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## MESSAGE FROM OUR CEO

Data center industry is entering a phase of unprecedented growth – and Nxtra is proud to be at the forefront of this transformation. In a world increasingly shaped by digital experiences, the infrastructure that powers this future must also be built on the pillars of environmental stewardship, resilience, and innovation. As one of the fastest-growing data center operators in the country, we recognise that with scale comes responsibility.

At Nxtra, we see sustainability not as an option – it is embedded into the very core of how we design, build, and operate. We are reimagining what data centers can be: intelligent, scalable, and sustainable by default – ensuring our progress contributes positively to the environment and society.

As Al, cloud, and digital connectivity redefine the way we live and work, we believe that the infrastructure supporting this shift must be future-ready in every sense – technologically, operationally, and environmentally. We are proud to share our progress and reaffirm our commitment to creating a digital ecosystem that scales with purpose and leads with responsibility.

Progress for us is not just measured in megawatts saved or emissions avoided. It is measured in the resilience we build into our infrastructure, the trust we earn from our stakeholders, and the ripple effect we create across our supply chain. We are committed

to harnessing Al, automation, and advanced analytics to rethink efficiency, drive circularity, and empower our teams and partners to be catalysts of change.

This year's sustainability report reflects the progress we have made – but more importantly, the intent that drives us forward. Across every new data center facility, every design blueprint, and every partnership, we are integrating responsible practices that meet the expectations of our customers and the needs of our planet.

#### **Advancing Our Commitments**

In line with our strategic sustainability objectives, I am pleased to share key performance metrics and landmark initiatives that demonstrate our progress toward enhancing our sustainability index. The following highlights capture some of our most significant achievements from the past year, reflecting the dedication of our teams and partners in advancing our shared vision.

#### **Environment**

Our environmental stewardship is rooted in decisive action. From integrating renewable energy at scale to enhancing resource efficiency across our operations, we are taking deliberate steps to decouple growth from environmental impact and accelerate the transition to a low-carbon future.



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True progress is when our growth leaves a lighter footprint on the environment, creates lasting value for people and communities, and is guided by the highest standards of governance. That is the impact we want Nxtra to be known for.

#### Some of our key achievements include:

- Contracted 482,800 megawatt-hours (MWh) of renewable energy across 9 states, just over triple increase since 2021
- Reduced Scope 2 emissions by 9% compared to FY21, despite 26% increase in the electricity use.
- Delivering on our commitment of 10% reduction in Avg. PUE compared to FY21 baseline.
- Recycled 15,329 KL of water through advanced sewage treatment systems at core facilities.
- Diverted 1,411 tonnes of waste from landfills through recycling initiatives.

#### Social

We recognise that true progress is measured by the positive change it brings to people's lives. Through our social initiatives, we are fostering inclusion, empowering communities, and enhancing the well-being of all those connected to our ecosystem.

#### Some of our key achievements include:

 Set new safety benchmarks with a TRIR of 0.01, zero fatalities, and 6.15 million safe man-hours in construction, driven by a robust health and safety programme reinforced through a three-tier audit assurance system.

- Empowered diversity with a 2.3x increase in women's representation across the workforce.
- Fostered workplace trusts by achieving an employee engagement score of 85/100.
- Expanded social impact with an 8.8% increase in CSR investments, supporting education for underprivileged students in rural communities.

#### Governance

Strong governance remains the bedrock of our long-term success. By embedding transparency, ethical conduct, and accountability into every decision, we are building enduring trust and ensuring that our growth is both responsible and resilient

#### Some of our key achievements include:

- 85.71% of our Board comprises independent Non-Executive Directors, ensuring robust governance and unbiased decision-making.
- 100% of stakeholders successfully completed annual certification on the Code of Business Conduct, reinforcing a culture of integrity.
- 99% of our suppliers are India-based, strengthening local economies and fostering resilient supply chains.
- 98% of strategic suppliers underwent ESG assessments, driving sustainability across the value chain.

 Zero information security breaches, with PCI DSS, SOC 1 & SOC 2 Type II (including SSAE) maintained across all core data centers.

We will continue to challenge ourselves to act faster, collaborate wider, and think bolder – because a sustainable digital future is not a distant goal; it is the standard we choose to set today.

We extend our heartfelt appreciation to our customers, suppliers, partners, communities, and colleagues whose trust and collaboration fuel our purpose. The path to realising our sustainability ambitions may be complex, but it is also filled with possibility. Together, we are not just moving toward a sustainable future – we are reimagining what is possible for India and the world, creating transformative impact that will resonate for generations to come.

Regards,

Ashish Arora

#### **Ashish Arora**

Whole-time Director and Chief Executive Officer (CEO)



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## ABOUT THE REPORT

GRI 2-2, 2-3, 2-4, 2-5, 2-6

#### **INTRODUCTION**

With a strong commitment to transparency and responsible growth, we present our Sustainability Report for FY25. This report provides a clear and comprehensive view of how we are integrating sustainability, strategy, and performance into our core operations across economic, environmental, social, and governance areas. It reflects our ongoing commitment to openness, accountability, and long-term value creation through meaningful and measurable action for all stakeholders. By highlighting these efforts, we aim to drive our ongoing progress and foster greater collaboration within the industry.

#### APPROACH TO REPORTING

The report presents our annual sustainability performance, highlighting our overarching sustainability strategy, Key Performance Indicators (KPIs) and stakeholder engagement framework. The report also reflects our commitment to transparent reporting practices and full compliance with evolving regulatory requirements. It also details our approach to identifying potential risks, including those related to climate change. Additionally, it showcases our continued efforts to empower communities through impactful Corporate Social Responsibility (CSR) initiatives.

#### REPORTING FRAMEWORKS AND STANDARDS

The data in this report has been captured with reference to the Global Reporting Initiative (GRI)

Standards 2021. The report also highlights our contributions to the United Nations Sustainable Development Goals (UN SDGs), while demonstrating our ongoing efforts to align with and track progress against the UN SDGs. A detailed index is provided at the end of this report to support transparency and ensure ease of access to our disclosures.

#### **SCOPE AND BOUNDARIES**

This report covers the operations and activities of Nxtra, including our corporate office, data center facilities across India. Material changes in the Company's size, structure, ownership, or supply chain during the reporting period have been covered in this report.

#### REPORTING PERIOD

The report covers our non-financial/ESG performance from April 1, 2024, to March 31, 2025. It covers our operations across India, offering an in-depth look at our initiatives and the value they create.

#### **RESPONSIBILITY STATEMENT**

We are committed to conducting business responsibly, placing the well-being of our employees, communities, and the environment at the forefront. We prioritise sustainability, safety, and ethical practices across all our operations. By embracing innovation and upholding the highest standards, we aim to generate long-term value for our stakeholders and make a positive contribution towards a sustainable future.

#### RESTATEMENT OF INFORMATION

We have made restatements in the report with respect to our emissions and energy data for the past five years to reflect recent refinements, reinforcing our commitment to transparency and accountability. In FY25, we adopted a refined emissions boundary to improve accuracy in GHG accounting, particularly for client-related energy use. Under specific contracts, emissions from electricity and diesel (IT and non-IT loads) are passed through to clients as Scope 2 and Scope 1, and excluded from Nxtra's boundary to avoid double counting. This approach was reviewed and agreed with client stakeholders. In addition, we have updated our Scope 3 inventory to align with best practice and ensure comprehensive coverage of value chain emissions. A new category - Purchased Goods and Services has been included, and data under the Capital Goods category has been refined accordingly. Furthermore, our baseline year for net zero commitments has been revised from FY21 to FY23. This change follows the submission of our near- and long-term targets to the Science Based Targets initiative (SBTi), which have since been validated. The updated baseline aligns our reporting with the approved SBTi framework and ensures consistency in tracking progress towards our decarbonisation goals.

#### **ASSURANCE**

The information in this report has been carefully examined, in accordance with internal review and control measures. In addition, it has been

independently audited by TUV Rheinland India Private Limited. The assurance was conducted in accordance with the ISO 14064:3-2019 standard and the AA1000 Version 3 (Moderate Type 2) assurance standard. The assurance statement from an independent agency is included at the end of this report.

#### FORWARD- LOOKING STATEMENT

The report includes forward-looking statements based on the Company's current understanding and historical performance. Such statements can be recognised by words like "beliefs", "estimates", "anticipates", "expects", "intends", "may", "will", "plans", and "outlook", as well as other words with similar meanings. These forward-looking statements contain known and unknown risks, uncertainties, and other factors that could affect the results differently from anticipated ones. Though the Company bases its present projections on reasonable assumptions, it makes no guarantees about the accuracy or precision of the forward-looking statements.

#### Feedback

We encourage stakeholders to share their valuable insights, feedback, and suggestions as part of our commitment to drive continuous improvement in meeting our sustainability goals. We also appreciate and encourage constructive feedback from our stakeholders. **Email - ESG@nxtra.in.** 



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## ABOUT THE COMPANY

GRI 2-1, 2-28

#### **COMPANY OVERVIEW**

Nxtra Data Limited (Nxtra), a wholly owned subsidiary of Bharti Airtel Limited, headquartered in New Delhi, is one of India's largest and fastest-growing data center providers, offering a secure, scalable, and sustainable platform for businesses to host their mission-critical applications. We operate an interconnected network of hyperscale, core, and edge data centers that enable industry verticals to design differentiated IT architectures tailored to their specific business needs, thereby enhancing user experiences.

Our state-of-the-art facilities are strategically located across 8 major markets and 66 unique cities, catering to both regional and national requirements within India's distributed, layered industrial ecosystem. Designed for long-term strategic scalability, our campuses offer vertical and horizontal expansion capabilities to house DCs, NDR, DR, AZs, PoPs and edge nodes.

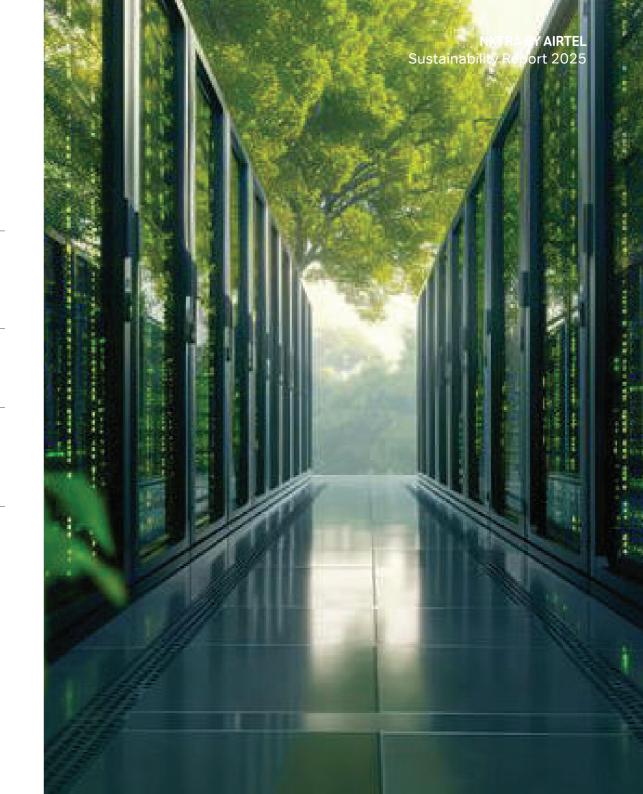
Leveraging Airtel's robust telecom backbone, Nxtra ensures georedundant fibre connectivity with dense domestic and global service PoPs onsite, delivering high data availability, reliability, and seamless exchange within these digital hubs. Our operations are backed by over 20 years of expertise in managing critical infrastructure, supported by trained professionals and Al-embedded tools that enable 24/7 monitoring and uninterrupted service delivery. With sustainability as a core priority, our data centers are significantly powered by renewable energy and designed to green building standards, reflecting our long-term commitment to environmental stewardship. As a key enabler of India's digital and Al ambitions, Nxtra is on track to expand its capacity from 220 MW to 450 MW in the next three years, hosting a diverse clientele that includes global and domestic enterprises, government and public sector undertakings, cloud and OTT platforms, internet service providers, and internet exchanges cementing our position as a leading converged ICT player in the market.

8 Major markets

14+
Hyperscaler/Core
Data Center

120+ Edge Data Centers

2X Power capacity in next 3 years





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### **VISION**

Shaping a future where technology meets responsibility. We design, build, and operate the largest network of smart, resilient, and sustainable data centers in India.

### MISSION

Our mission to build future-ready infrastructure is driven by two core principles: Intelligence and Sustainability.

## **VALUES THAT** DRIVE US

Visionary



Accountability



Scalability



Sustainability



Reliability

#### **ACTIVITIES (OPERATIONAL PORTFOLIO), VALUE CHAIN & OTHER BUSINESS RELATIONSHIPS**

#### **GRI 2-6**

Nxtra's value chain integrates upstream collaborations with infrastructure developers, technology vendors, and renewable energy providers, and downstream relationships with a wide spectrum of customers in the enterprise, government, public sector, cloud, and digital services domains. Our operations span 8 major markets and 65 cities, forming a connected ecosystem that supports critical workloads through colocation, network integration, disaster recovery, and edge services. The design and configuration of our sites enable flexible scaling to meet evolving digital demands, while Airtel's extensive connectivity backbone enhances data exchange and reliability. During the reporting period, we advanced our capacity expansion programme and deepened renewable energy integration, reinforcing our role in strengthening India's digital and AI infrastructure.

#### MEMBERSHIP OF ASSOCIATIONS

#### **GRI 2-28**

Nxtra plays an active role in shaping the data center and digital infrastructure industry through participation in key national and international associations. Represented through our parent company, Bharti Airtel Limited, we engage with leading industry bodies such as the Broadband India Forum (BIF), Federation of Indian Chambers of Commerce & Industry (FICCI), Cellular Operators Association of India (COAI), and the Associated Chambers of Commerce of India (ASSOCHAM), contributing to policy discussions on sustainability, connectivity, infrastructure expansion, and business continuity. On the global stage, we are a proud member of RE100, committed to transitioning to 100% renewable electricity, and a signatory to the United Nations Global Compact (UNGC), reinforcing our dedication to responsible business practices.





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## FY25 SUSTAINABILITY HIGHLIGHTS



#### ENVIRONMENTAL

- Reduced Scope 2 emissions by 9% compared to FY21, despite 26% increase in electricity use.
- Delivering on our commitment of 10% reduction in Avg. PUE compared to FY21 baseline.
- 49% of the total electricity consumed at core data centers was sourced from renewable energy sources.
- 15,329 KL of water recycled through advanced sewage treatment plants across our core data centers.
- 100% of battery, e-waste and other hazardous waste sold to government-authorized vendors.
- Aligned with ISSB standards by integrating TCFD-based climate scenario analysis into our enterprise risk framework.



#### SOCIAI

- 2.3x Increase in gender diversity compared to FY24
- Achieved Employee engagement score of 85/100
- Zero grievances filed related to sexual harassment, discrimination at workplace, child labour or any other human rights related issues
- 6,154,778 safe-man hours in construction
- Achieved TRIR of 0.01
- 8.8% increase in CSR expenditure



- 85.71% Non-Executive Directors
- 'Zero' complaints regarding conflict of interest
- 100% stakeholders attained annual certification on the Code of Business Conduct
- 99% India-based suppliers
- 98% strategic suppliers evaluated through digital assessment tool using ESG criteria
- 'Zero' breach of information security occurred
- Maintained PCI DSS, SOC 1 & SOC 2 Type II (including SSAE) for all of our core data centers
- Enhanced ESG ratings for customers through transparent and reliable ESG data sharing





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## STAKEHOLDER ENGAGEMENT

GRI 2-29, 201-3, 201-4

## APPROACH TO STAKEHOLDER ENGAGEMENT

At Nxtra, we recognise that meaningful and continuous stakeholder engagement is essential to achieve sustainable and long-term success. We are committed to cultivating strong relationships grounded in trust, transparency, and mutual respect.

Through regular interactions, we seek to understand stakeholder expectations, respond to their concerns, and ensure they are well-informed about significant developments within the organisation.

## STAKEHOLDER IDENTIFICATION & PRIORITISATION

According to the AA1000 Stakeholder Engagement Standard (AA1000SES), stakeholder identification and prioritisation involve a structured, inclusive approach that aligns with the principles of inclusivity, materiality, and responsiveness. Stakeholders are identified based on their impact on or influence by the organisation, using diverse sources to ensure broad representation, including marginalised groups. Prioritisation is then carried out by assessing factors such as the stakeholder's influence, dependency, the level of tension or alignment, the organisation's responsibilities toward them, and their representativeness. This ensures that engagement focusses on those most relevant to the organisation's sustainability context and strategic goals.

## IDENTIFICATION AND PRIORITISATION OF STAKEHOLDERS

○ 1 Review of Business Operations

O2 Identification of Relevant Stakeholder Groups

O3 Classifying Stakeholders into Defined Groups

O4 Determining Priority Stakeholders Within Each Category

#### STAKEHOLDER ENGAGEMENT PROCESS

We view stakeholder engagement as a strategic priority that drives our long-term success and sustainability. Our engagement framework is built on the core principles of transparency, mutual trust, inclusivity, and collaboration. By actively listening to our stakeholders and encouraging continuous, two-way dialogue, we ensure their voices are heard and reflected in our decision-making.

Through timely, transparent, and relevant communication, we aim to foster healthy conversations with all key stakeholder groups. This proactive approach allows us to anticipate and address expectations, concerns, and emerging risks effectively.

#### **POLICY OBJECTIVES**

- Finding stakeholder concerns and interests and framing of required policies and processes.
- In order to ensure quality communication and clarity, accessibility with relevance and timelines.
- We have stakeholder trust and confidence in processes, decisions and actions.

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#### **OUR STAKEHOLDERS**







Employees



Media



Regulators



Suppliers and Partners



Investors



Communities

|              | KEY ISSUES ADDRESSED   | MODE OF ENGAGEMENT  | FREQUENCY OF ENGAGEMENT     |
|--------------|--|---|-----------------------------|
| CUSTOMERS    | <ul> <li>Enhanced value-added services provided</li> <li>Timely resolution of customer enquiries and complaints</li> <li>Proactive updates on changes to relevant programmes and service</li> </ul>  | <ul> <li>Conducting customer satisfaction surveys</li> <li>Engaging through email and SMS communications</li> <li>Interacting via the Company's website and social media channels</li> </ul>  | On-going                    |
| EMPLOYEES    | <ul> <li>Partnership initiatives with government bodies and NGOs</li> <li>Networking platforms to foster collaboration</li> <li>Strategic planning support and advisory services</li> </ul>  | <ul> <li>Establishing partnerships to advance mutual objectives and initiatives</li> <li>Offering financial assistance to aligned programmes or efforts</li> <li>Actively engaging stakeholders through direct interaction</li> </ul> | On-going                    |
| 17 INVESTORS | <ul> <li>Providing accurate and timely updates on<br/>the Company's financial performance</li> <li>Focussing on sustainable growth and long-<br/>term value generation</li> </ul>  | <ul> <li>Hosting the Annual General Meeting (AGM)</li> <li>Conducting media briefings</li> <li>Organising analyst meetings</li> <li>Holding quarterly earnings conference calls</li> </ul>  | Quarterly/Annually/On-going |
| REGULATORS   | <ul> <li>Ensuring timely compliance with legal and regulatory obligations</li> <li>Maintaining transparency in all operational activities</li> <li>Adhering to environmental laws and regulatory standards</li> <li>Making prompt and accurate tax payments</li> </ul> | <ul> <li>Engaging stakeholders through meetings, presentations, and networking events</li> <li>Conducting routine site visits and inspections</li> <li>Submitting annual and quarterly compliance reports</li> </ul>                  | Need basis/On-going         |

#### **KEY ISSUES ADDRESSED** MODE OF ENGAGEMENT FREQUENCY OF ENGAGEMENT INTRODUCTION Ensuring fair and equitable profit margins Implementing a structured onboarding On-going process Driving consistent revenue growth Conducting workshops through both online ■ Fostering long-term strategic partnerships SUPPLIERS AND and offline channels Collaborating with dependable and **PARTNERS** Utilising collaborative digital portals for trustworthy suppliers seamless interaction Promoting sustainable and responsible Gathering insights through supplier and SUSTAINABILITY sourcing practices partner feedback surveys **APPROACH** 08 Stakeholder Engagement Making direct investments in community-Engaging in CSR-driven volunteering On-going **11** Materiality Assessment driven projects and initiatives activities 13 Our Commitments, Targets Supporting educational programmes and Assessing the outcomes of interventions and Progress through Bharti Foundation's initiatives providing scholarships **18** Awards and Collaboration Offering youth-focussed training and ■ Conducting an annual employee feedback apprenticeship opportunities survey ■ Fostering an inclusive, transparent, and safe Organising regular employee **COMMUNITIES** workplace communication sessions Providing stable and secure employment Holding town hall meetings for open opportunities discussions **ENVIRONMENTAL** Recognising and rewarding achievements ■ Facilitating conferences, workshops, through formal appreciation programmes seminars, and training sessions for continuous learning Creating clear pathways for career growth and advancement within the Company SOCIAL Regular dissemination of press releases and Transparent and unbiased reporting On-going advisories ■ Ensuring the timely delivery of accurate information about the Company Organised press conferences and official briefings **MEDIA GOVERNANCE** Curated media tours and on-site visits One-on-one exclusive interviews and in-

depth background sessions

Interactive webinars and virtual press events

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## MATERIALITY ASSESSMENT

GRI 3-1, 3-2

As we embrace change and pursue sustainable growth, our focus remains firmly on purpose-driven profitability. Guided by robust strategic frameworks, we are well-positioned to identify emerging business opportunities, enhance stakeholder value, and maintain a strong liquidity profile.

We regularly evaluate stakeholder expectations and proactively address operational challenges to strengthen our capacity for long-term value creation. A key enabler in this process is our materiality analysis, which serves as a vital tool for aligning Nxtra's stakeholder priorities with the Company's strategic objectives, ensuring our actions support enduring, sustainable outcomes. This assessment is conducted every three years, with the most recent exercise carried out in FY23.

#### **MATERIALITY ASSESSMENT PROCESS**

01

Understand the Organisation's Context

Nxtra operates. This includes analyzing internal operations, sectorspecific dynamics, and global sustainability frameworks to identify areas where we are likely to generate significant impacts.

02

Identify Actual and Potential Impacts

03

Assess the Significance of the Impacts

04\_

Prioritise Topics for Reporting areas where we are likely to generate significant impacts.

Through extensive engagement with stakeholders, internal teams,

We begin by assessing the broader sustainability landscape in which

and subject matter experts, we identify key environmental, social, and governance topics that may have actual or potential positive and negative impacts on people and the planet across our value chain.

Each identified topic is evaluated for the scale, scope, and likelihood of its impacts. This helps us determine the relative importance of each issue, ensuring we focus on areas where Nxtra has the greatest responsibility and opportunity for influence.

The most significant impacts are prioritised as material topics for disclosure. This step includes validation with internal experts and external information users, ensuring our reporting reflects both the relevance to stakeholders and alignment with the GRI Sector Standards.

## KEY MATERIAL TOPICS LIST UNDER 5 IMPACT AREAS:



**Environmental Stewardship** 



**Customer Excellence** 



People-First Culture



Community Engagement



**Ethical Governance** 



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## OUR COMMITMENTS, TARGETS AND PROGRESS



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| MATERIAL ISSUES      | COMMITMENTS   | TARGETS   | PROGRESS   | GRI LINKAGE  | SDG LINKAGE  |
|----------------------|---|---|--|--|--|
| CLIMATE<br>STRATEGY  | Develop a comprehensive climate strategy focussed on adaptation, mitigation, and resilience to enable responsible growth and future-ready infrastructure. | Integrate the ISSB-aligned climate-<br>related disclosures into ESG governance<br>and reporting by embedding climate<br>risk assessment into enterprise risk<br>management, and track implementation<br>of mitigation plans across all data<br>centers.   | <ol> <li>Aligned with ISSB standards by integrating TCFD-based climate scenario analysis into our enterprise risk framework, enhancing climate resilience across our core data center operations.</li> <li>Integrated climate risk insights into operational resilience strategies and infrastructure upgrades, proactively mitigating potential climate-related disruptions.</li> </ol>   | GRI 2-22, 201-2                                    | 7 RESPONDENT PROCESSOR PROCESSOR PROCESSOR TO PROCESSOR PROCESSOR TO PROCESSOR PROCESSOR TO PROC |
| CARBON<br>EMISSIONS  | Reduce Scope 1, 2, and 3 greenhouse gas emissions in line with the long-term decarbonisation goals.   | <ol> <li>Scope 1 &amp; 2: Target near-zero emissions by FY31 (baseline: FY23), anchored in enhanced energy efficiency, operational decarbonisation, and a transition to renewable energy.</li> <li>Scope 3: Aim to reduce emissions by over 50% by FY40 (baseline: FY23), addressing value chain emissions through sustained engagement and improvement initiatives.</li> </ol> | <ol> <li>In FY25, reduced Scope 2 emissions by ~9% compared to FY21, despite 26% increase in the electricity use.</li> <li>In FY25, retired 188,507 tCO<sub>2</sub>e as a part of achieving Net Zero operational emissions.</li> </ol>   | GRI 305-1, 305-2,<br>305-3, 305-4, 305-5           | 7 disease of the particular of |
| ENERGY<br>MANAGEMENT | Leverage innovation to enhance energy efficiency, expand green energy use, and improve grid reliance.   | 1. Target a 10% reduction in Power Usage Effectiveness (PUE) by FY25, using FY21 as the baseline.  2. Achieve 70% renewable energy consumption across our core data centers by FY27.  | <ol> <li>Delivered on our commitment to reduce average PUE by 10% in FY25, against the FY21 baseline.</li> <li>All core data centers are ISO 50001:2018 Energy Management System (EMS) certified.</li> <li>In FY25, 49% of total electricity consumption at our core data centers was sourced from renewable energy.</li> <li>Contracted 482,800 MWh of renewable energy to power operations across 65+ facilities till date.</li> </ol> | GRI 203-1, 302-1,<br>302-2, 302-3,<br>302-4, 302-5 | 7 ARRIGABLE AND 9 AND STATE PROTECTION 11 DESTINABLE EXTENSION 12 DESTINABLE EXTENSION 12 DESTINABLE EXTENSION 13 DESTINABLE EXTENSION AND PROTECTION AND PR |



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|-----------------------|---------------|
| $\mathbb{A}$          |               |
| I I                   | ENVIRONMENTAL |

| MATERIAL ISSUES             | COMMITMENTS  | TARGETS   | PROGRESS  | GRI LINKAGE  | SDG LINKAGE  |
|-----------------------------|--|---|---|--|--|
| WATER<br>EFFICIENCY         | Minimise water footprint and achieve Zero Liquid Discharge across data centers through   | Achieve 100% wastewater recycling<br>in hyperscale DCs to become 'Water<br>Neutral'.  | In FY25, 15,329 KL of water recycled through advanced STPs, reducing freshwater dependency and enhancing circularity.                   | GRI 301-3, 303-1,<br>303-2, 303-3,<br>303-4, 303-5 | 12 MENORAL DISCOURTS AND A STREET OF |
|                             | advanced and efficient water management.   | Track and reduce Water Usage     Effectiveness (WUE) in core DCs  | 2. Real-time monitoring across the entire water cycle to track quality and usage.   |  |  |
|                             |  | through technological interventions.  | <ol> <li>Progressing toward 100% wastewater recycling<br/>and achieving water neutrality across all<br/>hyperscale campuses.</li> </ol> |  |  |
| WASTE<br>MANAGEMENT         | Advance waste management across all data centers by integrating smart technologies and the 3R principles – Reduce, Reuse, Recycle. | Attain a 100% landfill diversion rate by FY29.  | In FY25, 100% of battery, e-waste and other hazardous waste sold to government-authorised   | GRI 301-2, 306-1, 306-2, 306-3,                    | 12 SEPONSITION AND PRODUCED IN   |
|                             |  | <ol> <li>Enhance waste categorisation,<br/>reporting and maintaining 100%<br/>compliance with waste-related<br/>regulations.</li> </ol> | vendors.  2. In FY25, diverted 1,411 tonnes of waste from landfills through recycling initiatives.                                      | 306-4, 306-5                                       |  |
| GREEN BUILDING<br>MATERIALS | Adopt sustainable construction principles and environmentally  | Enhance resource efficiency and material circularity across the lifecycle   | All of our hyperscale data centers are IGBC Gold certified.   | GRI 301-1, 304-1, 304-2, 304-3,                    | 7 AMPRIAME AND 12 RESPONSING AND THE ADDRESS A |
|                             | responsible materials to reduce of data center infrastructure – from design and construction to operations and upgrades.           | 2. Adopted prefabrication techniques to ensure consistent turnaround times, unaffected by site conditions or weather.                   | 304-4   | 17 HATTECOPS                                       |  |
|                             |  | <ol> <li>All upcoming and hyperscale data<br/>centers to achieve a minimum of IGBC<br/>or LEED Gold certification.</li> </ol>           |   |  |  |





