# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

## HATHWAY CABLE AND DATACOM LIMITED

### Financial Year 2025-26

# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (BRSR)

## SECTION A: GENERAL DISCLOSURES

### I. Details of the Listed Entity

| | | |
|---|---|---|
| 1. | **Corporate Identity Number (CIN) of the Listed Entity** | L64204MH1959PLC011421 |
| 2. | **Name of the Listed Entity** | Hathway Cable and Datacom Limited (“Company” or “Hathway”) |
| 3. | **Year of incorporation** | 1959 |
| 4. | **Registered office address** | 8th Floor, Interface-11, Link Road, Malad West, Mumbai, Maharashtra – 400064 |
| 5. | **Corporate address** | 8th Floor, Interface-11, Link Road, Malad West, Mumbai, Maharashtra – 400064 |
| 6. | **E-mail** | info@hathway.net |
| 7. | **Telephone** | 022 40542500 |
| 8. | **Website** | www.hathway.com |
| 9. | **Financial year for which reporting is being done** | 1st April 2025 to 31st March 2026 |
| 10. | **Name of the Stock Exchange(s) where shares are listed** | - National Stock Exchange of India Limited (NSE)<br>- BSE Limited (BSE) |
| 11. | **Paid-up Capital** | ₹ 354.02 crores |
| 12. | **Contact Person** | |
| | **Name of the Person** | Mr. Ajay Singh |
| | **Telephone** | 022 40542500 |
| | **Email** | ajay.singh@hathway.net |
| 13 | **Reporting boundary -**<br>**Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).** | All the data reported in this report pertains to Hathway Standalone entity. |
| 14. | **Name of assurance provider** | - |
| 15. | **Type of assurance obtained** | - |

### II. Product/ Services

| | | S. No. | Description of Main Activity | Description of Business Activity | % Turnover of the Entity |
|---|---|---|---|---|---|
| 16. | **Details of business activities** (accounting for 90% of the turnover): | 1 | Information and Communication | Wired, Wireless and Satellite Telecommunication activities | 100% |

| | | S. No. | Product/Service | NIC Code | % of total Turnover contributed |
|---|---|---|---|---|---|
| 17. | **Products/Services sold by the entity** (accounting for 90% of the entity’s Turnover): | 1 | Broadband Service | 61104 | 100% |

Note: As per the National Industrial Classification (NIC) 2025 guidelines issued by the Ministry of Statistics and Programme Implementation (MoSPI) on 07 November 2025, our updated NIC code is 611002.

## III. Operations

| 18. | Number of locations where plants and/ or operations/offices of the entity are situated: | Location | Number of Plants | Number of Offices | Total |
|---|---|---|---|---|---|
| | | National | - | 24 | 24 |
| | | International | - | - | - |

Note: The number of offices has been restated from 36 in the previous year to 24 in the current year, as technical offices included earlier have been excluded this year to align with BRSR reporting requirements.

| 19. | Market served by the entity | Locations | Number |
|---|---|---|---|
| | (a) No. of Locations | **National (No. of States)** | 13 (including 1 Union Territory) |
| | | **International (No. of Countries)** | - |
| | (b) What is the contribution of exports as a percentage of the total turnover of the entity? | | Nil |
| | (c) A brief on types of customers | 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:<br>1. **Residential Customers:** We provide high-speed Broadband services tailored to meet the needs of individual households, ensuring seamless connectivity for entertainment, education, and remote work.<br>2. **Non-Residential Customers:** Our Broadband services also extend to retail businesses, offering reliable internet solutions that support their operational needs.<br>3. **Internet Leased Line (ILL) Customers:** 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. | |

## IV. Employees

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

| S. No. | Particulars | Total (A) | Male | | Female | |
|---|---|---|---|---|---|---|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| **a.** | **Employees and workers (including differently abled)** | | | | | |
| | **Employees** | | | | | |
| 1 | Permanent (D) | 206 | 195 | 95% | 11 | 5% |
| 2 | Other than Permanent (E) | 125 | 119 | 95% | 6 | 5% |
| 3 | **Total employees (D+E)** | **331** | **314** | **95%** | **17** | **5%** |
| | **Workers** | | | | | |
| 4 | Permanent (F) | 54 | 51 | 94% | 3 | 6% |
| 5 | Other than Permanent (G) | 3101 | 2961 | 95% | 140 | 5% |
| 6 | **Total workers (F+G)** | **3155** | **3012** | **95%** | **143** | **5%** |
| **b.** | **Differently abled employees and workers** | | | | | |
| | **Differently abled Employees** | | | | | |
| 1 | Permanent (D) | 0 | 0 | 0 | 0 | 0 |
| 2 | Other than Permanent (E) | 0 | 0 | 0 | 0 | 0 |
| 3 | **Total differently abled employees (D+E)** | **0** | **0** | **0** | **0** | **0** |
| | **Differently abled Workers** | | | | | |
| 4 | Permanent (F) | 0 | 0 | 0 | 0 | 0 |
| 5 | Other than Permanent (G) | 0 | 0 | 0 | 0 | 0 |
| 6 | **Total differently abled workers (F+G)** | **0** | **0** | **0** | **0** | **0** |

**21. Participation/Inclusion/Representation of women**

| | Total (A) | No. and percentage of Females | |
|---|---|---|---|
| | | No. (B) | % (B/A) |
| Board of Directors | 6 | 2 | 33.33% |
| Key Management Personnel | 3 | 0 | 0% |

**22. Turnover rate for permanent employees and workers**

| | Current year (FY 2025-26) | | | Previous year (FY 2024-25) | | | Year prior to previous year (FY 2023-24) | | |
|---|---|---|---|---|---|---|---|---|---|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 17.41% | 18.18% | 17.45% | 18.41% | 28.57% | 18.84% | 24.30% | 10.50% | 21.20% |
| Permanent Workers | 12.84% | 28.57% | 13.79% | 8.40% | 40.00% | 10.85% | 8.20% | 0.00% | 6.50% |

Note: The turnover rate for FY 2024–25 has been restated to reflect an updated calculation methodology in alignment with BRSR requirements.

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

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

| S. No. | Name of the holding / subsidiary / associate companies / joint ventures (A) | Indicate whether Holding/ Subsidiary/ Associate/ 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 | Hathway Digital Limited | Subsidiary | 100% | No |
| 2 | Hathway Mantra Cable & Datacom Limited | Subsidiary | 100% | No |
| 3 | Hathway Sonali OM Crystal Cable Private Limited | Subsidiary | 68% | No |
| 4 | Hathway Bhawani Cabletel & Datacom Limited | Subsidiary | 51.60% | No |
| 5 | Hathway Bhawani NDS Network Limited@ | Subsidiary | 51.60% | No |
| 6 | Hathway Channel 5 Cable & Datacom Private Limited | Subsidiary | 51% | No |
| 7 | Hathway Latur MCN Cable & Datacom Private Limited | Subsidiary | 51% | No |
| 8 | Hathway MCN Private Limited | Subsidiary | 51% | No |
| 9 | Hathway SS Cable & Datacom LLP | Associate | 51% | No |
| 10 | GTPL Hathway Limited | Associate | 37.32% | No |
| 11 | Chennai Cable Vision Network Private Limited$ | Subsidiary | - | No |
| 12 | Hathway Ice Television Private Limited$ | Subsidiary | - | No |
| 13 | Hathway Nashik Cable Network Private Limited$ | Subsidiary | - | No |
| 14 | Hathway VCN Cablenet Private Limited* | Associate | - | No |
| 15 | Pan Cable Services Private Limited# | Associate | - | No |

**Note:**

@ Hathway Bhawani Cabletel & Datacom Limited, subsidiary of the Company has acquired remaining 49% stake in Hathway Bhawani NDS Network Limited, thereby making it Wholly Owned Subsidiary.

$ Ceased to be a subsidiary of the Company w.e.f. November 19, 2025, pursuant to sale of its entire shareholding by the Company.

* Ceased to be an associate of the Company w.e.f. November 19, 2025, pursuant to sale of its entire shareholding by the Company.

# Ceased to be an associate of the Company w.e.f. February 16, 2026, pursuant to approval of its application for voluntary strike off.

