



# **Business Responsibility & Sustainability Reporting**



# Business Responsibility & Sustainability Reporting

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

1.	<b>Corporate Identity Number (CIN) of the Listed Entity</b>	L74899DL1995PLC067527
2.	<b>Name of the Listed Entity</b>	Bharti Hexacom Limited ('Bharti Hexacom' or 'Hexacom' or 'Company')
3.	<b>Year of incorporation</b>	1995
4.	<b>Registered office address</b>	Bharti Crescent, 1, Nelson Mandela Road, Vasant Kunj, Phase II, New Delhi-110070, India
5.	<b>Corporate address</b>	Bharti Crescent, 1, Nelson Mandela Road, Vasant Kunj, Phase II, New Delhi-110070, India
6.	<b>E-mail</b>	<a href="mailto:bhartihexacom@bharti.in">bhartihexacom@bharti.in</a>
7.	<b>Telephone</b>	+91-11-4666 6100
8.	<b>Website</b>	<a href="https://bhartihexacom.in">https://bhartihexacom.in</a>
9.	<b>Financial year for which reporting is being done</b>	FY 2023-24
10.	<b>Name of the Stock Exchange(s) where shares are listed</b>	BSE Limited (BSE), National Stock Exchange of India Limited (NSE) with effect from April 12, 2024
11.	<b>Paid-up Capital</b>	₹ 2,500 Mn.
12.	<b>Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report</b>	Company Secretary & Compliance Officer, Richa Gupta Rohatgi Telephone Number: +91-11-4666 6100 Email id: <a href="mailto:bhartihexacom@bharti.in">bhartihexacom@bharti.in</a>
13.	<b>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)</b>	Standalone basis - Bharti Hexacom Limited, unless otherwise specified
14.	<b>Name of assurance provider</b>	BDO India LLP
15.	<b>Type of assurance obtained</b>	Limited Assurance

### II. Products/services

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

S. No.	Description of main activity	Description of business activity	% of turnover of the entity
1.	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):

S. No.	Product/service	NIC code	% of total turnover contributed
1.	<b>Wireless telecommunication activities</b>		
	i. Activities of internet access by the operator of the wireless infrastructure (61201)	612	97.10
	ii. Activities of maintaining and operating, cellular and other telecommunication networks (61202)		
	iii. Activities of other wireless telecommunications activities (61209)		
2.	<b>Wired telecommunication activities</b>		
	i. Activities of basic telecom services: telephone, telex and telegraph (includes the activities of STD/ISD booths) (61101)	611	2.90
	ii. 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	11	11
International**	Not applicable	Not applicable	Not applicable

\* Mobile towers are not included.

\*\* Bharti Hexacom has no international operations.

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

##### a. Number of locations:

Locations	Number
National (No. of states)	7
International (No. of countries)*	Not applicable

\* Bharti Hexacom has no international operations.

##### b. What is the contribution of exports as a percentage of total turnover of the entity? 0.17%

##### c. A brief on types of customers: End consumers (B2C), Business customers (B2B)

### IV. Employees

#### 20. Details as at the end of financial year i.e., as on March 31, 2024

##### a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>Employees</b>						
1.	Permanent (D)	424	370	87	54	13
2.	Other than permanent (E)	-	-	-	-	-
3.	<b>Total employees (D + E)</b>	<b>424</b>	<b>370</b>	<b>87</b>	<b>54</b>	<b>13</b>
<b>Workers</b>						
4.	Permanent (F)	-	-	-	-	-
5.	Other than permanent (G)	1,110	1,097	99	13	1
6.	<b>Total workers (F + G)</b>	<b>1,110</b>	<b>1,097</b>	<b>99</b>	<b>13</b>	<b>1</b>

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

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>Differently abled employees</b>						
1.	Permanent (D)	1	1	100	0	0
3.	<b>Total differently abled employees (D)</b>	<b>1</b>	<b>1</b>	<b>100</b>	<b>0</b>	<b>0</b>
<b>Differently abled workers</b>						
4.	Other than permanent (G)			Nil		
6.	<b>Total differently abled workers (G)</b>					

#### 21. Participation/inclusion/representation of women:

Particulars	Total (A)	No. and percentage of females	
		No. (B)	% (B / A)
Board of Directors	10	1	10
Key Management Personnel	3	1	33

As on March, 31 2024.

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

Particulars	FY 2023-24 (in %)			FY 2022-23 (in %)			FY 2021-22 (in %)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent employees	19.6	18.2	19.3	25.1	35.5	26.1	40.1	38.1	39.8


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

S. No.	Name of the holding /subsidiary/ associate companies/joint ventures (A)	Indicate whether holding/ subsidiary/ associate/joint venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	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:** ₹ 70,888 Mn.

(iii) **Net worth:** ₹ 43,514 Mn.

The CSR provisions were applicable to the Company, however the requirement to contribute 2% of average net profit of immediately preceding 3 years is not applicable.

**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):**

Stakeholder group from whom complaint is received	Grievance redressal mechanism in place (Yes/ No) (If yes, then provide web-link for grievance redress policy)	FY 2023-24			FY 2022-23		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities & NGOs	Yes, <a href="#">Communities &amp; NGOs Grievance Redressal Policy</a>	0	0	-	0	0	-
Shareholders/ Investors*	Yes, <a href="#">Shareholders</a> Yes, <a href="#">Investors</a>	0	0	-	0	0	-
Employees and workers	Yes	1	0	-	0	0	-
Customers	Yes, <a href="#">Telecom Charter</a>	Customer complaints are resolved as per applicable legislations, including sector specific regulatory provisions under the Telecom Consumers Complaint Redressal Regulation, 2012 issued by TRAI and to the extent applicable, are also reported to the regulator as per the reporting requirement prescribed thereunder.					
Value chain partners-suppliers	Yes, <a href="#">Airtel Partner World</a>	0	0	-	0	0	-
Others (channel partners)	Yes, <a href="#">Anmol Ratna Portal</a>	11	0	-	16	0	-

\* Investors include debenture holders.

**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:

Refer risk and opportunities provided in the Management Discussion and Analysis report forming part of this annual report.

**SECTION B: MANAGEMENT AND PROCESS DISCLOSURES**

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC principles and core elements .

