<i>Privacy-by-Design Practices</i>	Active	Strengthened	↑	Supports responsible data processing
<i>SaaS / Cloud-Ready Product Capabilities</i>	Available	Expanded	↑	Supports scalable and flexible deployments
<i>BIAN Alignment / Architecture Conformance Work</i>	Active	Strengthened	↑	Supports interoperability and open architecture
<i>Client-Controlled Deployment Environments</i>	Available	Available	Maintained	Reduces data exposure and supports customer control
<i>Responsible AI Governance</i>	Emerging	Strengthened	↑	Supports ethical and secure technology usage





Green IT / Digital Sustainability Integration

Emerging

Ongoing

↑

Supports sustainable digital operations

SunTec’s product responsibility approach reflects the convergence of innovation, trust, security, privacy, regulatory adaptability, interoperability, and sustainability. Continued investment in product modernization, cloud readiness, secure architecture, responsible technology governance, and Green IT positions SunTec as a responsible and future-focused technology provider.

16.7 ESG Targets and Milestones Tracker

<i>Area</i>	<i>Target / Milestone</i>	<i>Timeline</i>	<i>Current Status</i>	<i>Strategic Significance</i>
<i>Scope 2 Emissions</i>	Reduce Scope 2 emissions by 20–25%	2027	On track	Supports climate transition and energy efficiency
<i>Renewable Energy⁵⁷</i>	Increase renewable energy share to 25%+	2027	In progress	Supports low-carbon operations
<i>Energy Intensity</i>	Improve energy efficiency per employee / facility area	2027	In progress	Supports resource optimization
<i>Water Efficiency</i>	Reduce water intensity and strengthen water management	2027	In progress	Supports responsible resource use
<i>Waste and Circularity</i>	Increase recycling and circularity practices	2027	In progress	Supports waste diversion and resource recovery
<i>E-Waste Management</i>	Maintain 100% responsible e-waste disposal through authorized channels	Ongoing	On track	Supports responsible IT lifecycle management
<i>Training Hours</i>	Progress toward 80 hours of learning per employee	2027	In progress	Supports workforce capability and resilience
<i>Women Workforce</i>	Maintain 30%+ women representation	Ongoing	On track	Supports DEI and inclusive workforce development
<i>Employee Wellbeing</i>	Expand wellbeing, health, and engagement programs	Ongoing	On track	Supports employee resilience and culture
<i>Human Rights</i>	Maintain zero child labour, forced labour, and human rights violation incidents	Ongoing	On track	Supports responsible workplace and supply chain governance

⁵⁷ GRI 2-22





<i>Ethics and Compliance</i>	Maintain zero corruption and bribery incidents	Ongoing	On track	Supports ethical governance
<i>Data Privacy</i>	Maintain zero substantiated customer privacy complaints	Ongoing	On track	Supports digital trust
<i>Information Security</i>	Maintain ISO 27001-aligned governance and strengthen cyber resilience	Ongoing	On track	Supports secure operations and customer confidence
<i>Responsible AI</i>	Strengthen AI usage governance and awareness	2026–2027	In progress	Supports responsible technology adoption
<i>Supplier ESG Integration</i>	Expand supplier ESG onboarding, monitoring and risk assessment coverage	2030	Early stage	Supports responsible supply chain maturity
<i>Supplier Diversity</i>	Strengthen local, MSME and diverse supplier participation	2030	Emerging	Supports inclusive economic participation
<i>Product Responsibility</i>	Continue investment in secure, scalable, interoperable and sustainable product modernization	Ongoing	On track	Supports customer value and digital responsibility
<i>Green IT</i>	Strengthen sustainable digital infrastructure	2027–2030	In progress	Supports digital sustainability

This tracker reflects SunTec’s transition from ESG implementation to ESG performance management. It allows leadership, employees, customers, and stakeholders to view sustainability not only as a set of initiatives, but as a measurable journey with milestones, accountability, and long-term direction.

16.8 ESG Maturity Assessment

<i>ESG Area</i>	<i>Current Maturity</i>	<i>Direction of Travel</i>	<i>Priority for Next Phase</i>
<i>Governance and Ethics</i>	Established	Strengthening	Maintain zero-incident culture and expand ESG governance reporting
<i>Digital Trust and Privacy</i>	Established and Strategic	Strengthening	Expand metrics, responsible AI governance and third-party controls
<i>Product Responsibility</i>	Strategic Differentiator	Strengthening	Advance interoperability, secure architecture and sustainable digital operations
<i>Workforce and Wellbeing</i>	Established	Expanding	Strengthen DEI, wellbeing measurement and leadership capability





<i>Learning and Awareness</i>	Established	Expanding	Progress toward higher annual learning hours and broader coverage
<i>Environment</i>	Strengthening	Improving	Expand emissions tracking, renewable energy and climate transition planning
<i>Waste and Circularity</i>	Strengthening	Improving	Improve circular procurement, recycling and lifecycle measurement
<i>Sustainable Procurement</i>	Developing	Improving	Expand supplier ESG assessments, monitoring and diversity metrics
<i>Community Impact</i>	Expanding	Improving	Strengthen impact measurement and beneficiary tracking

This maturity view provides a clear basis for future ESG prioritization. It confirms that SunTec has a strong governance, technology, and people foundation, while also identifying the need to further strengthen environmental data depth, supplier ESG coverage, impact measurement, and long-term milestone tracking.

16.9 Notes on Data Boundaries and Methodology

Environmental data is aligned with recognized greenhouse gas accounting principles and is progressively being strengthened across Scope 1, Scope 2, and selected Scope 3 categories. Metrics are derived from internal systems, operational tracking, facilities data, HR systems, learning platforms, policy records, compliance systems, and program-level reporting.

Certain metrics, particularly supplier ESG performance, Scope 3 categories, digital sustainability indicators, and circular economy measures, are under progressive development. SunTec recognizes that ESG data quality and coverage improve over time as systems, processes, ownership, and reporting boundaries mature.

The organization intends to continue improving metric accuracy, evidence quality, data consistency, reporting coverage, and trend analysis as part of its ESG maturity journey.

16.10 Future Outlook

SunTec’s ESG journey is entering a more performance-oriented phase. The next stage of maturity will focus on improving measurement quality, expanding data coverage, strengthening milestone tracking, and embedding ESG performance more deeply into business planning, operational reviews, supplier governance, technology strategy, and leadership oversight.

Key future priorities include strengthening climate and energy measurement, expanding Scope 3 coverage, improving renewable energy tracking, enhancing supplier ESG integration,





expanding diversity and inclusion measurement, deepening product responsibility metrics, strengthening responsible AI governance, improving Green IT and digital sustainability indicators, and increasing the quality of community impact measurement.

Through this integrated approach, SunTec aims to ensure that ESG performance is not viewed as a standalone reporting exercise, but as a measurable management system that supports responsible growth, operational resilience, customer trust, employee engagement, supplier accountability, environmental stewardship, and long-term stakeholder value creation.



17. Looking Ahead for the next year

As sustainability expectations continue to evolve, SunTec remains committed to strengthening ESG integration across its business operations, products, supply chain, and stakeholder ecosystem. Building upon the foundations established during FY 2026, the organization will focus on enhancing ESG maturity, improving transparency, strengthening accountability, and creating long-term sustainable value.