## VI. CSR Details

| | | |
|---|---|---|
| **24.** | i. Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) | Yes, CSR is applicable as per the section 135 of the Companies Act, 2013 to the Company. |
| | ii. Turnover (in ₹) | 5,81,98,27,323.06 |
| | iii. Net worth (in ₹) | 47,70,69,44,598.89 |

## 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 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|---|---|
| | | | 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 Remarks | Nil | Nil | No Remarks |
| Investors (other than shareholders) | Yes | ESG Policy & Vigil Mechanism and Whistle-blower Policy | Nil | Nil | No Remarks | Nil | Nil | No Remarks |
| Shareholders | Yes | | Nil | Nil | No Remarks | Nil | Nil | No Remarks |
| Employees and workers | Yes | | Nil | Nil | No Remarks | Nil | Nil | No Remarks |
| Customers* | Yes | Hathway Customer Service - Customer Support | 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 Remarks | Nil | Nil | No Remarks |

**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

| S. No. | 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) |
|---|---|---|---|---|---|
| 1 | Climate Change Action | Risk | Climate change presents growing risks to business operations, as extreme weather events can disrupt supply chains, raise operating expenses, and damage critical infrastructure. At the same time, regulatory requirements are becoming more stringent, making environmental compliance vital to prevent legal consequences and safeguard organizational reputation. | The Company proactively adopts sustainable practices and regularly evaluates the impact of climate change on its operations. By prioritizing transparency and active stakeholder engagement, we continue to enhance our ESG Policy to guide responsible decisionmaking. These focused initiatives are aimed at building longterm, sustainable value while addressing the challenges posed by a changing climate. | Negative |
| 2 | 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 |
| 3 | 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 |

| S. No. | 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) |
|---|---|---|---|---|---|
| 4 | 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 |
| 5 | 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 |
| 6 | 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 |

| S. No. | 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) |
|---|---|---|---|---|---|
| 7 | 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 |
| 8 | 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 |
| 9 | 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 |

| S. No. | 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) |
|---|---|---|---|---|---|
| 10 | 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 |
| 11 | 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 for board members on governance issues and estabwlish clear succession planning to ensure continuity and stability in leadership. | Positive |
| 12 | 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 |
| 13 | 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 |

| S. No. | 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) |
|---|---|---|---|---|---|
| 14 | 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 |
| 15 | 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 |
|---|---|---|---|---|---|---|---|---|---|---|
| **Policy and Management Processes** | | | | | | | | | | |
| **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** | Policies \|Hathway | | | | | | | | |
| **2.** | **Whether the entity has translated the policy into procedures. (Yes/No/NA)** | 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 put in place a comprehensive Code of Conduct for its business associates. These policies are extended to include partners, reinforcing sustainability across the entire value chain. This inclusive framework highlights the Company's commitment to responsible practices while fostering collaboration among stakeholders to create shared value and drive positive impact. | | | | | | | | |
| **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 deploys telecommunication equipment, including Optical Network Units (ONUs), that are certified by the Telecommunication Engineering Centre (TEC), a nationally recognized authority operating under the Department of Telecommunications, Government of India. This certification confirms compliance with prescribed standards for quality, safety, and performance within the telecommunications industry. By using TEC approved equipment, the Company ensures the delivery of reliable, secure, and efficient broadband and cable services, reflecting its focus on operational excellence and regulatory compliance. | | | | | | | | |
| **5.** | **Specific commitments, goals and targets set by the entity with defined timelines, if any.** | Demonstrating its commitment to responsible and sustainable business conduct, the Company proactively addresses environmental and social considerations through its operations. As part of its continuous improvement journey, the Company is in the process of defining ESG objectives and developing a structured roadmap to achieve its longterm sustainability goals. | | | | | | | | |
| **6.** | **Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.** | Once these ESG-specific targets are established, progress and performance against them will be transparently disclosed in the years ahead. | | | | | | | | |

**Governance, leadership and oversight**

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

As Hathway continues its Business Responsibility and Sustainability Reporting (BRSR) journey for FY2025-26, the Company remains steadfast in its commitment to integrating Environmental, Social, and Governance (ESG) principles into its strategy, operations, and decision-making processes. We view sustainability not as a parallel initiative, but as an intrinsic driver of long-term value creation and business resilience.

In an evolving operating environment marked by rapid technological change and rising stakeholder expectations, service-oriented organisations face distinct ESG-related challenges. Key among these is responsible energy consumption across dispersed operations, electronic waste management, data security and privacy, talent attraction and retention, and maintaining high standards of ethical governance. Addressing these challenges requires a structured, agile, and forward-looking approach.

During the year, the Company made steady progress in strengthening its ESG foundation. We advanced the integration of ESG considerations into governance structures, enhanced internal awareness, and reinforced policy frameworks governing ethical conduct, workplace practices, environmental stewardship, and stakeholder engagement. Efforts to improve resource efficiency, including energy conservation and responsible disposal and recycling of electronic waste, remain central to our environmental focus. On the social front, our emphasis continues to be on fostering a diverse, inclusive, and safe workplace, while ensuring fair labour practices and employee well-being.

| Disclosure Questions | | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|---|---|---|---|---|---|---|---|---|---|---|
| | Recognising the importance of measurable outcomes, the Company has taken significant steps toward defining its ESG priorities. While a structured ESG roadmap is currently under development, this foundational work marks an important milestone in our sustainability journey and will enable the setting of clear, time-bound targets going forward.<br><br>Governance continues to be a cornerstone of our ESG approach. Robust policies, transparent processes, and strong oversight mechanisms support ethical business conduct and risk management. As regulatory and stakeholder expectations evolve, we remain committed to reviewing and strengthening our governance practices to ensure accountability and transparency.<br><br>Looking ahead, Hathway is focused on transitioning from framework-building to performance-driven sustainability management. We are confident that a disciplined approach to ESG will enhance operational resilience, strengthen stakeholder trust, and support sustainable growth.<br><br>I extend my sincere appreciation to our employees, partners, customers, and shareholders for their continued support. Together, we remain committed to building a responsible, resilient, and future-ready organisation that creates meaningful value for all stakeholders. | | | | | | | | | |
| **8.** | **Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).** | The Board of Directors, along with the Business Responsibility Sustainability Committee (BRSC) (Board Committee), serves as the highest authority overseeing the implementation of the Company's Business Responsibility Policy. By entrusting this responsibility to the Board, Hathway ensures that the policy is guided and monitored at the highest level of leadership, supported by strategic oversight and direction.<br><br>This governance framework reflects the Company's strong commitment to embedding responsible business practices into its operational and decision-making processes. The Board and the BRSC play a key role in tracking progress, addressing emerging challenges, and ensuring that business activities remain aligned with the Company's sustainability objectives.<br><br>Additional information can be found in the Board's Report and the Corporate Governance section of 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 constituted a Business Responsibility and Sustainability Committee (BRSC) to provide direction and oversight for the formulation and execution of its ESG-related objectives and initiatives. The BRSC comprises Mr Viren Raheja and Mr Saurabh Sancheti, both Non-Executive Non-Independent Directors of the Company. The Committee plays a key role in ensuring that sustainability initiatives are effectively implemented and deliver meaningful outcomes.<br><br>The responsibilities of the BRSC include the following:<br><br>• **Policy Formulation:** To develop and recommend comprehensive policies or frameworks to the Board that are aligned with BRSR requirements and other relevant sustainability standards, while integrating ESG principles. The Committee also reviews and proposes modifications to these policies, as required<br><br>• **Implementation Oversight:** To monitor and oversee the effective implementation of the BRSR-aligned policy or framework across the organisation, ensuring consistency with the Company's sustainability goals.<br><br>• **Performance Review:** To evaluate the performance of sustainability objectives, targets, and strategies, and to provide guidance to management for their achievement. The Committee may engage external consultants or advisors to strengthen expertise and support its initiatives. | | | | | | | | |

<table>
<tr><th>Disclosure Questions</th><th>P1</th><th>P2</th><th>P3</th><th>P4</th><th>P5</th><th>P6</th><th>P7</th><th>P8</th><th>P9</th></tr>
<tr><td></td><td colspan="9">• Board Recommendations: To review and recommend the content, requirements, and any revisions to the BRSR report for approval by the Board, ensuring alignment with the Company’s overall strategic direction.<br>• Advisor Appointments: To appoint advisors or consultants, as required, to support the Committee in discharging its responsibilities with adequate subject-matter expertise.<br>• Delegation of Authority: To authorise Company officials to support the implementation and execution of the BRSR aligned policy and to carry out functions delegated by the Board of Directors, in compliance with the Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and other applicable regulations.<br>Overall, the Company has established a total of eight committees to address the interests of various stakeholder groups and to oversee the implementation of key initiatives, reinforcing its strong commitment to responsible and sustainable business practices.</td></tr>
</table>

**10. Details of Review of NGRBCs by the Company:**

<table>
<tr><th rowspan="2">Subject for Review</th><th colspan="9">Indicate whether review was undertaken by Director/ Committee of the Board/ Any other Committee</th><th colspan="9">Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)</th></tr>
<tr><th>P1</th><th>P2</th><th>P3</th><th>P4</th><th>P5</th><th>P6</th><th>P7</th><th>P8</th><th>P9</th><th>P1</th><th>P2</th><th>P3</th><th>P4</th><th>P5</th><th>P6</th><th>P7</th><th>P8</th><th>P9</th></tr>
<tr><td>Performance against above policies and follow up action</td><td colspan="9">Yes, a Board-level Committee actively oversees and monitors performance against the Company’s policies. The Committee regularly assesses the effectiveness of implementation, evaluates overall performance, and identifies opportunities for improvement to enhance the Company’s functioning.</td><td colspan="9" rowspan="2">The Company undertakes a periodic review of all its policies every two to three years in accordance with the requirements of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. In addition to this scheduled review cycle, the Company also revisits and updates its policies whenever there are changes in regulatory norms or evolving business needs, ensuring continued relevance, compliance, and alignment with operational priorities.</td></tr>
<tr><td>Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances</td><td colspan="9">Yes. Additionally, the Board and the relevant Committee, as applicable, ensure ongoing compliance with regulatory requirements and the proper maintenance of records. The Company also submits its Annual Report, where required, to the appropriate government authorities each year in accordance with applicable laws and regulations.</td></tr>
</table>

| 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 |

<table>
<tr><th>12. If answer to question (1) above is “No” i.e. not all Principles are covered by a policy, reasons to be stated:</th><th>P1</th><th>P2</th><th>P3</th><th>P4</th><th>P5</th><th>P6</th><th>P7</th><th>P8</th><th>P9</th></tr>
<tr><td>The entity does not consider the Principles material to its business (Yes/No)</td><td colspan="9" rowspan="5">Not Applicable</td></tr>
<tr><td>The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)</td></tr>
<tr><td>The entity does not have the financial or/human and technical resources available for the task (Yes/No)</td></tr>
<tr><td>It is planned to be done in the next financial year (Yes/No)</td></tr>
<tr><td>Any other reason (please specify)</td></tr>
</table>

