Business Responsibility & Sustainability Reporting



SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

| 1. | Corporate Identity Number (CIN) of the Listed Entity | L74899HR1995PLC132187 |
|-----|---|--|
| 2. | Name of the Listed Entity | Bharti Hexacom Limited ('Bharti Hexacom' or |
| ۷. | Name of the Listed Littly | 'Hexacom' or 'Company') |
| 3. | Year of incorporation | 1995 |
| 4. | Registered office address | Airtel Center, Plot No. 16, Udyog Vihar, Phase-IV, Guruqram - 122015, India |
| 5. | Corporate address | Bharti Crescent, 1, Nelson Mandela Road, Vasant Kunj, Phase II, New Delhi - 110070, India |
| 6. | E-mail | bhartihexacom@bharti.in |
| 7. | Telephone | +91-0124-4222222, +91-011-4666 6100 |
| 8. | Website | www.bhartihexacom.in |
| 9. | Financial year for which reporting is being done | FY 2024-25 |
| 10. | Name of the Stock Exchange(s) where shares are listed | BSE Limited (BSE), National Stock Exchange of India Limited (NSE) |
| 11. | Paid-up Capital | ₹2,500 million |
| 12. | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR Report | Amit Chaturvedi, Company Secretary and Compliance Officer Telephone Number: +91-11-4666 6100 Email ID: bhartihexacom@bharti.in |
| 13. | Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e., only for the entity) or on a consolidated basis (i.e., for the entity and all the entities which form a part of its consolidated financial statements, taken together) | Standalone basis - Bharti Hexacom Limited, unless otherwise specified |
| 14. | Name of assurance provider | DNV Business Assurance India Private Limited |
| 15. | Type of assurance obtained | Reasonable Assurance (for BRSR core indicators) and Limited Assurance (for other indicators) |

II. Products/services

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

| Sr. No. | Description of Main Activity | Description of Business Activity | % of Turnover of the Entity |
|------------|-------------------------------|---|-----------------------------|
| 1. | Information and Communication | Wired, wireless or satellite telecommunication activities | 100 |

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

| Sr. No. | Product/Service | NIC Code | % of total Turnover Contributed |
|------------|--|----------|------------------------------------|
| 1. | Wireless Telecommunication Activities | 612 | 97.05 |
| | Activities of Internet access by the operator of the wireless infrastructure (61201) | | |
| | Activities of maintaining and operating cellular and other telecommunication networks (61202) | | |
| | Activities of other wireless telecommunications activities (61209) | | |
| 2. | Wired Telecommunication Activities | 611 | 2.95 |
| | Activities of basic telecom services: telephone, telex and telegraph (includes the activities of STD/ISD booths) (61101) | | |
| | Activities of providing internet access by the operator of the wired infrastructure (61104) | | |

III. Operations

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

| Location Number of plants* | | Number of offices | Total | | |
|----------------------------|----------------|-------------------|----------------|--|--|
| National | Not applicable | 12 | 12 | | |
| International** | Not applicable | Not applicable | Not applicable | | |

^{*} Mobile towers are not included.

19. Markets served by the entity:

a. Number of locations

| Locations | Number |
|--------------------------------|----------------|
| National (No. of States) | 7 |
| International (No. of States)* | Not applicable |

^{*} Bharti Hexacom has no international operations.

- b. What is the contribution of exports as a percentage of total turnover of the entity? 0.15%
- c. A brief on types of customers End consumers (B2C)

IV. Employees

20. Details as at the end of financial year i.e. as on March 31, 2025

a. Employees and workers (including differently abled):

| Sr. | Bestieulese | T-4-1/A) | Mal | е | Female | | |
|-----|--------------------------|-------------|---------|-----------|---------|-----------|--|
| No. | Particulars | Total (A) — | No. (B) | % (B / A) | No. (C) | % (C / A) | |
| Emp | loyees | | | | | | |
| 1. | Permanent (D) | 569 | 501 | 88 | 68 | 12 | |
| 2. | Other than Permanent (E) | - | - | - | - | - | |
| 3. | Total employees (D + E) | 569 | 501 | 88 | 68 | 12 | |
| Wor | kers | | | | | | |
| 4. | Permanent (F) | - | - | - | - | - | |
| 5. | Other than Permanent (G) | 2,068 | 2,036 | 98 | 32 | 2 | |
| 6. | Total workers (F + G) | 2,068 | 2,036 | 98 | 32 | 2 | |

b. Differently abled Employees and workers:

| Sr. | Particulars | Total (A) — | Mal | е | Female | | |
|------|---------------------------------------|-------------|---------|-----------|---------|-----------|--|
| No. | raiticulais | iotai (A) — | No. (B) | % (B / A) | No. (C) | % (C / A) | |
| Diff | erently abled employees | | | | | | |
| 1. | Permanent (D) | | A.171 | | | | |
| 2. | Total differently abled employees (D) | | Nil | | | | |
| Diff | erently abled workers | | | | | | |
| 3. | Other than permanent (G) | | | Nil | | | |
| 4. | Total differently abled workers (G) | | | | | | |

21. Participation/inclusion/representation of women:

| | Total (A) | No. and percentage of Females | | | | |
|--------------------------|-------------|-------------------------------|---------|--|--|--|
| | Total (A) — | No. (B) | % (B/A) | | | |
| Board of Directors | 10 | 1 | 10 | | | |
| Key Management Personnel | 3 | 0 | 0 | | | |

22. Turnover rate for permanent employees and workers (Disclose trends for the past 3 years):

| | FY 2024-25 (In %) | | | FY 2 | 023-24 (In 9 | %) | FY 2022-23 (In %) | | | |
|---------------------|-------------------|--------|-------|------|--------------|------------|-------------------|--------|-------|--|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total | |
| Permanent Employees | 18.8 | 28.6 | 19.9 | 19.6 | 18.2 | 19.3 | 25.1 | 35.5 | 26.1 | |

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

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

| Name of the holding/subsidiary/ associate companies/joint ventures (A) | Indicate whether holding/ subsidiary/Associate/ Joint Venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|--|---|--------------------------------------|---|
| Bharti Airtel Limited* | Holding company | 70 | Yes |

^{*}Bharti Airtel Limited ('Bharti Airtel' or 'Airtel') is the holding company of Bharti Hexacom Limited.

VI. CSR details

24. (i) Whether CSR is applicable as per Section 135 of Companies Act, 2013: Yes

(ii) Turnover: ₹85,479 million

(iii) Net worth: ₹58,448 million

VII. Transparency and Disclosures Compliances

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

| Chalabalda. | Grievance Redressal | | FY 2024-25 | | FY 2023-24 | | | | | | | | |
|---|---|--|------------|---------|---|--|---------|--|--|--|--|--|--|
| Stakeholder group from whom complaint is received | Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy) | Number of Number of complaints complaints pending filed during resolution at the year close of the year Rema | | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | | | | | | |
| Communities & NGOs | Yes, Communities & NGOs Grievance Redressal Policy | 0 | 0 | - | 0 | 0 | - | | | | | | |
| Shareholders/ Investors | Yes, <u>Investors and</u> <u>Shareholders</u> | 7 | 0 | - | 0 | 0 | - | | | | | | |
| Employees and workers | Yes | 2 | 0 | - | 1 | 0 | - | | | | | | |
| Customers | Yes, <u>Telecom</u> <u>Customer Charter</u> | | | | | | | | | | | | |
| Value chain partner – suppliers | Yes, Airtel Partner World | 0 | 0 | - | 0 | 0 | - | | | | | | |
| Others (Channel partners) | Yes, <u>Anmol Ratna</u> <u>Portal</u> | 10 | 0 | - | 11 | 0 | - | | | | | | |

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

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

For relevant details, please refer 'SCOT Analysis' on page 52 and 'Risk and Opportunities' on page 54 of this Annual Report.

^{**} Bharti Hexacom has no international operations.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

| Dis | sclosure Questions | P1 | P2 | Р3 | P4 | P5 | P6 | P7 | Р8 | P9 |
|-----|--|-------------------------|---------------------|----|-------|---------|-------|----|----|----|
| 1. | Policy and management processes | | | | | | | | | |
| | a. Whether your entity's policy/ policies cover each principle and its core elements of the NGRBCs. (Yes/No) | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ |
| | b. Has the policy been approved by the Board? (Yes/No)* | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ |
| | c. Web link of the Policies, if available | ble Refer Table 1 below | | | | | | | | |
| 2. | Whether the entity has translated the policy into procedures. (Yes /No) | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ |
| 3. | Do the enlisted policies extend to your value chain partners? (Yes/ No) | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ |
| 4. | Name the national and international codes/certifications/ labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | | Refer Table 2 below | | | | | | | |
| 5. | Specific commitments, goals and targets set by the entity with defined timelines, if any | | Refer Table 3 below | | | | | | | |
| 6. | Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met. | | | | Refer | Table 3 | below | | | |

Governance, leadership, and oversight

| 7. | Statement by director responsible for the business responsibility report, | Refer 'Chairma |
|----|--|----------------|
| | highlighting ESG-related challenges, targets, and achievements | page 10. |
| | (listed entity has flexibility regarding the placement of this disclosure) | |

Refer 'Chairman message' section of the Annual Report on page 10.

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

The Board holds the highest position within Bharti Hexacom's Governance Framework, providing ultimate oversight on all Environmental, Social, and Governance (ESG) matters and related initiatives.

 Does the entity have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes/No). If yes, provide details. ESG regime of Bharti Hexacom operates under group-wide regime of Bharti Airtel (holding company).