Key priorities for FY 2027 include:

- Strengthening ESG governance, monitoring, and performance management.
- Expanding supplier ESG engagement and sustainable procurement practices.
- Enhancing environmental data collection, measurement, and reporting capabilities.
- Advancing resource efficiency and environmental stewardship initiatives.
- Strengthening diversity, inclusion, employee well-being, and talent development programs.
- Expanding stakeholder awareness and ESG engagement initiatives.
- Enhancing privacy, cybersecurity, and digital trust capabilities.
- Strengthening responsible AI governance and oversight mechanisms.
- Increasing ESG reporting maturity and alignment with evolving stakeholder expectations.
- Advancing supply chain transparency, resilience, and accountability.

As SunTec continues its ESG journey, the organization remains committed to integrating sustainability into decision-making, fostering innovation, promoting responsible growth, and delivering positive outcomes for customers, employees, partners, communities, and the environment.



18. SunTec Policy Framework⁵⁸

SunTec recognizes that robust policies and governance frameworks form the foundation of effective environmental, social, and governance (ESG) performance. As the organization continues to strengthen its sustainability journey, policies serve as key instruments for translating corporate values, stakeholder expectations, regulatory requirements, and business objectives into consistent organizational practices.

During CY2025, SunTec further enhanced its policy ecosystem to support responsible business conduct, ethical decision-making, environmental stewardship, employee well-being, sustainable procurement, information security, privacy protection, and responsible technology adoption. These policies establish clear expectations, accountability mechanisms, and management processes that guide employees, leadership, suppliers, and business partners across the organization.

The policy framework is designed to support long-term resilience, operational excellence, stakeholder trust, and sustainable value creation while ensuring alignment with internationally recognized ESG principles and best practices.

SunTec ESG Policy Framework⁵⁹

<i>ESG Pillar</i>	<i>Key Policies and Frameworks</i>	<i>Purpose</i>
<i>Governance and Ethics</i>	ESG Policy, Code of Conduct, Anti-Bribery and Anti-Corruption Policy, Conflict of Interest Policy, Whistleblower Policy, Risk Management Framework, Business Continuity Policy	Promote ethical conduct, accountability, transparency, compliance, risk management, and responsible decision-making across the organization.
<i>People and Culture</i>	Human Rights Policy, Diversity, Equity and Inclusion Policy, Equal Opportunity Framework, Prevention of Sexual Harassment (POSH) Policy, Learning and Development Framework, Employee Well-being Programs	Foster a safe, inclusive, respectful, and empowering workplace that supports employee growth, well-being, diversity, and human rights.
<i>Environment</i>	Environmental Policy, Resource Conservation Practices, Waste Management Guidelines, Environmental Awareness Programs, Green Workplace Initiatives	Support environmental stewardship through responsible resource use, waste reduction, awareness building, and continuous improvement of environmental performance.
<i>Responsible Procurement</i>	Sustainable Procurement Policy, Supplier Code of Conduct, Responsible Sourcing Guidelines,	Integrate sustainability considerations into procurement decisions and

⁵⁸ GRI 2-23

⁵⁹ GRI 2-25





Digital Trust and Technology Governance

Supplier ESG Expectations and Risk Assessment Practices	promote responsible practices throughout the supply chain.
Information Security Policy, Privacy Policy, Data Protection Framework, Cybersecurity Controls, AI Usage and Governance Policy, Technology Governance Framework	Safeguard information assets, protect privacy, strengthen cybersecurity resilience, and ensure responsible and ethical use of emerging technologies.

Integrating Policies into Operations

SunTec's policy framework is supported through governance mechanisms, employee awareness programs, training initiatives, management oversight, periodic reviews, and continuous improvement processes. Policies are communicated across the organization and are reinforced through operational procedures, internal controls, leadership accountability, and employee engagement initiatives.

The organization periodically reviews and updates its policies to reflect evolving business needs, stakeholder expectations, technological advancements, regulatory developments, and emerging ESG priorities. This approach helps ensure that the policy framework remains relevant, effective, and aligned with SunTec's commitment to responsible business practices.

Through this integrated policy framework, SunTec seeks to strengthen organizational resilience, foster a culture of integrity and inclusion, protect information and privacy, support environmental responsibility, promote ethical business conduct, and create sustainable value for all stakeholders.



19. External Assurance⁶⁰

Assessment Period: FY 2024–26

Date of Issue: June 2026

Prepared by: Mahadevan Krishna Iyer; Independent ESG & Management Systems Auditor

Professional Qualifications

- ESG – Basic Fundamentals
- Integrated Management Systems (IMS) Auditor
- ISO 9001 Auditor
- ISO 14001 Auditor
- ISO 45001 Auditor
- Process Safety Professional

1. EXECUTIVE SUMMARY

SunTec Business Solutions Private Limited commissioned an Independent Sustainability Assessment and ESG Review to evaluate the maturity, implementation, and effectiveness of its Environmental, Social, and Governance (ESG) management framework.

The assessment was undertaken to review governance structures, sustainability policies, operational controls, labor and human rights practices, ethical business conduct mechanisms, sustainable procurement practices, environmental stewardship initiatives, and ESG reporting processes.

The review included an examination of documented policies, management systems, sustainability disclosures, supporting records, performance metrics, certifications, and evidence provided during the assessment period.

Based on the procedures performed and evidence reviewed, SunTec has established a structured ESG management framework supported by documented governance mechanisms, operational processes, management controls, employee engagement initiatives, sustainability objectives, and performance monitoring practices.

The organization demonstrates a systematic approach to integrating sustainability considerations into business operations and stakeholder engagement activities.

2. AUDITOR INDEPENDENCE STATEMENT

I confirm that this assessment was conducted independently and objectively based on information, records, policies, procedures, reports, disclosures, and supporting evidence made available during the review process.

I further confirm that I do not hold operational responsibility for the implementation or management of the ESG programs reviewed and have exercised professional judgement throughout the assessment.

⁶⁰ GRI 2-5

The conclusions contained within this report are based solely on the scope of work performed and evidence reviewed during the assessment period.

3. OBJECTIVE OF ASSESSMENT

The objectives of this assessment were to:

- Evaluate the maturity of the organization's ESG management framework.
- Assess the adequacy and effectiveness of ESG governance arrangements.
- Review implementation of ESG-related policies and procedures.
- Evaluate sustainability-related controls, monitoring mechanisms, and disclosures.
- Identify opportunities for continuous improvement.
- Provide an independent opinion regarding the ESG management practices of the organization.