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| MATERIAL ISSUES                 | COMMITMENTS   | TARGETS   | PROGRESS  | GRI LINKAGE  | SDG LINKAGE  |
|---------------------------------|---|---|---|--|--|
| HUMAN CAPITAL<br>MANAGEMENT     |   | Maintain an employee engagement survey score above 80%.   | In FY25, achieved an Employee Engagement Score of 85 against 100.   | GRI 2-7, 2-27  | 3 MONTHERING 4 CONCARDA 5 COMMETY  W   |
|                                 | values and vision, fostering<br>their growth through training<br>and career development | r growth through training training hours per employee by career development FY27 (baseline: FY24) training hours per employee by labour or any other human rights-related issues. |   | 8 Inches seems 10 HORSETS 16 AGE FROM BRITISHES  |  |
|                                 | opportunities.  |   | 3. 'Zero' tolerance to discrimination based on Gender,<br>Ethnicity, Religion, Nationality, Social Origin, Political<br>Opinion, Disability and Race. |  |  |
|                                 |   |   | 4. 100% Code of Conduct training completion rate.   |  |  |
| DIVERSITY, EQUITY AND INCLUSION | Foster a diverse and inclusive workplace that facilitates                               | Create a culture of inclusion and enable equal opportunities for all.   | 1. 2.3x increase in gender diversity as compared to FY24.   | GRI 404-2, 405-1   | 5 GENGER 8 GEORING-GENTH 10 PRODUCED  10 PRO |
|                                 | opportunity and respect, focussing on gender, cultural and generational inclusion.      | Double gender diversity in our<br>workforce within three years with<br>FY23 as the base year.   |   |  | 16 MARAGERY NOTIFICAL MINISTRAL MINI |
| EMPLOYEE HEALTH Become          | Become industry-leader in   | Maintain zero LTIFR and fatalities for  | 1. Zero fatalities  | GRI 2-8, 2-25, 403-1,<br>403-2, 403-3,<br>403-5, 403-6,<br>403-7, 403-8,<br>403-9, 403-10,<br>416-1, 416-2 | 3 GOOD HEALTH 16 PEACE JUSTICE AND STRONG INSTITUTIONS   |
| & WELL-BEING                    | achieving exemplary health and saftey practices at all operation                        | Nxtra's projects as well as operational DCs.  | 2. 6,154,778 safe man-hours in construction.  |  |  |
|                                 | and construction sites, prioritising worker welfare.                                    | 2. Conduct safety induction and hazard-<br>specific training for all employees.   | <ol> <li>Maintained ISO 45001 occupational health<br/>and safety (OH&amp;S) certification for all core &amp;<br/>hyperscale DCs.</li> </ol>           |  |  |
|                                 |   | <ol> <li>Incorporate digitisation to minimise<br/>operational uncertainty and enhance<br/>health and safety performance.</li> </ol>   | Over 115 emergency drills and preparedness exercises successfully conducted.  | 410 1, 410 2   |  |
| COMMUNITY                       | Cultivate partnerships to aid   | 1. Make socially and environmentally  | 1. 8.8% increase in CSR expenditure.  | GRI 413-1  | 1 NO 4 QUANTY 10 REDUCED INCOMPLETE  |
| ENGAGEMENT                      | the development of local communities, minimise negative                                 | conscious investments in communities where we operate.  | 2. Created positive impact for over 125,000 beneficiaries across 27 schools in four states.   |  | Î¥ÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎÎ  |
|                                 | impacts and leave a positive legacy.  | <ol><li>Partner to support skill development<br/>and job training programmes for<br/>marginalised communities.</li></ol>  | 3. ₹ 61 million CSR expenditure during FY25.  |  | 17 roomerous   |



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| MATERIAL ISSUES                                | COMMITMENTS  | TARGETS   | PROGRESS  | GRI LINKAGE   | SDG LINKAGE   |
|--|--|---|---|---|---|
| CORPORATE<br>GOVERNANCE AND<br>BUSINESS ETHICS | Reinforce the organisation's commitment to operate with fair, transparent and ethical governance practices | <ol> <li>Augment diversity in the Boardroom.</li> <li>Operate with fair, transparent and ethical governance practices.</li> <li>Incorporate ESG into the corporate governance framework.</li> </ol> | <ol> <li>85.71% Non-Executive Directors.</li> <li>2.76 years average tenure of Board members.</li> <li>77% average Board attendance.</li> </ol> | GRI 2-9, 2-10, 2-11,<br>2-12, 2-13, 2-14,<br>2-18, 2-20                     | 16 MOR. AND THE MORTHWAY MOTHERS MOTHERS  |
| REGULATORY<br>COMPLIANCE                       | Maintain compliance with all applicable statutory requirements including those mandated by                 | Maintain compliance with annual certification on the Code of Conduct.   | A workflow-based compliance monitoring system to assign, track, and record all compliance and assessment-related activities.                    | GRI 2-15, 2-16,<br>2-23, 2-24, 2-26,<br>2-27, 205-1, 205-2,<br>205-3, 206-1 | 16 MAG. ANDEX MOTIONS NOTIONS NOTIONS   |
| central and st                                 | municipal corporations, and central and state government authorities, among others                         | <ol><li>Maintain 100% compliance with all<br/>the applicable laws and legislations<br/>in operational areas.</li></ol>  | <ol><li>100% stakeholders attained annual certification<br/>on the Code of Business Conduct.</li></ol>  |   |   |
| RISK & CRISIS                                  | Identify, assess and effectively manage risks associated with the widespread breakdown or                  | <ol> <li>Evaluate risks that could potentially<br/>disrupt business activities.</li> <li>Strengthen Company's overall risk</li> </ol>   | Comprehensive climate-related risk mapping and mitigation planning has been completed for all core data centers.                                | GRI 2-22  | 9 AUGUSTA INSCRIPTION   |
|  | failure of critical financial, natural resource and technological systems                                  | tical financial, natural management framework.  | <ol> <li>Maintained ISO 22301 Business Continuity         Management System (BCMS) certification for all core data centers.     </li> </ol>     |   |   |
| SUPPLY CHAIN through MANAGEMENT supply         | Maximise sustainable impacts through resilient and responsible supply chain practices and partnerships     | through resilient and responsible supply chain practices and supplier agreements.  criteria into pre-qualification and supplier agreements.   | 99% local procurement     99% of the strategic symplicity approach in ESC.  | GRI 308-2, 403-4,<br>411-1, 413-1,  | 8 ECCENT WORK AND THE MACH PROPER TO BE THE CALLS |
|  |  |   | <ol><li>98% of the strategic suppliers covered in ESG<br/>awareness and training programmes.</li></ol>  | 413-2, 414-2  |   |
|  |  |   | 3. 100% of suppliers have signed the Supplier Code of Conduct.  |   |   |
|  |  |   | <ol> <li>Considering safety criteria in partner evaluation for<br/>all RFPs above ₹ 5 million.</li> </ol>                                       |   |   |





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| MATERIAL ISSUES         | COMMITMENTS   | TARGETS   | PROGRESS  | GRI LINKAGE   | SDG LINKAGE                                 |
|-------------------------|---|---|---|---|---|
| DATA SECURITY & PRIVACY | Maintain a robust Information Security Policy and System covering all stakeholders in the value chain  Set industry benchmarks with the latest physical and digital infrastructure to secure data center operations and applications. | <ol> <li>Adopted seven layers of physical security across all core and hyperscale DCs.</li> <li>Zero breaches of information security or cybersecurity occurred.</li> </ol> | GRI 417-1   | 9 Manufert Remarking  16 Mark Antique Bentimens Bentimens  ***  **The Company of the Company of |   |
|                         |   |   | 3. Maintained Data Security Standard (PCI DSS), SOC 1 & SOC 2 Type II (including SSAE) for all core and hyperscale DCs. |   |   |
|                         |   |   | 4. Information security risk assessment and recovery strategy, certified by ISO 27001, 22301 standards.                 |   |   |
| CUSTOMER<br>EXPERIENCE  | Build strong partnerships to<br>deliver consistently high customer<br>satisfaction  | Attaining optimum customer loyalty and trust.   | Adopted 6-parameter strategy to enhance customer satisfaction.  |   | 9 INDICATE MONAGEMENT TO REDUCED SCHOOL FEE |
|                         |   | Ensure high customer satisfaction levels.   | 2. 24/7 customer support and service resolution by N-care team.   |   | •   |
|                         |   | 3. Conduct third-party surveys to obtain unbiased ratings.  | <ol> <li>Enhanced ESG ratings for customers through<br/>transparent and reliable ESG data sharing.</li> </ol>           |   |   |

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## **AWARDS**









## COLLABORATIONS



**UNGC Participant** 





SBTi Committed





Renewable Energy Partner





**Digitisation Partner** 





**CDP Member** 





Renewable Energy Partner





Renewable Energy Partner





**CSR Partner** 





RE100 Member

**TCFD Supporter** 





Renewable Energy Partner





Water Management Partner



8



Renewable Energy Partner.

**Bloomenergy**\*





Renewable Energy Partner





Waste Management Partner









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## CLIMATE STRATEGY

GRI 2-22, 201-2

## Building Climate-Resilient Digital Infrastructure for Tomorrow



#### **HIGHLIGHTS**

## Aligned with ISSB

standards by integrating TCFD-based climate scenario analysis into our enterprise risk framework.

Integrated climate risk insights into operational resilience strategies and infrastructure upgrades, proactively mitigating potential climate-related disruptions.

#### **SDG LINKAGE**













At Nxtra, we recognise the critical intersection of climate change and digital infrastructure. The urgency of the climate crisis demands a strategic, forward-looking response, especially for energy-intensive sectors like ours. Our climate ambition is anchored in building infrastructure that is not only high-performing and scalable, but also climate-resilient and low-carbon. Guided by the IFRS Sustainability Disclosure Standards issued by the International Sustainability Standards Board (ISSB), which build upon the foundational recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), we have adopted a scenario-based approach to assess climate-related risks and opportunities. These insights are integrated into our business continuity planning, operational resilience, and infrastructure design to ensure long-term sustainability and risk preparedness. This strategy enables us to anticipate disruption, adapt our operations, and continue delivering uninterrupted services while contributing meaningfully to India's climate goals.

Our focus remains on building long-term resilience, making informed decisions grounded in clear risk insights, and engaging transparently with stakeholders. This approach demonstrates our strong commitment to developing high-performing, climateresilient infrastructure that meets stakeholder expectations and supports national sustainability goals in a rapidly changing environment.

#### SUSTAINABILITY APPROACH



#### **ENVIRONMENTAL**

PHYSICAL RISKS

along with natural

disasters and supply

significant threats to

challenges, we have

established a robust

process that ensures

vulnerabilities across

operational resilience.

both existing and

planned facilities,

enabling timely

mitigation and

comprehensive evaluation of

physical risk assessment

To address these

data center continuity.

chain disruptions, pose

Climate change-related

events such as extreme

heat, floods, and storms,

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#### MANAGING CLIMATE-RELATED RISKS, OPPORTUNITIES, AND IMPACTS WITH FORWARD-LOOKING MITIGATION STRATEGIES

As climate change accelerates, data center face growing risks from rising temperatures, extreme weather events, and evolving regulatory landscapes. We proactively address these challenges through a comprehensive, time-horizon-based approach that balances immediate mitigation with long-term resilience. By deploying advanced technologies and implementing robust contingency plans, we enhance the operational efficiency and reliability of our data centers. We continuously monitor climate trends and integrate adaptive measures to future-proof our infrastructure. This dynamic strategy enables us to mitigate physical risks such as heat stress, flooding and so on.

We understand that our resilience underpins our customers' own sustainability and net-zero ambitions. By embedding climate risk management into our core operations, we safeguard business continuity, protect long-term investments, and contribute meaningfully to building a sustainable digital ecosystem.



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**RISKS** 

| PHYSICAL RISK TYPE                | CHRONIC      |  |  |
|-----------------------------------|--------------|--|--|
| ISSUE                             | TIME FRAME   | POTENTIAL IMPACTS ON BUSINESS  | MITIGATION/OPPORTUNITIES   |
| Temperature variations            | 1995 to 2014 | Rising frequency and intensity of heatwaves increase stress on cooling systems essential to data center operations, heightening the risk of overheating, equipment malfunctions, and potential service disruptions.  | <ul> <li>Data centers are engineered with advanced cooling technologies that optimise energy use and maintain operational stability during heat stress.</li> <li>Resilience is enhanced by integrating designs that withstand higher ambient temperatures and provide increased redundancy.</li> </ul>   |
| Changes in precipitation patterns | 2020         | Variability in rainfall can lead to increased flooding risks or water shortages, both of which threaten facility infrastructure and supply chains. Flooding can damage physical assets and disrupt connectivity, while reduced rainfall may affect water availability for various operational needs.   | <ul> <li>Infrastructure retrofitting plans include flood defences and drainage upgrades, along with water conservation measures to address both excess and shortfall scenarios.</li> <li>Continuous monitoring and site-specific risk mapping ensure adaptive responses to changing patterns.</li> </ul> |
| Water stress                      | 1979 to 2019 | Water stress presents a critical challenge to data center operations, affecting not just cooling systems but also essential functions like facility maintenance and sanitation. Prolonged stress on water resources can disrupt service continuity, increase operational risks, and drive the need for alternative sourcing, advanced recycling systems, and long-term water efficiency investments. | <ul> <li>Deployment of water-efficient cooling systems.</li> <li>Exploration of alternative technologies like airbased cooling and hydrogen-ready fuel cells.</li> <li>Long-term investment in water reuse systems and region-specific water resilience planning.</li> </ul>                             |

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#### TRANSITION RISKS

Rapid technological advancements bring both opportunities and challenges. Transition risks stem from emerging technologies, evolving customer expectations, and changing regulatory requirements, including climate-related disclosures and carbon regulations. Navigating these shifts requires agility in strategy and operations to remain competitive and aligned with a low-carbon, digitally transforming

#### TRANSITION RISK TYPE

#### POLICY AND LEGAL CURRENT AND EMERGING REGULATION

**ISSUE** 

Gaps in compliance frameworks and internal controls affecting adherence to evolving regulations and legal requirements.

Inefficiencies, financial losses, reputational damage

POTENTIAL IMPACTS ON BUSINESS

Ensure compliance with statutory bodies and government regulations; maintain updated knowledge of relevant laws across regions.

MITIGATION/OPPORTUNITIES

#### TRANSITION RISK TYPE

#### **MARKET / REPUTATION RISKS**

ISSUE

Geopolitical factors such as communal conflicts, strikes, political instability, civil unrest, pandemics, and social disturbances impacting market stability, reputation, and stakeholder confidence.

POTENTIAL IMPACTS ON BUSINESS

Increased volatility and uncertainty; potential business disruptions

MITIGATION/OPPORTUNITIES

Ongoing stakeholder engagement and continuous assessment of social landscape impacts to manage risks proactively.

#### TRANSITION RISK TYPE

#### **TECHNOLOGY RISK**

ISSUE

Risks arising from lagging behind in technology adoption, digital transformation, and innovation, affecting operational efficiency and competitiveness.

POTENTIAL IMPACTS ON BUSINESS

Increased costs, reduced agility, lower operational efficiency; shifts in customer value expectations

MITIGATION/OPPORTUNITIES

Prioritise digitisation and embed digital initiatives into business strategy to drive innovation and enhance adaptability.

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## CLIMATE-RELATED SCENARIO ANALYSIS

To proactively manage climate-related risks, we conducted a forward-looking, science-based scenario analysis across all data center locations, aligned with the IFRS Sustainability Disclosure Standards, which incorporate the TCFD framework. We assessed exposure to both acute and chronic physical climate risks under IPCC scenarios SSP2-4.5 (moderate emissions) and SSP5-8.5 (high emissions) for the years 2030 and 2050.

Our risk modelling incorporated historical meteorological data from the India Meteorological Department (IMD) and geospatial mapping tools to simulate climate hazards across Nxtra's operational footprint. Specific methodologies included:

- Flood and drought risks, assessed using the WRI Aqueduct tool under baseline and projected future conditions.
- Cyclone risks, evaluated using historical storm data combined with vulnerability parameters outlined by the National Disaster Management Authority (NDMA).
- Water stress risks, analysed under three scenarios, Pessimistic (SSP5 RCP8.5),
   Optimistic (SSP1 RCP2.6), and Businessas-Usual (SSP3 RCP7.0), using the WRI Aqueduct Water Risk Atlas.

This comprehensive assessment identified vulnerabilities to acute hazards such as floods, cyclones, and extreme precipitation, alongside chronic stressors including rising temperatures, long-term water scarcity, and sea-level rise. We quantified the resulting operational and

financial risks to guide prioritisation of climate adaptation strategies and investments in resilient infrastructure. By integrating these insights into our enterprise risk management and sustainability disclosures, we enhance long-term preparedness, increase transparency, and build stakeholder confidence.

## RISK MANAGEMENT – CLIMATE RELATED RISKS

We conducted site-level assessments to evaluate the effectiveness of existing mitigation measures such as flood barriers, cyclone-resistant designs, and water conservation systems. Following these evaluations, it was confirmed that Nxtra is well-prepared to manage high-risk scenarios, having implemented many of the recommended measures.

Our climate resilience was further strengthened through infrastructure hardening, such as elevating critical equipment and installing additional flood barriers, alongside enhancements to water security and the deployment of lower-emission energy backup systems.

Using a structured six-step, TCFD-aligned methodology, we defined objectives, collected data, scoped risks, generated climate scenarios, estimated impacts, and interpreted results. This process enabled quantification of financial risks associated with climate hazards, supporting improved strategic decision-making and reducing EBITDA volatility linked to climate events.

## Integration of Climate-Related Risks into Enterprise Risk Management (ERM) Process

Collaboration with a 3rd party consultant ensured scientific rigour and independent validation of our assessment process and findings. Integration of these insights into our enterprise risk management framework and sustainability disclosures strengthened governance, enhanced regulatory compliance, and boosted stakeholder trust through transparent, TCFD- and IPCC-aligned reporting.

Cross-functional collaboration embedded climate risk considerations into operational excellence initiatives and long-term planning, ensuring resilience remains a core element of Nxtra's growth strategy.



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## ENERGY MANAGEMENT

GRI 201-2, 203-1, 302-1, 302-2, 302-3, 302-4, 302-5

## Optimising Every Watt: Intelligent Demand, Clean Supply



#### **SDG LINKAGE**











We recognise that leadership in the digital infrastructure sector brings the responsibility to set new benchmarks for sustainable growth. As we continue our strong growth trajectory, energy management remains central to our ESG strategy. We are committed to designing and operating high-efficiency data centers that reduce environmental impact while supporting the increasing demands of the digital economy. By integrating renewable energy into our power mix, we are working to lower our carbon footprint and contribute to the global transition toward cleaner energy. At the same time, our focus on energy efficiency ensures optimal performance with minimal environmental impact. Through innovative technologies, strategic partnerships, and robust energy management practices, we are building future-ready facilities that deliver reliable service, sustainably and responsibly.

Our focus remains on building long-term resilience, making informed decisions grounded in clear risk insights, and engaging transparently with stakeholders. This approach demonstrates our strong commitment to developing highperforming, climate-resilient infrastructure that meets stakeholder expectations and supports national sustainability goals in a rapidly changing environment.

#### SUSTAINABILITY **APPROACH**



#### **ENVIRONMENTAL**

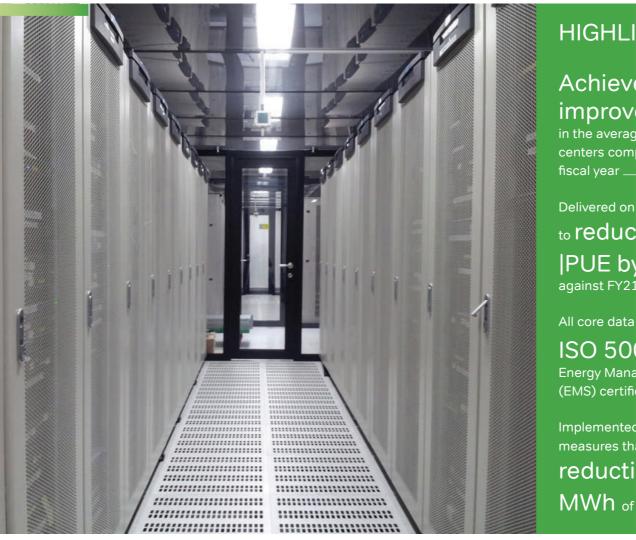
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## **ENERGY EFFICIENCY: Powering Performance with Less**



#### **HIGHLIGHTS**

Achieved a 2% improvement

in the average PUE for our data centers compared to the previous

Delivered on our commitment

to reduce average PUE by 10% in FY25, against FY21

All core data centers are

ISO 50001:2018

**Energy Management System** (EMS) certified

Implemented energy conservation measures that resulted in a

reduction of 12,420

MWh of cooling power

At the core of our sustainability strategy is a deep commitment to energy efficiency across our entire network of data centers. Our approach to demand-side energy management focusses on improving operational efficiency, reducing energy intensity, and optimising energy consumption across our data centers. By combining technological interventions with data-driven insights, we continue to make significant strides in managing our energy footprint responsibly. We recognise Power Usage Effectiveness (PUE) as a critical performance metric, and we are continuously investing in innovative interventions to drive down our PUE and optimise energy usage. To achieve this, we deploy advanced cooling solutions, adaptive thermal controls, free cooling systems, and Alenabled infrastructure management tools. These technologies enable us to intelligently regulate thermal loads and minimise the energy required for cooling, a major component of overall power consumption in data centers. Additionally, our use of modular design and high-efficiency power infrastructure helps reduce energy loss and improve system-wide resilience.

All our facilities are built or retrofitted to meet stringent energy efficiency standards, aligned with global best practices. We conduct regular energy audits and performance assessments to identify and implement improvement opportunities in real time.

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#### **Smart Design Sustainable Power** Enhancing efficiency Using energy-efficient through intelligent, state-ofequipment to drive the-art data center design low-impact operations **NXTRA'S FOCUS AREA Lean Operations Skilled Teams** Streamlining processes to Empowering our workforce reduce resource use and through targeted training maximise performance and development

#### LOWERING PUE, ELEVATING IMPACT

Through continuous tracking and benchmarking of PUE, we have implemented a portfolio-wide roadmap to reduce energy intensity. Our approach includes the deployment of cutting-edge cooling technologies such as cold aisle containment, free cooling, and Al/ML-driven thermal optimisation. Energy efficiency programmes are deeply embedded across our facilities, encompassing HVAC tuning, smart lighting systems, and load optimisation. These interventions are underpinned by intelligent monitoring through Al/ML and BMS platforms, enabling real-time visibility and predictive control of energy usage.

As part of our infrastructure modernisation drive, we are upgrading critical systems – like UPS and chillers – to high-efficiency models, unlocking significant energy savings. In parallel, we foster a culture of energy consciousness through targeted training and operational SOPs. Our efforts are further validated by ISO 50001 certifications and industry recognitions, reinforcing our commitment to energy excellence.

Together, these initiatives reflect our mission to optimise every watt and set new benchmarks in data center efficiency. Through data-driven insights and operational excellence, we have successfully maintained or improved PUE across our portfolio, even as workloads and computing demands increase.

#### **ENABLING SCALABLE GROWTH AND CLIENT IMPACT**

Beyond internal improvements, our energy efficiency initiatives play a direct role in helping clients lower their own value chain emissions. By hosting their digital infrastructure in our low-PUE, energy-optimised data centers, clients can significantly reduce their value chain emissions. This not only supports their decarbonisation goals but also enables scalable, cost-effective digital transformation.

By maximising energy efficiency, we extend the usable capacity of our data centers without the constant need for physical expansion. This leads to better space utilisation, reduced capital expenditure, and a lighter environmental footprint, all while delivering reliable, high-performance service for our customers.

## FUTURE-FIRST INFRASTRUCTURE, BUILT TODAY

We are redefining the future of digital infrastructure by revolutionising our data center designs to seamlessly integrate the evolving demands of Al workloads. Our next-generation facilities are being built with a sharp focus on flexibility, scalability, and resilience – ensuring they can adapt to rapid technological advancements while maintaining optimal performance. This forward-looking approach positions us to support the next wave of innovation and deliver intelligent, sustainable infrastructure for the digital world.

#### Civil



- Designed for high structural floor load capacity to support taller, denser racks
- Increased slab-to-slab height to enable flexible design of primary and secondary cooling loops
- Deployment on true floors by eliminating the need for raised floor tiles

#### **Electrical**



- Onsite GIS substation integrated to ensure high scalability
- Modular systems configured for flexible density across floor PODS
- Dedicated buffer zones on each floor to support additional utility infrastructure

#### Cooling



- Integrated chiller systems with distribution piping routed to and across all floors
- Proven concepts tested with multiple OEMs for direct-to-chip and single/dual-phase liquid immersion cooling
- Collaboration and knowledge-sharing sessions with broader ecosystem partners in liquid cooling technology

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#### Case Study

#### ARTIFICIAL INTELLIGENCE FOR ADVANCING OPERATIONAL EXCELLENCE



As part of our commitment to sustainable innovation, we partnered with Ecolibrium to become the first data center operator in India to integrate Artificial Intelligence (AI) for enhanced operational excellence. This milestone reflects our vision to build infrastructure that is intelligent by design and sustainable by choice.

Our Al journey began at our Chennai facility with the deployment of the SmartSense platform, which leverages advanced Al/ML algorithms to deliver real-time, data-driven insights. Following its success, we are now scaling the solution across all our core data centers.

Through this deployment, we aim to achieve measurable efficiency improvements, including:

#### 10% increase in asset life

through real-time analytics and early fault detection

15% improvement in equipment performance enabled by Al-based fault diagnostics

10% reduction in non-IT energy consumption by addressing inefficiencies at the equipment level

### 25% boost in operational productivity

through predictive maintenance and intelligent automation

By embedding AI at the heart of our operations, we are not only optimising energy consumption but also enhancing resilience, reliability, and cost efficiency across our portfolio. This initiative marks a significant step forward in our journey to build future-ready digital infrastructure that balances high performance with environmental responsibility.

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## ACCELERATING the Energy Transition with Purpose and Scale



#### **HIGHLIGHTS**

## Increased renewable energy usage by

14.5% in FY25 compared to the previous fiscal year \_\_\_\_\_

#### Transitioned 49%

of total electricity consumption in our core data centers to renewable energy in FY25

## Contracted 482,800 MWh of renewable

energy so far to power operations across 65+ facilities \_\_\_\_\_

At Nxtra, accelerating the energy transition toward a net-zero future is not just an ambition; it is the foundation of our renewable energy strategy. As India's largest data center network, and with plans to triple our capacity over the next five years, we are committed to driving large-scale decarbonisation by significantly increasing the share of renewable energy in our electricity mix.

#### SUSTAINABILITY APPROACH



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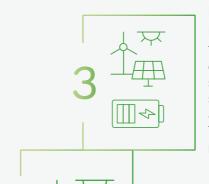
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## OUR APPROACH IS ANCHORED IN A **THREE-STEP STRATEGY**THAT PRIORITISES INNOVATION, SCALABILITY, AND RESILIENCE:



## Integrating Battery Storage for Peak Load Management

To address the challenges of intermittency and peak demand, we are now incorporating battery storage solutions. These systems allow us to firm renewable energy supply during hours when banking is restricted or grid access is time-bound, particularly in ISTS 15-minute slots. This hybrid, firmed renewable model ensures uninterrupted power while advancing our sustainability and reliability goals.

#### **Diversifying Renewable Sources and Supply Channels**

We then expanded our renewable energy portfolio by sourcing power from multiple generation types — including solar, wind, and hybrid projects, through both intra-state and interstate transmission systems (ISTS). This multi-source, multi-channel approach enhances energy availability, grid reliability, and clean energy utilisation.

#### Sourcing Renewable Energy from Dedicated Projects

We started by securing long-term Power Purchase Agreements (PPAs) with solar and wind power developers. These agreements provide a stable and predictable supply of green power, forming the backbone of our renewable-first energy model.

By embedding renewable energy deeply into our operations, we are not only reducing emissions at scale but also building a more resilient and future-ready digital infrastructure.

## FROM ELECTRONS TO IMPACT: LEADING THE NEXT PHASE OF RENEWABLE ENERGY INTEGRATION

We are advancing our renewable energy strategy through a series of bold and future-ready initiatives that combine technology, transparency, and impact. These efforts position us at the forefront of sustainable digital infrastructure.

#### Real-Time Energy Tracking with 15-Minute Granularity

We are leveraging cutting-edge technology to enable real-time tracking of renewable energy, tracing electrons from source to our data centers in 15-minute intervals wherever ISTS contracts are in place. This granular attribution allows us to match energy supply with demand in real time, ensuring the authenticity and impact of our clean energy usage.

#### **Ensuring Additionality and Expanding Renewable Capacity**

Our commitment to additionality ensures that every unit of renewable energy we procure directly supports the creation of new clean energy capacity. Through this proactive approach, we are not just offsetting consumption, we are accelerating the development of renewable infrastructure across India.

#### **Expanding Rooftop/Distributed Solar Infrastructure**

As part of our commitment to decentralised clean energy, we continue to scale our investments in rooftop/distributed solar solutions. These initiatives enhance our energy resilience, reduce grid dependency, and extend renewable adoption across our edge data centers. We continue to invest in distributed generation capacity: Installed rooftop solar systems across 27 locations, spanning both core and edge data centers

#### **Carbon-Aware Compute and Workload Alignment**

As our operations scale, so does our green energy mix. By aligning computational workloads with periods of high renewable availability, we are pioneering carbonaware compute, reducing emissions while maintaining operational excellence.

#### **Enabling Decarbonisation Across the Value Chain**

Our renewable integration strategy extends beyond internal impact. By hosting client infrastructure in our increasingly green-powered data centers, we help reduce their Scope 3 (value chain) emissions. This makes Nxtra a key enabler in supporting clients' ESG goals.

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**RE** 100

# NXTRA BY AIRTEL, JOINS RE100, COMMITS TO BECOMING A 100% RE-POWERED DATA CENTER COMPANY IN INDIA

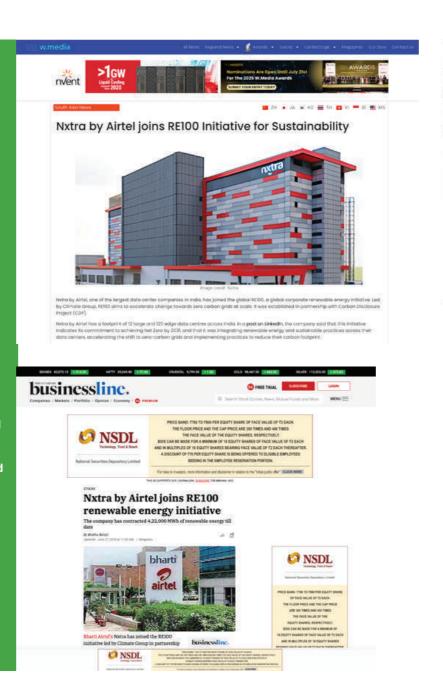
We have become the **first data center Company in India** to join the prestigious

RE100 initiative, pledging to source 100% of our electricity from renewable energy. Led by the Climate Group in collaboration with CDP,

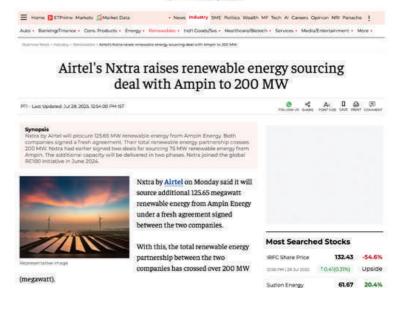
RE100 is a globally recognised gold standard that brings together companies committed to demonstrating leadership in sustainability and climate action.

