

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	Date of Incorporation	04–02–2004	
4	Registered office address	7 th Floor, Building A, Plot EL 207, MIDC, TTC Industrial Road, Navi Mumbai – 400 710, Maharashtra.	
5	Corporate address	7 th Floor, Building A, Plot EL 207, MIDC, TTC Industrial Road, Navi Mumbai – 400 710, Maharashtra.	
6	E–mail	gilshares@gtlinfra.com	
7	Telephone	+91 22 68293500	
8	Website	http://www.gtlinfra.com	
9	Financial year for which reporting is being done	Start date	End date
	Current Financial Year	01–04–2024	31–03–2025
	Previous Financial Year	01–04–2023	31–03–2024
	Prior to Previous Financial year	01–04–2022	31–03–2023
10	Name of the Stock Exchange(s) where shares are listed	1. BSE Limited 2. National Stock Exchange of India Limited	
11	Paid–up Capital (In Rs)	128,091,118,950	
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report		
	Name	Whole–time Director – Mr. Vikas Arora	
	Contact	+91 22 68293500	
	E mailleg	gilshares@gtlinfra.com	
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.	
14	Whether the company has undertaken reasonable assurance of the BRSR Core?	Not applicable for FY 2024–25	
15	Name of assurance provider	Not applicable	
16	Type of assurance obtained	Not applicable	

II. Products/services

17 Details of business activities (accounting for 90% of the turnover)

Sr.	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%

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

Sr.	Product / Service	NIC Code	% of total Turnover contributed
1	Providing Telecom Towers on shared basis to multiple telecom operators	619	100%

III. Operations

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

Location	Number of plants	No of offices	Total
National	0	21	21
International	0	0	0

- 20 Markets served by the entity

- A Number of locations

Locations	Number
National (No. of States)	33 (28 States & 5 UTs)
International (No. of Countries)	Nil

- B What is the contribution of exports as a percentage of the total turnover of the entity?

0%

- 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, etc.

IV. Employees

- 21 Details as at the end of Financial Year

- A Employees and workers (including differently abled)

Sr. No.	Particulars	Total (A)	Male		Female		Other	
			No. (B)	% (B / A)	No. (C)	% (C/ A)	No. H	% (H/ A)

EMPLOYEES

1	Permanent (D)	308	275	89.29%	33	10.71%	0	0%
2	Other than permanent (E)	286	260	90.91%	26	9.09%	0	0%
3	Total employees (D + E)	594	535	90.07%	59	9.93%	0	0%

WORKERS

4	Permanent (F)	8	8	100%	0	0.00%	0	0%
5	Other than permanent (E)	989	984	99.49%	5	0.51%	0	0%
6	Total workers (F + G)	997	992	99.50%	5	0.50%	0	0%

- B. Differently abled Employees and workers:

Sr. No.	Particulars	Total (A)	Male		Female		Other	
			No. (B)	% (B / A)	No. (C)	% (C/ A)	No. H	% (H/ A)

DIFFERENTLY ABLED EMPLOYEES

1	Permanent (D)	1	1	100%	0	0%	0	0%
2	Other than permanent (E)	0	0	0%	0	0%	0	0%
3	Total differently abled employees (D + E)	1	1	100%	0	0%	0	0%

DIFFERENTLY ABLED WORKERS

4	Permanent (F)	0	0	0%	0	0%	0	0%
5	Other than permanent (G)	0	0	0%	0	0%	0	0%
6	Total differently abled workers (F + G)	0	0	0%	0	0%	0	0%

22 Participation/Inclusion/Representation of women

Particulars	Total (A)	No. and percentage of females	
		No. B	% (B/A)
Board of Directors	7	2	28.57%
Key Management Personnel	3	0	0%

23 Turnover rate for permanent employees and workers

Particulars	Turnover rate in current FY (2024–25)				Turnover rate in previous FY (2023–24)				Turnover rate in the year prior to previous FY (2022–23)			
	M	F	O	Total	M	F	O	Total	M	F	O	Total
Permanent Employees	7.17%	0.00%	0.00%	7.17%	9.90%	1.50%	0.00%	9.49%	9.30%	0.70%	0.00%	9.72%
Permanent Workers	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	16.50%	0.70%	0.00%	17.13%

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

24 (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

25 (i) Whether CSR is applicable as per section 135 of Companies Act, 2013:

No

(ii) Turnover (in ₹) 13,44,07,01,343

(iii) Net worth (in ₹) (59,61,29,24,598)

VII. Transparency and Disclosures Compliances

26 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/NA)	(If Yes, then provide web-link for grievance redress policy)	FY (2024–25)			PY (2023–24)			(If NA then provide the reason)
			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	https://www.gtlinfra.com/contact-us/	0	0	–	0	0	–	–
Investors (other than shareholders)	Yes	https://www.gtlinfra.com/investors/investor-services/	0	0	–	0	0	–	–
Shareholders	Yes	https://www.gtlinfra.com/investors/investor-services/	0	0	–	0	0	–	–
Employees and workers	Yes	https://www.gtlinfra.com/contact-us/	0	0	–	0	0	–	–
Customers	Yes	–	0	0	–	0	0	–	Refer note I
Value Chain Partners	Yes	–	0	0	–	0	0	–	Refer note II
Other (Landlords)	Yes	–	0	0	–	0	0	–	Refer note III

Note I: We regularly connect with our customers through Operations 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

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 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 total number of legal notices received by the Company from various landlords for the FY 2024 – 2025 are 1235. The Company has responded to majority of such legal notices and as on March 31, 2025; 626 number of matters have been filed by various landlords before various judicial authorities and Company is defending the same.