10. Details of Review of NGRBCs by the Company:

| Subject for Review | | | irecto | r/Co | mmitt | w was ee of t mmitt | the Bo | | | F | reque | | | • | ilf year | • | uarter | ly/ |
|---|-------|--------|----------|---------|--------|---------------------------|---------|--------|------|----|-------|----|----|--------|----------|----|--------|-----|
| | P1 | P2 | Р3 | P4 | P5 | P6 | P7 | Р8 | Р9 | P1 | P2 | Р3 | P4 | P5 | P6 | P7 | Р8 | PS |
| Performance against above policies and follow up action | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ | | | | A | Annua | lly | | | |
| Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances | Y | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ | | | | C |)uarte | erly | | | |
| Has the entity carried out indep | ende | nt ass | essm | ent/ e | valua | tion o | f the v | vorkin | g of | P1 | P 2 | Р3 | P4 | P5 | P6 | P7 | P8 | P9 |
| its policies by an external agence | y? (Y | es/No |). If ye | es, pro | vide r | name | of the | agen | Cy** | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ | Υ |

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

| Questions | P 1 | P 2 | Р3 | P4 | P5 | P6 | P7 | P8 | Р9 |
|---|-----|-----|----|-----|--------|-------|----|----|----|
| The entity does not consider the principles material to its business (Yes/No | | | | | | | | | |
| The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No) | | | | | | | | | |
| The entity does not have the financial or/human and technical resources available for the task (Yes/No) | | | | Not | applio | cable | | | |
| It is planned to be done in the next financial year (Yes/No) | | | | | | | | | |
| Any other reason (please specify) | | | | | | | | | |

^{*} Bharti Hexacom operates under group-wide policies, procedures and practices of holding company i.e. Bharti Airtel Limited.

Table 1 - NGBRC principle wise policy mapping*:

| Principle | Principle description | Policy |
|-----------|---|---|
| P1 | Ethics, Transparency and Accountability: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable | Bharti Hexacom Code of Conduct Ombudsperson Policy and Process Code of Conduct for Business Associates Tax Policy |
| P2 | Product Lifecycle Sustainability: Businesses should provide goods and services in a manner that is sustainable and safe | Code of Conduct for Business Associates Environment, Health and Safety Policy |
| Р3 | Employee Well-being: Businesses should respect and promote the well-being of all employees, including those in their value chains | Human Rights Policy Ombudsperson Policy and Process Environment, Health and Safety Policy |
| P4 | Stakeholder Engagement: Businesses should respect the interests of and be responsive to all its stakeholders | Stakeholder Engagement Framework Ombudsperson Policy and Process |
| P5 | Promoting Human Rights: Businesses should respect and promote human rights | Human Rights Policy Code of Conduct for Business Associates Ombudsperson Policy and Process POSH Policy |
| Р6 | Protection of Environment: Businesses should respect and make efforts to protect and restore the environment | Code of Conduct for Business Associates Environment, Health and Safety Policy |
| P7 | Responsible Policy Advocacy: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent | Bharti Hexacom Code of Conduct |
| P8 | Support Inclusive Growth: Businesses should promote inclusive growth and equitable development | Bharti Hexacom Code of Conduct Corporate Social Responsibility Policy Stakeholder Engagement Framework |
| P9 | Providing Customer Value: Businesses should engage with and provide value to their consumers in a responsible manner | Bharti Hexacom Code of Conduct Environment, Health and Safety Policy Stakeholder Engagement Framework |

^{*}Bharti Hexacom operates under group-wide policies, procedures and practices of holding company i.e. Bharti Airtel Limited.

Table 2 - National and International standards*:

| Principle | Principle description | Name of the national and international codes/certifications/labels/standards |
|-----------|---|---|
| P1 | Ethics, Transparency and Accountability: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable | i. Reporting in reference to GRI standards and International Integrated Reporting Framework ii. Independent assurance of non-financial information as per ISAE 3000 Assurance Standard iii. Signatory to United Nations Global Compact |
| P2 | Product Lifecycle Sustainability: Businesses should provide goods and services in a manner that is sustainable and safe | i. Science Based Targets initiative (SBTi) ii. Compliance with EMF radiation levels set by local regulations in line with ICNIRP (International Commission on Non-Ionising Radiation Protection) iii. ISO 14001: 2015 Environment Management System (EMS) |
| Р3 | Employee Well-being: Businesses should respect and promote the well-being of all employees, including those in their value chains | i. Signatory to United Nations Global Compact ii. ISO 45001: 2018 Occupational Health and Safety Managemen System (OHS MS) |
| P4 | Stakeholder Engagement: Businesses should respect the interests of and be responsive to all its stakeholders | i. Materiality assessment and stakeholder engagement in reference to GRI Standards and AccountAbility AA1000 principles |
| P5 | Promoting Human Rights: Businesses should respect and promote human rights | i. Signatory to United Nations Global Compact |
| P6 | Protection of Environment: Businesses should respect and make efforts to protect and restore the environment | i. Science Based Targets initiative (SBTi) ii. Compliance with EMF radiation levels set by local regulations in line with ICNIRP (International Commission on Non-Ionising Radiation Protection) iii. ISO 14001: 2015 Environment Management System (EMS) |
| P7 | Responsible Policy Advocacy: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent | i. Signatory to United Nations Global Compact ii. Board Membership (through holding company) of GSMA - Leading international telecom association |
| P8 | Support Inclusive Growth: Businesses should promote inclusive growth and equitable development | i. CSR disclosures pursuant to Section 135 of the Companies Act 2013 ii. Follow the guidance provided by ISO 26000 |
| P9 | Providing Customer Value: Businesses should engage with and provide value to their consumers in a responsible manner | i. ISO 27001: 2013 Information Security Management System (ISMS) ii. ISO 22301: 2019 Business Continuity Management System (BCMS) iii. TL9000: Quality Management System |

^{*}Bharti Hexacom operates under group-wide policies, procedures and practices of holding company i.e. Bharti Airtel Limited.

04

^{**} The Company has in place a robust Internal Assurance Group, led by the Chief Internal Auditor and ably supported by reputed independent firms as the Internal Assurance Partners, which serves as a mechanism for assessment/evaluation of the working of all its key policies.

Table 3 - Specific commitments, goals, and targets*:

| Specific commitments, goals and targets set by the entity | Performance | Mapped NGBRC Principle ¹ | Status |
|--|---|--|----------|
| Climate Change and Energy Management To reduce carbon emissions (Scope 1 and 2) by 50.2% by FY ending March 2031, using FY 2021-22 as baseline as per science-based targets initiative and GSMA pact | Reported 1,102,249 tCO ₂ e of carbon emissions (Scope 1 and 2) in FY 2024-25 | P2 and P6 | |
| To reduce absolute Scope 3 GHG emissions by 42% by FY ending 2031, using FY 2020-21 as baseline, per SBTi | Reported 6,698,692 tCO ₂ e of carbon emissions (Scope 3) in FY 2024-25 | P2 and P6 | |
| In line with target set by GSMA under Carbon Action Plan for telecom industry, achieve net zero carbon emissions by 2050 | We plan to get the long-term (net zero) targets validated by SBTi within 2 years | P2 and P6 | |
| Resource Efficiency Ensuring e-waste is sold to authorised recyclers/refurbishers to ensure environmentally sound waste management | E-waste is sold to authorised recyclers/refurbishers | P2 and P6 | |
| Sustaining ISO 14001 certification (for environment management system)** | Successfully completed surveillance audit | P6 | |
| Digital Inclusion The Company is committed to positively impact 150 million lives by 2025 by promoting digital inclusivity through extending high-speed 4G/5G data connectivity to data-starved regions and accelerating upgradation of feature phone users to smartphones, making device ownership affordable for low-income groups | Enabled 4G/5G network connections and covered an additional population of 158 million between January 2021 and March 2025 | P8 | ^ |
| Diversity, Inclusion, Equity and Belonging Ensuring at least 20% women employees by FY ending March 2025 | 18.5% women employees in workforce as on March 31, 2025 | P3 and P5 | _ |
| Employee Health and Well-being Sustaining ISO 45001 certification (for occupational health and safety management system)** | Successfully completed surveillance audit | P3 and P5 | |
| Community Stewardship*** To contribute 2% of the average net profit of the preceding three financial years, in CSR and social development activities each year | ₹74 Mn contributed to CSR and charitable activities in FY 2024-25 | P8 | |
| Enhancing Customer Experience and Satisfaction To reduce B2C customer interactions by 20% by FY ending March 2025, using FY ended March 2023 as baseline | >17% reduction in overall B2C customer interactions from FY 2022-23 | P9 | |
| Maintain compliance with EMF radiation levels set by local regulations in line with ICNIRP Standards (International Commission on Non-Ionising Radiation Protection)** | No non-compliances were observed for all the base stations audited by DoT in FY 2024-25 | P9 | |
| Data Protection and Cybersecurity Maintain zero data breaches | Zero cases for data breaches in FY 2024-25 | P9 | |
| Human Capital Development To increase average training hours per employee by 15% | 29 training hours per employee, against a target of 17 hours per employee | P3 | |
| Sustainable Supply Chain Management Implement an ESG engagement programme with 75% of suppliers (based on expenditure value) by 2025 | Implemented ESG engagement programmes with 75% of suppliers | P2 and P8 | _ |
| Corporate Governance Periodically conduct materiality assessment through formal stakeholder engagement to prioritise ESG focus areas | Revisited materiality assessment to ensure continued applicability | P1 and P4 | |

^{*}Bharti Hexacom operates under group wide targets of holding company i.e. Bharti Airtel Limited.

06



SECTION C: PRINCIPLE-WISE PERFORMANCE DISCLOSURE

PRINCIPLE 1:

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

ESSENTIAL INDICATORS

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

| Segment | Total number of training and awareness programmes held | Topics/principles covered under the training and its impact | % of persons in respective category covered by the awareness programmes* |
|--|---|--|--|
| Board of Directors | Defer to the Deno | rt on Cornerate Covernance forming next of this Annual Bon | port on page 114 |
| Key Managerial Personnel (KMP) | — Reier to trie Repor | rt on Corporate Governance forming part of this Annual Rep | oort on <u>page 114</u> . |
| Employees other than Board of Directors or KMPs | 12 | Code of Conduct, Prevention of Sexual Harassment, ESG aspects, Safety (Road Safety, Women Safety, Electrical Safety, etc.), information security, business continuity including privacy awareness. Additionally, all the employees go through the above-mentioned training sessions at the time Joining and annually thereafter. | 100 |
| Workers | 5 | Code of Conduct, safety (road safety, women safety, electrical safety, etc.), Prevention of Sexual Harassment, Conflict of Interest, insurance benefits, Airtel Suraksha. | 100 |

^{*} Percentage indicates details of trainings extended.

