



July 09, 2024

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|---|--|
| BSE Limited P J Towers, Dalal Street, Mumbai - 400 001 Security Code: 533162 | National Stock Exchange of India Limited "Exchange Plaza", Bandra Kurla Complex, Bandra (E), Mumbai - 400 051 Trading Symbol: HATHWAY |
|---|--|

Dear Sir(s)/Madam,

Sub: Business Responsibility and Sustainability Report for the financial year 2023-24

Please find enclosed herewith the Business Responsibility and Sustainability Report of the Company for the financial year 2023-24.

The Business Responsibility and Sustainability Report is also uploaded on the Company's website and can be accessed at: https://www.hathway.com/annual-reportPDF/Business%20Responsibility%20and%20Sustainability%20Report_2023-24.pdf

This is for your information and records.

Thanking you,

FOR HATHWAY CABLE AND DATACOM LIMITED

AJAY SINGH

Head Corporate Legal, Company Secretary and Chief Compliance Officer

FCS: 5189

Encl: As above

Hathway Cable and Datacom Limited

Regd.Office : 802, 8th Floor, Interface-11, Link Road, Malad West, Mumbai 400064.

Tel No. 022 - 40542500

Website : www.hathway.com Email - info@hathway.net

CIN : L64204MH1959PLC011421



BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

HATHWAY CABLE AND DATACOM LIMITED

Financial Year 2023-24

SECTION A: GENERAL DISCLOSURE**I. Details of the Listed Entity**

| | | | |
|---|--|--|-------------------|
| 1. Corporate Identity Number (CIN) of the Listed Entity | L64204MH1959PLC011421 | | |
| 2. Name of the Listed Entity | Hathway Cable and Datacom Limited | | |
| 3. Year of incorporation | 1959 | | |
| 4. Registered office address | 8 th Floor, Interface-11, Link Road, Malad West, Mumbai, Maharashtra – 400064 | | |
| 5. Corporate address | 8 th Floor, Interface-11, Link Road, Malad West, Mumbai, Maharashtra – 400064 | | |
| 6. E-mail | ajay.singh@hathway.net | | |
| 7. Telephone | 022 40542500 | | |
| 8. Website | www.hathway.com | | |
| 9. Financial year for which reporting is being done | 1 st April 2023 to 31 st March 2024 | | |
| 10. Name of the Stock Exchange(s) where shares are listed | National Stock Exchange of India Limited (NSE) and BSE Limited (BSE) | | |
| 11. Paid-up Capital | ₹ 354.02 crores | | |
| 12. | Contact Person | | |
| Name of the Person | Ajay Singh | | |
| Telephone | 022 40542500 | | |
| Email address | ajay.singh@hathway.net | | |
| 13. | Reporting Boundary | | |
| Type of Reporting | Standalone Basis | | |
| If selected consolidated: | S. No. | Name of the Subsidiaries/JVs/ Associate Companies | CIN Number |
| | 1 | Not Applicable | Not Applicable |
| 14. Name of assurance providers | - | | |
| 15. Type of assurance obtained | - | | |

II. Product/Services

| | | | | |
|--|---------------|-------------------------------------|--|--|
| 16. Details of business activities (accounting for 90% of the turnover) | S. No. | Description of Main Activity | Description of Business Activity | % Turnover of the entity |
| | 1 | Information and communication | Wired, Wireless and 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 | Broadband Service | 61104 | 100% |

III. Operations

| | | | | |
|--|-----------------|-------------------------|-----------------------|--------------|
| 18. Number of locations where plants and/or operations/offices of the entity are situated: | Location | Number of plants | No. of offices | Total |
| | National | NA | 36 | 36 |
| | International | NA | NA | NA |

| 19. Market served by the entity | Locations | Number |
|---|--|----------------------------------|
| a. No. of Locations | National (No. of States) | 10 (including 1 Union Territory) |
| | International (No. of Countries) | NA |
| b. What is the contribution of exports as a percentage of the total turnover of the entity? | | NA |
| c. A brief on types of customers | Hathway provides high-speed wired internet connectivity, including Broadband and Internet Leased Line ("ILL") Services to Business to Business (B2B) and Business to Customers (B2C) segments across India. The Company believes in continuously upgrading its technology backbone so it can deliver differentiated and quality service to its customers. The Broadband service is provided to Residential and Non-Residential customers or retail customers. The ILL service is offered to only Non-Residential Customers, including Small and Medium Enterprises and Corporates. | |

IV. Employees

20. Details as at the end of Financial Year:

| S. No. | Particulars | Total (A) | Male | | Female | |
|--------|--|------------------------------------|-------------|------------|------------|-----------|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| a. | Employees and workers (including differently abled) | | | | | |
| | | Employees | | | | |
| 1 | Permanent (D) | 258 | 248 | 96% | 10 | 4% |
| 2 | Other than Permanent (E) | 134 | 128 | 96% | 6 | 4% |
| 3 | Total Employees (D+E) | 392 | 376 | 96% | 16 | 4% |
| | | Workers | | | | |
| 4 | Permanent (F) | 67 | 61 | 91% | 6 | 9% |
| 5 | Other than Permanent (G) | 3554 | 3358 | 94% | 196 | 6% |
| 6 | Total Workers (F+G) | 3621 | 3419 | 94% | 202 | 6% |
| b. | Differently abled employees and workers | | | | | |
| | | Differently abled employees | | | | |
| 7 | Permanent (D) | 0 | 0 | 0 | 0 | 0 |
| 8 | Other than Permanent (E) | 0 | 0 | 0 | 0 | 0 |
| 9 | Total Employees (D+E) | 0 | 0 | 0 | 0 | 0 |
| | | Differently abled workers | | | | |
| 10 | Permanent (F) | 0 | 0 | 0 | 0 | 0 |
| 11 | Other than Permanent (G) | 0 | 0 | 0 | 0 | 0 |
| 12 | Total Differently Abled Employees (F+G) | 0 | 0 | 0 | 0 | 0 |

21. Participation/Inclusion/Representation of women

| S. No. | Category | Total (A) | No. and % of females | |
|--------|--------------------------|-----------|----------------------|---------|
| | | | No. (B) | % (B/A) |
| 1 | Board of Directors | 8 | 2 | 25% |
| 2 | Key Management Personnel | 3 | 0 | 0% |

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

| Category | FY 2023-24 (Turnover rate in current FY) | | | FY 2022-23 (Turnover rate in previous FY) | | | FY 2021-22 (Turnover rate in the year prior to previous FY) | | |
|---------------------|---|--------|-------|--|--------|-------|--|--------|-------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 24.3% | 10.5% | 21.2% | 17.1% | 10.5% | 16.9% | 18.7% | 48.0% | 20.0% |
| Permanent Workers | 8.2% | 0.0% | 6.5% | 7.8% | 0.0% | 7.1% | 6.9% | 30.8% | 8.9% |

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

| S. No | Name of the holding / subsidiary / associate companies / joint ventures (A) | Indicate whether it is a Holding / Subsidiary / Associate / or 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 | Channels India Network Private Limited | Subsidiary | 95.63% | No |
| 2 | Chennai Cable Vision Network Private Limited | Subsidiary | 75.99% | No |
| 3 | Elite Cable Network Private Limited | Subsidiary | 80% | No |
| 4 | Hathway Bhaskar CCN Multi Entertainment Private Limited | Subsidiary | 100% | No |
| 5 | Hathway Bhawani Cabletel & Datacom Limited | Subsidiary | 51.60% | No |
| 6 | Hathway Bhawani NDS Network Limited | Subsidiary | 26.32% | No |
| 7 | Hathway Cable MCN Nanded Private Limited | Subsidiary | 45.05% | No |
| 8 | Hathway Channel 5 Cable & Datacom Private Limited | Subsidiary | 51% | No |
| 9 | Hathway Dattatray Cable Network Private Limited | Subsidiary | 51% | No |
| 10 | Hathway Digital Limited | Subsidiary | 100% | No |
| 11 | Hathway Ice Television Private Limited | Subsidiary | 51% | No |
| 12 | Hathway Kokan Crystal Cable Network Limited | Subsidiary | 100% | No |
| 13 | Hathway Latur MCN Cable & Datacom Private Limited | Subsidiary | 51% | No |
| 14 | Hathway Mantra Cable & Datacom Limited | Subsidiary | 100% | No |
| 15 | Hathway MCN Private Limited | Subsidiary | 51% | No |
| 16 | Hathway Nashik Cable Network Private Limited | Subsidiary | 90.06% | No |
| 17 | Hathway Prime Cable & Datacom Private Limited | Subsidiary | 51% | No |
| 18 | Hathway Sai Star Cable & Datacom Private Limited | Subsidiary | 51% | No |
| 19 | Hathway Sonali OM Crystal Cable Private Limited | Subsidiary | 68% | No |
| 20 | GTPL Hathway Limited | Associate | 37.32% | No |
| 21 | Hathway VCN Cablenet Private Limited | Associate | 25.03% | No |
| 22 | Pan Cable Services Private Limited | Associate | 33.33% | No |
| 23 | Hathway SS Cable & Datacom LLP | Associate | 51% | No |

VI. CSR Details

| | |
|---|--|
| 24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: | Yes, CSR is applicable as per the section 135 of the Companies Act, 2013 to the Company. |
| (ii) Turnover (in ₹) | 6,22,67,33,831 |
| (iii) Net worth (in ₹) | 46,25,27,73,479 |

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.

| 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 | Yes | No | Nil | Nil | No Remark | Nil | Nil | No Remark |
| Investors (other than shareholders) | Yes | ESG Policy & Vigil Mechanism and Whistle-blower Policy | Nil | Nil | No Remark | Nil | Nil | No Remark |
| Shareholders | Yes | https://www.hathway.com/Home/ConsumerCorner | Nil | Nil | No Remark | 2 | Nil | No Remark |
| Employees and workers | Yes | | Nil | Nil | No Remark | Nil | Nil | No Remark |
| Customers | Yes | https://www.hathway.com/Home/ConsumerCorner | Customer complaints are resolved as per applicable legislations, including sector specific regulatory provisions under the Telecom Consumers Complaint Redressal Regulation, 2012 issued by Telecom Regulatory Authority of India ("TRAI") and to the extent applicable, are also reported to the regulator as per the reporting requirement prescribed thereunder. | | | | | |
| Value Chain Partners | Yes | No | Nil | Nil | No Remark | Nil | Nil | No Remark |

