

# BUSINESS RESPONSIBILITY REPORT

## Section A

### General Information about the Company

Corporate Identity Number (CIN) of the Company	L74899DL1995PLC070609	
Name of the Company	Bharti Airtel Limited	
Registered Address	Bharti Crescent, 1, Nelson Mandela Road, Vasant Kunj, Phase II, New Delhi - 110070	
Website	<a href="http://www.airtel.com">www.airtel.com</a>	
Email ID	<a href="mailto:compliance.officer@bharti.in">compliance.officer@bharti.in</a>	
Financial Year reported	2019-20	
Sector(s) that the Company is engaged in (Industrial activity code-wise)	<ol style="list-style-type: none"> <li>1. Telecommunication Services – mobile telecommunication, fixed line services and telecommunication enterprise solutions</li> <li>2. Direct-to-Home Services (through subsidiary company)</li> <li>3. Payments Bank (through subsidiary company)</li> </ol>	
Key products / services that the Company manufactures / provides (as in balance sheet)	<ol style="list-style-type: none"> <li>1. Mobile Services</li> <li>2. Airtel Business</li> <li>3. Tower Infrastructure Services</li> <li>4. Home Services</li> <li>5. Digital TV Services</li> </ol>	
Total number of locations where business activity is undertaken	Number of international locations (major 5)	Operations in 18 countries including India and Sri Lanka
	Number of national locations	Headquartered in New Delhi, the Company has business in all 22 licensed telecom service areas
Markets served by the Company – Local/State/ National/International	Besides India, operations in Africa and South Asia	

## Section B

### Financial Details of the Company

1. Paid up capital (₹ Mn)	27,278
2. Total turnover (₹ Mn)	543,171
3. Total profit / (loss) after taxes (₹ Mn)	(360,882)
4. Total spending on Corporate Social Responsibility (CSR) as percentage of average Net Profit of the Company for last 3 financial Years	N.A.*
5. List of activities in which expenditure in point (4 above) has been incurred	Education promotion Higher and technical education Employability enhancing vocation skills

\* In view of losses, percentage is not ascertained. However, the Company has made voluntary CSR contribution of ₹316.19 Mn during the fiscal year 2019-20.

## Section C

### Other Details

#### 1. Does the Company have any Subsidiary Company/ Companies?

Bharti Airtel Limited (hereinafter referred as Airtel) has 101 direct and indirect subsidiary companies, as on March 31, 2020.

#### 2. Does the Subsidiary Company / Companies participate in the Business Responsibility (BR) initiatives of the parent company?

Nearly all subsidiary companies, either directly themselves or jointly with Airtel, participate in the BR initiatives.

#### 3. Do any other entity / entities (e.g. suppliers and distributors, among others) that the Company does business with participate in the BR initiatives of the Company?

Airtel supports and encourages its partners to undertake sustainability and CSR initiatives. At present, Airtel's infrastructure and facility management partners support its drive towards environment protection, which represents less than 30% of all its partners.

## Section D

### Business Responsibility Information

#### 1. Details of Director / Directors responsible for BR

##### (A) Details of Director / Directors responsible for the implementation of BR policy / policies

DIN Number	00042494
Name	Mr. Rakesh Bharti Mittal
Designation	Director

##### (B) Details of the BR head

DIN Number	N.A.
Name	Mr. Sameer Chugh
Designation	Group General Counsel
Telephone Number	+91 114 6666100
E-mail ID	sustainability@airtel.com

#### 2. Principle-wise (as per NVGs) BR Policy / Policies

##### Principle 1

##### Ethics, Transparency and Accountability:

Businesses should conduct and govern themselves with ethics, transparency and accountability.

##### Principle 2

##### Products Lifecycle Sustainability:

Businesses should provide goods and services that are safe and contribute to sustainability throughout their life.

##### Principle 3

##### Employees' Well-being:

Businesses should promote the well-being of all employees.

##### Principle 4

##### Stakeholder Engagement:

Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalised.

##### Principle 5

##### Human Rights:

Businesses should respect and promote human rights.

##### Principle 6

##### Protection of the Environment:

Businesses should respect, protect and make efforts to restore the environment.

##### Principle 7

##### Responsible Policy Advocacy:

Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner.

##### Principle 8

##### Support Inclusive Growth:

Businesses should support inclusive growth and equitable development.

