

Ref: GIL/SE/AGM/2023-24/055

September 6, 2023

**The Secretary**  
**BSE Limited**  
Phiroze Jeejeebhoy Towers,  
25th Floor, Dalal Street,  
Fort, Mumbai 400023

**The Secretary**  
**National Stock Exchange of India Ltd.**  
Exchange Plaza, 5th Floor,  
Plot No. C/1, G Block,  
Bandra Kurla Complex,  
Bandra (East), Mumbai 400051

Scrip Code: 532775

Trading Symbol: GTLINFRA

Dear Sir/s,

**Sub: Business Responsibility and Sustainability Report for the financial year 2022-23**

---

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith the Business Responsibility and Sustainability Report for the financial year 2022-23.

This is for your information and record.

Thanking you,

Yours truly,  
For **GTL Infrastructure Limited**

**Nitesh A. Mhatre**  
**Company Secretary**

**Vikas Arora**  
**Whole-time Director**

**Encl. as above**

*Note: This letter is submitted electronically with BSE & NSE through their respective web-portals*

## ANNEXURE D TO DIRECTORS' REPORT

### BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

#### SECTION A: GENERAL DISCLOSURES

##### I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the Listed Entity	L74210MH2004PLC144367
2.	Name of the Listed Entity	GTL Infrastructure Limited
3.	Year of incorporation	February 4, 2004
4.	Registered office address	'Global Vision', 3rd Floor, Electronic Sadan-II, MIDC, TTC Industrial Area, Mahape, Navi Mumbai – 400710, Maharashtra, India.
5.	Corporate address	'Global Vision', 3rd Floor, Electronic Sadan-II, MIDC, TTC Industrial Area, Mahape, Navi Mumbai – 400710, Maharashtra, India.
6.	E-mail id	gilshares@gtlinfra.com
7.	Telephone	+91 22 68293500
8.	Website	<a href="http://www.gtlinfra.com/">http://www.gtlinfra.com/</a>
9.	Financial year for which reporting is being done	2022-23
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited and National Stock Exchange of India Limited
11.	Paid-up Capital	₹ 1,267,110 Lakhs
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Whole-time Director – Mr. Vikas Arora Email id – <a href="mailto:gilshares@gtlinfra.com">gilshares@gtlinfra.com</a> Telephone Number – +91 22 68293500
13.	Reporting boundary – Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Disclosure made in this report are on a standalone basis.

##### II. Products/services

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

Sr. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Providing Telecom Towers on shared basis to multiple telecom operators	To build, own, operate and maintain passive telecom infrastructure sites capable of hosting active network components of various technologies of multiple telecom operators.	100%

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

Sr. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Providing Telecom Towers on shared basis to multiple telecom operators	619	100%

##### III. Operations

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

Location	Number of plants	Number of offices	Total
National	Presence across 22 telecom circles in India serving all the major telecom operators	21	21
International	Nil. At present, the Company is serving only the Indian market.		

17. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	PAN India
International (No. of Countries)	Nil

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

The customers of the Company are Telecom operators in India namely Bharti Airtel Limited, Bharat Sanchar Nigam Limited, Reliance Jio Infocomm Limited & Vodafone Idea Limited.

## IV. Employees

18. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>EMPLOYEES</b>						
1.	Permanent (D)	271	247	91%	24	9%
2.	Other than Permanent (E)	305	286	94%	19	6%
<b>3.</b>	<b>Total employees (D + E)</b>	<b>576</b>	<b>533</b>	<b>94%</b>	<b>43</b>	<b>6%</b>
<b>WORKERS</b>						
4.	Permanent (F)	3	3	100%	0	0%
5.	Other than Permanent (G)	213	210	99%	3	1%
<b>6.</b>	<b>Total workers (F + G)</b>	<b>216</b>	<b>213</b>	<b>99%</b>	<b>3</b>	<b>1%</b>

b. Differently abled Employees and workers:

Sr. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)	1	1	100%	0	0%
2.	Other than Permanent (E)	1	1	100%	0	0%
<b>3.</b>	<b>Total differently abled employees (D + E)</b>	<b>2</b>	<b>2</b>	<b>100%</b>	<b>0</b>	<b>0%</b>
<b>DIFFERENTLY ABLED WORKERS</b>						
4.	Permanent (F)	–	–	–	–	–
5.	Other than permanent (G)	–	–	–	–	–
<b>6.</b>	<b>Total differentlyabled workers (F + G)</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>	<b>–</b>

19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	7	1	14%
Key Management Personnel	3	0	–

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

	FY 22–23 (Turnover rate in current FY)			FY 21–22 (Turnover rate in previous FY)			FY 20–21 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	9.3%	0.7%	10.0%	4.3%	1.6%	5.9%	9.1%	2.0%	11.0%
Permanent Workers	16.5%	0.7%	17.2%	17.8%	1.3%	19.1%	17.2%	1.3%	18.5%

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

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

The Company does not have Holding or Subsidiary or Associate or Joint Venture Company.