4. SCOPE OF ASSESSMENT

The assessment covered the following areas:

Governance

- ESG governance framework
- Sustainability objectives and commitments
- Risk management practices
- Policy architecture and oversight mechanisms

Environment

- Environmental management practices
- Energy management initiatives
- Greenhouse gas emissions monitoring
- Resource efficiency initiatives
- Waste management practices
- Environmental compliance controls

Labour & Human Rights

- Employee wellbeing
- Diversity, Equity & Inclusion
- Occupational health and safety
- Learning and development
- Human rights commitments
- Employee engagement practices

Ethics, Privacy & Information Security

- Code of Conduct
- Anti-corruption controls

- Conflict of interest management
- Information security controls
- Data privacy management
- Business continuity arrangements

Sustainable Procurement

- Sustainable procurement governance
- Supplier Code of Conduct
- Supplier ESG expectations
- Supplier assessment mechanisms

ESG Reporting

- Sustainability reporting processes
- Materiality assessment
- ESG performance monitoring
- Sustainability disclosures

5. ASSESSMENT METHODOLOGY

The assessment was performed using a risk-based review approach and included:

- Review of ESG policies and procedures
- Review of sustainability disclosures and reports
- Evaluation of governance documentation
- Assessment of management systems and operational controls
- Review of supporting records and evidence
- Review of sustainability metrics and performance information
- Discussions and clarification sessions with management representatives were required

The assessment was conducted through document review and evidence validation procedures and did not constitute a statutory, financial, or certification audit.

6. ASSESSMENT CRITERIA AND REFERENCE FRAMEWORKS

The assessment considered alignment with recognized sustainability principles and frameworks including:

- United Nations Global Compact (UNGC)
- United Nations Sustainable Development Goals (SDGs)
- Global Reporting Initiative (GRI)
- Sustainability Accounting Standards Board (SASB)
- EcoVadis Sustainability Themes

- ISO 20400 Sustainable Procurement Guidance
- Applicable statutory and regulatory requirements
- Generally accepted ESG and sustainability management practices

7. DOCUMENTS AND EVIDENCE REVIEWED

The review included, but was not limited to:

- ESG Report FY 2024–26
- ESG Policy
- Environment Policy
- Human Rights Policy
- Diversity, Equity & Inclusion Policy
- Sustainable Procurement Policy
- Supplier Code of Conduct
- Occupational Health & Safety Documentation
- Talent Management Policies
- Information Security Policies
- Data Privacy Policies
- Business Continuity Documentation
- Risk Assessment Records
- Employee Wellbeing Programs
- Sustainability Metrics and Reports
- Supplier Assessment Documentation
- Governance and Compliance Records
- Supporting evidence made available during the review period

8. ASSESSMENT FINDINGS

8.1 Governance

Assessment Result

Advanced

Observations

The assessment identified a documented governance framework supported by approved policies, assigned responsibilities, oversight mechanisms, and periodic sustainability performance monitoring processes.

ESG-related responsibilities have been integrated across relevant functions, and sustainability objectives have been incorporated into organizational planning and reporting processes.



8.2 Environment

Assessment Result

Advanced

Observations

Environmental management practices have been institutionalized through documented policies, operational procedures, performance monitoring mechanisms, and sustainability initiatives focused on resource efficiency and environmental stewardship.

The organization has implemented processes relating to energy management, emissions monitoring, waste management, and environmental awareness initiatives.

8.3 Labour & Human Rights

Assessment Result

Advanced

Observations

The organization has established policies and programs addressing employee wellbeing, diversity and inclusion, workplace conduct, learning and development, occupational health and safety, and human rights.

Mechanisms exist for employee engagement, feedback, grievance management, and workforce development.

8.4 Ethics, Privacy and Information Security

Assessment Result

Advanced

Observations

A documented ethics and compliance framework is in place, supported by policies relating to business conduct, information security, privacy management, conflict of interest, and anti-corruption requirements.

Appropriate information security and business continuity controls have been established and maintained.

8.5 Sustainable Procurement

Assessment Result

Developing to Advanced

Observations



The organization has established a sustainable procurement framework supported by a Sustainable Procurement Policy and Supplier Code of Conduct.

Supplier sustainability expectations have been incorporated into procurement processes and supplier evaluation activities.

8.6 ESG Reporting and Disclosures

Assessment Result

Advanced

Observations

The organization publicly communicates sustainability information and has established processes for ESG reporting, materiality assessment, and sustainability performance monitoring.

The reporting framework demonstrates alignment with recognized sustainability reporting practices.

9. ESG MATURITY ASSESSMENT

<i>ESG Area</i>	<i>Assessment Result</i>	<i>Maturity Rating</i>
Governance	Effective	Advanced
Environment	Effective	Advanced
Labor & Human Rights	Effective	Advanced
Ethics & Compliance	Effective	Advanced
Information Security & Privacy	Effective	Advanced
Sustainable Procurement	Effective	Developing–Advanced
ESG Reporting & Disclosures	Effective	Advanced

10. OPPORTUNITIES FOR IMPROVEMENT

<i>Area</i>	<i>Improvement Opportunity</i>
Sustainable Procurement	Expand supplier ESG assessments and supplier engagement activities
Environment	Strengthening climate transition planning and emissions reduction initiatives
Reporting	Enhance KPI validation and independent review mechanisms
Governance	Further strengthen ESG performance dashboards and periodic management reviews
Supplier Management	Expand sustainability performance monitoring and corrective action tracking

11. INDEPENDENT AUDITOR OPINION

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Based on the scope of work performed and evidence reviewed, it is my professional opinion that SunTec Business Solutions Private Limited has established and implemented management systems, governance mechanisms, policies, procedures, and operational controls addressing Environmental, Social, and Governance topics relevant to its business operations.

The organization demonstrates a mature ESG governance structure supported by documented policies, measurable sustainability initiatives, employee engagement programs, information security controls, ethical business practices, supplier governance mechanisms, and sustainability reporting processes.

No material deficiencies were identified that would indicate the absence of an effective ESG management framework within the scope of this assessment.

Continued enhancement of supplier sustainability oversight, climate-related performance management, ESG data validation processes, and sustainability performance analytics is recommended to further strengthen ESG maturity.

12. AUDITOR DECLARATION

I hereby certify that this assessment was conducted independently based on documentation, records, policies, reports, disclosures, and supporting evidence made available during the review period.

The conclusions contained in this report represent my professional assessment of the ESG management framework within the defined scope of assessment and should not be construed as a statutory audit, financial audit, certification audit, or assurance engagement over every underlying data point.

Mahadevan Krishna Iyer

Independent ESG & Management Systems Auditor

Signature: _____

Date: _____

Place: Trivandrum, Kerala

APPENDIX A – AUDITOR PROFILE

Mahadevan Krishna Iyer

Independent ESG & Management Systems Auditor

Professional Qualifications

- ESG – Basic Fundamentals
- Integrated Management Systems (IMS) Auditor
- ISO 9001 Auditor
- ISO 14001 Auditor
- ISO 45001 Auditor
- Process Safety Professional
- PDIS
- ADIS

Professional Profile

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Mahadevan Krishna Iyer is an independent ESG and management systems professional with training and certifications in Environmental, Social and Governance principles, integrated management systems, quality management systems, environmental management systems, occupational health and safety management systems, and process safety disciplines. His areas of interest include sustainability management, governance frameworks, management systems, operational controls, compliance practices, risk management, business continuity, and ESG-related assessments.