As the **fourteen Indian Company accredited by RE100**, we have aligned this commitment with our broader goal of achieving Net Zero emissions by 2031. We have already made substantial progress on this journey, contracting **482,800 MWh** of renewable energy to date and significantly reducing our emissions footprint.

By championing clean energy, we are setting a new benchmark for sustainable data center operations in India and staying true to our purpose.







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#### POWER CONSUMPTION AT DATA CENTERS

#### **Core Data Centers**

| FY25    |  | 255,211 |
|---------|--|---------|
| F125    |  | 125,178 |
| E)/O 4  |  | 208,850 |
| FY24    | '//////////////////////////////////////                            | 108,309 |
| E) (0.0 |  | 175,976 |
| FY23    | '//////////////////////////////////////                            | 76,776  |
|         | tal electricity used in core ///// RE power (MWh) ta centers (MWh) |         |

#### **Edge Data Centers**

|      |  |   | 516,581 |
|------|--|---|---------|
| FY25 |  | 121,696                                 |         |
| FY24 |  | /////////////////////////////////////// | 500,591 |
| F124 | '//////////  |   | 107,422 |
|      |  | /////////////////////////////////////// | 481,084 |
| FY23 | '//////  |   | 77,462  |
|      | tal electricity used in core /////. ta centers (MWh) | RE power (MWh)                          |         |

#### **Total Renewable Energy (RE) Consumption**

| FY25   |                         | 246,874 |
|--------|-------------------------|---------|
| FY24   |                         | 215,732 |
| FY23   |                         | 154,238 |
| /////R | RE utilisation (in MWh) |         |

#### NXTRA BY AIRTEL Sustainability Report 2025

#### **Energy Consumption**

|      |                | 282,557   |
|------|----------------|-----------|
| FY25 |                | 1,889,702 |
|      |                | 888,748   |
|      | '/////         | 188,600   |
| FY24 | '////          | 177,348   |
|      |                | 776,637   |
|      | '/////         | 185,222   |
| FY23 |                | 1,810,158 |
|      | '///////////// | 555,258   |

#### Grid Electricity Emission Intensity (in tCO<sub>2</sub>e/Number of installed racks)

| FY25                                 |  | 13.65 |  |  |
|--------------------------------------|--|-------|--|--|
| FY24                                 |  | 13.18 |  |  |
| FY23                                 |  | 13.32 |  |  |
| ////, Electricity Emission Intensity |  |       |  |  |



#### **OUR PATH FORWARD**

As we look ahead, we remain steadfast in our pursuit of a sustainable digital future, driven by continuous innovation, bold investments, and an unyielding commitment to climate responsibility. By accelerating renewable energy adoption across our operations, we are not only redefining the energy paradigm for data centers but also playing a catalytic role in advancing India's net-zero journey and building a greener, more resilient digital economy.

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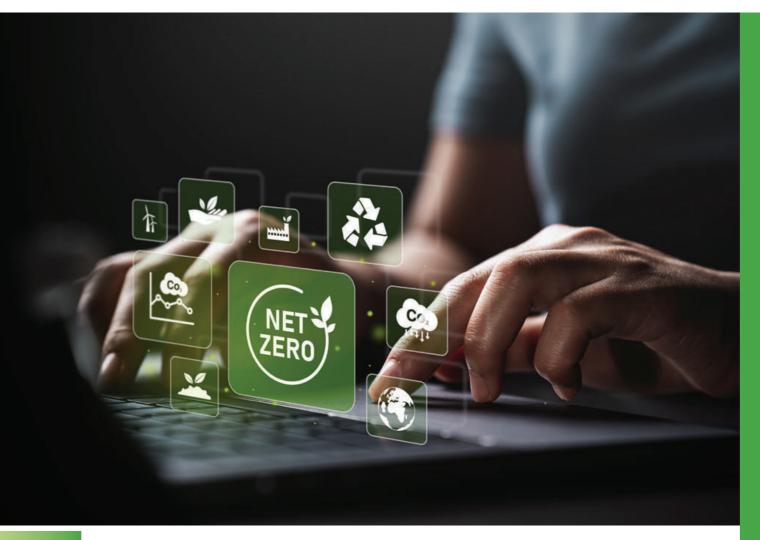
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## CARBON EMISSIONS

GRI 305-1, 305-2, 305-3, 305-4, 305-5

Towards Net Zero: One Rack at a Time



#### **SDG LINKAGE**













## **HIGHLIGHTS**

Reduced Scope 2 emissions by ~9%

compared to FY21, despite 26% increase in electricity use

### Retired 188,507 tCO<sub>2</sub>e

as a part of achieving Net Zero operational emissions

As our operations scale, so does our responsibility to long-term resilience. This approach is anchored in sciencechain. Our ambition is to enable a future that is low-carbon, resilient, inclusive, and sustainable.

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## ADVANCING ON THE NET-ZERO PATHWAY

We are deeply committed to advancing global climate action and enabling a more sustainable future. As a leading data center operator, we have joined the Science Based Targets initiative (SBTi) under the 'Business Ambition for 1.5°C' campaign, aligning our climate goals with the most ambitious target of the Paris Agreement. This places us among a select group of companies taking science-based, verifiable action to limit global warming to 1.5°C, in collaboration with SBTi partners including CDP, the United Nations Global Compact, World Resources Institute, and World Wide Fund for Nature.

Our near-term and net-zero targets have been submitted to SBTi Services and are currently undergoing the formal validation process. These commitments represent a critical milestone in our climate strategy to reduce emissions across all operations.

#### Scope 1 & 2

Achieve near-zero emissions by FY31 (baseline FY23) through energy efficiency, operational decarbonisation, and a major shift to renewable energy

#### Scope 3

Reduce emissions by more than 50% by FY40 (baseline FY23)

We expect our targets to be fully validated by SBTi within the next six months, reinforcing our commitment to science-based climate action and our contribution to a net-zero future.

## DECARBONISATION ACROSS OUR VALUE CHAIN

At the core of our sustainability commitment lies a comprehensive decarbonisation strategy that drives innovation across both the demand and supply sides of our operations. As a leading player in the data center industry, we remain steadfast in our efforts to combat climate change and build a sustainable future, even amid the challenges of rapid growth.

Our strategy is fuelled by strong partnerships and the integration of advanced green technologies that enhance operational efficiency and environmental performance across our facilities. Record investments in renewable energy sourcing underscore our commitment to reducing our carbon footprint. We continuously implement rigorous energy efficiency measures, optimising cooling systems, deploying highefficiency equipment, and applying industry-leading energy management practices.

Our efforts extend beyond infrastructure. We actively collaborate with suppliers and partners to identify emission reduction opportunities throughout our value chain, embedding sustainability into every aspect of our operations. We are reshaping our transportation and logistics systems by promoting fuel-efficient vehicles, alternative mobility solutions, and smarter logistics planning to reduce emissions from travel, commuting, and goods movement. Through these integrated efforts, we are making consistent progress toward our environmental goals.



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#### STRATEGIC LEVERS IN OUR NET-ZERO JOURNEY

Nxtra's progress along the net-zero pathway has been shaped by critical lessons that continue to guide our decarbonisation strategy and reinforce our role in advancing sustainable digital infrastructure. These are the strategic levers shaping our decarbonisation journey:

#### O1 Sustainability by Design, Not by Addition

Decarbonisation is embedded at the heart of our operations

– not layered on top. From infrastructure design and energy
procurement to supply chain and logistics, climate considerations
are hardwired into how we build and scale.

#### 02 Powering Change Through Collaboration

We don't do it alone. Our partnerships with renewable energy developers, technology innovators, and enterprise customers are key to delivering scalable, low-carbon solutions. These ecosystems drive impact far beyond our own footprint.

#### 03 Trust Built on Verified Data

Transparent, accurate emissions accounting across Scope 1, 2, and 3 is non-negotiable. All disclosures are independently assured under the AA1000 AS v3 (2020) Type 2 standard, reinforcing the credibility of our climate commitments.

#### Agile in the Renewable Transition

Scaling renewables in India's evolving energy landscape requires flexibility and foresight. We continuously adapt our procurement models and deploy hybrid energy solutions to stay on track, regardless of regulatory shifts.

#### O5 Activating the Entire Organisation

People power progress. Internal awareness, cross-functional engagement, and shared ownership of climate goals are as vital as the technologies we deploy. A net-zero culture starts from within.

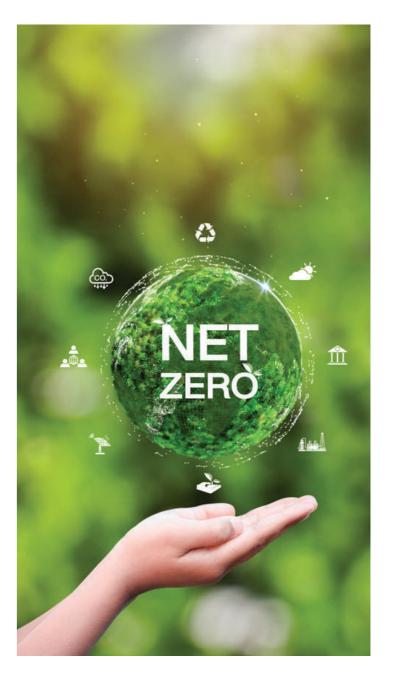
#### O6 Turning Vision into Action

We convert long-term ambitions into short-term, measurable milestones. This disciplined approach keeps us accountable and ensures we demonstrate real progress, year over year.

#### O7 Scaling with Resilience and Responsibility

Our infrastructure is built not just for uptime, but for the future. Every new build is energy-efficient, climate-resilient, and aligned with our commitment to responsible digital growth at scale.

We are not just on a path to net-zero, we are shaping the infrastructure blueprint for a sustainable digital India. These insights continue to fuel our strategy and solidify our leadership in the low-carbon transformation of India's data economy.



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## ALIGNING EMISSIONS WITH CLIENT USAGE

Our carbon reduction strategy continues to evolve in response to the growing climate ambitions of our clients, many of whom are prioritising supply chain decarbonisation and greater transparency. Their emphasis on rigorous reporting and accountability has played a central role in shaping our internal emissions management approach.

In FY25, we adopted a refined emissions boundary methodology to improve the accuracy and consistency of our greenhouse gas accounting, particularly in relation to energy consumption associated with client operations. Under select contractual agreements, emissions from electricity consumption, including both IT and non-IT loads, are attributed to clients as their Scope 2 emissions through a pass-through arrangement. Accordingly, these emissions are excluded from Nxtra's operational boundary to avoid double-counting.

This methodology has been reviewed and validated by the respective client stakeholders, ensuring alignment and mutual agreement on attribution. By aligning our disclosures with these principles, we are strengthening the integrity of our reporting and reinforcing our commitment to transparency, precision, and accountability in climate action.

## Scope 1 & 2 GHG emissions

|              |       | 29,991             |
|--------------|-------|--------------------|
| FY25         |       | 381,615            |
|              |       | 411,606            |
|              | '//,  | 25,625             |
| FY24         |       | 358,926            |
|              |       | 384,550            |
|              | ·///  | 26,008             |
| FY23         |       | 360,020            |
|              |       | 386,028            |
|              | - '// | 20,296             |
|              | '//,  | 20,290             |
| FY22         |       | 375,066            |
| FY22         |       | 375,066            |
| FY22         |       | 375,066<br>395,362 |
| FY22<br>FY21 |       |                    |

\*Greenhouse gas emissions directly generated from sources owned or controlled by Nxtra, along with indirect emissions arising from the electricity Nxtra purchases and consumes.

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#### Scope 3 GHG emission

We are committed to reducing both direct and indirect greenhouse gas (GHG) emissions across our operations. In line with the GHG Protocol: Corporate Value Chain Standard, we annually assess and report relevant Scope 3 emission categories to ensure accurate and transparent disclosure.

While certain Scope 3 categories are not directly applicable to our business model, our emissions profile spans multiple material categories that reflect the scale and complexity of our operations. These include emissions from purchased goods and services, capital goods, fuel- and energy-related activities (not included in Scope 1 or 2), upstream transportation and distribution, waste generated in operations, business travel, and employee commuting.

By identifying and addressing relevant Scope 3 categories, we ensure our decarbonisation strategy remains both rigorous and grounded in the realities of our operational footprint. This focussed approach enables us to prioritise high-impact areas while maintaining alignment with global standards and expectations on value chain emissions accountability.

We are actively advancing our emission reduction efforts through circular economy practices, sustainable procurement, green mobility solutions, flexible remote work policies, and virtual collaboration tools. Our transport and logistics strategy promotes fuel-efficient vehicles, alternative mobility options, and smarter logistics planning to cut emissions from travel, commuting, and goods movement. Together, these initiatives lower our environmental footprint and support more responsible, efficient operations.

| Inefficiencies, financial losses, reputational damage          | FY23    | FY24    | FY25    |
|--|---------|---------|---------|
| Purchased Goods and Services                                   | 6,635   | 5,344   | 7,441   |
| Capital Goods  | 19,895  | 17,472  | 16,339  |
| Fuel & Energy related activities (not included in Scope 1 & 2) | 164,467 | 163,112 | 174,531 |
| Upstream transportation & Distribution                         | 8,807   | 7,879   | 8,746   |
| Waste generated in operations                                  | 59      | 89      | 52      |
| Business Travel  | 98      | 118     | 150     |
| Employee Commute   | 399     | 452     | 301     |
| Total Scope 3 emission (tCO <sub>2</sub> e)                    | 200,361 | 194,469 | 207,560 |



Note: We measure and report Scope 1, 2, and 3 emissions annually, with third-party verification conducted per the AA1000 AS v3 (2020) Type 2 assurance standard, ensuring transparency, accountability, and credibility in our climate disclosures.

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## WATER EFFICIENCY

GRI 301-3, 303-1, 303-2, 303-3, 303-4, 303-5

## Innovating for Water-Wise Operations



**SDG LINKAGE** 





## **HIGHLIGHTS**

15,329 KL of water recycled through advanced STPs, reducing freshwater dependency and enhancing circularity

## Real-time monitoring

across the entire water cycle to track quality and usage

Progressing toward 100%

## wastewater recycling

and achieving water neutrality across all hyperscale campuses

At Nxtra, water stewardship remains a core pillar of our sustainability agenda – anchored in responsibility and driven by innovation. As the demand for digital infrastructure accelerates, so does the imperative to minimise environmental impact and enhance operational resilience. In FY25, we strengthened our approach through strategically designed water management initiatives that align resource efficiency with technological advancement and ecological responsibility.

We remain committed to a clear and ambitious goal: Achieving 100% wastewater recycling across all data centers and progressing towards Water Neutrality at the majority of hyperscale campuses. This objective is embedded within our ESG roadmap and is supported by advanced capabilities, including real-time telemetry, predictive modelling, and hydrological risk assessments integrated into the site selection process.

As global climate patterns continue to highlight the vulnerability of water ecosystems, we are transitioning from conventional conservation efforts to a more intelligent, data-driven approach to water governance. Through this shift, we aim to enhance the resilience of our infrastructure while contributing to the preservation of shared natural resources.

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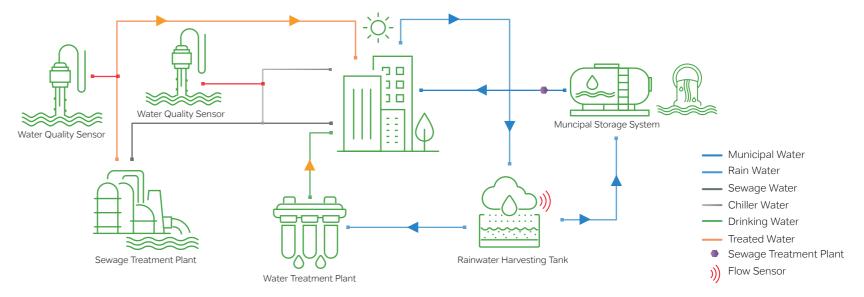
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## WATER BALANCE: WITHDRAWAL, DISCHARGE, AND CONSUMPTION

| Water Withdrawal (kl)     | FY25                     |
|---------------------------|--------------------------|
| Groundwater               | 9,876                    |
| Third-Party Water         | 191,152                  |
| Surface Water             | 0                        |
|                           |                          |
| Total                     | 201,028                  |
| Total Water Recycled (kl) | <b>201,028</b><br>15,329 |
|                           |                          |

#### DRIVING SUSTAINABLE RESOURCE STEWARDSHIP

At Nxtra, water is a critical yet scarce resource we are committed to managing responsibly. Recognising the water intensity of data center operations, especially in a rapidly urbanising and climate-constrained country like India, we have adopted a circular and data-driven approach to water efficiency across all our facilities.





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# OUR WATER MANAGEMENT APPROACH IS BUILT ON THE PILLARS OF CONSERVATION, REUSE, REAL-TIME MONITORING, AND ECOSYSTEM INTEGRATION.



#### **Municipal Water & Rainwater Harvesting**

We reduce dependency on freshwater sources by integrating rainwater harvesting systems with municipal supply. Rainwater is directed for treatment to maximise utilisation.

#### **Recycled Sewage Water**

Treated sewage water from in-house utilities is repurposed through various channels.



#### **IoT-Based Water Quality & Flow Sensors**

Real-time sensors monitor water quality and flow at every critical node – from inflow to reuse – enabling prompt action and transparency.

#### **Water Quality Surveillance**

Continuous monitoring ensures that water used in cooling towers, sanitation, and other facility operations meets safety and efficiency benchmarks.



#### Water Treatment Plants (WTPs)

Water from multiple sources is routed for purification before being used in operations and potable supply.

#### **Sewage Treatment Plants (STPs)**

All wastewater is collected, treated, and looped back into the system for non-potable uses like HVAC and landscaping – minimising discharge and enhancing water circularity.



#### **Rainwater Harvesting Tanks**

Strategically designed to capture and store rainwater, these systems reduce strain on municipal supply and recharge groundwater where possible.

## **Rainwater Integration into Grid**

Harvested water is treated and directly fed into the operational supply line, supplementing other sources.



### **OUTCOMES**

## Zero Liquid Discharge

Several of our sites are moving toward ZLD through highefficiency STPs and advanced recycling.

## Reduced Freshwater Intake

By maximising the use of treated and harvested water, we have significantly reduced our freshwater withdrawal per MW of IT load.

## Water Usage Effectiveness (WUE) Benchmarking

Our sites are measured for WUE and benchmarked against global best practices, with continuous improvements driven by data.

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### **OPTIMISING EVERY DROP: OUR WATER STORY**



### **Intelligent Water Lifecycle Monitoring**

We have established a real-time monitoring infrastructure that spans the entire water lifecycle, from intake to usage, treatment, and final discharge. This system provides end-to-end visibility, enabling enhanced control and responsiveness. The closed-loop mechanism ensures resource accountability, operational agility, and a measurable reduction in water waste.

## **Benchmarking Efficiency Through WUE**

We maintained Water Usage Effectiveness (WUE) levels much below industry standards across our hyperscale data centers, reflecting our commitment to global best practices. This metric is monitored continuously at each site and plays a critical role in infrastructure planning and performance optimisation, enabling sustainable and efficient growth.

## Strategic Investments in Water Reuse Technologies

Significant capital has been deployed towards advanced water reuse solutions, including Zero Liquid Discharge (ZLD) systems, rainwater harvesting infrastructure, and nano-filtration technologies. Implementation is underway across key locations, enhancing our ability to reclaim, recycle, and repurpose water with precision, particularly critical in water-stressed geographies.

## Reducing Water Dependency Through Air-Based Cooling

To minimise reliance on water-intensive cooling methods, we have implemented airbased chillers across the majority of our core facilities. This transition not only reduces water consumption but also addresses spatial efficiency by optimising infrastructural footprint, thereby supporting high-performance operations without compromising sustainability goals.

## MANAGING WATER STRESS: RISK ASSESSMENT AND STRATEGIC RESPONSE

At Nxtra, water stress analysis forms a key component of our site selection process for new data centers. By evaluating water availability and future stress indicators, we ensure that expansion plans align with long-term water sustainability. This proactive approach enables us to mitigate risks, support local resource resilience, and uphold responsible water stewardship from the outset.

#### **KEY MITIGATION STRATEGIES**

#### **Preventive**

Conduct water stress assessments as part of the site selection process

Waterproof ground-floor equipment to prevent water ingress

Elevate plinth levels in areas prone to flooding

Implement rainwater harvesting systems and Zero Liquid Discharge (ZLD) technologies

#### **Predictive**

Carry out infrared thermography audits for predictive equipment maintenance

### Operational

Ensure proper earthing and lightning protection systems are in place

Perform regular maintenance checks and torque tightening

Ensure proper server rack installation and incorporate cooling system redundancy



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## WASTE MANAGEMENT

GRI 301-2, 306-1, 306-2, 306-3, 306-4, 306-5

## Turning Waste into Worth: Enabling Circularity



SDG LINKAGE



## **HIGHLIGHTS**

100%

of battery, e-waste and other hazardous waste sold to government-authorised vendors

1,411 tonnes

of waste diverted from landfills through recycling initiatives

We recognise the critical role of responsible waste management in protecting the environment and enabling a circular economy. Our strategy is anchored in resource efficiency, transparency, and circularity. In 2025, we advanced this approach by adopting intelligent systems, forming strategic partnerships, and reinforcing compliance frameworks.

To support our zero-waste ambition, we prioritise waste reduction, reuse, and recycling through a structured 3R framework aligned with our philosophy of green interconnectedness. We manage all waste through authorised government-approved recyclers, refurbishers, and scrap dealers, with dedicated arrangements for the safe disposal of hazardous materials such as lube oil and transformer oil.

By aligning with industry best practices and going beyond compliance, we continue to minimise our environmental footprint, strengthen operational sustainability, and reinforce stakeholder trust through responsible and ethical waste management.

|                         | FY25 (tonnes) |
|-------------------------|---------------|
| Total Waste Generated   | 2,915         |
| - Other Hazardous Waste | 62            |
| - Non-Hazardous Waste   | 1,503         |
| - E-Waste               | 847           |
| - Battery Waste         | 503           |

Digital waste traceability platform in development with real-time monitoring, tracking and audit-ready data

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### IMPLEMENTING CIRCULARITY

Our goal is to achieve a 100% landfill diversion rate within the next four years by reducing waste at the source and embracing circular disposal practices, we are also committed to ensuring that all waste leaving our data centers is responsibly tracked and sustainably managed, preventing it from reaching landfills. To strengthen our circularity efforts, we have adopted a strategic approach focussed on:

## Waste Inventory and Tracking

We maintain a robust waste inventory and tracking system to enable efficient, transparent, and accountable management across all waste categories

## E-waste and Battery Waste Disposal

We dispose of e-waste, battery waste, and nonhazardous materials such as metal and equipment scrap through auctions to government-authorised vendors and registered scrap dealers, ensuring responsible and compliant waste management.

## Regulatory Compliance

We routinely initiate disposal requests for hazardous and other waste types in strict alignment with regulatory requirements, ensuring full compliance with applicable legal standards

## Hazardous Waste Disposal

Hazardous wastes such as oil, grease, and lubricants are responsibly managed through government-approved recyclers. We have long-term agreements in place to ensure consistent, compliant, and environmentally sound disposal practices.

### WASTE REDUCTION INITIATIVES AND PROGRESS

We have adopted a multi-pronged approach to waste management, combining responsible disposal, targeted recycling, and on-site treatment to reduce environmental impact and support our circularity goals. Through strategic partnerships, process innovation, and regulatory alignment, we continue to advance toward a zero-waste future.

## **Responsible Waste Disposal**

This year, we responsibly disposed of 95% of total waste through government-authorised vendors, ensuring full compliance with regulatory standards and the safe handling of both hazardous and non-hazardous materials. Our long-standing partnerships with certified recyclers and scrap dealers facilitate the proper disposal of e-waste, batteries, and hazardous substances such as lubricants, oils, and greases.

## **Certified Disposal Partners**

We work exclusively with CPCB-authorised e-waste recyclers and dismantlers for the safe and responsible disposal of obsolete servers, network equipment, batteries, and other electronic components.

## Recycling and Circular Waste Management

Through systematic segregation, reuse, and recycling initiatives, we successfully recycled 1,411 tonnes of waste across our data center facilities. Each waste stream, organic, electronic, or construction-related, is addressed with targeted strategies that prioritise reduction, material recovery, and reintegration into the circular economy.

### **On-site Incineration for Non-recyclables**

To manage dry and non-recyclable waste, we deployed on-site incinerators at select data centers. This enabled the safe treatment of waste and led to a net reduction of CO<sub>2</sub>e emissions. By preventing informal disposal and landfill buildup, these advanced systems demonstrate our commitment to sustainable and innovative waste management practices.

#### **Compliance and Documentation**

We maintain complete documentation for all e-waste movements and other necessary instructions for e-waste and hazardous waste aligned with all prevailing rules and regulations laid down by central and respective state governments. In FY25, 'Zero' incidents of non-compliance were reported with e-waste regulations.

## **Training and Awareness**

Internal operations and project teams are regularly trained on waste segregation protocols and proper handling of hazardous materials to avoid contamination and ensure safe disposal.

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### CONSTRUCTION WASTE MINIMISATION AT DATA CENTER SITES

As we are rapidly expanding our footprints pan-India, we undertake significant infrastructure development activities involving civil, electrical, and mechanical construction. Recognising the environmental footprint of these projects, we have institutionalised waste minimisation strategies across all phases of site development and expansion.

#### **KEY PRACTICES IMPLEMENTED**

## **Pre-construction Planning for Material Efficiency**

Site teams follow standardised BOQs and design guidelines to optimise material usage and reduce over-ordering and breakage.

## **On-site Segregation and Sorting**

Dedicated bins and areas are provided at all active construction sites to segregate inert, recyclable, and hazardous waste at source.

## Recovery and Reuse of Non-hazardous Materials

Non-contaminated concrete, metal scraps, bricks, and tiles are reused wherever possible within the site or transferred to other ongoing projects.

## Vendor Responsibility and Debris Accountability

EPC contractors are contractually obligated to ensure that all construction debris is removed from site and disposed of in accordance with local municipal guidelines and construction and demolition (C&D) waste rules.

## **Third-party Certified Disposal**

For large projects, disposal is carried out via **registered C&D waste handlers**, with documentation.

#### TRACEABILITY AND TRACKING OF WASTE

We recognise the importance of a robust, transparent waste management system to ensure compliance, reduce environmental impact, and maximise resource efficiency. Traditional methods lacked real-time visibility and traceability, resulting in operational inefficiencies. To address this, we are implementing an integrated digital waste management solution built around a Centralised Digital Locker.

This forward-looking platform will be designed to enable end-to-end traceability of waste, from generation to final disposal. It will consolidate documentation, automate vendor onboarding, and support real-time monitoring through SIM-based vehicle tracking and inventory analytics. Key features include:

- Comprehensive documentation and transaction management
- SIM-based vehicle tracking for transparent logistics
- Real-time waste flow and inventory analytics
- Dashboards to track key sustainability metrics

By embedding circularity principles and tracking performance through sustainability dashboards, the system will enhance audit readiness, strengthen vendor accountability, and support our goal of achieving zero waste to landfill. This tech-enabled approach reflects our commitment to efficient, ethical, and future-ready waste governance.





#### **OUR PATH FORWARD**

We continue to embed the Reduce–Reuse–Recycle model across all operations. From circular material loops and digital asset lifecycle management to responsible construction waste handling, each initiative is designed to reduce waste generation and deliver measurable sustainability outcomes.

Looking ahead, we remain committed to achieving 100% landfill diversion across all campuses. Backed by CAPEX investments in next-gen systems and real-time governance, we are closing the loop on waste, one material stream at a time.

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## GREEN BUILDING AND MATERIALS

GRI 301-1, 304-1, 304-2, 304-3, 304-4

## Embedding Sustainability into Every Square Foot



#### **SDG LINKAGE**





responsible construction.





At Nxtra, sustainability shapes our infrastructure vision. As India advances toward becoming a global leader in the green building movement by 2025, with over 4,300\* registered green projects covering more than 4.71 billion square feet and 1,250 certified operational buildings, we take pride in contributing to this transformation by integrating environmental responsibility

We remain dedicated to building resilient and sustainable data centers by embedding environmental considerations into every decision we make. Guided by Nxtra's climate strategy, we ensure that every site we select and infrastructure we design is built to withstand long-term climate challenges and deliver operational sustainability.

throughout our growth journey, from energy-efficient design to

At Nxtra, we believe that green infrastructure is not just an environmental imperative but a strategic enabler of long-term value. By integrating green building principles and sustainable materials into our data center design and construction, we are promoting low-carbon growth while creating spaces that foster innovation and operational excellence. Beyond energy and resource efficiency, we also recognise the positive impact of green spaces on employee well-being, providing healthier, more accessible environments that inspire productivity and reflect our commitment to holistic sustainability.

Source: \*Green Buildings Market Intelligence India Country Profile

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## INTEGRATING CLIMATE INTELLIGENCE INTO INFRASTRUCTURE DEVELOPMENT

At Nxtra, our commitment to green building begins long before construction – with a rigorous and forward-looking approach to site selection and infrastructure planning. We conduct comprehensive Threat and Vulnerability Risk Assessments (TVRA) to evaluate climate-related risks such as flooding, heatwaves, and extreme weather events, ensuring that our data center locations are strategically chosen for long-term resilience. This proactive methodology not only mitigates potential operational disruptions but also aligns with global best practices in sustainable infrastructure development. From the earliest design stages, we embed principles of energy efficiency and environmental stewardship by adhering to internationally recognised green building standards such as LEED and GRIHA. Our infrastructure incorporates renewable energy sources, alongside advanced technologies and next-generation cooling systems to reduce carbon emissions and enhance operational efficiency. At the heart of our strategy is the belief that resilient, sustainable data centers are built on a foundation of deep environmental understanding, innovative design, and cutting-edge technology - enabling us to deliver high-performance infrastructure.

Our strong commitment to sustainability drives us to adopt environmentally responsible practices across all our data centers, with the goal that 100% of our upcoming data center buildings achieve at least LEED or IGBC Gold certification



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#### **KEY FOCUS AREAS**



### **Pre-Site Environmental Testing**

Before finalising any location, we perform critical pre-tests to evaluate natural environmental conditions. This serves a dual purpose: first, to ensure the facility we build meets our world-class specifications; second, to preserve the site's topography and natural terrain without disrupting its core characteristics. Typical tests include soil analysis, ambient air quality measurements, and contour mapping.



