



# **BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT**

**HATHWAY CABLE AND DATACOM LIMITED**

**Financial Year 2024-25**

# Business Responsibility & Sustainability Report (BRSR)

## SECTION A: GENERAL DISCLOSURE

### I. Details of the Listed Entity

1.	<b>Corporate Identity Number (CIN) of the Listed Entity</b>	L64204MH1959PLC011421		
2.	<b>Name of the Listed Entity</b>	Hathway Cable and Datacom Limited ("Company" or "Hathway")		
3.	<b>Year of incorporation</b>	1959		
4.	<b>Registered office address</b>	8 <sup>th</sup> Floor, Interface-11, Link Road, Malad West, Mumbai, Maharashtra – 400064		
5.	<b>Corporate address</b>	8 <sup>th</sup> Floor, Interface-11, Link Road, Malad West, Mumbai, Maharashtra – 400064		
6.	<b>E-mail</b>	<a href="mailto:info@hathway.net">info@hathway.net</a>		
7.	<b>Telephone</b>	022 40542500		
8.	<b>Website</b>	<a href="http://www.hathway.com">www.hathway.com</a>		
9.	<b>Financial year for which reporting is being done</b>	1 <sup>st</sup> April 2024 to 31 <sup>st</sup> March 2025		
10.	<b>Name of the Stock Exchange(s) where shares are listed</b>	National Stock Exchange of India Limited (NSE) and BSE Limited (BSE)		
11.	<b>Paid-up Capital</b>	₹ 354.02 crores		
12.	<b>Contact Person</b>			
	<b>Name of the Person</b>	Ajay Singh		
	<b>Telephone</b>	022 40542500		
	<b>Email address</b>	<a href="mailto:info@hathway.net">info@hathway.net</a>		
13.	<b>Reporting Boundary</b>			
	<b>Type of Reporting</b>	Standalone Basis		
	<b>If selected consolidated:</b>	<b>Sr. No.</b>	<b>Name of the Subsidiaries/ JVs/ Associate Companies</b>	<b>CIN Number</b>
		1	Not Applicable	Not Applicable
14.	<b>Name of assessment or assurance provider</b>	-		
15.	<b>Type of assessment of assurance obtained</b>	-		

### II. Product/ Services

16.	<b>Details of business activities</b> (accounting for 90% of the turnover)	<b>Sr. No.</b>	<b>Description of Main Activity</b>	<b>Description of Business Activity</b>	<b>% Turnover of the Entity</b>
		1	Information and communication	Wired, Wireless and Satellite Telecommunication activities	100%
17.	<b>Products/Services sold by the entity</b> (accounting for 90% of the entity's turnover)	<b>Sr. No.</b>	<b>Product/Service</b>	<b>NIC Code</b>	<b>% of Total Turnover contributed</b>
		1	Broadband Service	61104	100%

### III. Operations

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

19. Market served by the entity	Locations	Numbers
(i) No. of Locations	National (No. of States)	10 (including 1 Union Territory)
	International (No. of Countries)	NA
(ii) What is the contribution of exports as a percentage of the total turnover of the entity?		Nil
(iii) A brief on types of customers	<p>Hathway is committed to delivering high-speed wired internet connectivity through its Broadband and Internet Leased Line (ILL) services, catering to both Business-to-Business (B2B) and Business-to-Consumer (B2C) segments across India. Our diverse customer base includes:</p> <ol style="list-style-type: none"> <li><b>Residential Customers:</b> We provide high-speed Broadband services tailored to meet the needs of individual households, ensuring seamless connectivity for entertainment, education, and remote work.</li> <li><b>Non-Residential Customers:</b> Our Broadband services also extend to retail businesses, offering reliable internet solutions that support their operational needs.</li> <li><b>Internet Leased Line (ILL) Customers:</b> This service is exclusively available to Non-Residential clients, which encompasses Small and Medium Enterprises (SMEs) and Corporates. We understand the critical importance of uninterrupted connectivity for these businesses, and our ILL services are designed to deliver consistent and high-performance internet access.</li> </ol>	

#### IV. Employees

##### 20. Details as at the end of Financial Year:

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>a. Employees and workers (including differently abled)</b>						
<b>Employees</b>						
1	Permanent Employees (D)	241	230	95%	11	5%
2	Other than Permanent Employees (E)	113	107	95%	6	5%
3	<b>Total Employees (D+E)</b>	<b>354</b>	<b>337</b>	<b>95%</b>	<b>17</b>	<b>5%</b>
<b>Workers</b>						
4	Permanent (F)	62	58	94%	4	6%
5	Other than Permanent (G)	3,455	3,279	95%	176	5%
6	<b>Total Workers (F+G)</b>	<b>3,517</b>	<b>3,337</b>	<b>95%</b>	<b>180</b>	<b>5%</b>
<b>b. Differently abled employees and workers</b>						
<b>Differently abled Employees</b>						
7	Permanent (D)	0	0	0	0	0
8	Other than Permanent (E)	0	0	0	0	0
9	<b>Total Employees (D+E)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Differently abled Workers</b>						
10	Permanent (F)	0	0	0	0	0
11	Other than Permanent (G)	0	0	0	0	0
12	<b>Total Differently Abled Employees (F+G)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 21. Participation/Inclusion/Representation of women

Sr. No.	Category	Total (A)	No. and % of females	
			No. (B)	% (B/A)
1	Board of Directors	6	2	33.33%
2	Key Management Personnel	3	0	0%

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

Category	FY 2024-25 (Turnover rate in current FY)			FY 2023-24 (Turnover rate in previous FY)			FY 2022-23 (Turnover rate in the year prior to previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	15.2%	10.5%	12.8%	24.3%	10.5%	21.2%	17.1%	10.5%	16.9%
Permanent Workers	8.3%	0.0%	4.2%	8.2%	0.0%	6.5%	7.8%	0.0%	7.1%

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

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

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures	Indicate whether it is a Holding / Subsidiary / Associate / or Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	*Channels India Network Private Limited	Subsidiary	100%	No
2	*Elite Cable Network Private Limited	Subsidiary	100%	No
3	*Hathway Bhaskar CCN Multi Entertainment Private Limited	Subsidiary	100%	No
4	*Hathway Cable MCN Nanded Private Limited	Subsidiary	100%	No
5	*Hathway Kokan Crystal Cable Network Limited	Subsidiary	100%	No
6	Hathway Digital Limited	Subsidiary	100%	No
7	Hathway Mantra Cable & Datacom Limited	Subsidiary	100%	No
8	Hathway Nashik Cable Network Private Limited	Subsidiary	90.06%	No
9	Chennai Cable Vision Network Private Limited	Subsidiary	75.99%	No
10	Hathway Sonali OM Crystal Cable Private Limited	Subsidiary	68%	No
11	Hathway Bhawani Cabletel & Datacom Limited	Subsidiary	51.60%	No
12	Hathway Channel 5 Cable & Datacom Private Limited	Subsidiary	51%	No
13	Hathway Ice Television Private Limited	Subsidiary	51%	No
14	Hathway Latur MCN Cable & Datacom Private Limited	Subsidiary	51%	No
15	Hathway MCN Private Limited	Subsidiary	51%	No
16	Hathway Bhawani NDS Network Limited	Subsidiary	26.32%	No
17	@Hathway Dattatray Cable Network Private Limited	Subsidiary	51%	No
18	@Hathway Sai Star Cable & Datacom Private Limited	Subsidiary	51%	No
19	Hathway SS Cable & Datacom LLP	Associate	51%	No

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures	Indicate whether it is a Holding / Subsidiary / Associate / or Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
20	GTPL Hathway Limited	Associate	37.32%	No
21	Pan Cable Services Private Limited	Associate	33.33%	No
22	Hathway VCN Cablenet Private Limited	Associate	25.03%	No
23	#Hathway Prime Cable & Datacom Private Limited	Subsidiary	-	No

**Note:**

\* Amalgamated with Hathway Digital Limited. The appointed date of the Scheme of Amalgamation was January 01, 2025.

@ The investment in equity shares has been re-classified and measured as financial assets (passive investment) in terms of Ind AS-109 w.e.f. March 31, 2025.

# Ceased to be subsidiary of the Company, pursuant to sale of its entire 51% equity stake (i.e. 2,29,500 equity shares) w.e.f. September 09, 2024.

**VI. CSR Details**

24.	a.	<b>Whether CSR is applicable as per section 135 of Companies Act, 2013:</b>	Yes, CSR is applicable as per section 135 of the Companies Act, 2013 to the Company.
		<b>Turnover (in ₹)</b>	6,02,12,37,907
		<b>Net worth (in ₹)</b>	47,05,11,33,941

**VII. Transparency and Disclosures Compliances**
**25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct.**

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)	If Yes, then provide web-link for grievance redress policy	FY 2024-25			FY 2023-24		
			Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	No*	Nil	Nil	No Remark	Nil	Nil	No Remark
Investors (other than shareholders)	Yes	<a href="#">ESG Policy</a> &	Nil	Nil	No Remark	Nil	Nil	No Remark
Shareholders	Yes	<a href="#">Vigil Mechanism and Whistle-blower Policy</a>	Nil	Nil	No Remark	Nil	Nil	No Remark
Employees and workers	Yes	<a href="#">Hathway Customer Service - Customer Support</a>	Nil	Nil	No Remark	Nil	Nil	No Remark
Customers*	Yes	<a href="#">Hathway Customer Service - Customer Support</a>	Customer complaints are resolved as per applicable legislations, including sector specific regulatory provisions under the Telecom Consumers Complaint Redressal Regulation, 2012 issued by Telecom Regulatory Authority of India ("TRAI") and to the extent applicable, are also reported to the regulator as per the reporting requirement prescribed thereunder.					
Value Chain Partners	Yes	No*	Nil	Nil	No Remark	Nil	Nil	No Remark

**Note:** \*While an internal mechanism for grievance redressal is in place, the policy is not required to be hosted on the Company's website as per statutory compliance requirements.