27 Overview of the entity material responsible business conduct issues:

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	Opportunity: To reduce dependency on Fossil Fuels and tap cleaner & lower cost of Energy resources Risk: Dependency on continuous availability of Energy Sources through Electricity and Diesel Generation causes GHG Emission	We are continuously working towards sequential reduction in energy consumption from diesel and shift to electricity wherever possible (for the same site load) This will lead to reduced emission due to lower Diesel burn. There is also continued emphasis on driving efficiency in utilization for the same load through capacity optimization of Diesel generators, deployment of Battery banks and tapping higher availability of grid supplied electricity.	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 our Cost of Operations as per unit cost of electricity from grid is lower than DG and benefits our customers.
2.	Human Capital	Opportunity and Risk	Opportunity: 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. Risk: High Attrition, Poor Service Delivery, Risk of Image and Reputation, etc	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. We capture voice of employees through suggestion box and address their issues, suggestions, complaints in a time bound manner	Positive - Efficient operations; ownership of our people toward company's objectives drives customer success Negative - Compliance issues with labour laws and regulations may lead to disruption and penalties - Ability to attract talent would be hampered leading to increased cost of hiring.
3.	Health and Safety	Opportunity and Risk	Opportunity: - Reduced Absenteeism - Optimum Productivity - Prevent accidents Risks: - Health issues faced by employees on and off duty can cause disruptions and affect our quality of services to customer - It will lead to lower confidence from customers on our services affecting the business prospects.	- Health insurance and term insurance coverage is ensured for all manpower. - Health awareness from doctor consultation. - Personal Accident Policy cover for Employees.	Positive - Efficient operations, consistency in service and quality Negative - Reduced man days due to illness / accidents leading to higher cost of delivery - Retention issues that increases wage cost - Service disruptions
4.	Waste Management	Opportunity and Risk	Opportunity: - Reduction in waste generation and disposal through authorised scrap dealers Risk: - Adverse actions for non-compliance in case of waste disposal - Inefficient replacement/ withdrawal of productive items contributes to uneconomical cost	- Disposal of E-Waste / Hazardous Waste/ General Waste etc. is being done through authorized/ approved recyclers. - Wherever possible, useful life of assets is increased through refurbishing and repairs to minimize waste and redeployment	Positive - Savings in the form of enhanced useful life of equipment and reduced waste generation. Negative - Higher replacement cost of equipment. - Mishandling of hazardous waste leading to penalties / harmful effects

Section B: Management and Process Disclosures

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
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 http://www.gtlinfra.com/investors								
2. Whether the entity has translated the policy into procedures.	Yes, The Company endeavours to implement and translate all the policies into procedures and practices.								
3. Do the enlisted policies extend to your value chain partners?	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, Trustee) 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.	To integrate ESG priorities in its operations, in FY 2024–2025, 37 no. of additional sites were electrified resulting in incremental reduction of Diesel consumption by 2.20 lakh litres vis-a-vis its previous financial year. During FY 2025–26, the Company aims to further electrify 15 no. of sites.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Please refer comment on point 5 above.								

Governance, leadership and oversight

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)	At GTL Infrastructure, we remain committed to enabling connectivity in some of India's most remote regions, while advancing our ESG goals through innovation and responsible operations. In FY 2024–25, we achieved 99.81% network uptime, driven by strategic resource deployment and engineering upgrades. We extended the life span of equipment, reducing waste, and augmented existing DG capacities to avoid additional diesel consumption. Our shift to Li-Ion battery technology and continued electrification of sites reflect our focus on energy efficiency and environmental stewardship. We operate with integrity, guided by a strong Code of Conduct and robust audit mechanisms that ensure transparency and compliance. Our infrastructure not only connects people — it supports inclusive growth and sustainable development. As we move forward, we remain focused on enhancing uptime, reducing our carbon footprint, and delivering long-term value to all stakeholders.								
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, the company has a CSR committee of the Board of Directors. Also there is Senior Leadership Team that works towards sustainability.								
10. Details of Review of NGRBCs by the Company									

Subject for Review	Indicate whether review was undertaken by Director/ Committee of the Board/Any other Committee									Frequency (Annually / Half yearly / Quarterly/ Any other—please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	✓	✓	✓	✓	✓	✓	✓	✓	✓	Annually								
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
	✓	✓	✓	✓	✓	✓	✓	✓	✓	The compliance is monitored quarterly								
11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency?	P1	P2	P3	P4	P5	P6	P7	P8	P9	The working of all 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	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	5	– Corporate Governance updates – Risk Management updates	100%
Key Managerial Personnel	10	– Awareness session on the Statutory Compliance, Business Plans, etc. – POSH – Anti-Harassment	80%
Employees other than BoD and KMPs	6	– Practical Financial Planning Workshop – Awareness on Compliance – Financial Independence in Real Sense – PCOS Awareness Session	70%
Workers	–	–	–