## **Future-Proof Design Using Advanced Simulations**

We collaborate with external experts to conduct Computational Fluid Dynamics (CFD) analyses for all-new sites, ensuring our designs are resilient against rising temperatures and increasing power densities per rack. To counter growing seismic risks, we also reinforce our structures and brace distributed components to meet seismic safety standards.



## **Efficient Architecture and Component Selection**

We carefully select all core and subcomponents, including electrical, mechanical, control systems, and telecom equipment, with a focus on operational efficiency and minimising physical footprint. Since data center space is a premium resource, choosing compact, high-performance technical components supports our green building goals.



## **Reliable Cooling and Power Continuity**

With rising power densities, our air conditioning systems are supported by uninterruptible power supplies (UPS) to guarantee continuous cooling during power transitions between the grid and backup generators



## **Prefabrication for Consistency and Timeliness**

Utilising prefabrication techniques enables us to maintain consistent turnaround times that are not affected by site location or local weather. This approach ensures we deliver on our timelines reliably, helping us meet customer expectations and maintain optimal supply capacity.



## **Integrated Telecom Services for Digital Leadership**

Our data centers host the full range of Bharti Airtel's services, including next-generation telecom solutions like SD-WAN, IoT, collaboration tools, cloud-on-the-ramp, and LEO satellite connectivity. This integrated ICT portfolio supports hybrid architectures and performance-driven services, enabling our customers to stay ahead in their digital transformation journeys.

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## PREFABRICATED CONSTRUCTION AND NATURAL LIGHT USE

At Nxtra, we adopt prefabricated construction techniques that deliver substantial environmental and operational benefits. By manufacturing components in controlled environments, we reduce construction waste through precise material usage and avoid excess. This method also helps lower carbon emissions by decreasing energy consumption during construction and limiting the transportation of materials to the site. Prefabricated structures are designed to include energy-efficient features such as highperformance insulation and HVAC systems, which reduce energy use and emissions over the building's lifecycle. We also ensure that all construction materials comply with our defined sustainability requirements.

In addition to prefabrication, we optimise natural light integration to further enhance energy efficiency. The integration of natural light into our data center designs further enhances environmental performance by reducing the need for artificial lighting. This leads to lower electricity consumption and improved energy efficiency. We combine natural lighting with smart lighting strategies such as LED fixtures and motion sensors, which have already resulted in significant energy savings across our facilities. These efforts not only reduce operational costs but also strengthen our commitment to sustainable development.

## HEAT RESILIENT CHILLERS TO FUTURE PROOF AGAINST CLIMATE EXTREMES

To address rising climate variability, we integrate heat-resilient chillers and advanced cooling technologies that maintain optimal operating conditions even during periods of extreme temperatures. These systems are engineered for high energy efficiency and operational reliability, helping us reduce the risk of equipment failure or service disruptions caused by heatwaves or sudden temperature spikes. By strengthening our cooling infrastructure with future-ready solutions, we ensure uninterrupted performance across our data centers while minimising environmental impact.

# PREPARING TO INTEGRATE LEO SATELLITES AND NEXT-GENERATION NETWORK ARCHITECTURES

We are advancing our infrastructure to support emerging technologies such as Low Earth Orbit (LEO) satellites and next-generation network architectures, which are essential for extending 5G coverage and strengthening network resilience. LEO satellites require ground stations and data centers capable of handling high data throughput with low latency. Our scalable, secure, and environmentally responsible data centers are designed to meet these demands, offering flexible power and rack capacity to support seamless integration of satellite communication systems.

This integration will allow us to support a hybrid network model that combines terrestrial and space-based infrastructure. In doing so, we aim to enhance connectivity in remote and disasterprone areas while maintaining energy efficiency and ensuring continuous operations.





#### OUR PATH FORWARD

As we continue to expand our footprint, we remain committed to scaling responsibly, by choice and by design. Our vision for green infrastructure goes beyond compliance; it reflects a conscious decision to integrate sustainability into the DNA of every data center we build. With each new facility, we strive to push the boundaries of environmental performance, blending cutting-edge technology with climate-conscious design. We will continue to invest in resilient infrastructure, and innovative engineering solutions that enable us to grow without compromising the planet.

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## BIODIVERSITY – Building with Nature in Mind



Nxtra uses a comprehensive sustainability framework embedded throughout the design, construction, and operation of data centers to evaluate the impact of its infrastructure on local ecosystems. This framework guides the integration of precautionary measures focussed on impact mitigation, ecological restoration, and habitat protection, enabling Nxtra to actively support biodiversity while enhancing environmental integrity and operational resilience.

All Nxtra facilities are strategically located away from legally protected areas and zones of high biodiversity value, including those identified by national authorities and international standards. Through rigorous environmental due diligence, Nxtra ensures its operations do not adversely impact IUCN Red List species, nationally protected species, or critical habitats essential to their survival.

## Greenbelt Development for Biodiversity Enhancement

To enhance local ecosystems, Nxtra undertakes Greenbelt Development around its data centers, planting native and ecologically suitable species in consultation with environmental experts. These greenbelts help improve air quality, expand green cover, and strengthen site-level biodiversity. By fostering habitats that support local flora and fauna, the initiative promotes ecological balance and strengthens the resilience of surrounding environments.

Recognising the intrinsic link between ecosystem health and long-term business performance, Nxtra ensures biodiversity considerations are embedded across every stage of infrastructure development. Furthermore, we strictly follow environmental laws and also adopts the best voluntary practices. This shows our strong commitment to sustainable and responsible growth

As Nxtra advances, it remains steadfast in its dedication to environmental stewardship, striving to develop infrastructure that harmonises with nature and supports the long-term vitality of surrounding ecosystems.

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## HUMAN CAPITAL MANAGEMENT

GRI 2-7, 2-27

## Nurturing talent, driving impact



## **HIGHLIGHTS**

85/100

Employee engagement score achieved

3.095 + 1

Learning hours

100%

CoC training Completion Rate

#### **SDG LINKAGE**













At Nxtra, it all starts with our people, the driving force behind every breakthrough and bold ideas. More than just team members, they are the foundation of our purpose. Their talent, dedication, and everyday actions turn vision into value, and ambition into lasting impact.

We believe that true success goes far beyond what charts or reports can capture. It ignites spark of collaboration, thrives in the resilience shown during challenges, and shines in the pride of meaningful work. That's why we've made it our mission to build more than a workplace; we're creating a culture driven by purpose, empowerment, and shared growth.

A thriving workplace starts with empowered voices. We invest in our people's growth not just to sharpen their skills, but to build confidence. We foster an environment where ideas are encouraged, feedback is open, and every achievement is recognised. From the smallest initiative to the biggest breakthrough, we celebrate the effort, teamwork, and progress behind every success.

At the core of Nxtra is a belief that when people feel valued and empowered, they bring their best selves to work. And when that happens, we don't just move forward, we move forward together, stronger than ever.

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## **Upholding Human Rights Across the Value Chain**

At Nxtra, respect for human rights is not just a policy, it is part of how the Company operates every day. Guided by a Human Rights Policy aligned with global standards, Nxtra ensures fairness, dignity, and equal opportunity for all employees, partners, and communities.

These principles are reinforced through the Company's Code of Conduct, which outlines clear expectations for legal compliance, workplace behaviour, and ethical engagement. All employees receive annual training, supported by continuous learning initiatives that help embed these values into the culture.

Nxtra also expects the same commitment from its vendors and partners. Through a dedicated Code of Conduct for Business Associates, the Company promotes integrity and responsibility across its entire value chain.

## **Grievance Redressal and Ethical Resolution Mechanisms**

Nxtra is committed to building a workplace where everyone feels safe, heard, and respected. To support this, the Company has developed a strong grievance redressal framework that aligns with its ESG commitments and SEBI's BRSR requirements.

The Employee Resolution Portal, provides a digital platform where employees can easily log, track, and resolve concerns. Built on Service Now, the portal routes all complaints to a central mailbox managed by the Ombuds Team. From there, they are forwarded to the appropriate Circle or Business HR teams for resolution.

## Leveraging employee feedback to shape culture and policy

Nxtra believes the best insights about workplace culture come from its people. To capture these insights, the Company **uses, an Al-powered employee engagement platform** that encourages open and confidential communication.

Employee feedback is collected during key moments such as onboarding, performance reviews, and regular pulse checks at tenure milestones. This helps leaders understand employee sentiments and take meaningful action.

Importantly, employees are kept informed about how their feedback is used. This builds transparency, trust, and a sense of shared ownership. The insights gathered help shape policies, improve culture, and enhance the overall employee experience.

## **Empowering Employees for Digital and Green Transitions**

At Nxtra, the journey starts with a smooth, sustainable, and customised onboarding experience for every talent. Our talent strategy combines cutting-edge digital innovation with a deep commitment to sustainability. From the moment a new hire joins us, our fully digitised onboarding process delivers a smooth, paperless experience accessible anytime, anywhere. Whether it's submitting documents, meeting their team, or completing learning modules, every interaction is intuitive and effortless. Every onboarding experience is a step toward a more connected, conscious, and future-ready workplace.

## Darwinbox: One Platform, Endless Possibilities

Our unified recruitment platform, DarwinBox, is reshaping the talent experience streamlining external hiring and empowering internal mobility. With a dynamic Internal Job Posting (IJP), employees can discover new opportunities, track applications in real time, and take charge of their career growth like never before.

We are committed to upholding human rights principles guided by our policy and aligned with global standards including those set by the International Labour Organisation (ILO) ensuring equal opportunity, fair compensation, freedom of association, and the right to collective bargaining.



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#### A CULTURE OF CONTINUOUS GROWTH:

At Nxtra, learning is a gateway to possibility, a continuous journey that empowers our people to thrive and lead with confidence. In a world of constant change, we've redefined learning to be agile, accessible, and deeply engaging. Our digital-first platforms put growth at everyone's fingertips, while immersive leadership programmes unlock potential and fuel ambition. Every learning experience is a step toward building a brighter, bolder future for our people and our business. Because at Nxtra, learning isn't just about keeping up, it's about moving forward with purpose and optimism.



Upskilling through Unified Behavioural Framework

(UBF) Workshops



4 structured leadership tracks under the Leadership Academy



Learning Experience Platform (LXP)-enabled digital learning. available anytime, anywhere



**Fully digital** onboarding through iLearn with mandatory ESG training



Multi-format delivery: instructorled, digital, coaching, workshops, simulations

## A Journey of Growth, at Every Level

At Nxtra, we believe in unlocking potential at every stage right from day one to the boardroom. Whether it's a new joiner starting their journey or a CXO shaping strategic direction, every employee deserves equal access to opportunities for learning, growth, and leadership. This belief drives our commitment to a layered, responsive learning ecosystem designed to adapt to individual needs, support diverse career paths, and equip our people to navigate the future with confidence.

#### Airtel Leadership Academy

An experiential programme with four curated tracks Emerging, Future, Advanced, and Executive designed to equip leaders with strategic and people-centric skills.

### **Embark & Hiring Edge**

Tailored for first-time and experienced people managers

## **Beyond the Classroom**

Learning at Nxtra blends structure with flexibility ensuring it fits seamlessly into every career stage.

### **UBF Workshops**

Interactive sessions that have equipped employees with core behavioural and managerial skills driving real impact at the team level.

#### **Functional & Compliance Training**

From role-based technical skills to regulatory requirements, our learning is as practical as it is forward-looking.

#### **Mandatory Modules**

Including POSH, ESG & Human Rights, Code of Conduct, and Information Security.

### **Anytime, Anywhere Learning**

#### LXP

A digital-first, self-driven space where employees explore curated toolkits, on-demand courses, and career-aligned content.

#### iLearn

Through platforms like iLearn, Airtel and Nxtra have established a central hub for training resources that promotes a culture of continuous learning. The platform follows a structured, hierarchical framework offering development opportunities across four levels ensuring every employee, regardless of role or tenure, receives learning tailored to their needs. From day one, new hires engage in a comprehensive digital induction via iLearn, covering essential topics such as sustainability, anti-corruption, and POSH, embedding key values early and making professional growth an integral part of the everyday work experience.

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## BUILDING A CULTURE OF LEARNING AT NXTRA

At Nxtra, learning isn't confined to classrooms or calendars, it's a daily journey, seamlessly woven into the flow of work. We've built a learning experience that's accessible, engaging, and personalised for every individual. Through platforms like our LXP and dedicated softskills portals, employees can take charge of their development, exploring behavioural and functional courses tailored to their roles, at their own pace. This flexible, self-directed approach is actively supported by our HR teams, who help sustain momentum and ensure every learning loop is complete.

More than a digital initiative, it's a reflection of our deeper purpose: to grow well-rounded, future-ready talent across both technical and leadership tracks one learning moment at a time.

## Upholding values: annual compliance education

At Nxtra, values are more than words on paper, they're lived every day. Integrity and accountability form the cornerstone of our culture, and we bring these to life through our annual Code of Conduct (CoC) training. Every year, without exception, each employee reaffirms their commitment by completing the training and signing a declaration. With timely internal communications and updates on evolving policies, we ensure our people are empowered with clarity and confidence to uphold the highest ethical standards in every decision they make.

## Fuelling development through performance and growth reviews

At Nxtra, we see performance reviews as a catalyst for meaningful growth rather than a mere formality. Our Performance Management System (PMS) combines 360° feedback with honest, constructive dialogue creating a transparent environment where employees understand their strengths and growth opportunities clearly. This system encourages continuous learning, recognises high achievers, and supports career advancement. By fostering open communication and mutual trust, we empower every team member to take ownership of their development journey and contribute to collective success.

## The impact

Through NxtLearn and our extensive learning ecosystem, Nxtra is nurturing a workforce that's agile, confident, and future-ready. Each course completed and every leadership skill developed adds momentum to a culture of continuous improvement and innovation. This isn't just training, it's a transformative experience that equips our people to lead change, seize new opportunities, and drive the Company's long-term vision forward with purpose and passion.

| Training Type          | Learning |  |
|------------------------|----------|--|
|                        | Hours    |  |
| Behavioural/Leadership | 520      |  |
| Digital                | 334      |  |
| Functional             | 341      |  |
| Mandatory              | 1,901    |  |
| Grand Total            | 3,095    |  |



## LEADERSHIP ACADEMY: SHAPING TOMORROW'S LEADERS, TODAY

Leadership at Nxtra is a conscious and purposeful journey, starting with the Airtel Leadership Academy. More than just a programme, Airtel Leadership Academy serves as a springboard for leaders at every level, unlocking potential and fostering resilience in a fast-changing business landscape. Through immersive bootcamps and customised development pathways, Airtel Leadership Academy equips leaders at every level with the strategic vision, agility, and confidence to inspire their teams and drive the future. It's where raw talent evolves into visionary leadership, ensuring Nxtra stays ahead in a dynamic world.

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## A Leadership Journey that Grows with You

Every Airtel Leadership Academy journey begins with a Leadership Bootcamp, a high-impact immersion into self-discovery, core leadership principles, and personalised development planning. Participants then transition into structured programmes aligned with their career stage and growth aspirations.

## **Leadership Tracks at a Glance**

#### XLP

## **Executive Leaders Programme**

For senior leaders spearheading strategic transformation across the organisation

### ALP

## **Advanced Leaders Programme**

For experienced managers stepping into cross-functional, high-stakes leadership roles

### FLP

## **Future Leaders Programme**

For mid-level talent ready to take on expanded mandates and team leadership

#### ELP

## **Emerging Leaders Programme**

For new managers building strong foundational skills to lead with confidence

At the Mumbai location, 30% of senior management (defined as AVP and above) are hired from the local community.

## What constitutes AIRTEL LEADERSHIP ACADEMY apart?

#### **Selective Nomination Process**

Ensures high-potential talent is identified and nurtured with precision

#### **Multi-format Learning Experience**

Blends workshops, mentoring, peer learning, and real-world projects for maximum impact

#### **Bootcamp Kickoff**

Anchors participants in self-awareness, values-based leadership, and long-term visioning

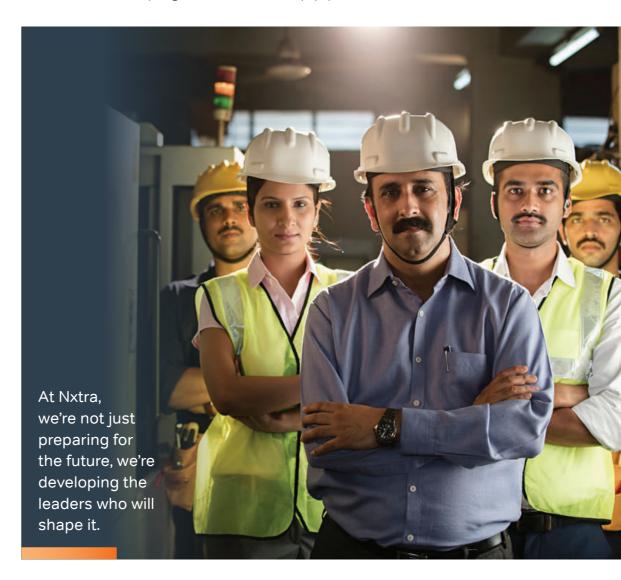
## **Driving strategic impact**

Airtel Leadership Academy is not just about individual growth, it's about creating a ripple effect of leadership excellence across the organisation. By nurturing talent from within, Airtel Leadership Academy:

- Aligns leadership capability with business goals
- Accelerates succession readiness
- Cultivates a consistent culture of performance, empowerment, and innovation



Developing a core leadership pipeline at all levels.



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## NxtLearn

## EMPOWERING GROWTH THROUGH CONTINUOUS LEARNING

With the rapid pace of change in today's professional landscape, traditional, one-time training methods are no longer sufficient. Employees now expect learning experiences that are continuous, relevant, and aligned with their personal and professional growth.



In response to this shift, Nxtra took a strategic step toward building a learning culture that evolves with its workforce. The goal was to move beyond check-the-box training and create a journey of continuous development. This vision led to the creation of a robust initiative designed to redefine how learning takes place across all levels of the organisation.

## Description

NxtLearn is Nxtra's comprehensive learning initiative designed to foster employee growth across all levels. It offers a variety of learning formats – such as **Virtual Sessions, Self-Paced modules, and the Xpert Masterclass** – to deepen domain expertise, promote collaboration, and drive cross-functional learning.

### **Background**

At Nxtra, learning is embraced as an ongoing journey rather than a one-time event. With the evolving needs of its dynamic workforce in mind, Nxtra introduced NxtLearn to ensure every employee has access to meaningful, personalised development opportunities.

#### VIRTUAL SESSIONS - SELF PACED





### **Objective**

To offer employees the freedom to learn at their own pace, these sessions were curated around core operational themes such as ESG, Safety and DC operations management, allowing participants to strengthen foundational knowledge in a flexible format.

#### **Action Taken**

With the aim of reaching every Nxtra employee, the initiative achieved strong participation across the organisation.

The sessions struck a meaningful chord with learners, as reflected in the consistently high satisfaction scores and positive feedback received.

#### Outcome

Learners found the sessions highly relevant and appreciated the opportunity to broaden their perspective beyond their immediate roles. The feedback emphasised the value of cross-functional exposure and suggested a strong appetite for even deeper dives into operational subjects in future sessions.

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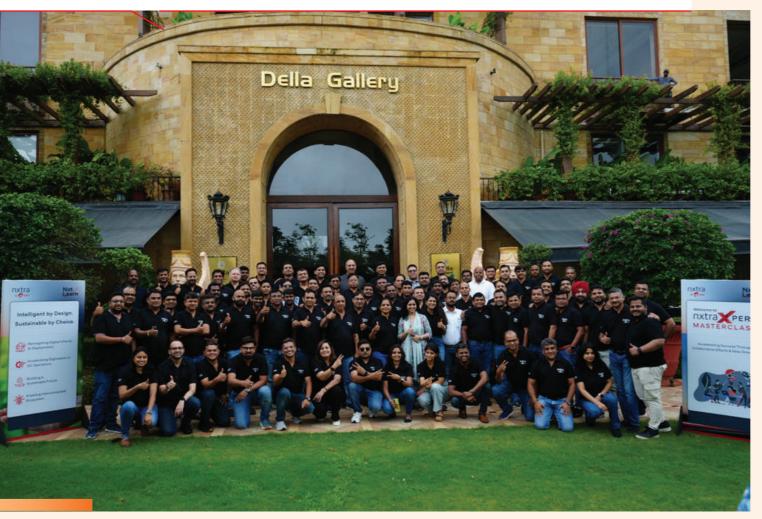
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#### **XPERT MASTERCLASS**





## Objective

Designed to go beyond foundational learning, the **Xpert Masterclass** series brought in subject matter experts to lead immersive sessions aimed at deepening strategic thinking, technical acumen, and collaborative problem-solving.

### **Action Taken**

These masterclasses offered a rich blend of knowledgesharing and real-time interaction, with content tailored to emerging trends and functional developments.

#### Outcome

The Xpert Masterclass format proved to be a resounding success, combining in-depth insights with peer learning and engagement. Participants valued the exposure to broader business initiatives and expressed a strong interest in practical, equipment-based training as the next step in their learning journey.

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#### SOCIAL

- 50 Human Capital Management
- 57 Diversity, Equity and Inclusion
- 61 Employee Health and Well-being
- 69 Community Engagement

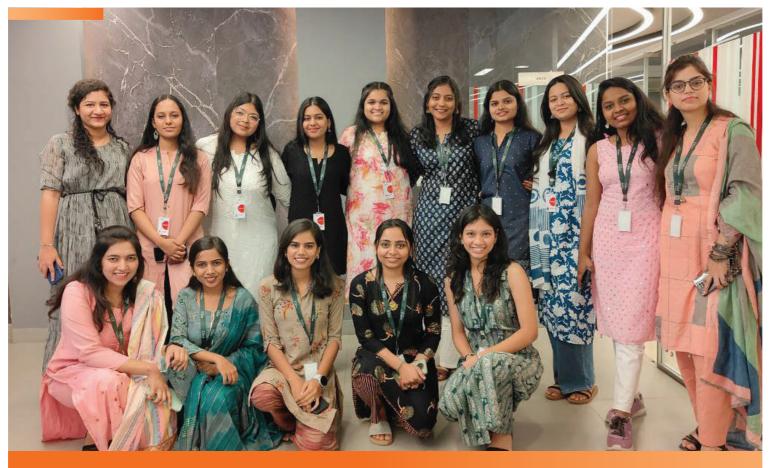
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## DIVERSITY, EQUITY AND INCLUSION

GRI 404-2, 405-1

## Celebrating Differences, Inspiring Possibilities



**HIGHLIGHTS** 

2.3x

#### **SDG LINKAGE**









At Nxtra, we see diversity not just as a value, but as a strength, one that fuels innovation, broadens our perspectives, and shapes a workplace where everyone belongs. Each person brings a distinct strength, and we are dedicated to fostering an environment that embraces diversity, empowers self-expression, and fuels personal and professional growth.

In the past year alone, we've seen a 2.3x increase in female representation, a clear reflection of our efforts to build a more inclusive and balanced workforce.

We see diversity not as a box to check, but as a source of strength, creativity, and connection. At Nxtra, we proudly welcome people from all backgrounds, celebrating the richness of identities, experiences, and viewpoints they bring. Whether shaped by age, gender, ability, orientation, ethnicity, or faith, each individual helps expand our understanding and deepen our impact. Together, we're building a culture where everyone feels seen, heard, and valued.

At the core of our approach lies a deep commitment to fairness, opportunity, and respect. Through inclusive practices and purposeful diversity goals, we're creating a workplace where every voice is valued, every contribution counts, and every individual is empowered to succeed.

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## **Driving Inclusion with Purpose and Accountability**

Inclusion isn't just something we aspire to, but it's something we act on every day. We've witnessed how the right opportunity can transform not just a career, but a person's entire journey. That's why programmes like NxtWave were created to open doors for women in roles where they've long been underrepresented and to pave new paths in spaces that once felt out of reach.

This commitment starts at the top. Our leaders don't just support inclusion they're accountable for it. By embedding DE&I goals into performance metrics, we ensure that progress isn't left to chance it's tracked, owned, and delivered at every level.

At the core of it all is a culture built on safety, respect, and trust. We stand firm in **our zero-tolerance policy on harassment**, guided by a strong Code of Conduct and supported by internal committees that handle every concern with care, confidentiality, and compassion.

Women's safety remains a top priority for Nxtra. Guided by our group-level Women Safety Policy, we've put in place real-world support systems from safe travel and late-hour work arrangements to an active ombudsperson committee all designed to foster a secure, respectful, and empowering work environment.





## ADVANCING GENDER DIVERSITY IN ENGINEERING: THE NXTWAVE INITIATIVE

Traditionally, the data center and engineering sectors have been male-dominated, and Nxtra reflected these industry trends. For years, female representation in technical roles remained low not due to a lack of talent, but limited opportunities. Despite strong overall employee engagement, the gender gap in engineering highlighted a key barrier to truly inclusive growth.

Recognising the need for meaningful change, Nxtra took a strategic step forward. The result was **NxtWAVE** (**Nxtra Women Advancing in Engineering**) a focussed initiative aimed at supporting and developing women engineers, strengthening gender diversity, and building a workplace where inclusion is not just encouraged, but embedded in the culture.

#### STRATEGIC PILLARS OF NXTWAVE

#### Targeted campus partnerships

As part of our efforts to build a diverse and locally rooted talent pool, we have formed strategic partnerships with select educational institutions. These collaborations are designed to attract more women into technical and engineering roles, ease the challenges of relocation, and strengthen our connection with local communities.

#### Holistic candidate development

NxtWAVE goes beyond technical skill-building. It emphasises adaptability, critical thinking, and alignment with Nxtra's core values ensuring that participants are not only job-ready but also culture-fit.

## Seamless onboarding experience

Clear role expectations and structured onboarding have fostered trust, enhanced confidence, and enabled new hires to integrate smoothly into Nxtra's engineering teams.



## NXTRA BY AIRTEL Sustainability Report 2025

#### INTRODUCTION

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#### **Post-Internship Transition**

The journey from trainee to professional at Nxtra is designed with purpose. Each individual is assessed through a structured evaluation that focusses on real-world project delivery, technical capabilities, and emerging leadership qualities. Those who excel don't just complete the programme they earn their place in Nxtra's operations and project teams, stepping confidently into long-term careers.

## Post-Joining: Structured Learning and Support

NxtWAVE ensures continuous growth and integration through a multi-layered support system:

## Development Area

## **Details**

## Peer-Driven Learning

Job shadowing, technical training, and exposure to real-time operations

## Continuous Evaluation

Weekly assessments to track knowledge retention and application

## Customised Support

Regular HR check-ins, mentoring, leadership engagement, and feedback loops

## On-Ground Participation

Hands-on involvement in site activities to deepen practical understanding



Hired 17 high-potential women Graduate Engineer Trainees as full time employees in Nxtra Reduced **attritionrelated costs** through stronger retention and engagement Created a **sustainable female talent pipeline** aligned with Nxtra's operational needs

Positioned the Company as a diversity-forward employer in the engineering sector



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Diversity at Nxtra isn't symbolic, it's a source of strength that powers bold ideas and inclusive progress. As the Company scales to power India's digital future, it does so with a clear belief: inclusive growth leads to stronger teams and smarter outcomes. From boardrooms to data centers, Nxtra is transforming how it hires, leads, and evolves. At the core of this change is its defining ethos – "Be Limitless". More than a guiding principle, it's a promise to embed Diversity, Equity, and Inclusion into every talent decision, making inclusion a foundational part of how the Company grows.

#### WIDENING THE TALENT LENS

To create truly inclusive teams, Nxtra starts at the source, redefining how it attracts, evaluates, and hires talent. Believing that diverse teams unlock richer ideas and stronger outcomes, the Company has reimagined its hiring practices to be more inclusive and intentional. This includes actively reaching out to underrepresented talent pools, with a dedicated focus on increasing the presence of women in engineering and leadership roles.

To make this vision real, Nxtra has put in place structured interviews, and standardised evaluation methods ensuring fairness, consistency, and transparency at every stage. These efforts go beyond compliance; they are designed to break down bias and build a recruitment process where talent is the only qualifier, and everyone has an equal chance to thrive.



Early-career mentorship programmes

Mid-level talent development initiatives

Executive readiness and succession planning with a DEI lens

#### THE NXTRA PROMISE

## **Hiring Differently**

Broadening access to opportunities

#### **Leading Inclusively**

Empowering voices across levels

### **Growing Sustainably**

Embedding equity into every step of the employee lifecycle

At Nxtra, we're not just shaping a workforce; we're creating a barrier-free workplace where talent thrives, leadership mirrors the world we live in, and every voice drives change. The future is not only digital, it is powered by inclusion, strengthened by diversity, and open to all.



#### OUR PATH FORWARD

As Nxtra continues to scale, our focus remains on fostering a workplace that is inclusive, agile, and future-ready. We will build on the momentum of initiatives like NxtWAVE and NxtLearn by expanding diverse talent pipelines, advancing digital learning, and deepening leadership development. With a strong foundation of ethics, equity, and employee empowerment, we are committed to shaping a culture where every individual thrives and where our people remain the driving force behind sustainable, long-term growth.

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## EMPLOYEE HEALTH AND WELL-BEING

GRI 2-8, 2-25, 403-1, 403-2, 403-3, 403-5, 403-6, 403-7, 403-8, 403-9, 403-10, 416-1, 416-2

## Prioritising safety, promoting wellness



Our strong commitment to the principle that Health and Safety Always Come First remains a

central pillar of our operations. Embedded in our Group Health and Safety Policy, this core value

shapes our approach across all levels of the organisation. We are dedicated to fostering a work environment where safety, security, and well-being are consistently prioritised and seamlessly

We aim to set the standard for excellence in Health and Well-being across all our sites. Through

strong safety measures and an empowered dedicated Environment, Health and Safety (EHS)

team, we've built a culture where people feel safe, supported, and valued placing their health and well-being at the core of our operations. FY25 numbers itself are depicting our strong commitment towards achieving our goal of Zero harm. We excelled in meeting our LTIFR targets,

integrated into our daily operations for everyone connected to our business.

achieving 0.09 against a target of 0.30.