## 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.**

The Company believes that responsible business conduct is critical to managing these impacts and enabling sustainable, long-term value creation for all stakeholders. With this understanding, Hathway continues to align its operations with the principles of ethical governance, transparent decision-making, and accountability across all levels of the organisation. The Company endeavours to strike a balanced approach that addresses the expectations of shareholders, investors, customers, employees, and the wider community, while remaining vigilant of its environmental obligations. Adherence to applicable laws and regulations forms the foundation of Hathway's operational framework. Beyond regulatory compliance, the Company ensures that its systems and processes encourage fair practices, deter misconduct, and foster a culture of openness and trust. Through these sustained efforts, Hathway seeks to embed integrity not only within its policies, but also in its everyday business conduct.

### 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 | Percentage of persons in respective category covered by the awareness programmes |
|---|---|---|---|
| Board of Directors (BoD) | 2 | Various regulatory provisions, along with updates on recent legal and statutory amendments. | 100% |
| Key Managerial Personnel | 4 | 1. Code of Conduct<br>2. Anti-Bribery and Anti-Corruption Policy<br>3. Prevention of Sexual Harassment Policy<br>4. Information Security Awareness Course | 100% |
| Employees other than BoD and KMPs | 4 | 1. Code of Conduct<br>2. Anti-Bribery and Anti-Corruption Policy<br>3. Prevention of Sexual Harassment Policy<br>4. Information Security Awareness Course | 100% |
| Workers | 4 | 1. Code of Conduct<br>2. Anti-Bribery and Anti-Corruption Policy<br>3. Prevention of Sexual Harassment Policy<br>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 | Nil | | | |
| Punishment | | | | |

**Note:** Does not include penalties by regulators in the ordinary course of business.

**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 implemented an Anti-Bribery and Anti-Corruption (ABAC) Policy to promote ethical business conduct and ensure adherence to applicable legal and regulatory requirements. The policy clearly prohibits all forms of bribery and corruption, including the offering, promising, giving, or receiving of any inducement, payment, reward, or undue advantage-whether directly or indirectly-with the intent to improperly influence business decisions or outcomes.

The ABAC Policy applies uniformly to all directors, officers, and employees of the Company, as well as to third parties acting on its behalf, including business partners, suppliers, contractors, and consultants. It reinforces a zero-tolerance stance toward bribery and corruption and supports the Company's broader commitment to integrity, transparency, and ethical practices across all operations.

The policy outlines preventive measures such as regular training programs, awareness initiatives, established reporting mechanisms, internal investigations, and remediation procedures to address potential bribery and corruption risks. It is subject to periodic reviews and audits to assess its effectiveness and ensure continued alignment with evolving anti-corruption standards and best practices.

Hathway encourages all employees and associated business partners to report any concerns or instances of improper solicitation or conduct. All reports are handled confidentially, and individuals raising concerns are protected against retaliation. Oversight of the policy's implementation and the resolution of related matters rests with the Chief of Internal Affairs.

The ABAC Policy is available on the Company's website and can be accessed via the following link: 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:**

| | FY 2025-26 | FY 2024-25 |
|---|---|---|
| Directors | Nil | Nil |
| KMPs | Nil | Nil |
| Employees | Nil | Nil |
| Workers | Nil | Nil |

**6. Details of complaints regarding conflict of interest:**

| | FY 2025-26 | | FY 2024-25 | |
|---|---|---|---|---|
| | 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 the 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 2025-26 | FY 2024-25 |
|---|---|---|
| Number of days of accounts payables | 49 | 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 2025-26 | FY 2024-25 |
|---|---|---|---|
| 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 | 1.35% | 1.43% |
| | b. Number of dealers / distributors to whom sales are made | 479 | 522 |
| | c. Sales to top 10 dealers/ distributors as % of total sales to dealers / distributors | 18.64% | 19.44% |
| Share of RPTs in | a. Purchases (Purchases with related parties / Total Purchases | 8.05% | 6.62% |
| | b. Sales (Sales to related parties / Total Sales) | 0.07% | 0.03% |
| | c. Loans & advances (Loans & advances given to related parties / Total loans & advances) | 28.61% | 45.25% |
| | d. Investments (Investments in related parties / Total Investments made) | 79.34% | 71.81% |

## 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 established mechanisms to identify, prevent, and manage potential conflicts of interest involving members of the Board. A dedicated Code of Conduct applicable to directors clearly outlines expectations relating to ethical conduct, professional integrity, and the appropriate handling of situations that may lead to conflicts of interest.

The Code specifically requires directors to disclose any personal, financial, or other interests that could, or could be perceived to, conflict with their duties and responsibilities towards the Company. By integrating these requirements into its governance framework, the Company promotes transparency and ensures that Board-level decisions remain objective and aligned with the best interests of the organisation and its stakeholders.

Regular declarations of interest, periodic compliance confirmations, and continued oversight, further enhance the robustness and effectiveness of this conflict-management process.

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

Hathway acknowledges the increasing urgency of tackling climate change and other environmental challenges that pose risks to both present and future generations. The Company has formalised its commitment to sustainability through a clearly defined ESG Policy, which provides guidance for incorporating environmental considerations into operational and strategic decision-making.

With an emphasis on reducing its environmental impact, Hathway strives to contribute to a cleaner environment and a safer, more resilient society. This is achieved by adopting technologies and practices that are safe, efficient in their use of resources, and focused on minimising emissions and operational waste. The Company also encourages the adoption of similar sustainability principles across its supply chain, promoting responsible production and consumption among its partners. Hathway views sustainability not only as an environmental responsibility but also as a means to enhance quality of life and conserve natural resources. Through continuous improvement and responsible choices, the Company aims to integrate sustainable thinking across the wider business ecosystem in which it operates.

## 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.**

| | FY 2025-26 | FY 2024-25 | Details of improvement in environmental and social impacts |
|---|---|---|---|
| Research & Development (R&D) | Nil | Nil | Nil |
| Capital Expenditure (CAPEX) | 54.62% | 55.43% | 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 is yet to implement a standalone policy specifically focused on sustainable sourcing. However, it has established a Code of Conduct for business associates, including suppliers, that clearly communicates expectations around ethical, responsible, and legally compliant conduct when engaging with the Company. This Code also underscores the importance of sustainability by incorporating key environmental, social, and governance (ESG) considerations.

Although a formal sustainable sourcing framework is yet to be instituted, the Company actively promotes responsible business practices among its suppliers and partners. Adherence to relevant legal and regulatory requirements is monitored on an ongoing basis, and the Company extends support to its partners as they work towards adopting more sustainable practices within their operations.

Looking ahead, the Company plans to formalise a sustainable sourcing policy that will encourage wider adoption of voluntary, ESG-aligned practices across its vendor network. These efforts are expected to strengthen sustainability across the supply chain and further enhance the Company's positive impact on environmental and social outcomes.

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:**

| Product | Process to safely reclaim the product |
|---|---|
| a. Plastics (including packaging) | Not Applicable. |
| b. E-Waste | Hathway primarily operates as a service provider and is not involved in manufacturing activities. However, during the course of its operations, certain hardware equipment, such as Optical Network Units (ONUs), may reach the end of their useful life or become defective and unusable. To ensure responsible handling of such electronic waste, the Company has established a structured process for safe disposal through government-authorised and certified e-waste recyclers, in full compliance with applicable environmental regulations.<br><br>Beyond disposal, the Company actively promotes resource efficiency by prioritising the reuse of viable equipment. ONUs retrieved from customer locations are collected through Hathway's network of local connection offices, where they undergo refurbishment and quality checks. Units that meet operational standards are redeployed wherever feasible, helping to extend product lifecycles and reduce unnecessary e-waste generation.<br><br>This combined approach of regulated disposal alongside refurbishment and reuse demonstrates Hathway's commitment to supporting a circular economy and minimising the environmental impact of its operations. |
| c. Hazardous Waste | Not Applicable |
| d. Other Waste | 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 the Company is in 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?**

| NIC Code | Name of Product/ Service | % of total Turnover contributed | Boundary for which the Life Cycle Perspective / Assessment was conducted | Whether conducted by independent external agency (Yes/No) | Results communicated in public domain (Yes/No) If yes, provide the web-link. |
|---|---|---|---|---|---|
| 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.**

| Name of Product / Service | Description of the risk / concern | Action Taken |
|---|---|---|
| | 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 2025-26 | FY 2024-25 |
| 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 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | Reused | Recycled | Safely Disposed | Reused | Recycled | Safely Disposed |
| Plastics (including packaging) | NA | NA | NA | NA | NA | NA |
| E-waste | 48.79 | 37.90 | - | 47.08 | 23.03 | - |
| Hazardous waste | NA | NA | NA | NA | NA | NA |
| Other waste | NA | NA | NA | NA | NA | NA |

**Note:** The data presented pertains specifically to the Company's modems/ONUs used for delivering services. 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.

