



August 07, 2024

BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400001

The National Stock Exchange of India Limited
Exchange Plaza, C-1, Block – G, Bandra Kurla
Complex, Bandra (E), Mumbai - 400051

Ref.: Indus Towers Limited (534816/ INDUSTOWER)

Sub.: Annual General Meeting (AGM) – Notice of 18th AGM and Integrated Report for the Financial Year ended on March 31, 2024

Dear Sir/ Madam,

Pursuant to the provisions of Regulation 30, 44 and other applicable provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we wish to inform you that:

- The 18th (eighteenth) AGM of the Company will be held on Thursday, August 29, 2024, at 03:30 p.m. (IST) through Video Conferencing/ Other Audio-Visual Means, in accordance with relevant circulars issued by Ministry of Corporate Affairs ('MCA') as well as Securities and Exchange Board of India ('SEBI'). Notice of the AGM along with the Integrated Report, Business Responsibility and Sustainability Report ('BRSR') & Financial Statements 2023-24 is enclosed and is also being sent to all the members of the Company whose email addresses are registered with the Company or Depository Participant(s).
- The Company is offering e-voting facility to its members to transact the businesses set forth in the Notice. The facility to exercise vote by electronic means (i.e. remote e-voting/ e-voting at the AGM) on all resolutions as set out in the Notice will be provided to the members holding shares either in physical or electronic form as on the cut-off date i.e. Thursday, August 22, 2024. The remote e-voting will commence on Monday, August 26, 2024 at 09:00 a.m. (IST) and will end on Wednesday, August 28, 2024 at 05:00 p.m. (IST) (both days inclusive).

The Notice and Integrated Report are also available on the website of the Company at www.industowers.com.

This is for your information and records.

Thanking you,

Yours faithfully,


For **Indus Towers Limited**

Samridhi Rodhe
Company Secretary & Compliance Officer

Encl.: As above

Indus Towers Limited

Business Responsibility & Sustainability Report


**SECTION A
GENERAL
DISCLOSURES**


**SECTION B
MANAGEMENT AND
PROCESS DISCLOSURES**


**SECTION C
PRINCIPLE-WISE
PERFORMANCE DISCLOSURES**

Principle 1		Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable
Principle 2		Businesses should provide goods and services in a manner that is sustainable and safe
Principle 3		Businesses should respect and promote the well-being of all employees, including those in their value chains
Principle 4		Businesses should respect the interests of and be responsive to all its stakeholders
Principle 5		Businesses should respect and promote human rights
Principle 6		Businesses should respect and make efforts to protect and restore the environment
Principle 7		Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
Principle 8		Businesses should promote inclusive growth and equitable development
Principle 9		Businesses should engage with and provide value to their consumers in a responsible manner

SECTION A - GENERAL DISCLOSURES

1. Details

1. Corporate Identity Number (CIN) of the Listed Entity	L64201HR2006PLC073821
2. Name of the company	Indus Towers Limited
3. Year of incorporation	2006
4. Registered office address	Building No.10, Tower-A, 4 th Floor, DLF Cyber City, Gurugram, 122002
5. Corporate address	Building No.10, Tower-A, 4 th Floor, DLF Cyber City, Gurugram, 122002
6. E-mail	compliance.officer@industowers.com
7. Telephone	+91 124 4296766
8. Website	www.industowers.com
9. Financial year for which reporting is being done	2023-24
10. Name of the Stock Exchange(s) where shares are listed	The National Stock Exchange of India Limited and the BSE Limited
11. Paid-up Capital	₹ 26,949,369,500
12. Name and contact details of the person who may be contacted in case of any queries on the BRSR report	Compliance Officer: Ms. Samridhi Rodhe Email Id: compliance.officer@industowers.com Telephone Number: +91 124 4296766
13. Reporting boundary	Disclosures made in this report are on a standalone basis and pertain only to Indus Towers.
14. Name of assurance provider	Cetizion Verifica Private Limited
15. Type of assurance obtained	<ul style="list-style-type: none"> Reasonable assurance for BRSR Core Limited assurance for other KPI(s) as per the assurance statement.

2. Products/Services

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

Description of main activity	Description of business activity	% of turnover
Telecom Tower Passive Infrastructure	To establish and maintain the assets such as dark fiber, Right of Way, Duct Space & Towers for the purpose to grant on lease/rent/sale basis to the licensees of Telecom Services Licensed under Section 4 of Indian Telegraph Act, 1885 on mutually agreed terms and conditions.	100%

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

S. No.	Product/services	NIC Code	% of total turnover contributed
1.	Activities of providing Telecom Tower Infrastructure Sharing to enable telecommunication services provided by TSPs.	612	100%

3. Operations

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

Location	Number of plants	Number of offices	Total
National	Indus Towers is a passive infrastructure service provider for telecom operators Pan India.	66	66
International	Not applicable, at present the Company is serving only the national market		

19. Markets served -

a) Number of locations -

Locations	Number
National (No. of states)	36* (28 States & 8 UT's)
International (No. of countries)	Not applicable

*Indus Towers has PAN India locations.

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

At present, the Company is serving only the Indian market.

c) A brief on types of customers

All major telecom operators in India are customers of Indus Towers. These include Bharti Airtel, Vodafone Idea, Reliance Jio and BSNL.

4. Employees

20. Details as at the end of Financial Year -

a) Employees and workers (including differently abled) -

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Employees						
1.	Permanent (D)	3,554	3,135	88.21%	419	11.79%
2.	Other than permanent (E)	-	-	-	-	-
3.	Total employees (D + E)	3,554	3,135	88.21%	419	11.79%
Workers						
4.	Permanent (F)	-	-	-	-	-
5.	Other than permanent (G)	7,905	7,631	96.53%	274	3.47%
6.	Total workers (F + G)	7,905	7,631	96.53%	274	3.47%

Total 7,905 manpower (engaged through third party manpower agreements), has been classified as 'Other Than Permanent Workers'. As these workers are engaged via third party, the necessary records are maintained by the third party. Indus Towers ensures that the aforesaid parties meet the compliances and statutory requirements by conducting regular checks and audits. Accordingly, the data in this report pertains to the 'Permanent Employees' and 'Other Than Permanent Workers' to the extent available with the Company.

b) Differently abled employees and workers -

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Differently abled employees						
1.	Permanent (D)	12	12	100%	Nil	Nil
2.	Other than permanent (E)	-	-	-	-	-
3.	Total employees (D + E)	12	12	100%	Nil	Nil
Differently abled Workers						
1.	Permanent (F)	-	-	-	-	-
2.	Other than permanent (G)	-	-	-	-	-
3.	Total workers (F + G)	-	-	-	-	-

21. Participation/inclusion/representation of women -

	Total (A)	No. and % of females	
		No. (B)	% (B / A)
Board of Directors	14	2	14%
Key Management Personnel*	2	1	50%

*excluding the Board members

22. Turnover rate for permanent employees and workers -

	FY 2023-24			FY 2022-23			FY 2021-22		
	Male (A)	Female (B)	Total (C)	Male (A)	Female (B)	Total (C)	Male (A)	Female (B)	Total (C)
Permanent employees	18.64%	21.15%	18.87%	19.10%	27.60%	19.60%	19%	34.80%	20%
Permanent workers	Not applicable								

5. Holding, subsidiary and associate companies (including joint ventures)

23. Names of holding / subsidiary / associate companies / joint ventures -

S. No.	Name	Holdings/ subsidiary/ associate/ joint venture	% of shares held by listed entity	Do the entities indicated in the table participate in the business responsibility initiatives of the listed entity?
1.	Smartx Services Limited	Subsidiary	100%	No

6. CSR Details

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

(ii) Turnover (in ₹ Millions) - 286,006

(iii) Net worth (in ₹ Millions) - 245,436

7. Transparency and Disclosure Compliances

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

Stakeholder group from whom the complaint is received	Grievance Redressal Mechanism in Place (Yes/No)	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	Nil	Nil	-	Nil	Nil	-
Investors (other than shareholders)	Yes	Nil	Nil	-	Nil	Nil	-
Shareholders	Yes	Nil	Nil	-	2	Nil	-
Employees and workers	Yes	106	10	-	114	10	-
Customers	Yes	Nil	Nil	-	Nil	Nil	-
Value chain partners	Yes	24	1	-	12	1	-
Landlords	Yes	10	Nil	-	11	Nil	-
Others	-	136	5	-	90	23	-
Consumer complaints**	-	3	15	-	5	22	-
Total		279	31	-	234	56	-

*Number of complaints pending resolution at close of the year are total complaints pending whether filed during the year and in any previous Financial Years.

**15 consumer cases are pending at the end of the year. Pertinently, none of these are maintainable as the complainants do not fall within the definition of consumers.

Indus provides an avenue for every stakeholder group to voice their concerns, details of which are as under:

1. **Communities & NGOs:** Under CSR programs, the NGO partners address the grievances of the community as and when it arises. In addition to this they have regular interaction with the community to bring in more awareness about the program. The Company representatives are in regular touch with the NGO partners and keep themselves apprised of any key concern of the community.
2. **Investors and Shareholders:** To report any concerns or grievances, Investors and shareholders can reach out to the Compliance Officer through a dedicated email, compliance.officer@industowers.com. For financial queries, the Investors can also reach to the Investor Relation Head at ir@industowers.com.
3. **Employees and Workers:** Indus has adopted an Ombudsman Policy/ Whistle Blower Policy that provides a mechanism for employees and contractual workers to report any concerns or grievances. The policy aims to ensure that complainants can raise their concerns in full confidence, without any fear of retaliation or victimisation and allows for anonymous reporting of complaints. Please refer the weblink - [Our Corporate Governance | Indus Towers and Email-ombudsman@industowers.com](#). Indus also has a policy on Prevention of Sexual Harassment (POSH), and any such incidents can be reported to the Internal Complaint Committee as per the process defined in the policy.
4. **Customers:** There are several connect forums with customers on a daily, weekly & monthly basis to

receive and respond to the needs, queries and take feedback from the customers. Some of these connects are enumerated below:

- Corporate & circle leadership governance meetings, Customer query handling during BCP situations, special projects, or any other exigencies and Energy team meetings to resolve diesel, electricity consumption and availability related issues.
5. **Value Chain Partners:** Ombudsman Policy/ Whistle Blower Policy also provides a mechanism for value chain partners to report any concerns or grievances. Partners can raise their grievances via call/e-mail/letter/other messaging platforms. Indus has also put in place a special grievance mechanism called 'Payment Concern Room' (PCR) for any payment related concerns from the Business Partners. Please refer the weblink - [Our Corporate Governance | Indus Towers and Email-ombudsman@industowers.com](#).
 6. **Landlords:** The Company has instituted a dedicated Help Desk called i-Care. All the queries and complaints raised by the existing and prospective landlords are now effectively handled by the i-Care helpdesk. Indus has established a state-of-the-art call center named: iCare. Considering India is a land of various languages and the ease of resolving queries from landowners is our topmost priority, there is an inbuilt system in the call center that enables the landowners to communicate with the call center in their preferred language. Refer the weblink <https://www.industowers.com/landlords/?var=1659008253> and Email - icare@industowers.com.