## VI. CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: No  
(Not applicable in view of losses incurred by the company)
- (i) Turnover (in ₹) 145,786 Lakhs
- (iii) Net worth (in ₹) (454,074) Lakhs

## VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)  (If Yes, then provide web-link for grievance redress policy)	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
		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	Not Specific	Nil	Nil	However Senior Leadership guides CSR team & Operations on community engagement	Nil	Nil	However Senior Leadership guides CSR team & Operations on community engagement
Investors (other than shareholders)	Yes <a href="https://www.gtlinfra.com/investors/investor-services/">https://www.gtlinfra.com/investors/investor-services/</a>	Nil	Nil	–	Nil	Nil	–
Shareholders	Yes <a href="https://www.gtlinfra.com/investors/investor-services/">https://www.gtlinfra.com/investors/investor-services/</a>	Nil	Nil	–	Nil	Nil	–
Employees and workers	Yes <a href="https://www.gtlinfra.com/corporate-governance/">https://www.gtlinfra.com/corporate-governance/</a>	Nil	Nil	We have a Whistle Blower Policy, Policy on Vigilance Mechanism, Anti-Harassment and POSH	Nil	Nil	We have a Whistle Blower Policy, Policy on Vigilance Mechanism, Anti-Harassment and POSH
Customers	Yes	Refer Note I					
Value Chain Partners	Yes	Refer Note II					
Other (Landlords)	Yes	Refer Note III					

**Note I:** We regularly connect with our customers through Operating Review & Governance Meetings both at Corporate and Circle level to understand their requirements, issues / complaints and periodically deliberate on issues covering Energy aspects such as Diesel, Electricity Consumption and network improvisation opportunities. Resolution to complaints is an ongoing process and service level agreements exists with customers.

**Note II:** Notices on Websites are published regularly with a redressal at [scmmahape@gtlinfra.com](mailto:scmmahape@gtlinfra.com)

**Note III:** Shut down / exit of 14 telecom customers resulted into abandonment of more than 14,000 towers of the Company by such discontinued telecom customers, making such towers unoccupied. Such discontinuing telecom customers did not make any payment of their contractual dues to the Company, including rent payable to landlords, which are pass through payments for the Company. The Company has requested Edelweiss Asset Reconstruction Company Limited ("EARC") being Monitoring Institution, for making payments due to the landlords of the unoccupied sites, however, the same is yet to be approved. Further, resolution plans were submitted by the Company included payment of rent to landowners. However, none of the resolution proposals were considered by the lenders. Due to non-receipt of the rental amounts from the discontinuing operators as per contractual arrangement, pending approval of payment requests of the Company with the Monitoring Institution and non-resolution of issue of unpaid liabilities towards unoccupied towers, the rentals to landlords for those unoccupied sites remained unpaid. As a result, such landlords initiated legal actions against the Company and its directors / officials. The no. of legal notices received by the Company from various landlords are 1,546 nos. in FY 2021–2022 and 1,109 nos. in FY 2022–2023 respectively. The Company has responded to majority of such legal notices and as on March 31, 2023, 342 number of matters have been filed by various landlords before various judicial authorities and Company is defending the same.

24. 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

Sr. 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.	Energy Emissions	Opportunity and Risk	<p><b>Opportunity:</b> To reduce dependency on Fossil Fuels and tap cleaner &amp; lower cost of Energy resources</p> <p><b>Risk:</b> Dependency on continuous availability of Energy. Primary Sources through Electricity and Diesel Generation causes GHG emission Risk.</p>	We are continuously working towards sequential reduction in energy from diesel and shift to grid electricity wherever possible. This will lead to reduce emission due to lower Diesel burn.	We encourage replacement of Diesel consumption by increasing Electricity connections and also work towards enhancing quality and availability of electricity. This also helps in reducing Cost of Operations.
2.	Human Capital	Opportunity and Risk	<p><b>Opportunity:</b> Well developed and implemented HR Practices will lead to better governance and increased productivity. Retention of talent. Motivated and skilled employees will enable better service delivery and enhanced customer satisfaction.</p> <p><b>Risk:</b> High Attrition, Poor Service Delivery, Risk of Image and Reputation, etc.</p>	Our structured framework offers training and competency development programs to employees. The focus has been on technical training to ensure our technical staff are upto date on the latest technologies. Employee Engagement through goal setting, reviews & events help promote diversity & inclusion.	<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>Efficient operations; ownership of our people toward company's objectives</li> <li>SLA penalty savings</li> </ul> <p><b>Negative</b></p> <ul style="list-style-type: none"> <li>Compliance issues with labour laws and regulations may lead to disruption and penalties</li> </ul> <p><b>Attrition</b></p> <ul style="list-style-type: none"> <li>Ability to attract talent and Company Image would be hampered leading to increased cost of hiring.</li> </ul>
3.	Health and Safety	Opportunity and Risk	<p><b>Opportunity:</b></p> <ul style="list-style-type: none"> <li>Reduced Absenteeism</li> <li>Optimum Productivity</li> </ul> <p><b>Risks:</b></p> <ul style="list-style-type: none"> <li>Health issues faced by employees on and off duty can cause disruptions and affect our quality of services to customer</li> <li>It will lead to lower confidence from customers on our services affecting the business prospects.</li> </ul>	<ul style="list-style-type: none"> <li>Health insurance and term insurance coverage is ensured for all manpower.</li> <li>Health awareness from doctor consultation.</li> <li>Personal Accident Policy cover for Employees.</li> </ul>	<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>Efficient operations</li> </ul> <p><b>Negative</b></p> <ul style="list-style-type: none"> <li>Reduced man days due to illness / accidents leading to higher cost of delivery</li> <li>Retention issues that increases wage cost</li> </ul>