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 | 44% |
| Single Band ONU | 100% |
| DOCSIS / Modem | 76% |

**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 a strong focus on safeguarding the dignity, safety, and equitable treatment of everyone associated with the organisation, including individuals across its value chain. Recognising employees as a key driver of longterm success, the Company is committed to fostering a workplace that is respectful, inclusive, and supportive of both personal and professional growth.

To support this commitment, Hathway has established a range of policies and systems aimed at ensuring equal opportunity, fair and competitive remuneration, and a safe and enabling work environment. These include structured employee engagement frameworks, formal grievance redressal mechanisms, and initiatives that promote continuous learning and career advancement. Employee health and safety remain a priority, with defined procedures to manage occupational risks and enhance overall wellbeing.

Through these measures, the Company seeks to build a workplace culture anchored in fairness, transparency, and respect for human rights, extending this approach not only to its direct employees but also to individuals engaged through thirdparty arrangements.

### ESSENTIAL INDICATORS

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

| Category | % of employees covered by | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Total (A) | Health insurance | | Accident insurance | | Maternity benefits | | Paternity Benefits | | Day Care facilities | |
| | | No. (B) | % (B/A) | No. (C) | %(C/A) | No.(D) | %(D/A) | No. (E) | %(E/A) | No. (F) | %(F/A) |
| **Permanent Employees** | | | | | | | | | | | |
| Male | 195 | 195 | 100% | 195 | 100% | - | - | 195 | 100% | 0 | 0 |
| Female | 11 | 11 | 100% | 11 | 100% | 11 | 100% | - | - | 0 | 0 |
| **Total** | **206** | **206** | **100%** | **206** | **100%** | **11** | **100%** | **195** | **100%** | **0** | **0** |
| **Other than Permanent Employees** | | | | | | | | | | | |
| Male | 119 | 119 | 100% | 119 | 100% | - | - | 0 | 0 | 0 | 0 |
| Female | 6 | 6 | 100% | 6 | 100% | 6 | 100% | 0 | 0 | 0 | 0 |
| **Total** | **125** | **125** | **100%** | **125** | **100%** | **6** | **100%** | **0** | **0** | **0** | **0** |

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

| Category | % of workers covered by | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Total (A) | Health insurance | | Accident insurance | | Maternity benefits | | Paternity Benefits | | Day Care facilities | |
| | | No. (B) | % (B/A) | No. (C) | %(C/A) | No.(D) | %(D/A) | No. (E) | %(E/A) | No. (F) | %(F/A) |
| **Permanent Workers** | | | | | | | | | | | |
| Male | 51 | 51 | 100% | 51 | 100% | - | - | 51 | 100% | 0 | 0 |
| Female | 3 | 3 | 100% | 3 | 100% | 3 | 100% | - | - | 0 | 0 |
| **Total** | **54** | **54** | **100%** | **54** | **100%** | **3** | **100%** | **51** | **100%** | **0** | **0** |
| **Other than Permanent Workers** | | | | | | | | | | | |
| Male | 2961 | 2961 | 100% | 2961 | 100% | - | 0 | 0 | 0 | 0 | 0 |
| Female | 140 | 140 | 100% | 140 | 100% | 140 | 100% | 0 | 0 | 0 | 0 |
| **Total** | **3101** | **3101** | **100%** | **3101** | **100%** | **140** | **100%** | **0** | **0** | **0** | **0** |

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

| | FY 2025-26 | FY 2024-25 |
|---|---|---|
| Cost incurred on well-being measures as a % of total revenue of the company | 0.39% | 0.31% |

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

| Benefits | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | 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.) |
| PF | 100% | 100% | Y | 100% | 100% | Y |
| Gratuity | 100% | 100% | Y* | 100% | 100% | Y* |
| ESI | 0% | 40% | Y | 0% | 18% | Y |
| Others-NPS- National Pension Scheme (voluntary) | 3.8% | 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 accessible to differently abled employees and workers. All offices have elevator access and reception staff, and the Mumbai and Bangalore offices have wheelchair-friendly access to enable ease of movement within the workspace.

Additionally, each office location has designated support personnel, including reception staff, who are available to assist differently abled individuals whenever required. This ensures that appropriate support is readily available and tailored to individual needs. Through these measures, the Company reaffirms its commitment to providing an inclusive, safe, and enabling work environment that 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 formulated specifically under the Rights of Persons with Disabilities Act, 2016. However, the Company has implemented robust internal policies that collectively uphold the principles of equal opportunity and non-discrimination. Its Welfare Policy expressly prohibits discrimination and harassment of any form, including discrimination on the basis of disability, and underscores the Company's commitment to maintaining a respectful and inclusive workplace where all individuals are treated with fairness and dignity.

In addition, the Company's ESG Policy promotes equal opportunity and a fair, non-discriminatory workplace. It emphasises dignity and respect for all employees and contractors, prohibits discrimination on any legally protected ground including disability, and supports workforce diversity by encouraging the recruitment and retention of individuals from diverse backgrounds in a supportive and inclusive work environment.

Through these existing policies, the Company aligns itself with the intent and principles of the Rights of Persons with Disabilities Act, 2016, while continuing to strengthen its ESG and inclusion framework.

5. **Return to work and Retention rates of permanent employees and workers that took parental leave.**

| | Permanent Employees | | Permanent Workers | |
|---|---|---|---|---|
| **Gender** | **Return to work rate** | **Retention rate** | **Return to work rate** | **Retention rate** |
| Male | Nil | Nil | NA | NA |
| Female | Nil | Nil | Nil | Nil |
| **Total** | **Nil** | **Nil** | **Nil** | **Nil** |

**Note:** None of the employees availed parental leave during the reporting period. Paternity leave is provided only to employees hence Return to Work and Retention Rate are reported as NA.

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

| | Yes/No | Details of the mechanism in brief |
|---|---|---|
| Permanent Workers | Yes | The Company has put in place formal mechanisms to receive and address grievances from all categories of employees and workers through its Vigil Mechanism and Whistle Blower Policy. These frameworks offer a structured, secure, and confidential avenue for individuals to raise concerns related to policy violations, legal non-compliance, or unethical conduct.<br><br>Under this mechanism, any reported concern is subjected to an appropriate review and investigation process. All disclosures and related proceedings are handled with strict confidentiality, except where disclosure is required to enable a fair investigation or to comply with applicable legal obligations.<br><br>Employees and workers may report concerns through multiple channels, including informing their immediate supervisor, via an email to hcdl.whistleblowercomplaints@hathway.net, or submitting a written communication addressed to the Company Secretary and Compliance Officer. To reinforce effective oversight and ethical governance, the Company has also constituted an Ethics & Compliance Task Force (ECTF). The ECTF is responsible for monitoring adherence to ethical standards, reviewing reported cases, and providing quarterly updates to the Audit Committee.<br><br>In addition, the Company's POSH (Prevention of Sexual Harassment) Policy establishes a specific grievance-redressal mechanism for complaints related to sexual harassment at the workplace. Such complaints may be reported to the designated reporting officer or Head of Department. Where the concerned individuals are directly involved, employees may escalate the matter to the HR Administrator. Comprehensive details of the POSH Policy, including reporting procedures and points of contact, are available on the Company's website.<br><br>For additional information, the Vigil Mechanism and Whistle Blower Policy can be accessed through the link provided on the Company's website, Click here. |
| Other than Permanent Workers | Yes | |
| Permanent Employees | Yes | |
| Other than Permanent Employees | Yes | |

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

The company does not have any employee/worker associations.

| Category | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | Total employees / workers in respective category (A) | No. of employees / workers in respective category, who are part of association(s) or Union (B) | % (B/A) | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who are part of association(s) or Union (D) | %(D/C) |
| **Total Permanent Employees** | **206** | **0** | **0%** | **241** | **0** | **0%** |
| - Male | 195 | 0 | 0% | 230 | 0 | 0% |
| - Female | 11 | 0 | 0% | 11 | 0 | 0% |
| **Total Permanent Workers** | **54** | **0** | **0%** | **62** | **0** | **0%** |
| - Male | 51 | 0 | 0% | 58 | 0 | 0% |
| **- Female** | 3 | 0 | 0% | 4 | 0 | 0% |