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

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

Indus Towers conducted its comprehensive materiality assessment in FY 2021-22 to identify the ESG related material topics. The main goal in determining the materiality is to understand the issues that are relevant and will impact Indus's stakeholders and operations over the short, medium and long term. This understanding, in turn, makes ESG strategy and action plan more aligned with stakeholder priorities, and robust in terms of creating impact and navigating risks.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of Risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	GHG Emissions	Opportunity and risk	<p>Opportunity Development of alternative energy solutions</p> <p>Risk Operations of Indus Towers are energy intensive. Energy demand is primarily met through grid electricity and diesel which cause significant GHG emissions. Increase in business operations may further increase the GHG Emissions. Rising GHG emissions could result in climate related risks which may impact our operations due to extreme weather events or supply shortages caused by natural calamity.</p>	Our processes are aimed at making our sites diesel free and using electricity from renewable energy sources. We are installing solar sites, deploying energy storage solutions and exploring greener technologies such as aluminum-air based clean energy generation to decarbonize our business.	<p>Positive</p> <ul style="list-style-type: none"> Investments in green energy technologies and solutions are increasing keeping in view environment and sustainability concerns, which is cost effective in long run. <p>Negative</p> <ul style="list-style-type: none"> Given the Government's target to achieve net zero by reducing GHG emissions, we are taking initiatives to reduce dependency on fossil fuels. This entails additional investments.
2	People Practices	Opportunity and risk	<p>Opportunities</p> <ul style="list-style-type: none"> Well established people practices benefit in high productivity Positive branding to help attract and retain talent Preferred partner by Contractors Highly motivated and skilled employees will enable innovation, improved service delivery, and enhance customer satisfaction <p>Risks of poor people practices:</p> <ul style="list-style-type: none"> High attrition Inability to deliver quality services Reputational risk over Culture Legal issues over non-compliance to labour laws 	We have a structured framework to drive our people's practices for the benefit of our employees. The framework offers training and competency development programs, employee engagement and well-being, rewards and performance, and promotes diversity and inclusion. Refer Human Capital for details of people practices followed at Indus Towers.	<p>Positive</p> <ul style="list-style-type: none"> High productivity and people interest in the Company results in cost efficient operations <p>Negatives</p> <ul style="list-style-type: none"> Non-compliance with labour laws and regulations may lead to monetary penalties. Loss of our valued high performing employees or inability to attract and retain employees may affect the Company's business and prospects. Higher attrition or poor perception of the Company image may inflate the cost of hiring people.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of Risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3	Health and Safety	Risk	<p>Risks</p> <ul style="list-style-type: none"> Ill health caused by occupational diseases or accidents at site can cause disruption to operations and result in poor individual and organizational performance. Technicians working in the field are exposed to occupational safety and health risks Negative impact on brand reputation 	<ul style="list-style-type: none"> Training in best practices is provided to the technician. We conduct safety and wellbeing workshops. 100% coverage of health insurance and term insurance is ensured for all manpower. 	<p>Negatives</p> <ul style="list-style-type: none"> Poor health of people can result in long-term financial costs for the business. Lapses in health and safety of employees and contractors may result in levy of penalty from the regulator and increase of legal costs from suits filed against the company by the aggrieved parties. To avoid accidents, we may have to modify design of our products which may result in additional investment or increase in cost.
4	Waste Management	Opportunity and Risk	<p>Opportunity</p> <ul style="list-style-type: none"> Reduction in waste generation through efficient consumption of resources <p>Risk</p> <ul style="list-style-type: none"> Levy of penalty if the prescribed standards and regulations are not met 	<p>We ensure recovery of both hazardous and non-hazardous wastes from the sites.</p> <p>Refer waste management practices in Natural Capital at Indus for more details.</p>	<p>Positive</p> <ul style="list-style-type: none"> Innovative solutions to reduce waste generation and adoption of the 3R principle of waste management (Reduce, Reuse and Recycle) may lead to optimized use of resources, hence resulting in cost efficiency. <p>Negative</p> <ul style="list-style-type: none"> Any mishandling of hazardous waste may lead to a threat to people's health or non-compliance. The aforesaid outcome may have negative financial implication.

SECTION B - MANAGEMENT AND PROCESS DISCLOSURES

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

S. No.	Principle Description
P1	Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable
P2	Businesses should provide goods and services in a manner that is sustainable and safe
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains
P4	Businesses should respect the interests of and be responsive to all their stakeholders
P5	Businesses should respect and promote human rights
P6	Businesses should respect and make efforts to protect and restore the environment
P7	Businesses when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
P8	Businesses should promote inclusive growth and equitable development
P9	Businesses should engage with and provide value to their consumers in a responsible manner

Disclosure questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	✓	✓	✓	✓	✓	✓	✓	✓	✓
b. Has the policy been approved by the Board? (Yes/No)	✓	✓	✓	✓	✓	✓	✓	✓	✓
c. Web-link of the policies, if available.	Refer to Note 1								
2. Whether the entity has translated the policy into procedures. (Yes / No)	✓	✓	✓	✓	✓	✓	✓	✓	✓
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes. The Company's Code of Conduct largely imbibes the above-mentioned principles, and the Company expects its value chain partners to adhere to the same in all their dealings.								
Name of the national and international codes/certifications/labels/ standards (e.g. Forest stewardship council, Fairtrade, Rainforest System alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) mapped to each principle.									
5. Specific commitments, goals, and targets set by the entity	ISO 27001:2022 - Information Security Management standards (e.g. Forest stewardship council, Fairtrade, Rainforest System alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) mapped to each principle. ISO 27017:2015 - Information Security Controls for Cloud Services								
6. Performance of the entity against the specific commitments, goals, and targets along with reasons in case the same are not met.	Refer to Note 2								
Governance, leadership, and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements	Refer to page 36 of this Integrated Report								
8. Details of the highest authority responsible for implementation and oversight of the business responsibility policy/policies	The ESG committee of the Board monitors the ESG priorities of the Company.								
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.	The Committee comprises of following members as at March 31, 2024: 1) Ms. Sonu Bhasin, Independent Director-Chairperson 2) Mr. Prachur Sah, MD & CEO- Member 3) Mr. Randeep Sekhon, Non-executive Director-Member 4) Mr. Thomas Reisten, Non-executive Director-Member								

10. Details of review of NGRBCs by the company -

Subject for review	Indicate whether the review was undertaken by Director/committee of the board/ any other committee									Frequency (Annually/ half-yearly/ quarterly/ any other - please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Performance against above policies and follow up action	✓	✓	✓	✓	✓	✓	✓	✓	✓	The policies are reviewed annually and as and when required							
Compliance with statutory requirements of relevance to the principles, and, the rectification of any non-compliances	✓	✓	✓	✓	✓	✓	✓	✓	✓	The compliance is monitored quarterly								
11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency [#]										No, please refer the footnote								

*As per Company's practice, all the policies are approved by the concerned authority depending upon the nature of policy. The concerned authority is the Board/ Board Committees and in some cases delegation to either MD & CEO/Functional Head etc.

No external evaluation was undertaken, however, the processes and compliances may be subject to scrutiny by internal auditors and regulatory compliances, as applicable. Policies are periodically evaluated and updated by various department heads, business heads and approved by the management and/or board.

Note 1:

The policies have been developed based on best practices or as per regulatory requirements. Policies may include a combination of internal policies of the Company which are accessible to all internal stakeholders and policies placed on the Company's website at <https://www.industowers.com/>.

P1- Anti Bribery and Anti-Corruption Policy, Code of Conduct, Whistle Blower Policy, Code of Conduct for Business Partners.

P2- Code of Conduct, Code of Conduct for Business Partners and Sustainable Procurement Policy

P3- Human Right Policy, Environment Health and Safety Policy Whistle Blower Policy, Code of Conduct, and other People policies to support employee well-being and protection of human rights

P4- Code of Conduct and Whistle Blower Policy

P5- Human Right Policy, Code of Conduct, Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace, Whistle Blower Policy

P6- Environment Health and safety Policy, Code of Conduct, Code of Conduct for Business Partners and Sustainable Procurement Policy

P7- Code of Conduct

P8- Corporate Social Responsibility Policy, Code of Conduct

P9 -Code of Conduct and Information Security Policy

Note 2:

During the Financial Year 2022, the Company has undertaken a comprehensive materiality assessment and stakeholder engagement exercise to identify its environmental, social and governance (ESG) priorities. Insights gathered through stakeholder engagement were analysed to develop the materiality matrix and arrive at the final list of ESG focus areas. The result of this assessment was considered for defining the ESG targets of the Company.

The Company has been taking significant steps to integrate ESG priorities in its operations.

The Company has re-evaluated and strengthened its long-term ESG targets for prioritized material topics as follows:

S. No.	Metric	Target	Mapped NGRBC Principles	FY 2024 update
Environment				
A.	GHG Emissions	Net-zero greenhouse gas emissions by 2050 in line with climate science with the Science Based Targets initiative ("SBTi")	P2 & P6	Total GHG emissions for FY 24 has been reported in P6
		Increasing share of non-DG sites to ~30% by Financial Year 2025	P2 & P6	Alternate solutions are being looked at to reduce the dependency on diesel
B.	Renewable Energy	Portfolio of more than 25,000 solar sites by Financial Year 2025 ¹	P2 & P6	14K+ Solar Sites deployed in FY 2024
	Green Energy Open Access	Increase our share of renewable energy under Green Energy Open Access	P2 & P6	Advocacy in progress to steer GEOA
C.	Waste Management	Ensuring 100% of hazardous battery waste and e-waste generated in our operations is reused, recycled, or safely treated for recovery each year	P2 & P6	100% of hazardous battery waste and e-waste generated in our operations is sold to authorised recyclers.
Social				
D.	Diversity & Inclusion	Increasing share of women employees to 14% by Financial Year 2025. Aspiring to increase it 5x over medium to long term ²	P3 & P5	Women diversity has increased to 11.8% in FY 2023-24
E.	Health & Safety	Compared to Financial Year 2023, 50% reduction in Loss Time Injury by Financial Year 2025	P3	In FY 2023-24 we have reduced out LTI incidents by 24%
		ISO 45001 certification by Financial Year 2025		We have identified relevant safety clauses and are working on improvement of the Safety Management system in line with ISO-45001
F.	People Practices	Human Rights training to all employees by Financial Year 2024	P3 & P5	Human Rights Policy was launched for all employees and partners. Simultaneously, human rights training module was also launched. 96.26% of employees were trained in Human Rights.
		Human rights training to value chain partners in FY 2025		
G.	Community Development	Positively touch 150 Mn lives in medium to long term	P4 & P8	Positively touched 14.34 million lives through various CSR interventions in FY 2024
Governance				
H.	Stakeholder Engagement	Periodic materiality assessment to prioritize ESG focus areas	P4	Materiality Assessment is planned for FY25
I.	Sustainable Supply Chain	ESG compliance by suppliers and partners	P2, P3, P4 & P5	The Sustainable Sourcing Policy was launched for value chain partners and awareness programme was conducted. Going forward, suppliers and partners will be evaluated on the basis of compliance of the policy.