##### Principle 9

##### Providing Customer Value:

Businesses should engage with and provide value to their customers and consumers in a responsible manner.

## Details of Compliance (Reply in Y/N)

Sr. No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1.	Do you have a policy / policies for...?	Y	Y	Y	Y	Y	Y	Y	Y	Y
2.	Has the policy been formulated in consultation with the relevant stakeholders? (A)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3.	Does the policy conform to any national / international standards? If yes, specify? (50 words) (A)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4.	Has the policy being approved by the Board? If yes, has it been signed by MD / Owner / CEO / appropriate Board Director? (B)	Y	N	N	Y	N	Y	N	N	N
5.	Does the Company have a specified committee of the Board/ Director / Official to oversee the implementation of the policy? (B)	Y	Y	Y	Y	Y	Y	Y	Y	Y
6.	Indicate the link for the policy to be viewed online? (C)	Y	N	N	Y	Y	Y	N	N	N
7.	Has the policy been formally communicated to all relevant internal and external stakeholders? (D)	Y	Y	Y	Y	Y	Y	Y	Y	Y
8.	Does the Company have in-house structure to implement the policy / policies? (E)	Y	Y	Y	Y	Y	Y	Y	Y	Y
9.	Does the Company have a grievance redress mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies? (F)	Y	-	Y	Y	Y	-	-	-	Y
10.	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency? (G)	Y	Y	Y	N	N	Y	Y	N	Y

A) The policies are formulated through detailed consultation with relevant stakeholders and benchmarking across the industry. These are developed and aligned to applicable legal and regulatory requirements and guidelines, SEBI listing regulations and its internal mandates.

(B) All policies are administered under the overall supervision of the Airtel Management Board (AMB) of the Company, headed by the Managing Director and Chief Executive Officer. The Audit Committee of the Board along with other Board Committees regularly reviews implementation of policies.

(C) The following policies can be viewed on its website [www.airtel.com](http://www.airtel.com) and [www.bharti.com](http://www.bharti.com)

1. Code of Conduct Policy
2. Code of Conduct Policy for Partners
3. CSR Policy
4. Ombudsperson Policy and Process
5. Stakeholder Engagement Framework
6. Human Rights Policy
7. Environment Health and Safety Policy

(D) Except policies listed above, all other policies are meant for internal consumption of employees and are available on the Company's intranet. All policies have been

periodically communicated to the relevant internal and external stakeholders.

(E) All policies are owned by the respective AMB member and their senior leadership teams are responsible for the effective implementation of the policies.

(F) Any clarifications for grievances related to either of the policies are addressed by the respective leadership audit team member and if not addressed to satisfaction, can be escalated to the Ombudsperson.

(G) All policies and their implementation are audited by an independent internal audit team who in turn reports issues, if any, to the Board / Audit Committee.

#### Governance related to BR

**1. Performance assessment frequency of BR:** The CSR Committee and Board assess and review the BR performance annually and give a strategic direction to Airtel's BR initiatives, as required.

**2. Details of BR and Sustainability Report:** Airtel publishes an annual Integrated Report in accordance with the International <IR> Framework as developed by IIRC. The report has been uploaded on Airtel's website and can be viewed at [www.airtel.in](http://www.airtel.in).

## Section

## E

## Principle Wise Performance\*

## Principle

## 1

## Ethics, Transparency and Accountability:

Airtel believes that a strong and robust foundation of ethics and responsibility is absolutely necessary to sustain economic value. With its legacy of fair, transparent and ethical governance practices, the Company's Code of Business Conduct reinforces its commitment to operate with the highest degree of integrity. It lays a framework for expected standards of ethical conduct and behaviour, extending to employees and other individuals working with the Company. It outlines principles against discrimination, anti-competitive practices, insider trading and prohibits bribes, kickbacks and improper payments. It remains applicable to subsidiaries, suppliers, contractors, service providers and channel partners as well. Employees are also required to undergo an annual e-certification on the Code of Conduct to acknowledge their understanding of the same and to commit to inculcate the principles defined in it.

To avoid any conflict of interest, the Company has placed necessary safeguards as part of its corporate governance structure and the Code of Conduct.