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

| Category | FY 2025-26 | | | | | FY 2024-25 | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Total (A) | On Health and safety measures | | On Skill upgradation | | Total (D) | On Health and safety measures | | On Skill upgradation | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | %(F/D) |
| **Employees** | | | | | | | | | | |
| Male | 195 | 0 | 0% | 0 | 0% | 230 | 0 | 0% | 0 | 0% |
| Female | 11 | 0 | 0% | 0 | 0% | 11 | 0 | 0% | 0 | 0% |
| **Total** | **206** | **0** | **0%** | **0** | **0%** | **241** | **0** | **0%** | **0** | **0%** |
| **Workers** | | | | | | | | | | |
| Male | 51 | 0 | 0% | 0 | 0% | 58 | 0 | 0% | 0 | 0% |
| Female | 3 | 0 | 0% | 0 | 0% | 4 | 0 | 0% | 0 | 0% |
| **Total** | **54** | **0** | **0%** | **0** | **0%** | **62** | **0** | **0%** | **0** | **0%** |

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 organization'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 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | Total (A) | No. (B) | % (B/A) | Total (C) | No. (D) | %(D/C) |
| **Employees** | | | | | | |
| Male | 195 | 0 | 0% | 230 | 230 | 100% |
| Female | 11 | 0 | 0% | 11 | 11 | 100% |
| **Total** | **206** | **0** | **0%** | **241** | **241** | **100%** |
| **Workers** | | | | | | |
| Male | 51 | 0 | 0% | 58 | 58 | 100% |
| Female | 3 | 0 | 0% | 4 | 4 | 100% |
| **Total** | **54** | **0** | **0%** | **62** | **62** | **100%** |

**Note:** The performance review for FY 2024-25 was done in FY 2025-26 and the performance review for FY 2025-26 is due in FY 2026-27. This prompt assessment will offer valuable insights and support the ongoing enhancement of the organization'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? | No, the Company is yet to implement a formally certified Occupational Health and Safety (OHS) Management System. Nevertheless, Hathway remains firmly committed to providing a safe and healthy work environment across all its offices and operational locations. Recognising employee wellbeing as a critical priority, the Company has put in place several safety measures aimed at minimising occupational risks and fostering a strong culture of safety. |

| | | |
|---|---|---|
| b. | What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity? | Field technicians and onsite personnel operate in accordance with clearly defined Standard Operating Procedures (SOPs) and are provided with appropriate Personal Protective Equipment (PPE), including safety kits, protective gear, and safety footwear. Although these practices are not currently governed under a formal OHS certification framework, health and safety guidelines are applied consistently across the workforce, encompassing both field operations and corporate office environments. These measures reflect the Company's ongoing efforts to maintain safe workplace standards and support the well-being of employees and contract staff. In addition, the Company has established internal audit and review mechanisms to identify workplace hazards and assess risks arising from both routine and non-routine activities. These processes are systematically applied across operational functions to monitor safety conditions and evaluate potential risks associated with daily tasks as well as infrequent or adhoc activities. Periodic inspections and internal assessments enable early identification of unsafe conditions or practices, allowing for timely corrective and preventive actions. Inputs from operational teams, supervisors, and safety personnel are actively encouraged, reinforcing a proactive and 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 also has mechanisms that empower employees and workers to report work-related hazards and, where necessary, remove themselves from situations that may pose a risk to their health or safety. Employees are encouraged to promptly report unsafe conditions, practices, or potential hazards to their respective supervisors or the Head of Human Resources. The Company promotes open communication and ensures that such concerns are addressed in a timely and effective manner. Immediate action is taken wherever required to mitigate identified risks and safeguard the wellbeing of individuals. |
| 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 2025-26 | FY 2024-25 |
|---|---|---|---|
| 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 in the contract workforce

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

The Company is committed to providing a safe and healthy workplace for all employees and workers through the implementation of robust policies, systems, and practices. Key frameworks supporting this commitment include the ESG Policy, the Prevention of Sexual Harassment (POSH) Policy, and employee welfare guidelines, all of which are designed to promote physical safety, mental well-being, and a respectful work environment.

All office premises are equipped with essential safety infrastructure such as firstaid kits, fire extinguishers, and smoke detectors to enable timely and effective response to emergencies. In addition, appropriate safety gear is provided to technical field staff to minimise occupational health and safety risks while performing their duties.

The Company also focuses on improving workplace conditions and facilitating access to medical care, where required, as part of its broader employee welfare initiatives. Responsibility for the implementation and monitoring of health and safety measures rests with management, supported by departmental teams and relevant committees, ensuring shared accountability and consistent oversight.

Through these measures, the Company seeks to foster a secure, inclusive, and supportive work environment that prioritises employee well-being and enables continuous personal and professional development.

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

| | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | 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:**

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

**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.**

Not Applicable

**LEADERSHIP INDICATORS**

**1. Does the entity extend any life insurance or any compensatory package in the event of death of:**

**(A) Employees (Yes/No):** Yes

**(B) Workers (Yes/No):** Yes

The Company provides life insurance coverage to all employees, ensuring financial protection for their immediate family members in the unfortunate event of an employee's demise. Under this benefit, the designated nominee is entitled to receive a payout equal to three times the employee's annual fixed Cost to Company (CTC), offering meaningful financial support to dependents during difficult times. In addition, compensatory benefits are also extended to workers, underscoring the Company's commitment to safeguarding the welfare and wellbeing of its entire workforce. These initiatives reflect Hathway's dedication to fostering a secure, caring, and responsible work environment that values 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 strong emphasis on regulatory compliance and has established robust processes to ensure that statutory dues are properly deducted and deposited by its value chain partners. As part of its vendor onboarding and engagement process, the Company conducts thorough due diligence, which includes verification and validation of payment challans and statutory records.

A detailed compliance assessment is undertaken to review relevant licences, registrations, and statutory filings. This assessment specifically covers obligations related to Provident Fund (PF) and Employee State Insurance Corporation (ESIC), along with confirmation that applicable taxes and statutory contributions have been duly deducted and deposited with the appropriate government authorities.

Value chain partners are required to submit documented evidence of compliance before any payments are released. This structured and disciplined approach not only ensures adherence to legal and regulatory requirements but also reinforces the Company's commitment to ethical business conduct, thereby strengthening trust among stakeholders including employees, government authorities, and business partners.

**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:**

| | 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 2025-26 | FY 2024-25 | FY 2025-26 | FY 2024-25 |
| Employees | Nil. There were no such incidences. | | | |
| Workers | | | | |

**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).**

Yes, while the Company does not currently have a formal transition assistance policy in place, it provides meaningful support to employees upon retirement to facilitate a smooth transition from active employment. Retiring employees are assisted in accessing their eligible retirement benefits, including Provident Fund (PF) and Gratuity. Additionally, the Company offers retirees the option to continue coverage under the Group Medical Insurance policy, thereby extending healthcare support beyond their period of service. Through these initiatives, the Company reflects a considerate and respectful approach, recognising the contributions of its employees and fostering a culture of care and appreciation that continues even after retirement.

**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 | Nil |
| Working Conditions | Nil |

**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.**

Not Applicable

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

Hathway acknowledges the importance of respecting and protecting the interests of all its stakeholders, while being mindful of the concerns of vulnerable and marginalised sections of society. The Company endeavours to ensure that its business activities, offerings, and decisions deliver positive and sustainable outcomes for its stakeholder community. By adopting inclusive practices and effective stakeholder engagement processes, Hathway seeks to incorporate diverse viewpoints and respond proactively to changing stakeholder needs and expectations.

### Essential Indicators

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

The Company follows a holistic and inclusive approach to identifying and engaging with its stakeholder ecosystem. This encompasses stakeholders with whom Hathway maintains direct relationships, as well as those whose interests or actions may indirectly affect the Company's operations, reputation, or longterm sustainability. Stakeholders are classified into internal and external categories based on the nature of engagement and the extent of their influence on the business. Internal stakeholders primarily include employees, who play a critical role in operational delivery and in shaping the Company's culture. External stakeholders comprise shareholders and investors, customers, suppliers, contractors, regulators, media, and the wider community.

Stakeholder identification is guided by their relevance to the business, their influence on decision-making, and their potential to impact or be impacted by, the Company's strategic objectives. These stakeholders are viewed as key contributors to the value-creation process, supporting capital formation, service development and delivery, regulatory compliance, brand strength, and community development. By developing a clear understanding of stakeholder expectations and concerns, Hathway reinforces its commitment to transparent, responsible, and mutually respectful engagement, enabling informed decision-making and supporting sustainable growth and long-term resilience.

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

| Stakeholder Group | Whether identified as Vulnerable & Marginalized Group (Yes/ No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other | Frequency of engagement (Annually/ Half yearly/ Quarterly /others – please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement |
|---|---|---|---|---|
| Employees | No | E-mails, regular meetings, annual programmes, cultural events, training sessions, notice board, Leadership meets. | Ongoing<br>Annually<br>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. |

| Stakeholder Group | Whether identified as Vulnerable & Marginalized Group (Yes/ No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other | Frequency of engagement (Annually/ Half yearly/ Quarterly /others – please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement |
|---|---|---|---|---|
| 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.**

   Stakeholder consultation is an integral part of the Company's governance and decision-making framework, particularly with respect to economic, environmental, and social matters. The Company engages with its stakeholders through multiple channels, including virtual platforms, in-person meetings, internal communication forums, and social media, depending on the nature of the stakeholder group and the subject matter. These interactions are conducted at defined intervals or on a need basis to ensure ongoing engagement and informed value creation, while remaining mindful of environmental considerations.