Sr. 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)
4.	Waste Management	Opportunity and Risk	<p><b>Opportunity:</b></p> <ul style="list-style-type: none"> <li>Reduction in waste generation and disposal through authorised scrap dealers</li> </ul> <p><b>Risk:</b></p> <ul style="list-style-type: none"> <li>Adverse actions for non-compliance in case of waste disposal</li> </ul>	<ul style="list-style-type: none"> <li>Disposal of E-Waste/Hazardous Waste/ General Waste etc. is being done through authorized/ approved recyclers.</li> <li>Wherever possible, useful life of assets is increased through refurbishing and repairs to minimize waste.</li> </ul>	<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>Savings in the form of enhanced useful life of equipment and reduced waste generation.</li> </ul> <p><b>Negative</b></p> <ul style="list-style-type: none"> <li>Higher replacement cost of equipment.</li> <li>Mishandling of hazardous waste leading to penalties.</li> </ul>

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	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)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
	Policies mandated under the Companies Act, 2013 ("Act") and SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015 ("Listing Regulations") are approved by the Board and other policies are approved by the Whole-time Director / Functional Heads of the Company as appropriate from time to time.								
c. Web Link of the Policies, if available	Policies mandated to be displayed on website of the Company as per the Act and Listing Regulations are displayed at <a href="http://www.gtlinfra.com/investors">http://www.gtlinfra.com/investors</a>								
2. Whether the entity has translated the policy into procedures. (Yes / No)	The Company endeavors to implement and translate all the policies into procedures and practices.								
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	The Company encourages its value chain partners to uphold standards of ethics, fairness and transparency in all their dealings with the Company.								
4. Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The policies are based on NGRBC, in addition to confirmation of the spirit of the national and international standards.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>The Company is in process of meaningfully defining specific commitments, goals and targets to integrate ESG priorities in its operations. For Example, In FY 2022-2023, 69 sites were electrified resulting in reduction of Diesel consumption by 46 lakh litres vis-à-vis its previous financial year.</p> <p>In FY 2021-2022, 157 sites were electrified resulting in reduction of Diesel consumption by 32 lakh litres vis-à-vis its previous financial year</p>								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Not applicable as the Company is in process of meaningfully defining specific commitments, goals and targets to integrate ESG priorities in its operations.								
<b>Governance, leadership and oversight</b>									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	<p>At GTL Infrastructure, we are guided by our vision "To be India's most efficient and environment friendly Telecom Tower Company".</p> <p>In pursuit of sustainability, we are adding 5G tenancies on our towers and engaging with lenders for right sizing of debt.</p> <p>Through efficient usage of energy resources, governance and electrification of sites, the Company has been reducing its dependence on fossil fuels while maintaining the telecom sites on a 24x7 basis. In FY24 we continue to work on ESG.</p> <p>The Company and its Employees support social projects carried out by Global Foundation in the areas of Community Development, Health,</p>								

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
	Education and Disabilities by non-financial means. The Company works round the clock so that communities living around our towers enjoy access to communications. Thrust on Corporate Governance in our operations ensures compliances and appropriate Corporate Conduct. Specific details on Corporate Governance Report and Corporate Social Responsibility are mentioned in the MDA section of the Annual Report.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Whole-Time Director : Mr. Vikas Arora Email id – gilshares@gtlinfra.com Telephone Number – +91 22 68293500 (DIN: 09785527)								
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.	No, however Senior Leadership Team works towards sustainability and drives the agenda in Operations.								

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director /Committee of the Board / Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)																										
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9																		
Performance against above policies and follow up action	The Whole-time Director and the Functional Heads oversee implementation of the policies under guidance of the Board of Directors, wherever required.									Annually																										
Compliance with statutory requirements of relevance to the principles, and,rectification of any non-compliances	The compliance with the statutory requirements is monitored on a regular basis by 1. Management 2. Board of Directors									The compliance is monitored on quarterly basis.																										
11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.										<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #e1f5fe;"> <th>P 1</th> <th>P 2</th> <th>P 3</th> <th>P 4</th> <th>P 5</th> <th>P 6</th> <th>P 7</th> <th>P 8</th> <th>P 9</th> </tr> </thead> <tbody> <tr> <td colspan="9" style="text-align: center;">The working of all the policies is monitored internally.</td> </tr> </tbody> </table>									P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	The working of all the policies is monitored internally.								
P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9																												
The working of all the policies is monitored internally.																																				