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

| Material Issue Identified | Indicate whether risk or opportunity | Rationale for identifying the risk/opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--|--------------------------------------|---|---|--|
| Climate Change Action | Risk | Climate change and extreme weather events are disrupting supply chains, endangering lives, and harming ecosystems globally. Regulatory enforcement to mitigate these impacts may result in legal and reputational risks and operational disruptions. Failure to comply with these regulations erodes stakeholder trust, impacting financial performance and hindering value creation for all stakeholders. | The Company actively implements sustainable practices and assesses climate change impacts on its operations. Emphasising transparency and stakeholder engagement, the Company strengthens its Environmental, Social, and Governance ("ESG") Policy to guide internal and external activities. This concerted effort aims to create sustainable value for all stakeholders amidst climate challenges. | Negative |
| Energy usage and management | Risk | Energy management is crucial for operational efficiency and cost reduction. Inefficient energy use increases operational expenses and carbon emissions, contributing to environmental degradation. Moreover, reliance on non-renewable energy sources poses risks associated with price volatility and supply chain disruptions, impacting financial performance and sustainability goals. | The Company focuses on implementing energy-efficient technologies and increasing the adoption of renewable energy sources, which can enhance operational resilience, reduce costs, and mitigate environmental impact. It is also building capacity to reinforce the importance of energy efficiency measures in conservation efforts are integral steps toward enhancing the sustainability of energy management practices and cost optimisation, thus ensuring long-term viability. | Negative |
| Electronic Waste Management and Circular Economy | Opportunity | The increasing volume of electronic waste presents an opportunity for Hathway to adopt circular economy principles. Effective management of electronic waste can generate revenue through recycling and refurbishment, promote resource efficiency, and enhance the brand's reputation as a sustainability leader. Embracing circular economy models fosters innovation, reduces environmental impact, and creates new revenue streams. | Hathway continuously works on establishing partnerships with recycling firms, investing in advanced recycling technologies, and developing product designs focused on reuse and recyclability. The Company is implementing take-back programmes, educating consumers on responsible disposal, and promoting the resale of refurbished products to maximise value extraction from electronic waste. The Company's ESG Policy guides its actions on embracing circular economy principles across the value chain, fostering innovation, reducing waste, and cultivating a competitive advantage in the sustainable market landscape. | Positive |
| Employee well-being and growth | Opportunity | Prioritising employee well-being and growth fosters a positive work culture, improves productivity, and enhances retention rates. Investing in employee development programmes, mental health support, and work-life balance initiatives not only boosts morale and loyalty but also attracts top talent and strengthens Hathway's employer brand. A motivated and skilled workforce drives innovation and organisational success. | Hathway focuses on implementing comprehensive wellness programmes that offer professional development opportunities and create a supportive work environment that helps employees maintain work-life balance. In addition, the Company prioritises training and development for equipping employees with relevant skills so they can advance their careers and the organisation can build a culture of continuous growth and development. | Positive |
| Workplace diversity | Opportunity | Creating a progressive and inclusive work environment that fosters diversity and offers substantial growth prospects to employees is crucial to enabling Hathway to grow and create sustainable value for its stakeholders. | The Company is focused on creating an inclusive work environment. It seeks to hire more females to balance the workforce's gender ratio. By creating an inclusive culture that celebrates and leverages the unique perspectives and talents of individuals from different backgrounds, the Company will accelerate innovation and decision-making processes while broadening equal opportunities for the growth and development of employees across the board. | Positive |
| Health and Safety | Risk | A responsible organisation must place utmost importance on protecting the occupational health and safety of its employees. This entails that their physical and mental health must be cared for through the implementation of safety measures and awareness programmes. | The Company's employee welfare policy puts employee health and safety at the core. The policy guides the Company's efforts to provide safe and hygienic working conditions for employees. Hathway recognises that a safe and conducive workplace is essential not only for employee satisfaction and productivity but also for the ongoing success of the organisation. | Negative |
| Human Rights | Risk | The Company places great importance on protecting human rights. It realises the significance of fostering positive labour relations to address the needs and rights of its entire workforce and run the business without disruptions. | The Company has a human rights policy in place that outlines acceptable behaviour at the workplace. It reinforces the Company's commitment to ensuring the protection of employee rights and prevents the use of forced or child labour and harassment on any ground. The policy also has provisions for awareness-building programmes on ethical conduct and defines the establishment of structured communication channels for employees to raise any grievances and seek redressal. By giving accessible channels for employees to voice their concerns and seek redressal, the organisation demonstrates its dedication to fostering a workplace that upholds human rights and ethical practices. | Negative |

| Material Issue Identified | Indicate whether risk or opportunity | Rationale for identifying the risk/opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|-----------------------------------|--------------------------------------|---|---|--|
| Customer Relations | Opportunity | To establish itself as a customer-focused organisation, the Company is committed to offering its customers a robust product and services portfolio supported by a differentiated value proposition and an unparalleled experience across its businesses. | The Company offers customers a broad spectrum of offerings tailored to meet individual, and enterprise-level needs of seamless connectivity to be productive and efficient in a digital world. Hathway's Responsible Marketing policy addresses the requirement of fair and rightful treatment of customers. The Company has established and maintains open lines of communication with its customers to stay abreast of their evolving needs, preferences, and expectations. | Positive |
| Responsible value chain | Risk | The Company must address problems that are concerned with quality, safety, environmental impact, and social aspects such as human rights and fair wages in its supply chain. | The Company's policy on related party transactions and ESG Policy ensures accountability on value chain partners. This policy serves as a guiding principle, promoting transparency and ethical conduct in all business dealings. Moreover, the Company has a vetting process and contractual agreements to ensure fair practices are carried out in the value chain. This proactive approach underscores Hathway's dedication to upholding the highest standards of corporate governance and ethical conduct, ultimately driving sustainable growth and long-term value creation for all stakeholders. | Negative |
| Community Welfare and Development | Opportunity | As a socially responsible organisation, community development is an essential component of the Company's approach to holistic and inclusive value creation. The Company must implement developmental programmes that foster community upliftment and generate tangible and sustainable socioeconomic benefits so that no one is left behind. | The Company's EHS and Sustainable development policies address issues that are concerned with community welfare and development in a fair and equitable manner. Moreover, the policies emphasise the importance of promoting equitable access to resources, opportunities, and benefits arising from Hathway's operations. | Positive |
| Board Ownership and Control | Opportunity | To ensure fair operations, the Company needs to set up a clear and fair Board ownership and control mechanism to run the operations. | A Code of Conduct Policy has been instituted specifically for Board members to ensure integrity is maintained. Further, the Company also has a succession plan in place to ensure continuity of leadership in the face of unforeseen leadership exits. The Code of Conduct serves as a guiding framework to promote ethical conduct, transparency, and accountability among the board members, fostering an environment of trust and credibility within the organisation, starting from the top run of leadership. | Positive |
| Business Ethics and Integrity | Opportunity | The Company upholds ethics and integrity as core principles that have fostered stakeholder confidence and enhanced its reputation. These values are important for the Company to engage in transparent and ethical business practices, ensuring its enduring success. | The Company has a Code of Conduct for internal procedures, which integrates a commitment to business ethics and integrity across every aspect of the business. The Code not only outlines expected behaviours and practices but also reinforces the organisation's commitment to upholding the highest standards of professional conduct, promoting a culture of integrity that permeates throughout the entire workforce, vendors and partners. | Positive |
| Data Privacy and Security | Risk | To safeguard the Company's operations, infrastructure, customers and internal users against cybersecurity threats, the Company must prioritise data privacy and cybersecurity by implementing measures that increase its systems and processes. | The Company has enforced a risk management policy that includes the identification of risks, development of mitigation plans and monitoring of the progress of actions undertaken to create a resilient organisation. The company has a dedicated Cyber security team, there is a SOC implemented for monitoring the real time attacks. DLP has been implemented to restrict copy and transfer of data. WAF has been implemented to protect from external attacks. On all the endpoints and servers Antivirus has been implemented. | Negative |
| Accountability and Transparency | Opportunity | The Company must consider accountability and transparency in all internal management processes. | The Company has defined Key Performance Indicators ("KPIs") for its employees that incentivise them to perform and benchmark their capabilities. Through the KPIs, the Company aims to align individual goals with organisational objectives, creating a synergistic approach to transparent performance evaluation and accountability. | Positive |
| Fair Marketing & Transparency | Risk | As a responsible organisation, Hathway needs to ensure its services are sold through transparent and fair marketing practices and delivered in line with the committed quality and performance goals. This is integral to the continued success of the organisation. Any misinformation can lead to the loss of subscribers, create a negative impact on the brand and reputation of the Company and may also lead to penalties and legal issues. | The Company has a responsible marketing policy in place to ensure customers are informed about offering attributes with clarity and accuracy and that there is no misinformation. The Company communicates all service-related information including the risks associated with their use. It also carries out customer surveys to secure transparent feedback on user experience, etc. This policy serves as a guiding framework, promoting ethical marketing practices and clear communication of all service-related information, including potential risks associated with their use. | Negative |

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

| Disclosure Questions | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--|---|-----|-----|-----|-----|-----|-----|-----|-----|
| Policy and Management Processes | | | | | | | | | |
| 1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| b. Has the policy been approved by the Board? (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| c. Web Link of the Policies, if available | Policies Hathway | | | | | | | | |
| 2. Whether the entity has translated the policy into procedures. (Yes / No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No) | Yes, the Company has a Code of conduct for business associates. The scope of the different policies is extended to partners to ensure sustainability across the value chain. This inclusive approach not only reinforces the Company's dedication to sustainability but also fosters a collaborative environment where all parties are aligned in their efforts to create shared value and drive positive change. | | | | | | | | |
| 4. Name of 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. | The Company's telecommunication equipment consists of TEC-certified Optical Network Units (ONUs). This certification validates the organisation's commitment to deploying cutting-edge technology that meets industry-leading quality and performance benchmarks, enabling the delivery of reliable and efficient communication services to its customers. | | | | | | | | |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any. | As part of its commitment to responsible and sustainable practices, the Company has been proactively addressing environmental and social concerns through its business activities. In its pursuit of continuous improvement, the organisation is working towards developing an ESG framework to manage its ESG Risks and Opportunities. Furthermore, It looks forward to setting up ESG targets and devising a structured roadmap to achieve its goal of building a sustainable business. | | | | | | | | |
| 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met. | The Company shall report its performance against set targets for key material topics mentioned in Section-A Q26, as applicable, transparently in the coming years. Further, every quarter, Hathway provides a brief insight into key business indicators for the 3 months, covering Subscriber Growth and Churn, ARPU, marketing initiatives, and various initiatives to improve consumer satisfaction. These sessions include disclosure of business performance, i.e., actuals/targets, AOP v/s Actuals, the ground situation of the business, current challenges being faced by the Company, and steps undertaken to overcome them, as well as plans for the coming quarter. This multi-faceted approach to reporting and communication reflects the organisation's recognition of the importance of transparent stakeholder engagement and its commitment to fostering an environment of openness and continuous improvement. | | | | | | | | |
| Governance, Leadership and Oversight | | | | | | | | | |
| 7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements. | Hathway is in its second year of Business Responsibility and Sustainability Reporting for FY2024. The adoption of sustainable and resilient practices is essential for organizations to be better equipped to face such challenges. As a service industry entity, we strive to provide the highest quality services to our customers in a sustainable manner. Our growth journey is characterized by fair and ethical practices, a diverse and inclusive culture, and operations that contribute to societal progress and environmental stewardship through the adoption of practices that reduce energy consumption, conserve water, manage waste, and recycle e-waste. | | | | | | | | |