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

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

<b>Material Issue Identified</b>	<b>Indicate whether risk or opportunity</b>	<b>Rationale for identifying the risk/opportunity</b>	<b>In case of risk, approach to adapt or mitigate</b>	<b>Financial implications of the risk or opportunity (Indicate positive or negative implications)</b>
Climate Change Action	Risk	Climate change poses significant threats to business continuity, with extreme weather events leading to supply chain disruptions, increased operational costs, and potential damage to infrastructure. Additionally, regulatory frameworks are evolving to enforce stricter environmental standards, making compliance essential to avoid legal repercussions and reputational damage.	The Company actively implements sustainable practices and assesses climate change impacts on its operations. Emphasizing transparency and stakeholder engagement, we strengthen our ESG Policy to guide our activities. This concerted effort aims to create sustainable value amidst climate challenges.	Negative
Energy usage and management	Risk	Inefficient energy management can lead to inflated operational costs and increased carbon emissions, which not only harm the environment but also expose the Company to regulatory scrutiny and potential penalties. As energy prices fluctuate, reliance on non-renewable sources can create financial instability, impacting long-term sustainability goals.	The Company focuses on implementing energy-efficient technologies and strategizing the adoption of renewable energy sources, enhancing operational resilience and reducing costs. Building capacity for energy efficiency measures is integral to optimizing practices and ensuring long-term viability.	Negative
Electronic Waste Management and Circular Economy	Opportunity	The growing volume of electronic waste presents a unique opportunity for Hathway to lead in sustainability by adopting circular economy principles. By effectively managing electronic waste, the Company can not only reduce environmental impact but also tap into new revenue streams through recycling and refurbishment, enhancing its market position as a responsible business.	Hathway is establishing partnerships with recycling firms, investing in advanced recycling technologies, and developing product designs focused on reuse and recyclability. We implement take-back programs and educate consumers on responsible disposal to maximize value extraction.	Positive

Material Issue Identified	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
Employee well-being and growth	Opportunity	Prioritising employee well-being is essential for cultivating a motivated workforce. A focus on mental health, professional development, and work-life balance can lead to higher productivity, lower turnover rates, and an enhanced employer brand. Investing in employees not only drives innovation but also positions the Company as an attractive employer in a competitive job market.	Hathway implements comprehensive wellness programs, offering professional development opportunities and creating a supportive work environment. We prioritize training to equip employees with relevant skills for career advancement.	Positive
Workplace diversity	Opportunity	Embracing diversity within the workplace is crucial for driving innovation and improving decision-making processes. A diverse workforce brings varied perspectives that can enhance problem-solving and creativity, ultimately leading to better business outcomes. By prioritising diversity, Hathway can also strengthen its reputation and appeal to a broader customer base.	The Company seeks to hire more females to balance the workforce's gender ratio. By celebrating unique perspectives, we accelerate innovation and broaden equal opportunities for employee growth.	Positive
Health and Safety	Risk	The health and safety of employees are paramount to maintaining operational efficiency and productivity. Neglecting these aspects can lead to workplace accidents, legal liabilities, and a decline in employee morale. A strong commitment to health and safety not only protects employees but also enhances the Company's reputation as a responsible employer.	Our employee welfare policy prioritizes health and safety, guiding efforts to provide safe and hygienic working conditions. A conducive workplace is essential for employee satisfaction and organizational success.	Negative
Human Rights	Risk	Upholding human rights is fundamental to maintaining a positive workplace culture and avoiding disruptions in operations. Failure to address human rights issues can lead to reputational damage, legal challenges, and a loss of stakeholder trust. By prioritising human rights, the Company can ensure a stable and motivated workforce, which is essential for long-term success.	The Company has a human rights policy that outlines acceptable workplace behaviour, ensuring the protection of employee rights and preventing forced or child labour. Awareness-building programs and grievance channels reinforce our commitment.	Negative

<b>Material Issue Identified</b>	<b>Indicate whether risk or opportunity</b>	<b>Rationale for identifying the risk/opportunity</b>	<b>In case of risk, approach to adapt or mitigate</b>	<b>Financial implications of the risk or opportunity (Indicate positive or negative implications)</b>
Customer Relations	Opportunity	Establishing strong customer relations is vital for building brand loyalty and enhancing customer satisfaction. By understanding and responding to customer needs, Hathway can differentiate itself in a competitive market, leading to increased customer retention and positive word-of-mouth referrals. A customer-centric approach is essential for long-term business success.	Hathway is committed to providing a differentiated value proposition and unparalleled customer experience. Our Responsible Marketing policy ensures fair treatment and open communication with customers.	Positive
Responsible value chain	Risk	Ensuring ethical practices throughout the value chain is critical for maintaining quality and safety standards. Any lapses can lead to reputational damage, legal issues, and disruptions in supply. By addressing these concerns, the Company can enhance its credibility and build stronger relationships with stakeholders, ultimately driving sustainable growth.	Our policy on related party transactions and ESG Policy ensures accountability among value chain partners, promoting transparency and ethical conduct. A vetting process and contractual agreements uphold fair practices.	Negative
Community Welfare and Development	Opportunity	Engaging in community welfare initiatives not only enhances the Company's reputation but also contributes to social stability and economic development. By investing in local communities, Hathway can create a positive impact, strengthen stakeholder relationships, and align its operations with broader societal goals, leading to long-term sustainability.	The Company implements developmental programmes that foster community upliftment and generate sustainable socioeconomic benefits. Our EHS and Sustainable Development policies emphasise equitable access to resources.	Positive
Board Ownership and Control	Opportunity	Establishing clear governance structures is essential for ensuring accountability and transparency at the highest levels of the organisation. A well-defined board ownership and control mechanism can enhance decision-making processes and build stakeholder confidence, ultimately contributing to the Company's long-term success.	The Company regularly reviews its governance policies and practices to ensure alignment with best practices and regulatory requirements. We provide ongoing training to board members on governance issues and establish clear succession planning to ensure continuity and stability in leadership.	Positive



Material Issue Identified	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
Business Ethics and Integrity	Opportunity	Upholding high standards of ethics and integrity is vital for building stakeholder trust and enhancing the Company's reputation. A strong ethical framework guides decision-making and fosters a culture of accountability, which is essential for sustainable business practices and long-term success.	Our Code of Conduct integrates a commitment to business ethics across all operations. We maintain a confidential reporting mechanism for ethical concerns, ensuring that all employees can voice their concerns without fear of retaliation, promoting a culture of integrity throughout the workforce and partnerships.	Positive
Data Privacy and Security	Risk	Protecting data privacy and security is critical in an increasingly digital world. Cybersecurity threats can lead to significant financial losses, reputational damage, and legal liabilities. By prioritising data protection, the Company can safeguard its operations and maintain the trust of customers and stakeholders.	The Company enforces a risk management policy, identifying risks and developing mitigation plans. A dedicated cybersecurity team and implemented measures protect against data breaches.	Negative
Accountability and Transparency	Opportunity	Ensuring accountability and transparency in management processes is essential for building trust with stakeholders. By establishing clear performance metrics and reporting mechanisms, the Company can enhance its credibility and drive continuous improvement, ultimately contributing to long-term success.	We have defined KPIs that align individual goals with organisational objectives. Additionally, we engage stakeholders in meaningful discussions about our progress and challenges, promoting a culture of transparency and accountability throughout the organisation. This approach creates synergy in performance evaluation and enhances overall accountability.	Positive
Fair Marketing & Transparency	Risk	Maintaining transparent and fair marketing practices is crucial for protecting the Company's reputation and ensuring customer trust. Misleading marketing can lead to customer dissatisfaction, legal repercussions, and damage to brand equity. By prioritising clear communication, the Company can enhance customer relationships and mitigate risks.	Our responsible marketing policy ensures clarity and accuracy in service offerings, preventing misinformation that could harm the brand. Customer surveys secure transparent feedback on user experience.	Negative

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and Management Processes</b>									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the Policies, if available	<a href="#">Policies  Hathway</a>								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes, the Company has established a robust Code of Conduct for its business associates. The scope of these policies is thoughtfully extended to our partners, ensuring sustainability throughout the value chain. This inclusive approach not only emphasises the Company's commitment to sustainability but also cultivates a collaborative environment where all stakeholders are united in their pursuit of shared value and the promotion of positive change.								
4. Name of the national and international codes/certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The Company utilises telecommunication equipment comprising Optical Network Units (ONUs) that are certified by the Telecommunication Engineering Centre (TEC), a nationally recognised body under the Department of Telecommunications, Government of India. This certification signifies adherence to established standards of quality, safety, and performance relevant to the telecommunications sector. By aligning its equipment with TEC specifications, the Company ensures the provision of reliable, secure, and efficient broadband and cable services. The use of such certified technology reflects a consistent approach to maintaining operational integrity and complying with applicable regulatory expectations.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	As part of its commitment to responsible and sustainable practices, the Company has been proactively addressing environmental and social concerns through its business activities. In its pursuit of continuous improvement, the organisation is working towards setting up ESG targets and devising a structured roadmap to achieve its goal of building a sustainable business.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Performance against targets, will be disclosed transparently in the coming years as the Company is currently working towards setting up the ESG specific targets.								

### Governance, Leadership and Oversight

#### 7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements.

As Hathway embarks on its third year of Business Responsibility and Sustainability Reporting (BRSR) for FY2025, we reaffirm our commitment to integrating ESG principles into our core business strategy. This journey has presented us with both challenges and opportunities that have shaped our approach to conducting business responsibly.

The adoption of sustainable and resilient practices is essential for organisations to effectively navigate these challenges. As a service industry entity, we strive to deliver the highest quality services to our customers while prioritising sustainability. Our growth journey is characterised by fair and ethical practices, a diverse and inclusive culture, and operations that contribute to societal progress and environmental stewardship. We are dedicated to implementing practices that reduce energy consumption, conserve water, manage waste, and recycle electronic waste.