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

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

### PRINCIPLE 1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

#### Essential Indicators

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

Segment	Total Number of training and awareness programmes held	Topic/principles covered under the training and its impact	Percentage of persons in respective category covered by the awareness programmes
Board of Directors	4	Corporate Governance updates	100%
Key Managerial Personnel		Risk Management updates	
Employees other than BoD and KMPs	14	GTL Infrastructure through its monthly induction program enrolls employees into the system. On the job training and technical training are core trainings that are conducted across all locations PAN India. Besides this we also conduct statutory training which are mandatory.	62%

*Our management team also visits branches/circles making people aware of the Code of Conduct, Anti-Harassment policy, Whistle blower policy, Ethics policy & the Prevention of Sexual Harassment (POSH policy). Furthermore, fire drills and safety awareness trainings are conducted by Administration Department from time to time.*

2. Details of fines/ penalties/ punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors/ KMPs) with regulators/ lawenforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):  
Nil
3. Of the instances disclosed in Question 2 above, details of the Appeal / Revision preferred in cases where monetary or non-monetary action has been appealed.  
Not Applicable
4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.  
Prevention & investigation of Corruption & bribery in the company is taken care of through the Whistle Blower policy & Ethical Practices policy. The Ethical Practices Policy is available on the intranet of the company and the Code of Conduct and Whistle Blower Policy of the company is available on the website of the company at <http://www.gtlinfra.com/investors>.
5. Number of Directors/KMPs/employees/workers against whom disciplinary action wastaken by any law enforcement agency for the charges of bribery/ corruption:  
Nil
6. Details of complaints with regard to conflict of interest:  
Nil
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

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

### Essential Indicators

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

₹ in Lakhs

	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year	Details of improvements in environmental and social impacts
R&D	NA	NA	NA
Capex	₹ 3,616 (41% of Total Capex for the year)	₹ 4,613 (54% of Total Capex for the year)	During the year the Company has made capex investment on energy conservation initiatives through deployment of battery banks and electrification of sites.
	<i>(Capex utilization for Diesel reduction x 100/ Total Capex)</i>		69 sites were Electrified in financial year 2022-2023 thereby reducing the diesel consumption.

2. a. Does the entity have procedures in place for sustainable sourcing?  
Yes, GTL Infrastructure Ltd. has emphasis on sustainable sourcing. We source Class A products like Diesel Generators, Battery Banks, SMPS, etc. evaluated on the basis of the Product Lifecycle, efficiency in usage of energy resources, emissions and responsible waste management.  
Efficiency of products on the basis of Energy Consumption is done on a regular basis. On the vendor front, we consciously engage local service providers who are in the nature of Medium and Small-Scale entrepreneurs and try to give business opportunities to the unorganized sector who are attuned to ESG practices.
- c. If yes, what percentage of inputs were sourced sustainably?  
Nearly 90%.
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, and electronic products in our business operations. Batteries are classified as hazardous waste; whereas SMPS as other non-hazardous waste.  
Material deployment from warehouse to sites gets completed through the process of Material Request Note (MRN). 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 In-house technical team i.e. TRC (Testing & Repair Centre) followed by its validation (item-wise) by a Subject Matter Expert for



declaring it as either repairable or scrap. Items parked in repairable bucket are redeployed to field post completion of repair at SME Workshop. SRN Material identified as scrap by SME/TRC are further assessed by respective Circle team.

Disposal of assets falling under pollution control board norms buckets including E- Waste/Hazardous Waste/ General Waste etc. is being done through advertisement in various publications wherein only authorized/ approved recyclers are allowed to participate in inspection 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 Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

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

Our people are our core assets. Their skills, responsibilities they take, their achievements and commitment are our biggest strength. We encourage our employees to discover and realize their true potential. Acquiring diverse experiences, accomplishing challenging tasks and continually learning and upskilling is enabling them to deliver their best in all situations.

By identifying, developing and nurturing quality talent at every stage of the employee lifecycle, we are empowering them to become future ready and build rewarding careers.

Keeping employee wellbeing foremost, we have embraced the post-pandemic way of life and work.

### Essential Indicators

1. a. Details of measures for the well-being of employees: FY 2022-23

% of employees covered by											
Category	Total(A)	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)
<b>Permanent employees</b>											
Male	247	247	100%	247	100%	0	0%	247	100%	Not Available	
Female	24	24	100%	24	100%	24	100%	0	0%	Not Available	
<b>Total</b>	<b>271</b>	<b>271</b>		<b>271</b>		<b>24</b>		<b>247</b>		<b>Not Available</b>	
<b>Other than Permanent employees</b>											
Male	286	286	100%	286	100%	0	0%	286	100%	Not Available	
Female	19	19	100%	19	100%	19	100%	0	0%	Not Available	
<b>Total</b>	<b>305</b>	<b>305</b>		<b>305</b>		<b>19</b>		<b>286</b>		<b>Not Available</b>	

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

% of workers covered by											
Category	Total (A)	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)
<b>Permanent workers</b>											
Male	3	3	100%	3	100%	0	0%	3	100%	Not Available	
Female	0	0	0%	0	0%	0	0%	0	0%	Not Available	
<b>Total</b>	<b>3</b>	<b>3</b>		<b>3</b>		<b>0</b>		<b>3</b>		<b>Not Available</b>	
<b>Other than Permanent workers</b>											
Male	210	210	100%	210	100%	0	0%	210	100%	Not Available	
Female	3	3	100%	3	100%	3	100%	0	0%	Not Available	
<b>Total</b>	<b>213</b>	<b>213</b>		<b>213</b>		<b>3</b>		<b>210</b>		<b>Not Available</b>	

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

Benefits	FY 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	3.13%	51.85%	Y	4.60%	54.65%	Y
Others – please Specify	No	No	No	No	No	No

## 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 ensure all people in the organization including differently abled work & stay comfortable. We are gradually working towards making our infrastructure and facilities differently abled friendly.