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>									
1. a. Whether your entity’s policy /policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes/No)*	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web link of the policies, if available.	Refer Table 1 below								
2. Whether the entity has translated the policy into procedures. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
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								
<b>Governance, leadership, and oversight</b>									
7. Statement by director responsible for the business responsibility report, highlighting ESG-related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure).	Refer ‘Chairman message’ section of the Annual Report								
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.								
9. Does the entity have a specified committee of the Board/Director responsible for decision making on sustainability related issues? (Yes/No). If yes, provide details.	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	Indicate whether review was undertaken by director/committee of the Board/any other committee									Frequency (Annually/Half yearly/ Quarterly/any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Performance against above policies and follow up action.	Y	Y	Y	Y	Y	Y	Y	Y	Y	Annually							
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances.	Y	Y	Y	Y	Y	Y	Y	Y	Y	Quarterly								

\* 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	<b>Ethics, Transparency and Accountability:</b> Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable	<ul style="list-style-type: none"> <li>i. Reporting in reference to GRI standards and International Integrated Reporting Framework</li> <li>ii. Independent assurance of non-financial information as per ISAE 3000 Assurance Standard</li> <li>iii. Signatory to United Nations Global Compact</li> </ul>
	<b>Product Lifecycle Sustainability:</b> Businesses should provide goods and services in a manner that is sustainable and safe	<ul style="list-style-type: none"> <li>i. Science Based Targets initiative (SBTi)</li> <li>ii. Compliance with EMF radiation levels set by local regulations in line with ICNIRP (International Commission on Non-Ionizing Radiation Protection)</li> <li>iii. ISO 14001 : 2015 Environment Management System (EMS)</li> </ul>
P3	<b>Employee Well-being:</b> Businesses should respect and promote the well-being of all employees, including those in their value chains	<ul style="list-style-type: none"> <li>i. Signatory to United Nations Global Compact</li> <li>ii. ISO 45001 : 2018 Occupational Health and Safety Management System (OHS MS)</li> </ul>
P4	<b>Stakeholder Engagement:</b> Businesses should respect the interests of and be responsive to all its stakeholders	<ul style="list-style-type: none"> <li>i. Materiality assessment and stakeholder engagement in reference to GRI Standards and AccountAbility AA1000 principles</li> </ul>
P5	<b>Promoting Human Rights:</b> Businesses should respect and promote human rights	<ul style="list-style-type: none"> <li>i. Signatory to United Nations Global Compact</li> </ul>
P6	<b>Protection of Environment:</b> Businesses should respect and make efforts to protect and restore the environment	<ul style="list-style-type: none"> <li>i. Science Based Targets initiative (SBTi)</li> <li>ii. Compliance with EMF radiation levels set by local regulations in line with ICNIRP (International Commission on Non-Ionizing Radiation Protection)</li> <li>iii. ISO 14001 : 2015 Environment Management System (EMS)</li> </ul>
	<b>Responsible Policy Advocacy:</b> Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent	<ul style="list-style-type: none"> <li>i. Signatory to United Nations Global Compact</li> <li>ii. Board member of GSMA- Leading international telecom association</li> </ul>
P8	<b>Support Inclusive Growth:</b> Businesses should promote inclusive growth and equitable development	<ul style="list-style-type: none"> <li>i. CSR disclosures pursuant to Section 135 of the Companies Act, 2013</li> <li>ii. Follow the guidance provided by ISO 26000</li> </ul>
P9	<b>Providing Customer Value:</b> Businesses should engage with and provide value to their consumers in a responsible manner	<ul style="list-style-type: none"> <li>i. ISO 27001 : 2013 Information Security Management System (ISMS)</li> <li>ii. ISO 22301 : 2019 Business Continuity Management System (BCMS)</li> <li>iii. TL9000 : Quality Management System</li> </ul>

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


**Table 3 – Specific commitments, goals, and targets\*:**

<b>Status Legend</b>		<b>Target achieved</b>	<b>Over-achieved</b>	<b>In-Progress</b>	<b>Not achieved</b>
<b>Specific commitments, goals and targets set by the entity</b>		<b>Performance</b>		<b>Mapped NGBRC Principle</b>	<b>Status</b>
<b>Climate change, energy efficiency and emission reduction</b>		1,111,205 tCO <sub>2</sub> e carbon emissions (scope 1 and scope 2) in FY 2023-24		P2, P6	
To reduce our carbon emissions (scope 1 and scope 2) by 50.2% by FY ending March 2031, using FY 2020-21 as baseline as per science-based targets initiative and GSMA pact					
To reduce our absolute scope 3 GHG emissions by 42% by FY ending 2031, using FY 2020-21 as baseline, as per science-based targets initiative		6,575,139 tCO <sub>2</sub> e Scope 3 emissions in FY 2023-24		P2, P6	
In line with target set by GSMA under Carbon Action Plan for telecom industry, achieve net zero carbon emissions by 2050		Airtel plans to get the long-term (net zero) targets validated by SBTi within two years		P2, P6	
<b>Resource efficiency and waste management</b>		E-waste is sold to authorized recyclers/ refurbishers		P2, P6	
Ensuring e-waste is sold to authorized recyclers/ refurbishers to ensure environmentally sound waste management					
Implementing ISO 14001 (EMS) Environment Management System by FY ending March 2024**		Achieved ISO 14001 : 2015 Environment Management System (EMS)		P6	
<b>Digital inclusion and enhanced access to ICT</b>		Enabled 4G/5G network connections			
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 smart phones, making device ownership affordable for low-income groups				P8	
<b>Diversity and inclusion</b>		15.8% women employees in workforce as on March 31, 2024		P3, P5	
Ensuring at least 20% women employees by FY ending March 2025					
<b>Employee health and well-being</b>		Achieved ISO 45001 : 2018 Occupational Health and Safety Management System (OHS MS)		P3, P5	
Implementing ISO 45001 (OHS MS) Occupational Health and Safety Management System by FY ending March 2024**					
<b>Corporate Governance and business ethics</b>		Revisited materiality assessment in FY 2023-24 to ensure continued applicability		P1, P4	
Periodically conduct materiality assessment through formal stakeholder engagement to prioritise ESG focus areas					
<b>Enhancing customer experience and satisfaction</b>		~14% reduction in overall B2C customer interactions from FY 2022-23.		P9	
To reduce B2C customer interactions by 20% by FY ending March 2025, using FY ended March, 2023 as baseline					
Maintain compliance with EMF radiation levels set by local regulations in line with ICNIRP Standards (International Commission on Non-Ionizing Radiation Protection)**		For all the base stations audited by DoT in FY 2023-24, the Company was compliant with EMF radiation levels		P2, P6, P9	

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

\*\* The scope of targets and performance is limited to Bharti Airtel Limited and Bharti Hexacom Limited.