We recognise the importance of embedding ESG practices into our operations. Consequently, the Company has initiated its ESG strategy journey and established a robust governance structure. In the previous financial year, we defined our strategic pillars and KPIs.

As an organisation, we are committed to achieving the highest standards of quality across these dimensions. Numerous policies are already in place to monitor our operations, and we will continue to adopt new policies and amend existing ones in response to evolving trends and regulatory requirements, ensuring we meet our targets and effectively address challenges.

**Governance, Leadership and Oversight**

As we move forward, we remain focused on our ESG targets and are determined to create sustainable value for all our stakeholders. By confronting these challenges directly and celebrating our achievements, we can continue to build a responsible and resilient organisation.

Thank you for your continued support as we strive to make a positive impact on our environment and society.

**8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).** The highest authority responsible for overseeing the implementation of the Business Responsibility Policy is the Board of Directors, and the Board Committee 'Business Responsibility Sustainability Committee' (BRSC). By positioning the Board at the forefront of this initiative, Hathway ensures that the implementation of its Business Responsibility Policy receives the highest level of attention and strategic guidance from its senior-most leadership.

This governance structure underscores our commitment to integrating responsible business practices into our operations and decision-making processes. The Board and the BRSC play a crucial role in monitoring progress, addressing challenges, and ensuring alignment with our sustainability goals.

For further details, kindly refer to the Board's Report and Corporate Governance Report in the Company's Annual Report.

**9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.** Yes. The Company has established a Business Responsibility and Sustainability Committee (BRSC) to guide the development and implementation of its ESG related goals and initiatives. The BRSC is comprised of Mr. Viren Raheja and Mr. Saurabh Sancheti, both of whom are the Non-Executive Directors of the Company. This committee plays a vital role in ensuring the Company's sustainability efforts are executed effectively and yield the desired impact.

The role of the BRSC is outlined below:

- **Policy formulation:** To develop and recommend comprehensive policies or frameworks to the Board that align with the BRSR and other sustainability frameworks, while incorporating ESG principles. The Committee is also responsible for suggesting appropriate modifications to these policies as needed.
- **Implementation Oversight:** To oversee the effective implementation of the BRSR Policy or framework within the Company, ensuring alignment with our sustainability objectives.
- **Performance Review:** To review the performance of business sustainability goals, targets, and strategies, providing guidance to the Company to achieve these objectives. The Committee may appoint consultants or advisors as needed to enhance their expertise and support their initiatives.
- **Board Recommendations:** To review, recommend the requirements and modifications of the BRSR report to the Board for approval, ensuring that all sustainability initiatives are aligned with the Company's strategic vision.
- **Advisor Appointments:** To appoint advisors or consultants to assist the Committee in its work, ensuring access to the necessary expertise.
- **Delegation of Authority:** To authorise any other official of the Company to assist the Committee in the implementation and execution of the BRSR Aligned Policy, carrying out all functions entrusted to them by the Board of Directors and in accordance with applicable provisions of the Companies Act, 2013, and other relevant regulations, including the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

In total, the Company has established eight different committees dedicated to addressing the needs of various stakeholder groups and overseeing the implementation of relevant initiatives, thereby reinforcing our commitment to responsible business practices.

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
<b>Performance against above policies and follow up action</b>	Yes, a Board-level Committee actively monitors performance on the Policies . The Committee closely evaluates how the Company is performing and how it can function better.									The Company reviews all its policies every 2-3 years as per the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI LODR). In addition, the Company revisits its policies whenever there are changes in regulations or business requirements.								
<b>Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances</b>	Yes, the Board and the relevant Committee, as applicable, oversee compliance and maintaining records. The Annual Report, as applicable, is also submitted to the appropriate government department each year.																	

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency	P1	P2	P3	P4	P5	P6	P7	P8	P9
	No	No	No	No	No	No	No	No	No

12. If answer to question (1) above is “No” i.e., not all Principles are covered by a policy, reasons to be stated:	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes/No)									
The entity is not at a stage where it is able to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									Not Applicable
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

**SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE**

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



Hathway recognises that while business activities play a vital role in improving human well-being, they may also give rise to environmental and societal impacts. The Company believes that responsible conduct is essential in managing these effects and ensuring long-term value creation for all stakeholders. With this perspective, Hathway continues to shape its operations around the principles of ethical governance, transparency in decision-making, and accountability across all levels of the organisation. The Company strives to maintain a balanced approach that considers the interests of shareholders, investors, customers, employees, and the broader community, while being mindful of its environmental responsibilities. Compliance with applicable laws and regulations forms the basis of the Company’s operating model. Beyond compliance, Hathway ensures that its systems and processes support fair practices, discourage any form of misconduct, and promote an environment of openness and trust. Through these efforts, the Company aims to reinforce a culture where integrity is reflected not only in policies, but also in day-to-day business behaviour.

**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
<b>Board of Directors</b>	1	Understanding on Business Responsibility and Sustainability Reporting requirements and 9 Principles	100%
<b>Key Management Personnel</b>	4	1. Code of Conduct 2. Anti-Bribery and Anti-Corruption Policy 3. Prevention of Sexual Harassment Policy 4. Information Security Awareness Course	100%
<b>Employees other than BODs and KMPs</b>	4	1. Code of Conduct 2. Anti-Bribery and Anti-Corruption Policy 3. Prevention of Sexual Harassment Policy 4. Information Security Awareness Course	100%
<b>Workers</b>	4	1. Code of Conduct 2. Anti-Bribery and Anti-Corruption Policy 3. Prevention of Sexual Harassment Policy 4. Information Security Awareness Course	100%

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

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

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

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

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

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

Yes, Hathway has adopted Anti-Bribery and Anti-Corruption (ABAC) Policy aimed at promoting ethical business conduct and ensuring compliance with applicable legal requirements. The policy sets out a clear prohibition on all forms of bribery and corruption, including the offering, promising, giving, or accepting of any form of inducement, payment, reward, or advantage - either directly or indirectly – with the intent to improperly influence business outcomes.

This policy applies uniformly to all directors, officers, employees, and third parties acting on behalf of the Company, including business partners, suppliers, contractors, and consultants. It reinforces a zero-tolerance approach towards bribery and corruption, supporting the Company’s broader efforts to uphold integrity and transparency across all operations.

Preventive measures outlined in the policy includes regular training, awareness sessions, incident reporting mechanism, internal investigation, and remediation procedures to address potential bribery-related risks. The policy is subjected to periodic reviews and audits to evaluate its effectiveness and ensure continued alignment with evolving anti-corruption standards.

The Company encourages all personnel and associated business partners to report any concerns or instances of improper solicitations / conduct. Reports are treated confidentially, and individuals are protected against any form of retaliation. The oversight of the policy implementation and complaint resolution rests with the Chief of Internal Affairs.

The ABAC Policy is publicly accessible on the Company’s website. To view the policy click [here](#).

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

Category	FY 2024-25	FY 2023-24
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

6. Details of complaints regarding conflict of interest:

Topic	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	-	0	-
Number of complaints received in relation to issues of Conflict of Interest of KMPs	0	-	0	-

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

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

8. Number of days of accounts payables ((Accounts payable \*365) / Cost of goods/services procured) in the following format:

	FY 2024-25	FY 2023-24
Number of days of accounts payables	51	51

9. Open-ness of business

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

Parameters	Metrics	FY 2024-25	FY 2023-24
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	Nil	Nil
	b. Number of trading houses where purchases are made from	Nil	Nil
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	Not Applicable	Not Applicable
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	1.43%	1.43%
	b. Number of dealers / distributors to whom sales are made	522	470
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers / distributors	19.44%	2.91%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	6.62%	6.43%
	b. Sales (Sales to related parties / Total Sales)	0.03%	0.08%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	45.25%	68.14%
	d. Investments (Investments in related parties / Total Investments made)	71.81%	75.35%

## LEADERSHIP INDICATORS

1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year:

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
---	--	--

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

2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/ No) If Yes, provide details of the same.

Yes, the Company has instituted processes to identify, avoid, and manage potential conflicts of interest involving members of the Board. A dedicated Code of Conduct applicable to Board members sets out clear expectations regarding ethical behaviour, professional integrity, and the management of situations that could give rise to conflicts.

This Code specifically addresses the requirement for directors to disclose any personal, financial, or other interests that may, or may be perceived to, conflict with their responsibilities towards the Company.

By embedding these practices into its governance framework, the Company seeks to uphold transparency and ensure that decisions at the Board level are made in the best interest of the organisation and its stakeholders. Regular declarations of interest, compliance confirmations, and ongoing oversight further strengthen the effectiveness of this mechanism.

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



Hathway recognises the growing urgency of addressing climate change and other environmental challenges that pose risks to both present and future generations. The Company has articulated its commitment to sustainability through a defined ESG Policy, which sets the direction for integrating environmental considerations into its operational and strategic decisions. With a focus on minimising its environmental footprint, the Company seeks to contribute towards a cleaner environment and a safer, more resilient society. This is pursued by adopting technologies and practices that are safe, resource-efficient, and designed to reduce emissions and waste arising from its operations. The Company also encourages the integration of similar principles across its supply chain, fostering responsible production and consumption practices among its partners. Hathway views sustainability not only as an environmental imperative but also to enhance quality of life and preserve natural resources. Through continuous improvements and responsible choices, the Company aims to embed sustainable thinking within the broader business ecosystem it operates in.

### 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.**

Type	FY 2024-25	FY 2023-24	Details of improvement in social and environmental aspects
<b>Research &amp; Development (R&amp;D)</b>	Nil	Nil	Nil
<b>Capital Expenditure (CAPEX)</b>	55.43%	58.93%	The Company has made significant investments in implementing a Gigabit-capable Passive Optical Network (GPON) Field network. This is a passive network that doesn't require power and will help reduce the Company's carbon footprint. It replaces the Data Over Cable Service Interface Specification (DOCSIS) field network elements, which is an energy-intensive solution with high power consumption.