To ensure effective implementation of its Code of Conduct, Airtel's Ombudsman policy allows employees, contractors and vendors to raise a complaint without any fear of reprisal. The Company undertakes a formal procedure to address and investigate such concerns and takes suitable action in accordance with the Consequence Management Policy. Such misconduct is periodically reported to the Audit Committee. In FY 2019-20, 29 allegations of corruption and bribery were received, and investigations were completed in 13 cases. The remaining 16 cases are under various stages of investigation. Allegations were substantiated in 5 cases and suitable actions were initiated as per the Consequence Management Policy, which led to the separation of the involved employees from the organization.

## Principle

## 2

## Product Lifecycle Sustainability:

The Company constantly aims to ensure safety and optimal resource utilization across the entire life cycle of its products, from design to disposal. Airtel proactively aims to reduce its ecological footprint across the value chain including its business operations, supply chain and delivery of services, to contribute towards sustainable development.

The Company is providing basic life services through its existing products and offerings including Mobile, DTH, Payments Bank, Fixed line and Broadband and Enterprise solutions. It has undertaken initiatives to enhance financial

inclusion, health and education along with raising awareness around agriculture. To minimise adverse environmental impact, the Company has undertaken several initiatives across the value chain. This includes initiatives around reduced energy consumption, waste minimisation and innovative solutions to ensure environmental sustainability. In keeping with its objectives, the Company has formulated and implemented procurement guidelines to ensure adherence to a set of ESG (environmental, social and governance) standards by its suppliers. It calls for compliance to energy, resource and water conservation, waste minimisation, employee health and safety, prohibition of child labour, adherence to local labour laws and respecting human rights. Airtel also adheres to existing regulations around procedures for waste disposal and gives primary importance to community health and safety.

Airtel acknowledges the growing concern over exposure to electromagnetic fields (EMF) and maintains complete transparency in its position. To allay any concerns, it shares extensive research-based information on this matter with its employees, partners, customers and the community at large. As per DoT guidelines, the Company's operational sites are subject to random selection and audit by the DoT's Telecom Enforcement Resource and Monitoring (TERM) Cells. In FY 2019-20, over 99% of the base stations audited by DoT on a sample basis, were found to be compliant with the emission norms. Moreover, to build awareness around the issue, the Company in partnership with the Cellular Operators Association of India (COAI) conducts numerous programmes, workshops and seminars.

As a business priority, Airtel declared a 'War on Waste' where the initiative intends to improve the Company's operating efficiency by eliminating waste. The Company is undertaking measures to optimize resources and reduce waste generation in its operations. More details on waste management can be found in the Natural Capital section of the Integrated Report.

Owing to its nature of business, e-waste is the most substantial waste generated by the Company. It has adopted a focused approach on e-waste management as a part of its continual efforts to reduce the ecological impact of its operations. Airtel, therefore, not only endeavours to minimise waste but, also ensures its proper disposal and recycling. The Company is also generating awareness around promoting the extended use of network and IT based equipment to reduce waste. It also adheres to the Government of India's (GoI) guidelines to recycle waste at source, which is carried out through authorised recycling partners. Details around the same can be found in the Natural Capital Section of the Integrated Report.

Airtel leverages its extensive platforms to serve a wide customer base and therefore, constantly strives to ensure that it does not have any adverse environmental or social impact through its sourcing, production or distribution activities. Further, the Company is dedicated to building a responsive and sustainable value chain, that ensures conservation of natural resources, as well as community safety and well-being.

\*The data reported under the Principles in Business Responsibility Report, covers information from India operations excluding Bharti Infratel Limited and Airtel Payments Bank Limited, except for Principle 8

### Principle 3

#### Employees' Well-being:

Airtel strives to foster a culture that supports each employee to realize their highest potential. The Company believes its employees are its key assets and are crucial for sustained business growth. It strives to create an environment where employees can continually enhance their knowledge, skills and expertise. Moreover, it encourages well-being programs to keep the workforce engaged and productive. Promoting a safe and empowered workplace with a culture that emphasizes equal opportunity, non-discrimination, meritocracy and freedom of expression is paramount to the Company. This serves to ensure that the Company's strong workforce of 14,485 employees are both efficient and engaged. It has also become the cornerstone of attracting and retaining the best talent.

