

GTPL Hathway Limited

Environmental Social and Governance (ESG) Policy

Applies to	GTPL Hathway Limited
Issue / Release Date	October 14, 2023
Issuing Authority	Board of Directors of the Company

Introduction:

Environmental, Social, and Governance considerations are essential in an age of eminent climate change risks and threats. GTPL Hathway Limited (“GTPL” or “Company”), as India’s largest service provider in digital cable TV services is committed to the creation of a sustainable and greener future through its actions.

Purpose Statement:

The purpose of the policy is to guide all the stakeholders of GTPL such that the highest standards of environmental and social considerations, and ethical practices are integrated in decision-making and policy implementation.

Scope of the Policy:

This policy applies to all employees of GTPL, across all operations and locations of the Company. Vendors, contractors, sub-contractors, value chain partners, and any third party associated with the Company at any point in time must adhere to this policy.

Alignment:

This policy document aligns with international standards like the UNGC Principles on Human Rights and National standards like the BRSR Directive by SEBI and the Company’s Code of Conduct, EHS, and the CSR Policy.

Policy Commitment:

1. Environmental Protection:

GTPL understands the impact of Climate change and is committed to aligning with nationally determined commitments including the Paris Agreement by minimizing its carbon footprint. All aspects of environmental sustainability are material to the Company, emphasizing Waste Management and Circular Economy, Energy Management, GHG Emissions, and Climate Change Action, in line with industry and sectorial standards.

- Waste Management and Circular Economy

The Company is committed to following all waste management regulations and mandates as per regional and national standards across all locations and levels of operation.

- The Company will make its best efforts to reduce waste generation at and through the entire value chain.
- Segregate E-waste and dispose of it sustainably as per compliance requirements.

- Accommodate more sustainable packaging for all set-top boxes, remotes, cables, and any other equipment and accessory
- Ensure compliance with all waste-management laws, as applicable.
- Incorporate the principles of circular economy in everyday operations.
- Energy and GHG Emission Management:

GTPL is cognizant of the impact GHG emissions and non-renewable energy can have on the environment, for the same, the Company commits to be mindful of its operations and be more efficient and environmentally sustainable.

- Ensure efficient energy use in all its operations and incorporate more renewable energy resources across all the locations.
- Make processes more efficient and less energy intensive.
- Measure GHG emissions, account for all carbon footprint, and adopt actions to minimize it.

Climate Change Action

The Company understands the threat that climate risks, both physical and transition, pose to humanity, and financial as well as non-financial systems. It commits to act towards climate change and mitigation as is possible within the scope of the organization. It also commits to:

- Identify specific climate change risks that can be a threat to the Company and its operations and implement appropriate mitigation strategies.
- Create a resilient value chain across all areas of business.
- Formulate an ESG as well as a Climate Mitigation strategy to make the business resilient at all levels.

2. **Social Wellbeing:**

GTPL's operations and business activities impact multiple stakeholders, directly as well as indirectly. The Company commits to being accountable for all its stakeholders, creating good impact and better change at all levels with a focus on:

- Employee Training and Development

All employees and staff members are key to all operations undertaken in the Company. The staff's capability, knowledge, and skills directly contribute to the Company's efficiency and quality. It commits to:

- Constantly update and arrange for training for all staff members and employees on any new technologies, techniques, equipment usage, etc., relevant to their duties
- Train all employees on issues of environment, health and safety, and emergency medical procedure
- Have regular employee engagement sessions in accordance with Human Resources for better coordination and a working system for all employees
- Engage with employees through online as well as offline feedback sessions

- Customer Relationship Management

Customers and their required services as well as their experience with GTPL are fundamental to the Company's performance. Managing customer relationships is, hence, key to the Company and it commits to:

- Monitor client needs, queries, and complaints through different platforms like surveys, questionnaires, toll-free number, etc. regularly and establish procedures to resolve the same.
- Design creative and innovative ways to better address customer requirements
- Attend to queries and focus on long-term relationship building with the customer
- Automate the feedback mechanism by deploying a management information system for CRM
- Keep bettering the CRM system as per industry trends and technological advances

- Responsible Supply Chain

A responsible supply chain is the backbone of operational efficiency throughout the organization and essential to sustainability integration in the organization. The Company commits to:

- Introducing efficiency and environmentally sustainable operations as well as alternatives through the supply chain
- Focus on social well-being with respect to healthy working conditions, in line with all national regulations on working hours and labour laws
- Incorporate ESG-related parameters, as per GTPL ESG policies and procedures, in Supplier Selection criteria.
- Conduct training and awareness sessions of vendors and suppliers on ESG-related requirements regularly.
- Develop a methodology for ESG Due Diligence and conduct third-party audits of suppliers.