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|      | <b>O</b> 11   | <br><u> </u> |     |

| Indicator                     | Employees | Workers |
|-------------------------------|-----------|---------|
| Number of fatalities          | 0         | 0       |
| TRIR                          | 0         | 0.01    |
| Number of training hours      | 1,868     | 60,413  |
| Number of recordable injuries | 0         | 01      |
| LTIFR                         | 0         | 0.096   |

| Indicators                                     | Operations | Projects  |
|--|------------|-----------|
| Safe Man Hours                                 | 4,204, 787 | 6,154,778 |
| Number of Site Induction<br>Completed          | 1,531      | 7,808     |
| Number of Topic-Focussed<br>Training Conducted | 1,961      | 2,697     |
| EHS Training Hours                             | 20,462     | 41,819    |
| Number of Emergency Drills & Exercises         | 96         | 18        |
| Worst Potential Severity Rate (WPS)            | 0          | 0.1       |

#### SDG LINKAGE





#### **SAFETY OBJECTIVES**

Zero – Harm

Zero – Fatalities

Zero - Disabling injuries

Zero - Injuries to members of the public

Zero – Harm to health

**EHS** risk assessment done across all core Data Centers.

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At Nxtra, we are committed to maintaining the highest standards of EHS across all our operations. We strive to create a safe and environmentally responsible workplace by identifying and mitigating risks, complying with all relevant regulations, and embedding EHS considerations into every stage of our business. Leadership commitment, employee training, and clear communication form the backbone of our approach. We actively promote resource conservation, pollution prevention, and responsible waste management, while empowering every individual to speak up against unsafe practices. Our EHS policy is regularly reviewed to remain aligned with evolving expectations and ensure it continues to protect people and the planet.

At Nxtra, leadership across functions goes beyond mere compliance, actively championing continuous improvements in health and safety. This commitment is reflected in several key initiatives, including the enhancement of workplace safety and wellness programmes, integration of EHS standards across partner operations, deployment of advanced technology and equipment at sites, and regular safety walkthroughs conducted by senior leadership. These efforts demonstrate a proactive approach to fostering a safe and supportive working environment.



#### **EHS MANAGEMENT SYSTEMS**

Nxtra's EHS management system serve as a structured framework to identify, manage and mitigate health, safety and environmental risks. Our EHS programmes are structured around internationally recognised standards.

#### ISO 14001

**Environment Management System** 

#### ISO 45001

Occupational Health and Safety Management System

#### **KEY COMPONENTS OF OUR MANAGEMENT SYSTEM ARE:**

#### **Policy and Leadership Commitment**

Our EHS Policy is regularly reviewed by Top management and communicated to all concerned. Policy cover all important aspect and commitment from top management to run an effective EHS management system.

#### Risk Assessment

At Nxtra routine and non-routine hazards are regularly monitored and risk assessed. Risk assessment for a non-routine hazards along with a detailed method statement is a standard practice at all our sites. MSRAs undergo review at multiple stages and receive approval from authorised personnel prior to commencement of work. Proactive risk identification and the implementation of control measures have contributed significantly to reducing incidents at the site.

## **Legal Compliance**

Complying to all the applicable local statutory EHS requirements is part of our policy commitment. Regular monitoring, timely submissions, inspections are ensured to achieve all the compliances.

## **Training and Awareness**

Competency enhancement is crucial to get the right job delivered in time bound manner. At construction site it is all the more necessary to check the competency and right skill set of workforce for the assigned task. We have detailed competency training procedure which requires identifying the skill/training need for each and every individual working at site. We deliver job-specific training through various formats classroom sessions, hands-on demos, and virtual modules. Annual training needs are mapped in advance, covering topics such as fire safety, emergency response, ergonomics, and wellness.

### **Monitoring and Measurement**

Monitoring and measurement for Nxtra has assured our performance only gets better each time. Use of KPIs, audit closures, inspections, compliance tracker etc. are some of the important parameter which get monitored and reviewed.

## **Incident Reporting and Investigation**

At Nxtra, we follow a transparent and prompt reporting mechanism for any incident happening at site. Involvement of cross-functional team and subject matter expert for carrying out investigation is always followed as part of incident management protocol. Lesson learnt are shared with each and every individual to ensure horizontal deployment of all the actions and prevent recurrence.

### **Continuous Improvement**

We leveraging feedback, audits, and technological advancements to enhance EHS performance.

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All stakeholders internal and external play a crucial role in driving safety across the organisation. In FY25, our key focus was on engagement initiatives to raise awareness of our EHS standards and practices.

## O1 Stakeholder Mapping & Prioritisation

Stakeholders were identified and categorised internal (employees, management, board) and external (suppliers, regulators, investors, communities, NGOs). Prioritisation was based on their influence, interest, and impact on EHS outcomes.

## O2 Clear Engagement Objectives & Metrics

SMART goals were set around key EHS KPIs such as reducing incidents, improving compliance, and enhancing emergency response times.

## Multi-Channel Dialogue & Communication

We maintained open, two-way communication through targeted channels:

- Internal: Town halls, Internal platforms, Mailers, Digital displays
- External: Webinars, Supplier meetings, Community outreach

Feedback was actively tracked and addressed to ensure consistency and responsiveness.

## Involvement in Decision-Making

Engaging stakeholders early in planning and execution uncovered risks, built ownership, and fostered trust. Key mechanisms included employee safety committees, management reviews, supplier audits, and EHS improvement workshops.

## 05 Recognise Contributions & Share Success

Recognition reinforced a culture of safety. Initiatives included:

- 'Top Star Performer' displays
- Rolling safety trophies (internal and partner teams)
- On-the-spot awards and committee-based monthly rewards
- Quarterly newsletter featuring zone-wise safety champions

## Monitor, Review & Report

Increased participation across forums reflected rising engagement. We tracked impact through session counts, quiz participation, reward distribution, and feedback. Regular monthly reviews helped sustain momentum and effectiveness.



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At Nxtra, leadership plays an active role in fostering a safety-first culture one where safe practices are not just protocols, but an integral part of daily work life. From senior management to on-ground teams, there's a shared sense of accountability and vigilance that drives our collective commitment to maintaining a safe and secure workplace.

Safety is a deeply held value across our organisation. We observe key events like Road Safety Week, National Fire Safety Week, International Yoga Day, and World Environment Day as part of our year-round calendar of safety campaigns. These moments offer opportunities to reinforce our safety culture in engaging and inclusive ways. For instance, a virtual leadership panel this year became a powerful platform for impactful messaging from senior leaders, leaving a lasting impression on employees. Activities such as safety-themed skits, quizzes, pledges, and competitions often tied to recognition and rewards further helped embed safety awareness across all levels of the workforce.

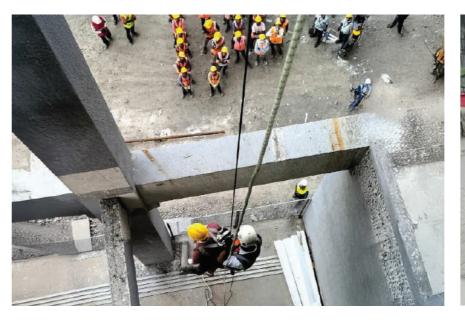
In FY25, we implemented innovative and proactive measures to mitigate seasonal and workplace risks. Initiatives included heat stress prevention through water stations, ORS distribution, and tailored training, alongside monsoon preparedness drives. Ergonomic awareness and behavioural safety campaigns were also conducted to reduce physical strain and reinforce safe working habits, helping to elevate overall site safety.

A key pillar of our ongoing efforts is the '**Topic of the Month**' campaign, an initiative that introduces a new safety focus each month, supported by newsletters, training sessions, inspections, and practical guidance. This has helped cultivate a more aware and safety-conscious workforce.

At Nxtra, health and safety are built into the fabric of our operations. By taking a proactive, risk-based approach, we continue to reduce recordable incidents and ensure a safer, healthier environment for all our people.









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At one of our facilities in Pune, located in a high-traffic zone with mixed employee and vendor vehicles, we launched an immersive Virtual Reality (VR) and driving simulator module to promote safer road behaviour. This pilot, part of our broader EHS and sustainability strategy, offers near real-life experiences to enhance road safety awareness.

The initiative aimed to improve road safety through experiential learning by simulating real-world driving conditions and unsafe behaviours. It focussed on reducing incidents and nearmisses by encouraging defensive driving and fostering behavioural change beyond theoretical knowledge. The programme also engaged employees during National Road Safety Week.

We partnered with a professional vendor to instal VR and simulator modules in a dedicated awareness zone at the Pune site. Employees experienced scenarios such as drunk driving,

distracted driving, speeding, wrong-side driving, pedestrian safety, and blind spots. Participants joined in batches, followed by debrief sessions for reflection and feedback. Active participants received appreciation tokens to encourage involvement.

The results were impactful: over 250 employees and contractors participated in two days, with an 80%+ improvement in road safety quiz scores and zero road incidents in the following quarter. Participants reported increased awareness and emotional connection to safe driving, with better recall than traditional methods. The initiative received positive internal feedback and improved traffic discipline and PPE compliance on-site. It also boosted EHS culture, employee morale, and enhanced our reputation for innovative safety practices.

This VR and simulator-based training transformed road safety education from passive to active learning, exemplifying Nxtra's commitment to advancing safety and sustainability through innovative solutions.



Safety remains the most critical of our EHS pillars. At Nxtra, it's more than compliance, it's a core value embedded in everything we do. We believe that all workplace injuries and illnesses are preventable, and this belief drives our proactive safety practices.



#### **Hazard Identification and Risk Control**

Before beginning any task, hazard identification is essential. All employees are trained to recognise and assess risks and implement controls in line with the hierarchy of control measures to prevent incidents.

### **Incident Reporting and Investigation**

Everyone at Nxtra from employees to partners, visitors, and customers is encouraged to report incidents, near misses, and safety observations. Our incident management process is structured to enable thorough investigation and ensure corrective actions are implemented.

## **Training and Capacity Building**

To build competency and confidence, we offer classroom sessions, virtual learning, and on-the-job training. These efforts ensure our workforce is equipped to perform tasks safely and efficiently.

#### **UPHOLDING WORKER WELFARE**

Guided by our 'Zero Injury' vision, Nxtra places the welfare of its workers at the core of its EHS strategy. Through our integrated EHS Manual and General Conditions of Contract, we address not just occupational safety, but also the broader health and welfare needs of our workforce. When assessing vendors, we evaluate their past performance in safeguarding worker welfare, extending our commitment to comprehensive facilities across all worksites – on-site and off-site alike.

In FY25, we achieved **6,154,778 safe man hours for Construction projects sites,** a testament to our rigorous implementation of safety measures and employee training.

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#### **CONTRACTOR MANAGEMENT PROCESS**

To ensure consistent safety performance across the value chain, we have established a structured contractor management process. All contractors are expected to align with Nxtra's EHS policies, local regulations, and best practices in worker welfare.

## Rigorous Contractor Prequalification and Onboarding

#### **Safety Screening**

Contractors are vetted based on their safety history, relevant certifications, and compliance with legal requirements.

#### Structured Induction

Site-specific orientations cover emergency protocols, facility rules, and each worker receives a personalised safety card for tracking training and violations.

## O2 Consistent Safety Training Across Sites

#### Standardised Curriculum

All locations follow a unified safety training programme to ensure consistency and build safety competence across the board.

### **Training Monitoring**

Weekly and monthly reviews help track compliance, supported by a mix of classroom, practical, and virtual training methods.

## Robust Safety Protocols and Compliance

#### **Procedural Controls**

Key systems such as work permits, lockout/ tagout, and incident reporting are implemented to minimise risks.

#### **PPE & Equipment Safety**

Mandatory use of PPE, regular inspection of tools, and safety signage in local languages enhance on-site safety.

## O4 Inclusive and Empowered Safety Culture

#### Leadership-Driven Culture

Senior leadership regularly demonstrates visible commitment to safety, reinforcing its importance throughout the organisation.

#### Accountability & Recognition

Safe behaviour is acknowledged and rewarded, while mechanisms like "stop work authority" empower all personnel to act on safety concerns.

By embedding safety practices into every stage of our contractor engagement and project execution, we build safer, more resilient workplaces. We also actively seek feedback from workers and carry out site inspections to validate the effectiveness of our welfare initiatives.

Through these efforts, we continue to foster a safe and supportive work environment – one that empowers individuals, protects communities, and reflects our enduring commitment to sustainability.







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## Case Study 1

DATUM FUEL STORAGE - A SAFER WAY TO STORE DIESEL

**Smart Fuel Storage for Safer Construction Sites** 

## 01 CONTEXT

During the initial phases of data center construction sites, diesel storage and handling were carried out manually using conventional metal drums. This traditional practice posed multiple EHS risks. Recognising the need for a safer, more sustainable solution, we undertook an initiative to revamp the diesel storage and dispensing system at the site.

## 02 OBJECTIVE

The main objectives of this initiative were:

- To enhance diesel storage safety and reduce spill-related environmental risks
- To ensure compliance with applicable EHS regulations and fire safety standards
- To adopt a compact and structured solution suitable for temporary project sites
- To prevent pilferage and improve diesel usage accountability
- To reduce manual handling and associated injury risks

## 03 ACTION TAKEN

**DATUM Diesel Storage & Dispensing System** was identified as a viable solution. The following actions were implemented:

- Procurement & Installation: A DATUM unit was procured and installed near the DG yard with appropriate secondary containment.
- Infrastructure Setup: A segregated area with proper signage, barricading, and spill response kit was established.
- Training & Awareness: Workforce and operators were trained on the new system operation, spill response, and safety protocols.
- Monitoring & Control: The system includes a secure locking mechanism and meter-based dispensing to control unauthorised usage and track consumption.
- Regulatory Alignment: Fire department norms and PESO (Petroleum & Explosives Safety Organisation) compliance were ensured in the installation.



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## Case Study 2

#### **COLOUR-CODED TOOL SAFETY SYSTEM**

## Flagging Safety - One Colour at a Time

## 01 CONTEXT

Large-scale construction sites typically operate with a high volume of tools, tackles, and lifting equipment in use daily. Ensuring the fitness and safety compliance of each item becomes a significant operational challenge, especially when there is a continuous influx and movement of such equipment. Manual records alone are often inadequate to ensure real-time compliance, posing risks to safety and productivity. To bridge this gap, our project site adopted a **Monthly Colour Coding System** for inspection and tagging of tools and tackles.

## 02 OBJECTIVE

The primary objectives of this initiative were:

- To implement a visual compliance system for tools, tackles, and lifting gear
- To establish a structured monthly inspection regime
- To enhance accountability and reduce risks associated with unfit equipment
- To simplify monitoring during site walkthroughs, audits, and inspections

## 03 ACTION TAKEN

The following systematic steps were undertaken to roll out the Monthly Colour Coding initiative:

- Colour Definition: One specific colour was designated for each calendar month (e.g., Red for June, Green for July, etc.).
- Inspection Planning: At the beginning of each month, a site-wide inspection drive was conducted covering all tools, tackles, and lifting equipment.
- Tagging System: All equipment that passed the inspection was tagged with the assigned monthly colour using cable ties or colourcoded labels.
- Non-Compliant Handling: Tools or tackles found unfit during inspection were quarantined for rectification or replacement.
- Communication & Training: Awareness sessions were conducted with contractors and workforce to ensure clear understanding of the system and their roles.
- Compliance Monitoring: Site EHS teams performed random checks to ensure tools in use carried the current month's tag.







### 04 OUTCOME

- **100% inspection** coverage of tools and tackles every month
- Zero incidents reported due to failure of unchecked lifting tools since implementation
- 30% reduction in time taken for audit readiness related to lifting equipment
- 30% improvement in compliance score during internal audits

The Monthly Colour Code System proved to be a cost-effective, scalable, and highly efficient method to maintain control over the vast inventory of tools and tackles at construction sites, ensuring better safety, compliance, and operational discipline.

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## COMMUNITY ENGAGEMENT

## **Enabling Change Where It Matters**



#### **SDG LINKAGE**









At Nxtra, social contribution is a core pillar of our sustainability vision – underscoring our deep commitment to creating shared value for both society and our business. We believe that meaningful progress begins with empowered communities. Through active participation in development initiatives, we strive to generate a meaningful and enduring impact beyond our core operations. Our sustained focus on community engagement reflects our dedication to advancing social well-being, aligning with our long-term purpose of building a more inclusive and resilient future.

## **HIGHLIGHTS**

8.8%

increase in CSR expenditure \_

Created positive impact for

Over 125,000 beneficiaries across 27 schools and other higher education institutions \_\_\_\_

₹61 million\*

CSR expenditure during FY25

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## **CSR VISION, MISSION & GOALS**



To help the underprivileged children and young people of our country to utilise their potential.



Committed to creating and supporting programmes that brings about sustainable changes through education and use of technology.



To improve the quality and accessibility at school level across rural India. To provide training and education opportunities to the youth of our country in order to make them employable.



## **OUR REACH**

We continue to strengthen our commitment to education and community development through programmes implemented by the Bharti Airtel Foundation through a wide geographical footprint.

## Satya Bharti School Programme

Currently operational in Rajasthan, Punjab, Haryana, and Uttar Pradesh.



## TheTeacherApp

Implemented across India.



Strategic focus areas







## Satya Bharti Adarsh Sr Sec **Scholarship Programme**

Active in Punjab.



**Higher Education - Partnering with** premier higher education institutes to provide scholarship support to students from less privileged backgrounds

Available Pan-India



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# CSR POLICY

At Nxtra, we are committed to contributing meaningfully to social and economic development through a structured and unified Corporate Social Responsibility (CSR) strategy, in line with Section 135 of the Companies Act, 2013. Our CSR initiatives focus on promoting education including special education and vocational training enhancing livelihoods, eradicating hunger and malnutrition, improving preventive healthcare and sanitation, and ensuring access to safe drinking water. All our CSR projects and programmes are implemented within India and are aligned with the focus areas outlined in Schedule VII of the Act.

Our CSR Committee, constituted in accordance with statutory provisions, evaluates and recommends projects either from Bharti Airtel Foundation or other eligible implementing partners that meet the criteria under the Companies Act. We ensure that each proposal clearly outlines the project scope, budget, implementation plan, timelines, and legal compliance. The Committee periodically monitors the progress of the initiatives/ projects towards which the CSR funds have been disbursed.

## Composition of the CSR Committee

Harjeet Singh Kohli Non-Executive Director Chairman – CSR Committee Ashish Arora Non-Executive Director Member – CSR Committee Kapil Modi Non-Executive Director Member – CSR Committee

Our Board of Directors approves the overall CSR budget annually, while the CSR Committee sanctions individual projects and contributions, including those made to applicable CSR funds. Any surplus generated from our CSR initiatives is reinvested into our CSR activities and does not form part of our business profits. We maintain a robust monitoring mechanism and evaluation framework to oversee the execution of projects and prepare an annual action plan that outlines the approved initiatives. This plan is regularly reviewed and updated in consultation with our Board to ensure continued effectiveness, legal compliance, and meaningful social impact.

## **Bharti Airtel Foundation: Driving Impact Through Education**

As the philanthropic arm of Bharti Enterprises, Bharti Airtel Foundation ("the Foundation") is committed to empowering underprivileged children and youth through access to quality education, with a strong focus on the girl child. Through the Satya Bharti School Programme, over 37,000 students (50% girls) receive free education across 164 rural schools in Rajasthan, Punjab, Haryana, and Uttar Pradesh.

The Quality Support Programme (QSP) has reached more than 4 lakh students in 1,000 government schools across 12 states/UTs, with select initiatives being scaled at district and state levels in partnership with education departments.

In FY24, the Foundation launched TheTeacherApp, aligned with NEP 2020, to build educator capacity at scale across India. Bharti Airtel Foundation supports access to higher education through scholarships at institutions including Plaksha University, J.C. Bose University, Satya Bharti Schools, and the Bharti Airtel Scholarship Programme. Over 700 students (51% girls) have benefited to date.



SUSTAINABILITY APPROACH

**ENVIRONMENTAL** 



### SOCIAL

- 50 Human Capital Management
- 57 Diversity, Equity and Inclusion
- **61** Employee Health and Well-being
- 69 Community Engagement

# **GOVERNANCE**

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# Initiatives

SATYA BHARTI SCHOOL PROGRAMME -Transforming rural education, empowering young minds

# **Reach and Impact**

6,400+

Students and teachers across 27 Satya Bharti Schools

#### States covered



- 1. Haryana
- 2. Punjab
- 3. Uttar Pradesh
- 4. Rajasthan

### **Beneficiaries**

Children from nearby villages, with a focus on girls

### SDG





# **About the Initiative**

Launched in July 2024, the Bharti Airtel Scholarship Programme is a transformative initiative designed to support talented students from a wide range of socio-economic backgrounds, particularly young women. This programme targets students enrolled in undergraduate and integrated technology-based engineering programs in the top 50 NIRF-ranked engineering institutes across India.

# What the Programme Offers

The Satya Bharti School Programme offers students a comprehensive educational experience, providing free uniforms, textbooks, notebooks, stationery, and mid-day meals to ease the financial burden on families. Education goes beyond the classroom, with a balanced mix of academic learning and extracurricular activities aimed at nurturing essential values, life skills, and self-confidence. The schools are staffed by local teachers who undergo professional training and continuous mentoring, ensuring students receive consistent, high-quality education rooted in their community context.

# Financial Relief for Rural Families - Via the Satya Bharti School Programme

The programme offers free education, uniforms, textbooks, notebooks, and mid-day meals, significantly reducing household expenses. From FY25, this support has been expanded to include free shoes, socks, and school bags. Since inception, families have saved an estimated ₹ 400 crore, based on NSS data adjusted for rural inflation highlighting the programme's financial impact on rural communities.



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### **ENVIRONMENTAL**



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**ANNEXURES** 

# Initiatives

BHARTI AIRTEL SCHOLARSHIP PROGRAMME - Promoting higher education for students from less privileged backgrounds

# **Reach and Impact**

29

Scholars supported

## **Target group**

Students from less privileged backgrounds who secured admission in top 50 NIRF-ranked engineering institutes, including IITs

### SDG





# **About the Initiative**

Launched in July 2024, the Bharti Airtel Scholarship Programme is a transformative initiative designed to support talented students from a wide range of socio-economic backgrounds, particularly young women.

This programme targets students enrolled in undergraduate and integrated technology-based engineering programs in the top 50 NIRF-ranked engineering institutes across India.

# **What the Programme Offers**

■ 100% financial support covering tuition, meals, and accommodation for the full course duration

- Laptop provided to each scholar in the first year
- Focus on students enrolled in undergraduate and integrated
   5-year engineering programmes at India's top institutions

## **Long-Term Vision**

By removing financial barriers, the programme aims to nurture the aspirations of talented students and equip them to become future-ready technology leaders. It reflects the Foundation's belief in education as a powerful enabler of opportunity and social equity.

Upon successful graduation and subsequent gainful employment, scholars will undertake to voluntarily support at least one student at the school or college level on a continuous basis.



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# Initiatives

TheTeacherApp (TAPP) –
An online platform dedicated to teacher
empowerment and school transformation

# **Reach and Impact**

119,000+ Registered users

#### States covered



## **Target group**

Teachers, school leaders, and educationists across the country

#### SDG





# **About the Initiative**

The Teacher App (TAPP) is a forward-looking digital initiative by the Bharti Airtel Foundation, designed to empower educators with the tools, knowledge, and support needed to transform classroom experiences and drive holistic school improvement.

### What the Platform Offers

- High-quality, research-backed content aligned with the National Education Policy (NEP 2020)
- Resources on modern teaching methods such as bagless days, project-based learning, and co-scholastic activities
- Access to self-learning modules, webinars, quick learning bytes, and parent-friendly resources
- Interactive elements including quizzes, opinion polls, certifications, competitions, and leaderboards
- A platform for educators to connect, share ideas, and celebrate success stories, fostering a vibrant professional learning community

# **Long-Term Vision**

TAPP aims to become a trusted companion for India's educators, encouraging continuous professional development and peer collaboration. By putting powerful, flexible learning tools in the hands of teachers, it helps foster better learning environments for students and drives meaningful, scalable change in classrooms nationwide.



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# Initiatives

SATYA BHARTI ADARSH SR SEC SCHOLARSHIP PROGRAMME – Promoting higher education for alumni from Satya Bharti Senior Secondary Schools

# **Reach and Impact**

255

Students supported

### **Beneficiaries**

Include alumni from Satya Bharti Adarsh Senior Secondary Schools in Amritsar, Ludhiana, and Sangrur districts of Punjab

### SDG





### **About the Initiative**

The Satya Bharti Adarsh Sr Sec Scholarship Programme, launched by Bharti Airtel Foundation, is designed to enable Class XII graduates from Satya Bharti Senior Secondary Schools to pursue higher education without financial constraints. This initiative reflects the Foundation's continued commitment to its students ensuring that education doesn't end at school.

# What the Scholarship Covers

- Full coverage of tuition fees and living expenses for students enrolling in recognised:
  - Undergraduate (UG) and Postgraduate (PG) degree programmes
  - Professional, vocational, integrated, ITI, and diploma courses across India

# **Long-Term Vision**

The programme aims to create a pathway for underprivileged rural youth to access meaningful higher education and unlock opportunities for economic independence, career development, and personal growth.

By standing beside students even after they complete school, the Foundation nurtures a culture of lifelong learning and aspiration.



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# Initiatives

J.C. BOSE UNIVERSITY SCHOLARSHIP
PROGRAMME – Promoting higher education for
girls from less privileged backgrounds

# **Reach and Impact**

25

Girl students supported

### **Beneficiaries**

Include students from less privileged backgrounds pursuing technical education

### SDG





### **About the Initiative**

The J.C. Bose University Scholarship Programme, supported by Nxtra through the Bharti Airtel Foundation, was launched to empower deserving female students enrolled in B.Tech programmes at J.C. Bose University of Science and Technology, YMCA, Faridabad. Established by the Haryana Government in 2009, the University is known for its industry-aligned technical education model, inspired by the German pattern of skill-based learning.

# **What the Scholarship Covers**

- Full tuition fee support for B.Tech students
- Recipients are recognised as Bharti Scholars, symbolising merit, ambition, and opportunity

## **Long-Term Vision**

This initiative is a step towards bridging the gender gap in engineering and technical education. By eliminating financial barriers, it enables young women to access quality higher education, paving the way for greater representation of women in STEM and nurturing future-ready professionals from underserved communities.



# SUSTAINABILITY APPROACH

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# Case Study

### **VOLUNTEERING AT SATYA BHARTI SCHOOL**

On Republic Day, 25 of our employees embarked on a meaningful CSR engagement trip to Rewari, Haryana an experience that went beyond traditional celebration. Organised as part of our ongoing efforts to strengthen its impact in rural education and development, the initiative provided employees with an opportunity to engage directly with the communities the Company supports. By spending time on the ground, volunteers participated in activities designed to uplift and inspire students, foster a sense of social responsibility, and thereby build stronger community connections among employees. The experience not only reinforced our commitment to inclusive development but also brought employees closer to the realities and aspirations of rural India through immersive, hands-on involvement.

# Background

As part of our ongoing commitment to rural development and education, employee volunteering is facilitated in both physical and virtual formats. These efforts aim to deepen grassroots engagement and build stronger bonds between employees and the communities we support.

# Objective

The initiative aimed to increase employee awareness and involvement in our CSR efforts by encouraging hands-on participation in community service. Celebrating Republic Day in this meaningful way not only deepened the connection between employees and the social causes Nxtra supports but also fostered team spirit and reinforced a culture rooted in purpose and shared responsibility.

# Actions Taken

- Volunteers engaged with students from two Satya Bharti Schools in Kurukshetra and Jhajjar districts
- Conducted storytelling, drawing sessions, cultural exchanges, and team games
- Distributed educational kits to school children
- Facilitated open discussions with community members on the significance of Republic Day
- Organised six additional virtual volunteering sessions

### Outcome

#### **Quantitative Results**

25

employees participated

Over 600 students engaged

100+

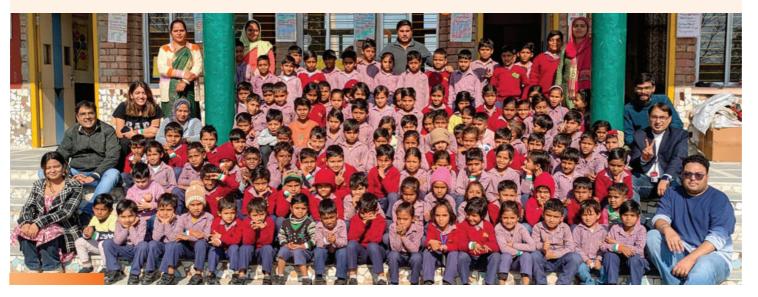
learning kits distributed

### **Qualitative Results**

- Increased employee satisfaction and sense of purpose
- Strengthened community relationships and Nxtra's local presence
- Boosted morale through meaningful engagement

# **Operational Impact**

The initiative significantly enhanced internal visibility of Nxtra's CSR efforts, creating greater awareness and appreciation among employees for the Company's social impact work. It also served as a catalyst for future engagement, inspiring employees to take ownership and lead similar volunteering initiatives, thereby embedding a deeper culture of purpose and community involvement within the organisation.



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# CORPORATE GOVERNANCE AND BUSINESS ETHICS

GRI 2-9, 2-10, 2-11, 2-12, 2-13, 2-14, 2-18, 2-20

# Driven by Integrity, Governed for Impact

Ethical governance remains a cornerstone of our sustainability strategy. Our ESG governance framework is designed as a fully integrated system, encompassing Board of Directors, senior management and the ESG Council, to ensure effective communication and diligent oversight of our sustainability initiatives. We recognise that sound governance is fundamental to maintaining financial integrity, reinforcing stakeholder confidence, and driving sustainable performance. By embedding ethical principles into our decision-making processes, we are committed to upholding the highest standards and delivering long-term value across all dimensions of our business.



**SDG LINKAGE** 



# HIGHLIGHTS

85.71%

of Non-Executive Directors (including one Independent director)\_\_\_\_

2.8 years

Average tenure of Board members

77%

Average Board attendance

SUSTAINABILITY APPROACH

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# **ESG GOVERNANCE STRUCTURE**





## **Board of Directors**

Nxtra's Board of Directors plays a pivotal role in shaping and guiding the Company's long-term vision. It provides strategic oversight, monitors organisational performance, and ensures robust governance in line with the highest standards. The Board comprises a diverse mix of experienced professionals, including one woman director among seven members, reflecting our commitment to inclusive and balanced leadership. By prioritising both sustainability and shareholder value, the Board, under the leadership of the Chairman, cultivates a strong governance culture, ensuring that all corporate initiatives are closely aligned with the Company's growth objectives.