20. GRI, SASB, and Ecovadis Content index

20.1 GRI content index

Statement of use	SunTec Business Solutions Pvt. Ltd has reported with reference to the GRI Standards for the period 1 st April 2024 to 31 st March 2026 SunTec Business Solutions Pvt. Ltd has reported the information cited in this GRI content index for the period 1 st April 2024 to 31 st March 2026 with reference to the GRI Standards
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	Not applicable

GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirements omitted	Reason	Explanation	
General Disclosures						
GRI 2: General Disclosures 2021	2-1 Organizational details	5.1, pg. 35	-	-	-	Nil
	2-2 Entities included in the organization's sustainability reporting	1, pg. 14	-	-	-	Nil
	2-3 Reporting period, frequency and contact point	1, pg. 14	-	-	-	Nil
	2-4 Restatements of information	Nil	-	-	-	Nil
	2-5 External assurance	4, pg. 186	-	-	-	Nil
	2-6 Activities, value chain and other business relationships	5.3, pg. 36	-	-	-	Nil
	2-7 Employees	4.8, pg. 33	-	-	-	Nil
	2-8 Workers who are not employees	4.7.5, pg. 32	-	-	-	Nil
	2-9 Governance structure and composition	10.1, pg. 70	-	-	-	Nil
	2-10 Nomination and selection of the highest governance body	10.1, pg. 69	-	-	-	Nil
	2-11 Chair of the highest governance body		-	-	-	Nil
	2-12 Role of the highest governance body in overseeing the management of impacts		-	-	-	Nil
	2-13 Delegation of responsibility for managing impacts		-	-	-	Nil
	2-14 Role of the highest governance body in sustainability reporting	10.3, pg. 71	-	-	-	Nil
	2-15 Conflicts of interest	10.1, pg. 69	-	-	-	Nil
	2-16 Communication of critical concerns	10.3, pg. 71	-	-	-	Nil
	2-17 Collective knowledge of the highest governance body	10.1, pg. 69	-	-	-	Nil
	2-18 Evaluation of the performance of the highest governance body	10.1, pg. 69	-	-	-	Nil
	2-19 Remuneration policies	12.12, pg. 108	-	-	-	Nil
	2-20 Process to determine remuneration	12.12, pg. 108	-	-	-	Nil
	2-21 Annual total compensation ratio	Nil	-	-	Not available	Nil
	2-22 Statement on sustainable development strategy	2.1, pg.17; 6.3 – pg. 39; 11.7 – pg. 86;	-	-	Statement of sustainable energy and targets	Nil



GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirements omitted	Reason	Explanation	
		11.11 – pg. 88; 16.7 – pg. 179;				
	2-23 Policy commitments	11.12 – pg. 90; 12.7 – pg. 103; 18 – pg. 184	-	-	Policy Frameworks	Nil
	2-24 Embedding policy commitments	11.12 – pg. 90; 12.7 – pg. 103; 18 – pg. 184	-	-	Policy Frameworks	Nil
	2-25 Processes to remediate negative impacts	6.5.2- pg. 50, 10.4 – pg. 72, 10.5 – pg. 72, 12.7 – pg. 103, 18 – pg. 183	-	-	SunTec maintains a structured compliance management framework supported by policies, periodic reviews, training, audits, whistleblower mechanisms, and management oversight to ensure adherence to applicable legal, regulatory, and ethical requirements across its operations.	Nil
	2-26 Mechanisms for seeking advice and raising concerns	6.5.2- pg. 52, 10.4 – pg. 73, 10.5 – pg. 73, 12.7 – pg. 103, 18 – pg. 184	-	-		Nil
	2-27 Compliance with laws and regulations	10.4 – pg. 72	-	-	Applicable laws policy	Nil
	2-28 Membership associations	4.7.7 – pg. 33	-	-	Global commitment and memberships	Nil
	2-29 Approach to stakeholder engagement	9 – pg.65	-	-	Approach to materiality	Nil
	2-30 Collective bargaining agreements	Nil	-	-	By nature of our operation, collective bargaining is not applicable. We neither oppose nor do we discourage employees to avail collective bargaining.	Nil

STATEMENT OF USE	SunTec Business Solutions Pvt. Ltd has reported with reference to the GRI Standards for the period 1 st April 2022 to 31 st March 2024					
	SunTec Business Solutions Pvt. Ltd has reported the information cited in this GRI content index for the period 1 st April 2024 to 31 st March 2026 with reference to the GRI Standards					
GRI 1 USED	GRI 1: Foundation 2021					
APPLICABLE GRI SECTOR STANDARD(S)	Not applicable					
Disclosures	Disclosure	Location	Omission			Gri Sector Standard Ref. No
			Requirement(s) Omitted	Reason	Explanation	
Material Topics						
	3-1 Process to determine material topics	9, pg. 65	-	-	This highlights our approach	-



GRI 3: Material Topics 2021					and material topics	
	3-2 List of material topics	9 – pg. 65, 6.3 – pg. 39	-	-	This highlights our approach and material topics	-
	3-3 Management of material topics		-	-		-
Material Topic 01 - Energy efficiency and GHG emissions						
Management approach		11.5- pg. 84				
Topic-specific disclosure	302-1 Energy consumption within the organization	4.8 – pg. 33			Energy consumption in India	
	302-2 Energy consumption outside of the organization	NA	The data is limited to India Operations	Currently, we do not track Energy and emissions data for other sites	We are in process of putting systems in place to monitor the energy and emissions data	
	302-3 Energy intensity	4.8 – pg. 33				
	302-4 Reduction of energy consumption	11.5 – pg. 84			Actions taken to reduce energy consumption	
	305-1 Direct (Scope 1) GHG emissions	4.8, pg. 33	The data is limited to India Operations		Please refer to the metrics table, Reduction of GHG emissions is clearly visible	
	305-2 Energy indirect (Scope 2) GHG emissions					
	305-3 Other indirect (Scope 3) GHG emissions					
	305-4 GHG emissions intensity					
	305-5 Reduction of GHG emissions					
	305-6 Emissions of ozone-depleting substances (ODS)	Not applicable			Not applicable	
305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Not applicable			Not applicable		
Material Topic 02- Water management						
Management approach		11.7 – pg. 86				
Topic-specific disclosure	303-1 Interactions with water as a shared resource	11.7 – pg. 86	The data is limited to India and Dubai Operations			
	303-2 Management of water discharge-related impacts	11.15.5 – pg. 95				





	303-3 Water withdrawal	Nil			Not measured now	
	303 -4 Water Discharge	4.8 – pg. 33			Water consumption and recycled water	
	303-5 Water consumption					
Material Topic 03 - Waste						
Management approach		11.8 – pg. 86				
Topic-specific disclosure	306-1 Waste generation and significant waste-related impacts	11.8 – pg. 87	The data is limited to India	Currently, we do not have systems to track waste data for other sites	We are in process of putting systems in place to monitor the waste data	
	306-2 Management of significant waste related impacts	11.8 – pg. 86	The data is limited to India	Currently, we do not have systems to track waste data for other sites	We are in process of putting systems in place to monitor the waste data	
	306-3 Waste generated	11.2 – pg. 83	The data is limited to India	Currently, we do not have systems to track waste data for other sites	Environmental snapshot	
	306-4 Waste diverted from disposal					
	306-5 Waste directed to disposal					
Material Topic 04 - Talent Attraction, Retention and Upskilling/ Development						
Management approach						
Topic-specific disclosure	401-1 New employee hires and employee turnover	16.3.1- pg. 173	Turnover mentioned, new hire not mentioned and can be calculated		Turnover mentioned, new hire not mentioned and can be calculated	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Not mentioned			Will be mentioned from next report onwards	
	401-3 Parental leave	16.3.1- pg. 173			All employees are covered	
	404-1 Average hours of training per year per employee	16.3.2- pg. 174			Training hours per employee	
	404-2 Programs for upgrading employee skills and transition assistance programs	12.8 – pg. 104			Details of learning programs	