We consider it imperative to integrate ESG practices into our operations. Consequently, the company has embarked on its ESG strategy journey and established a defined ESG governance structure. We have set up our strategic pillars and KPIs and will proceed with target setting in the next financial year. As an organization, we are committed to achieving the highest standards of quality across these dimensions. Numerous policies are already in place to monitor our operations, and we will continue to adopt new policies and make amendments to existing ones in response to evolving trends and statutory requirements, ensuring we meet our targets and overcome challenges.

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

The highest authority that oversees the implementation of the Business Responsibility Policy is the Board and the Board Committee 'Business Responsibility Sustainability Committee ("BRSC"). By placing the Board at the forefront of this initiative, the Company ensures that the implementation of its Business Responsibility Policy receives the utmost attention and guidance from its senior-most leadership.

Refer to the Board's Report and Corporate Governance Report in the Company's Annual Report.

9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.

Yes. The Company established a BRSC to guide the development and implementation of its ESG related goals and initiatives. The BRSR committee comprises Mr. Viren Raheja and Mr. Saurabh Sancheti who are the Non-Executive Directors of the company. It plays a crucial role in ensuring the Company's sustainability efforts are implemented efficiently and generate the desired impact.

The role of the BRSR committee is outlined below:

- To formulate and recommend to the Board a BRSR Policy or framework inter alia covering ESG principles and to recommend appropriate changes /modifications to the policy from time to time.
- Oversee the effective implementation of the BRSR Policy or framework of the Company.
- To review the performance of Business Sustainability goals, targets and strategy and guide the Company to achieve the same. When needed, the Committee can appoint consultants or advisors to provide additional knowledge and support their work.
- To review and recommend the BRSR to the Board.
- To appoint advisors/consultants to assist the Committee.
- To authorise any other official of the Company to assist the Committee in the implementation and execution of the BRSR Policy. Carry out all the functions as may be entrusted (i) by the Board of Directors, from time to time; and (ii) by the virtue of applicable provisions of the Companies Act, 2013, Rules made thereunder and other guidelines clarifications or regulations as may be issued by concerned the authorities, the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any other applicable provisions of laws, as amended from time to time.

Overall, there are 8 different Committees dedicated to supporting the needs of various stakeholder groups and overseeing the implementation of relevant initiatives.

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) | | | | | | | | |
|---|---|--------|--------|--------|--------|--------|--------|--------|--------|--|--------|--------|--------|--------|--------|--------|--------|--------|
| | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 |
| Performance against above policies and follow up action | Yes, a Board-level Committee actively monitors performance on the above Policies and assesses the progress of initiatives against stated goals. | | | | | | | | | | | | | | | | | |
| | The Committee closely evaluates how the Company is performing and how it can function better. | | | | | | | | | The Company reviews all its policies every 2-3 years as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. In addition, the Company revisits its policies whenever there are changes in regulations or business requirements. | | | | | | | | |
| Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances | Yes, the Board and the relevant Committee, as applicable, oversee compliance and maintaining records. The Annual report, as applicable, is also submitted to the appropriate government department each year. | | | | | | | | | | | | | | | | | |
| 11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 | No | No | No | No | No | No | No | No | No |
| 12. If answer to question (1) above is “No” i.e., not all Principles are covered by a policy, reasons to be stated: | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 | | | | | | | | | |
| The entity does not consider the Principles material to its business (Yes/No) | | | | | | | | | | | | | | | | | | |
| The entity is not at a stage where it is able to formulate and implement the policies on specified principles (Yes/No) | | | | | | | | | | | | | | | | | | |
| The entity does not have the financial or/human and technical resources available for the task (Yes/No) | | | | | | | | | | Not Applicable | | | | | | | | |
| It is planned to be done in the next financial year (Yes/No) | | | | | | | | | | | | | | | | | | |
| Any other reason (please specify) | | | | | | | | | | | | | | | | | | |

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**

Business activities are crucial for enhancing human well-being, but they also have the potential to affect the environment and society in diverse ways. Adopting responsible business practices can significantly reduce and manage these effects. Hathway is committed to responsible business conduct and aims to strike a balance between the interests of stakeholders, including shareholders and other providers of capital, communities the planet. The Company's sustainable commitments are underscored by a strong foundation of compliance to regulations, operating transparently, and being accountable to all stakeholders.

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 | 2 | All Principles and BRSR updates are covered under training and awareness program conducted | 100% |
| Key Management Personnel | 4 | 1. Code of Conduct 2. Anti-Bribery and Anti-Corruption Policy 3. Prevention of Sexual Harassment Policy 4. Information Security Awareness Course | 100% |
| Employees other than BODs and KMPs | 4 | 1. Code of Conduct 2. Anti-Bribery and Anti-Corruption Policy 3. Prevention of Sexual Harassment Policy 4. Information Security Awareness Course | 100% |
| Workers | 4 | 1. Code of Conduct 2. Anti-Bribery and Anti-Corruption Policy 3. Prevention of Sexual Harassment Policy 4. Information Security Awareness Course | 100% |

2. Details of fines/ penalties/ punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format.

| Monetary | | | | | |
|-----------------|-----------------|---|-----------------|-------------------|--|
| | NGRBC Principle | Name of the regulatory / enforcement agencies / judicial institutions | Amount (In INR) | Brief of the Case | Has an appeal been preferred? (Yes/No) |
| Penalty/ Fine | | | | | |
| Settlement | | | Nil | | |
| Compounding fee | | | | | |

| Non-Monetary | | | | |
|--------------|-----------------|---|-------------------|--|
| | NGRBC Principle | Name of the regulatory / enforcement agencies / judicial institutions | Brief of the Case | Has an appeal been preferred? (Yes/No) |
| Imprisonment | | | | |
| Punishment | | | None | |

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

| Case Details | Name of the regulatory/ enforcement agencies/ judicial institutions |
|--------------|---|
| | Not Applicable |

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

Yes, Hathway has an Anti-Bribery and Anti-Corruption ("ABAC") Policy. It is designed to ensure ethical business conduct and compliance with applicable laws. The policy strictly prohibits all forms of bribery and corruption, including offering, promising, giving, or accepting any inducement, payment, reward, or advantage, whether directly or indirectly, to influence business decisions. This prohibition applies to all directors, officers, employees, and business partners, including suppliers, contractors, and consultants.

Hathway's ABAC Policy emphasizes a zero-tolerance approach towards bribery and corruption, highlighting the importance of integrity and transparency in all business interactions. The policy outlines preventive measures such as training, awareness activities, incident reporting, investigation, and remediation processes to mitigate bribery-related risks. It also mandates regular reviews and audits to ensure the policy's effectiveness and alignment with anti-corruption objectives.

All personnel and business partners are encouraged to report any improper solicitations or concerns related to potential bribery, with assurances of confidentiality and protection against retaliation. The Chief of Internal Affairs is tasked with handling complaints and ensuring adherence to the policy.

The ABAC policy is available on the Company's website and can be accessed at <https://www.hathway.com/policiesPDF/Anti-Bribery%20and%20Anti-Corruption%20Policy.pdf>

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

| Category | FY 2023-24 | FY 2022-23 |
|-----------|------------|------------|
| Directors | Nil | Nil |
| KMPs | Nil | Nil |
| Employees | Nil | Nil |
| Workers | Nil | Nil |

6. Details of complaints regarding conflict of interest:

| Topic | FY 2023-24 | | FY 2022-23 | |
|--|------------|---------|------------|---------|
| | Number | Remarks | Number | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | 0 | - | 0 | - |
| Number of complaints received in relation to issues of Conflict of Interest of KMPs | 0 | - | 0 | - |

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.

There have been no instances of fines, penalties, or actions taken by regulators, law enforcement agencies, or judicial institutions on cases of corruption or conflicts of interest against Hathway.

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 | 51 | 52 |

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 | Nil | Nil |
| | b. Number of trading houses where purchases are made from | Nil | Nil |
| | 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 | Not Applicable | Not Applicable |
| | b. Number of dealers / distributors to whom sales are made | Not Applicable | Not Applicable |
| | c. Sales to top 10 dealers/ distributors as % of total sales to dealers / distributors | Not Applicable | Not Applicable |
| Share of RPTs in | a. Purchases (Purchases with related parties / Total Purchases) | 6% | 10% |
| | b. Sales (Sales to related parties / Total Sales) | 0.08% | 0.10% |
| | c. Loans & advances (Loans & advances given to related parties / Total loans & advances) | 68% | 68% |
| | d. Investments (Investments in related parties / Total Investments made) | 75% | 83% |

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 |
|---|--|--|
|---|--|--|

Hathway did not directly conduct any specific programmes related to this requirement. However, the Company consistently supports its value chain partners in promoting fair and ethical business practices within their organisations.

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, the Company does implement processes to avoid and manage potential conflicts of interest involving Board members. It has established a comprehensive Code of Conduct policy specifically for Board members, which directly addresses any potential conflicts of interest. This policy emphasises the importance of accountability, compliance, and confidentiality. By actively adhering to this policy, the Company ensures that any possible conflicts of interest at the Board level are appropriately addressed, thereby safeguarding the integrity of its decision-making processes.