The Company aims to build an inclusive organisation where diversity is celebrated. It strongly believes that employees from diverse backgrounds bring unique perspectives, experience, knowledge and skills, which when properly harnessed, can significantly increase the Company's ability to proactively respond to a dynamically changing business environment. During the year under review, there were 1,288 permanent women employees, representing around 8.89 % of the total workforce, while 10.8 % of the management workforce comprised of women. Besides, a total of 26 people with special abilities were also employed at various Company locations.

The Company had 61,164 contractual employees in FY 2019-20. In the reporting period, Company did not engage any temporary or casual staff. Employees at Airtel have the full freedom to become members of any trade union or indulge in collective bargaining. However, as on March 31, 2020, none of the employees of Bharti Airtel Limited were part of any independent trade union or collective bargaining agreements. The Company provides full freedom to its employees to escalate their grievances to the management without fear of repercussion and issues are immediately addressed and resolved to mutual satisfaction.

Airtel aims to incorporate initiatives that revolve around the philosophy of building a learning culture for employees throughout their employment with the Company. As a responsible and employee-oriented organization, the Company provides employees opportunities to enhance their behavioural, functional and technical competencies through various interventions like on-the-job exposure, projects, coaching, mentoring and classroom trainings. An average of 7.07 hours of training was provided per employee in FY 2019-20.

Airtel's stringent workplace health and safety policies are driven by its commitment to ensure health and safety for all its employees. It provides a comprehensive framework for ensuring a safe and incidence-free workplace, effective investment in health promotion and disease prevention at all levels of the business. A dedicated safety team, led by a Safety officer, was set up to ensure occupational health and safety across operations. In FY 2019-20, 14,963 employees attended the safety trainings including 25 specially abled employees.

Additionally, various employee-friendly policies allow the employees to valuably contribute to the Company while maintaining work-life balance. Flexible work hours, work from home arrangements, maternity and paternity leave more than that mandated by law, helps to promote employee well-being. The Company also organises regular medical check-ups, fitness challenges and awareness programmes on maintaining a healthy lifestyle.

Airtel also promotes policies to safeguard the security and well-being of its employees through its Workplace Safety Policy, Domestic Travel Safety and Security Policy, and Policy for Safety of Women. In the previous reporting year, we had launched an app for Women Safety. It was designed to enable them to reach out to a family member or friend who could help them in an emergency, through real-time location tracking. Further, to ensure a safe workplace free from any sexual harassment, the Company has put stringent procedures in place to prevent and address such issues.

The Bharti Code of Conduct strives to build a workplace culture that is an appropriate reflection of Bharti's values of trust, mutual respect and inclusive growth for all. Within its purview, a wide array of issues pertaining to harassment, workplace conduct, labour conditions, and community responsibility are covered, which are dealt in line with our Consequent Management Policy. In FY 2019-20, 10 cases regarding sexual harassment at the workplace were reported and investigated. Allegations were substantiated in 9 of these cases, and the accused personnel were separated from their association with Airtel i.e. their services were terminated. No complaints regarding child labour, forced labour and discriminatory employment were received during the year under review.

### Principle 4

#### Stakeholder Engagement:

Airtel believes in creating value for each stakeholder. Accordingly, the Company assesses the impact of its business activities on its stakeholders and takes necessary actions to engage with them, understand their concerns and meet their expectations. Airtel realizes that coping with multiple and competing stakeholder interests calls for a strategic approach wherein the right stakeholders are identified and apprised with relevant information through suitable engagement channels. It also has a Stakeholder Engagement Framework which is applicable to all operating entities and functions at a corporate and regional level, guiding its activities towards effective stakeholder engagement.

Regular engagement with internal as well as external stakeholders allows the Company to stay apprised of any pressing concerns. It helps the Company to prioritize key sustainability issues in terms of relevance to its business and stakeholders, including society and the environment. The Company also conducts a detailed materiality-assessment, enabling it to map stakeholder expectations along with its business priorities, risks and opportunities.

Every two years, Airtel conducts a materiality assessment exercise to re-evaluate the material topics, which guide its corporate sustainability strategy. A comprehensive exercise was undertaken in FY 2017-18 through extensive stakeholder surveys to understand the expectations of internal as well as external stakeholders and identify materiality topics / sustainability concerns with the highest relevance and impact. As per this exercise, key stakeholders identified included: Customers, Employees, Business Partners (Suppliers and Vendors), Community, Investors, Government Bodies, Industry Associations, Non-governmental Organizations (NGOs) and Academic Institutions. Stakeholder engagement activities were carried out with the help of questionnaires. Similar exercise was performed with the Airtel Management Board to delineate business priorities, which when mapped with stakeholder concerns, helped in identifying the sustainability issues that demanded enhanced strategic and operational attention.