- 2. Details of fines/penalties/punishment/award/compounding fees/settlement amount paid in proceedings (by the entity or by directors/KMPs) with regulators/law enforcement agencies/judicial institutions, in the financial year, in the following format (Note: The entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website): None.
- 3. Of the instances disclosed in Question 2 above, details of the Appeal/Revision preferred in cases where monetary or non-monetary action has been appealed: Not applicable.
- 4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy: The Company has a zero-tolerance approach towards bribery and corruption and is committed towards acting transparently, ethically and with integrity in all its business dealings and relationships wherever the Company operates. Further, the Company has in place a robust group-wide Anti-Bribery and Anti-Corruption Policy (ABAC). This policy extends to all employees of the Company and its holding company and is subject to all local legal/regulatory requirements and amendments from time to time. Brief details of the ABAC Policy form part of the Code of Conduct of the Company which is available on the website (click here).
- 5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/corruption: Nil.
- **6. Details of complaints with regard to conflict-of-interest:** No complaints were received with regard to conflict of interest of the directors and KMPs.
- 7. Provide details of any corrective action taken or under way on issues related to fines/penalties/ action taken by regulators/law enforcement agencies/judicial institutions, on cases of corruption and conflicts of interest: Not applicable.

^{**} The scope of targets and performance is limited to Bharti Airtel Limited and Bharti Hexacom Limited.

 $^{{}^{***}\}textit{The scope of targets and performance is limited to Bharti Hexacom Limited}.$

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

| | FY 2024-25 | FY 2023-24 |
|-------------------------------------|------------|------------|
| Number of days of accounts payables | 63 | 74 |

9. Open-ness of business

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

| Parameters | Met | crics | FY 2024-25 | FY 2023-24 |
|---|-----|--|----------------|----------------|
| Concentration of Purchases | a. | Purchases from trading houses as % of total purchases | Not applicable | Not applicable |
| | b. | Number of trading houses where purchases are made from | Not applicable | Not applicable |
| | | Purchases from top 10 trading houses as % of total purchases from trading houses | Not applicable | Not applicable |
| Concentration of Sales | a. | Sales to dealers/ distributors as % of total sales | 75.48 | 63.16 |
| | b. | Number of dealers/ distributors to whom sales are made | 1,031 | 977 |
| | | Sales to top 10 dealers/ distributors as % of total sales to dealers/ distributors | 72.45 | 72.42 |
| Share of Related Party Transactions ('RPTs') | a. | Purchases (Purchases with related parties/ Total Purchases*) | 60 | 54 |
| | b. | Sales (Sales to related parties/ Total Sales**) | 11 | 10 |
| | | Loans & advances (Loans & advances given to related parties/ Total loans & advances) | 0 | 0 |
| | d. | Investments (Investments in related parties/ Total Investments made) | 0 | 0 |

^{*} Total operational expenditure.

LEADERSHIP INDICATORS

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

| Total number of awareness programmes held | Topics / principles covered under the training | % Age of value chain partners covered (by value of business done with such partners) under the awareness programmes |
|---|--|---|
| 13 | ESG awareness and expectations, NGRBC Principles, Group ESG policies (Code of Conduct, Human Rights, Safety), key focus areas (emissions, safety, packaging, etc.), value chain reporting requirements, and handholding/capacity-building sessions | 03.83 |

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

Yes, Bharti Hexacom Limited has robust policies and processes in place, including the Code of Conduct and Policy on Related Party Transactions ('RPT Policy') to prevent any conflicts of interest involving directors and/or Key Managerial Personnel ('KMP'). Confirmation with regard to adherence to the Code of Conduct is obtained from all the directors and KMPs at the time of joining and thereafter, on an annual basis. In terms of the RPT Policy, a related party transaction in which any of the directors or the KMPs is concerned or interested requires prior approval of the Board in addition to the prior Audit Committee approval for all related party transactions. The concerned/interested Director recuses himself/ herself and abstain from discussion and voting on such proposal for approval of the said transaction at the meeting of Audit Committee and Board, as applicable.

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

ESSENTIAL INDICATORS

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

| | FY 2024-25 | FY 2023-24 | Details of improvements in environmental and social impacts |
|-------|------------|------------|--|
| Capex | 1.44 | 1.20 | To improve energy efficiency and reduce environmental impact, The company has implemented the following initiatives: |
| | | | Transitioned from bridge-based calls to link-based calls, significantly lowering emissions |
| | | | Installed battery banks and solar panels to reduce diesel dependency and further cut the carbon footprint |

- 2. a. Does the entity have procedures in place for sustainable sourcing? Yes
 - b. If yes, what percentage of inputs were sourced sustainably? 92.17%
- 3. Describe the processes in place to safely reclaim your products for reusing, recycling, and disposing at the end of life, for: (a) Plastics (including packaging), (b) E-waste, (c) Hazardous waste, and (d) other waste: Bharti Hexacom is committed to reusing, reducing, and recycling waste to promote a circular economy and ensure efficient resource utilisation. Company's processes include multiple evaluations to assess the potential of products for repair or refurbishment for reuse. The Company further ensures the sustainable recycling of waste, including e-waste, battery waste, and plastic waste, through government-authorised recyclers. In addition, the company, in accordance with Extended Producer Responsibility (EPR) guidelines collaborates with service providers to responsibly collect electronic products and plastic packaging for sustainable recycling.
- 4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same:

Yes, Extended Producer Responsibility (EPR) is applicable to Hexacom under the plastic waste category. The Company collaborates with service providers to ensure execution of waste collection plan in line with collection target issued to them by Central Pollution Control Board (CPCB).

^{**} Total revenue from operations.

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

ESSENTIAL INDICATORS

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

| | | | | | % o | f employe | es covered | d by | | | |
|---------------------|-----------|---------|---------------|---------|--------------|-----------|-----------------|---------|----------------|---------------------|---------|
| Category | Total (A) | | alth rance | | dent ance | | ernity efits | | rnity efits | Day care facilities | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (D) | % (D/A) | No. (E) | % (E/A) | No. (F) | % (F/A) |
| Permanent employees | | | | | | | | | | | |
| Male | 501 | 501 | 100 | 501 | 100 | - | - | 501 | 100 | 501 | 100 |
| Female | 68 | 68 | 100 | 68 | 100 | 68 | 100 | - | - | 68 | 100 |
| Total | 569 | 569 | 100 | 569 | 100 | 68 | 100 | 501 | 100 | 569 | 100 |

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

| | | | % of workers covered by | | | | | | | | | |
|-----------------|----------------|-----------|-------------------------|---------------|---------|---------------|---------|-----------------|---------|----------------|----------|------------|
| Category Tota | Category | Total (A) | | alth rance | | dent rance | | ernity efits | | rnity efits | Day care | facilities |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (D) | % (D/A) | No. (E) | % (E/A) | No. (F) | % (F/A) | |
| Other than Pern | nanent workers | | | | | | | | | | | |
| Male | 2,036 | 2,036 | 100 | 2,036 | 100 | - | - | 2,036 | 100 | | | |
| Female | 32 | 32 | 100 | 32 | 100 | 32 | 100 | - | - | | - | |
| Total | 2,068 | 2,068 | 100 | 2,068 | 100 | 32 | 100 | 2,036 | 100 | - | | |

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

| | FY 2024-25 | FY 2023-24 |
|---|------------|------------|
| Cost incurred on well-being measures as a % of total revenue of the Company | 0.05 | 0.05 |

^{*}The cost of well-being includes staff welfare expenses, salaries paid during maternity and paternity leave, and insurance benefits provided to employees.

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

| | | FY 2024-25 | | FY 2023-24 | | | |
|-------------------------|--|--|--|--|---|--|--|
| Benefits* | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/NA) | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/NA) | |
| PF | 100 | 100 | Y | 100 | 100 | Υ | |
| Gratuity | 100 | 100 | As and when applicable | 100 | 100 | As and when applicable | |
| ESI | 0.35 | 59 | Y | 0.23 | 59 | Υ | |
| Others – please specify | | | N | A | | | |

^{*}All statutory dues were provided to employees and workers as per applicable legislations.

3. Accessibility of workplaces

Are the premises/offices of the entity accessible to differently abled employees, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard: The Company has made all endeavours to meet the requirements of PWD Act. The Company has wheelchairs, dedicated car parking, elevators etc. for the convenience of disabled person(s).

- 4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy: Yes, the policy is available via company's intranet.
- 5. Return to work and Retention rates of permanent employees that took parental leave.

| Gender | Permanent | Employees |
|--------|---------------------|----------------|
| Gender | Return to work rate | Retention rate |
| Male | 100% | 100% |
| Female | 100% | 0% |
| Total | 100% | 91% |

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

| | Yes/No (If yes, then give details of the mechanism in brief) |
|------------------------------|---|
| Permanent Employees | Yes, the Company has 'Employee Resolution Query Management System', administered by human resource function, which addresses issues such as service conditions, organisational policies, performance evaluations and various operational matters. |
| | In addition to the above, the Company has a 'Code of Conduct' covering 'Whistle Blower Policy' that allows employees including contractual workers, to report concerns with reference to the |
| Other than Permanent Workers | Code of Conduct without any fear of retaliation. The Ombudsperson administers the whistle blower/vigil mechanism which allows employees to report any threatened or actual breach of the 'Code of Conduct'. |

- 7. Membership of employees and worker in association(s) or Unions recognised by the listed entity: Nil, as the Company does not have any employee association or union.
- 8. Details of training given to employees and workers:

| | | FY 2024-25* | | | | | FY 2023-24* | | | | |
|-----------|-----------|-------------------------------|---------|-------------------------|---------|-----------|-------------------------------|---------|-------------------------|---------|--|
| Category | Total (A) | On Health and safety measures | | On Skill upgradation | | Total (D) | On Health and safety measures | | On Skill upgradation | | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) | |
| Employees | | | | | | | | | | | |
| Male | 501 | 501 | 100 | 501 | 100 | 370 | 370 | 100 | 370 | 100 | |
| Female | 68 | 68 | 100 | 68 | 100 | 54 | 54 | 100 | 54 | 100 | |
| Total | 569 | 569 | 100 | 569 | 100 | 424 | 424 | 100 | 424 | 100 | |
| Workers | | | | | | | | | | | |
| Male | 2,036 | 2,036 | 100 | 2,036 | 100 | 1,097 | 1,097 | 100 | 1,097 | 100 | |
| Female | 32 | 32 | 100 | 32 | 100 | 13 | 13 | 100 | 13 | 100 | |
| Total | 2,068 | 2,068 | 100 | 2,068 | 100 | 1,110 | 1,110 | 100 | 1,110 | 100 | |

^{*} Percentage indicates details of trainings extended.