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



Hathway has defined a sustainable development policy recognising the modern-day challenges of climate change that must be met with mitigation strategies for a sustainable and better future for today and future generations. The Company aims to contribute to a clean environment and a safer society. It is committed to utilising safe, resource-efficient, innovative technologies that reduce emissions and waste generated from its activities. Hathway attempts to use sustainable production and consumption practices that are essential to improving people's quality of life and conserving natural resources on the planet within its operations as well as of suppliers.

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.**

During the reporting year, the major investments have been done in process improvements.

| Type | FY 2023-24 | FY 2022-23 | Details of improvement in social and environmental aspects |
|---|------------|------------|--|
| Research & Development (R&D) | Nil | Nil | |
| Capital Expenditure (CAPEX) | 58.93% | 48.50% | The Company has made significant investments in implementing a Gigabit-capable Passive Optical Network (GPON) Field network. This is a passive network that doesn't require power and will help reduce the Company's carbon footprint. It replaces the Data Over Cable Service Interface Specification (DOCSIS) field network elements, which is an energy-intensive solution with high power consumption. |

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

No, the company does not have any specific procedures in place for sustainable sourcing. A Code of Conduct for business associates clearly defines the need for ethical and responsible behaviour while associating in a business relationship with the Company. Where the Code details the need for sustainable practices covering environmental, social and governance aspects, the Company also supports the partners in pursuit of the same. The suppliers are efficiently monitored for their compliance with varied statutes. Going forward, the Company to adopt a more defined sustainable sourcing policy that encourages a broader cross-section of vendors to adopt voluntary practices for the benefit of the environment and society at large. These initiatives will help the Company strengthen the culture of sustainability across its supply chain.

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

Not Applicable

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

| Product | Process to safely reclaim the product |
|--|---|
| a. Plastics (including packaging) | Not Applicable |
| b. E-Waste | Hathway is primarily in the business of providing services and does not manufacture any product. We have a defined process in place to safely dispose of end-of-life, faulty & non-usable products through certified e-scrappers, ensuring compliance with all Government regulations related to the safe disposal of e-waste. Additionally, we promote sustainability by reusing Optical Network Units for providing services to customers. These products are recovered through our network connection offices and refurbished for further use. |
| c. Hazardous Waste | Not Applicable |
| d. Other Waste | Not Applicable |

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.**

Not Applicable as it is a service industry.

LEADERSHIP INDICATORS

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

The Company has not yet conducted LCA for its services. However, it will identify the key aspects and assess them as part of business planning in the coming years.

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

Not applicable

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

| Indicated input Material (By Weight) | Recycled or re-used input material to total material | |
|--------------------------------------|--|------------|
| | FY 2023-24 | FY 2022-23 |
| ONUs and Modems | 44% | 24% |

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

| | FY 2023-24 | | | FY 2022-23 | | |
|--------------------------------|------------|----------|-----------------|------------|----------|-----------------|
| | Reused | Recycled | Safely Disposed | Reused | Recycled | Safely Disposed |
| Plastics (including packaging) | NA | NA | NA | NA | NA | NA |
| E-waste | 44.77 | 13.71 | Nil | 29.23 | 3.04 | Nil |
| Hazardous waste | NA | NA | NA | NA | NA | NA |
| Other waste | NA | NA | NA | NA | NA | NA |

Note: We reclaim our modems from customers in the event of service disruption due to modem failure or service termination. These modems are refurbished and then provided to both new and existing customers.

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

| Indicate Product category | Reclaimed products and their packaging materials as % of total products sold in respective category |
|---------------------------|---|
|---------------------------|---|

Not Applicable

As only Optical Network Units (ONUs) are provided to customers as a part of the Company's broadband services. The Company does not manufacture any products.

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



Hathway ensures equitable treatment and dignity for employees and workers within the organisation and its value chain. The Company aims to safeguard the health and safety of its employees at all times. It has implemented policies, processes, and systems that empower the Company's employees to avail of equal opportunities for growth and career development, fair working conditions and compensation.

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

| Category | % of employees covered by | | | | | | | | | | |
|---------------------------------------|---------------------------|------------------|---------|--------------------|--------|--------------------|--------|--------------------|--------|---------------------|--------|
| | Total (A) | 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) |
| Permanent Employees | | | | | | | | | | | |
| Male | 248 | 248 | 100% | 248 | 100% | 0 | 0% | 248 | 100% | 0 | 0% |
| Female | 10 | 10 | 100% | 10 | 100% | 10 | 100% | 0 | 0% | 0 | 0% |
| Total | 258 | 258 | 100% | 258 | 100% | 10 | 4% | 248 | 96% | 0 | 0% |
| Other than Permanent Employees | | | | | | | | | | | |
| Male | 128 | 128 | 100% | 128 | 100% | 0 | 0 | 0 | 0% | 0 | 0% |
| Female | 6 | 6 | 100% | 6 | 100% | 6 | 100% | 0 | 0% | 0 | 0% |
| Total | 134 | 134 | 100% | 134 | 100% | 6 | 4% | 0 | 0% | 0 | 0% |

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

| Category | % of employees covered by | | | | | | | | | | |
|-------------------------------------|---------------------------|------------------|---------|--------------------|--------|--------------------|--------|--------------------|--------|---------------------|--------|
| | Total (A) | 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) |
| Permanent Workers | | | | | | | | | | | |
| Male | 61 | 61 | 100% | 61 | 100% | 0 | 0% | 61 | 100% | 0 | 0% |
| Female | 6 | 6 | 100% | 6 | 100% | 6 | 100% | 0 | 0% | 0 | 0% |
| Total | 67 | 67 | 100% | 67 | 100% | 6 | 9% | 61 | 91% | 0 | 0% |
| Other than Permanent Workers | | | | | | | | | | | |
| Male | 3358 | 3358 | 100% | 3358 | 100% | 0 | 0% | 0 | 0% | 0 | 0% |
| Female | 196 | 196 | 100% | 196 | 100% | 196 | 100% | 0 | 0% | 0 | 0% |
| Total | 3554 | 3554 | 100% | 3554 | 100% | 196 | 6% | 0 | 0% | 0 | 0% |

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

| | FY 2023-24 | FY 2022-23 |
|---|------------|------------|
| Cost incurred on well-being measures as a % of total revenue of the company | 0.33% | 0.69% |

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

| Sr. No. | Benefits | FY 2023-24 | | | FY 2022-23 | | |
|---------|---|--|---|--|--|---|--|
| | | No. of employees covered as a % of total employees | No. of workers covered as a % of total worker | 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 worker | Deducted and deposited with the authority (Y/N/N.A.) |
| 1 | PF | 100% | 100% | Y | 100% | 100% | Y |
| 2 | Gratuity | 100% | 100% | Y* | 100% | 100% | Y* |
| 3 | ESIC | 0% | 38% | Y | 0% | 47% | Y |
| 4 | Others-NPS- National Pension Scheme (voluntary) | 5% | 0% | Y | 3% | 0% | Y |

* Funding with Trust for On-Roll Employees

3. Accessibility of workplaces:

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

Yes, the Company's offices are in commercial establishments with premises accessible to differently abled employees and workers. The buildings have provisions for elevators and wheelchairs. There is a support staff cum receptionist at all locations who have the responsibility to help such employees and workers as and when needed. This initiative underscores the Company's commitment to fostering an inclusive and supportive work environment for all.

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

The Company does not have a specific equal opportunity policy, but it has a welfare policy that advocates non-discrimination or harassment on the grounds of any form of disability. This policy underscores Hathway's commitment to promoting inclusivity and ensuring that individuals with disabilities are afforded fair and equitable treatment in all aspects of employment and engagement with the Company. It is in the process of implementing an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016.

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

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

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.

| Category | Yes/No | Details of the mechanism in brief |
|--------------------------------|--------|--|
| Permanent Workers | Yes | As mentioned in the Company's Vigil mechanism or Whistle Blower Policy, any suspected violation that is reported undergoes appropriate investigation. All information and processes disclosed during the investigation remain private and confidential, except the information required to conduct the investigation and any remedial action in accordance with the applicable laws. The complaints can be made to the immediate supervisor or received over mail at hcdl.whistleblowercomplaints@hathway.net or through a letter addressed to the Company Secretary and Compliance Officer. |
| Other than Permanent Workers | Yes | Further, in order to strengthen the existing vigil mechanism and whistle blower policy, during the year the Company has revised its Vigil Mechanism and a Whistle blower policy. Ethics & Compliance Task Force ("ECTF") comprising Chief Human Resources Officer ("CHRO"), Head Corporate Legal, Chief Financial Officer has been established which oversees and monitors the implementation of ethical business practices in the Company. ECTF evaluates incidents of suspected or actual violations of the Code of Conduct and reports them to the Audit Committee every quarter. |
| Permanent Employees | Yes | Employees are required to report actual or suspected violations of applicable laws and regulations and the Code of Conduct. Such genuine concerns (termed Reportable Matter) disclosed as per Policy are called "Protected Disclosures" and can be raised by a Whistle-blower through an e-mail or dedicated telephone line or a letter to the ECTF or to the Chairman of the Audit Committee. |
| Other than Permanent Employees | Yes | As per the Company's POSH policy that outlines provisions for raising concerns or any complaints of harassment, the complaints can be made to the reporting officer or the head of the department. In cases where the reporting officer or Head of Department is involved, the HR administrator can be contacted. The policy and complete details are given on the website. Vigil Mechanism and Whistle blower Policy - https://www.hathway.com/policiesPDF/Vigil%20Mechanism%20and%20Whistle-Blower%20Policy.pdf |

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

The company does not have any employee/worker associations.

| Category | FY 2023-24 | | | FY 2022-23 | | |
|----------------------------|--|--|-----------|--|--|-----------|
| | Total employees / workers in respective category (A) | No. of employees / workers in respective category, who are part of association(s) or Union (B) | % (B/A) | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who are part of association(s) or Union (D) | %(D/C) |
| Permanent Employees | | | | | | |
| Male | 248 | 0 | 0% | 273 | 0 | 0% |
| Female | 10 | 0 | 0% | 9 | 0 | 0% |
| Total | 258 | 0 | 0% | 282 | 0 | 0% |
| Permanent Workers | | | | | | |
| Male | 61 | 0 | 0% | 61 | 0 | 0% |
| Female | 6 | 0 | 0% | 6 | 0 | 0% |
| Total | 67 | 0 | 0% | 67 | 0 | 0% |

8. Details of training given to employees and workers:

| Category | FY 2023-24 | | | | | FY 2022-23 | | | | |
|----------------------------|------------|----------------------|-----------|----------------------|-----------|------------|----------------------|-----------|----------------------|-----------|
| | Total (A) | On Health and Safety | | On Skill Upgradation | | Total (D) | On Health and Safety | | On Skill Upgradation | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| Permanent Employees | | | | | | | | | | |
| Male | 248 | 0 | 0% | 0 | 0% | 273 | 0 | 0% | 2 | 1% |
| Female | 10 | 0 | 0% | 0 | 0% | 9 | 0 | 0% | 0 | 0% |
| Total | 258 | 0 | 0% | 0 | 0% | 282 | 0 | 0% | 2 | 1% |
| Permanent Workers | | | | | | | | | | |
| Male | 61 | 0 | 0% | 0 | 0% | 61 | 0 | 0% | 0 | 0% |
| Female | 6 | 0 | 0% | 0 | 0% | 6 | 0 | 0% | 0 | 0% |
| Total | 67 | 0 | 0% | 0 | 0% | 67 | 0 | 0% | 0 | 0% |

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

The Company has a defined succession planning process and acknowledges it as an important component to be addressed as part of strategic planning. It is critical to the success of the organisation and offers a process that recognises, develops, and retains top leadership talent. The Company outlines a development plan for each key position in the organisation. It reviews people's skills and identifies key positions that need a robust succession plan.