   Responsibility for stakeholder engagement is largely decentralised and managed by designated departmental heads, who oversee interactions with relevant stakeholder groups within their respective areas. Feedback received from stakeholders, such as employee inputs on material topics, is initially reviewed and assessed at the departmental level. Key observations, concerns, and recommendations are then consolidated and escalated to senior management.

   The Chief Human Resources Officer (CHRO), who is authorised by the Board, plays a pivotal role in bridging stakeholder feedback and Boardlevel oversight. The CHRO reviews material inputs relevant to organisational, social, and governance matters and, where necessary, presents these insights to the Board for deliberation on strategic objectives and policy decisions. In cases involving broader economic or environmental considerations, relevant functional heads similarly report material feedback to senior management and the Board through established reporting mechanisms.

   This structured consultation and escalation process ensures that stakeholder perspectives are systematically considered at appropriate levels, including the Board where required, thereby supporting transparent governance, informed decision-making and responsible business conduct.

**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 consultations are actively leveraged to support the identification and management of environmental and social issues. Through structured engagement, the Company gains valuable insights into material concerns, which inform the development of relevant policies, processes, and initiatives. Inputs received from stakeholders are utilised to strengthen operational effectiveness, foster inclusivity, and further the Company's overarching sustainability goals.

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

The Company integrates Corporate Social Responsibility (CSR) considerations into its core business objectives, recognising its responsibility to address the needs of vulnerable and marginalised stakeholder groups. In accordance with applicable legal requirements, a dedicated CSR Committee has been constituted to provide strategic direction and oversight for the Company's CSR initiatives. The Committee identifies priority intervention areas through structured internal deliberations and engagement with external partners to assess the evolving needs of disadvantaged communities. Based on these assessments, the Company focused on a Sustainable Livelihood Programme during the reporting period, aimed at empowering individuals from marginalised sections by strengthening income-generation opportunities and enhancing long-term socio-economic resilience.

**PRINCIPLE 5: Businesses should respect and promote human rights.**

The Company places strong emphasis on human rights and promotes a workplace culture rooted in respect, dignity, and fairness. Robust policies and grievance redressal mechanisms provide employees with a safe platform to address concerns. Through continuous training and awareness programmes, the Company educates stakeholders on issues of well-being and human rights. These initiatives are guided by national and global frameworks, reflecting the Company's commitment to ethical and inclusive practices.

### 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 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | Total (A) | No. of employees/ workers covered (B) | % (B / A) | Total (C) | No. of employees/ workers covered (D) | % (D / C) |
| **Employees** | | | | | | |
| Permanent | 206 | 206 | 100% | 241 | 241 | 100% |
| Other than permanent | 125 | 0 | 0% | 113 | 0 | 0% |
| **Total Employees** | **331** | **206** | **62%** | **354** | **241** | **68%** |
| **Workers** | | | | | | |
| Permanent | 54 | 54 | 100% | 62 | 62 | 100% |
| Other than permanent | 3,101 | 0 | 0% | 3,455 | 0 | 0% |
| **Total Workers** | **3,155** | **54** | **2%** | **3,517** | **62** | **2%** |

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

| Category | FY 2025-26 | | | | | FY 2024-25 | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Total (A) | Equal to Minimum Wage | | More than Minimum Wage | | Total (D) | Equal to Minimum Wage | | More than Minimum Wage | |
| | | No. (B) | % (B / A) | No. (C) | % (C / A) | | No. (E) | % (E / D) | No. (F) | % (F / D) |
| **Employees** | | | | | | | | | | |
| **Permanent** | | | | | | | | | | |
| Male | 195 | 0 | 0% | 195 | 100% | 230 | 0 | 0% | 230 | 100% |
| Female | 11 | 0 | 0% | 11 | 100% | 11 | 0 | 0% | 11 | 100% |
| **Total** | **206** | **0** | **0%** | **206** | **100%** | **241** | **0** | **0%** | **241** | **100%** |
| **Other than Permanent** | | | | | | | | | | |
| Male | 119 | 0 | 0% | 119 | 100% | 107 | 0 | 0% | 107 | 100% |
| Female | 6 | 0 | 0% | 6 | 100% | 6 | 0 | 0% | 6 | 100% |
| **Total** | **125** | **0** | **0%** | **125** | **100%** | **113** | **0** | **0%** | **113** | **100%** |
| **Workers** | | | | | | | | | | |
| **Permanent** | | | | | | | | | | |
| Male | 51 | 0 | 0% | 51 | 100% | 58 | 6 | 10% | 52 | 90% |
| Female | 3 | 0 | 0% | 3 | 100% | 4 | 0 | 0% | 4 | 100% |
| **Total** | **54** | **0** | **0%** | **54** | **100%** | **62** | **6** | **10%** | **56** | **90%** |
| **Other than Permanent** | | | | | | | | | | |
| Male | 2,961 | 117 | 4% | 2,844 | 96% | 3,279 | 107 | 3% | 3,172 | 97% |
| Female | 140 | 4 | 3% | 136 | 97% | 176 | 4 | 2% | 172 | 98% |
| **Total** | **3,101** | **121** | **4%** | **2,980** | **96%** | **3,455** | **111** | **3%** | **3,344** | **97%** |

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 | 1,70,01,100.00 | 0 | - |
| Employees other than BoD and KMP | 311 | 8,50,008.00 | 17 | 6,63,647.00 |
| Workers | 3,012 | 3,22,026.00 | 143 | 2,96,118.00 |

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

| | **FY 2025-26** | **FY 2024-25** |
|---|---|---|
| Gross wages paid to females as % of total wages | 4.32% | 4.26% |

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 or its operations. This responsibility for addressing such concerns continues to rest with the Regional Human Resource Department, which acts as the primary point of contact for employees to raise grievances or concerns related to human rights at the regional level.

The Company has a defined escalation framework in place whereby concerns that are not resolved at regional level may be escalated to the Head of Human Resources for further review and appropriate action. In addition, employees retain the option to approach the Chairman of the Audit Committee in respect of unresolved or serious grievances, including those related to human rights.

This structured, multi-level mechanism ensures accessibility, confidentiality, and impartial review of concerns, and reflects the Company's ongoing commitment to respecting human rights and providing effective channels for grievance redressal across its operations.

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

The Company has put in place a welldefined internal framework to address and resolve human rights-related grievances effectively. It follows a formal human rights policy that ensures fairness, nondiscrimination, and equal opportunity in all employment practices, with decisions based solely on merit and performance.

To support grievance redressal, the Company maintains confidential and accessible channels through which employees and other stakeholders can report concerns.

These grievances are reviewed and addressed in a timely and impartial manner as part of the Company's broader governance and management structure. Human rights due diligence processes are regularly carried out to identify and mitigate potential or actual adverse impacts arising from business activities.

The Company follows a zero-tolerance stance towards human rights violations, and any instances of non-compliance by employees, contractors, or third-party partners are dealt with strictly in accordance with internal policies. Additionally, it prohibits child labour, forced labour, and any form of involuntary labour across its operations and value chain, while respecting employees' rights to freedom of association and collective bargaining without fear of retaliation. Through continuous monitoring and adoption of best practices, the Company remains committed to strengthening its grievance redressal mechanisms and promoting human rights.

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

| | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | 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 2025-26 | FY 2024-25 |
|---|---|---|
| Total Complaints reported under Sexual Harassment on 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 implemented well-defined policies, procedures, and safeguards to protect complainants from any adverse consequences arising from reports of discrimination or harassment. Employees may raise concerns through designated and accessible channels, including their Reporting Authority, Head of Department, or Local HR Administrator.

Upon receipt of a complaint, the matter is reviewed by the appropriate internal committee constituted in accordance with applicable legal requirements. All complaints are handled promptly and with strict confidentiality. Where necessary, interim measures to support the complainant's well-being, such as as temporary relocation to another office or the grant of up to 15 days of leave, may be provided, depending on the circumstances.

The Company enforces a strict zero-tolerance policy against retaliation. Any act of reprisal against an individual for raising a complaint is treated as serious misconduct. This framework reinforces a culture of trust, ensures employees can report concerns without fear or intimidation, and guarantees that all complaints are addressed fairly, ethically, and in compliance with legal standards.

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

Yes, the Company integrates human rights obligations into its business contracts and agreements wherever applicable. These documents are aligned with the Company's Code of Conduct and are written in clear, understandable language to ensure that all parties are aware of and adhere to their responsibilities.

Business partners and counterparties are required to comply with all applicable laws and regulations, including labour laws, minimum wage requirements, statutory provisions safeguarding against child labour, and legislation addressing harassment and discrimination. Relevant state and national human rights guidelines are also referenced within contractual terms where necessary.

By incorporating these human rights provisions into its agreements, the Company encourages ethical conduct, strengthens accountability, and promotes responsible business practices throughout its value chain. This contractual approach supports the Company's ongoing commitment to upholding and respecting human rights across all business relationships.