Through Bharti Foundation, the philanthropic arm of Bharti Enterprises, the Company has identified disadvantaged, vulnerable and marginalised stakeholders. Economically weak and disadvantaged groups, especially girls, are the targeted beneficiaries of the Company's CSR activities. Bharti Foundation touches all aspects of stakeholder empowerment through multiple community initiatives in the realm of education, employment generation and sanitation. Further information on Company's CSR interventions can be found in the CSR section of the Annual Report.

There are several channels through which the Company connects with its stakeholders and provides them the opportunity to share feedback or report grievances. The primary channel is its call centers - an independently managed hotline accessible to all stakeholders including customers, community members, partners and government authorities to raise any complaints / issues, which are then appropriately addressed.

## Principle 5

### Human Rights:

The Company's core priorities include respecting human rights of each and every stakeholder, across the value chain. As a responsible organization, it aims to limit adverse impacts of its business activities on internal and external stakeholders including employees, suppliers, partners, customers and the wider community.

Airtel's commitment to human rights is reinforced through its Code of Conduct (COC) and Human Rights Policy. The Company complies to all local labour laws and regulations applicable in each operating location. The Company's Human Rights policy is applicable to all employees across the organization, while the COC for business associates and Vendor Compliance Policy details the requirements for partners and suppliers to uphold and respect human rights. Compliance to the Code, the relevant labour laws and human rights regulations applicable in their geographies of operation is a major part of associating with Airtel.

The Company has established committees / processes such as the Ombudsman process, Prevention of Sexual Harassment Committee, Audit / Risk committees to review progress and formulate strategies to address material issues pertaining to compliance, employee well-being and safety, and ensuring a harassment-free workplace. The employees are constantly informed about these processes to provide a medium for them to report any grievances.

## Principle 6

### Protection of the Environment:

The carbon footprint of the telecom industry is likely to increase as developing markets continue to grow, network traffic increases, and companies move towards 5G. Airtel is conscious about the impact of its operations on the environment and is taking pre-emptive measures to address this through an extensive range of initiatives aimed at increasing the use of renewable energy sources and optimising energy consumption to move towards cleaner operations and energy efficient networks.

The Company is committed to operate and deliver products and services in an environmentally responsible and sustainable manner. Its Environment, Health and Safety (EHS) Policy specifies the approach towards protection of the environment; and is applicable for all employees of the Company and its subsidiaries.

Airtel has undertaken various initiatives towards emission reduction including the deployment of renewable energy solutions in network towers, installation of rooftop solar panels at Main Switching Centres (MSCs) and captive green energy generation through solar/wind energy during the year under review. It has also entered into Open Access contracts for procuring power through renewable energy sources, to further reduce emissions.

To enhance its environmental performance, the Company implemented ISO 14001:2015 Environment Management System at all its data centres. Additionally, other initiatives like deployment of shared sites, conversion of indoor base transceiver stations to outdoor and implementation of solar hybrid solutions have been undertaken in collaboration with its network infrastructure partners. To reduce energy consumption in Airtel's facilities, the Company has deployed energy efficient equipment, initiated facility consolidation, undertaken optimum space utilisation and excess demand surrender. These initiatives have significantly curtailed its diesel and electricity consumption, contributing to the promotion of a low carbon economy.

Airtel's greatest contribution in adapting to climate change comes from increased digitalisation initiatives, supported by a network that runs on green energy and solutions that are already responding to environmental challenges. It not only enables customers to reduce their carbon footprint but is also contributing to increase the resilience of communities in which it operates. For instance, its IoT and B2B services are designed to improve customer mobility and energy efficiency; and its

cloud and video-conferencing services prevent greenhouse gas emissions through reduction of fuel usage. The energy efficient data centers are also significantly avoiding carbon emissions by hosting IT applications for other parties.

To reduce resource consumption and transition to more sustainable production, Airtel is taking concrete steps through measures such as recycling of paper and E-waste, introduction of e-bills, take-back and refurbishing of DTH set top boxes, and tower sharing to save resources like steel, cement, concrete, zinc and land. During the reporting year, emissions and waste generated by the Company were within permissible limits set by the Central Pollution Control Board (CPCB) and State Pollution Control Boards (SPCBs). As on March 31, 2020, there were no notices / cases received by the organization from pollution control boards.