Note: The performance review for FY 2023-24 is due in FY 2024-25. This timely evaluation will provide valuable insights and aid in the continuous improvement of the organisation's succession planning strategies.

| Category | FY 2023-24 | | | FY 2022-23 | | |
|------------------|------------|----------|-----------|------------|------------|-------------|
| | Total (A) | No. (B) | % (B/A) | Total (C) | No. (D) | %(D/C) |
| Employees | | | | | | |
| Male | 248 | 0 | 0% | 273 | 273 | 100% |
| Female | 10 | 0 | 0% | 9 | 9 | 100% |
| Total | 258 | 0 | 0% | 282 | 282 | 100% |
| Workers | | | | | | |
| Male | 61 | 0 | 0% | 61 | 61 | 100% |
| Female | 6 | 0 | 0% | 6 | 6 | 100% |
| Total | 67 | 0 | 0% | 67 | 67 | 100% |

10. Health and safety management system:

| | |
|---|---|
| <p>a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?</p> | <p>The Company does not have a formal occupational health and safety management system. Although, the Company is committed to fostering a safe and healthy working environment at the workplace and sites, supporting the overall well-being of its workforce. It has defined Standard Operating Processes for its technicians working at sites, who are provided with Personal Protective Equipment ("PPE") like safety kits, gear, and shoes. The Company also conducts fire drills and implements health check-ups for its employees. Additionally, the Company's measures to uphold health and safety standards extend beyond its operational sites and cover its entire network of offices. These initiatives underscore the Company's unwavering commitment to fostering a safe, healthy, and nurturing work environment by adhering to industry-leading safety protocols, empowering its workforce to thrive and contribute to its sustainable growth.</p> |
| <p>b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?</p> | <p>The organisation maintains robust internal audit mechanisms that are designed to proactively identify potential hazards and assess risks on a regular and systematic basis. These comprehensive auditing procedures serve as a vigilant safeguard, enabling the prompt detection and mitigation of any potential threats or vulnerabilities that could affect the safety and well-being of the workforce.</p> |
| <p>c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)</p> | <p>Yes, work-related hazards and risks can be reported to the HR head so that action can be taken to address the identified risks or hazards.</p> |
| <p>d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)</p> | <p>Yes</p> |

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

| Safety Incident/Number | Category* | FY 2023-24 | FY 2022-23 |
|---|-----------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | Nil | Nil |
| | Workers | | |
| Total recordable work-related injuries | Employees | | |
| | Workers | | |
| No. of fatalities | Employees | | |
| | Workers | | |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | | |
| | Workers | | |

*Including in the contract workforce

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

To ensure a safe and healthy workplace, several robust policies and practices have been implemented, including Environment Health & Safety (EHS), Prevention of Sexual Harassment (POSH), and Employee Welfare initiatives.

Continuous efforts are made to improve workspaces and working conditions, with a focus on ensuring easy access to medical care. The office premises are equipped with essential safety measures such as first aid kits, fire extinguishers, and smoke detectors to promptly address any emergencies that may arise.

In addition, technical field staff are provided with PPE kits to safeguard their well-being while performing their duties. The responsibility for overseeing the implementation of health and safety policies is shared among management, departments, and relevant committees. This collaborative effort underscores the Company's steadfast dedication to creating a secure, supportive, and nurturing work environment that empowers its employees to thrive professionally and personally.

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

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

14. Assessments for the year

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

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

There were no such incidences that required corrective action to be taken.

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

a. **Employees (Yes/No):** Yes

b. **Workers (Yes/No):** Yes

The Company extends life insurance coverage to its employees, providing a significant benefit to their immediate family members in case of unfortunate events leading to death. The life insurance policy offers a payout of three times the employee's annual Cost to Company (CTC) to their designated beneficiaries.

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

The Company places paramount importance on regulatory compliance, ensuring that all statutory dues are deducted and deposited by its value chain partners. To ensure the paid challans are verified and validated before engaging with any vendor or business partner. In addition, the Company conducts a rigorous evaluation of their compliance status, thoroughly examining relevant licenses and registrations.

Specifically, the Company verifies the value chain partners' adherence to statutory mandates such as Provident Fund (PF) and Employee State Insurance Corporation (ESIC) obligations. This process involves verifying that taxes are deducted and deposited with the appropriate government authorities. The Company requires documented proof of compliance from value chain partners before making any payments.

This approach not only ensures legal compliance but also fosters trust and confidence among stakeholders, including government authorities, employees, and business associates.

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

| Category | Total no. of affected employees/ workers | | No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment | |
|-----------|--|------------|---|------------|
| | FY 2023-24 | FY 2022-23 | FY 2023-24 | FY 2022-23 |
| Employees | | | | |
| Workers | | | Nil | |

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

While we do not have a defined policy as of now, however we extend valuable support to retired employees to avail of retirement benefits such as PF & Gratuity. Moreover, employees can opt for the Group Medical Coverage policy, which offers extended support to the Company’s employees. By adopting this compassionate approach, the company fosters a culture of care and appreciation for its employees, recognising their invaluable contributions and ensuring that they are adequately supported throughout their journey from active service to retirement and beyond.

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 | 100% |
| Working Conditions | 100% |

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.

No significant risks or concerns were identified during the assessment. Thus, no corrective actions were taken. Hathway focuses on its employees’ health and safety, and the company works towards providing all necessary PPEs and has robust preparedness for delivering First Aid to workers and employees.

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



The Company understands the fundamental responsibility to safeguard the interests of its stakeholders, including vulnerable and marginalised groups. It aims to fulfil its duty to maximise the positive impact of its activities, products, processes, and decisions on the Company’s stakeholders.

ESSENTIAL INDICATORS

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

The Company embraces a comprehensive and inclusive approach to identify and engage with its diverse stakeholder ecosystem. This encompasses not only those individuals or entities with whom the company has direct interactions but also extends to those whose activities, whether directly or indirectly, exert an influence on the Company’s operations and performance as an entity. Hathway has identified key internal and external stakeholders who contribute to its long-term success directly or indirectly and are impacted by the Company’s activities.

Internal Stakeholders include the Company’s employees. External stakeholders include investors and shareholders, suppliers, customers, contractors, regulators, media and the community. These stakeholders are identified as key to supporting business in several ways, including but not limited to provisioning of financial support, working with the Company on business assignments, helping the Company communicate major developments and changes to the external world, influencing its business plans and decision making, etc. By fostering a deep understanding and appreciation of this intricate stakeholder ecosystem, the organisation reinforces its commitment to maintaining transparent and mutually beneficial relationships, which ultimately contributes to its sustainable growth and the creation of shared value for all parties involved.

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

| Stakeholder Group | Whether identified as Vulnerable & Marginalized Group (Yes/ No) | Channels of communication | Frequency of engagement (Annually/ Half yearly/ Quarterly /others – please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement |
|---------------------------|---|---|---|---|
| Employees | No | E-mails, regular meetings, annual programmes, cultural events, training sessions, notice board, Leadership meets. | Ongoing Annually Need basis | The organisation fosters an environment of unity and inclusivity, actively encouraging its employees to express their perspectives and insights freely. This collaborative approach extends to discussions surrounding the company's policies, objectives, strategic planning endeavours, and sustainability initiatives. |
| Investor and Shareholders | No | Meetings, Conferences, Website, Reports | Quarterly/ Annually | The organisation places a strong emphasis on nurturing an ethical environment built upon the pillars of trust and transparency. The Company is responsive to the needs of investors and shareholders. It engages with them regularly to understand and respond to their expectations and discuss key requirements and improvements in the functioning of the Company. This approach not only strengthens the bond of trust between the organisation and its investors and shareholders but also paves the way for continuous growth and innovation and ensures the Company stays relevant and responsive to the ever-changing landscape in which it operates. |
| Suppliers | No | Supplier audits | Need basis | Engaging with suppliers and aligning them with the organisation's business objectives and ethical operating principles is of paramount importance. The Company actively facilitates discussions on critical operational aspects such as health, safety, human rights, and improving service delivery for mitigating risks associated with these aspects and strengthening business continuity. |
| Customers | No | Customer Care, social media, website, applications | Need basis | Understanding the needs, expectations, and grievances of customers is the Company's key priority. By actively listening to and understanding the perspectives of its customers empowers the company to better meet their needs and forge enduring and mutually beneficial long-term relationships. Attracting and retaining customers through open, transparent and ethical engagement underpins the organisation's ability to run a sustainable and prosperous business model. |
| Community | Yes | Corporate Social Responsibility (CSR) Activities | Ongoing | The Company, as a socially responsible corporate entity, firmly believes in the principles of inclusive growth and development. Understanding the needs of communities is important to deliver on the Company's goal of facilitating a better life for all. Hathway's commitment to sustainable and equitable development is aimed to catalyse a harmonious coexistence where the prosperity of the business is intertwined with the advancement and empowerment of the communities it serves. |
| Regulators | No | Consultation Papers, Submission of Compliances | Need basis | The organisation stays abreast of all applicable statutory requirements and ensures timely submission of regulatory compliances. This proactive approach enables the company to mitigate risks associated with potential penalties, fines, or disruptions to its operations. |

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.**

Consultation with stakeholders is considered to be the primary pillar in the Company's decision-making and strategic processes to support the development and management of its sustainable business model. Various channels, including virtual platforms, in-person meetings, and social media, facilitate diverse forms of consultation with different stakeholders at a pre-determined frequency or in an ongoing or need-based manner to optimise value creation for them and society at large and minimise environmental impact.