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

No, the Company does not currently have a formal procedure dedicated exclusively to sustainable sourcing. However, a Code of Conduct for business associates is in place, which outlines the expectations for ethical, responsible, and legally compliant behaviour when engaging in business with the Company. This Code also highlights the importance of sustainable practices, with references to environmental, social, and governance (ESG) considerations.

While a structured sustainable sourcing policy is yet to be adopted, the Company actively encourages its suppliers and partners to align with responsible business conduct. Compliance with applicable legal and regulatory requirements is monitored on a regular basis. In addition, the Company provides support to its partners in their efforts to incorporate more sustainable practices within their own operations.

Looking ahead, the Company intends to formalise a sustainable sourcing framework that will further promote the adoption of voluntary, ESG-aligned practices across a wider segment of its vendor base. These future initiatives are expected to foster a stronger culture of sustainability across the supply chain and enhance the Company's contribution to environmental and societal well-being.

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

Not Applicable



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

Product	Process to safely reclaim the product
a. <b>Plastics (including packaging)</b>	Not Applicable
b. <b>E-Waste</b>	<p>Hathway operates primarily as a service provider and does not engage in manufacturing activities. However, in the course of its operations, certain hardware components, such as Optical Network Units (ONUs), may reach end-of-life or become faulty and unusable. To manage such e-waste responsibly, the Company has instituted a defined process for safe disposal through government-authorised and certified e-waste recyclers, in compliance with all applicable environmental regulations.</p> <p>In addition to responsible disposal, the Company promotes resource efficiency by prioritising the reuse of functional equipment. ONUs recovered from customer premises are collected through the Company's network of local connection offices. These units undergo a refurbishment process and are redeployed wherever feasible, thereby extending their lifecycle and reducing the generation of avoidable e-waste.</p> <p>This dual approach i.e. combining regulated disposal with refurbishment and reuse, reflects Hathway's efforts to contribute to a circular economy and minimise its environmental impact.</p>
c. <b>Hazardous Waste</b>	Not Applicable
d. <b>Other Waste</b>	Not Applicable

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Not Applicable as it is a service industry.

**LEADERSHIP INDICATORS**

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

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

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

Not applicable

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

Indicated input Material	Recycled or re-used input material to total material	
	FY 2024-25	FY 2023-24
Not Applicable.		

Note: Optical Network Units (ONUs), DOCSIS / Modems are provided to customers as a part of the Company's broadband services. The Company does not manufacture any products.

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

	FY 2024-25			FY 2023-24		
	Reused	Recycled	Safely Disposed	Reused	Recycled	Safely Disposed
Plastics (including packaging)	NA	NA	NA	NA	NA	NA
E-waste	47.08	23.03	Nil	44.77	13.71	Nil
Hazardous waste	NA	NA	NA	NA	NA	NA
Other waste	NA	NA	NA	NA	NA	NA

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

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
Dual Band ONU	34
Single Band ONU	100
DOCSIS / Modem	71

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

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


Hathway places strong emphasis on upholding the dignity, safety, and fair treatment of all individuals working within the organisation and across its value chain. The Company recognises that its people are central to sustained growth and strives to provide a workplace environment that is respectful, inclusive, and conducive to personal and professional development. To this end, Hathway has implemented a range of policies and systems designed to ensure equal access to opportunities, fair and competitive compensation, and a safe and supportive work environment. These include frameworks for employee engagement, structured grievance redressal mechanisms, and initiatives that encourage continuous learning and career progression. Health and safety remain a core priority, with procedures in place to mitigate occupational risks and promote employee well-being. The Company's approach reflects its broader aim to cultivate a work culture rooted in fairness, transparency, and respect for human rights, across both its direct workforce and those engaged through third-party arrangements.

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

Category	Total (A)	% of employees covered by									
		Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
<b>Permanent Employees</b>											
Male	230	230	100%	230	100%	0	0%	230	100%	0	0%
Female	11	11	100%	11	100%	11	100%	0	0%	0	0%
<b>Total</b>	<b>241</b>	<b>241</b>	<b>100%</b>	<b>241</b>	<b>100%</b>	<b>11</b>	<b>5%</b>	<b>230</b>	<b>95%</b>	<b>0</b>	<b>0%</b>
<b>Other than Permanent Employees</b>											
Male	107	107	100%	107	100%	0	0%	0	0%	0	0%
Female	6	6	100%	6	100%	6	100%	0	0%	0	0%
<b>Total</b>	<b>113</b>	<b>113</b>	<b>100%</b>	<b>113</b>	<b>100%</b>	<b>6</b>	<b>5%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

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

Category	Total (A)	% of workers covered by									
		Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
<b>Permanent Workers</b>											
Male	58	58	100%	58	100%	0	0%	58	100%	0	0%
Female	4	4	100%	4	100%	4	100%	0	0%	0	0%
<b>Total</b>	<b>62</b>	<b>62</b>	<b>100%</b>	<b>62</b>	<b>100%</b>	<b>4</b>	<b>6%</b>	<b>58</b>	<b>94%</b>	<b>0</b>	<b>0%</b>
<b>Other than Permanent Workers</b>											
Male	3,279	3,279	100%	3,279	100%	0	0%	0	0%	0	0%
Female	176	176	100%	176	100%	176	100%	0	0%	0	0%
<b>Total</b>	<b>3,455</b>	<b>3,455</b>	<b>100%</b>	<b>3,455</b>	<b>100%</b>	<b>176</b>	<b>5%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

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

	FY 2024-25	FY 2023-24
<b>Cost incurred on well-being measures as a % of total revenue of the Company</b>	0.31%	0.33%

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

Sr. No.	Benefits	FY 2024-25			FY 2023-24		
		No. of employees covered as a % of total employees	No. of workers covered as a % of total worker	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total worker	Deducted and deposited with the authority (Y/N/N.A.)
1	PF	100%	100%	Y	100%	100%	Y
2	Gratuity	100%	100%	Y*	100%	100%	Y*
3	ESIC	0%	18%	Y	0%	38%	Y
4	Others-NPS- National Pension Scheme (voluntary)	5%	0%	Y	5%	0%	Y

\* Funding with Trust for On-Roll Employees

3. Accessibility of workplaces:

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

Yes, the Company's offices are situated within commercial establishments that are designed to be accessible to differently abled employees and workers, in line with the requirements of the Rights of Persons with Disabilities Act, 2016. These premises are equipped with accessibility features such as elevators and wheelchair access to facilitate ease of movement. In addition, each office location has designated support staff, including reception personnel, who are available to assist differently abled individuals as required. This arrangement ensures that support is readily available and responsive to individual needs. Through these measures, the Company reaffirms its commitment to creating an inclusive, safe, and enabling work environment that respects and accommodates the diverse needs of its workforce.

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

The Company does not currently have a standalone Equal Opportunity Policy in accordance with the Rights of Persons with Disabilities Act, 2016. However, its existing welfare policy outlines a clear stance against any form of discrimination or harassment, including on the grounds of disability. This policy reflects Hathway's ongoing commitment to fostering an inclusive workplace where individuals with disabilities are treated with fairness, dignity, and respect. The Company is in the process of formalising a dedicated Equal Opportunity Policy that will align with the statutory provisions of the Rights of Persons with Disabilities Act, 2016. This initiative forms part of Hathway's broader effort to strengthen its diversity and inclusion practices across all areas of employment.

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	NIL	NIL	NIL	NIL
Female	NIL	NIL	NIL	NIL
<b>Total</b>	<b>NIL</b>	<b>NIL</b>	<b>NIL</b>	<b>NIL</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.

Category	Yes/No	Details of the mechanism in brief
Permanent Workers	Yes	The Company has established mechanisms to receive and redress grievances for all categories of employees and workers through its Vigil Mechanism and Whistle Blower Policy, which provide a structured and confidential channel for raising concerns.
Other than Permanent Workers	Yes	Under this mechanism, any suspected violation of Company policy, applicable laws, or ethical standards may be reported and is subject to appropriate investigation. All disclosures and proceedings during the course of the investigation are treated with strict confidentiality, except where disclosure is necessary to facilitate the process or in accordance with applicable legal requirements.
Permanent Employees	Yes	Concerns may be reported through multiple channels either to the immediate supervisor, via email at <a href="mailto:hcdl.whistleblowercomplaints@hathway.net">hcdl.whistleblowercomplaints@hathway.net</a> , or by submitting a written communication addressed to the Company Secretary and Compliance Officer. To enhance oversight and strengthen ethical governance, the Company has in place Vigil Mechanism and Whistle Blower Policy and has established an Ethics & Compliance Task Force (ECTF), responsible for monitoring adherence to ethical practices. The ECTF reviews reported incidents and provides quarterly updates to the Audit Committee.
Other than Permanent Employees	Yes	Additionally, the Company's POSH Policy provides a dedicated mechanism for addressing complaints related to sexual harassment at the workplace. Complaints under this policy can be submitted to the reporting officer or Head of Department. In instances where these individuals are involved, employees may escalate the concern to the HR Administrator. Full details of the POSH Policy, including procedures and contact points, are available on the Company's website.  For further reference, the Vigil Mechanism and Whistle Blower Policy. To view the policy click <a href="#">here</a> .

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

The company does not recognise any employee/worker associations.

