



**HATHWAY CABLE AND DATACOM LIMITED**

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<b>Policy Name</b>	<b>Environmental, Social and Governance (ESG)Policy</b>
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Issuing Authority	Board of Directors of the Company
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### **Sustainability**

Hathway Cable and Datacom Limited 'Hathway' is committed to conducting its business in a way that positively adds to environmental and societal benefits. The company recognizes the significance of corporate actions toward the mitigation of climate change impacts and is committed to growing responsibly and sustainably. The company is improving its sustainability efforts and is mindful of the growing demand for transparency and accountability in disclosure practices. The company has taken measures to increase its transparency and has published its first Business Responsibility and Sustainability Report (BRSR) for FY 2022-23. The ESG Policy aims to establish a comprehensive framework defining the integration of ESG into all business and investment activities.

### **Purpose of ESG Policy**

The primary aim of this policy is to guarantee that Hathway operates its business in a sustainable and accountable manner. It will also allow Hathway to evaluate different environmental, social, and governance aspects that have an impact on the business and determine how to better manage the risks associated with each of them. With this policy it also aims to extend its sustainable aspirations and its alignment across value chain.

### **Scope**

This policy outlines our expectations for everyone who collaborates with us, including employees, contractors, and other partners in the value chain, as appropriate.

### **Alignment**

Hathway's ESG policy is in alignment with Hathway's Code of Conduct policies and Sustainable Development Policy. It also takes into the account framework laid down by the various statutory Act, Rules, and Regulations envisaging the ESG principles as applicable to the Company.

### **ESG Governance**

The implementation of Hathway's ESG policy is undertaken by the BRSR committee and the same is duly updated to the Board.

### **Policy Commitment**

**Environment:** Hathway is devoted to satisfying the requirements of its clients and other stakeholders. This objective is achieved through ongoing enhancements to operations, and by minimizing the negative impact on the environment. Our primary focus is on management of e-waste which includes sustainable disposal of equipment's like modems (that have reached the end of life) and other electronic waste. We encourage the use of advanced technology to lower energy consumption and to promote a circular economy that is restorative and regenerative. Additionally, Hathway advocates for and implements proper waste management practices to contribute to a clean and healthy environment.

➤ **Climate Change Action**

Hathway understands the growing need to adapt new practices to counter climate change. The company will ensure all of its operations are environmentally friendly. To this end, the company shall:

- Ensure efficient use of resources.
- Prioritize the utilization of parts/raw materials that are sustainable for the organisation.
- Ensure adoption of activities that result in energy conservation and reduction of GHG Emissions into the atmosphere.
- Adopt the latest technologies that make our services climate resilient and at the same time reduce our negative impacts on climate.
- Understand and map the climate change related risks and opportunities for its businesses for resilient operations.

➤ **Circular Economy**

Hathway acknowledges the importance of circularity in its operations. The company will strive to implement circularity practices where possible in all its operations through reuse and refurbishment of parts and products.

➤ **Waste Management**

Hathway recognizes the importance and urgency of effective waste management to mitigate the negative impacts of waste-related pollution. To this aim, Hathway shall:

- Endeavor to minimize waste generation at its source
- Foster innovation and explore sustainable solutions to promote a circular economy by reusing waste
- Place special emphasis on e-waste and its disposal within regulatory standards
- The company will also ensure to sell parts of products that have reached end of its life to registered vendors.
- Handle and regulate various types of waste (both dry and wet, and hazardous and non-hazardous) in compliance with regulatory standards.

➤ **Environment Protection and Pollution Prevention**

Hathway recognizes the significance of combating pollution and its detrimental impacts on the ecosystem. The company strives to promptly and efficiently tackle pollution caused by its activities, encompassing air, water, land, and noise pollution. Accordingly, Hathway shall:

- Implement measures to reduce pollution at its source to mitigate the adverse effects on air, water, noise, and land.
- Abide by all pertinent legal regulations related to pollution prevention and control at all its locations, and periodically monitor compliance as applicable.



- Collaborate with and support programs that promote the development of biodiversity and floral/faunal ecosystem developments.