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

The company practices features of Equal Opportunities to all its employees and prospective hirers.

## 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	—	—	—	—
Female	100%	100%	100%	100%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

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

	(If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes
Other than Permanent Workers	Yes
Permanent Employees	Yes
Other than Permanent Employees	Yes

The mechanism & process is detailed out in all of our policies that helped employees to address their grievances. For POSH related grievances there is the structured four-member committee which any employee can write to for complaint / redressal. For all other grievances there is an anti-harassment policy which consist of a committee headed by the Whole-Time Director. Employees can approach this committee at any point of time to address their grievances. Alternatively, employees can also approach Audit Committee for their grievances.

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

NA. Though none of the employees of GTL Infrastructure Limited are part of any trade union through our own ways, we encourage employees to communicate matters related to employment policies & procedures. In this way we respect the rights of our employees which also helps us to gain constructive feedback on regular basis. Several HR & Senior Level Team interactions also take place both formally and informally.

Category	FY 2022–23 (Current Financial Year)			FY 2021–22 (Previous Financial Year)		
	Total employees/workers in respective category (A)	No. of employees/workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees/workers in respective category (C)	No. of Employees/workers in respective category, who are part of association(s) or Union (D)	% (D / C)
<b>Total Permanent Employees</b>	No	No	No	No	No	No
– Male	No	No	No	No	No	No
– Female	No	No	No	No	No	No
<b>Total Permanent Workers</b>	No	No	No	No	No	No
– Male	No	No	No	No	No	No
– Female	No	No	No	No	No	No

## 8. Details of training given to employees and workers:

Category	FY 2022–23 Current Financial Year					FY 2021–22 Previous Financial Year				
	Total(A)	On Health and safety measures		On Skill upgradation		Total(D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Male	533	58	11%	74	14%	465	87	19%	73	16%
Female	43	22	51%	0	0%	35	23	66%	0	0%
<b>Total</b>	<b>576</b>	<b>80</b>	<b>14%</b>	<b>74</b>	<b>13%</b>	<b>500</b>	<b>110</b>	<b>22%</b>	<b>73</b>	<b>14.6%</b>
<b>Workers</b>										
Male	213	37	17%	92	43%	169	40	4.2%	93	55%
Female	3	3	100%	0	0%	3	3	100%	0	0%
<b>Total</b>	<b>216</b>	<b>40</b>	<b>—</b>	<b>92</b>	<b>42%</b>	<b>172</b>	<b>43</b>	<b>—</b>	<b>93</b>	<b>54%</b>

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

On annual basis, performance of all the employees is reviewed & based on the same, movement/transfer/promotions are effected. 100% of eligible employees are covered under this review.

10. Health and safety management system:

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

Yes. The Company endeavors to provide a safe and healthy working environment and conditions to its employees. Safety drills and training sessions are conducted. Visiting medico professional provides guidance and consulting for good health. Employees are also covered under Group Personal Accident and Mediclaim Policies. A Comprehensive Safety Management system will be further developed.

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

All efforts are maintained to keep our offices free of work-related hazards. Inspections are carried out by administration department covering fire and electrical, water etc.

For the tower sites, there is a 2 Tier structure of Technicians and Cluster Managers who carry out routine visits for Preventive Maintenance. Any risk concern, and hazards when reported is attended for rectification to ensure site and people safety. These visits are also followed up by internal audit team to ensure compliance.

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

We have a feedback mechanism where employees can directly write to management / admin to report work related hazards which are immediately corrected. Circle Admin/ HR works to minimize work related hazards at offices.

For sites (towers) related issues Operations and Maintenance team is responsible and can be approached for escalation at Regional and Corporate level.

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

Yes, we have tie up with hospital & we also have a contract with Mediclaim company to ensure our employees are taken care of on regular basis.

There is a senior doctor from a premium hospital and his services are available to all the employees in Person/ Phone/ Video consultation. The doctor consults and guides the employees and their family members for health care services, whenever required.

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

Safety Incident/Number	Category	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	No	No
	Workers	No	No
Total recordable work-related injuries	Employees	No	No
	Workers	No	No
No. of fatalities	Employees	No	No
	Workers	No	No
High consequence work-related injury or ill-health (excluding fatalities)	Employees	No	No
	Workers	No	No

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

- Infrastructure has been created to ensure safe & healthy work place.
- Regular checks are made by a full-fledged Administration & Infra Department.
- Necessary rectification is done if required.
- Regular pest controls, fire & safety drills, fumigation is conducted on office premises.
- Health & medical centre is created out of large office premises with all first aid facilities being made available.
- Doctor from reputed hospital available to all employees for consultation.

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

	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	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	No	No	No	No	No	No
Health & Safety	No	No	No	No	No	No

14. Assessments for the year:

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
Health and safety practices	100% of offices were covered in internal assessment.
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.