S. No.	Metric	Target	Mapped NGRBC Principles	FY 2024 update	
J.	Business Continuity Plan	Extend Business Continuity Plan to critical functions in addition to Operations and IT	P6 & P9	Business Continuity Plan concluded additionally for critical functions like Finance and Supply Chain Management (SCM)	
K.	Climate risk assessment	Undertake the assessment of climate-related risks and opportunities and make disclosures by Financial Year 2025	P2 & P6	Initiatives undertaken to address climate-related risks and opportunities identified towards climate adaptation	
L.	Building culture of sustainability	ESG Advance level training to all employees by Financial Year 2024	P2 & P3	ESG Advance level training launched and delivered at all circles in 'Train The Trainer' module.	

Notes:

- Target for FY25 has been revised from 5,000 to 25,000 sites considering performance for FY24
- Target for FY25 has been revised from 10% to 14% considering performance for FY24

Work in Progress

On Track

12. If answer to question (1) above is “No” i.e., not all principles are covered by a policy, reasons to be stated -

The answer to Q1 is Yes. All the principles are covered by a policy. Hence this question is Not applicable to Indus Towers

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
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For Indus, value creation and stakeholder trust are built on its integrity, transparency, business conduct and upholding the highest ethical standards. Indus believes that a strong foundation of ethics is necessary to sustain economic value. With its legacy of fair, transparent and ethical governance practices, the Company's Code of Conduct reinforces its commitment to operate with the highest degree of integrity. It lays a framework for expected standards of ethical conduct and behaviour. It outlines principles against discrimination, anti-competitive practices, insider trading and prohibits bribes. The Code is applicable to employees, suppliers, contractors and value chain partners as well. Employees are also required to undergo an annual certification pursuant to the Code of Conduct to acknowledge their understanding of the same and to commit to inculcate the principles defined in it.

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes*
Board of directors	4	All the principles laid down in BRSR are covered in induction programme for orientation and training of Directors and in the Code of Conduct of the Company.	100%
Key managerial personnel**	5	1. Anti Bribery Anti-Corruption Refresher FY 24 2. Data Leakage Prevention Refresher FY 24 3. Indus Code of Conduct Refresher FY 24 4. Information Security Management System Refresher FY 24 5. Prevention of sexual harassment Refresher FY 24	1. Anti Bribery Anti-Corruption Refresher FY 24 - 100% 2. Data Leakage Prevention Refresher FY 24- 100% 3. Indus Code of Conduct Refresher FY 24 - 100% 4. Information Security Management System Refresher FY 24 - 100% 5. Prevention of sexual harassment Refresher FY 24 - 100%
Employees other than BoD and KMPs	5	1. Anti-Bribery & Anti-Corruption FY 24 2. Indus Code of Conduct FY 24 3. Information Security Management System FY 24 4. Prevention of Sexual Harassment (POSH) FY 24 5. Data Leakage Prevention FY 24	1. Anti-Bribery & Anti-Corruption FY 24 - 98.70% 2. Indus Code of Conduct FY 24 - 98.40% 3. Information Security Management System FY 24 -98.10% 4. Prevention of Sexual Harassment (POSH) FY 24 - 98.20% 5. Data Leakage Prevention FY 24 - 98.40%
Workers***	Nil		

* % of persons in respective category covered, means person who have attended the respective trainings.

** including MD & CEO of the Company.

*** In FY24, we ran a pilot to engage the workers to complete the trainings and ensure smooth functioning of uKnowvva. Post a successful pilot, we will be actively engaging all workers in FY25.

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 FY 24. (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

There were no such fines/penalties/punishment/ award/ compounding fees/ settlement amount paid by the directors and KMPs of the Company during the year.

Further, the material events eligible for disclosures on the basis of materiality as specified in the Regulation 30 of the SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 were disclosed to the stock exchanges during the year appropriately and are also available on the website at <https://www.industowers.com/investor/stock-exchange-submission/>.

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

Not applicable

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

Yes, Indus has a well-defined anti-bribery and anti-corruption policy. Additionally, anti-bribery and anti-corruption provisions also form part of our Code of Conduct. Indus adheres to the highest level of ethical business practices and has zero tolerance towards any form of bribery and corruption as articulated in the Policy and the Code. The Code is applicable to all employees, the Board of Directors, suppliers, and other business partners of the company. The ABAC Policy prohibits anyone acting for or on behalf of the Company or representing the Company, whether directly or indirectly, from making or receiving an 'Improper Payment.'

Whistleblower Policy, to report any concerns associated with unethical business practices, including corruption and bribery.

f) Indus has a formal procedure to investigate and address any complaint on bribery/ corruption and takes suitable disciplinary action. Such misconduct is periodically reported to the Audit Committee.

The policy is available for all the employees on intranet and the code of conduct, covering the provisions of anti-bribery and anti- corruption, is available on the website of the company at <https://www.industowers.com/>.

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

Nil

6. Details of complaints with regard to conflict of interest -

There was no complaint with regard to conflict of interest.

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

Not applicable as there was no such case.

Brief highlights of the Policy:

- a) Employees and associates are not permitted to offer, promise, give, request, accept or authorise bribes in any form either directly or indirectly.
- b) Declaration of interest by employees.
- c) Guidelines on due diligence to be exercised at the time of selecting firms/entities for doing business, in order to avoid risks of bribery and corruption.
- d) Regular training and awareness sessions are made available in relation to the ABAC Policy and the Code.
- e) Indus has provided a whistleblower mechanism to all employees and third parties as per the

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	29	25

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:

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases	a) Purchases from trading houses as % of total purchases	Not applicable	Not applicable
	b) Number of trading houses where purchases are made from		
	c) Purchases from top 10 trading houses as % of total purchases from trading houses		
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		
	c) Sales to top 10 dealers/ distributors as % of total sales to dealers/ distributors		
Share of RPTs in	a) Purchases (Purchases with related parties/Total Purchases)	0.00	0.00
	b) Sales (Sales to related parties/Total Sales)	0.85	0.82
	c) Loans & advances (Loans & advances given to related parties/Total loans & advances)	1.00	1.00
	d) Investments (Investments in related parties/Total Investments made)	0.88	1.00

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
15+	1. E-Safe Trainings 2. STAC, E-STAC, CHCTE, 3. ESG Awareness	39%

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, Indus has put in place stringent procedures and safeguards to avoid any conflicts of interest involving members of the Board and other employees.

The Board and employees of the Company are required to undergo an annual certification on the Code of Conduct of the Company. Code of Conduct covers guidelines related to Conflict of Interest. It provides guidelines for avoiding any conflict of interest, both actual or apparent, and the mechanism to report any such situations that may give rise to a potential conflict.

The Company also has a well-defined policy and process in place to deal with related party transactions. The Policy disallows the concerned or interested Director to participate in any discussion or approve contracts or arrangements with related parties, to avoid potential conflicts of interest. Company ensures that proper reporting, approval, and disclosure processes are in place for all transactions between the Company and related parties.

Principle 2 Businesses should provide goods and services in a manner that is sustainable and safe.

Indus Towers is a leading digital infrastructure Company, offering passive infrastructure services to telecom operators and other wireless services providers across India. The Company constantly aims to ensure safety and optimal resource utilization across the entire life cycle of its services. Indus proactively aims to reduce its ecological footprint across the value chain including its business operations, supply chain and delivery of services, to contribute towards sustainable development. To minimise adverse environmental impact, the Company has undertaken several initiatives across the value chain. This includes initiatives around reduced energy consumption, waste minimisation and innovative solutions to ensure environmental sustainability.

Essential Indicators

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

Indus Towers is conscious of and takes relevant steps to improve its environmental and social impact.

	FY 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
R & D	Nil	Nil	-
Capex	1.87% of total capex for the year.	3.97 % of total capex for the year.	During the year the Company has made capex investment on energy conservation initiatives and initiatives to improve safety measures. The energy efficient solutions enabled the Company to reduce its carbon footprints and the safety measures helped reduce the number of incidents thereby providing a safe workplace to its people.

To read more about the initiatives taken to reduce carbon footprint, please refer to the Natural Capital and for safety practices, the Human Capital Section of the Integrated Report.

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

"Yes, Indus has "Sustainable Procurement Policy" that entails key ESG expectations from partners and talks about consideration of ESG evaluation in sourcing decision. Indus has built sourcing strategy beyond a conventional and traditional value supply chain, for being efficient in cost, quality and delivery time, maintaining integrated strategic objective of ethics, labour rights, safety and green procurement across the supply chain spread across geographies and regional clusters.

Whenever a new partner is onboarded, its facilities, processes are audited that is holistic and also includes ESH metrics. Partners are also being monitored on a regular basis for adherence to policies laid down to ensure responsible sourcing, backed with mandatory annual certification for CoC.

In FY'23, we started the ESG assessment of top partners (supplies); each partner was evaluated on ESG Maturity. Baseline these results/scores, this year, gap analysis was conducted, and improvement plan was formulated for these assessed partners. Subsequently, individual partner workshops were conducted to discuss the key actionable. Also, Indus Towers conducted Partner ESG training and launched an Awareness program to elevate ESG consciousness within key value chain partners. To assess the improvement and impact, ESG re-assessment was done for these partners and the results reflected significant improvement in the maturity scores. Moreover, this year, we also extended the services to partners. Going forward, assessment & enhancement of ESG maturity will be a regular affair."

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

Yes, Indus follows a structured approach to ensure sustainable sourcing. It includes periodic monitoring of business practices followed by our partners in the value chain alongside the governance activities to ensure improvements towards Environmental, Social, and Ethical aspects.

Our monitoring and improvement programs are custom designed to the nature of our engagement with partners. For instance, Supply/Infra partners are onboarded post assessments (that go beyond a traditional approach) duly encompassing the assessment of their plant, processes, and practices incorporated for safety, environment, and compliance management. Post assessment, monitoring and improvement initiatives under the Partner Quality Assurance program empowers them through knowledge sharing training programs.

Since the spread of our business is high on geographical and environmental diversity, we have a mix of national and regional partners engaged in large-scale service operations. Our service partners' onboarding process is inclusive of qualifying conditions assessed by an independent and competent agency under due diligence program for business conduct, compliances, and practices for a pre-engagement period, followed by monitoring, auditing and governance mechanisms throughout their journey with our company.

Periodic Performance assessment and rating programs include safe practices, various contractually defined essentials such as usage of PPE, safe practices, audit, and other consequential management.

A Preventive control is also in place, where gating criteria is conducted annually to ensure our business continuity with partners and also declaring compliances laid down in "Code of Conduct" through a self-certification process.

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.

We consume batteries, electrical and electronic products in our business operations. Batteries are classified as hazardous waste; ACs, Stabilizer, Micro Cooling Unit (MCU) and Transmission Cooling Unit (TCU) as e-waste; whereas towers as other non-hazardous waste.

Material deployment from warehouse to sites gets completed through the process of Stock Transfer Note (STN). The retrieval of material from sites to warehouse is initiated post completion of its shelf life through the process of Site Return Note (SRN) which is initiated by user. Post Receipt of Material at warehouse, it flows into the Process of Health Assessment which is done by Chartered Engineers (CE) followed by Item Validation by Subject Matter Expert (SME) Partners for declaring it as either Repairable or Scrap. Items parked in Repairable Bucket are redeployed to field post completion of repair at SME Workshop/Repair Pre-Dispatch Inspection (RPDI) process.