➤ **Sustainable Sourcing**

Hathway is committed to conducting sustainable material sourcing and procurement practices that have minimal impact on the environment. To achieve this goal, the company shall:

- Establish guidelines on material and service requirements that prioritize environmentally friendly and sustainable options.
- Establish sustainable practices across supply chain by means of guidelines and sensitization.
- Encourage practices that promote engagement with suppliers to enhance their sustainability performance by providing feedback and monitoring their progress.

**Social:** Hathway acknowledges its responsibilities towards stakeholders and society as a whole. Employee health, well-being and development are paramount considerations in all of our processes and operations. Safety is a non-negotiable aspect of our work. We strive for an inclusive future that upholds equality for all and prohibits any form of discrimination. Hathway is committed to eradicating child labour and forced labour practice while upholding the rights and dignity of all. Hathway strives to promote the prosperity of local communities through various well-being programs.

➤ **Employee Engagement (Training and Development)**

Hathway acknowledges the importance of various employee engagement programs that can contribute to their development and enhance business performance. Therefore, it shall:

- Conduct training and development programs to enhance employees' skills and promote career growth.
- Establish a feedback mechanism by conducting surveys to understand employees' satisfaction levels and work on identified gaps.
- Promote employee recognition programs to acknowledge and reward outstanding performance.
- Continuously improve our ESG performance by setting clear expectations and ensuring accountability. Develop employee awareness program on latest ESG trends in the telecom sector.

➤ **Employee Health, Safety and Wellbeing**

Hathway acknowledges the significance of physical and mental wellbeing for all its employees, and endeavours to provide a secure and encouraging work environment. It is devoted to achieving zero accidents and fatalities. For this purpose, the company shall:

- Provide training and guidance to employees on occupational health and safety.



- Ensure that all employees are provided with suitable personal protective equipment (PPE), healthcare benefits, and medical coverage.
- Schedule regular health check-ups for all employees.
- Facilitate one-on-one interactions with employees to address any concerns they may have.
- Encourage employees to participate in training programs on mental health and stress management.
- Organize events, celebrate festivals, and promote cultural development to improve work-life balance.
- Adhere to the company's environmental, health, and safety (EHS) policies.

➤ **Inclusion and Diversity**

Hathway is committed to promoting equal opportunities and maintaining a non-discriminatory and fair workplace environment. It recognizes the importance of equality and aims to provide equal opportunities to attract, retain, and motivate employees. To achieve this, it shall:

- Foster a workplace that upholds fairness and dignity for all workers and contractors.
- Refrain from discriminating against individuals based on their race, caste, religion, skin colour, lineage, social standing, gender, sexual preference, age, citizenship, cultural heritage, disability, or any other safeguarded group.
- Recruit and retain employees from diverse backgrounds and establish a nurturing and supportive environment.

➤ **Human Rights**

Hathway is dedicated to adhering to basic human rights consistent with the legitimate function of business for all parties involved. To accomplish this objective, the company will:

- Refrain from hiring minors at any of its workplaces.
- Guarantee that no form of coerced labour is employed.
- Abide by all relevant laws and acknowledge globally established human rights principles.

➤ **Customer Satisfaction**

Hathway is committed to promoting equal opportunities and maintaining a non-discriminatory and fair workplace environment. It recognizes the importance of employee remuneration and aims to provide reasonable and sufficient compensation to attract, retain, and motivate employees. To achieve this, it shall:

- Promote its products and services based on their individual merits and avoid making any misleading or unjustifiable claims.
- Deliver top-quality products and services that meet all relevant standards.
- Adhere to all applicable marketing and labelling laws.
- Interact with customers in a professional, equitable, and transparent manner.