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

| Category | F | Y 2024-25 | | F | Y 2023-24 | |
|-----------|-----------|-----------|---------|-----------|-----------|---------|
| | Total (A) | No (B) | % (B/A) | Total (C) | No (D) | % (D/C) |
| Employees | | | | | | |
| Male | 501 | 501 | 100 | 370 | 370 | 100 |
| Female | 68 | 68 | 100 | 54 | 54 | 100 |
| Total | 569 | 569 | 100 | 424 | 424 | 100 |
| Workers | | | | | | |
| Male | 2,036 | 803 | 39 | 1,097 | 364 | 33 |
| Female | 32 | 5 | 16 | 13 | 0 | 0 |
| Total | 2,068 | 808 | 39 | 1,110 | 364 | 33 |

^{* 100%} of eligible employees have undergone performance and career development reviews.

10. Health and safety management system:

a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/No). If yes, the coverage of such system? Yes, the company has a comprehensive Occupational Health and Safety Management System (OHS MS) and is ISO 45001 certified. The Company has a safety charter called 'Airtel Suraksha Programme' and various policies/manuals like group level 'Bharti Airtel Workplace Safety Policy', 'Infrastructure and Safety Policy', 'Supplier Safety Policy', 'Women Safety Policy' and Environment, Health and Safety Policy (EHS) Policy are in place to ensure safety at workplace. In addition, launched a safety incident reporting app 'AirtelShield'. The Company implemented a robust awareness campaign on OHS MS and its initiatives through training sessions, newsletters and workshops. Health & safety committees are established at both central and circle levels to ensure strict implementation of such policies.

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

The company recognises and accords highest priority to safety and well-being of its employees and other stakeholders. To identify work-related hazards, the Company has implemented a robust Hazard Identification and Risk Assessment System (HIRA) to undertake safety audits and identify work related hazards in its operations.

Health and safety audit:

- i. Conducting annual review of Occupational Health and Safety Management System.
- i. Stakeholder consultation to understand and evaluate current operating procedures and identifying any gaps in the system.
- iii. Control-focused recommendations to define management action plans, including responsibilities and timelines for implementation.

Health and safety performance review:

- . Monthly review of health and safety performance by management on pre-defined KPIs.
- i. Review of reported incidents, audit findings, progress on Health, Safety and Environment (HSE) goals, and changes to service line and operations.
- iii. Based on the above review, improvement areas are identified followed by strengthening of internal controls for health and safety risk management.

Incident investigation and risk analysis:

- i. All reported incidents are investigated from the policy compliance and risk assessment point of view.
- ii. Deep root cause analysis of incidents and ensuring corrective and preventive actions.
- iii. Proactive reporting of unsafe acts and conditions when observed by employees and associates.

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

Yes, the company has implemented procedures that allow its workers to report work-related hazards and be cautious of potential risks. Workers can utilise the following channels to report any work-related hazards:

- i. Toll-free number on ID card to report risks/hazards.
- i. Central generic Email ID to report risks/hazards.
- iii. Local Email ID to report risks/hazards.
- iv. Incident reporting app: AirtelShield (to report safety incidents and violation of Safety Policy).
- d. Do the employees/workers of the entity have access to non-occupational medical and healthcare services? (Yes/No) Yes, the company provides access to non-occupational medical and healthcare services to its employees and workers.

11. Details of safety-related incidents:

| Safety Incident/Number | Category | FY 2024-25 | FY 2023-24* |
|--|-----------|------------|-------------|
| Lost Time Injury Frequency Rate (LTIFR) (per | Employees | 0 | - |
| one million-person hours worked) | Workers | 0.73 | - |
| Total recordable work-related injuries | Employees | 0 | - |
| | Workers | 4 | - |
| No. of fatalities (safety incident) | Employees | 0 | - |
| | Workers | 1 | - |
| High consequence work-related injury or ill- | Employees | 0 | - |
| health (excluding fatalities) | Workers | 0 | - |

^{*} The company did not report safety incidents in FY 2023-24.

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

At Hexacom, ensuring a safe and healthy workplace is top priority. The Company has adopted a comprehensive and proactive approach to occupational health and safety through the Airtel Suraksha Programme. The key initiatives and measures undertaken or proposed include:

Strategic Measures and Initiatives

- i. **Launch of AirtelShield App:** A new safety incident reporting app, AirtelShield, was launched in December 2024 to streamline reporting and resolution of safety incidents.
- ii. **Airtel Suraksha Safety Awards:** Instituted on a monthly and quarterly basis to recognise and encourage best safety practices across teams.
- iii. **Strict Disciplinary Action:** Disciplinary actions including issuance of warning letters and termination action against violators with regard to safety violations during the year.
- iv. **Targeted Awareness Campaigns:** A focused safety governance drive was launched for the D2C and MR cohorts in the last quarter to increase awareness and compliance.
- v. **Engaging Safety Events:** Regular safety awareness activities and competitions are conducted for employees, associates, and their families.
- vi. **Safety Communication:** Positive safety stories under the banners #Airtellnspire and #SafetyHeroes are featured in the monthly Airtel Suraksha Newsletter.
- vii. **Internal Communication Integration:** A dedicated Airtel Suraksha section has been created in the Connected Airtel monthly newsletter to reinforce the importance of workplace safety.
- viii. **Mandatory Training:** Workplace Safety Policy training is now a compulsory part of the annual Code of Conduct (COC) training module.
- ix. **Strengthening Safety Teams:** Safety resources have been onboarded at all circles, and a robust Team #AirtelSuraksha is being built to drive safety culture on the ground.
- x. **Monthly Themed Activities:** Monthly safety-themed events and campaigns are organised to maintain engagement and awareness, along with the continued publication of the Airtel Suraksha Newsletter.

Institutionalised Safety Framework

- i. **Comprehensive Health & Safety Policy:** A detailed policy and operational manual guide safe practices, including health promotion and disease prevention.
- ii. **Safety Committees:** Safety Committees formed at Centre and Circles to drive safety policies, to enhance safety awareness, incident management and effective governance.
- iii. **Risk Assessments & Training:** Regular risk assessments and safety training sessions are conducted to identify and mitigate workplace hazards.
- iv. **Fire Safety & Security Protocols:** Fire evacuation drills are conducted quarterly, supported by standardised security systems across all business units.
- v. Incident Management: All safety incidents are promptly reported, investigated, and addressed to prevent recurrence.
- vi. **Induction & Refresher Training:** Safety induction and regular refresher programs are mandatory for employees, partners and associates.
- vii. **Employee Perception Surveys:** These are conducted periodically to evaluate employee satisfaction with safety practices and identify areas for improvement.
- viii. **Health & Wellness Initiatives:** On-site medical facilities, free diagnostics, gym access, and road safety awareness programs are part of Company's ongoing efforts to promote overall employee well-being.
- 13. Number of Complaints on the following made by employees and workers:

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

14. Assessments for the year:

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|---|
| Health and safety practices | 100 |
| Working Conditions | 100 |

- 15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions: The company has implemented the following measures to address safety-related risks and hazards:
 - New safety incident reporting app "AirtelShield" has been rolled out in December '24.
 - Airtel Suraksha Safety Awards being rolled out on monthly & quarterly basis.
 - Focussed approach on D2C and MR cohort in last quarter to increase safety awareness and governance.
 - Safety awareness activities & competitions for employees, associates and families being regularly held at circles.
 - Positive Safety stories #Airtel Inspire #Safety Heroes are being published in Airtel Suraksha Monthly Newsletter.
 - Dedicated Airtel-Suraksha corner in monthly Connected Airtel newsletter.
 - Training on Workplace Safety Policy made mandatory as part of annual Code of Conduct training module.
 - Safety resources hired at all circles, building of potent Team #AirtelSuraksha in progress.
 - Safety theme-based activities and events being organised each month including the Airtel Suraksha Monthly Newsletter being published.

LEADERSHIP INDICATORS

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

| | (Yes/No) |
|-----------|----------|
| Employees | Yes |
| Workers | Yes |

- 2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners: Bharti Hexacom has defined guidelines for value chain partners as part of its Code of Conduct for Business Associates to pay remuneration to their employees in compliance with the applicable laws and regulations which includes minimum wages, deduction from wages, overtime hours and associated applicable benefits. In addition, the company has below measures in place to ascertain compliance.
 - Established a framework to ensure regulatory compliance by suppliers falling under the Contract Labour Regulation and Abolition Act (CLRA) including, PF, ESIC, Professional tax etc.
 - Conducts self-assessment surveys for suppliers with significant procurement value to confirm their compliance with statutory requirements, including PF, ESIC, Professional tax etc.
- 3. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/No):

To support employees approaching retirement, the Company launched 'Limitless Horizons' - a dedicated three-month transition assistance programme - offering both virtual and in-person sessions led by subject matter experts. The programme covers purpose discovery, psychological and physical well-being, emotional resilience, financial security, and post-retirement planning. It concludes with a personalised closing ceremony to honour retirees, as well as expert sessions on managing financial risk and building sustainable post-retirement plans - ensuring a respectful and well-supported transition into the new chapter of life.

4. Details on assessment of value chain partners:

| | % of value chain partners (by value of business done with such partners) that were assessed | | | |
|-----------------------------|---|--|--|--|
| Health and safety practices | 95.86 | | | |
| Working Conditions | 95.86 | | | |

- 5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners. The company has instituted a Supplier Safety Policy that outlines health and safety compliance expectations for its value chain partners. Compliance is monitored by company's Safety and User functions, supplemented by annual self-assessment inputs. Any non-conformances are addressed through a defined Consequence Management Matrix The value chain safety framework has been enhanced through:
 - Incident reporting, monitoring and resolution via a centralised digital tool.
 - Regular health and safety audits and reviews, tracked through structured closure mechanisms.
 - Increased frequency of training and capacity-building sessions for Suppliers coupled with consequence management for non-compliance & safety governance reviews.