**SECTION C: PRINCIPLE-WISE PERFORMANCE DISCLOSURE**

**PRINCIPLE 1**

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

**ESSENTIAL INDICATORS**

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes*
Board of Directors Key Managerial Personnel (KMP)		Refer to the Corporate Governance Report (CGR) of this Annual Report on page 102	
Employees other than Board of Directors or KMPs	16	Code of Conduct, Prevention of Sexual Harassment, ESG, Safety (Road Safety, Women Safety, Electrical Safety, etc.), Prevention of Sexual Harassment, ICC training, information security, business continuity including privacy awareness. Additionally, all the employees go through Information Security Awareness Sessions at the time of Joining and annually thereafter. Information Security Related Posters are circulated on fortnightly basis and phishing exercise are carried out periodically.	100
Workers	8	Code of Conduct, Prevention of Sexual Harassment (POSH), Conflict of Interest (CoI), insurance benefits, suraksha programme, safety (road safety, women safety, electrical safety, etc). Training session as well as mailers covering information security, business continuity, privacy.	100

\* Percentage indicates details of trainings extended.

- 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):** There are no such fines, settlement, and compounding fees on the Company or its directors/KMPs with regulators/law enforcement agencies/judicial institutions, in the financial year.
- 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.
- 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](#)).
- Number of directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/corruption:** There was no disciplinary action taken against any directors/KMPs/employees/workers by any law enforcement agency pertaining to bribery/corruption.



- 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 underway on issues related to fines/penalties/action taken by regulators/law enforcement agencies/judicial institutions, on cases of corruption and conflicts of interest:** Not applicable.
- 8. Number of days of accounts payables ((accounts payable \*365)/cost of goods/services procured) in the following format:**

	FY 2023-24	FY 2022-23
Number of days of accounts payables	74	72

*Note: For computing above ratio, trade payable amount has been adjusted for regulatory disputed payables, Indemnification liability and lease component of leased assets, which do not form part of operating expense.*

**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	Metrics	FY 2023-24	FY 2022-23
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
	c. 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	63.16	58.56
	b. Number of dealers/distributors to whom sales are made	977	1,064
	c. Sales to top 10 dealers/distributors as % of total sales to dealer/distributors	72.42	67.73
Share of RPTs in	a. Purchases (purchases with related parties/total purchases*)	54	61
	b. Sales (sales to related parties /total sales**)	10	16
	c. 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 Operating Expenditure.

\*\*Total revenue from operations.

**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
8	<p><b>Overall ESG</b> - Sustainability definition, NGRBC Principles, Code of Conduct for Business Associates, Human Rights Policy, Expectation from supplier's, ESG goals/commitment and BRSR core for value chain.</p> <p><b>Occupational health &amp; safety</b> - Session conducted with all network service providers by leadership team on health &amp; safety to sensitize policy compliance, enhance governance and ensure continuous improvement.</p>	95.1

- 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 abstains 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:**

Segment	FY 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
Capex	1.20	Nil	<p><b>Improve energy efficiency:</b></p> <p>Hexacom's installation of battery banks, solar power, and DC air conditioning has resulted in significant diesel consumption reduction. This translates to lower CO<sub>2</sub> emissions, contributing positively to both environmental and social well-being.</p>

- 2. a. Does the entity have procedures in place for sustainable sourcing? Yes.**
- b. If yes, what percentage of inputs were sourced sustainably? 90.6.**
- 3. Describe the processes in place to safely reclaim your products for reusing, recycling, and disposing at the end of life, for: (a) Plastics (including packaging), (b) E-waste, (c) Hazardous waste, and (d) Other waste:**
- The substantial part of Hexacom products is managed within the internal network operations. The Company is committed to the importance of reusing, reducing, and recycling waste. The processes are designed to ensure sustainable recycling of waste, including plastic waste, through government-authorized recyclers. In addition, the Company, in accordance with Extended Producer Responsibility (EPR) guidelines, collaborates with service providers to responsibly collect 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).


**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:**

Category	Total (A)	% of employees covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
<b>Permanent employees</b>											
Male	370	370	100	370	100	-	-	370	100	370	100
Female	54	54	100	54	100	54	100	-	-	54	100
<b>Total</b>	<b>424</b>	<b>424</b>	<b>100</b>	<b>424</b>	<b>100</b>	<b>54</b>	<b>100</b>	<b>370</b>	<b>100</b>	<b>424</b>	<b>100</b>

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

Category	Total (A)	% of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
<b>Other than permanent workers</b>											
Male	1,097	1,097	100	1,097	100	-	-	1,097	100	-	-
Female	13	13	100	13	100	13	100	-	-	-	-
<b>Total</b>	<b>1,110</b>	<b>1,110</b>	<b>100</b>	<b>1,110</b>	<b>100</b>	<b>13</b>	<b>100</b>	<b>1,097</b>	<b>100</b>		

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

	<b>FY 2023-24</b>	<b>FY 2022-23</b>
Cost incurred on well-being measures as a % of total revenue of the Company	0.05	0.02

**2. Details of retirement benefits, for the current and previous Financial Year:**

Benefits*	FY 2023-24			FY 2022-23		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	100	Y	100	100	Y
Gratuity	100	100	As and when applicable	100	100	As and when applicable
ESI	0.23	59	Y	1.5	12	Y

\* All statutory dues were provided to employees and workers as per applicable legislations.

- 3. Accessibility of workplaces Are the premises/offices 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 assistive devices and accessibility support which are made available to differently abled employees.
- 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:**

Benefits	Permanent employees	
	Return to work rate	Retention Rate
Male	100%	100%
Female*	Not applicable	Not applicable
<b>Total</b>	<b>100%</b>	<b>100%</b>

\*None of the female employees took parental leave in FY 2023-24.

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

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent employees	Yes, the Company has 'Employee Resolution Query Management System', administered by human resource function, which addresses issues such as service conditions, organizational policies, performance evaluations and various operational matters.
Other than permanent workers	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 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 recognized 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:**

Category	FY 2023-24				FY 2022-23					
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees*</b>										
Male	370	370	100	370	100	358	358	100	358	100
Female	54	54	100	54	100	37	37	100	37	100
<b>Total</b>	<b>424</b>	<b>424</b>	<b>100</b>	<b>424</b>	<b>100</b>	<b>395</b>	<b>395</b>	<b>100</b>	<b>395</b>	<b>100</b>
<b>Workers**</b>										
Male	1,097	1,097	100	1,097	100	480	480	100	480	100
Female	13	13	100	13	100	8	8	100	8	100
<b>Total</b>	<b>1,110</b>	<b>1,110</b>	<b>100</b>	<b>1,110</b>	<b>100</b>	<b>488</b>	<b>488</b>	<b>100</b>	<b>488</b>	<b>100</b>

\* Percentage indicates details of trainings extended.

\*\* Role based training are provided to workers basis eligibility.