	404-3 Percentage of employees receiving regular performance and career development reviews	16.3.2 – pg. 174			Employees covered by said factors	
Material Topic 05 - Employee Health, Safety and Wellbeing						
Management approach		8.3 – pg. 60			Health and Wellbeing	
Topic-specific disclosure	403-1 Occupational health and safety management system	4.7.2 – pg. 31			Policy	
	403-2 Hazard identification, risk assessment, and incident investigation	10.6 – pg. 73			Our risk management policy	
	403-4 Worker participation, consultation, and communication on occupational health and safety	No			Not implemented	
	403-5 Worker training on occupational health and safety	4.4 – pg. 27			Example of similar campaign – fire drills	
	403-6 Promotion of worker health	6.3 – pg. 42/43 – Material topic 4 and 5; 4.1 – pg. 24			Material section that highlights our health related initiatives	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships					
	403-8 Workers covered by an occupational health and safety management system					
	403-9 Work-related injuries	No			Not applicable	
	403-10 Work-related ill health	No			Not applicable	
Material Topic 06 - Diversity, Equity and Inclusion						
Management approach						
Topic-specific disclosure	405-1 Diversity of governance bodies and employees					
	405-2 Ratio of basic salary and remuneration of women to men		Confidential		Not reported	
Material Topic 07 - Supply Chain Sustainability						
Management approach						
Topic-specific disclosure	308-1 New suppliers that were screened using environmental criteria	14.2 – pg.123			Data on procurement	
	308-2 Negative environmental impacts in the supply chain and actions				Not applicable	





	414-1 New suppliers that were screened using social criteria					
	414-2 Negative social impacts in the supply chain and actions taken				Not applicable	
Material Topic 08 - Corporate Social Responsibility						
Management approach					The Sneha section covers all details	
Topic-specific disclosure	413-1 Operations with local community engagement, impact assessments, and development programs	8 – pg. 57				
Material Topic 09 - Ethical business conduct						
Management approach		6.3 – pg. 46			Material topic details	
Topic-specific disclosure		6.3 – pg. 46			Material topic details	
Material Topic 10 - Business continuity and risks management						
Management approach		10.8 – pg. 75			Section on data privacy	
Topic-specific disclosure	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	16.4.2 – pg. 176			Data related to data privacy	
Material Topic 11 - Data privacy and Data security						
Management approach		10.8 – pg. 75			Section on data privacy	
Topic-specific disclosure	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	16.4.2 – pg. 176			Data related to data privacy	

20.2 SASB content index

Standard	Disclosure requirements	Report Section	Page No
SOFTWARE and IT SERVICES, 2018-10			
Environmental Footprint of Hardware Infrastructure	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	4.8 – Key Metrics	33
	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	4.8 – Key Metrics	34
	Discussion of the integration of environmental considerations into strategic planning for data centre needs	11.5.2 – Green Data Centre Strategy	94
	Percentage of employees that are (1) foreign nationals and (2) located offshore	Not reported	





Standard	Disclosure requirements	Report Section	Page No
Recruiting and Managing a Global diverse and skilled workforce	Employee engagement as a percentage	12.2 – Performance Indicators	98
	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	16.3.1 – Workforce and Diversity Practice	173
Data Privacy and Freedom of Expression	Description of policies and practices relating to behavioural advertising and user privacy	18 – Policy Frameworks listing all policy	183
	Number of users whose information is used for secondary purposes	Not reported as it is not applicable	
	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Not reported as it is not applicable	
	1) Number of law enforcement requests for user information, (2) number of users whose information was requested, (3) percentage resulting in disclosure	Not reported as it is not applicable	
	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	None of our products are subject to monitoring, blocking, content filtering, or censoring all our operational jurisdiction	
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	15.14 Product Responsibility Performance Indicators	168
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	6.3 – Progress against material topics – Material topic 11	48
Intellectual Property Protection and Competitive Behavior	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	Not reported as it is not applicable	
Managing Systemic Risks From Technology Disruptions	Number of (1) performance issues and (2) service disruptions; (3) total customer downtime	16.4.2 Information Security, Privacy and Digital Trust Metrics	176
	Description of business continuity risks related to disruptions of operations	10.6 Risk Management and Business Continuity	74
CONSUMER FINANCE – 2018-10			
Customer privacy	Number of account holders whose information is used for secondary purposes	Not reported as it is not applicable	
	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Not reported as it is not applicable	
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	16.4.2 Information Security, Privacy and Digital Trust Metrics	176
	Card-related fraud losses from (1) card-not present fraud and (2) card-present and other fraud	Not reported as it is not applicable	
	Description of approach to identifying and addressing data security risks	10.6 Risk Management and Business Continuity	74

20.3 Ecovadis Content Index

EcoVadis Theme	EcoVadis Indicator / Area	Relevant SunTec Disclosure	Report Section / Page Reference	Evidence Type
General	Company sustainability profile and	Reporting period, entities covered, India-focused	1. About this report, p.12	Reporting scope



	reporting scope	metrics boundary, global governance scope		
General	External sustainability commitments	UNGC, SDGs, GRI, SASB, EcoVadis, SME Climate Hub, UN WEPs	4.6 Global Commitments and Certifications, p.29; 6.4 External Sustainability Commitments, p.48	Endorsements / commitments
General	Materiality analysis	Materiality assessment framework, stakeholder inputs, prioritized ESG topics	9. Our Approach to Materiality, p.65	Materiality disclosure
General	Sustainability reporting standards	Report prepared with reference to GRI, SASB and EcoVadis principles	1. About this report, p.12; 20. GRI, SASB and EcoVadis content index, p.194	Reporting alignment
General	Quantitative sustainability KPIs	ESG metrics dashboard, environmental, social, governance, procurement and product responsibility dashboards	4.8 Key Metrics, p.33; 16. ESG Performance, Metrics, Milestones and Insights, p.170	KPI reporting
General	External assurance / verification	Independent external assurance covering ESG disclosures and selected indicators	19. External Assurance, p.186	External assurance
Environment	Environmental policy	Environmental commitment, environmental	11.1 Environmental Commitment, p.82; 11.12 Environmental	Policy