SRN Material identified as scrap by SME/CE are further assessed by respective Circle Scrap Disposal Committee (Consisting of Circle Supply Chain/Operations/Quality/Finance Members) (CSDC). Post CSDC Confirmation approval is initiated for its disposal.

Disposal of assets falling under respective buckets including E Waste/Hazardous Waste/ General Waste etc. is done through E Bidding Platform wherein only Authorized/Approved Recyclers are allowed to participate in Auction followed by Scrap Lifting from respective warehouse locations.

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 EPR plan submitted to Pollution Control Boards?

Not applicable

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

Indus believes people excellence is the foundation for building a culture of service excellence. The Company strives to strengthen its people culture with continued commitment to its values, people engagement, well-being and diversity. It encourages a culture that supports each employee to realize his or her highest potential. Promoting a safe and empowered workplace with a culture that emphasizes equal opportunity, non-discrimination, meritocracy and freedom of expression is paramount to the Company. The Company aims to provide an environment for the talent to grow and flourish. Company believes in enabling critical and differentiated talent in new categories and channels, strengthening capabilities in a high-performing team, winning talent through a compelling employee value proposition, reconstructing its ways of working and people policies to stay ahead of the curve.

Essential Indicators

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

Category	Total (A)	% of employees covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	3,135	3,135	100%	3,135	100%	Not applicable	Not applicable	3,135	100%	Not applicable	Not applicable
Female	419	419	100%	419	100%	419	100%	Not applicable	Not applicable	419	100%
Total	3,554	3,554	100%	3,554	100%	419	12%	3,135	88%	419	12%
Other than Permanent employees - Indus Towers has all permanent employees. Hence, this is not applicable											

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

Category	Total (A)	% of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent workers - Not applicable											
Other than Permanent workers											
Male	7,631	7,631	100%	7,631	100%	Not applicable	Not applicable	7,631	100%	Not applicable	Not applicable
Female	274	274	100%	274	100%	274	100%	Not applicable	Not applicable	Not applicable	Not applicable
Total	7,905	7,905	100%	7,905	100%	274	3.47%	7,631	96.53%	Not applicable	Not applicable

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	0.07%	0.03%

Note: Permanent Employees have been considered.

2. Details of retirement benefits-

Benefits	FY 2023-24			FY 2022-23		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	No	100%	100%	No
ESI	0%	100%	Yes	0%	100%	Yes
Others - please specify	-	-	-	-	-	-

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.

We promote a culture of inclusion for all within the organisation. While some of our offices are compliant as per the requirements of the Rights of Persons with Disabilities Act, 2016, we plan to make all offices compliant.

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.

We believe in equal opportunity for all and are committed to providing an inclusive work culture and an environment free from any form of discrimination. Indus Towers has an equal opportunity policy which is a part of the code of conduct. The Code of conduct is available at <https://www.industowers.com/wp-content/themes/indus/pdf/policy/Code-of-Conduct-april.pdf>.

In order to support the above-mentioned philosophy, Indus has categorized its guidance as follows:

- (i) Equal employment and growth opportunities;
- (ii) Assigning roles as per employee's capabilities; and
- (iii) Discrimination free pay.

The Company endeavors to offer equal opportunity to all its employees and not engage in or support discrimination in hiring, compensation, access to training, promotion or career advancement, termination or retirement, based on ethnic origin, position, color, race, caste, religion, disability, sex, sexual orientation, pregnancy or political orientation.

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%	92%	Not applicable	
Female	100%	89%		
Total	100%	92%		

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

Particulars	Details of the Grievance Redressal Mechanism
Permanent workers*	Indus is committed to providing a safe and positive work environment. The Company envisages an open-door policy and employees have access to several forums where they can raise concerns faced at the workplace. Indus's Whistle Blower Policy provides a mechanism for employees to report any grievances. All employees have access to the Ombudsman through writing a letter, meeting in person, sending email at ombudsman@industowers.com or can raise their concern through lodging any wrongdoing through Corporate Whistleblower Initiative portal www.cwportal.com . For POSH related matters, incidents can be reported to the Chairperson - Internal Complaints Committee at secured hotline or through an email at harassment.response@industowers.com . For genuine concerns, a detailed investigation process is undertaken ensuring fairness for all involved, with an opportunity to present facts and any material evidence. All complaints are dealt with on the principles of natural justice, confidentiality, sensitivity, non-retaliation, and fairness while addressing the concern. The concerns are handled with sensitivity, while delivering timely action and closure. Stakeholders also have access to the chairperson of the Audit & Risk Management Committee.
Other than permanent workers	
Permanent employees	
Other than permanent employees*	

*Not applicable

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

Nil. However, the Company recognizes the right of its employees to assemble, communicate, and join associations of their choice in matters related to their employment within the purview of Company's policies and procedures. Company respects the rights of its employees to associate or not associate through internal employee resource groups and seek representation, to bargain or not bargain collectively in accordance with local laws. As on March 31, 2024, none of the employees of Indus was part of any collective bargaining as per the information available with the Company. No trade union has claimed any of Indus employees' is their member.

8. Details of training given to employees and workers -

Category	FY 2023-24					FY 2022-23				
	Total (A)	On health and safety measures*		On skill upgradation		Total (D)	On health and safety measures*		On skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No.(F)	% (F / D)
Employees										
Male	3,135	3,029	96.6%	3,119	99.49%	3,044	3,029	99.51%	3,021	99.24%
Female	419	393	93.8%	416	99.28%	205	205	100%	201	98.05%
Total	3,554	3,422	96.3%	3,535	99.47%	3,249	3,234	99.54%	3,222	99.17%
Workers -	Though the workers are contracted via a 3 rd party. Trainings to these topics are done to ensure workplace safety									
Male	7,631	7,631	100%	-	0%	6,666	6,666	100%	-	-
Female	274	274	100%	-	0%	204	204	100%	-	-
Total	7,905	7,905	100%	-	0%	6,870	6,870	100%	-	-

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

Category	FY 2023-24*			FY 2022-23*		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	2,775	2,775	100%	2,712	2,712	100%
Female	177	177	100%	147	147	100%
Total	2,952	2,952	100%	2,859	2,859	100%
Workers						
Male	5,829	5,829	100%	5,018	5,018	100%
Female	156	156	100%	145	145	100%
Total	5,985	5,985	100%	5,163	5,163	100%

*Performance and career development review of the eligible employees was done during the Financial Year based on the performance of the previous Financial Year

10. Health and safety management system -

a) Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, what is the coverage of such a system?

Yes, Indus Towers has occupational health and safety management that has been implemented across all the circles for its employees, associates and partners. The OSH spells out the written processes supported with Standard Operating Procedures which provide the guidelines for the field force to comply with. Safety performance is being measured using a scoring system known as ESH index. Governance processes to monitor the OSH implementation, progress on recommendations and progress on creating "Positive Behaviour" at work are also monitored periodically. Governance programs that operate at circle and corporate level are - Circle ESH Council, Partner ESH Council, Partner Corporate Governance meetings, corporate operations review and review at Management Committee meetings.

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

There are multiple channels established for the identification of the hazards, risk assessments and communication of the hazards (including to field force and last mile).

I-Mapp - Indus Towers has a robust tool in place called I-Mapp to report work-related hazards. The tool makes it easy for anyone to report any kind of hazard. After validation, a ticket is assigned to the individual (who reports a hazard) and the progress is monitored till closure.

Target-based Hazard Reporting-

To foster a strong hazard-reporting culture, we have introduced Target-Based Hazard Reporting in FY 23-24. In this program, role-wise targets are set for employees for reporting hazards. Reporting status is reviewed by reporting managers and the ESH team on a monthly basis and during ESH reviews. Compliance with hazards reporting targets is also part of circle safety performance matrix - ESH Index. This proactive approach enables us to address safety issues swiftly, minimizing their impact on people and equipment.

Leadership site visits:

Regular site visits by the leadership demonstrate and reinforce Indus commitment to ensuring a safe work environment and set positive examples for the entire team. In FY 23-24, a new program for monthly site visits by the circle and corporate leadership team including Management committee members was initiated where monthly targets are set for the leadership team, and they audit site conditions and potential hazards and record observation in Leadership Site Observation Form (LSOF) on the I-Mapp tool.

In addition to I-Mapp, many other campaigns were launched to identify the hazards at the sites like:

- Project NoTE- It is a safety campaign aimed at identifying unsafe transformers and fixing anti-climbing and fencing of the same. This was a 60-day program that made employees and families sign an affidavit for not working on unsafe transformers and EB lines.

- e Safe campaign
The site visits conducted follow certain theme for the month to identify the hazards. A few examples are rental DG process compliance, Warehouse audits, hygiene checks, safety at new build sites and PPE compliance check at field.
- Elect-RA campaign.
The main objective of Elect-RA camping was to spread awareness of electrical & road-related hazards and correction of critical electrical safety hazards at sites.

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

Any employee, associate, or technician can report hazards through I-Mapp. The target-based hazard reporting encourages everyone to report site hazards. The hazard reporting compliance and its closure are being reviewed at various governance meetings. There are connect programs between technicians and Field Service Engineer (FSE), Area Operation Manager (AOM) and up to Circle CEO level where any technician can raise the red flag for any hazard. Apart from reporting, various platforms have been established for communication of hazards.

Few of such initiatives are: Daily TBTs (Toolbox Talks), con call with last miles, mailers, release of safety advisories and ESH Video Conferences.

d) Do the employees/workers of the entity have access to non-occupational medical and healthcare services?

Yes. A list of hospitals is available with all the corporate office and all circles where the employees can avail the healthcare services. Tie-up with doctors has been provided where telephonic or physical consultation can be availed. In addition to this, various monthly /bimonthly connects are organised with experts for the employees where they can take guidance on different matters of well-being like seasonal diseases, stress management and mental health amongst many others.

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 hour worked)	Employees	1.46	2.08
	Workers	0.76	1.14
Total recordable work-related injuries	Employees	18	23
	Workers	19	32
No. of fatalities	Employees	0	0
	Workers	2	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

In FY 2023-24, our company remained steadfast in its commitment to prioritizing safety across business. With relentless efforts and unprecedented challenges to achieve the highest Tower delivery during FY 2023-24, the team has ensured significant advancements in our safety performance. It reflects our unwavering dedication to the well-being of our employees, partners and stakeholders. In the coming FY25, our goal remains to focus on ZERO HARM.