Chaired by the CEO, the ESG Council is a key driver of our dedication to Environmental, Social, and Governance efforts. This council is tasked with shaping and endorsing ESG strategies, overseeing Company's key ESG initiatives & reporting thereof, and ensuring alignment of ESG objectives with the Company's strategic priorities. Through robust governance practices and transparent stakeholder engagement, the Council drives awareness and advances meaningful progress in our ESG initiatives.



Nxtra's ESG function plays a vital role in driving sustainability efforts and managing the development and disclosure of sustainability and climate risk reports for external stakeholders. Key responsibilities include:

- Collaborating with departments to conduct scenario analysis.
- Identifying risks and opportunities supported by site-level teams.
- Developing an ESG roadmap with KPI targets and proposed initiatives in partnership with the ESG Council.
- Monitoring ESG performance, collecting data across functions, and reporting progress to the ESG Council.

The ESG function also works closely with sitelevel teams to identify and eliminate climaterelated risks and opportunities, ensuring management agreement on mitigation plans and compliance with national and internal ESG disclosure frameworks.



**Cross-functional Teams (CFTs)** 

At Nxtra, cross-functional teams (CFTs) are composed of members from core departments, including Environmental Health and Safety (EHS), Human Resources, Finance, Operations, Corporate Secretarial, Project Management, and Data Security. Steering member of each team as a Single Point of Contact (SPOC) for designated material topics, driving the execution of ESG initiatives that align with the Company's broader strategic goals. Their responsibilities also include managing climate-related risks and opportunities at the facility level.

Key responsibilities include:

- Driving the execution and monitoring of ESG initiatives specific to their assigned material issue.
- Implementing control and mitigation measures to manage climate-related risks effectively, ensuring proactive management and minimising potential impacts.
- Collecting ESG-related data, including climate change metrics and reporting their findings to the sustainability team. This data plays a crucial role in evaluating the effectiveness of implemented initiatives and tracking the progress of ESG goals.

# **BOARD OF DIRECTORS - STRUCTURE AND COMPOSITION**



**SUSTAINABILITY APPROACH** 

**ENVIRONMENTAL** 

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1234567

**Ashish Arora** Whole-time Director and CEO





Gary Wojtaszek Independent Director 123567



Harjeet Singh Kohli Chairman, Non-Executive Director























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Neeraj Bharadwaj Non-Executive Director



**Sharat Sinha** Non-Executive Director













Vidyut Gulati Non-Executive Director





Non-Executive Director











Audit Committee

Corporate Social Responsibility Committee

Nomination and Remuneration Committee

Committee of Directors

- 1 Strategic leadership and management experience
- 2 Governance
- 3 Industry and sector experience
- 4 Financial and Risk management
- 5 Human capital management
- 6 Sustainability and ESG
- 7 Global business/international expertise



**M 1 3 4 5 6 7** 



# SUSTAINABILITY APPROACH

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### **Board Committees**



#### **Audit Committee**

Oversees financial reporting process, internal financial controls, and reviews financials and related party transactions.



#### **Nomination and Remuneration Committee**

Oversees Board remuneration, evaluation and development programmes, and the Company's key human resource matters, including talent management; leadership, succession planning and Long-Term Incentive framework.



### **CSR Committee**

Engaged in evaluation, monitoring, and recommending the CSR proposals and policy to the Board, among others.

# STRUCTURED LEADERSHIP ROLES FOR EFFECTIVE GOVERNANCE

To uphold a strong governance structure, we clearly distinguish the responsibilities between the Non-Executive Chairman and the Whole-time Director & CEO. The Chairman's role is centreed on shaping long-term strategy, building strategic partnerships, developing leadership, identifying global growth avenues, and ensuring that the Board operates with integrity and effectiveness. The Whole-time Director & CEO is tasked with driving the execution of strategic plans and managing the Company's financial and operational outcomes.

# BOARD EVALUATION AND GOVERNANCE OVERSIGHT

At Nxtra, we believe that strong governance begins with self-reflection and continuous improvement. To uphold our commitment to transparency and high-performing leadership, Nxtra partners annually with a leading independent consultancy to conduct a comprehensive Board evaluation using an advanced digital platform.

Guided by the Nomination and Remuneration Committee, we have developed a robust and structured evaluation framework. This includes clear processes, objective criteria, and detailed questionnaires designed to assess the effectiveness of the Board as a whole, its Committees, and individual Directors – covering the Chairman, Whole-time Director & CEO, and Independent Directors.

Throughout the year, each Director engages in confidential assessments spanning all tiers of governance. The insights are consolidated by the external consultant and shared with the Board through the Company Secretary. The outcomes are reviewed first by the Nomination and Remuneration Committee, then discussed

in relevant Committee meetings, and ultimately presented at a full Board meeting for final deliberation.

This transparent and participative approach not only aligns with global best practices but also reinforces our dedication to continuous governance enhancement, accountability, and principled leadership across every level of the organisation.

### **BOARD-LED ESG GOVERNANCE**

At Nxtra, the Board plays a central role in advancing our ESG agenda. Drawing on a wide range of professional experience, its members provide strategic direction and ensure ESG priorities are embedded across the Company's broader business strategy. The Board actively engages in evaluating sustainability initiatives, tracking progress on ESG commitments, and aligning these efforts with long-term organisational goals. Through its emphasis on accountability and sustainable practices, the Board strengthens our dedication to ethical governance and the delivery of enduring value to all stakeholders.

The Board's key responsibilities regarding ESG encompass:

- Supervising significant ESG risks, opportunities, and their mitigation strategies.
- Endorsing and formalising ESG goals, including periodic strategy action plans.
- Regularly assessing the performance of ESG action plans and strategies.
- Evaluating initiatives designed to fulfill ESG objectives and obligations.

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# REGULATORY COMPLIANCE

GRI 2-15, 2-16, 2-23, 2-24, 2-26, 2-27, 205-1, 205-2, 205-3, 206-1

# **Enabling Digital Infrastructure Through Compliant Practices**



HIGHLIGHTS

A workflow-based compliance monitoring system

to assign, track, and record all compliance and assessment-related activities

100% stakeholders attained annual certification on the Code of Business Conduct

### SDG LINKAGE



At Nxtra, compliance management is integral to our commitment to responsible and ethical business practices. We uphold the highest standards of regulatory adherence, ensuring our operations align with applicable laws, industry norms, and internal policies. Through robust governance frameworks, regular audits, and employee awareness programmes, we foster a culture of integrity and accountability. Our proactive approach to compliance not only mitigates risks but also strengthens stakeholder trust and supports sustainable growth.

At Nxtra, compliances are managed through our Compliance Monitoring System (CMS), a digital, workflow-driven risk assessment platform. CMS provides a structured and scalable approach to meeting legal and regulatory obligations, ensuring consistent adherence across all business units.

The system is deeply embedded in our operations, enabling real-time compliance tracking, continuous internal audits, and effective performance measurement. It plays a key role in building organisational resilience by promoting proactive risk management. By aligning with broader business systems, the CMS streamlines compliance processes, enhances transparency with stakeholders, and improves overall operational efficiency.

# SUSTAINABILITY APPROACH

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# From Monitoring to Meaningful Impact

### **Centralised Repository**

Serves as a single source of truth for all compliance-related information, including policies, procedures, regulatory requirements, and documented evidence.

### **Automated Monitoring**

Facilitates timely tracking of regulatory changes and compliance deadlines, significantly reducing the risk of oversight or non-compliance.

#### Risk Assessment

Enables early identification of compliance gaps and helps prioritise mitigation actions based on potential impact and urgency.

### **Reporting & Analytics**

Offers data-driven insights through dashboards and reports, supporting leadership with informed, strategic decision-making.

# **Workflow Management**

Streamlines end-to-end compliance activities such as audits, policy reviews, and incident management through automated, standardised workflows.

## **Training & Awareness**

Supports employee engagement through structured training modules and ongoing awareness initiatives to embed a compliance-first mindset across the organisation.

# **Managing Conflicts of Interest**

We view the management of conflicts of interest as essential to maintaining trust. Clear policies are in place to identify, disclose, and mitigate any such risks, with regular training and awareness sessions conducted across teams. This helps reinforce a culture of ethical responsibility and transparency, strengthening our relationships with employees, investors, and partners.

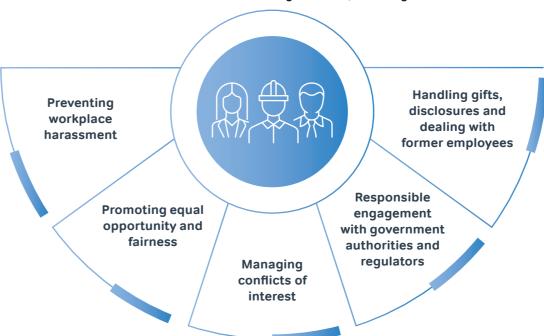
# Promoting a Culture of Ethics and Integrity

We follow the Group-wide Code of Conduct (CoC), modelled on Bharti Airtel's standards, to guide ethical decision-making at every level. It lays down clear expectations for behaviour across our workforce, ensuring fairness, respect, and integrity in all interactions. All employees undergo mandatory training on the Code, with additional awareness campaigns and leadershipled communications reinforcing these values throughout the year.

It also sets robust standards for anti-bribery and anti-corruption, applicable to employees, directors, subsidiaries, and all business associates including contractors, vendors, and service providers. We maintain a zero-tolerance policy towards corruption, supported by a transparent whistleblower mechanism that enables stakeholders to confidentially report any suspected violations.

We promote openness and trust through accessible reporting channels, open-door leadership, and clearly defined escalation processes. Integrity is seen not as a standalone value, but as a daily practice supported by systems and culture alike.

## The CoC covers a wide range of areas, including:



# **Ethical Expectations Beyond Our Workforce**

To extend our ethical commitments across the value chain, Nxtra has developed a dedicated Code of Conduct for Business Associates. This policy sets clear expectations on professional behaviour, market conduct, and business ethics ensuring our partners reflect the same values we uphold internally.

The Business Associate Code also addresses key ESG principles, including:

Respecting human rights
 Ensuring safe and healthy workplaces
 Protecting data privacy

These standards are aligned with international frameworks such as ILO conventions and modern slavery laws, and are binding for all third-party associates who work with us.

or involuntary labour

# NXTRA BY AIRTEL Sustainability Report 2025

### INTRODUCTION

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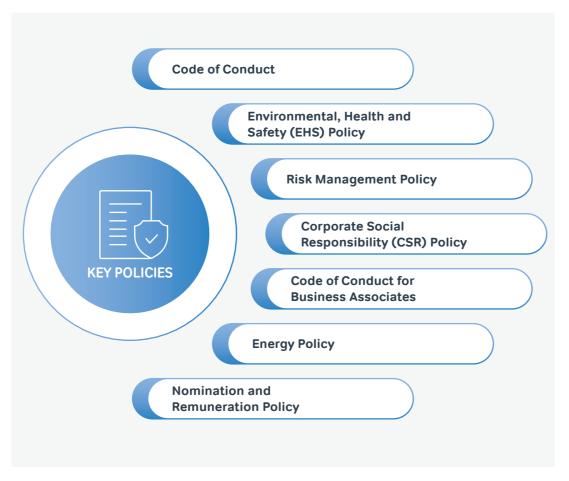
**ANNEXURES** 

# **Governance and Policy Framework**

Our governance ecosystem is supported by a set of well-defined policies that are regularly reviewed to reflect both global best practices and local regulatory developments. These policies form the backbone of our compliance posture and are designed to evolve alongside our business.

Together, they provide clear direction on operational integrity, environmental stewardship, ethical behaviour, and stakeholder responsibility. Our compliance teams track changes in law, manage internal alignment, and ensure accurate and timely disclosures across all reporting frameworks.

These include, among others:



# **Engaging with Regulators**

We view regulatory engagement not merely as a compliance requirement, but as a valuable opportunity to actively influence and advance the future of responsible infrastructure and environmental standards. Our teams actively engage in industry forums and consultations, providing insights and feedback that represent our on-ground experience and long-term sustainability goals.

We affirm full compliance with all applicable environment health and safety regulations in jurisdiction where we operate. When it comes to regulatory compliances it is important to keep updating the list of latest amendments and their applicability. We ensure this through regular

updates from various key sources and spreading awareness to all concerned stakeholders in timely manner. Few critical regulations to name are:

- Environment protection (air, water) e.g. adherence to clean drinking water, clean air act requirement, monitoring air emission and so on.
- Compliance to consent conditions for our sites.
- Hazardous waste management rules storage and disposal of hazardous waste as defined in the act.
- Occupational and Health and Safety regulations – Track Incident as per OSHA definition and monitoring rates for its severity and loss time injuries and audit results.



# **NXTRA BY AIRTEL** Sustainability Report 2025

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demonstrated not just in preventing lapses,

but in how swiftly and responsibly we respond when they occur. Even the most robust systems may face occasional challenges but our commitment to transparency, accountability, and continuous improvement sets us apart. We follow a structured and transparent approach

to addressing any breaches or non-compliance

issues, guided by globally recognised standards

such as ISO/IEC 27001, SOC 2, and PCI-DSS.

**Responding to Non-Compliance** 

At Nxtra, we believe that true resilience is

We maintain a confidential whistleblower mechanism that is accessible to all stakeholders. Investigations are conducted using standardised protocols by cross-functional teams from compliance, legal, and security. Where required, disciplinary action is taken in accordance with internal policies, with oversight from our Compliance Governance Committee.

We view every incident as a chance to learn and improve. Through post-incident reviews, root cause analysis, and retraining, we work to prevent similar issues from happening again and to build greater resilience across the organisation. Regular reporting and audit preparedness help us stay accountable, not just in theory, but in real practice.

At Nxtra, we pride ourselves on maintaining a strong portfolio of globally recognised certifications that reflect our commitment to quality, security, and sustainability. Our data center designs comply with TIA 942 and Uptime standards, and our services are certified under ISO 20001 and ISO 9001. We prioritise environmental and occupational safety through ISO 14001, ISO 45001, and ISO 50001. For business continuity, we adhere to ISO 22301 and are a MEITYempanelled CSP provider. Our security framework includes ISO 27001, PCI DSS, SOC 1 & 2 Type II, and ISAE-3402 Type II certifications.

DESIGN **OBJECTIVES** 

> **TIA 942** Uptime

**ENVIRONMENT AND SAFETY OBJECTIVES** 

> ISO 14001 ISO 45001 ISO 50001

SERVICES **OBJECTIVES** 

ISO 20001 ISO 9001

**BUSINESS CONTINUITY OBJECTIVES** 

> ISO 22301 MEITY empanelled **CSP** provider

**SECURITY OBJECTIVES** 

ISO 27001 SOC 1 & 2 Type II **PCI DSS** ISAE-3402 Type 11



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# SUSTAINABLE SUPPLY CHAIN MANAGEMENT

GRI 308-2, 403-4, 411-1, 413-1, 413-2, 414-2

# Partnering Responsibly, Delivering Sustainably



SDG LINKAGE







At Nxtra, we believe that sustainability doesn't begin within the walls of our data centers, it starts at the source. From the very foundation of our operations, we are reimagining the way supply chains contribute to a sustainable future. Our approach is rooted in responsibility, collaboration, and continuous improvement, creating a ripple effect that touches every stakeholder along the value chain.

# **HIGHLIGHTS**

99%

local procurement.

98%

of the strategic suppliers covered in ESG awareness and training programmes \_\_\_\_

100%

of suppliers have signed the Supplier Code of Conduct

Considering safety criteria in partner evaluation for all RFPs above

5 million

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Our supply chain strategy is more than a procurement process; it's a blueprint for shared progress. Guided by Environmental, Social, and Governance (ESG) principles, Nxtra has embedded ethical business conduct and human rights considerations into its supplier engagement framework. This vision is brought to life through systematic audits, strategic sourcing practices, and deep integration with Airtel Group's sustainability agenda.

A Strategy Built on Responsibility

Together with our suppliers and partners, we're working not just to meet compliance requirements, but to elevate standards, ensuring that sustainability is not an afterthought, but a built-in priority.

# **Empowering Local Economies Through Responsible Sourcing**

Sustainability always begins at the local level. We always prioritise SMEs & MSMEs in our procurement practice for fostering economic inclusion and agility. By building resilient networks of indigenous vendors, we are not only streamlining operations but also nurturing livelihoods and reinforcing community trust.

We recognise the challenges MSMEs face; limited ESG awareness, outdated infrastructure, financial constraints, and skill gaps. We, however, take this as a huge opportunity to help them embrace their strengths, as it is a win-win proposition considering cost-efficiency, co-creation, and the ability to create meaningful local impact. Our support extends beyond contracts; we invest in capability-building and knowledge-sharing to strengthen ESG maturity across our supply chain.

# Aligning Our Suppliers to Shared ESG Goals

Nxtra ensures that all supplier partnerships are anchored in our Supplier Code of Conduct, which reflects our core ESG commitments:

# **Human Rights**

Upholding labour laws and eradicating unfair practices.

# **Workplace Safety**

Enforcing health and safety standards to protect lives.

### **Environmental Management**

Promoting carbon reduction and sustainable resource use.

## **Data Privacy**

Ensuring compliance with data protection norms.

# **ESG Adoption**

Encouraging vendors to adopt and promote similar standards across their own supply chains.

This alignment is reinforced through rigorous due diligence, where suppliers are assessed not only for legal and commercial readiness but also for ESG performance, risk mitigation, and regulatory compliance.

# **Data-Driven Assessment and Monitoring**

Nxtra adopts a data-driven approach to supplier evaluation, using predefined parameters and weighted scoring models to assign baseline ESG scores (~50) and track performance year over year.

Our continuous monitoring framework includes:

Routine compliance surveys

ESG risk evaluations

Corrective action plans with structured follow-ups

These mechanisms help us to ensure accountability and create a clear pathway for improvement, one that's transparent and collaborative.

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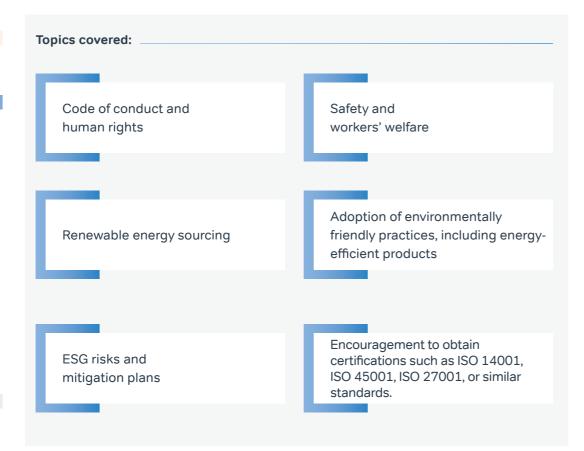
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# **Engagement Through Education: Training and Awareness**

At Nxtra, we believe that a sustainable supply chain begins with informed and empowered partners. That's why we actively engage our suppliers through focussed workshops, hands-on training sessions, and awareness programmes centred on health and safety, environmental responsibility, and ethical business practices.

In FY25, we conducted a series of targeted sessions designed to align our suppliers with Nxtra's broader sustainability vision. These engagements provided practical tools, clear frameworks, and actionable insights to help them implement ESG initiatives and confidently report their progress. By investing in our partners' capabilities, we not only build their confidence but also reinforce the resilience and integrity of our entire supply chain.



# **Elevating Supply Chain Sustainability: The First ESG Supplier Assessment**

A robust supplier assessment process is critical to ensuring that sustainability is embedded at every level of the value chain. It provides a clear view of supplier performance, highlights areas for improvement, and drives accountability on key ESG parameters. For Nxtra, it also serves as a powerful lever to promote consistency, compliance, and long-term value creation across the ecosystem.

In collaboration with the Bharti Airtel Group, Nxtra conducted its first-ever Supplier Sustainability Assessment in FY25. This milestone initiative focussed on evaluating strategic suppliers identified based on emission intensity, service criticality, and transaction volumes through a structured and comprehensive framework. The assessment covered:

Process maturity and ESG readiness Adoption of green building and energyefficient practices (particularly for Design & Build projects)

ISO certifications and annual ESG performance scoring Compliance with statutory regulations (such as ESI, PF, Gratuity)

This rigorous evaluation has significantly enhanced visibility into supplier sustainability practices, enabling more informed decision-making and targeted support. More importantly, it has reinforced Nxtra's position as a frontrunner in building a responsible, future-ready digital infrastructure ecosystem.



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# Strengthening Contractor Evaluation Through Rigorous Health & Safety Compliance

At Nxtra, safeguarding people and the environment is integral to how we build and operate. We embed Health & Safety (H&S) compliance as a core pillar in our contractor evaluation process, ensuring that every project partner meets the highest standards of safety, accountability, and regulatory integrity.

### Clear Standards from the Start

We begin each contractor engagement by clearly defining task-specific requirements, including detailed health, safety, and compliance criteria – setting transparent expectations from the outset.

# Driving a Culture of Safety and Sustainability

By integrating H&S compliance into every stage of contractor selection, we uphold a safe, resilient, and sustainable work environment across our operations. This disciplined approach reinforces our commitment to responsible infrastructure development and stakeholder well-being.

# Structured Participation and Qualification

Interested contractors respond with formal submissions, which are carefully reviewed for completeness and alignment with our pre-qualification benchmarks. Only those meeting our defined thresholds advance in the process.

# **Expert-Led H&S Review**

Our internal H&S team conducts a focussed assessment of shortlisted candidates. If gaps in compliance are identified, we provide targeted feedback or request additional documentation – ensuring only fully compliant partners proceed to project execution.

# **A Supply Chain with Purpose**

At its core, Nxtra's supply chain transformation is driven by a deeper purpose, one that goes beyond operational efficiency to create a lasting, positive impact. By embedding sustainability into every aspect of sourcing, supplier engagement, and operations, we are not just optimising performance we are shaping a supply chain that upholds integrity, empowers communities, and anticipates the future. Resilient, inclusive, and ethically grounded, our supply chain reflects Nxtra's unwavering commitment to responsible growth and long-term value creation.

As we move forward, our suppliers remain key allies on this journey, empowered, aligned, and ready to grow with us in shaping a more sustainable digital future.



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# SYSTEMATIC RISK AND CRISIS MANAGEMENT

**GRI 2-22** 

# Future-Ready, Risk-Resilient



**SDG LINKAGE** 



# **HIGHLIGHTS**

Comprehensive climate-related risk mapping and mitigation planning has been completed for all core data centers

Maintained ISO
22301 Business
Continuity
Management System
(BCMS) certification for all core
data centers

At Nxtra, we have established a comprehensive risk management framework designed to address strategic, legal, financial, operational, and environmental risks. A core component of our ESG strategy and business continuity planning is the proactive identification and evaluation of potential threats to our operations. Through rigorous assessment and implementation of actionable mitigation measures, we strive to ensure operational resilience and the security of our business ecosystem.

Our approach to risk and emergency management aligns with global best practices, including ISO standards and the TCFD framework, and is integrated and structured around a threestep process: **identification**, **mitigation**, **and continuous monitoring & reporting**. This enables us to anticipate potential disruptions and respond with agility and effectiveness in times of crisis.

In line with our commitment to responsible business practices, Nxtra also places significant emphasis on addressing environmental, social, and governance (ESG) risks. Our structured framework supports the identification and management of key environmental challenges, enabling us to integrate sustainability into our operations. By aligning with global standards such as GRI, TCFD and TNFD, and adopting sustainable practices, we seek to contribute positively to the environment and communities in which we operate, while reinforcing the long-term resilience of our business.

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## **Risk Identification Process**

#### **Risk Identification**

A comprehensive evaluation of the internal and external business environment is undertaken to identify potential risk exposures across the organisation.

#### **Risk Assessment**

Risks are systematically classified based on their probability of occurrence, potential impact on operations, and inherent nature.

### **Risk Quantification**

Robust and objective methodologies are developed to measure and quantify identified risks, enabling consistent evaluation.



# **Risk Mitigation Process**

#### **Risk Prioritisation**

Key risks are listed and prioritised to ensure focussed management attention and efficient allocation of resources.

### **Strategic Risk Planning**

Detailed action plans are formalised and agreed upon to address and manage critical risks effectively.

### **Budget and Resource Approval**

Necessary approvals are secured for the allocation of financial and operational resources to support the risk management framework.

# **Mitigation Planning**

Clear ownership is established by assigning responsibility to specific roles for the execution of defined risk mitigation strategies.

### **Issue Escalation**

Significant risk issues are reported to the Audit Committee to ensure appropriate oversight and timely resolution.



# **Monitoring and Reporting Process**

# **Monitoring and Review**

Mitigation plans are periodically reviewed to assess progress, evaluate gross and net exposures, and implement corrective actions where required.

### **Progress Reporting**

Ongoing updates on risk mitigation activities and outcomes are communicated to the Board and Audit Committee for strategic alignment.

# Strategic Approach to Addressing Environmental Issues

At Nxtra, we recognise that effectively managing environmental, social, and governance (ESG) risks is essential to safeguarding our operations and maintaining strong relationships with our stakeholders. We take a proactive and considered approach, guided by a clear framework that helps us identify and address key environmental challenges. By embedding sustainable practices into our day-to-day operations and aligning with internationally recognised standards (ISO 14001, and the UN SDGs), we strive to act responsibly and make a positive impact on the environment and the communities we serve.



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# **Risks and Mitigation Approaches**



| Risk   | Impact  | Mitigation Approach   |
|--|---|---|
| Increased Carbon<br>Emissions from Business<br>Expansion                         | Difficulty in meeting emission reduction targets; potential reputational risks and long-term sustainability challenges.                         | Transitioning to renewable energy, utilising open access procurement, and implementing low-emission technologies to reduce the overall carbon footprint.  |
| Extreme Climate Conditions (e.g., floods, seismic activity, cyclones, heatwaves) | Infrastructure degradation;<br>supply chain disruptions;<br>interruption of maintenance<br>activities; increased safety risks<br>for personnel. | Regular infrastructure reviews and action plan implementation; structural retrofits to withstand extreme conditions; enhancing data center resilience through heat-tolerant designs; fostering collaboration among stakeholders for coordinated climate response. |



| Risk                               | Impact  | Mitigation Approach   |
|------------------------------------|---|---|
| Extreme Heat<br>Events             | Overheating of cooling systems, risk of equipment failure, and potential service disruptions. | Deployment of advanced cooling technologies and climate-resilient infrastructure to maintain operational stability.                           |
| Flooding and Heavy<br>Rainfall     | Infrastructure damage,<br>disrupted power supply, and<br>restricted site access.              | Enhanced flood defenses, elevated site designs, and robust drainage systems.  |
| Storms and<br>Cyclones             | Physical damage to facilities, supply chain interruptions, and network outages.               | Site-specific risk assessments, resilient infrastructure design, and emergency preparedness plans.  |
| Water Scarcity                     | Limited availability of water for cooling and other operational needs.                        | Adoption of water-efficient cooling systems and exploration of alternative technologies like air-based cooling and hydrogen-ready fuel cells. |
| Cross-Cutting Risk:<br>All Hazards | Operational downtime, increased maintenance costs, and reputational risks.                    | Multi-layered resilience planning including crisis protocols, regular emergency drills, and stakeholder collaboration.                        |

# **Risks and Mitigation Approaches**

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Geopolitical and Social

Disturbances (e.g., civil

strikes)

unrest, pandemics, labour

#### **Mitigation Approach** Impact Continuous stakeholder Elevated operational uncertainty; potential engagement in operational regions; ongoing evaluation disruptions to business of socio-political landscapes continuity. to adapt mitigation strategies

proactively.

# GOVERNANCE

Adoption and Innovation

| Risk   | Impact  | Mitigation Approach  |
|--|---|--|
| Limitations in Risk<br>Controls and Compliance<br>Structures | Risk of inefficiencies, financial losses, reputational damage, and manpower challenges. | Strengthening compliance with statutory and regulatory authorities; leveraging the Compliance Monitoring System (CMS) to track and assign compliance tasks, fostering crossfunctional accountability and transparency. |
| Delayed Technological  | Reduced operational efficiency;   | Embedding digital  |

increased costs; diminished

evolving customer expectations.

agility; misalignment with

transformation into core business strategy; prioritising innovation to enhance service delivery and ensure long-term competitiveness.

In line with our commitment to transparency

and resilience, Nxtra has conducted a comprehensive physical climate risk assessment following the Task Force on Climate-related Financial Disclosures (TCFD) framework. This assessment evaluates the potential impacts

of climate-related hazards on our data center infrastructure and operations, ensuring that our risk management strategies remain robust and forward-looking. For more details refer the Climate Change section.

### MEASURES FOR FUTURE-PROOFING

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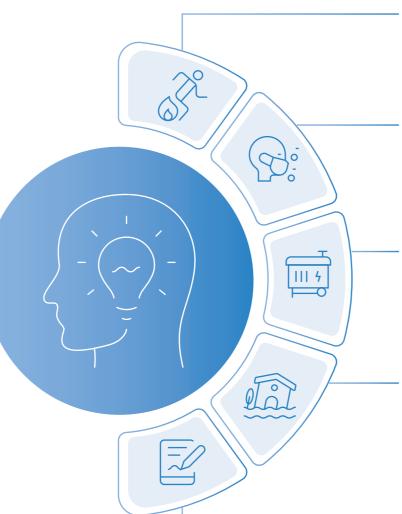
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### Fire Evacuation Drills

To ensure rapid and effective response in the event of a fire emergency, Nxtra conducts quarterly fire evacuation drills across all data centers. These drills are designed to assess response times, refine evacuation procedures, and strengthen staff preparedness, thereby reinforcing our commitment to employee safety and operational integrity.

# **Diverse Emergency Drills**

In addition to fire drills, Nxtra implements a wide range of emergency simulation exercises. These include scenarios such as infectious disease outbreaks (e.g., COVID-19), first-aid emergencies, and hazardous incidents like fuel spillages. Each simulation is meticulously evaluated to test containment strategies, quarantine protocols, and location-specific safety measures, ensuring a comprehensive approach to emergency readiness.