➤ **Grievance Redressal Mechanism**

Hathway shall establish an easily accessible and transparent mechanism for registering complaints and grievances. It recognizes the importance of redressal mechanism to retain talent and customers. It shall also attend to community needs and voices. To accomplish this, it shall:

- The complaint mechanism shall be available in multiple and formats to ensure accessibility to all.
- All grievances are addressed in a timely and fair manner. The company shall establish a well-defined escalation process for grievance resolution, with clear timelines for each stage of escalation. The process shall ensure that all grievances are resolved in a just and equitable manner, without any discrimination or bias.
- Hathway shall empower its customers to raise their grievances effectively. The company shall provide training and awareness programs to its customers on how to raise complaints and grievances, including the use of the complaint mechanism. The company shall also ensure that its employees are adequately trained to handle grievances and provide effective customer service.
- Hathway shall continuously review and improve its grievance redressal mechanism based on feedback received from customers, stakeholders, and employees. The company shall regularly monitor and analyze the data generated from the complaint mechanism to identify systemic issues and implement appropriate remedial measures.

➤ **Stakeholder Engagement**

Stakeholder engagement is a crucial aspect of our business operations as it helps businesses build strong relationships, understand the needs and concerns, and create value for all parties involved. To that end Hathway shall:

- Identify and prioritize stakeholders, including employees, customers, suppliers, investors, communities, and regulators. Understand the needs, interests, and concerns of each stakeholder group and develop a strategy for engaging with them.
- Establish regular communication channels stakeholders to ensure that they are informed about relevant issues and developments.
- Encourage feedback and participation from stakeholders and provide opportunities for them to express their views, suggestions, and concerns.
- Use stakeholder feedback to inform decision-making processes, including ESG-related policies and practices.

**Governance:** Hathway is dedicated to conducting all of its business dealings in a professional, fair, and honest manner. We aim to cultivate trust by increasing transparency in our disclosures and aligning with major global frameworks. Our goal is to establish a culture that is responsible and responsive, with a strong foundation of corporate governance that will support the achievement of our ESG goals and targets.



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

Hathway is obligated to avoid any inadvertent involvement in corrupt activities. To accomplish this goal, it shall:

- Conduct all business operations in a professional, equitable, and honest manner.
- Pledge to prevent, discourage, and identify bribery and other corrupt conduct and acknowledge the strict penalties for any infringements.
- Ensure compliance with all applicable local and national regulations regarding anti-bribery and anti-corruption in every location where Hathway conducts its operations.

➤ **Information Security and Data Privacy**

Hathway understands the significance of safeguarding the confidentiality and security of all information, whether it pertains to the company or individuals. Given that it receives, handles, and retains both company and customer information, Hathway shall:

- Respect and safeguard all confidential information and intellectual property of the company and other related entities.
- Report any information security incidents or doubtful activities in accordance with the company guidelines.
- Conduct training and awareness-raising sessions for its employees on information security and cybersecurity measures.

➤ **Anti-Fraud**

Hathway strongly opposes the misuse of its products and processes. In pursuit of this goal, it shall:

- Utilize all tangible and intangible corporate assets, including computer and communication equipment, solely for the purpose for which they are granted and to run the business.
- Implement suitable measures to encourage employees to report any instances of fraud, suspected fraud, or fraud-prone locations, without fear of any negative consequences.

➤ **Regulatory Compliance**

Hathway shall ensure adherence to constantly changing regulatory requirements in the telecom sector. To ensure compliance, it shall:

- Continuously monitor and review all regulatory requirements and update internal policies and procedures accordingly.
- To ensure compliance, Hathway shall maintain accurate records of all licenses and related terms and conditions and ensure that all business activities are conducted within the scope of the licenses.
- Hathway shall continuously review and adopt best industry practices, including those related to network security, consumer protection, and data privacy.
- Hathway shall provide regular training to all employees on relevant laws, regulations, and policies and raise awareness about the importance of compliance through various communication channels.

➤ **Public Advocacy**

Hathway is dedicated towards responsible communication that fosters growth and development in an equitable manner leading to informed and transparent decisions. To this end it shall:

- Collaborate with associations and governments for influencing decisions on important matters for the growth of the sector in which it operates.
- Utilize sectoral knowledge for the common good.
- Advocate whenever possible with sound and strong corporate governance.
- Adopt ethical advocacy actions governed internally prior to any kind of public consultations.

The policy will be reviewed for appropriateness on a regular basis and revised as needed.