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees*</b>						
Male	370	370	100	358	358	100
Female	54	54	100	37	37	100
<b>Total</b>	<b>424</b>	<b>424</b>	<b>100</b>	<b>395</b>	<b>395</b>	<b>100</b>
<b>Workers</b>						
Male	1,097	364	33	480	53	11
Female	13	0	0	8	1	13
<b>Total</b>	<b>1,110</b>	<b>364</b>	<b>33</b>	<b>488</b>	<b>54</b>	<b>11</b>

\* 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 a system?**

Yes, the Company has a comprehensive Occupational Health and Safety Management System (OHS MS) and is ISO 45001 certified. The Company has a group-level safety charter called 'Suraksha Programme'. The Company implemented a comprehensive awareness campaign about the OHS system 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?**

Bharti Hexacom recognizes and accords highest priority to safety and well-being of its employees and other stakeholders. The Company has implemented a robust Hazard Identification and Risk Assessment (HIRA) system 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 (OHS MS) at Bharti Hexacom
- ii. 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:**

- i. Monthly review of health and safety performance by management on pre-defined KPIs
- ii. 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. Conduct health and safety risk assessment for reported incidents
- ii. Use a Risk Assessment Matrix (RAM) to evaluate incident severity
- iii. Identify work-related hazards and implement corrective actions based on the assessment

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

Yes, Bharti Hexacom has implemented procedures that allow its workers to report work-related hazards and be cautious of potential risks. They can report any work-related hazards through:

- i. Toll-free number on ID card to report risks/hazards
- ii. Central generic E-mail to report risks/hazards
- iii. Local E-mail to report risks/hazards
- iv. Incident reporting app (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, Bharti Hexacom provides access to non-occupational medical and healthcare services to its employees and workers.

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

Bharti Hexacom has taken the following measures to ensure safe and healthy workplace:

- i. Bharti Hexacom prioritizes occupational health and safety through group-level 'Suraksha Programme'
- ii. A comprehensive group-level Health and Safety Policy and manual is in place to ensure a safe and incident-free workplace, including health promotion and disease prevention
- iii. A dedicated safety committee led by a safety officer, has been setup up at central level to monitor safety performance
- iv. Regular risk assessments and safety trainings for employees to identify any work-related hazards are undertaken followed by implementation of any corrective actions
- v. Fire evacuation drills are conducted quarterly, and security policies are in place to drive uniform security systems and processes across all Company assets
- vi. Safety incidents are promptly reported and investigated to prevent recurrence
- vii. Regular induction and refresher training are provided to all employees and associates/partners
- viii. Employee perception survey is conducted to assess employee satisfaction with existing safety practices and identify any areas for improvement
- ix. Various other measures are taken to promote employee health and well-being such as on-site doctors, free diagnostics, gym facilities and road safety awareness etc.

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

Category	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Working Conditions	Nil	Nil	-	Nil	Nil	-
Health & Safety	Nil	Nil	-	Nil	Nil	-

**13. 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

**14. 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 and safety practices and working conditions:**

Bharti Hexacom has implemented the following measures to address safety-related risks and hazards:

- i. Strengthened its group-level Occupational Health and Safety Policy and protocols
- ii. Rolled out group-level Consequence Management Policy to prevent recurrence of safety incidents
- iii. Defined detailed safety protocols
- iv. Circulated interactive modules to employees and workers on various safety topics
- v. Rolled out 5 golden rules of safety to promote behavioral change
- vi. Conducted awareness sessions and sensitization through case studies
- vii. Conducted detailed investigation and root cause analysis of each safety incident and communicated learnings from each incident across all operations
- viii. Safety awareness campaign - Safe by choice duly linked with #AirtelSuraksha
- ix. SWAT - 'Safety Within And Together' for employee and workers' engagement on safety programs


**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. Further, the Company uses self-assessment surveys to ensure its key value chain partners have procedures in places to ensure compliance with regulatory requirements. Suppliers with significant procurement value were assessed through these self-assessment survey, and all of them have confirmed that they are taking adequate measures to ensure compliance with statutory dues requirements.

The Company also has a framework in place to validate regulatory compliance of manpower partners related to minimum wages, PF, ESIC, gratuity, maternity benefits etc.

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

Category	Total no. of affected employees		No. of employees that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
Employees	Nil	Nil	Not applicable	Not applicable

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

Bharti Hexacom prioritizes employee career progression through diverse learning interventions tailored to enhance skills and knowledge at various stages. The Company is in process of launching group-level program on 'Retirals' for employees transitioning into retirement. The program will include modules covering purpose and meaning, health and well-being, family relationships, financial security, coping with emotional aspects, and investment strategies.

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

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	93.54
Working Conditions	93.54

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

The Occupational Health and Safety (OHS) framework has been enhanced for relevant value chain partners in terms of:

- i. Communication of policies, procedures, learnings, and best practices
- ii. Increased training and capacity building session
- iii. Sensitization by the leadership team
- iv. Health & safety reviews/audits tracked for closure
- v. Governance of health & safety incidents in value chain partners

These measures aim to ensure that the partners maintain high standards of health and safety practices.



**PRINCIPLE 4**

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

**ESSENTIAL INDICATORS**

- 1. Describe the processes for identifying key stakeholder groups of the entity:** At group-level, stakeholder engagement and materiality assessment is conducted, guided by the leading AA1000 stakeholder engagement standards to identify and prioritize key stakeholders. These stakeholders are directly or indirectly impacted by the business activities, products or services and associated performance, or to whom had, or in the future may have, legal, commercial, operational, or ethical/moral responsibilities or who can influence or have impact on strategic or operational decision-making.
- 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 & marginalized group (Yes/No)	Channels of communication (Email, SMS, newspaper, pamphlets, advertisement, community meetings, notice board, website), others	Frequency of engagement (Annually/Half Yearly/Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	i. Retail stores and contact centers across operational cities ii. E-mail, SMS communication and Company website iii. Social media engagement iv. Airtel Thanks App	On-going	i. Seeking consumer feedback on the services ii. Delivering customer service and resolving customer queries
Investors/ Shareholders	No	i. General meetings ii. Electronic correspondence	Quarterly/ Annually/On-going	i. Answer to queries of investors on operations of the Company ii. Bring transparency with the community of existing and potential investors
Employees	No	i. Company intranet portal ii. Regular employee communication forums iii. E-mail iv. Annual employee surveys	On-going	i. Learning and development ii. Employee recognition and engagement activities iii. Employee performance review and career development iv. Employee safety and well-being