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

ESSENTIAL INDICATORS

16

1. Describe the processes for identifying key stakeholder groups of the entity: At group-level, stakeholder engagement and materiality assessment is conducted, guided by the leading AA1000 stakeholder engagement standards and ISO 26000:2010 to identify and prioritise key internal and external stakeholders. These stakeholders are directly or indirectly impacted by the business activities, products or services and associated performance, or on whom the Company is dependent in order to operate, or to whom the Company has, or in the future may have, legal, commercial, operational, on whom the Company is dependent in order to operate, or to whom the Company has, or in the future may have, legal, commercial, operational, or ethical/ moral responsibilities or who can influence or have impact on the Company's strategic or operational decision-making based.

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

| Stakeholder Group | Whether identified as Vulnerable & Marginalised Group (Yes/No) | SM Adv Me | annels of communication (Email, IS, Newspaper, Pamphlets, vertisement, Community etings, Notice Board, Website), thers | Frequency of engagement (Annually/Half Yearly/ Quarterly / Others – please specify) | key | rpose and scope of engagement including v topics and concerns raised during such gagement |
|----------------------|--|--|--|--|---|---|
| | | i. | Retail stores and contact centers across operational cities | ; | i | Seeking consumer feedback on our |
| Customers No | ii. | Email, SMS communication and Company website | On-going | ii. | services Delivering customer service and | |
| | | iii. | Social media engagement | | 11. | resolving customer queries |
| | | iv. | Thanks App | | | |
| | | i. | Annual General Meeting | | | |
| | | ii. | Electronic correspondence | | | |
| | | iii. | Press briefings | | i. | Answer to gueries of investors on |
| Investors/ | No | iv. | Analyst meets | Quarterly/ | | operations of the Company |
| Shareholders No | INO | V. | Earning calls | Annually/On going | ii. | Bring transparency with the community |
| | | vi. | Periodic emailers | | | of existing and potential investors |
| | | vii. | Shareholders' satisfaction survey | | | |
| | | i. | Company intranet portal | | | |
| | | ii. | Regular employee communication forums | On-going | i. ii. | Learning and development Employee recognition and engagement |
| Employees | No | iii. | Email | | iii. | activities |
| | | iv. | Annual employee surveys | | | Employee performance review and career development |
| | | V. | Amber (Employee engagement Tool) | | iv. | Employee safety and well-being |
| | | | | | i. | New Product /Technology development |
| | | | | | ii. | Material requirement planning |
| | | i. | Partner Portal | | iii. | Regulatory compliances including NSDTS |
| Suppliers | | ii. | Company Website | | iv. | Assessing supplier performance |
| and Network | No | iii. | Annual Confluence | On-going | V. | Commercial and Contract discussion |
| partners | | iv. | Meetings | | vi. | Supplier recognition and engagement |
| | | V. | Sustainability session | | | activities |
| | | | | | vii. | Engagement on Sustainability Parameters |
| Channel | | i. | E-mail, SMS communication | | i. | Resolving channel partner queries and operational challenges |
| partners | No | ;; | and Company website | On-going | ii. | Commission and reward scheme |
| | | ii. | Channel partner portal | | iii. | Sustained marketing support |

| Stakeholder Group | Whether identified as Vulnerable & Marginalised Group (Yes/No) | SM Adv Me | annels of communication (Email, S, Newspaper, Pamphlets, vertisement, Community etings, Notice Board, Website), ners | Frequency of engagement (Annually/Half Yearly/ Quarterly / Others – please specify) | key | rpose and scope of engagement including topics and concerns raised during such gagement |
|----------------------|--|-----------------|--|--|------|---|
| | | | | | i. | Deliberations and inputs on acts, rules, regulations, policies that have bearing on our operations and businesses |
| | | | | | ii. | TRAI consultations |
| Regulatory No | | i. | Electronic and physical | Need basis and on-going | iii. | DoT directives, orders, circulars, etc. |
| | No | | correspondence | | iv. | MIB consultations |
| | | ii. | Face to face meetings | | V. | TEC consultations |
| | | | | | vi. | Consultations by other ministries like MeitY, Ministry of Corporate Affairs, etc. That have bearing on our operations and businesses |
| | | i. | Advertisements | | i. | Supporting underserved students from |
| Communities* | Yes | ii. | Emails | On-going | | states across India with scholarship for pursuing higher education from top 50 |
| Communities | 163 | iii. | Meetings | Orrgonig | | NIRF institutes. Guiding them through |
| | | iv. | Website | | | process of scholarships through out |

^{*} Communities include students, educational institutes, NGO (Bharti Airtel Foundation) and other agencies supporting the initiative.

LEADERSHIP INDICATORS

- 1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board: Bharti Hexacom's Board holds the highest responsibility for all Environmental, Social, and Governance (ESG) matters, prioritising ESG and related initiatives. At group-level, materiality assessment is conducted every two to three years and the below mentioned key steps are followed:
 - i. During materiality exercise the key internal and external stakeholders are engaged to gather their concerns and views, which are incorporated into the materiality assessment process to prioritise ESG topics.
 - ii. Insights obtained from the stakeholder engagement are analysed to develop the materiality matrix, which helps finalise the list of ESG topics.
 - iii. The identified ESG topics are considered while defining the ESG targets and initiatives of the group.
- 2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes/No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity:

Yes, at a group-level, stakeholder engagement is conducted as a component of materiality assessment exercise, aiming to identify and prioritise environmental and social concerns. Based on the stakeholder feedback received, material issues are identified and prioritised basis impact on stakeholders and business. These material topics are linked with adopted ambitious targets and integrated in the strategy.

PRINCIPLE 5: Businesses should respect and promote human rights

ESSENTIAL INDICATORS

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

| | | FY 2024-25 | | FY 2023-24 | | | | |
|----------------------|-----------|---|----------|------------|--|----------|--|--|
| Category | Total (A) | No. of employees / workers covered (B) | % (B/A)* | Total (C) | No. of employees /workers covered (D) | % (D/C)* | | |
| Employees | | | | | | | | |
| Permanent | 569 | 569 | 100 | 424 | 424 | 100 | | |
| Total Employees | 569 | 569 | 100 | 424 | 424 | 100 | | |
| Workers | | | | | | | | |
| Other than permanent | 2,068 | 2,068 | 100 | 1,110 | 1,110 | 100 | | |
| Total Workers | 2,068 | 2,068 | 100 | 1,110 | 1,110 | 100 | | |

^{*} Percentage indicates details of trainings extended.

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

| | | ı | Y 2024-25 | | | FY 2023-24 | | | | |
|----------------------|-----------|----------|-----------|---------------------------|---------|------------|--------------------------|---------|---------------------------|---------|
| Category | Total (A) | Equal to | | More than Minimum Wage | | Total (D) | Equal to Minimum Wage | | More than Minimum Wage | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| Employees | | | | | | | | | | |
| Permanent | 569 | 0 | 0 | 569 | 100 | 424 | 0 | 0 | 424 | 100 |
| Male | 501 | 0 | 0 | 501 | 100 | 370 | 0 | 0 | 370 | 100 |
| Female | 68 | 0 | 0 | 68 | 100 | 54 | 0 | 0 | 54 | 100 |
| Workers | | | | | | | | | | |
| Other than Permanent | 2,068 | 652 | 32 | 1,416 | 68 | 1,110 | 320 | 29 | 790 | 71 |
| Male | 2,036 | 633 | 31 | 1,403 | 69 | 1,097 | 316 | 29 | 781 | 71 |
| Female | 32 | 19 | 59 | 13 | 41 | 13 | 4 | 31 | 9 | 69 |

3. Details of remuneration/salary/wages

a. Median remuneration/wages:

| | | Male | Female | | |
|---|--------|---|----------------|---|--|
| | Number | Median remuneration/ salary/wages of respective category in ₹ | Number | Median remuneration/ salary/wages of respective category in ₹ | |
| Board of Directors (BoD) | | | | | |
| Key Managerial Personnel (other than BoD) | | Refer to Annexure F of E | Board's Report | | |
| Employees other than BoD and KMP | 501 | 694,567 | 68 | 641,857 | |
| Workers | 2,036 | 19,799 | 32 | 15,503 | |

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

| | FY 2024-25 | FY 2023-24 |
|---|------------|------------|
| Gross wages paid to females as % of total wages | 11.01 | 11.64 |

^{*}Permanent employees have been considered.

- 4. Do you have a focal point (Individual / Committee) responsible for addressing human rights impact or issues caused or contributed to by the business? Yes.
- 5. Describe the internal mechanisms in place to redress grievances related to human rights issues:

The Company has an 'Employee Resolution Query Management System', administered by human resource function, that addresses issues related to human rights such as discrimination at workplace, child labour, forced labour/involuntary labour and other human rights related issues. In addition to the above, the Company has a 'Code of Conduct' covering 'Whistle Blower Policy' that allows employees including contractual workers, to report concerns with reference to 'Code of Conduct' relating to human rights violations, without any fear of retaliation. The ombudsperson administers the whistle blower/vigil mechanism which allows employees to report any threatened or actual breach of the 'Code of Conduct'.

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

| | | FY 2024-25 | | FY 2023-24 | | | |
|-----------------------------------|--------------------------|---|---------|--------------------------|---|---------|--|
| | Filed during the year | Pending resolution at the end of the year | Remarks | Filed during the year | Pending resolution at the end of the year | Remarks | |
| Sexual Harassment | 2 | 0 | - | 1 | 0 | | |
| Discrimination at workplace | 0 | 0 | - | 0 | 0 | | |
| Child labour | 0 | 0 | - | 0 | 0 | | |
| Forced labour /Involuntary labour | 0 | 0 | - | 0 | 0 | | |
| Wages | 0 | 0 | - | 0 | 0 | | |
| Other human rights related issues | 0 | 0 | - | 0 | 0 | | |

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

| | FY 2024-25 | FY 2023-24 |
|---|------------|------------|
| Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | 2 | 1 |
| Complaints on POSH as a % of female employees / workers | 2.40 | 1.49 |
| Complaints on POSH upheld | 2 | 1 |

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

Bharti Hexacom guarantees protection to complainants against any form of retaliation, punishment, intimidation, coercion, dismissal, or victimisation as per the group-level Ombudsperson Policy and Prevention of Sexual Harassment (POSH) Policy. This protection extends to those who report genuine concerns in good faith, regardless of whether their claims are proven. Anyone who attempts to victimise any person who complains, co-operates, or provides information/data relating to an investigation or complaint, is liable to face punitive action.