**10. Assessment for the year:**

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|---|---|
| Child labour | 100% of Hathway offices (i.e., 24 offices) were assessed during the reporting year for compliance with applicable laws including child labour, forced or involuntary labour, sexual harassment, workplace discrimination, and wage-related practices. 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. Through these mechanisms, Hathway ensures that all offices operate in compliance with legal obligations and ethical standards concerning employee rights and welfare. |
| Forced/involuntary labour | |
| Sexual harassment | |
| Discrimination at workplace | |
| Wages | |
| Others – please specify | |

**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; thus, no corrective actions were required.

**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, oversight of human rights-related matters is maintained through existing international frameworks, including adherence to the Company's Code of Conduct, which sets out expected standards of behaviour, ethical practices and compliance with applicable laws and regulations.

The Code of Conduct applies across the Company's operations and serves as the primary reference for identifying and addressing issues related to discrimination, misconduct, or potential human rights concerns. Employees are periodically made aware of these expectations through internal communications and are encouraged to report any concerns to their respective department heads or designated internal authorities.

Any reported instances or concerns are reviewed and addressed in accordance with the Company's established grievance redressal mechanisms. These mechanisms provide a structured and accountable process for examination and resolution of issues, thereby enabling the Company to monitor and manage human rights-related risks within the scope of its existing operational and governance processes.

**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:**

| | % of value chain partners (by value of business done with such partners) that were assessed |
|---|---|
| Sexual Harassment | 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. |
| Discrimination at workplace | |
| 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 acknowledges that sustainable growth depends on meeting current needs while safeguarding environmental resources for future generations. It incorporates environmental responsibility into both strategic planning and day-to-day operations, with a focus on minimizing adverse impacts and improving the efficient use of resources. The Company works closely with internal teams and external partners to jointly develop and apply practical, effective solutions. Through this collaborative approach, it seeks to make a positive contribution to long-term social well-being and environmental stewardship. All initiatives are driven by adherence to applicable environmental regulations and the adoption of recognized best practices, including those related to energy efficiency, waste reduction, water stewardship, and pollution prevention.

### Essential Indicators

1. **Details of total energy consumption (in GJ) and energy intensity, in the following format:**

| Parameter | FY 2025-26 | FY 2024-25 |
|---|---|---|
| **From renewable sources** | | |
| Total electricity consumption (A) | Nil | Nil |
| Total fuel consumption (B) | Nil | Nil |
| Energy consumption through other sources (C) | Nil | Nil |
| **Total energy consumed from renewable sources (A+B+C)** | **Nil** | **Nil** |
| **From non-renewable sources** | | |
| Total electricity consumption (D) | 65,936.37 | 55,858.31 |
| Total fuel consumption (E) | 10,439.36 | 4,713.62 |
| Energy consumption through other sources (F) | - | - |
| **Total energy consumed from non-renewable sources (D+E+F)** | **76,375.73** | **60,571.93** |
| **Total energy consumed (A+B+C+D+E+F)** | **76,375.73** | **60,571.93** |
| **Energy intensity per rupee of turnover** (Total energy consumed / Revenue from operations) (GJ per million INR) | 13.12 | 10.06 |
| **Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)** (Total energy consumed / Revenue from operations adjusted for PPP) (GJ per million USD) | 266.93 | 207.83 |
| **Energy intensity in terms of physical output** | - | - |
| Energy intensity (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

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 2025-26 | FY 2024-25 |
|---|---|---|
| **Water withdrawal by source (in kilolitres)** | | |
| (i) Surface water | Nil | Nil |
| (ii) Groundwater | Nil | Nil |
| (iii) Third party water | 47,374.74 | 50,948.91 |

| Parameter | FY 2025-26 | FY 2024-25 |
|---|---|---|
| (iv) Seawater / desalinated water | Nil | Nil |
| (v) Others | Nil | Nil |
| **Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)** | **47,374.74** | **50,948.91** |
| **Total volume of water consumption (in kilolitres)** | **47,374.74** | **50,948.91** |
| **Water intensity per rupee of turnover** (Total water consumption / Revenue from operations) (kL per million INR) | 8.14 | 8.46 |
| **Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)** (Total water consumption / Revenue from operations adjusted for PPP) (kL per million USD) | 165.57 | 174.82 |
| **Water intensity in terms of physical output** | - | - |
| **Water intensity** (optional) – the relevant metric may be selected by the entity | - | - |

**Note:** We have calculated our water consumption considering an empirical factor

**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

**4. Provide the following details related to water discharged:**

| Parameter | FY 2025-26 | FY 2024-25 |
|---|---|---|
| **Water discharge by destination and level of treatment (in kilolitres)** | The Company uses water for drinking and sanitary purposes only. | |
| (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 | | |
| **Total water discharged (in kilolitres)** | | |

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

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.

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

| Parameter | Please specify unit | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| NOx | MT | 1.36 | The Company has initiated measures to enable the tracking and reporting of air emissions for FY2025–26. Data for this indicator is not available for FY2024–25. |
| SOx | MT | 0.73 | |
| Particulate matter (PM) | MT | 0.09 | |
| Persistent organic pollutants (POP) | - | - | |
| Volatile organic compounds (VOC) | - | - | |
| Hazardous Air Pollutants (HAP) | - | - | |
| Others – please specify | - | - | |

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

No

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

| Parameter | Unit | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| **Total Scope 1 emissions**<br>(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | $tCO_2e$ | 2,270.94 | 1,100.83 |
| **Total Scope 2 emissions**<br>(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | $tCO_2e$ | 13,315.48 | 11,280.28 |
| **Total Scope 1 and Scope 2 emissions per rupee of turnover**<br>(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations) | $tCO_2e$/ million INR | 2.68 | 2.06 |
| **Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)**<br>(Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) | $tCO_2e$/ million USD | 54.47 | 42.48 |
| **Total Scope 1 and Scope 2 emission intensity in terms of physical output** | | - | - |
| **Total Scope 1 and Scope 2 emission intensity (optional)**<br>– the relevant metric may be selected by the entity | | - | - |

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

No

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 2025-26 | FY 2024-25 |
|---|---|---|
| **Total Waste generated (in metric tonnes)** | | |
| Plastic waste **(A)** | - | - |
| E-waste **(B)** | 57.67 | 53.66 |

| Parameter | FY 2025-26 | FY 2024-25 |
|---|---|---|
| Bio-medical waste **(C)** | - | - |
| Construction and demolition waste **(D)** | - | - |
| Battery waste **(E)** | 39.10 | 41.30 |
| Radioactive waste **(F)** | NA | NA |
| Other Hazardous waste. Please specify, if any. **(G)** | - | - |
| Other Non-hazardous waste generated **(H)**. Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector) | - | - |
| **Total (A + B + C + D + E + F + G + H)** | **96.77** | **94.96** |
| **Waste intensity per rupee of turnover** (Total waste generated / Revenue from operations) (MT/million INR) | 0.017 | 0.016 |
| **Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)** (Total waste generated / Revenue from operations adjusted for PPP) (MT/million USD) | 0.34 | 0.33 |
| **Waste intensity in terms of physical output** | - | - |
| **Waste intensity (optional)** – the relevant metric may be selected by the entity | - | - |
| **For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)** | | |
| **Category of waste (E-Waste)** | | |
| (i) Recycled | 96.77 | 94.96 |
| (ii) Re-used | 0 | 0 |
| (iii) Other recovery operations | - | - |
| **Total** | **96.77** | **94.96** |
| **For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)** | | |
| **Category of waste (E-Waste)** | | |
| (i) Incineration | - | - |
| (ii) Landfilling | - | - |
| (iii) Other disposal operations | - | - |
| **Total** | **-** | **-** |

**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/ evaluation/ 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:**

| S. No. | Location of operations/offices | Type of operations | Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any. |
|---|---|---|---|
| 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:**

| S. 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 –** Not Applicable.

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

| Parameter | FY 2025-26 | FY 2024-25 |
|---|---|---|
| **Water withdrawal by source (in kilolitres)** | Not Applicable | |
| (i) Surface water | | |
| (ii) Groundwater | | |
| (iii) Third party water | | |
| (iv) Seawater / desalinated water | | |
| (v) Others | | |
| **Total volume of water withdrawal (in kilolitres)** | | |
| **Total volume of water consumption (in kilolitres)** | | |
| **Water intensity per rupee of turnover** (Water consumed / turnover) | | |
| **Water intensity (optional)** – the relevant metric may be selected by the entity | | |
| **Water discharge by destination and level of treatment (in kilolitres)** | Not Applicable | |
| (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 | | |

| Parameter | FY 2025-26 | FY 2024-25 |
|---|---|---|
| (iii) Into Seawater | Not Applicable | |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| (iv) Sent to third-parties | | |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| (v) Others | | |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| **Total water discharged (in kilolitres)** | | |

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

No

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

| Parameter | Unit | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| **Total Scope 3 emissions** (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | - | - | |
| **Total Scope 3 emissions per rupee of turnover** | - | | |
| **Total Scope 3 emission intensity** (optional) – the relevant metric may be selected by the entity | - | | |

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

No

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:**

| S. 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 2025-26. | | | |

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

The Company has established a Business Continuity and Disaster Management framework to minimise operational disruptions and support timely recovery in the event of unforeseen incidents. The framework focuses on identifying critical business operations and safeguarding essential infrastructure to maintain continuity.