- Employee Wellbeing

Employees are key to any Company's performance and success and hence focussing as well investing in employee wellbeing should be a fundamental agenda for a Company. GTPL Commits to:

- Uphold all values of inclusion, diversity, and equity in the workplace
- Take into consideration all complaints or grievances of the employee fairly and impartially
- Keep an open and anonymous feedback channel and streamlined addressal of the same with consideration to time
- Develop a procedure to identify the requirements of the different employee engagement and skill development programs, plan and conduct training and development programs for enhancing employees' skills and career growth
- Engage with employees regularly through various channels
- Provide employees with programs, and policies that extend healthy well-being beyond occupation-related ill health
- Work towards better employee satisfaction with a focus on the gaps identified through surveys

- Also, comply with applicable laws, regulations, and industry standards related to employee remuneration, including minimum wage requirements, overtime compensation, and other statutory benefits
- Community Development

Communities that are impacted by any direct or indirect activities of the business form a core stakeholder for the organization. Their development and progress can also be a measure of impact creation for the organization, alongside its CSR Initiatives. GTPL ensures:

- Creation of a positive impact on the surrounding community for all its projects
- Protection of people and the planet through all projects carried out regarding the community
- To raise the standard of living and quality of life of the people in the communities
- Reduce the adverse impacts of business activities (if any) on the neighbourhood and the environment by working with the community and other stakeholders.
- Human Rights

GTPL is committed to respecting human rights in line with national, and international frameworks and the Company's core values. The ethos of the Company is fundamental in its commitment to Human Rights and GTPL shall:

- Not employ children at all workplaces
- Have no form of forced labour
- Comply with all applicable laws and respect internationally recognized human rights and labour law regulations.
- Establish procedures for human rights assessment
- Take bold action against any hostile, intimidating, or offensive behaviour, including but not limited to discrimination, harassment, and retribution
- Health and Safety

Employees are the key resource of a Company, their health and safety, as well physical, mental, and emotional well-being are very important. In light of protecting the well-being of the employee, through multiple risks to the operations of the industry, the Company commits to:

- Conduct awareness programs and trainings on Occupational Health and Safety
- Engage in simulations or surprise emergency trials related to EHS
- Create a first-aid program and training mandatory for all employees
- Provide a safe, healthy, clean, and ergonomic working environment
- Conduct activities for employee engagement regularly
- Formulate and implement policies around E/OHS after identifying relevant risks for the operations of the Company and at different levels of working
- Ensure Zero harm across our operations

3. **Governance:**

The Company recognizes the importance of corporate governance to achieve its goal of being sustainable and has set guidelines for the right practices, risk management, and ethical conduct with key emphasis on the following:

- Governance and Accountability

Accountability is key for improvement, which forms a core part of governance as well. By being responsible and accountable, the Company commits to:

- Establish an ESG governance framework with oversight under the Board of Directors and Leadership.
- Have a robust data management system for tracking goals and performance on ESG parameters.

- Regulatory Compliance

GTPL ensures strict alignment and compliance with all national legislation, guidelines as well as regulations. It commits to strict Board Oversight over all levels of legal matters and regulation, in this regard GTPL shall:

- Set up a team to update and help different departments comply with the legal requirements and timely submission under different statutes.
- Take legal advice only from an external legal advisor or lawyer whenever required
- Take into account all documents and proofs of compliance as per the legal requirements.
- Set up a compliance management system and update the status of compliance on a regular basis.

- Risk Management

Risk management forms a core area for the organization, especially systematic risks in case of any collapse or compromise of technological and/or informational systems. GTPL commits to:

- Ensuring that risks and opportunities related to the Company's operations are regularly discussed with the board members.
- Integrate the ESG risk and Opportunities in the ERM framework.
- A mitigation plan for the risks is devised while keeping the operations in consideration
- The risks and opportunities are updated, and the mitigation plan is reviewed and revised with respect to the best practices and solutions available in the market.

- Information Protection

GTPL is dedicated to upholding the highest standards in customer privacy protection and follows industry best practices. Committing to the same, GTPL will:

- Ensures to establish clear data handling guidelines, implement robust security measures, and prevent unauthorized access or disclosure.
- Define data retention periods, ensure secure data disposal, identify, and manage cybersecurity threats, and use encryption, firewalls, intrusion detection systems, and access controls.
- Complying with data privacy laws, supporting employees and stakeholders, and regularly updating policies to address new risks and legal requirements are also part of the Company's commitment.

- **Anti- Bribery and Anti-Corruption**

Through its anti-bribery and anti-corruption policy, GTPL wants to demonstrate its steadfast commitment to preventing bribery and corruption while promoting a culture of transparency, accountability, and compliance. To this end, GTPL shall:

- Comply with all applicable laws and regulations related to anti-bribery and anti-corruption.
- Provide training and spread awareness among the employees on a regular interval
- Commit to prevent, deter, and detect bribery and other corrupt behaviour and be governed by the Code of Conduct on severe consequences of violations

- **Competitive Behaviour**

The concept of fair trade and competition is core to GTPL. To this end, GTPL shall:

- Ensure that the consumer receives the goods or services on the most favourable terms possible
- Act independently of any competitor while being creative, innovative and efficient in its service delivery

Monitoring and Reporting

The members of the Company's committee will be responsible for reviewing the performance in relation to the ESG activities and targets. The board will receive updates on the same every six months.

Changes to this policy

The policy may be updated in accordance with the Company's ESG strategy as and when required, and any necessary updates will be properly announced on our website or through other suitable channels.

Contact

Any questions or queries related to this policy should be addressed to Committee.