		governance and policy framework	Policy Framework, p.90	
Environment	Energy and GHG emissions	Scope 1, Scope 2, Scope 3 business travel, energy consumption, renewable energy, intensity reduction	4.8 Key Metrics, p.33; 11.5 Energy Management, p.84; 11.6 Climate Change and Emissions Management, p.85	KPIs / actions
Environment	Green building and infrastructure	IGBC Platinum certification, energy savings, water efficiency, green campus features	4.2 Environmental Highlights, p.25; 4.7.1 Environment Snapshot, p.31; 11.4 Sustainable Infrastructure and Green Campus, p.84	Certification / action
Environment	Water management	Water consumption, potable water reduction, wastewater treatment and reuse, rainwater harvesting	4.7.1 Environment Snapshot, p.31; 4.8 Key Metrics, p.33; 11.7 Water Stewardship, p.86	KPIs / actions
Environment	Waste management and circularity	Waste generated, recycling rate, e-waste disposal, waste reduction practices	4.8 Key Metrics, p.33; 11.8 Waste Management and Circularity, p.86; 11.11 Progress Against Environmental Commitments, p.88	KPIs / actions
Environment	Biodiversity	Campus forest, trees/shrubs, native landscape,	4.2 Environmental Highlights, p.25; 11.9 Biodiversity	Action / impact





		biodiversity conservation	and Greenspaces, p.87; 11.15.4 Campus Biodiversity Initiative, p.95	
Environment	Climate strategy and targets	Net Zero / carbon neutrality pathway, renewable energy roadmap, emissions reduction milestones	6.3 Material Topic 1, p.39; 11.14 Climate Strategy and Net Zero Pathway, p.92	Targets / roadmap
Environment	Environmental awareness	World Environment Day, Earth Hour, Water Day, beach clean-up, e-waste collection	8.5 Environmental Stewardship, p.62; 11.16 Environmental Awareness and Employee Participation, p.96	Actions
Labour & Human Rights	Labour and human rights policy	Human Rights Policy, DEI Policy, Talent Policy, OHS Policy, POSH Policy	12.4 Human Rights, p.99; 12.7 Governance and Policy Framework, p.103; 18. Policy Framework, p.184	Policy
Labour & Human Rights	Employee health and safety	OHS policy, health camps, CPR training, wellness initiatives, counselling support	4.1 Responsible Organization, p.24; 12.5 Employee Well-being and Support, p.100	Policy / actions
Labour & Human Rights	Working conditions	Health insurance, flexible work, leave support, recreational	4.7.2 People Snapshot, p.31; 12.5 Employee Well-being and Support, p.100;	Actions / benefits





		facilities, financial wellness support	12.12 Compensation Commitment, p.108	
Labour & Human Rights	Career management and training	Learning programs, technical/product training, leadership training, IDP and career development	12.8 Learning, Awareness and Capability Building, p.104; 16.3 Labour, Human Rights and Social Performance Dashboard, p.173	Actions / KPIs
Labour & Human Rights	Diversity, equity and inclusion	DEI framework, women workforce %, women leadership %, women on Board, WEP alignment	4.8 Key Metrics, p.33; 10.2 Board Diversity, p.70; 12.3 DEI, p.99	Policy / KPIs
Labour & Human Rights	Prevention of discrimination and harassment	POSH framework, grievance channels, zero tolerance commitments, mandatory POSH training	12.4 Human Rights, p.99; 12.11 Grievance Mechanisms and Ethical Conduct, p.107	Policy / actions
Labour & Human Rights	Child labour and forced labour prevention	Prohibition of child labour, supplier expectations, employee eligibility checks, supplier due diligence	10.12 Prohibition of Child Labour, p.80; 12.9 Human Rights and Ethical Labour Practices, p.105	Policy / due diligence
Labour & Human Rights	Employee voice and engagement	Town halls, feedback mechanisms, “Voice IT, Shape IT”, engagement initiatives, employee participation	12.3 DEI, p.99; 12.10 Employee Engagement and Community Participation, p.106	Actions



Labour & Human Rights	Community and CSR	SNEHA, education, healthcare, Wayanad relief, blood donation, community inclusion	8. SNEHA, p.57–64	Actions / CSR impact
Ethics	Ethics and compliance policy	Code of Conduct, anti-bribery, anti-corruption, applicable laws, whistleblower framework	10.4 Ethics, Integrity and Responsible Conduct, p.72; 13.5 Policy Framework, p.114	Policy
Ethics	Anti-corruption and bribery	Zero tolerance for bribery/corruption, conflict of interest management, zero confirmed corruption cases	10.4 Ethics, p.72; 13.7 Anti-Corruption and Ethical Practices, p.116	Policy / KPIs
Ethics	Whistleblower and grievance mechanism	Speak-up culture, confidential reporting, non-retaliation, zero whistleblower cases	10.5 Whistleblower and Speak-Up Culture, p.72; 13.9 Speak-Up Culture, p.117	Mechanism / KPIs
Ethics	Data privacy and information security	ISO 27001, privacy policy, breach notification, privacy by design, zero material data breaches	10.7 Data Privacy, Cybersecurity and Digital Trust, p.74; 13.10 Data Privacy, p.118	Certification / KPIs
Ethics	Cybersecurity awareness and controls	Phishing, deepfake, fraud prevention, cloud security, secure collaboration, incident readiness	4.4 Governance and Ethics Highlights, p.27; 13.8 Awareness and Capacity Building, p.116	Actions

Ethics	Business continuity and resilience	ISO 22301, BCMS, evacuation drills, emergency preparedness, crisis response	4.4 Governance and Ethics Highlights, p.27; 10.6 Risk Management and Business Continuity, p.73	Certification / actions
Ethics	Responsible AI	AI Usage Policy, ethical AI, human oversight, transparency, data privacy, secure AI use	10.9 Responsible AI Governance, p.77; 13.11 Responsible Technology and AI Governance, p.119	Policy / actions
Ethics	Compliance with laws and regulations	Applicable laws policy, global compliance reporting, zero penalties / violations disclosed	10.13 Compliance with Laws and Regulations, p.81	Policy / compliance
Sustainable Procurement	Sustainable procurement policy	Sustainable Procurement Policy, supplier governance, ESG integration in sourcing	14.1 Responsible Procurement, p.122; 14.3 Governance and Integration, p.124	Policy
Sustainable Procurement	Supplier Code of Conduct	Supplier expectations covering environment, labour, human rights, ethics, privacy, security and compliance	14.4 Supplier Code of Conduct, p.127	Policy / supplier expectations
Sustainable Procurement	Supplier onboarding and due diligence	Supplier due diligence covering governance, ethics, HR, labour, environment, security, privacy and resilience	14.5 Supplier Onboarding and Due Diligence, p.129	Due diligence process



Sustainable Procurement	Supplier risk assessment	Supplier segmentation by strategic, critical, high-risk, technology, local and MSME suppliers	14.6 Supplier Segmentation and Risk-Based Oversight, p.131	Risk management
Sustainable Procurement	Supplier engagement and capability building	Supplier awareness on ESG, ethics, human rights, information security, privacy, resilience and environment	14.7 Supplier Engagement and Capability Building, p.133	Actions
Sustainable Procurement	Inclusive sourcing	Local supplier engagement, MSME participation, supplier diversity and equitable opportunity	14.8 Sustainable and Inclusive Sourcing, p.135	Actions / inclusion
Sustainable Procurement	Green procurement and circular economy	Green IT, e-waste, IT asset lifecycle management, circular economy and supplier environmental responsibility	14.9 Green Procurement and Circular Economy Integration, p.138	Actions
Sustainable Procurement	Supplier cybersecurity and privacy	Third-party cybersecurity, privacy, business continuity and digital trust expectations	14.10 Supply Chain Cybersecurity, Privacy and Digital Trust, p.143	Governance controls
Sustainable Procurement	Supplier monitoring and continuous improvement	Supplier ESG monitoring, compliance reviews, corrective actions, evaluation and improvement process	14.11 Monitoring, Evaluation and Continuous Improvement, p.147	Monitoring process