Further details of the Company's environmental initiatives are available in the Natural Capital section of this report.

## Principle 7

### Responsible Policy Advocacy:

As one of India's largest Telecommunication operators, Airtel assumes significant responsibility to contribute to the development of public policy, which will facilitate the transition to a more sustainable and equitable world. Airtel works closely with all industry associations and trade chambers to ensure that its public policy positions complement and advance its objectives of social and environmental stewardship.

The Company also strives to shape policy that drives digital inclusion, advances innovation, enhances competitiveness, promotes green telecom, and spurs economic growth to increase job opportunities. Its policy agenda focuses on promoting last mile connectivity of network, affordable access to customers, digital literacy and transparency and awareness around EMF radiations.

Moreover, it deals with creating adaptability of internet, easing and automating subscriber acquisition, enhancing the quality of service offerings, tariff regulations and environment protection among others. As these issues continue to be thoroughly scrutinised and deliberated upon by government bodies, they are likely to have a material impact on the lives of millions.

The Company's policy positions are generally conveyed through its membership with the Cellular Operators Association of India (COAI). Airtel is also a member of apex industry bodies engaged in policy advocacy such as the Confederation of Indian Industry (CII) and Federation of Indian Chambers of Commerce and Industry (FICCI). Internationally, Airtel is a member of the International Telecommunication Union (ITU) and GSM Association (GSMA).

Airtel tries to influence policies that are in the best interest of its customers and the community at large. With an objective to balance the interests of diverse stakeholders, it operates with the highest values of ethics, integrity, transparency and accountability in all its advocacy endeavours.

## Principle 8

### Support Inclusive Growth:

The Company considers organisational success and welfare of communities as inter-dependent. It understands the importance of inclusive growth for developing the economy as a whole, so that the Company's services can be accessed by all its customers, including those at the Bottom of the Pyramid (BoP). Airtel is cognisant of this responsibility and has been taking continued efforts to ensure value creation and sustainable growth of communities.

Through its exhaustive suite of innovative services and products that help enhance the quality of lives, Airtel has played a role in empowering millions across the country. This has been possible through continued engagement with communities and relentless efforts to expand the reach of its network. Furthermore, Airtel is leveraging the power of Information and Communication Technology (ICT) to drive development in rural communities through special products for rural customers, based on health, education, financial inclusion and agriculture. For instance, through its IFFCO Kisan Sanchar Limited (IKSL) mobile app, Airtel has empowered nearly four million farmers to improve their productivity and income by enhancing their knowledge on commodity prices, weather, agronomy, horticulture and government schemes.

Since internet accessibility can play a vital role in enhancing the socio-economic well-being of a society, Airtel is proactively supporting the Indian government's flagship 'Digital India' initiative, in pursuit of digital inclusion of rural population and ensuring last mile connectivity. Therefore, Airtel is striving to expand its services in the rural markets.

Airtel is actively engaged in philanthropic activities and encourages its employees to volunteer for social causes and community outreach programs. This reflects its desire to be a trusted partner for holistic development of the communities that it operates in. Spearheaded by Bharti Foundation, these initiatives are also supported through its own telecom circle offices at the regional level. Through Bharti Foundation, the Company implements and supports programs in the fields of primary, secondary and higher education as well as sanitation.

The flagship program of Bharti Foundation, Satya Bharti School Program, involves communities in the operation of schools. It aims to provide a platform for rural children to access quality education and paves the way to help them lead responsible lives that are inspired by the principles of commitment, integrity and a desire to make a difference.

Amidst the recent COVID-19 outbreak, Bharti Foundation supported teachers to continuously engage and reach out to students as well as parents, to carry out educational endeavours during the countrywide lockdown. The Foundation also worked with government schools to initiate programs that enabled the use of technology for teaching.

Further details about the initiatives undertaken by Bharti Foundation and by Airtel's regional circle offices are available in the CSR section of the Company's Annual Report.