There are separate department heads for different functions who are responsible for interacting with these stakeholders as applicable. For example, inputs from employees on any material topics that are mentioned in the section A – Q26 are taken into consideration by respective department heads. All recommendations from departmental heads go to the CHRO for final approval, who is authorised by the Board for decision-making on several aspects. The CHRO directly consults the Board as needed on business goals and meeting strategic directives as required.

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.**

Engaging stakeholders is integral for the Company to identify environmental and social material topics as well as develop interventions to manage any negative impacts. Stakeholder feedback is valued and integrated into improving the overall efficiency and efficacy of the Company's operations and sustainability mission.

In specific, employees' suggestions have contributed to changes in some policies. For example, based on the recommendation from an employee regarding the requirements of GST policy the entity introduced a more-defined GST policy enabling well-guided bookings for official visits. Updating this policy enabled better-informed bookings for official visits, showcasing the Company's commitment to responsiveness and adaptability.

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

The Company firmly integrates Corporate Social Responsibility (CSR) values into its business objectives, recognising the importance of contributing positively to society. In compliance with the relevant statutory provisions of the country, it has established a dedicated CSR committee. This committee systematically identifies CSR activities, leveraging internal consultations and external partnerships to discern the evolving needs of vulnerable and marginalised stakeholder groups. Basis such consultations, this year's focus area was the Sustainable Livelihoods Programme.

PRINCIPLE 5: Businesses should respect and promote human rights

The Company strives to provide a work environment that is free from harassment and discrimination. It has developed robust policies and systems to ensure that its employees feel empowered and safe to raise any concerns they may have. The Company conducts training and awareness programmes that emphasise the dignity, well-being, and human rights of every stakeholder, in line with benchmarked practices aligned with national and international laws.



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) |
| Employees | | | | | | |
| Permanent | 258 | 258 | 100% | 282 | 282 | 100% |
| Other than permanent | 134 | 0 | 0% | 151 | 0 | 0% |
| Total Employees | 392 | 258 | 65.82% | 433 | 282 | 65.13% |
| Workers | | | | | | |
| Permanent | 67 | 67 | 100% | 67 | 67 | 100% |
| Other than permanent | 3554 | 0 | 0% | 3803 | 0 | 0% |
| Total Workers | 3621 | 67 | 1.85% | 3870 | 67 | 1.73% |

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) |
| Employees | | | | | | | | | | |
| Permanent | | | | | | | | | | |
| Male | 248 | 0 | 0% | 248 | 100% | 273 | 0 | 0 | 273 | 100% |
| Female | 10 | 0 | 0% | 10 | 100% | 9 | 0 | 0 | 9 | 100% |
| Total | 258 | 0 | 0% | 258 | 100% | 282 | 0 | 0 | 282 | 100% |
| Other than Permanent | | | | | | | | | | |
| Male | 128 | 0 | 0% | 128 | 100% | 147 | 0 | 0 | 147 | 100% |
| Female | 6 | 0 | 0% | 6 | 100% | 4 | 0 | 0 | 4 | 100% |
| Total | 134 | 0 | 0% | 134 | 100% | 151 | 0 | 0 | 151 | 100% |
| Workers | | | | | | | | | | |
| Permanent | | | | | | | | | | |
| Male | 61 | 8 | 13% | 53 | 87% | 61 | 2 | 3% | 59 | 97% |
| Female | 6 | 0 | 0% | 6 | 100% | 6 | 0 | 0 | 6 | 100% |
| Total | 67 | 8 | 12% | 59 | 88% | 67 | 2 | 3% | 65 | 97% |
| Other than Permanent | | | | | | | | | | |
| Male | 3358 | 99 | 3% | 3259 | 97% | 3584 | 128 | 3.6% | 3456 | 96.4% |
| Female | 196 | 1 | 1% | 195 | 99% | 219 | 1 | 0.4% | 218 | 99.6% |
| Total | 3554 | 100 | 3% | 3454 | 97% | 3803 | 129 | 3.4% | 3674 | 96.6% |

3. Details of remuneration/salary/wages

a. Median remuneration / wages

| | Male | | Female | |
|----------------------------------|--------|---|--------|---|
| | Number | Median remuneration/ salary/ wages of respective category | Number | Median remuneration/ salary/ wages of respective category |
| Board of Directors (BoD) | 6 | - | 2 | - |
| Key Managerial Personnel | 3 | 1,41,16,992 | 0 | - |
| Employees other than BoD and KMP | 306 | 8,65,001 | 16 | 4,37,778 |
| Workers | 3486 | 2,73,600 | 202 | 2,39,976 |

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 | 4.43% | 4.52% |

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes, the Company has designated a central point of contact responsible for addressing human rights impacts or issues stemming from its operations. This role is fulfilled by the Regional Human Resource Department, serving as the primary conduit for employees to voice their grievances and pursue resolution on a regional basis. If an employee is dissatisfied with the resolution provided by the Regional HR Department, they have the right to escalate the issue to the Company's HR Head for further consideration. In addition to the internal mechanisms, the employees also have the option to approach the Chairman of the Audit Committee to address any grievances related to human rights violations or any other violations within the company. This provides an additional avenue for employees to seek a resolution and ensures that there is a higher level of accountability for addressing such issues. The dual mechanism ensures that employees have multiple avenues to seek resolution and that there exists a heightened level of accountability for addressing such matters within the organisation.

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

The Company has a defined Policy advocating non-discrimination, providing equal opportunities and fair treatment to all individuals without regard to race, colour, gender, religion, political opinion, nationality, or social origin, basing employment opportunities and promotions solely on merit and performance. It seeks continuous improvement of human rights protection by incorporating industry best practices, setting specific targets, reviewing performance regularly, and adapting its policies accordingly.

The Company employs a multifaceted approach to address human rights grievances, encompassing various internal mechanisms.

- Firstly, it conducts comprehensive due diligence activities to proactively identify, prevent and mitigate any adverse human rights impacts arising from its operations.
- Secondly, the Company strictly prohibits violations of human rights by its employees, affiliates, or any third parties associated with its operations.
- Thirdly, the Company integrates respect for human rights into its management systems and ensures that accessible grievance redressal mechanisms are available to all affected individuals.

Furthermore, the Company strictly prohibits the use of child and forced labour within its operations and across its value chain. It proactively strengthens awareness and respect for human rights among stakeholders and value chain partners through regular training programmes. In addition, the Company respects employees' freedom of association and collective bargaining rights, ensuring no retaliation against employees exercising these rights and adopting an open and collaborative attitude towards Trade Unions.

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 year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Sexual Harassment | 0 | 0 | No Complaints were registered | 0 | 0 | No Complaints were registered |
| 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 of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | 0 | 0 |
| Complaints on POSH as a % of female employees / workers | 0 | 0 |
| Complaints on POSH upheld | 0 | 0 |

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

The Company has instituted robust systems and policies aimed at preventing all forms of discrimination and harassment in the workplace. Should an employee encounter or witness such behaviour, they are encouraged to raise their concerns by emailing their Reporting Authority, Head of Department, or the Local HR Administrator. Upon receipt of the email, the concerned committee immediately takes up the matter and works towards a resolution while ensuring that the complainant is protected from any mistreatment. As a precautionary measure, the complainant is relocated to a different office facility and granted 15 days of leave. The Company's policies not only help prevent further incidents but also empower its employees to speak up against any form of violation without fear of retribution.

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

The Company adopts stringent measures to guarantee that its business agreements and contracts unequivocally adhere to its Code of Conduct policies, presented in easily understandable terms for all signatory parties. It ensures that stakeholders commit to compliance with pertinent laws, including Labour Law, Minimum Wage regulations, laws prohibiting Child Labour, and statutes against Harassment and Discrimination. In addition, the Company ensures that its agreements and contracts comply with all state and national guidelines for human rights requirements and are effectively communicated to all signatory parties, deepening transparency and ethical conduct throughout the business ecosystem.

10. Assessment for the year:

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|---|
| Child labour | 100% of Hathway offices were assessed for compliance with applicable laws. The Company prioritises workplace safety and a culture free from harassment and discrimination by conducting comprehensive internal audits at all of its offices, overseen by the Prevention of Sexual Harassment (POSH) committee. These audits ensure that each office environment is safe and respectful for employees. In addition to the POSH committee, various other Committees have been established to uphold and implement the Company's Code of Conduct (CoC) across its offices, ensuring compliance with regulatory laws. Regional Human Resource representatives assist in these assessments, reinforcing the Company's dedication to maintaining high standards of workplace ethics and safety throughout its organisational network. |
| Forced/involuntary labor | |
| Sexual harassment | |
| Discrimination at workplace | |
| Wages | |
| Others – please specify | |

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

No risks were found during the Company's assessments; thus, no corrective actions were required on their behalf.

LEADERSHIP INDICATORS

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

Not Applicable because no complaint was registered, due to which there is no requirement of any business process changes.

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

The Company did not conduct specific Human Rights Due Diligence. However, Hathway ensures that its employees adhere to the Company’s Code of Conduct and comply with established norms. Employees are encouraged to promptly report any incidents of human rights violations, discrimination, or misconduct to the appropriate authority or the department head.

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

The Company upholds a steadfast commitment to accessibility for all visitors, aligning with the provisions outlined in the Rights of Persons with Disabilities Act 2016. Its offices are equipped with wheelchair accessibility, functioning lifts, and all necessary equipment to ensure a comfortable experience for differently-abled visitors. This approach reflects the Company’s dedication to inclusivity and ensuring equal access for all individuals, regardless of their abilities.