Category	FY 2024-25			FY 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)
<b>Employees</b>						
Male	230	0	0%	248	0	0%
Female	11	0	0%	10	0	0%
<b>Total</b>	<b>241</b>	<b>0</b>	<b>0%</b>	<b>258</b>	<b>0</b>	<b>0%</b>
<b>Workers</b>						
Male	58	0	0%	61	0	0%
Female	4	0	0%	6	0	0%
<b>Total</b>	<b>62</b>	<b>0</b>	<b>0%</b>	<b>67</b>	<b>0</b>	<b>0%</b>

8. Details of training given to employees and workers:

Category	FY 2024-25					FY 2023-24				
	Total (A)	On Health and Safety		On Skill Upgradation		Total (D)	On Health and Safety		On Skill Upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Male	230	0	0%	0	0%	248	0	0%	0	0%
Female	11	0	0%	0	0%	10	0	0%	0	0%
<b>Total</b>	<b>241</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>258</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
<b>Workers</b>										
Male	58	0	0%	0	0%	61	0	0%	0	0%
Female	4	0	0%	0	0%	6	0	0%	0	0%
<b>Total</b>	<b>62</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>67</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

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

The Company has established a clear succession planning process, recognizing it as a vital element of strategic planning. This process is essential for the organisation's success, as it identifies, nurtures, and retains top leadership talent. The Company formulates a development plan for each key role within the organization and assesses individuals' skills to pinpoint critical positions that require a strong succession plan.

Category	FY 2024 -25			FY 2023-24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	230	0	0%	248	248	100%
Female	11	0	0%	10	10	100%
<b>Total</b>	<b>241</b>	<b>0</b>	<b>0%</b>	<b>258</b>	<b>258</b>	<b>100%</b>
<b>Workers</b>						
Male	58	0	0%	61	61	100%
Female	4	0	0%	6	6	100%
<b>Total</b>	<b>62</b>	<b>0</b>	<b>0%</b>	<b>67</b>	<b>67</b>	<b>100%</b>

**Note:** The performance review for FY 2023-24 was done in FY 2024-25 and the performance review for FY 2024-25 is due in FY 2025-26. This prompt assessment will offer valuable insights and support the ongoing enhancement of the organisation's succession planning strategies.

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?**
- The Company has not yet adopted a formal Occupational Health and Safety Management System. However, it remains committed to ensuring a safe and healthy working environment across its operational sites and office locations. Recognising the importance of employee well-being, Hathway has implemented a range of safety measures aimed at mitigating occupational risks and promoting a culture of safety. Technicians working on-site are guided by clearly defined Standard Operating Procedures and are equipped with appropriate Personal Protective Equipment (PPE), including safety kits, gear and shoes. While the current approach may not be formalised under a certified system, the Company's health and safety practices are applied uniformly across its workforce both at field locations and within corporate offices. These measures reflect Hathway's continued efforts to uphold safe workplace practices and support the overall well-being of its employees and contract staff.

- 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 has established internal audit processes to identify work-related hazards and assess risks on both routine and non-routine bases. These mechanisms are applied systematically across operational functions to monitor and evaluate potential safety risks that may arise during day-to-day activities as well as during infrequent or ad hoc tasks. Through periodic inspections and internal reviews, the Company ensures early identification of unsafe conditions or practices, allowing for timely corrective actions. These audits are supported by input from operational teams, supervisors, and safety personnel who are encouraged to report potential hazards, thereby strengthening the preventive safety culture within the organisation.
- c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)** Yes, the Company has processes in place that allow workers to report work-related hazards and, where necessary, remove themselves from situations that pose a threat to their health or safety. Employees are encouraged to report any unsafe conditions, practices, or potential hazards to the Head of Human Resources or their respective supervisors. The Company maintains an open and responsive communication environment that ensures such concerns are addressed promptly and appropriately. Where required, immediate action is taken to mitigate the identified risks and safeguard the individual's well-being.
- d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)** Yes

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

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

\*Including the contract workforce

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

To ensure a safe and healthy workplace, the Company has implemented a range of comprehensive policies and practices, including those relating to Environment, Health and Safety (EHS), the Prevention of Sexual Harassment (POSH), and employee welfare. These frameworks are supported by continuous efforts to enhance working conditions and improve access to medical care.

All office premises are equipped with essential safety provisions such as first aid kits, fire extinguishers, and smoke detectors to enable prompt response in case of emergencies. Additionally, technical field staff are provided with appropriate safety gears to safeguard their health and safety while on duty.

The responsibility for implementing and monitoring health and safety policies is shared collectively by management, individual departments, and relevant committees. This coordinated approach reflects the Company's ongoing commitment to maintaining a secure, inclusive, and supportive work environment, one that prioritises employee well-being and promotes both personal and professional development.

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

Topic	FY 2024-25			FY 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		Nil			Nil	
Health & Safety						

14. Assessments for the year

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

Note: The percentage is provided basis the assessment against the compliances requirements.

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

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

**LEADERSHIP INDICATORS**

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

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

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

The Company extends life insurance coverage to all its employees, offering financial support to their immediate family members in the unfortunate event of death. Under this benefit, the designated nominee receives a payout equivalent to three times the employee's annual Cost to Company (CTC), providing a meaningful safeguard for dependents during times of distress. Additionally, compensatory provisions are extended to workers as part of the Company's commitment to supporting the well-being of its workforce. These measures underscore Hathway's dedication to creating a secure and responsible workplace that values the welfare of its employees and their families.

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

The Company places utmost importance on regulatory compliance and undertakes several measures to ensure that all statutory dues are appropriately deducted and deposited by its value chain partners. Before engaging with any vendor or business partner, the Company requires verification and validation of payment challans as part of its due diligence process.

A comprehensive compliance assessment is carried out, which includes a thorough review of relevant licences, registrations, and statutory filings. Particular attention is paid to obligations under the Provident Fund (PF) and Employee State Insurance Corporation (ESIC), along with verification that applicable taxes have been deducted and deposited with the appropriate government authorities.

Documented proof of compliance is mandated from value chain partners prior to the release of any payments. This robust process not only ensures adherence to legal requirements but also reinforces the Company's commitment to ethical business practices and fosters confidence among stakeholders, including government bodies, employees, and business associates.



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

Category	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25	FY 2023-24	FY 2024-25	FY 2023-24
Employees			Nil	
Workers			Nil	

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

While the Company does not currently have a formal transition assistance policy, it extends meaningful support to retiring employees to ensure a smooth transition from active service. Retired employees are guided in availing of their entitled retirement benefits, including Provident Fund (PF) and Gratuity. In addition, the Company offers the option of continuing under the Group Medical Coverage policy, thereby extending healthcare support beyond employment. Through these measures, the Company demonstrates a compassionate and respectful approach, acknowledging the valuable contributions of its workforce and fostering a culture of appreciation and care that extends beyond their tenure.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100%
Working Conditions	100%

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

No significant risks or concerns were identified during the assessment of health and safety practices and working conditions of value chain partners. Accordingly, no corrective actions were deemed necessary during the reporting period.

Hathway remains focused on upholding high standards of health and safety across its operations and among its partners. The Company ensures that all requisite Personal Protective Equipment (PPE) is provided where necessary and maintains robust preparedness to deliver First Aid support to both workers and employees. This proactive approach underlines the Company's ongoing commitment to safe working environments and responsible business conduct throughout its value chain.

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



Hathway recognises its responsibility to respect and safeguard the interests of all stakeholders, with sensitivity towards the needs of vulnerable and marginalised groups. The Company strives to ensure that its operations, products, services, and decisions create a meaningful and positive impact across its stakeholder base. Through inclusive practices and stakeholder engagement mechanisms, Hathway seeks to understand diverse perspectives and respond to evolving expectations.

### ESSENTIAL INDICATORS

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

The Company adopts a holistic and inclusive approach to identify and engage with its stakeholder ecosystem. This includes individuals and entities with whom Hathway has direct relationships, as well as those whose actions and interests may indirectly influence the Company's operations, reputation, or long-term performance. Hathway has categorised its stakeholders into internal and external groups, based on the degree of interaction and the potential impact they have on the business. Internal stakeholders primarily comprise the Company's employees who play a crucial role in operational execution and cultural alignment. External stakeholders include shareholders and investors, customers, suppliers, contractors, regulators, media, and the community at large.

The identification of stakeholders is guided by their relevance to the business, their influence on decision-making processes, and their ability to impact or be impacted by the Company's strategic objectives. These groups are considered essential partners in the value creation process providing capital, co-developing and delivering services, ensuring regulatory compliance, enhancing brand perception, and contributing to community development. By cultivating a nuanced understanding of its stakeholders' expectations, Hathway reinforces its commitment to transparent, responsible, and mutually respectful engagement. This approach supports informed decision-making and contributes meaningfully to the Company's sustainable growth and long-term resilience.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication	Frequency of engagement (Annually/ Half yearly/ Quarterly /others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	E-mails, regular meetings, annual programmes, cultural events, training sessions, notice board, Leadership meets.	Ongoing Annually As needed	The Company fosters a collaborative and inclusive workplace environment, encouraging open communication. Engagement focuses on policy updates, strategic direction, performance feedback, and sustainability initiatives.
Investor and Shareholders	No	Meetings, Conferences, Website, Reports	Quarterly/Annually	The Company emphasises transparency and accountability. Engagement aims to align on performance, expectations, governance practices, and long-term strategic direction.
Suppliers	No	Supplier audits	Event Based	Engagement ensures alignment with the Company's standards on health, safety, ethical business practices, and service delivery. Discussions focus on compliance, operational risks, and continuity planning.
Customers	No	Customer Care, social media, website, applications	Event Based	Engagement is focused on understanding customer needs, resolving grievances, and enhancing service delivery. It helps in building long-term trust and loyalty.

Community	Yes	Corporate Social Responsibility (CSR) Activities	Ongoing	The Company supports inclusive community development through CSR. Engagement helps understand community needs and implement programmes that promote shared growth and wellbeing.
Regulators	No	Consultation Papers, Submission of Compliances	Event Based	Engagement ensures adherence to applicable laws and timely submission of regulatory filings, helping mitigate legal and operational risks.