During FY 2019-20, Airtel made significant contributions towards various philanthropic projects, including:

**₹ 2.15 Mn**

To Bharti Foundation towards furtherance of its objectives

**₹ 316.19 Mn**

Other contributions



#### Principle 9: Providing Customer Value:

Customers are pivotal to Airtel's success and it believes in providing best-in-class telecommunication products and services to them. One of the key themes and business priorities for the Company is 'Win with Customers'. Through its world-class network, innovative yet affordable services and an exceptional customer experience, the Company aims to win customers for life. The Company's business goal is to innovate and deliver a wide range of cost-effective, secure, timely, and customized services with best-in-class technology. Over the last few years, the Company has been striving to improve its network quality through increased investment to strengthen its network infrastructure and to enhance spectrum efficiency.

At the heart of Airtel lies innovation. Every year, the Company comes up with innovative products and services, leveraging latest technologies, strong R&D, and effective collaborations to create an advanced solution for its customers. From enabling customers through digitalization and self-care and facilitating convenience by providing affordable and value-added ICT solutions, the Company endeavours to constantly innovate in every aspect of its operations. Apart from telecom, Airtel also provides innovative technology solutions based on basic life services such as health, education, financial inclusion and agriculture.

At Airtel, its customers are also its business partners, helping to greatly improve and evolve the services it offers. Their ongoing feedback and inputs provide the greatest stimulus to improve its products, services and processes. Through an integrated end-to-end experience, improvement of overall retail store experience and impeccable voice and internet services, the Company strives to enhance customer experience and increase customer retention. The Company has a dedicated Customer Experience team that actively seeks and responds to customer feedback and queries so as to be able to continuously improve upon its products, services and processes. Measuring customer satisfaction and loyalty is a key consideration for the Company. To do this, Airtel employs multiple tools such as the Net Promoter Score

(NPS), social media mentions, and feedback over call/ point of sale, customer grievances, complaint management and exit surveys. Holistic tools such as the NPS enable it to gather feedback and capture customers' perceptions.

Airtel empowers its users by offering transparency in services, enabling them to manage their own Airtel products & services with ease. Airtel has consistently made efforts in this direction through its Open Network Initiative and enriched self-care through the powerful MyAirtel App, which was revamped to airtelThanks app in the reporting year. In the past few years, Airtel has successfully implemented various initiatives to increase transparency for its customers and/or reduce the surprises arising due to bill shock during international roaming and lack of awareness about services. Airtel has been communicating mandatory usage information (as specified by the law) regarding enrolment and deactivation, tariff, usage, contact and grievance on its welcome kits, periodic bills, enrolment forms, booklets, websites and point of sale displays.

Airtel works closely with the industry, government, law enforcement agencies and community organizations to help customers understand and manage the risks associated with the online world. To this effect, Airtel supports a range of government initiatives to raise awareness, and provides online education and guidance. Some of the measures undertaken in the last few years include:

1. Proactively filtering offensive content available online, which is not compliant with the state laws.
2. Constantly upgrading technology to reduce threat exposures.
3. Associating with Law Enforcement Agencies (LEA) to support investigations by providing customer information and complying with all requests as per regulatory norms.

In addition to this, Airtel also takes prior consent of all customers at the time of acquisition on collection, transfer and disclosure of personal data, details of which can be found in our privacy policy (<https://www.airtel.in/former/privacy-policy>). All subscribers have an option to opt out of usage of customer information for promotional purposes and they can readily opt out at any time through our website/application, at customer acquisition stage or through a single SMS.

In FY 2019-20, no cases have been filed against the company before the Competition Commission of India for anti-competitive behaviour and no cases were pending resolution as on March 31, 2020. However, 2 complaints were filed against the Company before ASCI (Advertising Standards Council of India) in the reporting period and both have been resolved successfully.

# INDEPENDENT ASSURANCE STATEMENT ON SUSTAINABILITY DISCLOSURES

To

**Bharti Airtel Limited**

Bharti Crescent,1, Nelson Mandela Road

Vasant Kunj Phase II

New Delhi 110070, India

## Independent Assurance Statement on sustainability disclosures in the Integrated Report and Annual Financial Statements 2019-20

### Introduction and objective of engagement

Thinkthrough Consulting Private Limited (TTC) was engaged by Bharti Airtel Limited (the 'Company') to provide independent assurance on its sustainability disclosures in the Integrated Report and Annual Financial Statements 2019-20 (the 'Report') that includes the Company's sustainability performance for the period 1st April 2019 to 31st March 2020.