It is periodically reviewed and updated to remain aligned with evolving risks and external conditions. Through this structured approach, the Company aims to strengthen operational resilience and ensure continuity of key business activities during both natural and man-made emergencies.

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**

      Information not available with us for FY 2025-26

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

The Company is committed to maintaining ethical conduct and transparency in all interactions with public authorities and regulatory bodies. It ensures timely and accurate communication with authorities while upholding the principles of accountability, fairness, and balanced stakeholder representation. Only authorised and appropriately trained personnel engage with trade bodies and industry associations involved in policy discussions. These engagements are aligned with the Company's sustainability priorities and corporate citizenship values. Through constructive dialogue and informed participation, the Company seeks to contribute to policy development that fosters inclusive growth, strengthens regulatory compliance, and supports responsible business practices.

**Essential Indicators**

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

1

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

| S. 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. 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.**

| S. No. | Public policy advocated | Method resorted 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. | Pre-Consultation Paper on Review of existing TRAI Regulations on Interconnection matters | Through Internet Service Providers Association of India (ISPAI) | Yes | Annually | https://trai.gov.in/sites/default/files/2025-04/ISPAI%20Comments_0.pdf |
| 2. | The Reporting System on Accounting Separation (Amendment) Regulations, 2025 | | Yes | Annually | https://trai.gov.in/sites/default/files/2025-11/ISPAI_10112025.pdf |

| S. No. | Public policy advocated | Method resorted 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 |
|---|---|---|---|---|---|
| 3. | Draft the Telecommunication Tariff (Seventy Second Amendment) Order, 2025 | | Yes | Annually | https://trai.gov.in/sites/default/files/2025-11/ISPAI_TTO_10112025.pdf |
| 4. | Consultation Paper on Review of existing TRAI Regulations on Interconnection matters | | Yes | Annually | https://trai.gov.in/sites/default/files/2025-12/ISPAI_16122025.pdf |
| 5. | Consultation Paper on Review of Tariff for Domestic Leased Circuits (DLCs) | | Yes | Annually | https://trai.gov.in/sites/default/files/2026-03/ISPAI_03032026.pdf |

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

The Company is dedicated to fostering inclusive and sustainable community development, with a strong focus on equitable progress. It embeds inclusive principles and Corporate Social Responsibility (CSR) priorities within its overall business strategy. Guided by the ethos of shared growth, the Company strives to contribute to a society that supports all segments, particularly underserved communities. Its CSR initiatives are centred on accessible healthcare, environmental sustainability, and social awareness, with the objective of enhancing quality of life and enabling long-term community development.

### Essential Indicators

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

| Name and brief details of 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 |
|---|---|---|---|---|---|
| Not Applicable for the current CSR projects | | | | | |

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

| S. No. | Name of the project for which R&R is going on | State | District | No. of Project Affected Families (PAFs) | % of PAFs covered by R&R | Amounts paid to PAFs in the FY (In ₹) |
|---|---|---|---|---|---|---|
| No Project related to R&R 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 2025-26 | FY 2024-25 |
|---|---|---|
| Directly sourced from MSMEs/ Small producers | 66.52% | 57.13% |
| Directly from within India | 100% | 100% |

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

| Location | FY 2025-26 | FY 2024-25 |
|---|---|---|
| Rural | 0.67% | 0.16% |
| Semi urban | 1.65% | 0.16% |
| Urban | 6.15% | 11.72% |
| Metropolitan | 91.53% | 87.96% |

(Place are categorized 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 |
|---|---|
| Not Applicable | |

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

| S. No. | 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:**

| S. No. | Intellectual Property based on traditional knowledge | Owned/ Acquired (Yes/No) | Benefit shared (Yes/No) | Basis of calculating of benefit share |
|---|---|---|---|---|
| The Company does not have any registered Intellectual Property based on traditional knowledge | | | | |

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 groups |
|---|---|---|---|
| 1 | Rural Transformation - small and marginal farmers, livestock owners and landless | 31,809 | 100% |

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

The growing reach of the internet and rapid technological advancements have significantly transformed how individuals interact, communicate, and access services. Recognising this shift, the Company places strong emphasis on ethical, responsible, and regulatorycompliant engagement with its customers. By leveraging advanced digital technologies, it delivers innovative, usercentric solutions at competitive prices. Through continuous enhancement of its systems and processes, Hathway aims to strengthen customer experience, adapt to evolving expectations, and ensure that its services remain accessible, relevant, and dependable.

### Essential Indicators

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

The Company has established a robust and structured mechanism for receiving, addressing, and resolving consumer complaints and feedback in accordance with the Telecom Consumer Complaint Redressal Regulations, 2012 issued by the Telecom Regulatory Authority of India (TRAI), and amendments thereto. A two-tier grievance redressal system is in place to ensure timely, transparent, and effective resolution of consumer concerns.

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 responsiveness and improve customer experience, the Company has deployed Diva, an AI-driven chatbot that assists customers in resolving queries, logging complaints, tracking service requests, and connecting with customer service representatives where required.

Upon receipt of a complaint, a unique docket or complaint reference number is generated and communicated to the customer via SMS on the registered mobile number. All complaints are addressed and resolved within the timelines prescribed under TRAI's Quality-of-Service regulations. Once resolved, customers receive a closure intimation via SMS, detailing the action taken.

In instances where customers are dissatisfied with the resolution or if the complaint is not addressed within the stipulated time, they may escalate the matter to the designated Appellate Authority in line with the prescribed escalation process.

Through this comprehensive and multichannel grievance redressal mechanism, the Company seeks to ensure prompt resolution, transparency, and continuous improvement in customer service delivery.

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

| | 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:**

| | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | 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 | No Remarks | 0 | 0 | No Remarks |
| Advertising | 0 | 0 | | 0 | 0 | |
| Cyber-security | 0 | 0 | | 0 | 0 | |
| Delivery of essential services | Customer complaints are resolved as per applicable legislations, including sector specific. | | | Customer complaints are resolved as per applicable legislations, including sector specific. | | |
| Restrictive Trade Practices | 0 | 0 | | 0 | 0 | |
| Unfair Trade Practices | 0 | 0 | | 0 | 0 | |
| Others | 0 | 0 | | 0 | 0 | |

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

| | Number | Reason for recall |
|---|---|---|
| Voluntary recalls | 0 | - |
| Forced recalls | 0 | - |

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 instil 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.**

During the reporting period, there were no instances of product recalls, penalties, or regulatory actions relating to advertising practices, delivery of essential services, or the safety of the Company’s products or services. Notwithstanding the absence of such incidents, the Company has continued to strengthen its preventive and corrective controls, particularly in the areas of cybersecurity, data privacy, and service continuity, as part of its ongoing risk management approach.

We still implemented preventive measures that have been fully integrated and are currently operational:

1. **Advanced Perimeter and Application Defence:**

    - **Next-Generation (NGFW):** Deployed to provide enhanced network security and advanced threat detection at network boundaries.
    - **Web Application Firewall (WAF):** Implemented to safeguard customer-facing and internal applications from common web-based vulnerabilities.

2. **Continuous Monitoring and Endpoint Security:**

    - **Security Operations Centre (SOC):** A dedicated SOC operates on a continuous basis to monitor systems, identify potential threats, and support incident response activities.
    - **Endpoint Detection and Response (EDR):** Endpoint security solutions are deployed across corporate systems to detect and contain suspicious activities in a timely manner.

3. **Data Protection and Privacy Controls:**

    - **Data Loss Prevention (DLP):** Measures are in place to monitor and prevent unauthorised movement or leakage of sensitive customer and business information.
    - **Encryption Protocols:** Data is protected through encryption mechanisms for both data at rest and data in transit.

4. **Lifecycle Security Assessments:**

    - **Infrastructure and Application Audits:** Periodic vulnerability assessments and penetration testing are conducted across infrastructure and applications to proactively identify and address potential security gaps.
    - **Identity & Access Management (IAM):** Zero-trust principles enforced through Multi-Factor Authentication (MFA), Privileged Identity/Access Management (PIM/PAM), and comprehensive Identity Governance and Administration (IGA).
    - **Governance & Assurance:** Regular vendor security audits, periodic user access reviews, and mandatory annual configuration and rule reviews for Firewalls, DLP, and EDR systems to prevent configuration drift.

**Delivery of Essential Services and Regulatory Compliance**

1. **Service Continuity:**

    - The cybersecurity and information security measures implemented by the Company contribute to the reliable delivery of essential ISP and CATV services by reducing the risk of service disruptions due to cyber incidents.

2. **Regulatory Standing:**

    - During the reporting period, there were no product recalls or penalties imposed by regulatory authorities relating to the safety or quality of the Company's products or services. The Company continues to operate in compliance with applicable laws and regulations and remains attentive to evolving regulatory requirements, including those related to data protection and information security.

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 – Provides comprehensive details on plans, services, and support.

   - **Mobile Application:** Hathway Broadband App – 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 Ver 9.0 – 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 be 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.