4. Details on assessment of value chain partners:

| | % of value chain partners (by value of business done with such partners) that were assessed |
|--|---|
| Sexual Harassment Discrimination at workplace | The Company uses a third-party agency to audit 100% of its vendors on a quarterly basis for compliance across these aspects. |
| Child Labour Forced Labour/Involuntary Labour Wages Others – please specify | The Company emphasises the integration of ethical and sustainable practices across its entire value chain. It holds its partners accountable to adhere to its supplier code of conduct that outlines transparent guidelines for partners to follow to ensure compliance. Hathway has zero tolerance for any instances of non-compliance with its guidelines against any form of harassment, unacceptable labour practices and human rights protection. Should a partner be found in violation of the Code, the Company retains the prerogative to terminate the contract. The Company continually review its practices to ensure the highest standards of ethical and sustainable conduct throughout its value chain. |

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

No significant risks were observed. Thus, no corrective actions were required to be taken.

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

At the core of sustainable development lies the imperative to shift a focus from meeting immediate needs to also consider the needs of future generations by protecting the planet and its limited resources. The Company strives to promote long-term progress and well-being for society. This requires a holistic approach that involves the participation of all stakeholders, both internal and external, to ensure a comprehensive and integrated solution.



ESSENTIAL INDICATORS

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

| Parameter | FY 2023-24 | FY 2022-23 |
|--|------------|------------|
| From renewable sources | | |
| Total electricity consumption (A) (GJ) | Nil | Nil |
| Total fuel consumption (B) (GJ) | Nil | Nil |
| Energy consumption through other sources (C) (GJ) | Nil | Nil |
| Total energy consumption (A+B+C) (GJ) | Nil | Nil |
| From non-renewable sources | | |
| Total electricity consumption (D) (GJ) | 9821.51 | 10,149.08 |
| Total fuel consumption (E) (GJ) | 204.73 | 454.27 |
| Energy consumption through other sources (F) (GJ) | - | - |
| Total energy consumption from non-renewable sources (D+E+F) (GJ) | 10,026.24 | 10,603.35 |
| Total energy consumed (A+B+C+D+E+F) (GJ) | 10,026.24 | 10,603.35 |
| Energy intensity per rupee of turnover (Total energy consumption/turnover in rupees) (GJ per million INR) | 1.61 | 1.66 |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP) (GJ per million USD) | 36.84 | 37.98 |
| Energy intensity in terms of physical output | - | - |
| Energy intensity (optional) – the relevant metric may be selected by the entity | - | - |

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

No

2. 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

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

| Parameter | FY 2023-24 | FY 2022-23 |
|--|------------|------------|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | NIL | NIL |
| (ii) Groundwater | NIL | NIL |
| (iii) Third party water | 54536.67 | 53636.90 |
| (iv) Seawater / desalinated water | NIL | NIL |
| (v) Others (Rainwater storage) | NIL | NIL |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 54536.67 | 53636.90 |
| Total volume of water consumption (in kilolitres) | 54536.67 | 53636.90 |
| Water intensity per rupee of turnover (Water consumed / turnover) (kl per million INR of revenue) | 8.76 | 8.40 |
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) (KL per million USD) | 200.39 | 192.14 |
| Water intensity in terms of physical output | - | - |
| Water intensity (optional) – the relevant metric may be selected by the entity | - | - |

Note: We have calculated our water consumption considering an empirical factor as we do not track the actual consumption.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?

(Y/N) If yes, name of the external agency.

No

4. Provide the following details related to water discharge:

| Parameter | FY 2023-24 | FY 2022-23 |
|--|------------|------------|
| Water discharge by destination and level of treatment (in kilolitres) | | |
| (i) To Surface water | | |
| - No treatment | | |
| - With treatment – please specify level of Treatment | | |
| (ii) To Groundwater | | |
| - No treatment | | |
| - With treatment – please specify level of Treatment | | |
| (iii) To Seawater | | |
| - No treatment | | |
| - With treatment – please specify level of Treatment | | |
| (iv) Sent to third-parties | | |
| - No treatment | | |
| - With treatment – please specify level of Treatment | | |
| (v) Others | | |
| - No treatment | | |
| - With treatment – please specify level of Treatment | | |
| Total water discharged (in kilolitres) | | |

The Company uses water for drinking and sanitary purposes only.

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

No

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

Not Applicable as the Company does not have manufacturing or production units. Therefore, independent assessments, evaluations, or assurances by external agencies are not applicable to the services provided by the Company.

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

| Parameter | Please specify unit | FY 2023-24 | FY 2022-23 |
|-------------------------------------|---------------------|------------|------------|
| NOx | | | |
| SOx | | | |
| Particulate matter (PM) | | | |
| Persistent organic pollutants (POP) | | | |
| Volatile organic compounds (VOC) | | | |
| Hazardous Air Pollutants (HAP) | | | |
| Others – please specify | | | |

The Company is working on setting up measures to be able to record and report the data for this indicator.

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.

Not Applicable as the Company does not have manufacturing or production units. Therefore, independent assessments, evaluations, or assurances by external agencies are not applicable to the services provided by the Company.

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

| Parameter | Unit | FY2023-24 | FY 2022-23 |
|---|--------------------------------|-----------|----------------------|
| Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | tCO ₂ e | 1067.62* | 33.86 |
| Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | tCO ₂ e | 1953.39 | 2015.72 [#] |
| Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations) | tCO ₂ e/million INR | 0.49 | 0.32 [#] |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) | tCO ₂ e/million USD | 11.06 | 7.34 |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output | - | - | - |
| Total Scope 1 and Scope 2 emission intensity (optional)– the relevant metric may be selected by the entity | - | - | - |

*Note: We initiated recording our emissions from use of refrigerants thus our scope 1 emissions has increased from previous year.

[#]Note: Re-calculated data with updated Grid Emission factor.

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

No

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

No projects are undertaken to specifically reduce Green House gas emissions. The Company ensures that it uses its resources responsibly and promotes eco-friendly practices to reduce GHG emissions.

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

At the Company's corporate offices, the primary categories of waste generated are Municipal solid waste, Paper, Plastic, and Food waste/Wet waste. These are disposed of through municipal corporations, in line with regulations.

| Parameter | FY 2023-24 | FY 2022-23 |
|---|------------|------------|
| Total Waste generated (in metric tonnes) | | |
| Plastic waste (A) | Nil | Nil |
| E-waste (B) | 48.62 | 16.21 |
| Bio-medical waste (C) | NA | NA |
| Construction and demolition waste (D) | Nil | Nil |
| Battery waste (E) | 24.58 | 6.99 |
| Radioactive waste (F) | NA | NA |
| Other Hazardous waste. Please specify, if any. (G) | Nil | Nil |
| Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector) | Nil | Nil |
| Total (A+B + C + D + E + F + G+ H) | 73.20 | 23.20 |
| Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) | 0.01 | 0.004 |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) (MT/million USD) | 0.27 | 0.08 |
| Waste intensity in terms of physical output | - | - |
| Waste intensity (optional) – the relevant metric may be selected by the entity | - | - |

| Parameter | FY 2023-24 | FY 2022-23 |
|--|--------------|--------------|
| For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes) | | |
| Category of waste (E-Waste) | | |
| (i) Recycled | 73.20 | 23.20 |
| (ii) Re-used | Nil | Nil |
| (iii) Other recovery operations | Nil | Nil |
| Total | 73.20 | 23.20 |
| For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes) | | |
| Category of waste (E-Waste) | | |
| (i) Incineration | Nil | Nil |
| (ii) Landfilling | Nil | Nil |
| (iii) Other disposal operations | Nil | Nil |
| Total | Nil | Nil |

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

No

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

The Company's services do not involve the use of hazardous or toxic chemicals.

11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format.

| S. No. | Location of operations/offices | Type of operations | Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any. |
|--------|--------------------------------|--------------------|---|
| | | | No offices are present in ecologically sensitive areas. |

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

| Name and brief details of project | EIA Notification No. | Date | Whether conducted by independent external agency (Yes / No) | Results communicated in public domain (Yes / No) | Relevant Web link |
|-----------------------------------|----------------------|------|---|--|-------------------|
| Not Applicable | | | | | |

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

| S. No. | Specify the law / regulation / guidelines which was not complied with | Provide details of the non-compliance | Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts | Corrective action taken, if any |
|---|---|---------------------------------------|---|---------------------------------|
| Hathway has been compliant with all laws and regulations, thus, there was no imposition of any fines, penalties, or any action against the Company. | | | | |

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

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

None of our operations are in water stressed areas.

- (i) Name of the area – Not Applicable
- (ii) Nature of operations – None
- (iii) Water withdrawal, consumption and discharge in the following format:

| Parameter | FY 2023-24 | FY 2022-23 |
|---|------------|----------------|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | | |
| (ii) Groundwater | | |
| (iii) Third party water | | |
| (iv) Seawater / desalinated water | | |
| (v) Others | | Not Applicable |
| Total volume of water withdrawal (in kilolitres) | | |
| Total volume of water consumption (in kilolitres) | | |
| Water intensity per rupee of turnover (Water consumed / turnover) | | |
| Water intensity (optional) – the relevant metric may be selected by the entity | | |
| Water discharge by destination and level of treatment (in kilolitres) | | |
| (i) Into Surface water | | |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| (ii) Into Groundwater | | |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| (iii) Into Seawater | | |
| - No treatment | | |
| - With treatment – please specify level of treatment | | Not Applicable |
| (iv) Sent to third-parties | | |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| (v) Others | | |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| Total water discharged (in kilolitres) | | |

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

No

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

| Parameter | Unit | FY2023-24 | FY 2022-23 |
|--|------|-----------|------------|
| Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | | | |
| Total Scope 3 emissions per rupee of turnover | | | |
| Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity | | | |

The Company currently does not record data for the indicator. It is working towards building systems and procedures for recording and reporting on the same.

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

No

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

Not Applicable.

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

| Sr. No | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along-with summary) | Outcome of the initiative |
|--|-----------------------|--|---------------------------|
| No such initiatives are taken in FY 2023-24. | | | |

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

The Company has implemented a comprehensive business continuity and disaster management plan aimed at swiftly and seamlessly resuming business operations in the event of a man-made or natural disaster. A dedicated Business Continuity Planning Committee comprising representatives from the Information Technology (IT) and the Technical Team, along with Senior Management Personnel, is responsible for analysing, planning, and executing strategic moves to safeguard operations and minimise the impact of disruptions on the business. The IT and Technical Team regularly test and update the business continuity and disaster management plan to adapt to changing external dynamics.

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

Nil

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

Nil

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

As a responsible business, the Company leads with ethics at all times and provides timely and adequate information to the public and regulatory bodies. The Company’s interactions with relevant authorities are based on the principles of integrity, transparency, and balancing the interests of diverse stakeholders. It believes in responsible engagement and authorises and trains only qualified officials to interact with trade chambers and industry associations that influence policymaking. The Company’s public policy positions align with its sustainability and corporate citizenship objectives. It actively participates in representing its opinions and concerns to regulatory bodies to drive positive change and promote development for everyone.