The Company has developed its Report based on the applicable accounting standards and has incorporated the principles of the Integrated Reporting (<IR>) Framework published by the International Integrated Reporting Council (IIRC). Its sustainability performance reporting criteria has been derived from Business Responsibility Reporting Framework based on the principles of National Voluntary Guidelines of India (NVG), and Accountability's AA1000APS 2008 (Principles of Inclusivity, Materiality and Responsiveness).

### Respective responsibilities

The Report content and its presentation are the sole responsibilities of the management of the Company. The Company management is also responsible for the design, implementation and maintenance of internal controls relevant to the preparation of the Report, so that it is free from material misstatement.

TTC's responsibility, as agreed with the management of the Company, is to provide assurance on the Report content as described in the 'Scope of assurance and methodology' section below. We do not accept or assume any responsibility for any other purpose or to any other person or organisation. Any reliance a third party may place on the Report is entirely at its own risk.

### Assurance standard

The assurance process was conducted in line with the requirements of the AA1000 Assurance Standard (2008) Type 2 assurance<sup>1</sup>. We applied a moderate<sup>2</sup> level of assurance.

### Scope of assurance and methodology

The scope of assurance engagement was limited to review of sustainability data and information in the Report, pertaining to environmental and social performance for the period 1st April 2019 to 31st March 2020. The sustainability disclosures covered in our sample review included: Energy; Waste; GHG (carbon) emissions and intensity; Employee training and education.

We conducted review and verification of data collection, collation and calculation methodologies and general review of the logic of inclusion/ omission of relevant information/ data in the Report. Our review was limited to:

- ≡ Evaluating the appropriateness of the quantification methods used to arrive at the sustainability disclosures presented in the Report;
- ≡ Review of consistency of data/information within the report as well as between the report and source;
- ≡ Execution of an audit trail of claims and data streams, on selective basis, to determine the level of accuracy in collection, transcription and aggregation;
- ≡ Review of sustainability data collection and management procedures.

### Limitations of our engagement

The assurance scope excludes:

- ≡ Data and information outside the defined reporting period (1st April 2019 to 31st March 2020);
- ≡ Review of the 'economic performance indicators' included in the Report which, we have been informed by the Company, are derived from the Company's audited financial records;
- ≡ The Company's statements that describe expression of opinion, belief, inference, aspiration, expectation, aim or future intention.

*Due to the outbreak of the COVID-19 pandemic, and the resultant travel and meeting restrictions, data assurance was*

<sup>1</sup> Type 2 Assurance: an engagement in which the assurance provider gives findings and conclusions on the principles of Inclusivity, Materiality and Responsiveness, and verifies the reliability of specified sustainability performance information AA1000AS (2008) Standard.

<sup>2</sup> A moderate level of assurance as per AA1000AS (2008) Standard is commensurate with "limited" assurance as defined in the International Standard on Assurance Engagements (ISAE) 3000

*done through remote assessments using appropriate web-enabled tools. We did not conduct any physical verification at locations or offices of the Company. Audit trails and review were conducted through remote discussion with officials of the Company, and gathering of evidences on sample basis.*

### **Our assurance team and independence**

TTC is a professional services firm that specializes in accountability on sustainability issues. The assurance was performed by our multi-disciplinary competent team of experts across domains of sustainability as well as global sustainability reporting standards and AA1000 Assurance Standard. This team has extensive experience in conducting independent assurance of sustainability data, systems and processes across sectors and geographies. We have implemented measures to ensure that we follow the applicable independence procedures.

### **Our observations**

While the sustainability disclosures of the Company as defined under the scope of assurance are fairly reliable, the Company has a scope to augment the robustness of its data management system, including internal review mechanism, to further enhance the accuracy of reporting.

### **Our conclusion**

Based on the scope of our review, our conclusions are outlined below:

- ≡ Inclusivity: We are not aware of any matter that would lead us to conclude that the Company has not applied the principle of inclusivity in engaging with the key stakeholder groups;
- ≡ Materiality: Nothing has come to our attention that causes us to believe that any material topic has been excluded from the Report;
- ≡ Responsiveness: Nothing has come to our attention that would lead us to conclude that the Company has not applied the principle of responsiveness for communicating with stakeholders on material topics covering its sustainability performance.



**Dipankar Ghosh, Partner**

New Delhi

20 July 2020