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

8. Number of days of accounts payables

Particulars	FY (2024-25)	PY (2023-24)
i) Accounts payable x 365 days	89,693,478,823	117,048,526,164
ii) Cost of goods/services procured	9,608,367,205	9,516,841,685
iii) Number of days of accounts payables	9	12

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 (2024–25)	PY (2023–24)
Concentration of Purchases	a. i) Purchases from trading houses	Not Applicable	Not Applicable
	ii) Total purchases		
	iii) Purchases from trading houses as % of total purchases		
	b. Number of trading houses where purchases are made		
	c. i) Purchases from top 10 trading houses		
	ii) Total purchases from trading houses		
	iii) Purchases from top 10 trading houses as % of total purchases from trading houses		
Concentration of Sales	a. i) Sales to dealer / distributors	Not Applicable	Not Applicable
	ii) Total Sales		
	iii) Sales to dealer / distributors as % of total sales		
	b. Number of dealers / distributors to whom sales are made		
	c. i) Sales to top 10 dealers / distributors		
	ii) Total Sales to dealer / distributors		
	iii) Sales to top 10 dealers / distributors as % of total sales to dealer / distributors		
Share of RPTs in	a. i) Purchases (Purchases with related parties)	Not Applicable	Not Applicable
	ii) Total Purchases		
	iii) Purchases (Purchases with related parties as % of Total Purchases)		
	b. i) Sales (Sales to related parties)		
	ii) Total Sales		
	iii) Sales (Sales to related parties as % of Total Sales)		
	c. i) Loans & advances given to related parties		
	ii) Total loans & advances		
	iii) Loans & advances given to related parties as % of Total loans & advances		
	d. i) Investments in related parties		
	ii) Total Investments made		
	iii) Investments in related parties as % of Total Investments made		

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

Essential Indicators

- 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.

	FY (2024–25)	FY (2023–24)	Details of improvements in environmental and social impacts
R&D	–	–	During the year the company has made capex investments on energy conservation initiatives through the deployment of battery banks and electrification of sites. 37 sites were Electrified in the financial year 2024–2025 thereby reducing the diesel consumption.
Capex	69%	67%	

2. a. Does the entity have procedures in place for sustainable sourcing?
- Yes, the company integrates sustainability into its procurement strategy by prioritizing environmentally responsible sourcing in all purchasing decisions. Capital investments in Class A products—such as diesel generators, battery banks, and SMPS units—are rigorously evaluated based on their lifecycle performance, energy efficiency, emissions profile, and end-of-life waste management practices.
- **Vendor Selection Based on ESG Compliance**
Procurement of critical infrastructure components like batteries, SMPS, and generators is conducted through vendors who demonstrate strong Environmental, Social, and Governance (ESG) commitments. These commitments are verified through publicly available ESG disclosures, including Business Responsibility Reports and other sustainability-related documentation. Vendor assessment and prioritization are therefore closely aligned with ESG performance indicators.
 - **Energy Efficiency Monitoring**
The company conducts regular evaluations of product efficiency, with a particular focus on energy consumption metrics. This ongoing monitoring ensures optimal performance and supports the organization's broader sustainability goals.
 - **Support for Local Enterprises**
In line with its commitment to inclusive growth, the company actively engages local service providers, including medium and small-scale enterprises and regional entrepreneurs. This approach not only fosters community development but also strengthens the local supply chain ecosystem.
- b. If yes, what percentage of inputs were sourced sustainably?
- Nearly 95% of CAPEX procured is continuously assessed on periodical basis
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:
- As part of our business operations, we utilize batteries and various electronic products. Batteries are classified as hazardous waste due to their chemical composition, while components such as SMPS units are categorized as non-hazardous waste. Needful actions are performed for handling E-waste disposal, efforts are taken to increase the life span of SMPS, etc. to reduce waste. Vendors are also required to do safe disposal of used batteries.
- **Material Movement and Tracking**
Deployment of materials from the warehouse to operational sites is governed by the Material Request Note (MRN) process. Upon completion of the product's shelf life, retrieval from sites is initiated through a Site Return Note (SRN), raised by the end user. Once returned to the warehouse, materials undergo a structured Health Assessment conducted by our in-house Testing & Repair Centre (TRC).
 - **Repair and Redeployment Workflow**
Following TRC's assessment, each item is validated by a Subject Matter Expert (SME) to determine its condition. Items deemed repairable are sent to the SME Workshop for refurbishment and subsequently redeployed. Materials identified as scrap are further reviewed by the respective Circle Team for final classification.
 - **Responsible Disposal and Compliance**
Disposal of assets—especially those falling under Pollution Control Board norms, including e-waste, hazardous waste, and general waste—is carried out in strict compliance with regulatory guidelines. Disposal activities are publicly advertised, and only authorized and approved recyclers are permitted to participate in inspections and scrap collection from designated warehouse locations.
4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities?
- No