We always work towards creating a safe workplace wherein our employees feel confident and safe to work. Well equipped infrastructure and ergonomics are provided to employees across all locations. Major activities carried out at our offices considering employee health, safety and hygiene are as mentioned hereunder.

- a. Regular maintenance of Fire & Safety equipments (including Compliance aspect)
- b. First Aid Emergency Kits are accessible at all offices.
- c. For Safe Drinking Water RO purification Plant is installed at our Mahape office
- d. Workplace sanitization is carried on regular basis

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

The Company’s Towers provide access to communication to communities.

We work 24x7 so that people living around our Towers stay connected with their near ones and have access to essential services.

We continue to build and nurture strong relationships with our stakeholders that include 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 involves identification and classification of priority groups on the basis of –
  - where stakeholders have any interdependence on Company’s services and upon whom it is dependent for its operations.
  - where we have contractual, operational or a moral concern
2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

<b>Stakeholder group</b>	<b>Whether identified as vulnerable &amp; marginalized group (Yes/No)</b>	<b>Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community meetings, Notice board, Website), Other</b>	<b>Frequency of engagement (Annually/ half-yearly/ quarterly/ others – please specify)</b>	<b>Purpose and scope of engagement including key topics and concerns raised during such engagement</b>
Employees	No	<ul style="list-style-type: none"> <li>• Engagement Activities</li> <li>• Communication through emails and letters</li> <li>• Leadership interactions</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>• Goal Setting</li> <li>• Performance review</li> <li>• Career development</li> <li>• Employee benefits</li> <li>• Equal opportunities</li> <li>• Recognition</li> <li>• Learning and development</li> <li>• Safety and well–being</li> <li>• Policy awareness</li> </ul>
Customers	No	<ul style="list-style-type: none"> <li>• Emails and Phone calls</li> <li>• Governance Meetings</li> <li>• Video Conferences</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>• Network Uptime performance</li> <li>• Reviews &amp; Reconciliations</li> <li>• Customer queries feedback</li> <li>• Query Resolution</li> <li>• Mapping of new sites</li> </ul>
Shareholders	No	<ul style="list-style-type: none"> <li>• Annual General Meeting</li> <li>• Website updates</li> <li>• Stock Exchange releases</li> </ul>	Annual / Ongoing	<ul style="list-style-type: none"> <li>• Information on financial and operational performance of the company</li> <li>• Q&amp;A</li> <li>• Disclosures of material events</li> </ul>
Regulatory Bodies	No	<ul style="list-style-type: none"> <li>• Emails/Letters</li> <li>• In Person meetings</li> </ul>	Need based	Feedback on regulations and policy matters concerning our business operations.
Suppliers	No	<ul style="list-style-type: none"> <li>• Emails/Letters</li> <li>• Supplier visits and Company’s visits to supplier locations</li> <li>• Website updates</li> <li>• Advertisements</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>• Sourcing</li> <li>• Query resolution</li> <li>• Supplier performance review</li> </ul>
Communities	Yes	<ul style="list-style-type: none"> <li>• Personal interactions</li> </ul>	Need based	<ul style="list-style-type: none"> <li>• Grievance handling</li> <li>• Voluntary support through Global foundation</li> </ul>

## PRINCIPLE 5: Businesses should respect and promote human rights

Over the years, the Company philosophy has been to build trust, respect and fairness across all levels in the work force. Respecting human rights of employees & all stake holders is a priority to the company. We strive to be compliant in relation to all local labour laws, ESIC and Provident Fund. The company has policies which includes POSH policy & Anti-Harassment policy which ensures human rights are protected within the organisation. The process around these policies ensures employees have a right to voice any grievance / harassment in the work place. There is a structured Grievance Handling Process in place.

### 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 2022-23 Current Financial Year			FY 2021-22 Previous Financial Year		
	Total (A)	No. of employees/ workers covered (B)	% (B / A)	Total (C)	No. of employees/ workers covered (D)	% (D / C)
<b>Employees</b>						
Permanent	271	243	90%	258	232	90%
Other than permanent	305	274	90%	242	217	90%
<b>Total Employees</b>	<b>576</b>	<b>517</b>	<b>90%</b>	<b>500</b>	<b>449</b>	<b>90%</b>
<b>Workers</b>						
Permanent	3	3	100%	3	3	100%
Other than permanent	213	191	90%	169	152	90%
<b>Total Workers</b>	<b>216</b>	<b>194</b>	<b>90%</b>	<b>172</b>	<b>155</b>	<b>90%</b>

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

Category	FY 2022-23 Current Financial Year				FY 2021-22 Previous Financial Year					
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No.(B)	% (B/A)	No.(C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
<b>Permanent</b>										
Male	247	0	0%	247	100%	235	1	0.43%	234	99.57%
Female	24	0	0%	24	100%	23	0	0%	23	100%
<b>Other than Permanent</b>										
Male	286	9	3.14%	277	96.85%	230	15	6.52%	215	93.48%
Female	19	2	10.52%	17	89.47%	12	2	16.67%	10	83.33%
<b>Workers</b>										
<b>Permanent</b>										
Male	3	0	0%	3	100%	3	0	0%	3	100%
Female	0	0	0%	0	0%	0	0	0%	0	0%
<b>Other than Permanent</b>										
Male	210	21	10%	189	90%	166	15	9.04%	151	90.96%
Female	3	1	33.33%	2	66.67%	3	0	0%	3	100%

3. Details of remuneration/salary/wages, in the following format:

	Male		Female	
	Number	Median remuneration/ salary/wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	Please refer Director's Report			
Key Managerial Personnel	Please refer Director's Report			
Employees other than BoD and KMP	530	5,09,846	43	4,90,838
Workers	160	3,14,757	3	2,79,254

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, Anti-Harassment, Grievance & also through POSH committee.