Stakeholder group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of communication (Email, SMS, newspaper, pamphlets, advertisement, community meetings, notice board, website), others	Frequency of engagement (Annually/Half Yearly/Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Suppliers and network partners	No	<ul style="list-style-type: none"> <li>i. Partner portal</li> <li>ii. Company website</li> <li>iii. Annual confluence meetings</li> <li>iv. Sustainability awareness session</li> </ul>	On-going	<ul style="list-style-type: none"> <li>i. New product /technology development</li> <li>ii. Material requirement planning</li> <li>iii. Regulatory compliances including NSDTS</li> <li>iv. Assessing supplier performance</li> <li>v. Commercial and contract discussion</li> <li>vi. Supplier recognition and engagement activities</li> <li>vii. Engagement on sustainability parameters</li> </ul>
Channel partners	No	<ul style="list-style-type: none"> <li>i. E-mail, SMS communication and Company website</li> <li>ii. Channel partner portal</li> </ul>	On-going	<ul style="list-style-type: none"> <li>i. Resolving channel partner queries and operational challenges</li> <li>ii. Commission and reward scheme</li> <li>iii. Sustained marketing support</li> </ul>
Regulatory bodies	No	<ul style="list-style-type: none"> <li>i. Electronic and physical correspondence</li> <li>ii. Face to face meetings</li> </ul>	Need basis and on-going	<ul style="list-style-type: none"> <li>i. Deliberations and inputs on acts, regulations, policies that have bearing on the operations and businesses</li> <li>ii. TRAI consultations</li> <li>iii. DoT directives, Policies</li> <li>iv. Access to renewable energy through open- access</li> <li>v. Rights of Way (RoW) for telecom, Telecommunications Act, 2023</li> <li>vi. Digital Personal Data Protection Act, 2023 public policy – advocacy</li> </ul>
Community*	Yes	<ul style="list-style-type: none"> <li>i. Field visits and community meetings undertaken by Bharti Airtel Foundation during the implementation for Airtel group and program operations</li> </ul>	Periodic	<ul style="list-style-type: none"> <li>i. Education status of students enrolled</li> <li>ii. Community based issues such as hygiene, sanitation, girl-child education, etc.</li> <li>iii. Community participation in schools' activities and programs to build students' connect with communities</li> </ul>

\*Bharti Airtel Foundation is the philanthropic arm of Bharti Enterprises and is the implementation agency for carrying out CSR.

## 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, prioritizing 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 prioritize ESG topics
- ii. Insights obtained from the stakeholder engagement are analyzed to develop the materiality matrix, which helps finalize 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 prioritize environmental and social concerns. Based on the stakeholder feedback received, material issues are identified and prioritized 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

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. of employees/workers covered (B)	% (B/A)*	Total (C)	No. of employees/workers covered (D)	% (D/C) *
<b>Employees</b>						
Permanent	424	424	100	395	395	100
<b>Total employees</b>	<b>424</b>	<b>424</b>	<b>100</b>	<b>395</b>	<b>395</b>	<b>100</b>
<b>Workers</b>						
Other than permanent	1,110	1,110	100	488	488	100
<b>Total workers</b>	<b>1,110</b>	<b>1,110</b>	<b>100</b>	<b>488</b>	<b>488</b>	<b>100</b>

\* Percentage indicates details of trainings extended.

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

Category	FY 2023-24					FY 2022-23				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees</b>										
<b>Permanent</b>	<b>424</b>	<b>0</b>	<b>0</b>	<b>424</b>	<b>100</b>	<b>395</b>	<b>0</b>	<b>0</b>	<b>395</b>	<b>100</b>
Male	370	0	0	370	100	358	0	0	358	100
Female	54	0	0	54	100	37	0	0	37	100
<b>Workers</b>										
<b>Other than permanent</b>	<b>1,110</b>	<b>320</b>	<b>29</b>	<b>790</b>	<b>71</b>	<b>488</b>	<b>371</b>	<b>76</b>	<b>117</b>	<b>24</b>
Male	1,097	316	29	781	71	480	366	76	114	24
Female	13	4	31	9	69	8	5	63	3	38


**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)	Refer Annexure B of Board's report forming part of this Annual Report			
Key Managerial Personnel				
Employees other than BoD and KMP	370	675,458	54	615,000
Workers	1,097	229,482	13	252,074

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

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages*	11.64	8.48

\* 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 2023-24			FY 2022-23		
	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	1	0	-	0	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 2023-24	FY 2022-23
Total complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	1	0
Complaints on POSH as a % of female employees/workers	1.49	0
Complaints on POSH upheld	1	0

**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 penalized.

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

**10. Assessments for the year:**

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
Child labour	100
Forced/Involuntary labour	100
Sexual harassment	100
Discrimination at workplace	100
Wages	100
Others – please specify	100

**11. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 10 above:** Human Rights Risk Assessment was conducted at group-level and key improvement areas were identified.

**LEADERSHIP INDICATORS**

**1. 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.**

Human rights due diligence and compliance monitoring exercise was conducted at a group-level. This process had following key steps:

- i. Policy adoption: Implementing a comprehensive group-wide Human Rights Policy
- ii. Process integration: Embedding processes that align with the established policy
- iii. Regular assessments: Conducting periodic assessments of human rights practices across all operations
- iv. Risk identification and evaluation: Proactively identifying and evaluating potential and existing human rights risks
- v. Risk mitigation and impact remediation: Implementing measures to mitigate risks and address any identified human rights impacts
- vi. Risk integration and action: Integrating identified risks into business practices and taking appropriate actions
- vii. Continuous monitoring and improvement: Regularly tracking progress, reviewing policies and processes, and adjusting as needed
- viii. Impact communication: Transparently communicating on how the Company addresses human rights impacts



3. **Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of the 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:**

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Sexual harassment	93.54
Discrimination at workplace	93.54
Child Labour	93.54
Forced labour/Involuntary labour	93.54
Wages	93.54
Others – please specify	93.54

5. **Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 4 above:** There were no significant risks or concerns identified from assessments of critical value chain partners on human rights related issues.

**PRINCIPLE 6**

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

**ESSENTIAL INDICATORS**

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

Parameter	Units	FY 2023-24	FY 2022-23
<b>From renewable sources</b>			
Total electricity consumption (A)	GJ	6,038	535
Total fuel consumption (B)	GJ	-	-
Energy consumption through other sources (C)	GJ	-	-
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>GJ</b>	<b>6,038</b>	<b>535</b>
<b>From non-renewable sources</b>			
Total electricity consumption(D)	GJ	671,807	585,963
Total fuel consumption (E)	GJ	289,882	298,505
Energy consumption through other sources (F)	GJ	-	-
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>GJ</b>	<b>961,689</b>	<b>884,467</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>GJ</b>	<b>967,726</b>	<b>885,003</b>
<b>Energy intensity per rupee of turnover</b> (total energy consumed / revenue from operations)	<b>GJ/₹Mn.</b>	<b>13.65</b>	<b>13.45</b>
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)*</b> (total energy consumed / revenue from operations adjusted for PPP)	<b>GJ/₹Mn.</b>	<b>3.69</b>	<b>3.70</b>
<b>Energy intensity in terms of physical output</b>	<b>GJ/TB</b>	<b>0.17</b>	<b>0.19</b>

\* Adjustment for PPP has been done by taking average dollar value.