## **Business Continuity Planning (BCP)**

Our Business Continuity Planning framework incorporates preventative maintenance and monitoring tools to minimise disruption. This includes regular thermographic scans of outdoor equipment, particularly diesel generator (DG) units, to detect abnormal temperature fluctuations. Preventive maintenance such as coolant replacement further ensures optimal performance of critical infrastructure.

# **Flood Management Strategies**

Nxtra's data centers are strategically designed to counteract flood-related risks. Facilities are built with elevated plinths and floors, as demonstrated by Mumbai DC and Chennai DC2. In addition, data halls are often located on upper levels to reduce exposure to water ingress, particularly in flood-prone regions. These architectural interventions form a key element of our climate-resilient infrastructure strategy.

# **Supplier Agreements and Compliance Protocols**

As part of our resilience strategy, we maintain strict supplier agreements and compliance procedures. Transformers undergo biannual inspection and maintenance to uphold reliability. Furthermore, we ensure the environmentally compliant disposal of lubricating oil – an operational byproduct through defined processes aligned with regulatory standards.



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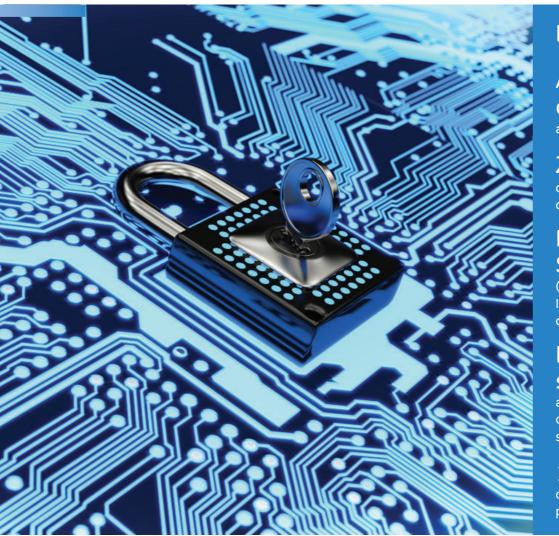
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# DATA SECURITY AND PRIVACY

GRI 418-1

# Security That Goes Beyond Compliance



# **HIGHLIGHTS**

Adopted seven layers of physical security across all core and hyperscale DCs.

# Zero breaches

of information security or cybersecurity occurred. \_

# Maintained Data Security Standard

(PCI DSS), SOC 1 & SOC 2 Type II (including SSAE) for all core data centers.

# Information security risk

assessment and recovery strategy, certified by ISO 27001, 22301 standards.

# 100%

of employees underwent training on phishing awareness.

### **SDG LINKAGE**





# AN APPROACH ROOTED IN RESPONSIBILITY

In a digital-first world, where data is currency and trust is its backbone, Nxtra sees data security not as a function but a foundational commitment. As trusted custodians of critical and sensitive information from enterprises and institutions, our approach is guided by a clear and uncompromising mandate to protect, preserve, and proactively prevent, upholding the highest standards of data integrity and resilience.

Every enterprise entrusting us with their data places their confidence, operations, and reputation in our hands. At Nxtra, we view this responsibility not merely as a duty, but as a fundamental commitment. Our data centers are designed as secure digital fortresses, with security embedded at every layer from physical safeguards to continuous 24/7 monitoring. Guided by a clear and unwavering mandate, we protect, preserve, and proactively prevent risks, consistently upholding the highest standards of data integrity and resilience.

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# A FRAMEWORK ANCHORED IN INTEGRITY

The twin pillars of Information Security and Privacy form the core of Nxtra's approach. Our strategy begins with a deep understanding of evolving threats in the cyber landscape and is reinforced through globally aligned standards such as ISO 27001, ISO 22301, and PCI DSS. These certifications serve not merely as badges, but as blueprints that shape our policies, behaviours, and day-to-day decisions.

From guaranteeing secure data access to maintaining a zero-tolerance policy on breaches, our response protocols are prompt and decisive. Every incident, regardless of its scale, initiates a thorough investigation and, when necessary, leads to corrective legal action, safeguarding the integrity of our network and honouring the trust of our clients.

# TRUST IN ACTION: CUSTOMERS, PARTNERS & GOVERNANCE

In today's interconnected digital ecosystem, every link plays a critical role in safeguarding trust. At Nxtra, we recognise that the strength of the entire chain depends on each participant's integrity. That's why third-party compliance is fully embedded into our governance framework. Vendors and partners are held to the same rigorous standards we uphold internally, and any deviation is addressed decisively ranging from retraining to contract termination.

At Nxtra, our Chief Information Security Officer (CISO) leads comprehensive governance supported by advanced real-time monitoring systems that instantly detect any non-compliance. These alerts trigger a rigorous investigation process, ensuring every issue is promptly addressed, resolved, and analyzed to prevent future occurrences. Our philosophy

extends beyond IT security is a collective responsibility embedded across our entire ecosystem, fostering a culture of vigilance and accountability at every level.

# **Policy-Driven Resilience**

At Nxtra, our Information Security Policy serves as our guiding compass, shaping every decision and action across the organisation. This policy extends beyond our employees to include suppliers and partners, ensuring a consistent and unwavering commitment to security throughout our entire operational ecosystem. We continuously update risk assessments, disaster recovery plans, and business continuity strategies to stay ahead of evolving global and local threats.

Our proactive approach is strengthened through close collaboration with Law Enforcement Agencies and full alignment with cybersecurity frameworks set by the Indian Computer Emergency Response Team (CERT-In). Supported by a dedicated fraud management team – expert in revenue assurance and prevention – we maintain a vigilant early warning system, safeguarding our network from emerging vulnerabilities and reinforcing trust with every stakeholder.

# BEYOND SURVEILLANCE: A LAYERED ASSESSMENT OF PHYSICAL SECURITY

Physical security at Nxtra is a story of strategy, innovation, and scale. Many of our critical facilities are situated within Special Economic Zones (SEZs), adding an extra layer of external vigilance. Our commitment goes beyond the basics, leveraging an Al-powered Security Operations Centre (SOC) that integrates cuttingedge intelligence and technology to elevate security to the highest level.

From the perimeter to the server rack, every component is protected by our comprehensive seven-layer physical security framework. Guided by detailed Standard Operating Procedures and customised site protocols, this includes 24/7 manned security, skilled personnel, controlled access to power systems, and CCTV surveillance enhanced with zoom features and predictive analytics. Our Al-driven systems don't just watch - they analyse and anticipate, using motion detection and behaviour mapping to identify potential risks before they materialise. This dynamic ecosystem, where people, processes, infrastructure, and technology converge, ensures a secure and seamless experience for every customer.



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**Seven Layers of Physical Security** Manpower/Technology Deployed Area Standard perimeter 24/7 guarding + Motorised gate with anti-collision sensors + Vehicle screening Layer 1 wall and main gate through UVSS + CCTV + Boom barriers Security Layer 2 XBIS (Baggage Scanning) + DFMD + HHMD frisking gate house Reception/ Layer 3 24\*7 guarding + Tripods/Turnstiles with anti-pass back + CCTV Lobby Data center Layer 4 24\*7 guarding + HHMD frisking + CCTV floor entrance Mantrap/anti-tail Layer 5 2FA Biometric reader + Door interlock with anti-tail gating mantrap gating mechanism Data center Layer 6 2FA Biometric reader + CCTV pod/hall Cage and Layer 7 Customised to customer requirement rack

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Implementing Digital Technologies for Physical Security

At our data centers, physical security is the first line of defense in protecting critical digital infrastructure. Leveraging digital technologies, we have adopted an intelligent and layered approach to physical security that aligns with global best practices.

Our CCTV monitoring system ensures uninterrupted, 24/7 surveillance across all our data center facilities. We are actively enhancing this capability through the integration of high-definition zoom features and **predictive movement analysis** – enabling our security teams to identify and respond to unusual behavioural patterns of individuals or objects in real time. These advanced video analytics not only improve incident response times but also play a vital role in preventing unauthorised access or suspicious activity before it escalates.

Together, these technologies not only elevate our physical security standards but also enhance overall operational resilience. Through meticulous monitoring, stringent access controls, and proactive threat intelligence, we continue to fortify our infrastructure against emerging risks – ensuring reliability, resilience, and customer trust remain uncompromised.

# **Security Risk Assessment**

As a leading data center colocation services provider operating across India, safeguarding the data entrusted to us is fundamental to our licence to operate and to the trust our customers place in us. Security Risk Assessment is a cornerstone of our data protection strategy,

enabling us to proactively identify, evaluate, and mitigate potential threats across our digital and physical infrastructure.

We conduct regular and rigorous security risk assessments at both corporate and site levels to

ensure that evolving cyber and physical threats are continually monitored and addressed. These assessments cover a wide spectrum of risks, including unauthorised access, data breaches, insider threats, and vulnerabilities related to emerging technologies.

# Key components of our security risk assessment framework include:

Asset Identification and Classification

All critical assets, including customer data, physical infrastructure, and operational systems, are catalogued and classified based on sensitivity and criticality.

Threat Modelling and Vulnerability Analysis

We leverage advanced tools and industry-standard methodologies e.g. ISO/IEC 27001 to map potential threats and identify system vulnerabilities.

3 Impact Analysis and Risk Prioritisation

Risks are evaluated for potential operational, reputational, and regulatory impact. This enables targeted mitigation planning and resource allocation.

4 Mitigation and Continuous Monitoring

Risk controls are implemented in collaboration with our cybersecurity, operations, and compliance teams. These include encryption, access controls, intrusion detection, and physical perimeter defenses. All controls are continuously monitored and updated in line with threat intelligence and audit findings.

5 Third-party Risk Management

As part of our commitment to holistic risk management, we conduct periodic security reviews of third-party service providers and enforce contractual data protection standards.

Our approach is informed by best-in-class practices and regularly reviewed by internal audit and external assessors. We also maintain a Business Continuity and Disaster Recovery Plan (BCP/DRP) for every site, which is tested bi-annually, to ensure operational resilience even under adverse conditions.

As part of our broader ESG goals, our commitment to data security is not only about compliance but about enabling sustainable digital infrastructure where customers and partners can innovate with confidence.

# Incident Response and Lifecycle Vigilance

At Nxtra, security is not just a safeguard; it's a living system of anticipation and action. Our centralised incident response team continuously monitors alerts and responds with speed and precision. Every identified risk is meticulously logged, investigated, resolved, and reviewed through monthly audits creating a continuous feedback loop that strengthens our resilience.

Protecting the full data lifecycle is just as vital. From creation to secure deletion, personal and enterprise information is safeguarded through endpoint monitoring, encrypted storage, and tightly controlled data flows, ensuring that privacy is never left to chance.

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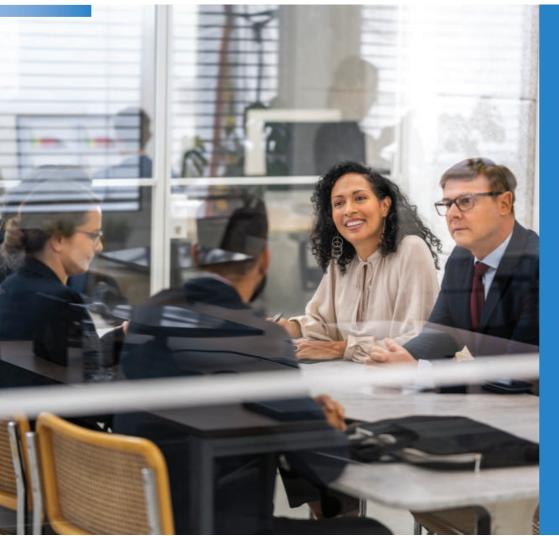
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# CUSTOMER EXPERIENCE

# Building Value Through Experience, Every Step of the Way



# **HIGHLIGHTS**

# Integrated intelligent

simulation capabilities to optimise AI/ML workload management

# Adopted 6-parameter

strategy to enhance customer satisfaction

# Utilised the digital platform

ATB for customer engagement

# 24/7 customer support

and service resolution by N-care team

# **Enhanced ESG** ratings

for customers through transparent and reliable ESG data sharing

### **SDG LINKAGE**





At Nxtra, customer experience isn't just a business goal, it's a cultural cornerstone. It defines how we engage, how we deliver, and most importantly, how we build enduring value. Behind every service, system, and solution lies a simple belief: every interaction must build trust, every response must show intent, and every touchpoint must deliver value.

As enterprises race toward digital transformation, their challenges become more intricate and their expectations more exacting. Nxtra recognises this shift and has responded by making customer experience a strategic imperative, deeply woven into the very fabric of our organisation.

We've established a dedicated Customer Experience team, anchored by a six-parameter service framework, enabling us to consistently elevate satisfaction, improve retention, and deepen loyalty. This isn't just about service excellence, it's about powering sustainable, scalable relationships.

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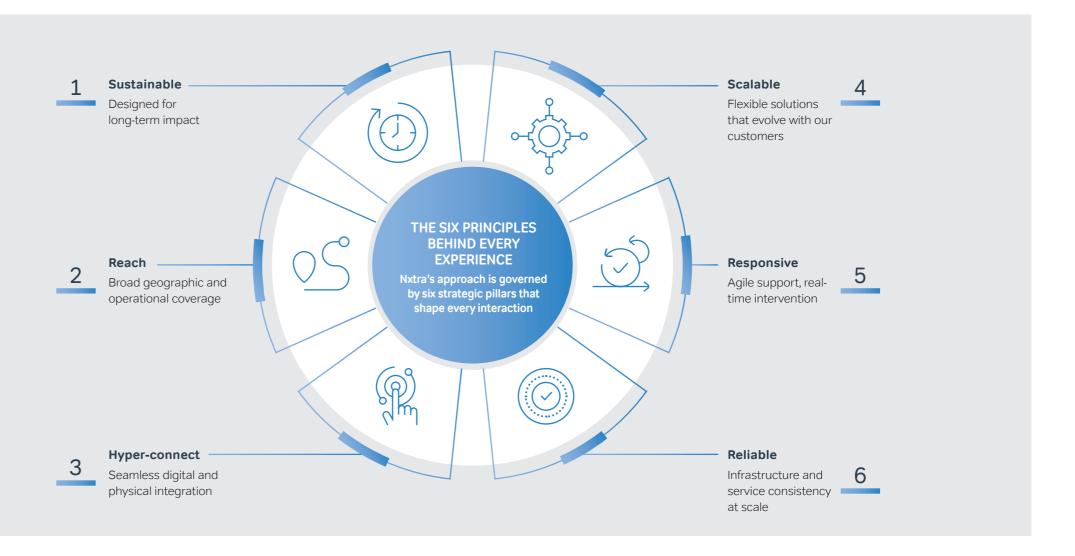
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# **ELEVATING CUSTOMER EXPERIENCE**

At Nxtra, delivering a memorable experience means going well beyond the standard expectations of uptime and security. We take a proactive approach monitoring systems round the clock, anticipating issues before they arise, and providing expert support without handoffs or delays. Through regular performance reviews, transparent SLA reporting, and actionable recommendations, we ensure our services continuously evolve with our customers' needs. We also go a step further by exceeding baseline compliance and offering ESG-aligned impact reports, while actively listening through CSAT surveys ensuring feedback leads to meaningful change.



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# CREATING LONG-TERM VALUE: A CURATED JOURNEY

At Nxtra, we don't just manage services we, curate experiences. Our Customer Journey Management framework ensures each stage from onboarding to operations is seamless, structured, and personalised. Through crossfunctional collaboration, live monitoring, and customer-first protocols, we have redefined what it means to be a partner, not just a provider.

# Continuous Care & Handholding



Support at Nxtra is centralised, digital-first, and always-on so as to provide a continuous culture of critical support.

Our N-Care team operates 24/7/365, delivering a unified, responsive experience for all post-onboarding needs. Customers engage with us through the 'Airtel Thanks for Business' app, enabling structured ticketing, real-time visibility, and end-to-end accountability. A clear escalation matrix and dedicated Service Account Managers (SAMs) ensure swift, intelligent resolutions.

# Onboarding with Precision

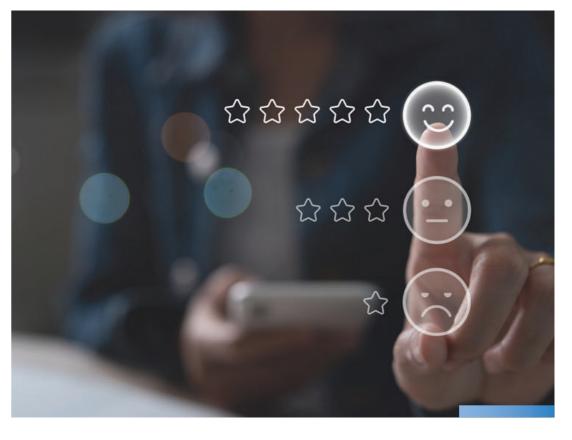


Our onboarding framework is not just structured, it's intentional. With automated workflows, transparent communication, and milestone-based tracking, we remove friction and create alignment from day one. Each stage from welcome email to service activation is managed with accountability, clarity and a human touch.

# Proactive Service Management



Our model anticipates issues before they become problems. Using intelligent analytics, continuous monitoring, and proactive interventions, we ensure operational stability and customer peace of mind. It's not about reacting, it's about being ready.



### **Customisation First**

India is rapidly emerging as a global data hub, driven by soaring digital adoption, data localisation policies, and growing investments from hyperscalers. With its strategic location, skilled workforce, and cost advantage, the country is becoming a preferred destination for hosting and managing critical digital infrastructure. Nxtra stays ahead through its tailor-made solutions as a part of a customerfirst culture:

- Dedicated solutions teams for advanced deployment and custom design
- Simulation-driven infrastructure planning for Al/ML and high-density environments
- Interactive solution modelling that enables real-time customer validation

Our consultative approach means customers don't just receive solutions; they help shape them.

# OPERATIONALISING EXCELLENCE: MAKING EXPERIENCE A CORE CAPABILITY

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# Assurance Through Structured Dialogue

We understand that for a service to be valuable, we must be proactive in our approach at all points of time. Our Service Assurance Managers conduct regular syncs weekly reviews, monthly check-ins, and quarterly business reviews (QBRs) driven by customer feedback. We have also extended Airtel Thanks Business (ATB) platform to our customers.

# ev

# **Building Brand Trust Through Leadership and Presence**

Our brand is strengthened by visibility where it matters most. Nxtra's thought leadership, featured in platforms like The Economic Times, and our active participation in industry forums such as ASSOCHAM, UNGC and W.Media, position us as a leading voice in the data center space. Internally, our ESG-driven campaigns cultivate pride among employees, while externally, they resonate with customers and stakeholders alike, reinforcing our credibility and commitment.

# Communicating with Purpose, Reinforcing with Trust

At Nxtra, every communication is crafted with intent. Each communication asset be it a brochure, digital campaign, or customer update is thoughtfully crafted and subjected to a rigorous compliance and validation process. This ensures not only accuracy and consistency but also alignment with our values delivering clear, strategic value in every customer-facing interaction.

# Immersive Experiences That Inspire Confidence

Trust is built on transparency and at Nxtra, we make it a practice, not just a principle. Through curated site visits at our facilities in Chennai, Pune, Manesar, and Mumbai, we offer CXOs a first-hand look at our infrastructure, operations, and capabilities. These immersive experiences go beyond standard engagement they create moments of connection, build mutual understanding, and foster long-term relationships grounded in confidence.



# Digital-First, Data-Led: The Nxtra Advantage

Behind every seamless interaction at Nxtra is a powerful, intelligent infrastructure designed not just to support operations, but to elevate the entire customer experience. From the moment a customer steps into our data centers to the way their workloads are managed, every layer is built for precision, reliability, and responsiveness.

Our tech-enabled ecosystem ensures that experiences are not only smooth, but smart, driven by data, powered by automation, and continuously optimised for excellence.

- Smart card access, retina scanner for added security for strategic customers and real-time monitoring through advanced BMS platforms
- DCIM dashboards offering complete visibility into SLA performance, asset health, and uptime
- Al-driven predictive maintenance that anticipates and resolves issues before they occur
- Service Account Manager (SAM)-led reviews that translate insights into meaningful actions

And with the upcoming Quartz–ATB integration, we're set to deliver a unified digital command centre giving customers full visibility and control over their infrastructure like never before.

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# LISTENING THAT LEADS TO ACTION: NPS AND CONTINUOUS FEEDBACK LOOPS

At Nxtra, feedback is more than a metric, it's a catalyst for continuous improvement. Our CBR and QBR scores conducted among Hyperscaler customers through their own performance index parameters, offer structured insights into customer sentiment. While detractor feedback triggers direct engagement from our Customer Experience (CE) team to resolve pain points, promoter feedback helps shape long-term strategic planning.

To ensure every insight is captured, we consolidate data from multiple customer touchpoints and service platforms. Our Service Account Managers (SAMs) leverage this intelligence to drive monthly and quarterly reviews, seamlessly translating customer context into operational actions.

# **Key Initiatives Driving Experience Forward**



CRM integration with ticketing and delivery systems for real-time customer insights



Customer request based live dashboards to track infrastructure utilisation and service health



Uniform infrastructure across geographies for consistent service performance



Al-powered predictive maintenance to pre-empt issues and minimise downtime



Tier III+ designs across facilities to ensure parity, performance, and reliability

At every stage of growth, we adapt our customer experience strategy to not only meet expectations but to exceed them.



# **CUSTOMER TESTIMONIALS: VOICES OF TRUST**

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I am writing to express my sincere appreciation for your exceptional work commitment as our account manager with Nxtra. Your commitment to our partnership and dedication to our business needs have been truly outstanding.

Your prompt support during end customer (CERSAI) DC/DR related requirements (visits, presentations, queries etc.) even on short notice were incredibly and extremely appreciated. We value your positive attitude, and your unwavering commitment aligned to our service deliveries to CERSAI.

Sincerely Appreciate your hard work and Thank you for being such a valuable part of our team. We look forward to continuing our successful partnership with you and Nxtra.

Best Regards,

Alok

**TCS** 



Nxtra has continued to be a responsive, valuable and supportive partner in PPBLs journey through both success and challenges. Nxtra infra & practices have been at par with industry best and PPBL has always carried assurance of operating its critical services out of Nxtra Manesar DC with confidence. PPBL has complete trust in Nxtra team's expertise, capabilities and focus on customer delight and looks forward to this association.

Best.

# **Priyank**

Paytm Payment Bank



I wanted to take a moment to sincerely thank you and Nxtra for the excellent support you've provided throughout the year with quality support and service.

Your and your team's responsiveness, professionalism, and attention to detail made a significant difference. We truly appreciate Nxtra commitment to resolving the matter quickly and efficiently.

It's a pleasure working with a partner we can rely on, and your support reinforces our confidence in continuing this collaboration. Thank you once again for the outstanding support and service.

Thanks & Regards,

# Biswaranjan Mohapatra

Ultimate Kronos Group



I'd like to express my sincere appreciation for your continued support and professionalism. Your proactive approach and attention to detail have been instrumental in ensuring a smooth and effective collaboration. Thank you for your exceptional service!

Thanks & Regards,

### Jayaprakash P

**Exotel Techcom Private Limited** 



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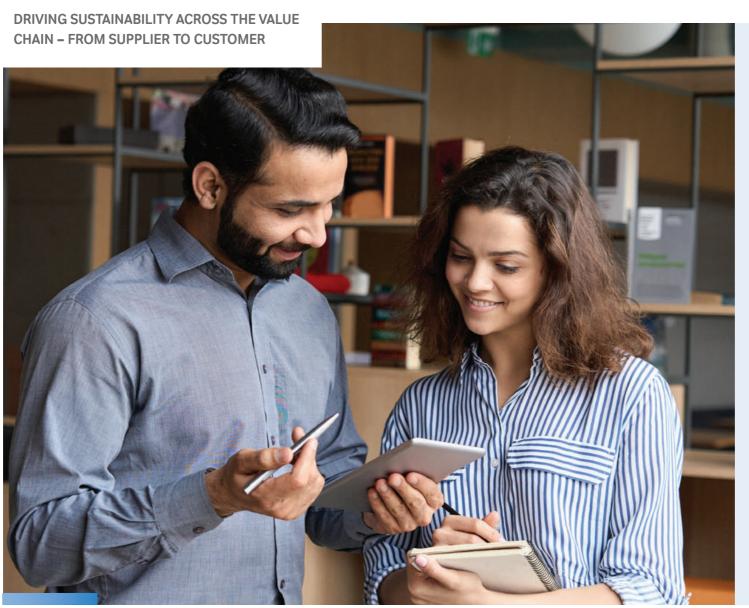


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# Case Study



At Nxtra, sustainability is more than an internal commitment it's a shared imperative that binds us to our customers and suppliers across the digital ecosystem. As digital infrastructure underpins more of the global economy, we understand that our performance directly influences the sustainability trajectory of the businesses we serve

We recognised early that enabling sustainability across the value chain requires a proactive, structured, and transparent approach. That's why we designed a sustainability strategy not just to meet our own ESG goals, but to elevate our partners' ambitions, ensuring that together, we accelerate toward a cleaner, more responsible future.

# **Strategic Objectives**

From the outset, our sustainability strategy was shaped by one guiding principle: shared progress. We aligned our actions with the long-term goals of our customers, enabling them to decarbonise, meet ESG benchmarks, and strengthen their supply chain transparency.

- Alignment with Customer Goals: Every ESG initiative at Nxtra is crafted to resonate with our customers' sustainability roadmaps especially around decarbonisation and supply chain integrity.
- Reporting with Integrity: We institutionalised robust reporting mechanisms to ensure our customers receive accurate, timely, and actionable ESG data via comprehensive sustainability questionnaires.

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- Performance That Delivers: Our strategy focusses on measurable environmental and social progress, not just for Nxtra, but as a lever to deepen customer partnerships.
- Transparent Collaboration: We promoted open, reliable data-sharing and dialogue to advance sustainability together, across the entire digital infrastructure value chain.

### **Key Actions**

Turning strategy into action required both bold thinking and operational discipline. We implemented a series of high-impact initiatives to embed sustainability at the heart of how we design, operate, and engage.

- Accelerated ESG Implementation: Nxtra advanced the use of renewable energy and energy-efficient design across its data center portfolio. These efforts were aligned with our bold goal of becoming net-zero operations by 2031, while actively supporting customers' climate ambitions.
- **Transparent ESG Reporting:** Our customers relied on our data to report and validate their own sustainability progress. We responded by delivering verifiable reports across renewable energy, emissions, water, waste, and social responsibility.
- Collaborative ESG Engagement: Understanding that every customer has a unique ESG trajectory, we maintained continuous engagement refining our strategies to support their evolving requirements.
- AI-Led Efficiency: Leveraging AI-based operational tools, we optimised power utilisation and reduced emissions, ensuring our infrastructure helped customers reduce Scope 3 emissions with precision and scale.

■ Supplier Empowerment and Scope 3 Readiness: As part of our expanded ESG focus, we extended sustainability integration upstream into our supply chain. This included initiating structured assessments to evaluate supplier performance against key ESG parameters, fostering capacity-building initiatives to strengthen responsible practices, and aligning with strategic partners to co-develop a robust framework for Scope 3 emission reductions. These efforts mark a critical step in advancing our climate goals beyond operational boundaries, reinforcing our commitment to collective progress across the value chain.

# **Qualitative Highlights**

- Improved ESG Ratings for Customers by facilitating access to transparent, accurate, and timely sustainability data. This enabled our customers to meet their disclosure obligations, enhance investor confidence, and improve preparedness for ESG-related audits and assessments.
- Strengthened Trust and Strategic Alignment by actively supporting customer decarbonisation efforts. Through the integration of our ESG reporting practices with theirs, we enabled a more cohesive approach to shared climate goals and long-term sustainability ambitions.
- Demonstrated Leadership in Global Governance Standards by aligning our disclosures with internationally recognised frameworks such as GRI and TCFD. This reinforced Nxtra's position as a credible, forward-looking partner committed to transparency, regulatory integrity, and ESG excellence.

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# **MARKETING**

More than data centers.

Purpose-built ecosystems.

Where every watt, drop, and material is accounted for. Sustainability starts from the ground up.



From racks to packaging sustainability is engineered with intent.

Nxtra's closed-loop waste management system follows the 5R approach Refuse, Reduce, Reuse, Repurpose, Recycle ensuring nothing ends up where it shouldn't.



Nxtra commits to a **greener** future, guided by **Science** 



At Nxtra, sustainability is more than just a commitment, it is a fundamental part of who we are, shaping both our brand identity and market presence under the promise: "Intelligent by Design, Sustainable by Choice". It plays a central role in our marketing approach, where we focus on driving both internal engagement and external visibility around sustainability. We remain fully aligned with recognised guidelines on responsible communication, ensuring that all marketing materials are transparent, credible, and free from any form of greenwashing. This safeguards the integrity of how we present our environmental, social, and governance (ESG) efforts. Over the past year, Nxtra has continued to shape the conversation around sustainable data centers in India. Our leadership in building intelligent, energy-efficient infrastructure has been consistently highlighted in high-profile media coverage. Through meaningful progress in sustainability and digital innovation, we have set industry benchmarks and earned recognition across leading business, technology, and mainstream media platforms.

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#### STRENGTHENING OUR VOICE THROUGH MEDIA ENGAGEMENT

At Nxtra, we continue to strengthen our voice in the industry through a focussed strategy of multi-format storytelling. Our initiatives have been featured across a range of platforms, including exclusive interviews, thought leadership pieces, and in-depth editorial features. One of the key highlights during the year was a media visit to our Chennai facility, which resulted in prominent coverage, reflecting our operational excellence and technological leadership.

Our media presence has extended across some of the country's most respected publications, including The Times of India, The Economic Times, Mint, Forbes, TelecomTalk, TechCircle, Express Computer, Mercom India, Energetica India, and The Financial Express. We have also received international recognition, with esteemed platforms such as the Financial Times and Data Center Dynamics profiling Nxtra as a leading name in world-class data center infrastructure.

# DRIVING VISIBILITY THROUGH INTEGRATED MARKETING

Our marketing approach is built around a tailored content strategy, with messaging designed to resonate with different audiences. This allows us to showcase Nxtra's capabilities across data center design, operations, scalability, ESG performance, and migration services. We deliver these narratives through integrated campaigns, leveraging channels such as LinkedIn, B2B marketing automation platforms, intent-based search, and the Google Display Network (GDN), helping us broaden our reach and strengthen our position as an industry leader.