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

We have an open-door policy to address grievances related to our employees. Through the grievance/ anti-harassment & POSH policy employees can speak & address their grievance by speaking through their HoD or approach directly to the Committees for support.

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

	FY 2022–23 Current Financial Year			FY 2021–22 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour/ Involuntary Labour	0	0	NA	0	0	NA
Wages	65	0	NA	24	0	NA
Other human Rights related issues	0	0	NA	0	0	NA

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

The policy is designed in such way that the complainant as well as the complaint is kept confidential at committee level itself. This ensures that there is no discrimination or harassment to the employee.

## 8. Do human rights requirements form part of your business agreements and contracts?

GTL Infrastructure is working sequentially towards covering Human Rights Aspects in its contracts and agreements

## 9. Assessments for the year:

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

## 10. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.

No significant risk as all statutory compliances are maintained in the inspected areas

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

The Company's business has a dependence on availability of electricity on 24x7 basis. To achieve this, back up power is provided from Battery Banks and Diesel generators at sites for the telecom networks to remain live in the event of electricity grid failure, force majeure events etc.

As a part of our endeavour for cleaner environment, the Company has been consistently working towards reducing its energy dependence on Diesel. Several measures have been adopted like installation of free cooling devices, battery augmentation, electrification of sites, working with electricity providers to improve the electricity availability etc.

Waste management is also done in a responsible manner.

**Essential Indicators**

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

Parameter	FY 2022–23 (Current Financial Year)	FY 2021–22 (Previous Financial Year)
Total electricity consumption (A)	12,64,813	12,56,638
Total fuel consumption (B)	5,48,933	7,26,846
Energy consumption through other sources (C)	–	–
<b>Total energy consumption (A+B+C)</b>	<b>18,13,746</b>	<b>19,83,484</b>
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	0.00012441	0.00013560
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) : N If yes, name of the external agency. Not Applicable

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, in the following format:

Water is used in office premises for drinking and cleaning purposes. Water is supplied by the Municipal Corporation in the respective offices.

Parameter	FY 2022–23 (Current Financial Year)	FY 2021–22 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	–	–
(ii) Groundwater	–	–
(iii) Third party water	10293	4538
(iv) Seawater / desalinated water	–	–
(v) Others	–	–
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	10293	4538
Total volume of water consumption (in kilolitres)	10293	4538
Water intensity per rupee of turnover (Water consumed / turnover)*	0.000706037	0.000310242
Water 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. Not Applicable

\* The company does not measure the quantity of water discharged

4. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.  
Given the nature of our operations, this question is not applicable to us.
5. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

Parameter	Please specify unit	FY 2022–23 (Current Financial Year)	FY 2021–22 (Previous Financial Year)
NOx (*)	Metric Ton	220.23	291.60
SOx	–	–	–
Particulate matter (PM)	Metric Ton	14.06	18.61
Persistent organic pollutants (POP)	–	–	–
Volatile organic compounds (VOC)	–	–	–
Hazardous air pollutants (HAP)	–	–	–
Others – (please specify) – CO	Metric Ton	164.00	217.15

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N); N If yes, name of the external agency. No (\*) NOx data also includes HC

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

Parameter	Unit	FY 2022–23 (Current Financial Year)	FY 2021–22 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 Equivalent	38,416	50,866
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 Equivalent	2,13,508	2,12,127
Total Scope 1 and Scope 2 emissions per rupee of Turnover	Metric tonnes of CO2 Equivalent	0.00001728	0.00001798
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	–	–	–

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

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

At GTL Infrastructure Ltd., we firmly believe in our responsibility towards the environment. We undertook various viable techno-commercial initiatives to reduce the carbon emissions.

**Green Sites** – We are continuously working towards converting our regular diesel filling sites into Green Sites where diesel consumption is less than 100 litres per quarter. As of FY–2021–22 there were 2,313 green sites which increased to 2,547 sites in FY–2022–23.

(on case–to–case basis in events of prolonged EB cut or in force majeure events a small quantity of diesel may be used to power on Telecom Networks)

**Natural Cooling** – installed FCU (Free Cooling Units) at our sites to overcome the dependability on Air–conditioners run where ambient temperature compliments the working of equipments.

**Advance battery bank solutions** – We have introduced VRLA Based HTC (High Temperature Cyclic) batteries, to optimise energy consumption.

We have taken initiative to optimise the power plant performance at site by installing the single power plant instead of multiple power plant Telecom Operator–wise, thus reducing the unnecessary DG run hours and utilizes the maximum battery backup, thus reducing the diesel consumption.