**LEADERSHIP INDICATORS**

- 1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.**

Consultation with stakeholders forms a foundational element of the Company’s strategic and operational decision-making processes, particularly in relation to economic, environmental, and social topics. The Company engages with stakeholders through a variety of channels such as virtual platforms, in-person meetings, and social media. These engagements occur at predetermined intervals or on a need basis, ensuring continuous value creation for stakeholders while striving to minimise environmental impact.

To manage these interactions effectively, designated heads of departments oversee engagement with relevant stakeholder groups. For instance, employee feedback on material issues (as outlined in Section A – Q26) is initially assessed by departmental heads. These recommendations are then escalated to the Chief Human Resources Officer (CHRO), who is authorised by the Board to make decisions on a wide range of organisational matters.

The CHRO acts as a direct link between stakeholder feedback and the Board. Where required, the CHRO consults with the Board on key business objectives and strategic matters. This structured process ensures that stakeholder concerns and suggestions are duly considered at the highest level, thereby reinforcing the Company’s commitment to transparent and responsive governance.

- 2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.**

Yes, stakeholder consultation is actively used to support the identification and management of environmental and social topics. Stakeholder engagement plays a critical role in helping the Company identify material concerns and shape relevant policies and initiatives to address them. Feedback gathered through these engagements is used to enhance operational efficiency, promote inclusivity, and advance the Company’s broader sustainability objectives.

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

The Company embeds Corporate Social Responsibility (CSR) principles within its core business objectives, acknowledging its role in addressing the needs of vulnerable and marginalised stakeholder groups. In alignment with applicable statutory requirements, a dedicated CSR Committee has been constituted to steer and oversee all CSR initiatives.

This Committee identifies relevant focus areas through structured internal consultations and collaborations with external partners to understand the evolving needs of disadvantaged communities. Based on these engagements, the Company prioritised a Sustainable Livelihood Programme during the reporting year, aimed at empowering individuals from marginalised backgrounds by enhancing their income-generating capacities and improving their long-term socio-economic resilience.

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



The Company is committed to upholding human rights and ensuring a workplace that is free from harassment, discrimination, and bias. It has established robust policies and grievance redressal systems that enable employees to voice concerns in a safe and respectful environment. Regular training sessions and awareness programmes are conducted to sensitise all stakeholders on issues related to dignity, well-being, and human rights. These initiatives are guided by both national and international frameworks, reinforcing the Company's pledge to create an inclusive, respectful, and ethically responsible workplace.

### 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 2024-25			FY 2023-24		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
<b>Employees</b>						
Permanent	241	241	100%	258	258	100%
Other than permanent	113	0	0%	134	0	0%
<b>Total Employees</b>	<b>354</b>	<b>241</b>	<b>68.08%</b>	<b>392</b>	<b>258</b>	<b>65.82%</b>
<b>Workers</b>						
Permanent	62	62	100%	67	67	100%
Other than permanent	3,455	0	0%	3,554	0	0%
<b>Total Workers</b>	<b>3,517</b>	<b>62</b>	<b>1.76%</b>	<b>3,621</b>	<b>67</b>	<b>1.85%</b>

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

Category	FY 2024-25					FY 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)
<b>Employees</b>										
<b>Permanent</b>										
Male	230	0	0%	230	100%	248	0	0%	248	100%
Female	11	0	0%	11	100%	10	0	0%	10	100%
<b>Total</b>	<b>241</b>	<b>0</b>	<b>0%</b>	<b>241</b>	<b>100%</b>	<b>258</b>	<b>0</b>	<b>0%</b>	<b>258</b>	<b>100%</b>
<b>Other than Permanent</b>										
Male	107	0	0%	107	100%	128	0	0%	128	100%
Female	6	0	0%	6	100%	6	0	0%	6	100%
<b>Total</b>	<b>113</b>	<b>0</b>	<b>0%</b>	<b>113</b>	<b>100%</b>	<b>134</b>	<b>0</b>	<b>0%</b>	<b>134</b>	<b>100%</b>

Category	FY 2024-25					FY 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)
<b>Workers</b>										
<b>Permanent</b>										
<b>Male</b>	58	6	10%	52	90%	61	8	13%	53	87%
<b>Female</b>	4	0	0%	4	100%	6	0	0%	6	100%
<b>Total</b>	<b>62</b>	<b>6</b>	<b>10%</b>	<b>56</b>	<b>90%</b>	<b>67</b>	<b>8</b>	<b>12%</b>	<b>59</b>	<b>88%</b>
<b>Other than Permanent</b>										
<b>Male</b>	3,279	107	3%	3,172	97%	3,358	99	3%	3,259	97%
<b>Female</b>	176	4	2%	172	98%	196	1	1%	195	99%
<b>Total</b>	<b>3,455</b>	<b>111</b>	<b>3%</b>	<b>3,344</b>	<b>97%</b>	<b>3,554</b>	<b>100</b>	<b>3%</b>	<b>3,454</b>	<b>97%</b>

### 3. Details of remuneration/salary/wages:

#### a. Median remuneration / wages

	Male		Female	
	Number	Median remuneration/salary/wages of respective category	Number	Median remuneration/salary/wages of respective category
Board of Directors (BoD)	4	-	2	-
Key Managerial Personnel (KMP)	3	1,77,48,600	0	NA
Employees other than BoD and KMP	334	7,92,180	17	5,25,636
Workers	3,337	2,85,600	180	2,55,639

#### b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

	FY 2024-25	FY 2023-24
Gross wages paid to females as % of total wages	4.26%	4.43%

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

Yes, the Company has a designated mechanism in place to address human rights impacts or issues arising from its operations. This responsibility is assigned to the Regional Human Resource Department, which serves as the first point of contact for employees to raise concerns and seek resolution at the regional level. In cases where an employee is not satisfied with the outcome, the matter can be escalated to the Head of Human Resources for further review. Additionally, employees have the option to approach the Chairman of the Audit Committee for any unresolved grievances related to human rights or other serious concerns. This dual-level mechanism provides employees with multiple channels to report issues, thereby reinforcing the Company's accountability and commitment to respecting and addressing human rights across its operations.

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

The Company has established a structured framework to uphold human rights and ensure effective redressal of related grievances. A formal policy is in place that promotes non-discrimination and equal opportunities for all, irrespective of race, colour, gender, religion, political opinion, nationality, or social origin. Employment opportunities and career advancement are based solely on merit and performance.

To strengthen the protection of human rights across its operations, the Company has adopted the following internal mechanisms:

- **Due Diligence:** Comprehensive human rights due diligence processes are conducted to identify, prevent, and mitigate any actual or potential adverse impacts arising from business activities.
- **Zero Tolerance:** The Company enforces a strict prohibition against human rights violations by employees, contractors, or third-party affiliates.

- **Grievance Redressal:** Accessible and confidential grievance mechanisms are in place to enable affected individuals to raise concerns. These mechanisms are integrated into the broader management systems to ensure timely and fair resolution.
- **Child and Forced Labour:** The Company explicitly prohibits the use of child or forced labour within its operations and throughout its value chain.
- **Awareness and Training:** Regular training sessions are conducted to build awareness and promote respect for human rights among employees, suppliers, and other stakeholders.
- **Freedom of Association:** The Company respects the rights of employees to freedom of association and collective bargaining. It maintains an open and cooperative approach towards trade unions and ensures protection against any form of retaliation for exercising these rights.

Through continuous review and the integration of best practices, the Company is committed to strengthening its approach towards the protection and promotion of human rights.

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

	FY 2024-25			FY 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	No Complaints were registered	0	0	No Complaints were registered
Discrimination at workplace	0	0		0	0	
Child Labour	0	0		0	0	
Forced Labour / Involuntary Labour	0	0		0	0	
Wages	0	0		0	0	
Other human rights related issues	0	0		0	0	

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

	FY 2024-25	FY 2023-24
Total Complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

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

The Company has established clear procedures and policies to prevent any adverse consequences to complainants in cases of discrimination or harassment. Employees can report such concerns through designated channels, including their Reporting Authority, Head of Department, or the Local HR Administrator.

Once a complaint is received, the appropriate internal committee formed in accordance with applicable legal provisions, reviews reviews and addresses the issue in a prompt and confidential manner. To safeguard the well-being of the complainant, precautionary measures such as temporary relocation to another office and a provision of up to 15 days' leave may be offered, depending on the circumstances.

The Company maintains a strict no-retaliation policy, and any action taken against a complainant for reporting an issue is treated as a serious breach of conduct. This approach ensures that employees can raise concerns without hesitation and that all complaints are addressed fairly and in line with legal and ethical standards.

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

Yes, the Company incorporates human rights requirements into its business agreements and contracts. These agreements are designed to align with the Company's Code of Conduct and are drafted in clear and accessible language to ensure all parties understand their responsibilities. All signatory parties are required to comply with applicable laws and regulations, including

but not limited to the Labour Laws, Minimum Wage provisions, statutory safeguards against Child Labour, and legislations that prohibit Harassment and Discrimination. Contracts also reference relevant state and national guidelines related to human rights. By embedding these clauses into contractual agreements, the Company promotes compliance, accountability, and ethical practices across its value chain. This approach helps reinforce responsible conduct and legal adherence in all business dealings.

**10. Assessment for the year:**

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
Child labour	100% of Hathway offices (i.e., 36 offices) were assessed during the reporting year for compliance with applicable laws and internal policies concerning child labour, forced or involuntary labour, sexual harassment, workplace discrimination, and wage-related practices.
Forced/involuntary labor	
Sexual harassment	The Company conducts periodic internal audits to ensure alignment with statutory requirements and internal codes. These assessments are carried out with the support of Regional Human Resource representatives and relevant functional committees. The Prevention of Sexual Harassment (POSH) Committee oversees the implementation of measures to maintain a safe and respectful work environment, while additional internal committees are tasked with ensuring adherence to the Company's Code of Conduct.
Discrimination at workplace	
Wages	
Others – please specify	Through these mechanisms, Hathway ensures that all offices operate in compliance with legal obligations and ethical standards concerning employee rights and welfare.