All matters and proceedings relating to the complaint including the identity of the complainant and respondent remain strictly confidential and is not disclosed except to a competent court or a governmental agency, that has the right under the law and regulation to obtain such information. Any person who breaches the confidentiality requirement is penalised.

9. Do human rights requirements form part of your business agreements and contracts: Yes, human rights requirements form part of the key business agreements and contracts.

10. Assessments for the year:

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

11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above: During the previous year, a Human Rights Risk Assessment was conducted at a group level, which helped identify key areas for improvement. The Company is currently working towards addressing and closing these gaps.

LEADERSHIP INDICATORS

- Details of a business process being modified / introduced as a result of addressing human rights grievances / complaints: The company has an "Employee Resolution Portal" to keep track of all complaints or grievances.
- 2. Details of the scope and coverage of any Human rights due-diligence conducted.

During the previous year, a Human Rights due diligence and compliance monitoring exercise, covering 100% of its sites across all business verticals was conducted at group level covering Bharti Hexacom. The process followed a comprehensive, multi-step approach:

- i. Review of Human Rights Policy.
- ii. Integration of processes aligned with the Policy.
- iii. Periodic assessments.
- iv. Identification and evaluation of actual and potential human rights risks.
- v. Implementation of risk mitigation measures and remediation of actual impacts.
- vi. Integration of findings and actions into internal systems.
- vii. Continuous tracking of progress and updates to policies and processes, as required.
- viii. Communication of actions taken to address impacts.
- x. Periodic risk reviews by senior leadership.

The company is currently working towards closing the identified gaps and strengthening its human rights governance framework.

- 3. Is the premise /office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016: The Company has assistive devices and accessibility support which are made available to differently abled visitors.
- 4. Details on assessment of value chain partners:

| | % of value chain partners (by value of business done with such partners) that were assessed |
|----------------------------------|---|
| Sexual Harassment | 95.86 |
| Discrimination at workplace | 95.86 |
| Child Labour | 95.86 |
| Forced Labour/Involuntary Labour | 95.86 |
| Wages | 95.86 |

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above: No significant risks were identified related to human rights breaches, including child labour or forced/involuntary labour, slavery based on supplier self-assessments. The Company ensures that suppliers are aware of Bharti's Human Rights Policy as part of onboarding, annual acknowledgements, assessments and engagement initiatives. Further, suppliers have an option to report any human rights concerns through the Ombudsman process.

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

ESSENTIAL INDICATORS

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

| Parameter | Units | FY 2024-25 | FY 2023-24 |
|--|-----------|------------|------------|
| From renewable sources | | | |
| Total electricity consumption (A) | GJ | 27,151 | 6,038 |
| Total fuel consumption (B) | GJ | - | - |
| Energy consumption through other sources (C) | GJ | - | - |
| Total energy consumed from renewable sources (A+B+C) | GJ | 27,151 | 6,038 |
| From non-renewable sources | | | |
| Total electricity consumption (D) | GJ | 638,872 | 671,807 |
| Total fuel consumption (E) | GJ | 290,229 | 289,882 |
| Energy consumption through other sources (F) | GJ | - | - |
| Total energy consumed from non- renewable sources (D+E+F) | GJ | 929,101 | 961,689 |
| Total energy consumed (A+B+C+D+E+F) | GJ | 956,252 | 967,727 |
| Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations) | GJ/₹Mn | 11.19 | 13.65 |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed /Revenue from operations adjusted for PPP)* | GJ/Mn USD | 231.15 | 278.93 |
| Energy intensity in terms of physical output* | GJ/TB | 0.11 | 0.15 |

^{*}The figures have been restated due to change in methodology.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: Reasonable assurance by DNV Business Assurance India Private Limited.

- 2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any: Not applicable for telecommunication sector.
- 3. Provide details of the following disclosures related to water, in the following format:

| Parameter | Units | FY 2024-25 | FY 2023-24 |
|---|-------------|------------|------------|
| Water withdrawal by source | | | |
| (i) Surface water | Mn L | - | - |
| (ii) Groundwater | Mn L | 0.67 | 0.85 |
| (iii) Third party water | Mn L | 3.80 | 2.49 |
| (iv) Seawater/ desalinated water | Mn L | - | - |
| (v) Others | Mn L | - | - |
| Total volume of water withdrawal# (i + ii + iii + iv + v) | Mn L | 4.47 | 3.34 |
| Total volume of water consumption | Mn L | 0.61 | 0.56 |
| Water intensity per rupee of turnover (Water consumed / Revenue from operations) | Mn L/₹Mn | 0.00001 | 0.00001 |
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) | Mn L/Mn USD | 0.0001 | 0.0002 |
| (Total water consumption/ Revenue from operations adjusted for PPP)* | | | |
| Water intensity in terms of physical output | Mn L/TB | 0.000001 | 0.000001 |

^{*}The figures have been restated due to change in methodology.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: Reasonable assurance by DNV Business Assurance India Private Limited.

[#] Water withdrawal from un-metered facilities, calculated by taking 45 litre/per employee/per working day. Water from the un-metered facilities is discharged to the building's connected water system.

4. Provide the following details related to water discharged

| Parameter | Units | FY 2024-25 | FY 2023-24 |
|---|-------|---|------------|
| Water discharge by destination and level of treatment | | | |
| (i) To Surface water | Mn L | - | - |
| - No treatment | Mn L | - | - |
| - With treatment – please specify level of treatment | Mn L | - | - |
| (ii) To Groundwater | Mn L | 0.67 | 0.02 |
| - No treatment | Mn L | - | - |
| - With treatment- Primary treatment | Mn L | 0.67 | 0.02 |
| (iii) To Seawater | Mn L | - | - |
| - No treatment | Mn L | - | - |
| - With treatment – please specify level of treatment | Mn L | - | - |
| (iv) Sent to third parties | Mn L | 3.19 | 2.76 |
| - No treatment | Mn L | Water from th | |
| - With treatment – please specify level of treatment | Mn L | discharged to the building connected water system. From there the water is routed to effluent treatment plant(s), as set up by the landlord or the local authorities outside the operational boundary of the Company. | |
| (v) Others | Mn L | - | - |
| - No treatment | Mn L | - | - |
| - With treatment – please specify level of treatment | Mn L | - | - |
| Total water discharged | Mn L | 3.85 | 2.78 |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. Reasonable assurance by DNV Business Assurance India Private Limited.

5. Has the entity implemented a mechanism for Zero Liquid Discharge (ZLD)? If yes, provide details of its coverage and implementation: Bharti Hexacom has implemented various water efficiency measures including wastewater recycling and reuse at its sites and planning to achieve Zero Liquid Discharge (ZLD) in future.

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

| Parameter | Units | FY 2024-25 | FY 2023-24* |
|-------------------------------------|---------------|----------------|----------------|
| NOx | Metric Tonnes | 93 | 122 |
| SOx | Metric Tonnes | - | - |
| Particulate matter (PM) | Metric Tonnes | 5 | 5 |
| Persistent organic pollutants (POP) | Metric Tonnes | Not applicable | Not applicable |
| Volatile organic compounds (VOC) | Metric Tonnes | Not applicable | Not applicable |
| Hazardous air pollutants (HAP) | Metric Tonnes | Not applicable | Not applicable |
| Carbon Monoxide (CO) | Metric Tonnes | 69 | 92 |

^{*}The air emissions for FY 2023-24 have been restated to align with the updated DG Emissions standards by CPCB.

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

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

| Parameter | Unit | FY 2024-25 | FY 2023-24 |
|---|----------------------------|------------|------------|
| Total Scope 1 emissions - (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | tCO ₂ e | 21,448 | 21,389 |
| Total Scope 2 emissions - (Break-up of the GHG into ${\rm CO_2}$, ${\rm CH_4}$, ${\rm N_2O}$, HFCs, PFCs, SF $_6$, NF $_3$, if available) | tCO ₂ e | 129,017 | 133,615 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations) | tCO ₂ e/₹Mn | 1.76 | 2.19 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)* | tCO ₂ e/ Mn USD | 36.37 | 44.68 |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output* | tCO ₂ e/TB | 0.017 | 0.023 |

^{*}The figures have been restated due to change in methodology.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. Reasonable assurance by DNV Business Assurance India Private Limited.

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

| Sr. No. | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along with summary) | Outcome of the initiative |
|------------|-------------------------------|---|---|
| 1. | Solarisation of towers | Onsite installation of solar technology to produce renewable energy at network sites. | Resulting in renewable energy generation of 7,541,895 kWh. |
| 2. | Hybrid battery bank solutions | Installation of advanced VRLA (Valve-Regulated Lead-Acid) batteries and lithium-ion batteries. | Resulting in saving of 13,167 L of diesel. |
| 3. | Green sites | Transformation of the Company sites into eco-friendly ones. 48% of its network sites, have been tagged as green sites. | Resulting in a decrease of 100 L diesel per quarter. |
| 4. | Network site sharing | Site sharing with partners to optimise the Company's resource consumption. | Reduction of carbon emissions and waste significantly through higher utilisation of passive infrastructure. |
| 5. | Power saving feature | Optimisation of RRU through AI/ML. | Power saving as per traffic utilisation to effectively reduce GHG emissions. |
| 6. | Value chain initiatives | Airtel has undertaken science-based target to reduce our absolute scope 3 GHG emissions by 42% by 2031. | Power saving as per traffic utilisation to effectively reduce GHG emissions. |
| | | ii. Introduced guidelines for Company's suppliers to implement measures for energy efficiency and carbon emission reduction, as part of Company's Code of Conduct for Business Associates | |
| | | iii. Airtel is engaging with suppliers including equipment manufacturers to drive initiatives for enhancing energy efficiency of supplied equipment through innovative solutions | |