**High Electricity Availability:** We undertake phase conversion and feeder conversion projects which benefit us to have higher EB availability, especially in Urban and Rural areas. This results in reduction of Diesel Generator run hours.

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

Parameter	FY 2022–23 (Current Financial Year)	FY 2021–22 (Previous Financial Year)
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	–	–
E–waste (B)	–	–
Bio–medical waste (C)	NA	NA
Construction and demolition waste (D)	–	–
Battery waste (E) <sup>#</sup>	1560	1600
Radioactive waste (F)	NA	NA
Other Hazardous waste. Please specify, if any. (G)	NA	NA
Other Non–hazardous waste generated (H). Please specify, if any. <sup>##</sup> (Break–up by composition i.e. by materials relevant to the sector)	9.19	24.68
<b>Total (A + B + C + D + E + F + G + H)</b>	<b>1569.19</b>	<b>1624.68</b>
<b>For each category of waste generated, total waste recovered through recycling, re–using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	1,569.19	1,624.68
(ii) Re–used	–	–
(iii) Other recovery operations	–	–
<b>Total</b>	<b>1,569.19</b>	<b>1,624.68</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	Not Applicable	
(ii) Landfilling		
(iii) Other disposal operations		
<b>Total</b>		

**Note:** Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. Not Applicable

<sup>#</sup> Battery waste are battery banks used at sites

<sup>##</sup> Other non–hazardous waste are paper based wastages generated from normal operations

9. 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.

We consume batteries, and electronic products in our business operations. Batteries are classified as hazardous waste; whereas SMPS as other non– hazardous waste.

The cycle of material deployment to retrieval and waste is handled in a systematic process. Material deployment from warehouse to sites gets completed through the process of Material Request Note (MRN). The retrieval of material from sites to warehouse is initiated post completion of its shelf life through the process of Site Return Note (SRN).

Post receipt of material at warehouse, it flows into the process of Health Assessment which is done by In–house Testing & Repair Centre followed by its validation item wise by a Subject Matter Expert for declaring it as either repairable / reusable (with acceptable performance) or scrap.



Items classified as repairable are redeployed for extended life. SRN Material identified as scrap is disposed-off through authorized recyclers / OEMs taking back such material for responsible waste management.

10. 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:

Sr. 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.
---------	--------------------------------	--------------------	--

NIL

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

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

12. 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, the company conducts its operations in accordance with applicable rules and regulations.

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

#### Essential Indicators

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

Sr. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Confederation of Indian Industry (CII)	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.

No such matter related to anti-competitive conduct by the entity is reported

### PRINCIPLE 8 Businesses should promote inclusive growth and equitable development

The company through its employee volunteerism and non-financial means supports the causes adopted by "Global Foundation"

*Additional information can be referred from Corporate Social Responsibility section under MDA part of the Annual Report.*

#### 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 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.

Our towers bring access to communications to communities living around our towers. As part of the service commitment, the Company endeavors to deliver high uptime on its towers. We always focus on fastest restoration of sites even during natural calamities and force majeure events. During service visits complaints received from nearby residents are reported to Circle management team for addressing the issue and redressal.

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

	FY 2022–23
Directly sourced from MSMEs/ small producers	3.56%

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

We are a Customer centric organization. As a shared telecom tower infrastructure (passive infra) provider, we have long term contracts with telecom operators, who are our customers. Our deliverables are defined under Service Level Agreements. With each of our Customers we have regular engagements within governance framework to ensure customers get desired services.

#### Essential Indicators

- Describe the mechanisms in place to receive and respond to consumer complaints and feedback.
  - Governance and Customer Key Account Management structure is in place underwhich reviews are held with the customers both at Corporate and Operating Circle levels, covering
    - Operations
    - Energy Management
    - Projects involving new sites / upgradation of existing sites / receivables.
  - Telecom being an essential enabler, during all natural calamities and force majeure situations, Business Continuity plans are drawn along with the customers for minimum disruptions, disturbances at sites and timely restoration.

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

#### As a percentage to total turnover

Environmental and social parameters relevant to the product	NA
Safe and responsible usage	NA
Recycling and/or safe disposal	NA

- No. of consumer complaints in respect of the following:

	FY 2022–23 (Current Financial Year)		Remarks	FY 2021–22 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	Nil	Nil	–	Nil	Nil	–
Advertising	Nil	Nil	–	Nil	Nil	–
Cyber–security	Nil	Nil	–	Nil	Nil	–
Delivery of essential services	Nil	Nil	–	Nil	Nil	–
Restrictive Trade Practices	Nil	Nil	–	Nil	Nil	–
Unfair Trade Practices	Nil	Nil	–	Nil	Nil	–
Other	Nil	Nil	–	Nil	Nil	–

- Details of instances of product recalls on account of safety issues:

	Number	Reasons for recall
Voluntary recalls	Not Applicable	Not Applicable
Forced recalls	Not Applicable	Not Applicable

- Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No)  
Yes, the company has a well–defined Data Privacy and Cyber Security Policy that is accessible to the employees on the Intranet.
- Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re–occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

Not Applicable