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

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

**LEADERSHIP INDICATORS**

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

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

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

The Company has not undertaken a formal human rights due diligence exercise during the reporting period. However, it maintains oversight of human rights matters through adherence to its Code of Conduct, which outlines expected standards of behaviour and compliance with applicable laws and regulations.

Employees are made aware of these expectations through regular communications and are encouraged to report any instances of discrimination, misconduct, or potential human rights violations to their department heads or designated internal authorities. These reports are reviewed and acted upon in accordance with internal grievance redressal mechanisms, ensuring that concerns are addressed in a structured and accountable manner.

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

The Company ensures that its premises are accessible to differently abled visitors in line with the requirements of the Rights of Persons with Disabilities Act, 2016. Measures in place include wheelchair-accessible entryways, operational lifts, and other necessary infrastructure to facilitate ease of movement and access. These provisions are part of the Company's broader effort to create an inclusive environment that respects the needs of all individuals.

4. **Details on assessment of value chain partners:**

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Sexual Harassment	The Company uses a third-party agency to audit 100% of its vendors on a quarterly basis for compliance across these aspects.
Discrimination at workplace	We are committed to embedding ethical and sustainable practices throughout our value chain. All partners are expected to comply with our Code of Conduct, which sets clear and transparent guidelines to uphold responsible business practices. Hathway maintains a zero-tolerance policy towards any breach involving harassment, unethical labour practices, or violations of human rights. In the event of non-compliance, the Company reserves the right to terminate the contract. We continuously review and strengthen our practices to uphold the highest standards of integrity and sustainability across our operations.
Child Labour	
Forced Labour/ Involuntary Labour	
Wages	
Others – please specify	

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

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



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


The Company recognises that sustainable development requires balancing present demands with the preservation of environmental resources for future generations. It actively integrates environmental considerations into its operational and strategic decision-making, seeking to reduce negative impacts while enhancing resource efficiency. The Company's approach involves engaging both internal and external stakeholders to collaboratively identify and implement practical solutions. Through this inclusive process, the Company aims to contribute meaningfully to long-term societal well-being and environmental protection. Its efforts are guided by compliance with relevant environmental laws and the adoption of best practices in areas such as energy efficiency, waste management, water conservation, and pollution control.

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

Parameter	FY 2024-25	FY 2023-24*
<b>From renewable sources</b>		
Total electricity consumption (A) (GJ)	Nil	Nil
Total fuel consumption (B) (GJ)	Nil	Nil
Energy consumption through other sources (C) (GJ)	Nil	Nil
<b>Total energy consumption (A+B+C) (GJ)</b>	Nil	Nil
<b>From non-renewable sources</b>		
Total electricity consumption (D) (GJ)	55,858.31	54,093.70
Total fuel consumption (E) (GJ)	4,713.62	4,613.37
Energy consumption through other sources (F) (GJ)	-	-
<b>Total energy consumption from non-renewable sources (D+E+F) (GJ)</b>	60,571.93	58,707.07
<b>Total energy consumed (A+B+C+D+E+F) (GJ)</b>	60,571.93	58,707.07
<b>Energy intensity per rupee of turnover</b> (Total energy consumption/turnover in rupees) (GJ per million ₹)	10.06	9.43
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed / Revenue from operations adjusted for PPP) (GJ per million USD)	207.83	215.72
<b>Energy intensity in terms of physical output</b>	-	-
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

*\*Note: The scope of reporting has been expanded to all of our operational units including, but not limited to, our offices and warehouses. Thus, there is a restatement of information for the previous year.*

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

No

**2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.**

Not Applicable

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

Parameter	FY 2024-25	FY 2023-24
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	Nil	Nil
(ii) Groundwater	Nil	Nil
(iii) Third party water	50,948.91	54,536.67
(iv) Seawater / desalinated water	Nil	Nil
(v) Others (Rainwater storage)	Nil	Nil
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	50,948.91	54,536.67
<b>Total volume of water consumption (in kilolitres)</b>	50,948.91	54,536.67
<b>Water intensity per rupee of turnover</b> (Water consumed / turnover) (kl per million ₹ of revenue)	8.46	8.76
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption / Revenue from operations adjusted for PPP) (KL per million USD)	174.82	200.39
<b>Water intensity in terms of physical output</b>	-	-
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity	-	-

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

No

4. Provide the following details related to water discharge:

Parameter	FY 2024-25	FY 2023-24
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water		
- No treatment		
- With treatment – please specify level of Treatment		
(ii) To Groundwater		
- No treatment		
- With treatment – please specify level of Treatment		
(iii) To Seawater		
- No treatment		
- With treatment – please specify level of Treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment – please specify level of Treatment		
(v) Others		
- No treatment		
- With treatment – please specify level of Treatment		
<b>Total water discharged (in kilolitres)</b>		

The Company uses water for drinking and sanitary purposes only.

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

No

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

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

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

Parameter	Please specify unit	FY 2024-25	FY 2023-24
NOx			
SOx			
Particulate matter (PM)			
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous Air Pollutants (HAP)			
Others – please specify			

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

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

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

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

Parameter	Unit	FY 2024-25	FY 2023-24*
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	1,100.83	1,396.19
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub> e	11,280.28	10,758.64
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	tCO <sub>2</sub> e/million ₹	2.06	1.95
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	tCO <sub>2</sub> e/million USD	42.48	44.66
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	-	-	-
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity	-	-	-

**\*Note:** We have expanded the scope of our reporting to all our operational units including, but not limited to, our offices and warehouses. Thus, there is a restatement of information for the previous year.

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

No

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

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

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

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

Parameter	FY 2024-25	FY 2023-24
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	Nil	Nil
E-waste (B)	53.66	48.62
Bio-medical waste (C)	NA	NA
Construction and demolition waste (D)	Nil	Nil
Battery waste (E)	41.30	24.58
Radioactive waste (F)	NA	NA
Other Hazardous waste. Please specify, if any. (G)	Nil	Nil
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)	Nil	Nil
<b>Total (A + B + C + D + E + F + G + H)</b>	<b>94.96</b>	<b>73.20</b>
<b>Waste intensity per rupee of turnover</b> (Total waste generated / Revenue from operations) (MT/million ₹)	0.016	0.011
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated / Revenue from operations adjusted for PPP) (MT/million USD)	0.33	0.27
<b>Waste intensity in terms of physical output</b>	-	-
<b>Waste intensity (optional) – the relevant metric may be selected by the entity</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 (E-Waste)</b>		
(i) Recycled	94.96	73.20
(ii) Re-used	0	0
(iii) Other recovery operations	Nil	Nil
<b>Total</b>	<b>94.96</b>	<b>73.20</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste (E-Waste)</b>		
(i) Incineration	Nil	Nil
(ii) Landfilling	Nil	Nil
(iii) Other disposal operations	Nil	Nil
<b>Total</b>	<b>Nil</b>	<b>Nil</b>

**Note:** We are not accounting for the Single Band ONU/ Modems/Duals that were reclaimed, refurbished and reused as for our process we do not consider these units as waste. Please note that E-waste considered consists of Single Band ONU/ Modems/Duals collected from customer and sent for recycling through authorised disposal partner.

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

No

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

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

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

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.
No offices are present in ecologically sensitive areas.			

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

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

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

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

**LEADERSHIP INDICATORS**

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

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

None of our operations are in water stressed areas.

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

Parameter	FY 2024-25	FY 2023-24
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water		
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		Not Applicable
<b>Total volume of water withdrawal (in kilolitres)</b>		
<b>Total volume of water consumption (in kilolitres)</b>		
<b>Water intensity per rupee of turnover</b> (Water consumed / turnover)		
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity		
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		

Parameter	FY 2024-25	FY 2023-24
(i) Into Surface water		
- No treatment		
- With treatment – please specify level of Treatment		
(ii) Into Groundwater		
- No treatment		
- With treatment – please specify level of Treatment		
(iii) Into Seawater		
- No treatment		
- With treatment – please specify level of Treatment		Not Applicable
(iv) Sent to third-parties		
- No treatment		
- With treatment – please specify level of Treatment		
(v) Others		
- No treatment		
- With treatment – please specify level of Treatment		
<b>Total water discharged (in kilolitres)</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.**

No

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

Parameter	Unit	FY 2024-25	FY 2023-24
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)			
<b>Total Scope 3 emissions per rupee of turnover</b>			
<b>Total Scope 3 emission intensity</b> (optional) – the relevant metric may be selected by the entity			

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

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

No

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

Not Applicable.

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

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
		No such initiatives are taken in FY 2024-25.	

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

The Company has established a robust Business Continuity and Disaster Management Plan to ensure minimal disruption and quick restoration of operations during unforeseen events. A dedicated committee comprising representatives from the IT, Technical Team, and Senior Management oversees planning, implementation, and review of the framework. This includes identifying critical functions, ensuring data backup, and maintaining essential infrastructure. The plan is regularly tested and updated to address evolving risks and external challenges. By taking a proactive and structured approach, the Company ensures operational resilience and continuity across key business functions during both natural and man-made disruptions.

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

Nil

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

Nil

**8. How many Green Credits have been generated or procured:**

**a. By the listed entity**

Nil

**b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners**

The information is unavailable since value chain assessment has not been carried out.

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



The Company upholds ethical conduct and transparency in all public and regulatory interactions. It ensures timely, accurate communication with authorities and adheres to the principles of accountability, fairness, and stakeholder balance. Only authorised and trained personnel represent the Company in engagements with trade bodies and industry associations involved in policymaking. These engagements are guided by the Company’s sustainability goals and corporate citizenship values. Through constructive dialogue and informed participation, the Company aims to contribute to the formulation of policies that support inclusive growth, regulatory compliance, and responsible business conduct.