FY 2023-24 Key Highlights:

- 1. Enhanced Permit to Work (PTW) Compliance:** Permit to Work (PTW) compliance has been tracked throughout the year and compliance has increased from 73% (Q1 FY 24) to 96% (Q4 FY 24). Overall, 83.44% cumulative PTW compliance has been achieved, which is significant testimony of the efforts by our field team.
- 2. Hazard Reporting improvement:** In our continuous efforts to enhance safety, we implemented streamlined reporting procedure for hazard reporting to facilitate the prompt identification and resolution of safety concerns. The count of hazard reporting has significantly increased from 46,575 (FY 23) to 260,260 (FY 24). This proactive approach enabled us to address issues swiftly, minimizing their impact on operations.
- 3. Earthing compliance:** The electrical hazards are associated with the nature of our business. Therefore, prevention of any possible electric shock becomes critical. We closely monitored our sites throughout the year and worked to rectify the site Earthing. It resulted in the improvement of Earthing compliance from 47.5% (FY 2022-23) to 78.49% (FY 2023-24).
- 4. Enhanced Training Initiatives:** We bolstered our safety training initiatives to equip employees with the necessary knowledge and skills to identify and mitigate potential hazards effectively. By investing in comprehensive training programs, we fostered a culture of safety consciousness across all levels of the organization. Dedicated training programs to emphasize safety measures related to electrical work and work at height, named as STAC trainings, have been provided to Turnkey service provider (TSP) Supervisors & Riggers. As part of continuous learning, ESH Induction and Mod Zero trainings are provided to all new joiners.
- 5. Reduced LTI & FA Incidents:** Throughout the year, we achieved a notable reduction in workplace Lost Time Injury (LTI) & First Aid (FA) incidents compared to previous years.

A total of 33% reduction in the LTI & FA has been reported as compared to the previous year. This accomplishment is a testament to the effectiveness of our safety protocols and the diligence of our workforce in adhering to best practices.

- 6. Embracing Technology:** Leveraging technological advancements, we integrated innovative safety solutions, including Tower Operating Centre (TOC) enabled PTW authorization (New built & Run projects), virtual reality (VR) based training and assessment on working at height, app-based tracking of ESH initiatives and many more. These initiatives not only improved safety outcomes but also enhanced operational efficiency.
- 7. Employee Engagement:** Through targeted safety campaigns, training programs and engagement initiatives, we empowered our workforce to take an active role in promoting safety awareness and hazard identification, fostering a culture where safety is everyone's responsibility. Some of the key initiatives include- Elect-RA campaign with Family connects. Field staff members attended DDT (Defensive Driving Training), Supervisors trained on PTW, Electrical inspection at sites, Operators Companies (OPCO) engagement, out of the box activities etc., National Safety week celebration, two days ESH capacity building workshop on Work at Height & Fall Protection Engineering for ESH team, approx. 5,000 tool box talks (TBTs) per month etc.
- 8. Leadership Engagement:** Our Leadership is committed towards safety by demonstrating engagement into several ESH initiatives, such as Field visits as per Leadership site observation form (LSOF Process), Last mile connect, Quarterly ESH addressal by COO etc.
- 9. Collaborative Partnerships:** We actively engaged with industry peers, local authorities, subject matter experts and community stakeholders to exchange best practices, participate in safety campaigns and promote collective initiatives aimed at advancing safety standards community wide.

Looking Ahead:

As we embark on FY 25, our commitment to safety remains resolute. We will continue to prioritize the well-being of our employees, uphold the highest safety standards, and explore innovative, and technology led strategies to further enhance our safety performance. Through collaboration, education, and a steadfast commitment to continuous improvement, we are confident in our ability to sustain our momentum and achieve even greater milestones in safety excellence.

Indus Towers is committed to fostering a culture of safety excellence, where the well-being of our employees is paramount, and where every individual plays a vital role in creating a safe and healthy workplace.

FY 2023-24 was marked by progress in our safety performance, but as we recognize that safety is a journey, not a destination, and we remain steadfast in our pursuit of our aim- ZERO HARM. With the collective efforts of our dedicated workforce and the support of our stakeholders, we are poised to build upon our successes and reaffirm our position as a Safety Leader in the industry.

13. 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
Working conditions			Nil			
Health & Safety						

14. Assessments for the year -

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health & Safety	100% of our offices and sites are assessed by us internally.
Working conditions	

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

Our processes to ensure a high level of workplace health and safety are very stringent and binding. We continuously assess our workplaces to check for any malfunctioning. Our assessment revealed that Electrocutation has been a major contributor for accidents and Indus spends significant time, energy and resources to tackle this. To intercept this problem, we have launched two full-fledged campaigns. These campaigns focus on connecting with families to create safe behaviour in terms of adopting safe practices and usage of PPEs. The focus of these campaigns was also on identification and corrections of hazards at sites during mobile DG installations, transformers, and other critical activities. Our objective was to address the behaviour as well as the technical aspects of electrical safety.

To read more about the initiatives undertaken by the Company for employee wellbeing, health and safety, please refer to the Human Capital of the Integrated Report.

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).

Yes

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

Our ERP systems are configured for accounting, deductions of applicable TDS for all stakeholders including business partners and landlords and internal financial controls are established to ensure compliance to deposits. Company ensures that value chain partners deposit the claimed GST and regularly audit the same to ensure compliance, disengage with partners who are repeat default. For our manpower service providers, company has appointed 3rd party auditing firm to check compliance.

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

	Total number of affected workers/ employees		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	Not applicable	Not applicable	Not applicable	Not applicable
Workers	Not applicable	Not applicable	Not applicable	Not applicable

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

No

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	52%

*Considered Supply Partners and recurring Service Partners

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.

Consequence management for violation to ESH practices defined is handled through a contracted framework for recurring and high business volume service, Permission to work is mandated to be obtained by service provider before initiation of any work at telecom sites. Mobile applications for all field staff are configured to periodically report hazards and initiate trouble ticket for corrective actions on faults of potential hazard.

Indus and third-party employees working in the field are periodically being audited for usage of defined PPE while commuting and working at site and any non-compliance observed is addressed under consequence management matrix.

For Supply partners their manufacturing facilities are audited by third party for working conditions and safe practices. Observations made are tracked for correction and systemic solutions.

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

At Indus, we have always been committed to integrating multiple stakeholders in our business model. With the philosophy of ‘Putting India first’ we work towards preserving and enhancing long-term value of our stakeholders. In our endeavour to build a sustainable future, we aim to develop strategic partnerships with our stakeholders and increasingly engage with them. Stakeholder inclusivity and prioritisation ensure the correct understanding and adequate response to stakeholder needs, interests and expectations. We continue to build and nurture strong relationships with our stakeholders including employees, customers, shareholders, government, communities, suppliers and landlords.

Essential Indicators

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

The stakeholder identification process at Indus includes - Identification of all interested and impacted groups, classification of stakeholders in relevant categories and identification of priority groups within each category. The aforesaid steps help in identification of stakeholders

- who are directly or indirectly dependent on Indus’s services or on whom Indus is dependent in order to operate, or
- to whom Indus has, or in the future may have, legal, commercial, operational, or ethical/moral responsibilities or
- who can influence or have an impact on Indus’s strategic or operational decision-making.

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

Stakeholder group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community meetings, Notice board, Website), Other	Frequency of engagement (Annually/ half-yearly/ quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	<ul style="list-style-type: none"> • Email • SMS • Notice Board • Website • Townhalls • Field Connect • Video Conference • Workplace 	Ongoing	<ul style="list-style-type: none"> • Employee benefits • Equal opportunities • Recognition • Learning and development • Safety and well-being • Performance review and career development
Customers	No	<ul style="list-style-type: none"> • Emails and Phone calls • Regular Governance Meeting 	Ongoing	<ul style="list-style-type: none"> • High Network uptime • Operational efficiency • Innovative and sustainable solutions • Customer feedback and resolution of their queries. • Collaborate with them for increasing the network footprints
Shareholders	No	<ul style="list-style-type: none"> • Investor meetings/ conferences • Annual General Meeting • Website updates • Stock Exchange releases 	Ongoing	<ul style="list-style-type: none"> • Plans to maximise returns to the shareholders • Queries on financial and operational performance of the company • Transparent disclosures of material events

Stakeholder group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community meetings, Notice board, Website), Other	Frequency of engagement (Annually/ half-yearly/ quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Regulatory Bodies	No	all	Regularly on need basis	<ul style="list-style-type: none"> • To policy advocacy for the benefit of organization e.g. RoW Policy & related issues with DoT, MoD, MORTH MoP, Railways, State Government etc. at central & state level. • Interaction with various associations to provide inputs as per our views and requirement. • Work with TRAI to come up with consultation paper to resolve issues with scope of IP1s, ease of doing business, relaxation in regulatory requirements etc. • Work and align with state government, authorities to implement policy notified by Central Government etc.
Community	Yes	<ul style="list-style-type: none"> • Engage regularly with community representatives through emails and phone calls • Participate in conferences, roundtable discussions and summits to widen the reach • In-person events and Community meetings 	Ongoing	<ul style="list-style-type: none"> • Community development • No negative impact of business operations on the Community • Community grievance redressal
Suppliers	No	<ul style="list-style-type: none"> • Electronic correspondence • Supplier audits and visits • Company’s Website • Annual vendor Meet 	Ongoing	<ul style="list-style-type: none"> • Resolving supplier queries • Assessing supplier performance • Supplier recognition and engagement activities • Undertaking discussion on Sustainability Parameters

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.

ESG priorities in the Company are driven from the uppermost level i.e. the Board of Directors. Board provides the strategic oversight and has constituted an ESG Committee to provide guidance and to monitor the ESG progress. The ESG Committee of the Board has delegated the process of undertaking consultations with stakeholders to the management. The outcomes from such consultations are shared with the Committee and the Board.

- During FY 21-22, Indus has undertaken a comprehensive materiality assessment and stakeholder engagement exercise to identify environmental, social and governance (ESG) topics of significance to its business.
- As a part of this exercise, Indus team along with an external agency, with requisite experience, engaged with the key internal and external stakeholders to understand their concerns and incorporate their views into materiality assessment, for prioritizing ESG topics.
- Insights gathered through stakeholder engagement were analysed to develop the materiality matrix and arrive at the final list of ESG focus areas. Result of this assessment was presented to the ESG Committee and the Board.
- The ESG Committee and the Board deliberated at length on the outcome / feedback. The outcome has been considered for defining ESG targets and initiatives of the company.

For more details on our stakeholder consultation process, please refer to the Materiality Assessment & Stakeholder Engagement section of the Integrated Report.

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 the policies and activities of the entity.

Yes, as part of the materiality assessment exercise, Indus consults with key stakeholders to identify and prioritise environmental and social issues that are material for Indus.

During FY 21-22, Indus had undertaken a comprehensive materiality assessment and stakeholder engagement exercise to identify material environmental, social and governance (ESG) topics.

The information collected from internal and external stakeholders was analyzed and the key material issues were grouped into 13 core thematic areas. These issues were mapped as High, Medium, and Low. The High priority areas included - GHG Emissions, People Practices, Health and Safety and the Medium priority areas included- Risk Management, Waste Management and Sustainable sourcing.

The inputs gathered from stakeholders during the engagement and as an outcome of the assessment were considered by the ESG Committee and the management to lay down the ESG Strategy of the Company. The Company's ESG strategy was finalized by prioritizing the focus areas under E, S and G. The Company has also established medium to long-term ESG Commitments. To deliver on these commitments, the Company has set measurable internal and external targets and is in the process of developing a roadmap to achieve them.