Sustainable Procurement	Procurement KPIs	Supplier ESG assessment coverage, sustainable procurement dashboard and roadmap	4.8 Key Metrics, p.33; 16.5 Sustainable Procurement Dashboard, p.177; 14.12 Sustainable Procurement Roadmap, p.150	KPIs / roadmap
Product Responsibility / Digital Trust	Product responsibility	Responsible digital product, customer privacy, secure product design, product sustainability	15. Product Responsibility, Data Privacy and Digital Trust, p.155	Policy / actions
Product Responsibility / Digital Trust	Responsible innovation	SunTec Xelerate, BIAN alignment, privacy-by-architecture, responsible technology governance	15.2–15.8, p.156–162	Actions
Product Responsibility / Digital Trust	Product responsibility KPIs	Product responsibility and responsible technology performance indicators	15.14 Product Responsibility Performance Indicators, p.168; 16.6 Product Responsibility Dashboard, p.178	KPIs



Glossary

Term	Definition
AI Governance	The framework of policies, controls, and oversight mechanisms used to ensure that artificial intelligence is deployed ethically, securely, transparently, and responsibly.
Anti-Corruption	Measures designed to prevent bribery, fraud, improper payments, conflicts of interest, and other forms of unethical business conduct.
BCMS – Business Continuity Management System	A structured system for ensuring that critical business operations can continue during disruptions, emergencies, or crises.
BIAN – Banking Industry Architecture Network	A global banking standards body that promotes interoperability and standardization in banking technology architecture.
BIA – Business Impact Analysis	A process used to identify critical business functions, assess the impact of disruptions, and define recovery priorities.
Biodiversity	The variety of plant, animal, and ecological life within a particular environment. In the report, this refers especially to SunTec’s green campus, tree cover, native landscaping, and ecosystem conservation initiatives.
Carbon Neutrality	A state where greenhouse gas emissions are reduced and any remaining emissions are balanced through credible offsets or removals.
Circular Economy	An economic model focused on reducing waste, reusing materials, recycling resources, and extending the useful life of products and materials.
Climate Action	Measures taken to reduce greenhouse gas emissions, improve energy efficiency, adopt renewable energy, and manage climate-related risks.
Climate Risk	Business, operational, financial, or reputational risks arising from climate change, extreme weather events, regulation, or the transition to low-carbon operations.
Community Impact	The positive social contribution made through CSR, volunteering, education, healthcare, inclusion, disaster relief, and community development initiatives.
Corporate Governance	The system of structures, policies, processes, and accountability mechanisms through which an organization is directed and controlled.
CSR – Corporate Social Responsibility	A company’s responsibility to contribute positively to society through initiatives in areas such as education, healthcare, community welfare, environmental stewardship, and social inclusion.
Cybersecurity	The protection of systems, networks, data, applications, and digital infrastructure from unauthorized access, misuse, disruption, or attack.



Data Privacy	The responsible collection, use, storage, sharing, and protection of personal and sensitive information in accordance with applicable laws and internal policies.
DEI – Diversity, Equity & Inclusion	A framework for ensuring fair opportunity, inclusive participation, representation, and respect for people across gender, age, ability, background, and other dimensions of diversity.
Digital Trust	The confidence stakeholders place in an organization’s ability to protect data, secure systems, maintain privacy, ensure resilience, and use technology responsibly.
Disaster Recovery / DR	Plans and processes used to restore technology systems, data, and operations after a disruption or disaster.
EcoVadis	A global sustainability assessment platform that evaluates companies on environment, labour and human rights, ethics, and sustainable procurement.
Employee Engagement	The level of involvement, motivation, connection, and participation employees demonstrate in organizational initiatives, culture, and performance.
Employee Wellbeing	Programs and practices that support the physical, mental, emotional, social, and financial health of employees.
Energy Efficiency	The practice of reducing energy consumption while maintaining or improving operational performance.
Environmental Responsibility	The organization’s commitment to minimizing environmental impact through energy management, emissions reduction, water conservation, waste management, biodiversity protection, and responsible resource use.
ESG – Environmental, Social and Governance	A framework used to assess how an organization manages environmental impact, social responsibility, and governance practices.
ESG Committee	The internal governance body responsible for guiding, overseeing, reviewing, and coordinating ESG initiatives and performance across the organization.
ESG Disclosure	The reporting of ESG-related policies, practices, performance metrics, risks, initiatives, and outcomes to stakeholders.
ESG Governance Framework	The structure of oversight, accountability, policies, committees, controls, and reporting mechanisms used to manage ESG priorities.
ESG Materiality	The process of identifying ESG topics that are most important to the business and its stakeholders.
ESG Metrics	Quantitative or qualitative indicators used to measure ESG performance, such as emissions, energy use, water consumption, diversity ratios, training hours, supplier assessment coverage, and whistleblower cases.
ESG Reporting	The structured communication of an organization’s ESG strategy, governance, initiatives, performance, targets, risks, and progress.



E-Waste	Discarded electrical or electronic equipment, such as computers, devices, peripherals, and related components, which must be handled through responsible disposal or recycling channels.
GHG – Greenhouse Gas Emissions	Gases such as carbon dioxide and methane that trap heat in the atmosphere and contribute to climate change.
GBCI – Green Business Certification Inc.	An organization that administers certification programs, including TRUE Zero Waste certification.
GDPR – General Data Protection Regulation	The European Union’s data protection regulation governing the processing, protection, and rights related to personal data.
Green Building	A building designed and operated to reduce environmental impact through energy efficiency, water conservation, sustainable materials, waste management, and occupant wellbeing.
Green Data Centre Strategy	An approach to improving the energy and resource efficiency of data centre infrastructure, including power consumption, cooling, optimization, and responsible technology operations.
GRI – Global Reporting Initiative	A widely used global framework for sustainability reporting, helping organizations disclose ESG impacts in a consistent and comparable manner.
Human Rights Due Diligence	The process of identifying, preventing, mitigating, and addressing risks related to human rights across operations and supply chains.
HVAC – Heating, Ventilation and Air Conditioning	Systems used for indoor climate control. In green building contexts, efficient HVAC systems help reduce energy consumption and emissions.
IGBC – Indian Green Building Council	An Indian certification body that evaluates green buildings on parameters such as energy efficiency, water conservation, sustainable site planning, waste management, and occupant wellbeing.
Information Security	The protection of information assets from unauthorized access, disclosure, modification, loss, or disruption.
ISMS – Information Security Management System	A structured management system for identifying, managing, and reducing information security risks. ISO 27001 is the globally recognized standard for ISMS.
ISO 9001	An international standard for Quality Management Systems, focused on process discipline, customer satisfaction, continuous improvement, and consistent service delivery.
ISO 22301	An international standard for Business Continuity Management Systems, focused on organizational resilience and continuity of critical operations.
ISO 27001	An international standard for Information Security Management Systems, focused on managing information security risks and protecting information assets.