**ESSENTIAL INDICATORS**

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

2

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

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

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

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

**LEADERSHIP INDICATORS**

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

Sr. No.	Public policy advocated	Method resort for such advocacy	Whether the information is available in public domain? (Yes/No)	Frequency of review by board (Annually/ Half yearly/ Quarterly/ Other-please specify)	Web Link, if available
1.	Consultation Paper on The Terms and Conditions of Network Authorisations to be Granted Under the Telecommunications Act, 2023	Through Internet Service Providers of India by Giving opinion comment, views on the consultation papers	Yes	Annually	<a href="https://traigov.in/sites/default/files/2024-11/ISPAI_20112024.pdf">https://traigov.in/sites/default/files/2024-11/ISPAI_20112024.pdf</a>
2.	Consultation Paper on Terms and Conditions for the Assignment of Spectrum for Certain Satellite-Based Commercial Communication Services		Yes	Annually	<a href="https://traigov.in/sites/default/files/2024-11/ISPAI_26102024.pdf">https://traigov.in/sites/default/files/2024-11/ISPAI_26102024.pdf</a>
3.	Consultation Paper on the Framework for Service Authorisations to be Granted Under the Telecommunications Act, 2023		No	Annually	-
4.	Consultation Paper on Auction of Frequency Spectrum in 37-37.5 GHz, 37.5-40 GHz, and 42.5-43.5 GHz bands Identified for IMT		Yes	Annually	<a href="https://traigov.in/sites/default/files/2024-11/ISPAI_27052024.pdf">https://traigov.in/sites/default/files/2024-11/ISPAI_27052024.pdf</a>



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



The Company is committed to supporting equitable and sustainable community development, with a strong emphasis on inclusion. It integrates inclusive values and Corporate Social Responsibility (CSR) priorities into its broader business objectives. Guided by the principle of shared progress, the Company works towards creating a society that benefits all sections, particularly the underserved. Its CSR initiatives focus on areas such as accessible healthcare, environmental sustainability, and social awareness, aiming to improve the quality of life and promote long-term development within the communities it serves.

**ESSENTIAL INDICATORS**

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

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

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

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

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

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

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

	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/ Small producers	57.13%	62%
Directly from within India	100%	96%

5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost.

Location	FY 2024-25	FY 2023-24
Rural	0.16%	0.04%
Semi urban	0.16%	0.01%
Urban	11.72%	14.95%
Metropolitan	87.96%	85.00%

(Place are categorised as per RBI Classification System – rural / semi-urban / urban / metropolitan)

**LEADERSHIP INDICATORS**

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

Details of negative social impact identified	Corrective action taken
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Not Applicable

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

identified by government bodies:

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

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)  
 No. The Company does not have a preferential procurement policy that gives importance to purchasing from suppliers who belong to marginalised or vulnerable groups.
- (b) From which marginalized /vulnerable groups do you procure?  
 Not Applicable
- (c) What percentage of total procurement (by value) does it constitute?  
 Not Applicable

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

Sr. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating of benefits shared
Not Applicable				

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

Name of authority	Brief of case	Corrective action taken
Not Applicable		

6. Details of beneficiaries of CSR Projects.

S. No	CSR Project	No. of persons benefited from CSR Projects	% of beneficiaries from vulnerable and marginalized group
1	Sustainable Livelihoods Programme	58,824	100%

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



The increasing penetration of the internet and rapid advancements in technology have reshaped the way individuals connect, communicate, and access services. The Company recognises this shift and prioritises ethical, responsible, and regulation-compliant engagement with its customers. It leverages advanced digital solutions to deliver innovative, user-friendly services at competitive prices. By consistently refining its systems and processes, Hathway seeks to enhance customer experience, respond effectively to changing expectations, and ensure that its services remain accessible, relevant, and reliable.

**ESSENTIAL INDICATORS**

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

The Company has implemented a structured two-tier grievance redressal system in accordance with the Telecom Consumer Complaint Redressal Regulations, 2012, issued by the Telecom Regulatory Authority of India (TRAI), and any subsequent amendments thereto.

Consumers may register complaints or share feedback through multiple accessible channels, including:

- AI Chatbot (Diva)
- 24x7 Toll-Free Customer Care Number
- Customer Care Email
- Mobile Application
- WhatsApp
- Self-Care (Web Portal)
- Written Submissions

To enhance efficiency, the Company has introduced Diva, an AI-driven chatbot that assists users in addressing queries, lodging complaints, and connecting with service representatives.

Upon receipt of a complaint, the following actions are undertaken:

- A unique docket/complaint reference number is generated and sent via SMS to the customer’s registered mobile number.
- Complaints are resolved within the timeframes stipulated under TRAI’s Quality-of-Service regulations.
- On resolution, the Company shares a closure update with the customer via SMS, outlining the action taken.

In cases where the consumer is dissatisfied with the resolution or does not receive a timely update, they may escalate the matter to the Appellate Authority in accordance with the prescribed process.

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

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

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

Category	FY 2024-25			FY 2023-24		
	Received during the year	Pending resolution at the end of year	Remarks	Received during the year	Pending resolution at the end of year	Remarks
Data privacy	0	0		0	0	
Advertising	0	0	No Remark	0	0	No Remark
Cyber-security	0	0		0	0	

Delivery of essential services	Customer complaints are resolved as per applicable legislations, including sector specific legislation.		Customer complaints are resolved as per applicable legislations, including sector specific legislation.	
Restrictive Trade Practices	0	0	0	0
Unfair Trade Practices	0	0	No Remark	No Remark
Others	0	0	0	0

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

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

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

Yes. The Company has implemented a structured Information Security Policy designed to uphold the confidentiality, integrity, and availability of its information assets. This policy aligns with applicable legal and regulatory requirements and sets out minimum standards for managing cyber security and data privacy risks across operations.

To ensure effective execution, the Company has constituted a dedicated Information Security Committee responsible for:

- Developing and overseeing the implementation of the cyber security framework.
- Promoting awareness and adoption of best practices on data privacy.
- Monitoring compliance by both internal teams and third-party partners handling sensitive data.

The framework is designed to proactively address vulnerabilities, mitigate data privacy risks, and instill a culture of responsibility regarding digital security among all stakeholders.

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

The Company has implemented a robust framework to address potential breaches, vulnerabilities, and concerns related to our cyber security infrastructure and the privacy of customer data. Our remedial and preventative actions include:

1. **Regular VAPT:** Vulnerability Assessment and Penetration Testing (VAPT) is conducted every six months on all applications, network devices, and servers.
2. **Active Vulnerability Management:** We schedule constant follow-ups and discussions to track open vulnerabilities, ensuring all Critical and High severity findings are closed within defined timelines.
3. **Data Encryption:** To protect sensitive information, all customer data is encrypted, both at rest and in transit.

There were no instances of product recalls, penalties, or regulatory actions related to advertising, delivery of essential services, or safety of products/services reported during the reporting period.

7. **Provide the following information relating to data breaches:**

- a. **Number of instances of data breaches**  
No such incidents were recorded.
- b. **Percentage of data breaches involving personally identifiable information of customer**  
Not Applicable
- c. **Impact, if any, of the data breaches**  
Not Applicable

## LEADERSHIP INDICATORS

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

The Company has established multiple user-friendly platforms to ensure easy access to information about its products and services. These include:

- **Website:** [www.hathway.com](http://www.hathway.com) – Provides comprehensive details on plans, services, and support.
- **Mobile Application:** Hathway Broadband App is available for download on Android and iOS platforms, enabling customers to manage their accounts, raise service requests, and access usage details.
- **Customer Care Centre:** Toll-Free Number – 18004193114 available 24x7 for assistance and queries.
- **Consumer Charter:** [Consumer Charter](#) – Outlines consumer rights, service standards, and grievance redressal processes.

These channels are designed to ensure that customers can access accurate, updated, and transparent information conveniently.

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

The Company is committed to promoting safe and responsible usage of its services while ensuring that consumers are well-informed and empowered. In line with this, the following initiatives have been undertaken:

1. **Proactive Communication:** The Company sends regular SMS and app-based notifications to advise customers on both physical and cyber safety measures. These include preventive steps like disconnecting Hathway devices during heavy lightning and rains to avoid equipment damage, as well as cyber security advisories such as safeguarding personal information, using strong passwords, and being alert to phishing attempts.
2. **Consumer Awareness through Charter:** In accordance with Clause 17 of the Telecom Consumer Complaint Redressal Regulation, 2012 issued by TRAI, the Company has published the Telecom Consumer Charter on its website. This Charter outlines customer rights and obligations, quality of service standards, and available grievance redressal mechanisms. It serves as a guiding document for customers to understand the responsible use of telecom services.

These efforts are intended to support informed decision-making, enhance customer experience, and promote a culture of safety and responsibility among consumers.

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

The Company has established a multi-channel communication framework to ensure timely dissemination of information to consumers in case of any potential disruption or discontinuation of essential services. The mechanisms include:

1. **Mobile App Notifications:** Customers receive real-time alerts through the Hathway Broadband App regarding planned or unplanned service disruptions in their area.
2. **SMS Alerts:** Mass notifications are sent via SMS to registered mobile numbers, providing updates on outages or service interruptions.
3. **Call Centre IVR Messages:** Pre-recorded automated voice messages are integrated into the Call Centre IVR system to inform customers of disruptions specific to their location.

These systems are designed to ensure transparency, minimise inconvenience, and uphold customer trust during any service disruptions.

4. **Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable)? If yes, provide details in brief.**

Not applicable

**Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

Yes, the Company conducts customer satisfaction surveys following the resolution of each complaint. These surveys are shared with registered users via email and SMS to gather insights on service experience. The feedback received is systematically analysed and shared with the respective Customer Service teams across all operational locations to initiate corrective or preventive actions, wherever required. This process supports continuous improvement in service delivery and reinforces the Company's commitment to consumer-centricity.