- To decarbonize its business, Indus has joined the race to reach net-zero greenhouse gas emissions by 2050 in line with climate science with the Science Based Targets initiative (SBTi). The Company is in the process of developing a decarbonization roadmap.
- To continuously make the business operations greener by exploring and expanding alternate energy solutions.
- Indus is committed to driving zero harm in its operations thereby fostering a culture of safety.
- To strengthen people practices, a separate Human Right Policy has been published, targets were taken on learnings and trainings, and

on prioritising diversity and inclusion across business and value chain.

- To manage the waste responsibly, Indus has taken target to reduce/ reuse/ recycle 100% of waste.
- Indus has set up targets to engage with its supply chain and make it more sustainable and resilient. Published Sustainable Sourcing Policy for the suppliers during the year and conducted a survey of the top partners on ESG parameters to understand their ESG maturity.
- Ambitious targets of touching and transforming lives and fulfilling corporate responsibility of developing communities.

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

Indus through its CSR initiatives create a positive impact in the lives of disadvantaged, vulnerable and marginalized communities, in association with implementing partners. Indus Towers has always been at the forefront of providing support towards social concerns under CSR Flagship Programs namely Saksham and Pragati. Under the Saksham CSR Flagship Program, the activities focused on thematic areas are Education, Empowering Girl Child, Digital and Creative Literacy and Skill Development. Under the Pragati CSR Flagship Program, the activities focused on thematic areas are Local community needs and Disaster Relief and Rehabilitation.

With the objective to provide free quality education to disadvantaged and marginalised children in rural areas, Satya Bharti School program, Quality Support Program and Girl Child Education Program has been initiated. Through these programs, the access to free and quality education in rural areas has been made easy to more than 1 Lac children including focus on Girls Education. It has also created employment opportunities for educated youth in the rural areas like teachers, empowered girl children, and has increased awareness among communities on the importance of education.

To reduce the digital divide and to bring in the world of information to isolated and disadvantaged groups in rural/urban slums in Delhi, Dehradun and Bhopal, Indus provides mobility solution through its 20-seater solar enabled Digital transformation Bus program which not only provides various digital certified courses but also provides awareness to community through mass literacy program and this year has supported around 30,000 beneficiaries with specific expansion focus on women digital Literacy and elder citizens Literacy. Indus has also initiated the expansion of DTV programs in

Maharashtra, Chattisgarh and Jharkhand. Indus through its Gurushala program has trained more than 70,000 teachers this year pan India in innovative teaching practices and integrate technology in their classrooms and benefitted over 24 Lac students. Also, through The TeachersApp program, more than 34,000 teachers are registered to enhance their skills in innovative teaching practices. Indus has set up smart classrooms in 106 Govt. schools to teach students digital and IT Skills along with empowering teachers with 21st Century skills.

To reduce inequality and promote inclusive participation, Indus provides scholarships to students with disabilities in the age group of 14-30 years to pursue their studies. Indus Towers Scholarship program (ITSP) not only provides scholarships but also provides need-based support in transport, accommodation, study materials, assistive devices allowances on a case-to-case basis. This year scholarship was provided to 180 students with disabilities and also continued support to 271 students for higher education. Support education of children with disability extended by providing school bus to Specially Abled school. Indus also provided scholarships for 100 academically qualified students from underprivileged community to pursue higher education in engineering.

To enhance the livelihood of more than 7 Lac farmers Indus through Smart-Agri program provides sustainable farming approaches and use of Smart Technologies which helps to improve agricultural outputs and reduce the input costs for farmers by ways of real time advisory information.

Indus has contributed towards the construction of Girls Toilet in 12 Government schools of Assam benefiting more than 2,300 girl students.

With focus on environment, Indus supported research and development projects with IIT, Madras by setting up laboratories on Green Hydrogen and Battery Management System.

Indus under its disaster relief and rehabilitation initiative has provided relief material during Manipur Violence and also has constructed prefabricated schools during flashfloods in Mandi, Himachal Pradesh.

To provide a safe environment for abandoned and parentless children Indus through Project Nurture of SOS Children's village for holistic development of 530 children along with 53 SOS mothers.

Principle 5 Businesses should respect and promote human rights

The Company's core priorities include respecting the human rights of each and every stakeholder, across the value chain. Indus's commitment to human rights is reinforced through its Code of Conduct (COC). The Company complies with all local labour laws and regulations applicable in its operating locations. The Company's COC is applicable to all employees, partners and suppliers to uphold and respect human rights. Compliance with the Code, the relevant labour laws and human rights regulations applicable in the geographies of operation is a major part of associating with Indus. The Company has established processes to address material issues pertaining to compliance, employee well-being and safety, and ensure a harassment-free workplace. The Company has published a separate Code of Conduct for Business Partners.

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)
Permanent Employees	3,554	3,429	96.50%	3,249	3,235	99.6%
Other than Permanent Employees	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Permanent Workers	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Other than Permanent Workers	Not applicable	Not applicable	Not applicable	Nil	Nil	Not applicable

For FY 2022-23 Human Rights covered under Code of Conduct.

* For FY 2023-24 Seprate Human Right Policy and training reported.

2. Details of minimum wages paid to employees and workers-

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)
Permanent Employees										
Male	3,135	0	0%	3,135	100%	3,044	0	0%	3,044	100%
Female	419	0	0%	419	100%	205	0	0%	205	100%
Total employees	3,554	0	0%	3,554	100%	3,249	0	0%	3,249	100%
Other than Permanent Employees	Not applicable									
Permanent Workers	Not applicable									
Other than Permanent Workers										
Male	7,631	0	0%	7,631	100%	6,666	0	0%	6,666	100%
Female	274	0	0%	274	100%	204	0	0%	204	100%
Total workers	7,905	0	0%	7,905	100%	6,870	0	0%	6,870	100%

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)	4	3,125,000	2	2,968,750
Key managerial personnel*	1	45,227,666	1	5,862,451
Employees other than BoD and KMP	3,131	1,014,000	293	1,132,000
Workers	7,631	328,536	274	366,846

* KMP excludes MD & CEO

The above-mentioned information pertains to employees excluding GETs. The Median Remuneration including GETs for 3133 Males is 1,013,500 and 418 Females is 760,000.

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	8.02%	5.69%

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.

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

Indus is committed in providing a safe and positive work environment and has a zero tolerance for any human right violation. In this regard the Company encourages an open-door policy. Company has built a strong mechanism for reporting of matters or concerns faced at the workplace.

Any employee, retainer/ consultant, associate, supplier or a business partners can approach the Ombudsman to voice his or her concerns. The Company also has policy on Prevention of Sexual Harassment (POSH), and any such concern can be reported to Chairperson of Internal Complaints Committee. All actual violations are dealt seriously on the principles of natural justice, confidentiality, sensitivity, non-retaliation, and fairness while addressing the concern. The concerns are handled with sensitivity, while delivering timely action and closure.

More details on the process/mechanism are available in our Whistle Blower Policy available on the website of the Company and in the policy on Prevention of Sexual Harassment (POSH).

In FY 2023-24, we also introduced training on Human Rights to apprise the internal stakeholders of their rights & obligations.

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	2	Nil	-	2	Nil	-
Discrimination at workplace	Nil	Nil	-	Nil	Nil	-
Child labour	Nil	Nil	-	Nil	Nil	-
Forced labour/Involuntary labour	Nil	Nil	-	Nil	Nil	-
Wages	Nil	Nil	-	Nil	Nil	-
Other human rights-related issues	Nil	Nil	-	Nil	Nil	-

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

	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	2	2
Complaints on POSH as a % of female employees / workers	0.63%	1.02%
Complaints on POSH upheld	2	2

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

Retaliation is strictly against the Company's Code. All genuine complaints made in good faith, even if not proven, can be made without fear of reprisals, punishment, intimidation, coercive action, dismissal, or victimization. All actual violations are dealt seriously on the principles of natural justice, confidentiality, sensitivity, non-retaliation, and fairness while addressing the concern. Anyone involved in targeting a person raising such complaint will be subject to disciplinary actions.

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

Yes

10. Assessments of the year

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

*Indus internally monitors compliance with all relevant laws and policies pertaining to these issues.

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

No significant risk or concern were identified in our operations.

Leadership Indicators

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

Our Internal Complaint Committee noted complaints filed by the employees for sexual harassment and took a measure to make people more sensitive towards such issues. We introduced 'Gender Sensitization' program and ran awareness campaigns to create an enabling environment of gender equity and educate our employees about exhibiting appropriate behavior. Our workshop on gender sensitization program covered about 75% of the employees across our pan India offices.

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

At Indus Towers, we are committed to nurture a greener future, backed by our sustainable operations. With our primary focus on energy efficiency, fossil fuel's elimination and waste minimisation, we continue our resolve to reduce our carbon footprint. We have consciously developed a responsible approach towards the environment and continue to deploy people, ideas and resources to design effective solutions for a sustainable tomorrow.

Essential Indicators
1. Details of total energy consumption (in Gigajoules) and energy intensity, in the following format:

Parameter	FY 2023-24	FY 2022-23
From renewable sources		
Total electricity consumption (A)	-	-
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	77,400	10,279
Total energy consumed from renewable sources (A+B+C)	77,400	10,279
From non-renewable sources		
Total electricity consumption (D)	31,277,936	28,232,085
Total fuel consumption (E)	2,443,879	10,707,769
Energy consumption through other sources (F)		
Total energy consumed from non-renewable sources (D+E+F)	33,721,815	38,939,854
Total energy consumed (A+B+C+D+E+F)	33,799,215	38,950,133
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	0.000118	0.000137
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	-	-
Energy intensity in terms of physical output	163 GJ/tower	196 GJ/tower
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.

-Yes, Reasonable Assurance done by Cetizion Verifica

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.

We do not have sites/facilities identified as designated consumers under the PAT Scheme.

3. Provide details of the following disclosures related to water -

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in kilolitres)		
(i) Surface water	Nil	Nil
(ii) Groundwater	Nil	456
(iii) Third party water	473,287	172,265
(iv) Seawater/desalinated water	Nil	Nil
(v) Others	Nil	Nil
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	473,287	172,721
Total volume of water consumption (in kilolitres)	473,287	172,721
Water intensity per rupee of turnover (Water consumed / turnover)	0.0000002	0.0000006
Water intensity (optional) – the relevant metric may be selected by the entity	2.28 KL/Tower	-

For FY24, there is an increase in reporting of water consumption due to higher number of roll outs and consideration of water consumption for maintenance into accounting

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

-Yes, Reasonable Assurance by Cetizion Verifica.

4. Provide the following details related to water discharged: Not applicable

Parameter	FY23-24	FY22-23
Water discharge by destination and level of treatment (in kilolitres)		
(i) Surface water	-	-
- No treatment - With treatment – please specify level of treatment	-	-
- 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)	-	-

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

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

Not applicable

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

Parameter	Please specify units	FY 2023-24	FY 2022-23
NOx	Metric Tonne	5,534	6,146
Sox	Metric Tonne	-	-
Particulate matter (PM)	Metric Tonne	290	318
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Carbon monoxide	Metric Tonne	3,390	3,717

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

Parameter	Please specify units	FY 2023-24	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)	Metric tonnes of CO ₂ equivalent	724,118.70	802,509
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)	Metric tonnes of CO ₂ equivalent	6,220,834	5,567,995
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/ Revenue from operations)	Metric tonnes of CO ₂ equivalent per INR	0.000024	0.000022
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)	-	-	-
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tonnes of CO ₂ equivalent per tower	33.4	33.6*
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

*The GHG emissions intensity (MTCO₂e/Tower) for FY 2022-23 has been revised considering the weighted average tower count for the year.