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

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	275	275	100%	275	100%	0	0%	275	100%	0	0%
Female	33	33	100%	33	100%	33	100%	0	0%	0	0%
Other	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	308	308	100%	308	100%	33	10.7%	275	89.2%	0	0%

Category	% of employees covered by										
	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)
Other than permanent employees											
Male	260	260	100%	260	100%	0	0%	260	100%	0	0%
Female	26	26	100%	26	100%	26	100%	0	0%	0	0%
Other	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	286	286	100%	286	100%	26	9.0%	260	90.9%	0	0%

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

Category	% of workers covered by										
	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)
Permanent workers											
Male	8	8	100%	8	100%	0	0%	8	100%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
Other	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	8	8	100%	8	100%	0	0%	8	100%	0	0%
Other than permanent workers											
Male	984	984	100%	984	100%	0	0%	984	100%	0	0%
Female	5	5	100%	5	100%	5	100%	0	0%	0	0%
Other	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	989	989	100%	989	100%	5	0.5%	984	99.4%	0	0%

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

Particulars	FY (2024–25)	PY (2023–24)
i) Cost incurred on wellbeing measures (well-being measures means well-being of employees and workers (including male, female, permanent and other than permanent employees and workers))	36,292,034	30,151,835
ii) Total revenue of the company	13,440,701,343	13,720,126,661
iii) Cost incurred on wellbeing measures as a % of total revenue of the company	0.27%	0.22%

2. Details of retirement benefits

Benefits	FY (2024–25)			PY (2023–24)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	91.75%	99.89%	Yes	100%	100%	Yes
ESI	1.51%	81.14%	Yes	2%	86%	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?

Yes

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016?

Yes

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	0	0	0	0
Female	0	0	0	0
Other	0	0	0	0
Total	0	0	0	0

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker?

If yes, give details of the mechanism in brief.	Yes / No	(If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes	We have a dedicated mail id suggestions@gtlinfra.com for all employee / workers grievance. Also we have a dedicated suggestion box on reception desk.
Other than Permanent Workers	Yes	
Permanent Employees	Yes	
Other than Permanent Employees	Yes	

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

Category	FY 2024–25			PY 2023–24		
	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)
Total Permanent Employees	308	0	0%	273	0	0%
Male	275	0	0%	246	0	0%
Female	33	0	0%	27	0	0%
Other	0	0	0%	0	0	0%
Total Permanent Workers	8	0	0%	4	0	0%
Male	8	0	0%	4	0	0%
Female	0	0	0%	0	0	0%
Other	0	0	0%	0	0	0%

8. Details of training given to employees and workers:

Category	FY (2024–25)						PY (2023–24)			
	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	535	394	73.64%	0	0.00%	538	128	23.79%	31	5.76%
Female	59	51	86.44%	1	1.69%	52	34	65.38%	21	40.38%
Other	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Total	594	445	74.92%	1	0.17%	590	162	27.46%	52	8.81%
Workers										
Male	992	27	2.72%	26	2.62%	911	11	1.21%	0	0.00%
Female	5	0	0.00%	0	0.00%	4	1	25.00%	0	0.00%
Other	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Total	997	27	2.71%	26	2.61%	915	12	1.31%	0	0.00%

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

Category	FY (2024–25)			PY (2023–24)		
	Total (A)	No. (B)	% (B / A)	Total (D)	No. (E)	% (E / D)
Employees						
Male	535	535	100%	538	538	100%
Female	59	59	100%	52	52	100%
Other	0	0	0%	0	0	0%
Total	594	594	100%	590	590	100%

Category	FY (2024–25)			PY (2023–24)		
	Total (A)	No. (B)	% (B / A)	Total (D)	No. (E)	% (E / D)
Workers						
Male	992	992	100%	911	911	100%
Female	5	5	100%	4	4	100%
Other	0	0	0%	0	0	0%
Total	997	997	100%	915	915	100%

10. Health and safety management system:

- a. Whether an occupational health and safety management system has been implemented by the entity?

Yes, the company has established a structured Occupational Health and Safety Management System designed to cultivate a safe, resilient, and health-conscious work environment. This framework emphasizes proactive risk mitigation, employee well-being, and regulatory compliance.

 - **Awareness & Preparedness Initiatives**

To strengthen workplace safety culture, the company conducts regular safety awareness programs, mock drills, and emergency response training across operational sites. These initiatives ensure that employees are well-prepared to handle potential hazards and emergencies with confidence and competence.
 - **Access to Medical Support**

Employees benefit from periodic health consultations facilitated through scheduled visits by qualified medical professionals. These sessions support early detection of health issues and promote overall wellness.
 - **Insurance & Protection Coverage**

All employees are covered under Group Personal Accident Insurance and Mediclaim Insurance Schemes, providing comprehensive financial protection against medical emergencies and unforeseen incidents. This coverage reflects the company's commitment to safeguarding its workforce both on and off the job.
- b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

The company employs a systematic and proactive approach to identify, assess, and mitigate work-related hazards across both routine and non-routine operations. This framework is designed to ensure a safe working environment and minimize risk exposure for all personnel.