**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: BDO India LLP.

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 2023-24	FY 2022-23
<b>Water withdrawal by source</b>			
(i) Surface water	Mn. L	-	-
(ii) Groundwater	Mn. L	0.85	0.85
(iii) Third party water	Mn. L	2.49	2.58
(iv) Seawater / desalinated water	Mn. L	-	-
(v) Others	Mn. L	-	-
<b>Total volume of water withdrawal (i + ii + iii + iv + v)</b>	<b>Mn. L</b>	<b>3.34</b>	<b>3.43</b>
<b>Total volume of water consumption</b>	<b>Mn. L</b>	<b>0.56</b>	<b>0.56</b>
<b>Water intensity per rupee of turnover</b> (total water consumption / revenue from operations)	<b>Mn. L/₹ Mn.</b>	<b>0.00001</b>	<b>0.00001</b>
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)*</b> (total water consumption / revenue from operations adjusted for PPP)	<b>Mn. L/₹ Mn.</b>	<b>0.000002</b>	<b>0.000002</b>
<b>Water intensity in terms of physical output</b>	<b>Mn. L/TB</b>	<b>0.0000001</b>	<b>0.0000001</b>

\*Adjustment for PPP has been done by taking average dollar value.

The water data for non-metered facilities is estimated by taking average water withdrawal as per National Building Code, 2016 and water consumption by domestic water supply, WHO.

**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:** BDO India LLP.

4. Provide the following details related to water discharged:

Parameter	Units	FY 2023-24	FY 2022-23
<b>Water discharge by destination and level of treatment</b>			
(i) To Surface water	Mn. L	-	-
- No treatment	Mn. L	-	-
- With treatment – please specify level of treatment	Mn. L	-	-
(ii) To Groundwater	Mn. L	0.02	0.02
- No treatment	Mn. L	-	-
- With treatment – Primary treatment	Mn. L	0.02	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	2.76	2.86
- No treatment	Mn. L		
- With treatment – please specify level of treatment	Mn. L		
(v) Others	Mn. L	-	-
- No treatment	Mn. L	-	-
- With treatment – please specify level of treatment	Mn. L	-	-
<b>Total water discharged</b>	<b>Mn. L</b>	<b>2.78</b>	<b>2.88</b>

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

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 2023-24	FY 2022-23
NO <sub>x</sub>	Metric Tonnes	145	146
Particulate matter (PM)	Metric Tonnes	7	7
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	82	84

\* The air emissions have been calculated using 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:** BDO India LLP.

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

Parameter	Units	FY 2023-24	FY 2022-23
<b>Total Scope 1 emissions</b> - (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	21,389	22,170
<b>Total Scope 2 emissions</b> - (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	133,615	115,565
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover</b> (total Scope 1 and Scope 2 GHG emissions/revenue from operations)	tCO <sub>2</sub> e/HMn.	<b>2.19</b>	<b>2.09</b>
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)*</b> (total Scope 1 and Scope 2 GHG emissions/revenue from operations adjusted for PPP)	tCO <sub>2</sub> e/HMn.	<b>0.59</b>	<b>0.58</b>
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	tCO <sub>2</sub> e/TB	<b>0.028</b>	<b>0.030</b>

\* Adjustment for PPP has been done by taking average dollar value.

**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:** BDO India LLP.

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

S. No.	Initiative undertaken	Details of the initiative (web-link, if any, may be provided along with summary)	Outcome of the initiative
1.	Solarization of towers	Onsite installation of solar technology to produce renewable energy at network sites	Resulting in renewable energy generation of 1,677,108 kWh
2.	Green sites	Transformation of the Company sites into eco-friendly ones. 33% of the network sites, have been tagged as green sites	Reduction of emissions
3.	Hybrid battery bank solutions	Installation of advanced VRLA (Valve-Regulated Lead-Acid) batteries and lithium-ion batteries	Resulting in saving of 98,335 L of diesel
4.	Network site sharing	Site sharing with partners to optimize the company resource consumption. 5% of newly rolled out sites are co-located.	Reduction of carbon emissions and waste significantly through higher utilization 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	i. Airtel has undertaken science-based target to reduce our absolute scope 3 GHG emissions by 42% by 2031 ii. Introduced guidelines for our suppliers to implement measures for energy efficiency and carbon emission reduction, as part of our 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	Enhanced focus on ESG Impact across the value chain



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

Parameter	Units	FY 2023-24 <sup>#</sup>	FY 2022-23
Plastic waste (A)	Metric Tonnes	-	1
E-waste (B)	Metric Tonnes	128	123
Battery waste (C)	Metric Tonnes	422	262
Biomedical waste (D)	Metric Tonnes	-	-
Radioactive waste (E)	Metric Tonnes	-	-
Other Hazardous waste. Please specify, if any. (G) (cables, lube oil)	Metric Tonnes	34	4
Other Non-hazardous waste generated (H). Please specify, if any. (Paper waste, organic waste and other miscellaneous waste)	Metric Tonnes	963	139
<b>Total (A+B + C + D + E + G + H)</b>	<b>Metric Tonnes</b>	<b>1,547*</b>	<b>529*</b>
<b>Waste intensity per rupee of turnover</b> (total waste generated / revenue from operations)	<b>Metric Tonnes/ HMn.</b>	<b>0.022</b>	<b>0.008</b>
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)**</b> (total waste generated / revenue from operations adjusted for PPP)	<b>Metric Tonnes/ HMn.</b>	<b>0.006</b>	<b>0.002</b>
<b>Waste intensity in terms of physical output</b>	<b>Metric Tonnes/ TB</b>	<b>0.0003</b>	<b>0.0001</b>
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations</b>			
<b>Category of waste</b>			
(i) Recycled	Metric Tonnes	1,547**	538**
(ii) Re-used	Metric Tonnes	-	-
(iii) Other recovery operations	Metric Tonnes	-	-
<b>Total</b>	<b>Metric Tonnes</b>	<b>1,547**</b>	<b>538**</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method</b>			
<b>Category of waste</b>			
(i) Incineration	Metric Tonnes	-	-
(ii) Landfilling	Metric Tonnes	-	-
(iii) Other disposal operations (landlord or municipal waste collection)	Metric Tonnes	-	-
<b>Total</b>	<b>Metric Tonnes</b>	<b>-</b>	<b>-</b>

<sup>#</sup> Assets transferred in past acquisition, which had reached end of economic life, were cleared.

\* Calculations are based on approximate weight of sample lot items.

\*\* Actual weight of waste sent to authorized recycler(s).

\*\*\* Adjustment for PPP has been done by taking average dollar value.