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

| Parameter | Units | FY 2024-25 | FY 2023-24 |
|---|---------------|------------|------------|
| Total waste generated | | | |
| Plastic waste (A) | Metric Tonnes | 1 | - |
| E-waste# (B) | Metric Tonnes | 241 | 128 |
| Battery Waste# (C) | Metric Tonnes | 760 | 422 |
| Construction and Demolition (D) | Metric Tonnes | - | - |
| Biomedical Waste (E) | Metric Tonnes | - | - |
| Radioactive waste (F) | Metric Tonnes | - | - |
| Other Hazardous waste. Please specify, if any. (G) (Cables and Lube Oil) | Metric Tonnes | 24 | 34 |
| Other Non-hazardous waste generated (H). Please specify, if any. (Paper waste, organic waste and other miscellaneous waste) | Metric Tonnes | 254 | 963 |
| Total (A + B + C + D + E + F + G + H) | Metric Tonnes | 1,280** | 1,547** |

(ii) Landfilling

Total

| Parameter | Units | FY 2024-25 | FY 2023-24 |
|--|--------------------------|--------------------|--------------|
| Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) | Metric Tonnes/ ₹ Mn | 0.015 | 0.022 |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) | Metric Tonnes/ Mn USD | 0.31 | 0.45 |
| (Total waste generated / Revenue from operations adjusted for PPP)* | | | |
| Waste intensity in terms of physical output* | Metric Tonnes/ TB | 0.00015 | 0.00023 |
| For each category of waste generated, total waste recovered through | gh recycling, re-usin | g or other recover | y operations |
| Category of waste | | | |
| (i) Recycled | Metric Tonnes | 1,280*** | 1,547*** |
| (ii) Re-used | Metric Tonnes | - | - |
| (iii) Other recovery operations | Metric Tonnes | - | - |
| Total | Metric Tonnes | 1,280*** | 1,547*** |
| For each category of waste generated, total waste disposed by natu | ire of disposal metho | od | |
| Category of waste | | | |
| (i) Incineration | Metric Tonnes | - | - |

Proactive disposal of scrap and obsolete inventory was done during the warehouse transition to streamline operations.

(iii) Other disposal operations (landlord or municipal waste collection)

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: Reasonable assurance by DNV Business Assurance India Private Limited.

Metric Tonnes

Metric Tonnes

Metric Tonnes

_

- 10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes: Bharti Hexacom has implemented the 3R strategy- Reduce, Reuse, and Recycle to promote a circular economy and ensure efficient resource utilisation. The Company has established a framework to evaluate the potential of its products for repair and refurbishment for reuse, and ensures that all hazardous waste, including e-waste and other waste, is disposed off through government-authorised and company-qualified recyclers. Further Hexacom has established supplier guidelines that mandate compliance with applicable local, national, and international environmental regulations, as well as the promotion of waste reduction practices.
- 11. If the entity has operations / offices in / around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details: Bharti Hexacom Limited does not have any offices in protected areas.*

* Bharti Hexacom offices are not located within ecologically sensitive areas. This is based on assessment of the Company's facilities against the protected sites as identified by Protected Planet.

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year: Not applicable*.

*Environmental Impact Assessment (EIA) is not applicable for the Company for the current financial year as per applicability defined in EIA Notification, 2020.

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

LEADERSHIP INDICATORS

- 1. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities: Not applicable.
- 2. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency or reduce impact due to emissions/effluent discharge/waste generated, please provide details of the same as well as outcome of such initiatives: Please refer essential indicator 8 of Principle 6 of this BRSR.
- 3. Does the entity have a business continuity and disaster management plan? Give details in 100 words/web-link: Yes, the Company is group-level ISO 22301: 2019 certified/compliant for circle offices of Bharti Hexacom, MSCs, network warehouses and operational sites according to DoT requirement.

The Company has documented business continuity plans to effectively enable all its employees to operate from secondary locations, including remote working, providing necessary infrastructure and technology. Guidelines have been shared with relevant stakeholders for disaster preparedness which includes risk identification, resource allocation, emergency response/reporting and disaster recovery.

The Company also conducts tabletop exercises, application DR testing and process recovery testing periodically to assess the preparedness in case of a disaster. Further, the Company has Network Operations Centre to monitor real-time network activity and conservative insurance cover policy for asset protection from risks e.g., fire, floods.

- 4. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard:

 There are no significant adverse environmental impacts concerning material regulatory penalties, uncontrolled large quantities of gas emissions, or hazardous waste discharge into water bodies arising from the Company's value chain partners, as per the self-assessment conducted. A significant portion of our upstream value chain emissions originates from telecom infrastructure providers. To address this, we have undertaken multiple initiatives in collaboration with them to increase the use of renewable energy and reduce fuel consumption. Additionally, a significant portion of the Company's suppliers by procurement value have indicated the adoption of carbon reduction targets as part of our annual ESG assessment process.
- 5. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts: 95.86.

^{*}The figures have been restated due to change in methodology.

^{**} Calculations are based on approximate weight of sample lot items.

^{***} Actual weight of waste sent to authorised recycler(s).

PRINCIPLE 7:

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

ESSENTIAL INDICATORS

- **1. a. Number of affiliations with trade and industry chambers/associations:** Bharti Hexacom has affiliation with one trade and industry chambers/association.
 - b. List the top 10 trade and industry chambers/associations (determined based on the total members of such a body) the entity is a member of/affiliated to:

| Sr. No. Name of the trade and industry chambers/associations | | Reach of trade and industry chambers/associations (State/National) |
|--|------------------------|--|
| 1. | GSM Association (GSMA) | International |

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities: No adverse orders were received from regulatory authorities.

LEADERSHIP INDICATORS

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

| Sr. No. | Public policy advocated | Method resorted for such advocacy | Whether information available in public domain? (Yes/No) | Frequency of Review by Board (Annually/ Half yearly/ Quarterly/ Others - please specify) | Web link, if available |
|------------|---|---|--|---|---------------------------|
| 1. | Network, Spectrum and Licensing- Efficient allocation | TRAI CP on Framework for Service Authorisations to be Granted Under the Telecommunications Act, 2023 | Yes | As and when required | Click here |
| | assignment methods to agencies like Indian | TRAI CP on Revision of National Numbering Plan | Yes | As and when required | Click here |
| | Railways; Backhaul spectrum, Spectrum for Space Based Communications. | TRAI CP on Issues Related to Critical Services in the M2M Sector, and Transfer of Ownership of M2M SIMs | Yes | As and when required | Click here |
| | New and Emerging spectrum bands, OTT Communications | TRAI CP on the terms and Conditions for the Assignment of Spectrum for Certain Satellite-Based Commercial Communication Services | Yes | As and when required | Click here |
| | | TRAI CP on The Terms and Conditions of Network Authorisations to be Granted Under the Telecommunications Act, 2023 | Yes | As and when required | Click here |
| | | TRAI CP on Auction of Frequency Spectrum in 37-37.5 GHz, 37.5-40 GHz, and 42.5-43.5 GHz bands Identified for IMT | Yes | As and when required | Click here |
| | | Consultation on Draft Telecommunications (Assignment of Spectrum through Auction) Rules, 2025, under Telecommunications Act | No | As and when required | |
| 2 | Economic Regulations, Ease | Consultation on Draft Telecommunications Right of Way Rules, 2024, under Telecommunications Act | No | As and when required | |
| | of doing business- Simplification of procedures related to Quality of Service, onboarding processes, approvals related to telecom and broadcasting | Consultation on Draft Telecommunications (Adjudication and Appeal) Rules, 2024, under Telecommunications Act | No | As and when required | |
| | | Consultation on Draft Telecommunications (Procedures and Safeguards for Lawful Interception of Messages) Rules, 2024, under Telecommunications Act | No | As and when required | |
| | | Consultation on Draft Temporary Suspension of Telecommunication Services Rules, 2024, under Telecommunications Act | No | As and when required | |
| | | Consultation on Draft Telecommunications (Radio Equipment Possession Authorisation) Rules, 2025, under Telecommunications Act | No | As and when required | |
| | | Consultation on Draft Telecommunications (Standards, Conformity Assessment and Certification) Rules, 2025, under Telecommunications Act | No | As and when required | |

| Sr. No. | Public policy advocated | Method resorted for such advocacy | Whether information available in public domain? (Yes/No) | Frequency of Review by Board (Annually/ Half yearly/ Quarterly/ Others – please specify) | Web link, if available |
|------------|--|--|--|---|---------------------------|
| | | Consultation on Draft Telecommunications (Critical Telecommunication Infrastructure) Rules, 2024, under Telecommunications Act | No | As and when required | |
| | | Consultation on Draft Telecommunications (Telecom Cyber Security) Rules, 2024, under Telecommunications Act | No | As and when required | |
| | | Consultation on Draft Telecommunications (Digital Bharat Nidhi) Rules, 2024, under Telecommunications Act | No | As and when required | |
| | | TRAI CP on Review of Telecom Consumers Protection Regulations (TCPR), 2012 | Yes | As and when required | Click here |
| | | TRAI CP on Review of the Telecom Commercial Communications Customer Preference Regulations, 2018 | Yes | As and when required | Click here |
| | | Draft The Telecommunication Tariff (71st Amendment) order, 2025 | Yes | As and when required | Click here |
| | | Draft The Telecommunication Tariff (Seventieth Amendment) Order, 2024 | Yes | As and when required | Click here |
| 3 | Broadcasting- technological | TRAI CP on Inputs for formulation of National Broadcasting Policy-2024 | Yes | As and when required | Click here |
| | convergence, DTH Consumer impact, need to review regulatory and policy framework of tariff orders | Our positions and inputs were shared with other chambers/ associations, some of whom independently incorporated some inputs in their submissions | No | As and when required | |
| | | TRAI CP on Audit related provisions of Interconnection Regulations, 2017 and Digital Addressable Systems Audit Manual | Yes | As and when required | Click here |
| | | TRAI CP on Regulatory framework for Ground-based Broadcasters | Yes | As and when required | Click here |
| | | TRAI CP on Framework for Service Authorisations for provision of Broadcasting Services under the Telecommunications Act, 2023 | Yes | As and when required | Click here |
| 4 | Technology & Consumer Affairs- emerging technology | Consultation on Draft Telecommunications (Regulatory Sandbox) Rules, 2024, under Telecommunications Act | No | As and when required | |
| | (AI); digital inclusion - digital connectivity, digital affordability, | Inputs given to industry bodies for TEC paper on "Vision, Action Plan and Strategy Paper on Circular Economy in Telecom Sector" | No | As and when required | |
| | digital accessibility; Direct to Mobile (D2M); sustainability; R&D | Inputs were provided to relevant government ministries and departments highlighting challenges faced by TSPs in adoption of Green Open Access for Telecom Networks, and, Recommendations thereof | No | As and when required | |
| | | Engagement and submissions to relevant stakeholders / Central and State Governments to resolve challenges faced by Telecom networks to access Renewable Energy through open access. Associations also independently took inputs and wrote to policymakers/regulators | | | |
| | | Inputs on RoW shared through various chambers and associations, on multiple state RoW policies and also through direct submissions on specific issues being faced by company in some states | No | As and when required | |
| | | Meity's consultation on Draft Digital Personal Data Protection Rules, 2025 | No | As and when required | |
| | | Participation in Digital India Dialogues, and Meetings with relevant ministries on Digital Personal Data Protection Act and Rules | No | As and when required | |
| | | MeitY's Report on Al Governance Guidelines Development | No | As and when required | |
| | | The Telecommunication Engineering Centre (TEC)'s Draft Standard for 'Assessing and Rating Robustness of Artificial Intelligence Systems in Telecom Networks and Digital Infrastructure | No | As and when required | |

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

ESSENTIAL INDICATORS

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year: Not applicable*.