 - **Office Premises Safety Oversight**

Within office facilities, the Administration Department conducts regular safety inspections focusing on critical infrastructure elements such as fire safety systems, electrical installations, and water supply networks. These inspections help maintain operational safety and prevent potential disruptions.
 - **Tower Site Risk Management**

At tower sites, a two-tier monitoring system—led by Technicians and Cluster Managers—facilitates ongoing preventive maintenance and on-site hazard identification. This hands-on approach ensures that any unsafe condition or reported risk is swiftly addressed to preserve site integrity and protect field personnel.
- c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks?

The Company has implemented a simple reporting system that empowers employees to raise concerns about work-related hazards and unsafe conditions without hesitation. This system ensures that all safety issues are addressed promptly and effectively.

 - **Office Locations**

Employees can report hazards through designated feedback channels, including email, internal portals, or direct communication with the Administration or Management teams. The Circle Administration and Human Resources (HR) departments collaborate to assess reported concerns and implement risk mitigation measures. Periodic awareness sessions and signage reinforce the importance of proactive hazard reporting.
 - **Tower Sites**

The Operations and Maintenance (O&M) team acts as the primary contact for field technicians and site personnel to report safety issues. A tiered escalation framework ensures that unresolved or critical concerns are elevated to HR/Admin personnel.
- d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services?

Yes, the Company is committed to supporting the overall well-being of its employees by providing access to **comprehensive non-occupational medical services**. Through strategic partnerships with reputed healthcare institutions, employees can avail a range of medical consultations and treatments that extend beyond workplace-related health concerns. In addition, all employees are covered under a **Group Mediclaim Insurance Policy**, offering financial protection and

continuous support for personal health needs. This coverage ensures that employees and their families receive timely medical attention and assistance, reinforcing the Company's dedication to holistic employee care.

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

Safety Incident/Number	Category*	FY (2024–25)	PY (2023–24)
Lost Time Injury Frequency Rate (LTIFR) (per one million–person hours worked)	Employees	0	0
	Workers		
Total recordable work–related injuries	Employees	0	0
	Workers		
No. of fatalities	Employees	0	0
	Workers		
High consequence work related injury or ill–health (excluding fatalities)	Employees	0	0
	Workers		

* Including in the contract workforce

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

The Company prioritizes the safety, health, and well–being of its employees by implementing a comprehensive set of measures across all office locations. These initiatives are designed to create a secure, hygienic, and comfortable working environment. Key initiatives include:

– **Fire Safety Infrastructure**

Fire Hydrants are strategically installed and regularly inspected to ensure readiness in case of emergencies. Clearly marked Fire Exits are maintained across all floors, with unobstructed access and illuminated signage for quick evacuation. Periodic fire drills and training sessions are conducted to enhance employee preparedness.

– **Sanitation and Cleanliness**

A dedicated Housekeeping Team ensures daily cleaning and disinfection of workspaces, common areas, restrooms, and high–touch surfaces. Use of hospital–grade disinfectants and adherence to cleaning protocols help prevent the spread of infections. Waste disposal is managed efficiently with segregation and timely removal. Regular pest controls and fumigation activity is conducted in office premises.

– **On–Site Health Facilities**

A fully equipped Health and Medical Centre is established within large office premises at Mahape, offering first–aid support and basic medical care. Employees have access to consultations with doctors from reputed hospitals, ensuring timely medical advice and support for non–occupational health concerns.

– **Security guards**

There are security guards present at all GIL offices. Security staff ensure that company assets are protected from theft, damage or misuse. They enforce company policies related to movement of equipment / sensitive materials and monitor entry and exit points to prevent unauthorized access.

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

Particulars	FY (2024–25)			PY (2023–24)		
	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	0	0	–	0		0
Health & Safety	0	0	–	0		0

14. **Assessments for the year:**

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

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

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

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

Essential Indicators

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

The Company follows a structured and strategic approach to identify and classify its key stakeholder groups. This process is essential for fostering meaningful engagement, aligning business objectives with stakeholder expectations, and ensuring long-term sustainability. The identification process is guided by the following principles:

– Mapping Interdependence and Influence

Stakeholders are first assessed based on their interdependence with the Company's services—whether they rely on our offerings for their own operations or well-being.

Simultaneously, the Company evaluates its own dependence on these stakeholders for critical aspects of its operations, such as supply chain continuity, regulatory compliance, market access, and community support.

– Classification Based on Relationship Type

Stakeholders are then classified into priority groups based on the nature of their relationship with the Company:

Contractual Stakeholders: Entities bound by formal agreements, including customers, suppliers, service providers, and employees.

Operational Stakeholders: Groups that directly influence or are influenced by day-to-day business activities, such as regulators, local authorities, and logistics partners.

Moral and Social Stakeholders: Communities, NGOs, and advocacy groups with whom the Company shares a social responsibility or ethical obligation, even in the absence of formal contracts.