Due to above reasons and closing stock, of waste at FY closing which will be processed in due course, waste generated does not tally with waste recycled and disposed.

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

**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 efficiently handle the waste produced in its facilities, production, and distribution processes. Further, the Company disposes all the hazardous waste, E-waste and other waste to authorized recyclers.

The Company has also established a set of supplier guidelines that mandate compliance with all relevant local, national, and international laws and conventions regarding hazardous wastes, persistent organic pollutants, and hazardous chemicals to decrease their usage. The guidelines also require suppliers to identify packaging materials that is safe, hygienic, recyclable, efficient and protective for transport of goods. Further, the Company also strives to use recyclable and recycled materials for production and packaging wherever feasible.

**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/guidelines 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 report.
- 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.  
Further, significant part of the Company's upstream scope 3 GHG emissions originate from telecom infrastructure providers. To address the same, the Company has undertaken multiple initiatives in collaboration with them to increase renewable energy usage and reduce fuel consumption.
- 5. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts:** 93.54.

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

S. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National)
1	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:**

S. 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
1.	<b>Network, Spectrum and Licensing -</b> Efficient allocation, assignment methods to agencies like Indian Railways; Backhaul spectrum, Spectrum for Space Based Communications, New and Emerging spectrum bands, OTT Communications	TRAI CP on Assignment of Additional Spectrum to Indian Railways for its Safety and Security Applications	Yes	As and when required	<a href="#">Link 1</a>
		TRAI CP on Open and De-licensed use of Unused or Limited Used Spectrum Bands for Demand Generation for Limited Period in Tera Hertz Range	Yes	As and when required	<a href="#">Link 2</a>
		TRAI CP on Assignment of Spectrum in E&V Bands, and Spectrum for Microwave Access (MWA) & Microwave Backbone (MWB)	Yes	As and when required	<a href="#">Link 3</a>
		TRAI CP on Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services	Yes	As and when required	<a href="#">Link 4</a>
		TRAI CP on Definition of International Traffic	Yes	As and when required	<a href="#">Link 5</a>
		TRAI CP on Assignment of Spectrum for Space-based Communication Services	Yes	As and when required	<a href="#">Link 6</a>
		TRAI CP on Introduction of Digital Connectivity Infrastructure Provider (DCIP) Authorization under Unified License (UL)	Yes	As and when required	<a href="#">Link 7</a>
		The Company positions and inputs were also shared with other chambers/associations, who incorporated points in their submissions to public consultations	No	As and when required	-
2.	<b>Economic Regulations, Ease of doing business -</b> Simplification of procedures related to Quality of Service, onboarding processes, approvals related to telecom and broadcasting	TRAI CP on Regulation on Rating Framework for Digital Connectivity in Buildings or Areas (Quality of Service)	Yes	As and when required	<a href="#">Link 1</a>
		TRAI CP on Review of Quality-of-Service Standards for Access Services (Wireless and Wireline) and Broadband Services (Wireless and Wireline)	Yes	As and when required	<a href="#">Link 2</a>
		TRAI - Draft Regulation on Review of The Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2023	Yes	As and when required	<a href="#">Link 3</a>
		Know your customer (KYC) norms - simplification onboarding of sales channels, authentication for e-KYC activation	No	As and when required	-
		The Company's positions and inputs were also shared with other chambers/associations, who incorporated points in their submissions to public consultations	No	As and when required	-



S. 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
3.	<b>Broadcasting -</b> technological convergence, DTH Consumer impact, need to review regulatory and policy framework of tariff orders	TRAI CP on Pre-Consultation Paper on Inputs for Formulation of "National Broadcasting Policy" - inputs by Bharti Telemedia	Yes	As and when required	<a href="#">Link 1</a>
		TRAI CP on Review of Regulatory Framework for Broadcasting and Cable services - inputs by Bharti Telemedia	Yes	As and when required	<a href="#">Link 2</a>
		Comments on the Broadcasting Services (Regulation) Bill, 2023	No	As and when required	<a href="#">Link 3</a>
		The Company's positions and inputs were shared with other chambers/ associations, some of whom independently incorporated some inputs in their submissions	No	As and when required	-
4.	<b>Technology &amp; Consumer Affairs -</b> emerging technology (AI); digital inclusion - digital connectivity, digital affordability, digital accessibility; Direct to Mobile (D2M); sustainability; R&D	TRAI CP on Encouraging R&D in Telecom, Broadcasting, and IT (ICT) Sectors	Yes	As and when required	<a href="#">Link 1</a>
		TRAI CP on Digital Inclusion in the Era of Emerging Technologies	Yes	As and when required	<a href="#">Link 2</a>
		Consultation on Direct Broadcasting to Mobile (D2M) by TEC (contribution by industry members in 3 phases and through industry bodies as well)	No	As and when required	Feb 2024 – <a href="#">Link 1</a>
					Dec 2023 – <a href="#">Link 2</a>
					Aug 2023 – <a href="#">Link 3</a>
		TRAI CP on Encouraging Innovative Technologies, Services, Use Cases, and Business Models through Regulatory Sandbox in Digital Communication Sector	Yes	As and when required	<a href="#">Link 4</a>
		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	-
	Artificial Intelligence - Inputs given to industry bodies to submit inputs on TEC paper on 'Standard for Assessing and Rating Robustness of Artificial Intelligence Systems in Telecom Networks and Digital Infrastructure'	No	As and when required	<a href="#">Link 5</a>	

S. 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
5.	<b>Electricity and Open Access:</b> Electricity for Telecom towers at industrial rates (required to keep 99.95% uptime) and easing deployment of solar/renewable energy through Open Access Policies	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  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	No	As and when required	-
6.	<b>Rights of Way (RoW):</b> Simplified, timebound permissions for RoW to establish Telecom infrastructure including for 5G network rollout	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	-
7.	<b>Privacy and Security of customers</b>	TRAI CP on Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services Participation in Digital India Dialogues, and Meetings with relevant ministries	Yes	As and when required	<a href="#">Link 1</a>
			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.

- 3. Describe the mechanisms to receive and redress grievances of the community:** Bharti Hexacom has 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](mailto: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 2023-24	FY 2022-23
Directly sourced from MSMEs/small producer*	3.14	3.76
Directly from within India*	97.82	97.49

\* 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 2023-24**	FY 2022-23**
Rural	0.00	0.00
Semi-urban	0.00	0.00
Urban	1.39	1.69
Metropolitan	98.61	98.31

\* Places have been categorized as per RBI Classification System - rural/semi-urban/urban/metropolitan.

\*\* Permanent employees have been considered.

**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. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /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 marginalized /vulnerable groups do you procure?** Not applicable.
- (c) What percentage of total procurement (by value) does it constitute?** Not applicable.
- 3. 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.
- 4. 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.