*During the financial year, the Company has not acquired any land that would require SIA as per Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act. 2013.

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity: Not applicable*.

*During the financial year, the Company has not acquired any land that would require SIA as per Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act. 2013

As a group-level Community Grievance Redressal Policy which enables communities to express their concerns and grievances. This policy is transparent, just, fair, and timely, providing a mechanism for resolving grievances of community members. The community members can send any concerns or grievances at the dedicated e-mail: community.grievance@airtel.com. The Company strives to proactively communicate the grievance redressal procedure to its external stakeholders, during its community and stakeholder engagement activities, to raise awareness and promote accessibility for communities to voice their concerns.

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

| | FY 2024-25 | FY 2023-24* |
|--|------------|-------------|
| Directly sourced from MSMEs / small producer | 4.61 | 3.14 |
| Directly from within India | 99.09 | 97.82 |

^{*}This data pertains to procurement of goods only and does not include services.

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

| Location* | FY 2024-25** | FY 2023-24** |
|-----------------------|--------------|--------------|
| Rural | 0 | 0 |
| Semi-urban Semi-urban | 0 | 0 |
| Urban | 11 | 1.39 |
| Metropolitan | 89 | 98.61 |

 $^{{}^{\}star}\textit{Place to be categorised as per RBI Classification System-rural/semi-urban/urban/metropolitan.} \\$

LEADERSHIP INDICATORS

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above): Not applicable.

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

| Sr. No State | | Aspirational District | Amount spent (In INR) |
|--------------|----------------|-----------------------|-----------------------|
| 1 | Rajasthan | Baran | 3,06,650 |
| 2 | Bihar | Begusarai | 3,99,517 |
| 3 | Odisha | Dhenkanal | 2,27,283 |
| 4 | Uttar Pradesh | Fatehpur | 1,96,307 |
| 5 | Bihar | Gaya | 4,85,030 |
| 6 | Bihar | Jamui | 3,23,435 |
| 7 | Maharashtra | Nandurbar | 1,34,132 |
| 8 | Karnataka | Raichur | 5,12,417 |
| 9 | Bihar | Sitamarhi | 2,07,083 |
| 10 | Uttarakhand | Udham Singh Nagar | 6,75,417 |
| 11 | Andhra Pradesh | Visakhapatnam | 21,63,570 |
| 12 | Andhra Pradesh | Y.S.R. Kadapa | 23,74,287 |
| 13 | Rajasthan | Dholpur | 4,10,917 |
| 14 | Bihar | Purnia | 2,30,703 |
| 15 | Jharkhand | Ranchi | 7,97,417 |
| 16 | Uttar Pradesh | Sonbhadra | 1,97,917 |
| 17 | Madhya Pradesh | Vidisha | 1,92,417 |
| | Total amount | | 98,34,504 |

- 3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalised / vulnerable groups? (Yes/No) Hexacom does not have any Preferential Procurement Policy as the Company believes in providing equal opportunities to all its suppliers.
 - (b) From which marginalised / vulnerable groups do you procure? Not applicable.
 - (c) What percentage of total procurement (by value) does it constitute? Not applicable.
- 4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge: Not applicable.
- 5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved: Not applicable.
- 6. Details of beneficiaries of CSR Projects:

| Sr. No. | CSR Project | No. of persons benefitted from CSR Projects | % of beneficiaries from vulnerable and marginalised groups |
|------------|--|---|--|
| 1 | To create equitable opportunities for the youth from diverse socio-economic backgrounds, especially young women and to support them to become future technology leaders, Bharti Airtel Foundation launched a national level fully funded scholarship program, the 'Bharti Airtel Scholarship'. In Partnership with Bharti Hexacom Limited, Bharti Airtel Foundation supported 247 students from 21 states. Of the total strength 51 are girl students. Selected students are from top 50 NIRF ranked institutes. Bharti Airtel Scholarship covered 100% tuition fee, hostel and mess charges and a laptop to ease their educational journey. | | 64 |

^{**} Permanent employees have been considered.

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

ESSENTIAL INDICATORS

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

Bharti Hexacom offers various channels for customers to raise complaints and provide feedback:

- i. Customers can contact the dedicated customer care service through tele-calling or Airtel Thanks App.
- ii. Complaints can also be made through the toll-free complaint center number, email channel, or Airtel Thanks App.
- iii. Relationship centers are available for customers to reach out with any queries or complaints.
- iv. Customers can also visit Bharti Hexacom offices in person.
- v. Each complaint/feedback is assigned a unique identification number and addressed within a pre-defined turnaround time.
- vi. Customers are notified of the resolution of the complaint through SMS and/or tele-calling.

For more details, on the mechanism to receive and respond to customer complaints, please refer to the Telecom Charter.

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

| | As a percentage to total turnover |
|---|-----------------------------------|
| Environmental and social parameters relevant to the product | |
| Safe and responsible usage | Not applicable* |
| Recycling and / or safe disposal | |

^{*}Hexacom provides telecom services and does not manufacture any physical products. In mobile services, no equipment is provided to customers except SIM card. In fixed line services, Customer Premises Equipment ('CPE') is supplied (not sold) to customers for rendering the services. The ownership and effective control over the SIM/CPE always remain with Hexacom. Customer is required to return the SIM/CPE immediately upon termination of the Relationship Period or at the end of life.

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

| | FY 2024-25 | | | FY 2023-24 | | |
|---------------------------------|--------------------------|---|----------------|-----------------------------|---|-----------------|
| | Received during the year | Pending resolution at end of year | Remarks | Received during the year | Pending resolution at end of year | Remarks |
| Data privacy | 0 | 0 | - | 0 | 0 | |
| Advertising | 0 | 0 | - | 0 | 0 | |
| Cyber-security | 0 | 0 | - | 0 | 0 | |
| Restrictive Trade Practices* | 0 | 0 | - | 0 | 0 | |
| Unfair Trade Practices* | 0 | 0 | - | 0 | 0 | |
| Delivery of essential services | provisions under T | ints are resolved The Telecom Consulare also reported to | mers Complaint | Redressal Regulat | ion, 2012 issued by | y TRAI and to t |

^{*} No complaint was received under The Competition Act, 2002.

4. Details of instances of product recalls on account of safety issues: Not applicable*.

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

Yes, the company has adopted various measures to safeguard data security and maintain the privacy of personal information which include:

i. The implementation of internal controls.

- ii. The development of group-level Bharti Airtel Information Security Policy ('BISP'), which outlines specific guidelines for information security and cybersecurity. The BISP is readily accessible on the Company's intranet portal.
- Additionally, a group-level Information Security Risk Assessment and recovery strategy in place that aligns with the ISO 27001 and ISO 22301 standards.
- iv. To ensure the protection and confidentiality of customers' personal information, Airtel has also established the Bharti Airtel Data Privacy Policy ('BDPP'). The Online Privacy Policy serves to inform customers about the nature of information collected and their rights in relation to their data.
- 6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber-security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services: Bharti Hexacom follows the guidelines issued by the Advertising Standards Council of India (ASCI) and the guidelines for Prevention of Misleading Advertisements and Endorsements for Misleading Advertisements, 2022. Any specific complaints warranting any corrective measures are promptly addressed to resolve any possibility of miscommunication through advertisement.
- 7. Provide the following information relating to data breaches:
 - (a) Number of instances of data breaches: Nil.
 - (b) Percentage of data breaches involving personally identifiable information of Customers: Nil.
 - (c) Impact, if any, of the data breaches: Not applicable.

LEADERSHIP INDICATORS

- 1. Channels/platforms where information on products and services of the entity can be accessed (provide web link, if available): Please refer to www.bhartihexacom.in.
- 2. Steps taken to inform and educate consumers about safe and responsible usage of products and/ or services:

Bharti Hexacom abides by TRAI's clause 17 of the Telecom Consumers Complaint Redressal Regulation, 2012 by releasing the Telecom Consumers Charter, which intends to enlighten customers about their entitlements, duties, quality benchmarks established by the Authority, and methods of addressing conflicts. Furthermore, the Company adopts preventive measures to educate and create awareness amongst users on ways to protect themselves against fraudulent activities such as KYC frauds, sharing of passwords, etc. as mandated from the regulatory/licensor from time to time.

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

Ensuring consistent network coverage for customers is a crucial aspect of the Company's service, which they strive to maintain even during catastrophic events. The Company take proactive measures to keep their customers informed about the launch of new sites and any mass outages in the Radio Access Network (RAN) through SMS.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Not applicable*.

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Did your entity carry out any survey with regard to consumer satisfaction relating to the major products/ services of the entity, significant locations of operation of the entity or the entity as a whole:

Yes, the Company carries out customer satisfaction surveys for their services to gauge customer expectations and improve overall customer experience.