– Strategic Prioritization

Each stakeholder group is evaluated for its level of influence, interest, and impact on the Company's strategic goals. This prioritization helps determine the depth and frequency of engagement, ensuring that resources are allocated effectively and that stakeholder concerns are addressed proactively.

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

Sr. No.	Stakeholder Group	Whether identified as Vulnerable & Marginalized Group	Channels of communication	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
1	Employees	No	- Engagement Activities - Communication through emails and letters - Leadership interactions - Suggestion Box	Ongoing	- Goal Setting - Performance review - Career development - Employee benefits - Equal opportunities - Recognition - Learning and development - Safety and well-being - Policy awareness - Voice of employee
2	Customers	No	- Emails and Phone calls - Governance Meetings - Video Conferences - Groups based on instant messaging services	Ongoing	- Network Uptime performance - Reviews & Reconciliations - Customer queries feedback - Query Resolution - Mapping of new sites - Voice of customer
3	Shareholders	No	- Annual General Meeting - Press Release - Website updates - Stock Exchange releases - Email support for investor queries	Annual / Ongoing	- Timely business updates - Update on material events - Resolution on investor queries
4	Regulatory Bodies	No	- Emails/ Letters - In Person meetings	Need based	Need based interactions for policy matters
5	Suppliers	No	- Emails/ Letters - Supplier visits and Company's visits to supplier locations - Website updates - Advertisements	Ongoing	- Sourcing - Query resolution - Supplier performance review
6	Communities	Yes	Personal Interactions	Need based	- Grievance handling - Voluntary support through Global Foundation

PRINCIPLE 5 Businesses should respect and promote human rights

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 (2024–25)			PY (2023–24)		
	Total (A)	No. of employees/ workers covered (B)	% (B / A)	Total (C)	No. of employees/ workers covered (D)	% (D / C)
Employees						
Permanent	308	282	91.56%	273	246	90.11%
Other than permanent	286	262	91.61%	316	283	89.56%
Total Employees	594	544	91.58%	589	529	89.81%
Workers						
Permanent	8	8	100%	4	4	100%
Other than permanent	989	910	92.01%	911	820	90.01%
Total Workers	997	918	92.08%	915	824	90.05%

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

Category	FY (2024–25)					PY (2023–24)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C /A)		No. (E)	% (E /D)	No. (F)	% (F /D)
Employees										
Permanent	308	0	0.00%	308	100%	273	0	0%	273	100%
Male	275	0	0.00%	275	100%	246	0	0%	246	100%
Female	33	0	0.00%	33	100%	27	0	0%	27	100%
Other	0	0	0.00%	0	0.00%	0	0	0%	0	0%
Other than Permanent	286	4	1.40%	282	98.60%	316	6	1.90%	310	98.10%
Male	260	3	1.15%	257	98.85%	292	5	1.71%	287	98.29%
Female	26	1	3.85%	25	96.15%	24	1	4.17%	23	95.83%
Other	0	0	0.00%	0	0.00%	0	0	0%	0	0%
Workers										
Permanent	8	0	0.00%	8	100%	4	0	0%	4	100%
Male	8	0	0.00%	8	100%	4	0	0%	4	100%
Female	0	0	0.00%	0	0.00%	0	0	0%	0	0.00%
Other	0	0	0.00%	0	0.00%	0	0	0%	0	0.00%
Other than Permanent	989	168	16.99%	821	83.01%	911	297	32.60%	614	67.40%
Male	984	168	17.07%	816	82.93%	907	297	32.75%	610	67.25%
Female	5	0	0.00%	5	100%	4	0	0%	4	100%
Other	0	0	0.00%	0	0.00%	0	0	0%	0	0%

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

- a. Median remuneration / wages:

Particulars	Male		Female		Other	
	Number	Median remuneration / salary / wages of respective category	Number	Median remuneration / salary / wages of respective category	Number	Median remuneration / salary / wages of respective category
Board of Directors (BoD)	Please refer to Report on Corporate Governance Section of Directors' Report					
Key Managerial Personnel	2	8,03,291	–	–	–	–
Employees other than BoD and KMP	532	51,878.5	59	46,012	–	–
Workers	992	30,316	5	28,359	–	–

- b. Gross wages paid to females:

Particulars	FY (2024–25)	PY (2023–24)
Gross wages paid to females	25,49,523	21,75,872
Total wages	54,51,848	46,43,486
Gross wages paid to females (Gross wages paid to females as % of total wages)	46.76%	46.86%

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, we have committee responsible through Anti-Harassment, Grievance & also through POSH committee we ensure employees are secure and happy within the organisation.

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:

Particulars	FY (2024-25)			PY (2023-24)		
	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	–	0	0	–
Discrimination at workplace	0	0	–	0	0	–
Child Labour	0	0	–	0	0	–
Forced Labour/ Involuntary Labour	0	0	–	0	0	–
Wages	0	0	–	0	0	–
Other human rights related issues	0	0	–	0	0	–

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

Particulars	FY (2024-25)	PY (2023-24)
i) Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
ii) Average number of female employees/workers at the beginning of the year and as at end of the year	59	50
iii) Complaints on POSH as a % of female employees / workers	0	0
iv) Complaints on POSH upheld	0	0

8. 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.