**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 group-level [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	

\* The Company 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 us. 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 2023-24			FY 2022-23		
	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	-
Cybersecurity	0	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Delivery of essential services	Customer complaints are resolved as per applicable legislations, including sector specific regulatory provisions under the Telecom Consumers Complaint Redressal Regulation, 2012 issued by TRAI and to the extent applicable, are also reported to the regulator as per the reporting requirement prescribed thereunder.					

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

\* The Company 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 us. Customer is required to return the SIM/CPE immediately upon termination of the relationship period or at the end of life.



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

Yes, the Company at group-level has measures to safeguard data security and maintain the privacy of personal information. This includes:

- 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
- iii. Additionally, a group-level Information Security Risk Assessment and recovery strategy is in place that aligns with the ISO 27001 and ISO 22301 standards
- iv. To ensure the protection and confidentiality of customers' personal information, the Company has also established the group-level Bharti Airtel Information Privacy Policy (BIPP). 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; cybersecurity 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:** 0
- (b) **Percentage of data breaches involving personally identifiable information of customers:** 0
- (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: <https://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 it strives to maintain even during catastrophic events. The Company takes proactive measures to keep the 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\*.

*\* The Company 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 us. Customer is required to return the SIM/CPE immediately upon termination of the relationship period or at the end of life.*

**Did your entity carry out any survey with regard to consumer satisfaction relating to the major products/services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No):** Yes, the Company carries out customer satisfaction surveys for its services to gauge customer expectations and improve overall customer experience.





BDO India LLP † The Palm Springs Plaza † Sector-54, Golf Course Road † Gurgaon-122001

# Independent Assurance Statement

To

**Bharti Hexacom Limited**

Bharti Crescent, 1 Nelson Mandela Road  
Vasant Kunj, Phase II  
New Delhi-110070, India

Independent Assurance Statement on non-financial disclosures in Business Responsibility & Sustainability Reporting (BRSR) for the financial year 2023-24.

## Introduction and objective of engagement

Bharti Hexacom Limited (the 'Company') has developed its Business Responsibility & Sustainability Reporting 2023-24 ('BRSR' or 'the Report') based on the BRSR reporting guidelines prescribed by SEBI for listed entities. The reporting criteria have been derived from the Principles of National Guidelines on Responsible Business Conduct (NGRBC), and Greenhouse Gas (GHG) Protocol - A Corporate Accounting and Reporting Standard.

BDO India LLP (BDO) was engaged by the Company to provide independent 'limited' assurance on non-financial sustainability disclosures in the report for the period 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024.

## The Company's responsibilities

The content of the Report and its presentation are the sole responsibilities of the Management of the Company. The Company's Management is also responsible for the design, implementation, and maintenance of internal controls relevant to the preparation of the Report, so that it is free from material misstatement.

## BDO's responsibility

BDO's responsibility, as agreed with the Management of the Company, is to provide assurance on the non-financial information of the Report as described in the 'Scope & boundary of assurance' section below. We do not accept or assume any responsibility for any other purpose or to any other person or organization. Any reliance a third party may place on the Report is entirely at its own risk.

## Assurance standard and criteria

We conducted our assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), "Assurance Engagements Other than Audits or Reviews of Historical Financial Information".

We applied the criteria of 'Limited' Assurance.

## Scope & boundary of assurance

We have assured non-financial information of the Report, pertaining to the Company's performance for the period 1<sup>st</sup> April 2023 through 31<sup>st</sup> March 2024 covering the boundary of the Company's operations.

## Assurance methodology

Our assurance process entailed conducting procedures to gather evidence regarding the reliability of the disclosures covered in the 'Scope and boundary of assurance'.

We conducted a review and verification of data collection, collation, and calculation methodologies, and a general review of the logic of inclusion/omission of relevant information/data in the Report. Our review process included the following steps:

- Evaluation and assessment of the appropriateness of the quantification methods used to arrive at the non-financial/sustainability information of the Report;
- Review of consistency of data/information within the Report as well as between the Report and source;



- Engagement through discussions (face to face, where possible, and some virtual) with personnel at corporate level who are accountable for the data and information presented in the Report;
- Execution of an audit trail of claims and data streams, to determine the level of accuracy in collection, transcription, and aggregation;
- Collection of evidences on select reported information. In some cases, copies of evidences were not shared with us due to confidentiality, but were reviewed and noted by our team;
- Review of data collection and management procedures, and related internal controls.

We used our professional judgement as Assurance Provider and applied appropriate risk-based approach, for determining sample for review of non-financial information for verification. The reviews were conducted virtually and at Client's office in Gurgaon, where information and evidences were made available to us.

### Inherent Limitations

There are inherent limitations in an assurance engagement, including, for example, the use of judgment and selective testing of data. Accordingly, there are possibilities that material misstatements in the sustainability information of the Report may remain undetected.

### Exclusions

The assurance scope specifically excludes:

- Data and information outside the defined reporting period (1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024);
- Review of the 'economic and/or financial performance indicators' included in the Reports or on which reporting is based; we have been informed by the Company that these are derived from the Company's audited financial records;
- The Company's statements and claims related to any topics other than those listed in the 'Scope and boundary of assurance';
- The Company's statements that describe qualitative/quantitative assertions, expression of opinion, belief, inference, aspiration, expectation, aim or future intention.

### Our observations

The sustainability disclosures of the Company, as defined under the scope and boundary of assurance, are fairly reliable and the Company has appropriately consolidated data from different sources at the central level. However, the Company may consider augmented processes for data management and internal verification for enhancing accuracy and auditability of reported information.

### Our conclusions

Based on the procedures performed, nothing has come to our attention that causes us not to believe that the disclosures of the Company within the 'Scope and boundary of assurance' are presented fairly as per the applied reporting standard.

### Our assurance team and independence

BDO India LLP is a professional services firm providing services in Advisory, Assurance, Tax, and Business Advisory Services, to both domestic and international organizations across industry sectors. Our non-financial assurance practitioners for this engagement are drawn from a dedicated Sustainability and ESG Team in the organization. This team is comprised of multidisciplinary professionals, with expertise across the domains of sustainability, global sustainability reporting standards and principles, and related assurance standards. This team has extensive experience in conducting independent assurance of sustainability data, systems, and processes across sectors and geographies. As an assurance provider, BDO India LLP is required to comply with the independence requirements set out in the International Federation of Accountants (IFAC) Code of Ethics for Professional Accountants. Our independence policies and procedures ensure compliance with the Code.

#### For BDO India LLP

#### Dipankar Ghosh

Partner & Leader | Sustainability & ESG  
 Business Advisory Services  
 Gurugram, Haryana  
 29 July 2024