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.

-Yes, Reasonable Assurance by Cetizion Verifica.

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

At Indus, we have consciously developed a responsible approach towards the environment. We are constantly aligning our actions with the UN Sustainable Development Goals (SDGs), with a firm belief in fulfilling our obligations towards the environment. We are undertaking various measures across our operations to reduce carbon emissions. We adopt commercially and technically viable alternatives to minimize our reliance on carbon-intensive energy sources.

- Solar sites 14,000+ new solar installations across our tower sites. 12 of our warehouses are equipped with solar power.
- Microgrid Sites are powered by solar/wind microgrids to decentralize power generation to localized renewable energy generation, ensuring a reliable and sustainable power supply to provide uninterrupted service to our customers.
- Piped Natural Gas 100+ sites are powered through PNG
- Fuel Cell solutions
- Hybrid Solutions (Solar+Wind) We have piloted one hybrid renewable energy solution at Andhra Pradesh and another one will soon be commissioned at Maharashtra. These solutions are in line with our commitment to increase our RE portfolio.
- Green Open Access Energy-We have signed a PPA with an RE provider for 8.3 MW pilot at Karnataka. Going forward, we intend to invest more in Green Open Access to contribute towards the country's goal of enhancing the share of RE in the total energy mix.
- ID-OD Conversion-91% Sites are outdoor thereby reducing the negative environmental impact associated with diesel usage
- Electrification of sites- During FY 2023-24, 192 old and non-electrified sites have been converted to electrified sites to reduce the dependency on diesel.
- DG-free sites- To reduce diesel consumption, we have initiated the DG-free sites initiatives. During FY 2023-24, by adopting alternative energy sources, DG dependency has been removed across 5,000+ sites
- Deployment of storage solutions- During the year, we deployed advanced storage solutions, including Li-Ion and VRLA batteries.
- Initiatives undertaken to reduce diesel consumption through Diesel to Gas Converted Generators

- Retrofit Emission Control Device : AHODS is the solution, comes under dual fuel kit category. In this solution hydrogen generator is used to generate hydrogen which is used in the air intake of the DG, reducing the PM by 50%. The solution also reduces GHG emission.
- Graphene Super capacitor Battery Bank: The graphene super capacitor is promising for cyclic application and pilot is initiated on 1 site. This solution will enable 30% reduction in diesel consumption.
- Other energy – efficiency measures- Operational efficiency through energy-efficient technologies and optimizing cooling systems and regular maintenance reduced our overall energy consumption.

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

Parameter	FY 23-24	FY 22-23
Total Waste generated (in metric tonnes)		
Plastic waste (A)	-	-
E-waste (B)	2,830	3,599
Bio-medical waste (C)	-	-
Construction and demolition waste (D)	-	-
Battery waste (E)	41,641	30,891
Radioactive waste (F)	-	-
Other Hazardous waste (G) (Lube Oil) in KL *	422	-
Other Non-hazardous waste generated (H)**	23,181	17,414
Total (A+B + C + D + E + F + G + H)	68,074	51,904
Waste intensity per rupee of turnover (Total waste generated/Revenue from operations) (Metric tones/INR)	0.0000002	-

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)

Category of waste		
(i) Recycled***	66,593	34,537
(ii) Re-used	-	-
(iii) Other recovery operations	1,481	17,361
Total	68,074	51,904

For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)

Category of waste		
(i) Incineration	-	-
(ii) Landfilling	-	-
(iii) Other disposal operations	-	-
Total	-	-

* Hazardous waste includes used lube oil and is reported in Kilo litres

** Other non-hazardous waste includes sheet metal, cables, connectors, AC accessories, DG racks, office waste, etc.

*** Recycled waste includes e-waste, battery waste, used lube oil and other non-hazardous waste except office waste

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.

- Yes, Reasonable Assurance by Cetizion Verifica.

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.

Company invest time and money in getting a thorough assessment of assets for residual life by a chartered engineer firm. Efforts are being made for refurbishing & reviving assets for enhancing reusable life, assets which are End of Life post the due assessment are being sold to PCB authorised recyclers of respective commodities through a Government of India enterprise (MSTC).

For more details, please refer Principle 2-question 3

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.
1.	Indus Towers has a Pan India presence	Telecom tower installation	Yes. The Company takes the required NOCs and permissions from concerned authorities.

We have pan India presence with 219,736 towers. We are planning to undertake a detailed assessment of our operations in/around ecologically sensitive areas. However, the Company obtains the requisite environmental approvals/clearances for installation of its towers.

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

Environmental Impact assessment (EIA) is not applicable to Indus activities as per the EIA Notification, 2020.

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

Yes, we are materially in compliance with applicable laws & regulations.

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:

(i) Name of the area

(ii) Nature of operations

(iii) Water withdrawal, consumption and discharge in the following format:

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

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

Parameter	Unit	FY 2023-24	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)	Metric tonnes of CO ₂ equivalent	2,461,447	2,078,528*
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO ₂ equivalent per INR	0.000009	-
Total Scope 3 emission intensity (optional) - the relevant metric may be selected by the entity	Metric tonnes of CO ₂ equivalent per tower	11.85	-

*Total scope 3 emission for FY2022-23 was inadvertently reported as 2,069,193 Metric tonnes of CO₂ equivalent in last year's report.

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.

Yes, Limited Assurance by Cetizion Verifica.

3. 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:

Initiatives	Details of Initiatives	Outcome
Enhancement of usable life of equipment by Refurbishment	Company invests time and money in getting a thorough assessment of assets for residual life by a chartered engineer firm. Efforts are made for refurbishing and reviving assets for enhancing reusable life.	Enhanced equipment lifecycle
Solar Projects & others	Exploring green energy solutions through deployment of captive solar plants and PPAs with 3 rd party	Shift to renewable sources of energy
Value Addition, Value Engineering	Design of equipment/solution procured is periodically reviewed for VA/VE to the changing telecom needs and optimisation of solutions and capacity in accordance	Reduced use of raw materials, efficient solutions
Regional level partners--> save primary transportation	Identified Partners regionally and accordingly mapped our demand.	Reduced GHG emissions in primary transport
Localised warehousing and distribution solutions	Materials are shipped from Partner warehouses to 22 different warehouses present PAN India	Reduced GHG emissions from Logistics & Transport
Installation of leaner tower	Leaner tower has a frugal design with a smaller battery bank, no diesel genset and is of lesser height than a traditional macro tower.	Reduced use of material, energy efficient, lower carbon emissions and waste generation

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

Indus Towers has Business Continuity Plans with major focus on operational continuity such as ensuring optimal level of operations are being conducted during BCP, minimum time and prioritization of sites for recovery, clean-up of damaged structures and customer communication, data and system recovery etc. The company has identified different functions as critical enablers for business, for instance, Operations for sustenance/maintenance and smooth operations of existing tower sites across 18 telecom circles, Finance for efficient fund management for continued business operations and continued payments to the business partners and continued timely collections from the customers, Supply Chain Management for continued vendor management and robust warehouse management and Information Technology for continued operations of IT applications. The company has developed business continuity plans for each of these critical functions along with details of resumption of critical activities within the identified functions, detailed CMP (Crisis Management Plan) that covers roles and responsibilities and communication process flows.

Principle 7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
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At Indus Towers, we engage and collaborate with regulators and authorities on multiple issues very proactively. We do advocacy in a responsible manner on important issues/challenges for various regulatory policies governing our industry. The Company also works closely with industry associations and participates in stakeholder consultation to support the Government in framing policies in the areas of Scope Enhancement, Corporate Governance, Ease of Doing business and Social and Community Development. We work to ensure that our public policy positions complement or advance our sustainability and citizenship objectives.

Essential Indicators

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

Indus Towers Limited has affiliations with 6 trade and industry chambers/associations.

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

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Cellular Operators Association of India (COAI)	National
2	Digital Infrastructure Provider Association (DIPA)	National
3	Internet Service Provider Association of India (ISPAI)	National
4	Federation of Indian Chambers of Commerce and Industry (FICCI)	National
5	The Associated Chambers of Commerce of India (Assocham)	National
6	Broadband India Forum (BIF)	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.

NIL

Leadership Indicators

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

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain (Yes/ No)	Frequency of review by Board (Annually/ Half yearly/ quarterly/ others)	Web link, if available
1	Indian Right of Way (Amendment) Rules, 2022	<p>a) DoT issued RoW Rules, 2016 on 15th November, 2016. These rules are implemented across Pan India in all states and UTs.</p> <p>As IPIs were not added in above Rules, post regulatory policy advocacy, same was added in 2017 and IPIs were included in RoW rules to apply for Telecom Infrastructure on 22nd June, 2017.</p> <p>There was another amendment notified in 2021 to allow establishment of overground telegraph line over the immovable property.</p> <p>There was an amendment issued by DoT to main RoW Rules, 2016. These rules are called Indian Right of Way (amendment) 2022. Indus initiated alignment with Industry, government at central & state level for notification of the same by states. These rules have been adopted in more than 16 states and UTs.</p> <p>Further, there were additional amendments in main RoW Rules, 2016, in August, 2023 and these Rules are called "Indian Telegraph Right of Way (Amendment) Rules, 2023". These rules included provision for deployment of small cells on street furniture enabling faster rollout of 5G, intimation for deployment of infrastructure on private property etc.</p> <p>Currently Indus is working with all concerned states and central authorities for the implementation of these amended rules in states. Few states have already notified the rules. These amendments have saved huge money, litigation, taxes and time.</p>	Yes	Quarterly/ as and when required	https://gatishaktisanchar.gov.in/

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain (Yes/ No)	Frequency of review by Board (Annually/ Half yearly/ quarterly/ others)	Web link, if available
2	Policy notified by all states except Delhi (can be seen at individual state portal)	Delhi also notified policy on 1 st November, 2023 and same is available on Gati shakti portal.	Yes	Quarterly/ as and when required	https://gatishaktisanchar.gov.in/
3	MoP- Green open access policy -capping was reduced from 1 Mw to 100 Kw and no capping for captive use	MoP amended main Electricity Act, 2003 (36 of 2003) and notified Green open access policy on 04/11/ - called "Electricity (Promoting Renewable Energy Through Green Energy Open Access) Rules, 2022". As per the Rules "consumers who have contracted demand or sanctioned load of hundred kW and above shall be eligible to take power through Green Energy Open Access" Indus represented the matter w.r.t above Rules of capping of 100Kw for its type of business, with all concerned stakeholders directly and through association. Ministry of Power issued another amendment called the "Electricity (Promoting Renewable Energy Through Green Energy Open Access) (Second Amendment) Rules, 2023" allowing that "Provided that only consumers who have contracted demand or sanctioned load of Hundred kW or more, either through single connection or through multiple connections aggregating Hundred kW or more located in same electricity division of a distribution licensee, shall be eligible to take power through Green Energy Open Access. There shall be no limit of supply of power for the captive consumers taking power under Green Energy Open Access." This was major milestone achieved and hence Indus became eligible for getting connectivity to its sites under Green Open Access.	Yes	Quarterly/ as and when required	https://powermin.gov.in/
4	Ministry of Railways - IPIs were not allowed to deploy infrastructure directly	IPIs were not allowed to deploy telecom infrastructure directly on the property of Indian Railways, instead railtel use to deploy same with support from IPIs. This issue was escalated with DoT HQ and other concerned ministries. After many follow ups and meetings, Railways enabled same by bringing amendment in their internal policy with approval of Railway Board. IPIs are now allowed to deal with Railways directly and deploy telecom infrastructure on the property of railways without connecting with Railtel.	Yes	Quarterly/ as and when required	https://indianrailways.gov.in/railwayboard/

Principle 8 Businesses should promote inclusive growth and equitable development

Indus Towers considers organisational success and welfare of communities to be inter-dependent. The Company understands the importance of inclusive growth and being cognizant of this responsibility, the Company has been making constant efforts to ensure value creation and sustainable growth of communities. The Company is committed to taking pioneering and innovative initiatives to build a digital, more connected, inclusive, and sustainable India. Since digital connectivity can play a vital role in enhancing the socioeconomic well-being of a society, Indus along with its customers is proactively supporting the Indian government's flagship 'Digital India' initiative, in pursuit of digital inclusion of the rural population and ensuring last mile connectivity.