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

Yes, our agreements/employment letters takes care of it

10. Assessments for the year:

Particulars	% 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 – please specify	100%
Child labour	100%

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 as all statutory compliances are maintained

PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment**1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**

Parameter	Units	FY 2024–25	PY 2023–24
From renewable sources			
Total electricity consumption (A)		–	–
Total fuel consumption (B)		–	–
Energy consumption through other sources (C)		–	–
Total energy consumed from renewable sources (A+B+C)		–	–
From non-renewable sources			
Total electricity consumption (D)	Gigajoules (GJ)	2446.31	12,21,763
Total fuel consumption (E)	Gigajoules (GJ)	–	4,23,176
Energy consumption through other sources (F)	Gigajoules (GJ)	–	–
Total energy consumed from non-renewable sources (D+E+F)	Gigajoules (GJ)	2446.31	16,44,939
Total energy consumed (A+B+C+D+E+F)	Gigajoules (GJ)	2446.31	16,44,939
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	Gigajoules (GJ) / ₹	0.0000001820	0.0001198924
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	Gigajoules (GJ) / ₹	0.0000037603	0.0024494019

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? – No

The Company has considered its direct power and fuel consumption for the above mentioned reporting for the Financial Year 2024–25. Power and Fuel used at mobile tower sites are reimbursed by telecom operators based on actual usage and are therefore not considered.

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?

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:

Parameter	FY (2024–25)	PY (2023–24)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	30690	15056
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	30690	15056
Total volume of water consumption (in kilolitres)	30690	15056
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	0.0000022834	0.0000010974
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.0000471743	0.0000224192

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? – No

4. Provide the following details related to water discharged:

The company does not measure the quantity of water discharged

5. Has the entity implemented a mechanism for Zero Liquid Discharge?

Given the nature of our operations, this question is not applicable to us.

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

Parameter	Please specify unit	FY (2024–25)	PY (2023–24)
NOx	Metric Ton	107.09	169.77
Sox	–	–	–
Particulate matter (PM)	Metric Ton	6.84	10.84
Persistent organic pollutants (POP)	–	–	–
Volatile organic compounds (VOC)	–	–	–
Hazardous air pollutants (HAP)	–	–	–
Others – (CO)	Metric Ton	79.74	126.43

Note: (*) NOx data also includes HC

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? – No

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

Parameter	Unit	FY (2024–25)	PY (2023–24)
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	18,504	29,615
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	2,44,447	2,06,257
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 / ₹	0.000019564	0.000017192
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)	Metric tonnes of CO ₂ equivalent / ₹	0.000404188	0.000351226

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? – No

8. Does the entity have any project related to reducing Green House Gas emission?

The Company remains committed to minimizing its carbon footprint by advancing ongoing sustainability efforts and exploring new opportunities to reduce greenhouse gas (GHG) emissions across its operations.

- **Transition to Green Sites:** Diesel–fuelled sites are being systematically converted into Green Sites, defined as locations with diesel consumption below 100 litres per quarter. This transition reflects a significant shift toward cleaner energy practices.

Progress: The number of Green Sites increased from 2,987 in FY 2023–24 to 3,555 in FY 2024–25.

(Note: In exceptional cases such as extended electricity board (EB) outages or force majeure events, minimal diesel usage may be permitted to ensure uninterrupted Telecom Network Operations.)

- **Adoption of Natural Cooling:** Select sites now utilize natural cooling techniques to reduce reliance on air–conditioning systems. This approach leverages favourable ambient temperatures to maintain optimal equipment performance, thereby lowering energy consumption and associated emissions.

- **Deployment of Advanced Battery Solutions:** To enhance energy efficiency, the Company is rolling out VRLA-based High-Temperature Cyclic (HTC) batteries. These advanced battery banks are designed to perform reliably under high-temperature conditions while reducing overall power demand.
- **Optimization through Genset Controller Units (GCUs):** GCUs play a pivotal role in curbing diesel generator usage, directly contributing to reduced carbon emissions:

New Installations: In FY 2024–25, GCUs were deployed at **1,969 sites**, marking a substantial increase from **1,367 sites** in FY 2023–24.

Refurbishments: An additional **418 GCUs** were repaired or upgraded in FY 2024–25, compared to **298 units** in the previous fiscal year.

These enhancements enable more precise control over generator operations, significantly reducing diesel consumption and associated emissions.

- **Enhancing Electricity Availability:** To further reduce dependency on diesel generators, the Company is actively improving grid connectivity through its feeder conversion project. This initiative aims to secure more stable and widespread access to electricity, enabling cleaner and more reliable power supply to telecom infrastructure.

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

Parameter	FY (2024–25)	FY (2023–24)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	–	–
E-waste (B)	2.8	–
Bio-medical waste (C)	–	–
Construction and demolition waste (D)	–	–
Battery waste (E)	1676	1346
Radioactive waste (F)	–	–
Other Hazardous waste. Please specify, if any. (G)	–	–
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	1509	1122
Total (A+B + C + D + E + F + G + H)	3187.80	2468.00
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.0000002372	0.0000001799
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.0000049003	0.0000036750
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	3187.80	2468.00
(ii) Re-used	–	–
(iii) Other recovery operations	–	–
Total	3187.80	2468.00
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	–	–

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? – No

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

The Company is committed to minimizing environmental impact by reducing the use of hazardous and toxic chemicals in its operations and adopting systematic, responsible waste management practices.