KPI – Key Performance Indicator	A measurable indicator used to track progress against objectives, targets, or performance commitments.
L&D – Learning and Development	Training, upskilling, leadership development, compliance learning, technical capability building, and career development initiatives for employees.
Material Topic	An ESG issue that is significant to the organization’s business, stakeholders, risk profile, long-term value creation, or sustainability impact.
Materiality Assessment	A structured process for identifying and prioritizing ESG topics based on stakeholder importance and business impact.
Materiality Matrix	A visual tool that maps ESG topics according to their importance to stakeholders and impact on the business.
MSME – Micro, Small and Medium Enterprise	A category of smaller enterprises that may form part of a company’s supplier or partner ecosystem.
Native Landscaping	The use of locally adapted plant species that support biodiversity, reduce water requirements, and improve ecological resilience.
Net Zero	A state where greenhouse gas emissions are reduced as much as possible and any residual emissions are neutralized through credible removal or offset mechanisms.
Operational Resilience	The ability of an organization to prevent, withstand, respond to, and recover from disruptions while continuing to deliver critical services.
Paris Agreement	A global climate agreement aimed at limiting global warming and accelerating action to reduce greenhouse gas emissions.
PII – Personally Identifiable Information	Information that can be used to identify an individual, either directly or indirectly.
Policy Framework	The structured set of organizational policies that define expectations, controls, responsibilities, and governance practices across key business and ESG areas.
POSH – Prevention of Sexual Harassment	A workplace framework in India that seeks to prevent, prohibit, and redress sexual harassment at the workplace.
Potable Water	Water that is safe and suitable for drinking. In sustainability reporting, potable water reduction refers to reducing dependence on freshwater sources.
Privacy by Architecture	The integration of privacy principles into product, system, and process design from the outset rather than as a later compliance layer.
Product Responsibility	The obligation to design, develop, deliver, and maintain products in a secure, reliable, ethical, compliant, and customer-centric manner.
Rainwater Harvesting	The collection and storage of rainwater for reuse, groundwater recharge, or reduced dependence on external water sources.





Renewable Energy	Energy derived from naturally replenished sources such as solar, wind, hydro, or biomass.
Responsible AI	The development and use of artificial intelligence in ways that are ethical, transparent, secure, fair, accountable, and aligned with human and business values.
Responsible Business Conduct	Business practices guided by integrity, compliance, transparency, fairness, accountability, respect for human rights, and stakeholder trust.
Responsible Data Processing	The collection, storage, use, transfer, and deletion of data in a lawful, secure, transparent, and purpose-limited manner.
Responsible Innovation	Innovation that considers ethical, social, environmental, privacy, security, and governance implications throughout the product or technology lifecycle.
Risk Management	The process of identifying, assessing, mitigating, monitoring, and reporting risks that could affect the organization's objectives or stakeholders.
SASB – Sustainability Accounting Standards Board	A sustainability disclosure framework focused on financially material ESG topics by industry.
Scope 1 Emissions	Direct greenhouse gas emissions from sources owned or controlled by the organization, such as fuel used in company facilities or vehicles.
Scope 2 Emissions	Indirect greenhouse gas emissions from purchased electricity, heating, cooling, or steam consumed by the organization.
Scope 3 Emissions	Other indirect greenhouse gas emissions across the value chain, such as business travel, employee commuting, supplier activities, and purchased goods or services.
SDGs – Sustainable Development Goals	The 17 global goals adopted by the United Nations to address social, economic, and environmental challenges, including education, health, equality, climate action, and partnerships.
Secure Product Development	The practice of embedding security controls, privacy safeguards, testing, governance, and risk management into the product development lifecycle.
SME Climate Hub	A global initiative that supports small and medium-sized enterprises in making climate commitments and progressing towards emissions reduction and net zero.
SNEHA – Sustainable Nurturing through Education and Health Activities	SunTec's CSR and community engagement platform focused on education, healthcare, community welfare, environmental stewardship, social inclusion, and employee volunteering.
SOC 2 Type II	An independent assurance report that evaluates the effectiveness of controls related to security, availability, confidentiality, processing integrity, and privacy over a defined period.





Speak-Up Culture	A workplace culture that encourages employees and stakeholders to raise concerns about misconduct, unethical behaviour, policy violations, or risks without fear of retaliation.
Stakeholder Engagement	The process of engaging with employees, customers, suppliers, partners, communities, leadership, and other stakeholders to understand expectations and improve decision-making.
STP – Sewage Treatment Plant	Infrastructure used to treat wastewater so it can be safely reused or discharged in accordance with applicable standards.
SunQMS	SunTec’s quality management system platform or framework used to support policy governance, documentation, compliance, and process discipline.
Supplier Code of Conduct	A formal document that sets expectations for suppliers on ethics, compliance, human rights, labour standards, environmental responsibility, information security, and responsible business practices.
Supplier ESG Assessment	The evaluation of suppliers against environmental, social, governance, ethical, compliance, labour, and sustainability criteria.
Sustainable Infrastructure	Physical infrastructure designed, built, and operated to minimize environmental impact and improve efficiency, accessibility, resilience, and occupant wellbeing.
Sustainable Procurement	Procurement practices that integrate ESG considerations into supplier selection, onboarding, evaluation, contracting, and relationship management.
Sustainable Supply Chain	A supply chain that integrates ethical, environmental, social, human rights, compliance, and governance considerations into sourcing and supplier management.
tCO₂e – Tonnes of Carbon Dioxide Equivalent	A standard unit used to express greenhouse gas emissions in terms of the equivalent amount of carbon dioxide.
Third-Party Risk Management	The process of identifying, assessing, monitoring, and mitigating risks associated with vendors, suppliers, contractors, service providers, and business partners.
TRUE Zero Waste Certification	A certification administered by GBCI that recognizes facilities pursuing zero-waste goals through waste reduction, reuse, recycling, and diversion from landfill.
UNGC – United Nations Global Compact	A global corporate sustainability initiative based on principles covering human rights, labour, environment, and anti-corruption.
UN Women’s Empowerment Principles / WEPs	A set of principles that guide businesses in promoting gender equality and women’s empowerment in the workplace, marketplace, and community.





Waste Diversion	The process of redirecting waste away from landfill through reuse, recycling, composting, recovery, or responsible disposal methods.
Wastewater Reuse	The treatment and reuse of wastewater for non-potable purposes such as landscaping, flushing, or other operational uses.
Water Stewardship	Responsible management of water consumption, wastewater, rainwater harvesting, recycling, reuse, and water-related risks.
Whistleblower Mechanism	A formal channel that enables employees and stakeholders to report unethical conduct, policy violations, fraud, harassment, or other concerns.
Xelerate	SunTec’s flagship platform for pricing, billing, revenue management, partner ecosystem management, and related business processes.