The CSR vision of Indus Towers aims at taking an active role and taking responsibility in transforming the lives of communities. As an important participant of the society, Indus along with all its employees remain committed to creating positive social change through base-level intervention and volunteering through personal social responsibility program. Being an industry leader, Indus believes that this position brings great responsibility and requires commitment towards society. Over the years, we have undertaken various CSR initiatives linked to sustainable development goals to bring transformational changes to the bottom-up community transformation and their overall structural change.

Essential Indicators

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

Not applicable

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

Not applicable

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

The CSR Projects at Indus Towers are implemented in collaboration with the NGO partners. Carefully chosen NGO Partners work in sync with Company's priorities on corporate social responsibility to deliver solutions meant to address the on-ground issues of the communities. All the NGO partners have their own redressal mechanism for the grievances of the community and they immediately address the grievances of the community as and when they arise. In addition to this they have regular interaction with the community to bring in more awareness about the program. Depending on the need of the CSR program, NGO partners meet different stakeholders including local village community, school authorities, panchayat, and related government stakeholders for smooth implementation of the program. The Company representatives are in regular touch with the NGO partners and keep themselves apprised of any key concern of the community.

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	36%	25%
Sourced directly from within India	99%	100%

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
Rural	0.3%
Semi-urban	1.2%
Urban	15.9%
Metropolitan	82.6%

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

For FY 2022-23, the data is not captured.

Note: Permanent Employees have been considered.

For non-field employees, we have considered the circle-based location and for field employees we have considered their district location for the purpose of calculation.

Leadership Indicators

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

Not applicable

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

S. No.	Aspirational District	Amount spent (In ₹)	
1	Andhra Pradesh	Kadapa	126,000
2	Andhra Pradesh	Parvathipuram Manyam	126,000
3	Andhra Pradesh	Visakapatnam	252,314
4	Andhra Pradesh	Vizianagaram	252,314
5	Arunachal Pradesh	Namsai	252,314
6	Assam	Udalguri	5,296,526
7	Assam	Baksa	6,109,849
8	Assam	Barpeta	369,027
9	Assam	Darrang	175,069
10	Assam	Dhubri	3,102,635
11	Assam	Goalpara	339,849
12	Assam	Hailakandi	29,178
13	Bihar	Aurangabad	252,314
14	Bihar	Banka	252,314
15	Bihar	Begusarai	5,465,492
16	Bihar	Gaya	252,314
17	Bihar	Muzaffarpur	252,314
18	Chhattisgarh	Kanker	252,314
19	Chhattisgarh	Kondagaon	252,314
20	Chhattisgarh	Mahasamund	252,314
21	Chhattisgarh	Rajnandgaon	252,314
22	Chhattisgarh	Sukma	252,314
23	Haryana	Mewat	6,323,032
24	Jammu and Kashmir	Baramulla	252,314
25	Jammu and Kashmir	Kupwara	252,314
26	Jharkhand	Bokaro	344,492
27	Jharkhand	Garhwa	63,000
28	Jharkhand	Pakur	2,995,121
29	Jharkhand	Ranchi	315,314
30	Madhya Pradesh	Singrauli	252,314
31	Madhya Pradesh	Vidisha	4,956,677
32	Maharashtra	Gadchiroli	252,314
33	Maharashtra	Osamanabad	252,314
34	Meghalaya	RiBhoi	398,205

S. No.	Aspirational District	Amount spent (In ₹)
35	Mizoram	29,178
36	Nagaland	29,178
37	Odisha	4,956,677
38	Odisha	5,937,481
39	Odisha	169,100
40	Rajasthan	4,956,677
41	Rajasthan	1,361,618
42	Tamil Nadu	63,000
43	Telangana	252,314
44	Telangana	281,492
45	Uttar Pradesh	252,314
46	Uttar Pradesh	252,314
47	Uttar Pradesh	252,314
48	Uttar Pradesh	252,314
49	Uttar Pradesh	252,314
50	Uttar Pradesh	252,314
51	Uttar Pradesh	252,314
52	Uttar Pradesh	252,314
53	Uttarakhand	806,966
54	Uttarakhand	252,314
Total		61,939,311

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

No

(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:

Not applicable

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

Not applicable

6. Details of beneficiaries of CSR projects -

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Satya Bharti School, Quality Support Program & TheTeacher App	545,161	86%
2	Gurushala	10,145,520	88%
3	Smart Agri Program	2,862,412	78%
4	Girl Child Education Program	132,220	100%
5	Project Nurture	583	100%
6	Digital Transformation Van Program	163,648	74%
7	Smart Classroom Program	90,928	70%
8	Indus Towers Scholarship Program for Disabled	1,804	100%
9	Scholarship Program for Higher Education	400	100%
10	Energy Access for Livelihood Opportunity	272	100%
11	Disaster Relief Initiative -Construction of Pre-Fabricated School/s	640	100%
12	Disaster Relief Initiative- Relief during Manipur Voilence	250	100%
13	Health Vans for benefit of community	887	80%
14	Digital Reading and Library in a classroom program - Setting up of Libraries	315,200	25%
15	Support to Paraplegic Rehabilitation Centre	424	100%
16	Pond Restoration and Rejuvenation Project	17,100	18%
17	Digital Health Kiosk	59,892	80%
		14,337,341	

Note:

- Education Infrastructure; Sanitation, Health & Hygiene- Sanitary Pad Program; Sanitation Program on Construction of Girls washroom in Govt. Schools; Construction of Medical & Therapy room for children with disability will have program outcomes next year and will be reported in next financial year.
- In Major programs, total number of people benefiting from CSR Projects includes three indirect beneficiaries, i.e. the benefits of each direct beneficiary percolate to three indirect beneficiaries.



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

Customers are pivotal to our success, and we believe in providing best-in-class services to them. As one of the leading digital infrastructure providers in India, we provide the most extensive network of telecom infrastructure and high-quality services to leading telecom operators in India. We realize the importance of having the right partner and the symbiotic relationship that we share with our customers. With a vision to strive for Customer Delight through continuous innovation, we provide reliable, innovative, cost-effective services built on our integrated infrastructure.

Essential Indicators

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

With a goal of providing best-in-class services to our customers, understanding their needs, resolving their queries and providing a suitable resolution to them is an utmost priority. There are several connects that we have with our customers on daily, weekly & monthly basis. At Head Office & Circle level, we have different types of planned governance meeting to address the customer queries/ updates which include business planning, billing issues, order book review among others.

Some of these connects are enumerated below:

- Corporate & circle leadership governance meetings with customer's corporate and circle leadership team respectively to discuss on the hygiene of the current business operations, new business initiatives and any differences.
- Corporate & circle Deployment team meeting with customer's Deployment & Planning team to discuss & resolve delivery related queries.
- O&M team meetings with customer's O&M team to resolve operations and maintenance issue.
- Energy team meetings to resolve diesel, electricity consumption and availability related issues.
- Customer query handling during BCP situations, special projects, or any other exigencies.

2. Turnover of products and/or services as a percentage of turnover from all products/ services that carry information about Environmental and social parameters relevant to the product, Safe and responsible usage and Recycling and/or safe disposal

Not applicable

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

NIL

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

Not applicable.

5. Does the entity have a framework/policy on cyber security and risks related to data privacy? If available, provide a web link to the policy.

Yes, the Company has a well-defined Information Security Policy which is accessible to all the employees on the Intranet. Additionally, we have ISO 27001:2022 (Information Security Management System) framework in place.

Indus Towers is committed to protecting its information assets from all identified threats, whether internal or external, deliberate or accidental, such that the confidentiality of information is maintained; integrity of information can be relied upon; availability of information is ensured; all legal, regulatory, statutory and contractual obligations are met and to ensuring continual improvement towards organization wide Information Security Management System. The policy sets a clear corporate direction and describes the security requirements for Indus information assets.

"Yes, we have ISO 27001:2022 (ISMS) framework in place.

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 the safety of products/services -

Not applicable.

7. Provide the following information relating to data breaches:

a) Number of instances of data breaches along with impact.

There was 1 (one) instance of data breach. There was a security incident reported wherein credentials of 4 number of users belonging to a standalone application (not linked to AD) got leaked. This finding was reported by

CLOUDSEK, our Brand Protection & Threat Advisory partner the same was also reported to CERT-In. Further, Instructions have also been shared with the vendors/partners for strengthening the security and there was no major impact.

b) Percentage of data breaches involving personally identifiable information of customers.

There have been no instances of data breaches involving personally identifiable information of customers.

Leadership Indicators

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

Details of all our products and services is available on our website [Smart City Project | Heterogeneous Network Product & Services | Multi-Functional Mobile Towers | Indus Towers](#).

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

Since our customers and their representatives visit our tower sites, we provide them with detailed guidelines on our safety practices through meetings and advisory mails. We ensure their compliance with our practices through active engagement with them. Awareness workshop had been conducted at circle level.

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

Providing consistent passive infra services to our customers is a critical service, and its continuity needs to be ensured even during catastrophes. We proactively inform our customers whenever there is a forecast on natural calamity like cyclone, storm etc. or any kind of local unrest that may lead to unavailability of passive infra. In all such situations we attempt to proactively follow our BCP and arrange alternative solutions. We endeavour to ensure that our customers can keep the end users connected.

Discontinuation of telecom services happens due to site dismantling; well established process as prior intimation given to customer so they can re-route their services either through optimization or new site planned with other IP/ own/ Indus to Indus relocation.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/ No/ Not applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

As per law, EMF guidelines need to be mentioned against each site which we are completely abiding by putting up stickers of EMF as per govt prescribed guidelines