- **Responsible Handling of Hazardous and Non-Hazardous Waste:** Our operations involve the consumption of batteries—classified as hazardous waste—and electronic components such as SMPS (Switched Mode Power Supplies), which are categorized as non-hazardous waste. The Company follows a structured lifecycle approach to manage these materials efficiently and sustainably.
- **Material Lifecycle Management:** A robust framework governs the deployment, retrieval, assessment, and disposal of operational materials:

Deployment – Materials are dispatched from warehouses to operational sites through a controlled process using Material Request Notes (MRNs).

Retrieval – Upon completion of their shelf life, materials are returned to the warehouse via Site Return Notes (SRNs) for further evaluation.

Health Assessment – Returned items undergo rigorous testing at our In-house Testing & Repair Centre. Each item is validated by a Subject Matter Expert to determine its condition and classify it as either:

- **Repairable/Reusable:** Items meeting performance standards are refurbished and redeployed, extending their useful life and reducing waste generation.
- **Scrap:** Items deemed non-repairable are responsibly disposed of through authorized recyclers or returned to OEMs undertake back programs, ensuring compliance with environmental regulations.
- **Reduction of Hazardous Chemical Usage:** By prioritizing reuse and refurbishment, the Company significantly reduces the need for new material procurement, thereby limiting the introduction of hazardous substances into the supply chain. This approach not only curbs environmental risks but also promotes circular economy principles.

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:

Not Applicable

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

Not Applicable

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder

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.
1
- 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/International)
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**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 telecom towers serve as vital infrastructure, bringing reliable communication access to the communities in their vicinity. As part of our unwavering service commitment, the Company strives to maintain high uptime across all sites, ensuring seamless connectivity even in the face of natural disasters and force majeure events.

We prioritize rapid restoration of services to minimize disruptions and uphold network resilience. During routine service visits, any concerns or complaints raised by nearby residents are promptly documented and escalated to the Circle Management Team for timely resolution and redressal. This approach reflects our dedication to community engagement, operational excellence, and responsible service delivery.

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

	FY 2024–25	PY 2023–24
Directly sourced from MSMEs/ small producers	4.51%	8.84%
Sourced directly from within the district and neighbouring districts	100%	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:**

	FY 2024–25	PY 2023–24
1. Rural		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non–permanent / on contract basis)	–	–
ii) Total Wage Cost	–	–
iii) % of Job creation in Rural areas	–	–
2. Semi–urban		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non–permanent / on contract basis)	–	–
ii) Total Wage Cost	–	–
iii) % of Job creation in Semi–Urban areas	–	–
3. Urban		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non–permanent / on contract basis)	38,495,650	25,704,418
ii) Total Wage Cost	79,217,262	6,90,97,897
iii) % of Job creation in Urban areas	44.6%	32.7%
4. Metropolitan		
i) Disclose wages paid to persons employed (including employees or workers employed on a permanent or non–permanent / on contract basis)	40,721,612	43,393,479
ii) Total Wage Cost	79,217,262	6,90,97,897
iii) % of Job creation in Metropolitan area	51.4%	62.8%

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

Essential Indicators

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

Although there is no direct obligation with the consumers of the telecom network, a robust Customer-wise (mobile network operating companies) Governance Framework and Key Account Management Structure are firmly established, facilitating structured engagement with customers at both the Corporate and Operating Circle levels. These periodic reviews encompass critical operational dimensions including:

- **Network Operations:** Performance monitoring, uptime assurance, and service quality
- **Energy Management:** Efficiency initiatives, renewable integration, and cost optimization
- **Project Execution:** Planning and rollout of new sites, upgrades to existing infrastructure, and receivables management

Recognizing telecom infrastructure as a vital enabler of connectivity, especially during emergencies/force majeure, the company collaborates proactively with customers to formulate and implement Network availability plan designed to ensure:

- Minimal disruption during natural calamities or force majeure events
- Rapid response and site restoration
- Seamless coordination for uninterrupted service delivery
- Availability of fuel/vehicles to reach the sites

This governance mechanism reinforces our commitment to operational resilience, customer satisfaction, sustainable infrastructure development and access to communication to the communities residing near our towers.

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

Particulars	As a percentage to total turnover
Environmental and social parameters relevant to the product	Not Applicable
Safe and responsible usage	Not Applicable
Recycling and/or safe disposal	Not Applicable

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

Particulars	FY (2024–25)		Remark	PY (2023–24)		Remark
	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	–

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

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

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy?

Yes, the company has a well-defined Data Privacy and Cyber Security Policy that is accessible to the employees on the Intranet

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

Not Applicable

7. Provide the following information relating to data breaches:

- a. **Number of instances of data breaches along-with impact**
Nil
- b. **Percentage of data breaches involving personally identifiable information of customers**
0%