ESSENTIAL INDICATORS

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

2

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

| S. no | Name of the trade and industry chambers/ associations | Reach of trade and industry chambers/ associations (State/National) |
|-------|---|---|
| 1 | Internet Service Providers Association of India (ISPAI) | National |
| 2 | All India Digital Cable Federation | National |

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

| Name of Authority | Brief of the case | Corrective action taken |
|---|-------------------|-------------------------|
| The Company does not engage in Anti-Competitive activities. Thus, no corrective actions were necessary. | | |

LEADERSHIP INDICATORS

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

| S. no | Public policy advocated | Method resort for such advocacy | Whether the information is available in public domain? (Yes/No) | Frequency of review by board (Annually/ Half yearly/ Quarterly/ Other-please specify) | Web Link, if available |
|-------|---|--|---|---|---|
| 1. | TRAI Consultation Paper on Definition of International Traffic | | | | https://www.trai.gov.in/sites/default/files/Withdrawal_letter_of_ISPAI_18072023.pdf |
| 2. | Consultation Paper on Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services | Giving opinion comment, views on the consultation papers | Yes | Annually | https://www.trai.gov.in/sites/default/files/Internet_Service_Providers_Association_India_05092023.pdf |
| 3. | Consultation Paper on Review of Regulatory Framework for Broadcasting and Cable services | | | | https://www.trai.gov.in/sites/default/files/ISPAI_12102023.pdf |
| 4. | Consultation Paper on Auction of Frequency Spectrum in 37-37.5 GHz, 37.5-40 GHz, and 42.5-43.5 GHz bands Identified for IMT | | | | https://www.trai.gov.in/sites/default/files/ISPAI_27052024.pdf |

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development.

The Company’s goal is to promote equitable and sustainable community development, with a significant emphasis on inclusivity. It aims to foster a culture that integrates inclusive values and Corporate Social Responsibility (CSR) goals with its business objectives. Its unwavering belief in the philosophy of compassionate care drives the Company’s commitment to act on the principles of generosity and compassion to promote equitable development for all. The Company is dedicated to creating a society that serves everyone, and to that end, it pursues initiatives focused on quality healthcare management, environmental preservation, and social awareness.



ESSENTIAL INDICATORS

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

| Name of the project | Brief details of the project | SIA Notification No. | Date of Notification | Whether conducted by independent external agency? (Yes/No) | Results communicated in public domain (Yes / No) | Relevant Web link |
|---|------------------------------|----------------------|----------------------|--|--|-------------------|
| Not Applicable for the services provided. | | | | | | |

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

| S. No. | Name of the project for which R&R is going on | State | District | Total No. of Project Affected Families (PAFs) | No. of PAFs covered by R&R | % of PAFs covered by R&R |
|-----------------------------|---|-------|----------|---|----------------------------|--------------------------|
| No Project was carried out. | | | | | | |

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

The Company engages with its communities through CSR activities, which provides ample opportunities to listen to and address the needs of the members.

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 producers | 62% | 46% |
| Directly from within India | 96% | 95% |

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 | 0.04% | 0.01% |
| Semi urban | 0.01% | 0% |
| Urban | 14.95% | 14.83% |
| Metropolitan | 85.00% | 85.16% |

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

LEADERSHIP INDICATORS

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

| Details of negative social impact identified | Corrective action taken |
|--|-------------------------|
| | Not Applicable |

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

| S. No. | State | Aspirational District | Amount Spent in INR |
|--------|-------|-----------------------|---|
| | | | The Company has not undertaken CSR projects in designated aspirational districts which have been identified by the government bodies. |

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

No. The Company does not have a preferential procurement policy that gives importance to purchasing from suppliers who belong to marginalised or vulnerable groups.

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

Not Applicable

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

Not Applicable

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

| S. No. | Intellectual Property based on traditional knowledge | Owned/ Acquired (Yes/No) | Benefit shared (Yes/No) | Basis of calculating of benefits shared |
|--------|--|--------------------------|-------------------------|---|
| | | | | The Company does not have any registered Intellectual Property. |

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

| Name of authority | Brief of case | Corrective action taken |
|-------------------|---------------|-------------------------|
| | | Not Applicable |

6. Details of beneficiaries of CSR Projects.

| S. no | CSR Project | No of persons benefited from CSR Projects | % of beneficiaries from vulnerable and marginalized group |
|-------|-----------------------------------|---|---|
| 1 | Sustainable Livelihoods Programme | 12958 | 100% |

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

The rise of internet access and rapidly evolving technology has significantly transformed people's lives. The Company is committed to building long-lasting relationships with its customers through ethical and sensitive engagements that comply with regulations. The Company adopts cutting-edge digital solutions to bring the latest innovations at affordable prices to improve ease of use and experience for customers. Hathway continuously strives to improve its business processes to meet the evolving needs of its customers, adding value and exceeding their expectations.

**ESSENTIAL INDICATORS**

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

The Company has established a two-tier institutionalised grievance mechanism in compliance with "Telecom Consumer Complaint Redressal Regulation 2012" issued by the TRAI on 5th January 2012 and amended thereto ("Regulations").

Customers can register their complaint through any of the below media:

- AI Chatbot (Chat with Diva)
- 24X7 Toll-Free Customer Care Number
- Email to Customer Care
- Mobile App
- WhatsApp
- Self-Care Portal (Web Portal)
- Written Complaint

The Company has introduced the AI chatbot Diva, which assists existing and new customers with queries, registering complaints and connecting with customer service executives.

On receipt of a complaint or service request from a consumer, the following activities are undertaken:

- A unique Docket Number / Complaint Reference Number is provided to the customer for all the complaints and is sent to this Registered Mobile Number via SMS.
- Redressal of the complaints and service requests is taken in accordance with the time frame as specified under the Quality-of-Service regulations issued by the TRAI.
- On completion of action on a complaint, details of action taken on the complaint are communicated to the customer through SMS on their Registered Mobile Number.
- Where a consumer is not happy with the complaint that has been given by the Complaint Centre, or their complaint remains unaddressed or no intimation of redressal of the complaint is received within the period specified above, such a consumer may appeal with the Appellate Authority for redressal of the complaint.

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

| Business | As a percentage to total turnover |
|---|-----------------------------------|
| Environment and Social parameters relevant to the product | Not Applicable |
| Safe and responsible usage | 100%* |
| Recycling and/or safe disposal | Not Applicable |

*Basic instruction manuals with safety details are provided with routers and modems.

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

| Category | FY 2023-24 | | | FY 2022-23 | | |
|--------------------------------|---|---------------------------------------|-----------|--------------------------|---------------------------------------|-----------|
| | Received during the year | Pending resolution at the end of year | Remarks | Received during the year | Pending resolution at the end of year | Remarks |
| Data privacy | 0 | 0 | | 0 | 0 | |
| Advertising | 0 | 0 | No Remark | 0 | 0 | No Remark |
| Cyber-security | 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. | | | | | |
| Restrictive Trade Practices | 0 | 0 | | 0 | 0 | |
| Unfair Trade Practices | 0 | 0 | No Remark | 0 | 0 | No Remark |
| Others | 0 | 0 | | 0 | 0 | |

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

| Category | Number | Reason for recall |
|-------------------|--------|----------------------------------|
| Voluntary recalls | | |
| Forced recalls | | No such instances were recorded. |

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

Yes, in order to safeguard the confidentiality, integrity, and availability of our information assets, the Company has established a policy that follows the minimum requirements for Information Security. Adherence to these policies enables the Company to safeguard its sensitive data, adhere to legal and regulatory mandates, and foster customer trust.

To ensure the effective implementation of the policy, the Company has set up a committee to create a framework to promote the adoption of best practices to ensure data privacy throughout the organisation. The Committee emphasises the principle for data security to be treated as a priority by both internal and external stakeholders.

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

- Educational campaigns are conducted for customers to inform them about Cyber Security Threats and Privacy Concerns, along with the necessary measures to safeguard themselves.
- The Company offers Do-It-Yourself (DIY) videos to customers, explaining the setup of various data and network privacy measures. These videos aim to safeguard customers from potential data theft or harm, ensuring the security of their network and data.

7. Provide the following information relating to data breaches:

- Number of instances of data breaches**
No such incidents were recorded.
- Percentage of data breaches involving personally identifiable information of customer**
Not Applicable
- 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).**

The Company has created many platforms to help customers access information about its products and services, including website, mobile application, or by calling its customer care centre's toll-free number.

Website: www.hathway.com

APP: Hathway Broadband APP available on Android and iOS platform

Call centre: 24X7, Toll-Free Number (1800221119).

Consumer Charter: <https://www.hathway.com/Consumer-Charter-Ver-8.0.pdf>

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

The Company places is committed to meeting and satisfying customer needs to maintain competitiveness and foster innovation. This commitment drives the Company to continuously enhance its value propositions for customers. Ensuring that customers are well-informed about its products and services, including their safe and responsible usage, is a top priority for the Company.

To achieve this, the Company takes the following steps:

1. The Company periodically sends SMS and app notifications to its customers to inform customers about the need to disconnect their Hathway devices during heavy lightning and rains in the area. This helps its customers protect their equipment and avoid any potential hazards.
2. The Company has published the Telecom Consumers Charter on its website in compliance with TRAI's clause 17 of the Telecom Consumers Complaint Redressal Regulation, 2012. The Charter serves to inform its customers of their rights and obligations, as well as the quality standards specified by the Authority. Additionally, it provides information on the options available to customers for resolving disputes.

By following these practices, the Company aims to provide the highest level of service to its customers and maintain their trust and loyalty.

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

The Company's mechanisms to inform customers of risks of disruption or discontinuation of essential services are listed below:

1. The Company pushes mobile application notifications through the Hathway Broadband App to customers regarding any disruptions/discontinuation of Services.
 2. Mass notifications are transmitted via SMS to the customer's registered number in the event of any outage or disruption of services in their area.
 3. Automated Voice Messages are deployed on the Call Centre IVR informing customers of outages in their area.
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

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 conducts customer satisfaction surveys after resolving each complaint. These surveys are distributed to registered users via email, and SMS invitations. The feedback, queries, and complaints received from respondents are forwarded to the respective Customer Service teams of all operational locations for appropriate action.