Equally, we prioritise engaging our internal teams. ESG updates are regularly shared through our internal newsletter, keeping employees informed on key initiatives and sustainability progress. We also run focussed webinars on workplace safety, reinforcing safe working practices across all our sites.

#### **ANALYST RECOGNITION**

Nxtra is positioned in the Leaders category in the 2024 IDC MarketScape for India datacentre operations and management.

This recognition underscores our key competitive advantages, including strategically located data centers, robust design and operational excellence, cutting-edge network infrastructure, and the integration of Al-powered systems to drive efficiency in data center

management. Our empanelment with MEITY further reinforces our credibility. Notably, our strong commitment to sustainability was also acknowledged as a defining aspect of our leadership.

#### **CURATED MEDIA EVENTS**

We were honoured to host leading media organisations at our hyperscale facility in Chennai, offering them an exclusive first-hand experience of India's first Al-powered data centers by Nxtra.

Through a live demo, we showcased how AI/ML integration into operational processes is enhancing efficiency, equipment performance, and productivity.

During the event, our CEO, Ashish Arora, shared an ambitious growth roadmap, outlining key milestones and the strategic partnership with Ecolibrium. He also emphasised the pivotal role of the SmartSense platform in enabling predictive maintenance, driving energy efficiency improvements, and optimising CAPEX across operations.

Looking ahead, Nxtra remains committed to transparent, impactful communication around our ESG initiatives. By articulating our journey with a balance of ambition and accountability, we seek to inspire confidence, drive awareness, and set new benchmarks for sustainable leadership in digital infrastructure.

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# ESG FACTSHEET FY25

#### RATIOS OF STANDARD ENTRY LEVEL TO LOCAL MINIMUM WAGE (GRI 202-1)

| Details                | Unit | FY25    |
|------------------------|------|---------|
| Male                   | ₹    | 648,609 |
| Female                 | ₹    | 538,368 |
| Ratio (Male to Female) | -    | 1:0.83  |

## PROPORTION OF SPENDING ON LOCAL SUPPLIERS (GRI 204-1)

| Details   | Unit | FY25            |
|---|------|-----------------|
| Procurement budget that is spent on suppliers local to that operation | ₹    | 1,336.50 crores |
| (such as percentage of products and services purchased locally)       |      |                 |

#### **INCIDENTS OF CORRUPTION (GRI 205-3)**

| De   | etails                     | Yes/No | FY25 |
|------|----------------------------|--------|------|
| i.   | Anti-competitive behaviour | NO     | 0    |
| ii.  | Anti-trust                 | NO     | 0    |
| iii. | Monopoly legislation       | NO     | 0    |

## **TOTAL ENERGY CONSUMPTION (GRI 302-1)**

| Details                           | Unit | FY25        |
|-----------------------------------|------|-------------|
| Non-Renewable Energy Source       |      |             |
| Diesel                            | GJ   | 282,557     |
| PNG                               | GJ   | 0           |
| Electricity                       | GJ   | 1,889,702   |
| Total                             | GJ   | 2,172,259   |
| Renewable Electricity (by Source) |      |             |
| Wind                              | kWh  | 46,906,153  |
| Solar                             | kWh  | 199,968,338 |
| Total                             | kWh  | 246,874,491 |

Source of the conversion factors used: https://www.inchcalculator.com/convert/megawatt-hour-to-gigajoule/

#### **ENERGY INTENSITY (GRI 302-3)**

| Details          | Unit               | FY25   |
|------------------|--------------------|--------|
| Energy intensity | GJ/Number of racks | 109.52 |

#### Note

The energy intensity ratio includes diesel, grid electricity, open access green energy, and captive onsite generation.

The ratio is based solely on energy consumption within the organisation's operational boundaries.

#### REDUCTION OF ENERGY CONSUMPTION (GRI 302-4)

| Details   | Unit | FY25       |
|---|------|------------|
| PUE optimisation in order to reduction of our cooling |      |            |
| consumption   |      |            |
| Initiative listed as                                  |      |            |
| 1. cold/hot aisle containment                         | kWh  | 12,420,354 |
| 2. motion sensor lights                               |      |            |
| 3. UPS optimisation                                   |      |            |
| 4. end-of-life replacement etc.                       |      |            |

#### Note:

Power Usage Effectiveness (PUE) is used as a key metric to assess and monitor energy efficiency across our data centers.

#### WATER WITHDRAWAL (GRI 303-3)

| Details           | Unit | FY25    |
|-------------------|------|---------|
| Surface water     | kl   | 0       |
| Groundwater       | kl   | 9,876   |
| Seawater          | kl   | 0       |
| Third-party water | kl   | 191,152 |
| Total             | kl   | 201,028 |

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#### TOTAL WATER WITHDRAWAL FROM ALL AREAS WITH WATER STRESS

| Details           | Unit | FY25    |
|-------------------|------|---------|
| Surface water     | kl   | 0       |
| Groundwater       | kl   | 9,876   |
| Seawater          | kl   | 0       |
| Third-party water | kl   | 160,418 |
| Total             | kl   | 170,294 |

#### WATER DISCHARGE (GRI 303-4)

| Details  | Unit | FY25   |
|--|------|--------|
| Surface water  | kl   | 0      |
| Groundwater  | kl   | 0      |
| Seawater   | kl   | 0      |
| Third-party water                                    | kl   | 91,306 |
| Total  | kl   | 91,306 |
| Total water discharge to all areas with water stress | kl   | 67,087 |

#### WATER CONSUMPTION (GRI 303-5)

| Details  | Unit | FY25    |
|--|------|---------|
| Total water consumption                                  | kl   | 216,357 |
| Waste water quantity                                     | kl   | 106,635 |
| Total water consumption from all areas with water stress | kl   | 199,897 |

#### **DIRECT (SCOPE 1) GHG EMISSIONS (GRI 305-1)**

| Details                              | Unit               | FY25   |
|--------------------------------------|--------------------|--------|
| Gross direct (Scope 1) GHG emissions | tCO <sub>2</sub> e | 29,991 |
| Emissions in the base year (FY23)    | tCO <sub>2</sub> e | 26,008 |

#### Note

- The emissions calculation includes relevant greenhouse gases such as refrigerants R134A, R407C, R410A, and R410 accounting for their respective global warming potentials.
- ii. Scope 1 emissions are calculated using emission factors and GWP values as per the IPCC user guidelines, ensuring consistency with internationally recognised standards.
- iii. The operational control approach has been adopted for emissions reporting, along with standardised methodologies and assumptions aligned with relevant GHG accounting protocols.

#### INDIRECT (SCOPE 2) GHG EMISSIONS (GRI 305-2)

| Details  | Unit               | FY25    |
|--|--------------------|---------|
| Gross location-based energy indirect (Scope 2) GHG emissions | tCO <sub>2</sub> e | 381,615 |
| Emissions in the base year (FY23)                            | tCO <sub>2</sub> e | 360,020 |

#### Note:

- Energy optimisation initiatives, particularly through PUE (Power Usage Effectiveness) reduction, led to emission savings of 9,030 tCO<sub>2</sub>e.
- ii. Sourcing of renewable energy resulted in a significant reduction of 179,478 tCO e in greenhouse gas emissions.

## OTHER INDIRECT (SCOPE 3) GHG EMISSIONS (GRI 305-3)

| Details                                      | Unit               | FY25    |
|--|--------------------|---------|
| Gross other indirect (Scope 3) GHG emissions | tCO <sub>2</sub> e | 207,560 |
| Purchased Goods and Services                 | tCO <sub>2</sub> e | 7,441   |
| Capital Goods                                | tCO <sub>2</sub> e | 16,339  |
| Fuel & Energy Related                        | tCO <sub>2</sub> e | 174,531 |
| Upstream transportation                      | tCO <sub>2</sub> e | 8,746   |
| Waste Generated                              | tCO <sub>2</sub> e | 52      |
| Business Travel                              | tCO <sub>2</sub> e | 150     |
| Employee Commute                             | tCO <sub>2</sub> e | 301     |

#### **GHG EMISSIONS INTENSITY (GRI 305-4)**

| Details   | Unit                    | FY25   |
|---|-------------------------|--|
| GHG emissions intensity ratio for the organisation (Scope 1, 2 & 3)   | tCO <sub>2</sub> e/rack | 22.15  |
| Organisation-specific metric (the denominator) chosen to calculate the ratio.   | Number of racks         | 27,950   |
| Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3). | -                       | Scope-1,<br>Scope-2 and<br>Scope-3<br>(Category 1-7) |

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## **REDUCTION OF GHG EMISSIONS (GRI 305-5)**

| Details   | UoM                | FY25    |
|---|--------------------|---------|
| Emissions avoided through energy efficiency measures, including | tCO <sub>2</sub> e | 9,030   |
| Power Usage Effectiveness (PUE) optimisation                    |                    |         |
| Emissions avoided through renewable energy sourcing             | tCO <sub>2</sub> e | 179,478 |

## WASTE GENERATED (GRI 306-3)

| Details   | Unit   | FY25  |
|---|--------|-------|
| Category 1 (Plastic Waste)  |        | -     |
| Category 2 (E-Waste)  | tonnes | 847   |
| Category 3 (Biomedical Waste)   |        | -     |
| Category 4 (Construction Waste)   |        | -     |
| Category 5 (Battery Waste)  | tonnes | 503   |
| Category 6 (Radioactive Waste)  |        | -     |
| Category 7 (Other Hazardous Waste)  1. (Cotton Waste (Qty.) kg Chemical Sludge from ETP, Paint Sludge/ Residues, Spent Bath Sludge)  2. Used/Spent Oil (Liquid)  3. Discarded Containers/Barrels (Solid)  4. Waste & Residues Containing Oil (Liquid) | tonnes | 62    |
| Category 8 (Other Non-Hazardous Waste Generated) MS Scrap/Bur/Flash (Solid)   | tonnes | 1,503 |
| Total   | Tonnes | 2,915 |

# NEGATIVE ENVIRONMENTAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN (GRI 308-2)

| Details   | Unit | FY25 |
|---|------|------|
| Number of suppliers assessed for environmental impacts.   | Nos  | 52   |
| Number of suppliers identified as having significant actual and potential negative environmental impacts.   | Nos  | 0    |
| Significant actual and potential negative environmental impacts identified in the supply chain.   | Nos  | 0    |
| Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment           | %    | 0%   |
| Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why. | %    | 0%   |

## NEW EMPLOYEE HIRES AND EMPLOYEE TURNOVER (GRI 401-1)

| Details  | Unit | FY25               |        |
|--|------|--------------------|--------|
| a. Total number of new employee hires during the reporting period, by age group, gender and region |      | Number<br>employee |        |
| New employee hires   |      | Male               | Female |
| Number of new employees hired <30 years of age   | Nos  | 12                 | 17     |
| Number of new employees hired between 30-50 years of age   | Nos  | 60                 | 3      |
| Number of new employees hired >50 years of age   | Nos  | 1                  |        |
| Total (for each gender)  | Nos  | 73                 | 20     |
| Total (for each Region)  | Nos  | 93                 |        |
| Total (for particular year)  | Nos  | 93                 |        |

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| Details  | Unit | FY25<br>Number of employees<br>turnover |        |
|--|------|---|--------|
| b. Total number and rate of employee turnover during the reporting period, by age group, gender and region | _    |   |        |
| Employee turnover  | _    | Male                                    | Female |
| Number of employees turnover <30 years of age  | Nos  | 1                                       | 1      |
| Number of employees turnover between 30-50 years of age  | Nos  | 47                                      | 1      |
| Number of employees turnover >50 years of age  | Nos  | 3                                       |        |
| Total (for each gender)  | Nos  | 51                                      | 2      |
| Total (for each Region)  | Nos  | 53                                      |        |
| Total (for particular year)  | Nos  | 53                                      |        |

| Reporting Requirements                                  | Unit | FY25                |        |
|---|------|---------------------|--------|
|   |      | Rate of em<br>turno |        |
| Employee turnover                                       |      | Male                | Female |
| Number of employees turnover <30 years of age           | %    | 5.60%               | 5.60%  |
| Number of employees turnover between 30-50 years of age | %    | 27.10%              | 6.30%  |
| Number of employees turnover >50 years of age           | %    | 33.30%              | 0.00%  |
| Total (for each gender)                                 | %    | 25.50%              | 5.50%  |
| Total (for each Region)                                 | %    |                     | 22.80% |
| Total (for particular year)                             | %    |                     | 22.80% |

# BENEFITS PROVIDED TO FULL-TIME EMPLOYEES THAT ARE NOT PROVIDED TO TEMPORARY OR PART-TIME EMPLOYEES (GRI 401-2)

| Details                            | FY25 |
|------------------------------------|------|
| Details                            | Y/N  |
| Life Insurance                     | Υ    |
| Health Care                        | Υ    |
| Disability and Invalidity Coverage | Υ    |
| Parental Leave                     | Υ    |
| Retirement Provision               | N    |
| Stock Ownership                    | Υ    |

## PARENTAL LEAVE (GRI 401-3)

| Details  | Unit | FY25             |                  |       |
|--|------|------------------|------------------|-------|
|  |      | Male             | Female           | Total |
| Total number of employees entitled for parental leave  | Nos  | All<br>employees | All<br>employees |       |
| Total number of employees that took parental leave   | Nos  | 8                | 0                | 8     |
| Total number of employees that returned to work in the reporting period after parental leave ended                                       | Nos  | 8                | 0                | 8     |
| Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work | Nos  | 0*               | NA               | NA    |
| Return to work rates of employees that took parental leave   | %    | 100%             | NA               | NA    |
| Retention rates of employees that took parental leave  | %    | NA               | NA               | NA    |

<sup>\*</sup> Yet to complete 12 months from the leave availed dates

## **WORK-RELATED INJURIES (GRI 403-9)**

| De   | etails   | Unit | 2024-25 |
|------|--|------|---------|
| а.   | For all employees:   |      |         |
| i.   | The number of hours worked   | Nos  | 278,788 |
| ii.  | The number of fatalities as a result of work-related injury                          | Nos  | 0       |
|      | Rate of fatalities as a result of work-related injury                                | Nos  | 0       |
| iii. | The number and rate of high-consequence work-related injuries (excluding fatalities) | Nos  | 0       |
|      | Rate of high-consequence work-related injuries (excluding fatalities)                | Nos  | 0       |
| iv.  | The number and rate of recordable work-related injuries                              | Nos  | 0       |
|      | Rate of recordable work-related injuries   | Nos  | 0       |
| V.   | The main types of work-related injury  | Nos  | 0       |

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| For all workers who are not employees but whose work and/or workplace is controlled by the organisation: |  |   |
|--|--|---|
| The number of hours worked   | Nos  | 10,080,777  |
| The number of fatalities as a result of work-related injury  | Nos  | 0   |
| Rate of fatalities as a result of work-related injury  | Nos  | 0   |
| The number and rate of high-consequence work-related injuries (excluding fatalities)                     | Nos  | 1 (LTI)   |
| Rate of high-consequence work-related injuries (excluding fatalities)                                    | Nos  | 0.09 (LTIFR)  |
| The number and rate of recordable work-related injuries  | Nos  | 1 (LTI)   |
| Rate of recordable work-related injuries   | Nos  | 0.01 (TRIR)   |
| The main types of work-related injury  | Nos  | LTI   |
|  | The number of hours worked  The number of fatalities as a result of work-related injury  Rate of fatalities as a result of work-related injury  The number and rate of high-consequence work-related injuries (excluding fatalities)  Rate of high-consequence work-related injuries (excluding fatalities)  The number and rate of recordable work-related injuries | workplace is controlled by the organisation:  The number of hours worked Nos  The number of fatalities as a result of work-related injury Nos  Rate of fatalities as a result of work-related injury Nos  The number and rate of high-consequence work-related injuries Nos (excluding fatalities)  Rate of high-consequence work-related injuries (excluding fatalities) Nos The number and rate of recordable work-related injuries Nos  Rate of recordable work-related injuries Nos |

#### Note::

- i. Adherence to EHS Guidelines and Safe Work Procedures for Hazard Risk Assessments (HRAs) across sites.
- ii. Comprehensive Risk Assessments conducted to address potential hazards such as fall of material.
- iii. Implementation of Corrective and Preventive Actions (CAPA), including securing floor openings and materials at height, based on lessons learnt from incidents.
- iv. Regular inspections conducted across locations to ensure ongoing compliance with safety standards.
- v. Routine workplace inspections and observation-based safety programs in place to proactively identify and mitigate risks.
- vi. EHS Awareness Programs implemented to build a culture of safety among employees and contractors.
- vii. EHS performance monitoring through Monthly Statistics for both projects and operational sites.
- viii. High safety milestones achieved, including 200,000 and 1,000,000 safe man-hours, as noted in the relevant sections.

#### .WORK-RELATED ILL HEALTH (GRI 403-10)

| De   | etails   | Unit | FY25 |
|------|--|------|------|
| a.   | For all employees:   |      |      |
| i.   | The number of fatalities as a result of work-related ill health  | Nos  | 0    |
| ii.  | The number of cases of recordable work-related ill health;   | Nos  | 0    |
| iii. | The main types of work-related ill health.   | Nos  | NA   |
| b.   | For all workers who are not employees but whose work and/or workplace is controlled by the organisation:             |      |      |
| i.   | The number of fatalities as a result of work-related ill health;   | Nos  | 0    |
| ii.  | The number of cases of recordable work-related ill health;   | Nos  | 0    |
| iii. | The main types of work-related ill health.   | Nos  | NA   |
| C.   | The work-related hazards that pose a risk of ill health, including   |      |      |
| i.   | which of these hazards have caused or contributed to cases of ill health during the reporting period;                | Nos  | NA   |
| ii.  | actions taken or underway to eliminate these hazards and minimise risks using the hierarchy of controls.             | Nos  | NA   |
| d.   | Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded. | Nos  | NA   |

#### Note:

- i) EHS Guidelines, Safe Work Procedures of HRAs, Risk Assessments
- ii) Monthly EHS Statistics for Projects & Operations

#### AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE (GRI 404-1)

| Details           | Unit | Average number of training hours provided to employees |
|-------------------|------|--|
| Gender            |      | FY25   |
| Male              | Nos  | 3.9  |
| Female            | Nos  | 11.1   |
| Total             | Nos  | 15   |
| Employee category |      |  |
| Associate         | Nos  | 3.6  |
| Manager           | Nos  | 10.9   |
| Senior Management | Nos  | 0.6  |
| Total             | Nos  | 15   |

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# PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS (GRI 404-3)

| Details   | Unit | FY25 |  |  |
|---|------|------|--|--|
| a. Percentage of total employees by gender category who received a regular performance and career development review during the reporting period. |      |      |  |  |
| Male  | %    | 100% |  |  |
| Female  | %    | 100% |  |  |

# b. Percentage of total employees by employee category (Junior, Middle, Senior management) who received a regular performance and career development review during the reporting period.

| Management Level    | Unit | FY25 |
|---------------------|------|------|
| Junior              | %    | 100% |
| Middle              | %    | 100% |
| Senior              | %    | 100% |
| Management Function | Unit | FY25 |
| Technical           | %    | 100% |
| Administrative      | %    | 100% |
| Production          | %    | 100% |

## DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES (GRI 405-1)

| Details   | Unit  | FY25 |  |  |  |
|---|-------|------|--|--|--|
| a. Percentage of individuals within the organisation's governance bodies in each of the |       |      |  |  |  |
| following diversity catego  | ries. |      |  |  |  |

|     |     | Male  |     |     | Female |     |
|-----|-----|-------|-----|-----|--------|-----|
| Nos |     | 12    |     |     | 2      |     |
|     | <30 | 30-50 | >50 | <30 | 30-50  | >50 |

| Details                        | FY25          |          |             |           |           |            |         |
|--------------------------------|---------------|----------|-------------|-----------|-----------|------------|---------|
| b. Percentage of employees per | r employee ca | tegory i | n each of t | he follov | ving dive | rsity cate | gories: |
| Permanent Employees            | Nos           |          | Male        |           | Female    |            |         |
|                                | Nos           |          | 211         |           |           | 39         |         |
|                                |               | <30      | 30-50       | >50       | <30       | 30-50      | >50     |
|                                | Nos           | 16       | 186         | 9         | 18        | 20         | 1       |

| Details                 |     |             |       | FY  | 25  |       |     |
|-------------------------|-----|-------------|-------|-----|-----|-------|-----|
| Non-Permanent Employees | Nos | Male Female |       |     |     |       |     |
|                         |     | <30         | 30-50 | >50 | <30 | 30-50 | >50 |
|                         | Nos | 4           | 68    | 34  | 3   | 2     | 0   |

Note - Head count at the year end.

#### RATIO OF BASIC SALARY AND REMUNERATION (GRI 405-2)

| Details                           | Unit | FY25      |           |        |
|-----------------------------------|------|-----------|-----------|--------|
|                                   |      | Male      | Female    | Ratio  |
| Junior/Entrance level employees   | Nos  | 259,444   | 215,347   | 1:0.83 |
| Associate level employees         | Nos  | 793,336   | 750,293   | 1:0.95 |
| Middle Management level employees | Nos  | 2,034,407 | 2,103,600 | 1:0.99 |
| Senior Management level employees | Nos  | 7,866,740 |           | NA     |

#### INCIDENTS OF DISCRIMINATION AND CORRECTIVE ACTIONS TAKEN (406-1)

| De | tail | FY25  |     |    |
|----|------|---|-----|----|
| a. | Tot  | al number of incidents of discrimination during the reporting period.   | Nos | 0  |
| b. | Sta  | atus of the incidents and actions taken with reference to the following:  | Nos | -  |
|    | i.   | Incident reviewed by the organisation   | Nos | NA |
|    | ii.  | Remediation plans being implemented.  | Nos | NA |
|    | iii. | Remediation plans that have been implemented, with results reviewed through routine internal management review processes. | Nos | NA |
|    | iv.  | Incident no longer subject to action.   | Nos | NA |

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# SECURITY PERSONNEL TRAINED IN HUMAN RIGHTS POLICIES OR PROCEDURES (GRI 410-1)

| D  | etails   | Unit | FY25   |
|----|--|------|--------|
| a. | Percentage of security personnel who have received formal training in the organisation's human rights policies or specific procedures and their application to security. | %    | 100.0% |
| b. | Whether training requirements also apply to third-party organisations providing security personnel.  | -    | Yes    |
|    | % of employees who covered trainings on POSH   | %    | 100%   |
|    | % of employees who covered trainings on ESG  | %    | 100%   |
|    | % of employees who covered trainings on Security   | %    | 100%   |
|    | % of employees who covered trainings on Safety   | %    | 100%   |
|    | % of employees who covered trainings on CoC  | %    | 100%   |

#### NEGATIVE SOCIAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN (GRI 414-2)

| Details  | Unit | FY25 |
|--|------|------|
| a. Number of suppliers assessed for social impacts.  | Nos  | 52   |
| <ul> <li>Number of suppliers identified as having significant actual and<br/>potential negative social impacts</li> </ul>  | Nos  | 0    |
| c. Significant actual and potential negative social impacts identified in the supply chain   | Nos  | 0    |
| <ul> <li>Percentage of suppliers identified as having significant actual and<br/>potential negative social impacts with which improvements were<br/>agreed upon as a result of assessment</li> </ul> | Nos  | 0    |
| e. Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment, and why                 | Nos  | 0    |

## POLITICAL CONTRIBUTIONS (GRI 415-1)

| Details   | Unit | FY25         |
|---|------|--------------|
| a. Total monetary value of financial and in-kind po indirectly by the organisation by country and recip |      | directly and |
| i. Prudent Electoral Trust  | ₹    | 170,000,000  |
| TOTAL (A)   | ₹    | 170,000,000  |
| TOTAL (B)   | ₹    | -            |
| TOTAL (A+B)   | ₹    | 170,000,000  |

# ASSESSMENT OF THE HEALTH AND SAFETY IMPACTS OF PRODUCT AND SERVICE CATEGORIES (GRI 416-1)

| Details   | Unit | FY25  |
|---|------|-------|
| a. Percentage of significant product and service categories for which | %    | 74% * |
| health and safety impacts are assessed for improvement                |      |       |

<sup>\*</sup>For vendors and partners.

# INCIDENTS OF NON-COMPLIANCE CONCERNING PRODUCT AND SERVICE INFORMATION AND LABELLING (GRI 417-2)

| Details   | Unit      | FY25  |
|---|-----------|-------|
| a. Total number of incidents of non-compliance with regulations and concerning products & services information and labelling: | voluntary | codes |
| Incidents of non-compliance with regulations resulting in a fine or penalty   | Nos       | 0     |
| 2. Incidents of non-compliance with regulations resulting in a warning  | Nos       | 0     |
| 3. Incidents of non-compliance with voluntary codes   | Nos       | 0     |

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# INCIDENTS OF NON-COMPLIANCE CONCERNING MARKETING COMMUNICATIONS (GRI 417-3)

| De   | etails  | Unit | FY25 |
|------|---|------|------|
|      | Total number of incidents of non-compliance with regulations and<br>ncerning marketing communications, advertising, promotion and | •    | •    |
| i.   | Incidents of non-compliance with regulations resulting in a fine or penalty   | Nos  | 0    |
| ii.  | Incidents of non-compliance with regulations resulting in a warning   | Nos  | 0    |
| iii. | Incidents of non-compliance with voluntary codes  | Nos  | 0    |

# SUBSTANTIATED COMPLAINTS CONCERNING BREACHES OF CUSTOMER PRIVACY AND LOSSES OF CUSTOMER DATA (GRI 418-1)

| D   | etails  | Unit     | FY25       |
|-----|---|----------|------------|
|     | Total number of substantiated complaints received concerning be rivacy, categorised by: | eaches o | f customer |
| i.  | complaints received from outside parties and substantiated by the organisation          | Nos      | 0          |
| ii. | complaints from regulatory bodies.  | Nos      | 0          |

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## **ANNEXURE II**

| Statement of use | Nxtra Data Limited has reported 'with reference' to the GRI Standards for the period April 1, 2024 to March 31, 2025 |
|------------------|--|
| GRI 1 used       | GRI 1: Foundation 2021   |

| GRI Used         | GRI 1: Foundation 2021  |   |          |                     |
|------------------|---|---|----------|---------------------|
| GRI Standard     | Disclosure  | Section Reference                                       | Page no. | Reason For Omission |
| GRI 2: General   | 2-1: Organizational Details   | About The Company                                       | 5        |                     |
| Disclosures 2021 | 2-2: Entities included in the organization's sustainability                       | About The Report  | 4        |                     |
|                  | reporting   |   |          |                     |
|                  | 2-3: Reporting period, frequency, and contact point                               | About The Report  | 4        |                     |
|                  | 2-4:Restatements of information   | About The Report  | 4        |                     |
|                  | 2-5: External assurance   | Assurance Statement                                     | 126      |                     |
|                  | 2-6: Activities, value chain, and other business relationships                    | About The Report  | 4        |                     |
|                  | 2-7: Employees  | ESG Factsheet FY25                                      | 109      |                     |
|                  | 2-8: Workers who are not employees  | ESG Factsheet FY25                                      | 109      |                     |
|                  | 2-9: Governance Structure and Composition   | Corporate Governance and Business Ethics                | 79,81    |                     |
|                  | 2-10: Nomination and selection of the highest governance body                     | Corporate Governance and Business Ethics                | 81       |                     |
|                  | 2-11: Chair of the highest governing body   | Corporate Governance and Business Ethics                | 80       |                     |
|                  | 2-12: Role of the highest governance body in overseeing the management of impacts | Corporate Governance and Business Ethics                | 79-80    |                     |
|                  | 2-13: Delegation of responsibility for managing impacts                           | Corporate Governance pand Business Ethics               | 81       |                     |
|                  | 2-14: Role of the highest governance body in sustainability reporting             | Corporate Governance pand Business Ethics               | 79       |                     |
|                  | 2-15: Conflicts of interest   | FY25 Sustainability Highlights<br>Regulatory Compliance | 7, 82    |                     |
|                  | 2-16: Communication of critical concerns  | Regulatory Compliance                                   | 84-85    |                     |
|                  | 2-17: Collective knowledge of the highest governance body                         | Corporate Governance pand Business Ethics               | 80       |                     |
|                  | 2-18: Evaluation of the performance of the highest governance body                | Corporate Governance pand Business Ethics               | 81       |                     |
|                  | 2-19: Remuneration policies   | Corporate Governance pand Business Ethics               | 81       |                     |
|                  | 2-20: Process to determine remuneration   | Corporate Governance pand Business Ethics               | 81       |                     |

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| GRI Used          | GRI 1: Foundation 2021  |  |               |   |
|-------------------|---|--|---------------|---|
| GRI Standard      | Disclosure  | Section Reference  | Page no.      | Reason For Omission   |
|                   | 2-21: Annual total compensation ratio   | -  | -             | The disclosure requirement lacks complete information currently.  Nevertheless, the Company plans to include relevant details in future sustainability reports. |
|                   | 2-22: Statement on sustainable development strategy                                 | About the Company<br>Climate Strategy<br>Systematic Risk And Crisis Management | 4, 19, 90, 94 |   |
|                   | 2-23: Policy commitments  | Regulatory Compliance  | 84            |   |
|                   | 2-24: Embedding policy commitments  | Regulatory Compliance  | 84-85         |   |
|                   | 2-25: Processes to remediate negative impacts                                       | Employee Health and Well-being   | 62            |   |
|                   | 2-26: Mechanisms for seeking advice and raising concerns                            | Regulatory Compliance  | 83            |   |
|                   | 2-27: Compliance with laws and regulations  | Regulatory Compliance  | 83-85         |   |
|                   | 2-28: Membership associations   | About The Company  | 6             |   |
|                   | 2-29: Approach to Stakeholder Engagement  | Stakeholder Engagement   | 8             |   |
|                   | 2-30: Collective bargaining agreements  | Human Capital Management   | 50            |   |
| GRI 3: Material   | 3-1: Process to determine material topics   | Materiality Assessment   | 11            |   |
| Topics 2021       | 3-2: List of Material Topics  | Materiality Assessment   | 11            |   |
| Market presence   |   |  |               |   |
|                   | 202-1: Ratios of standard entry-level wage by gender compared to local minimum wage | ESG Factsheet FY25   | 109           |   |
| Indirect economic | impacts   |  |               |   |
|                   | 203-1 Infrastructure investments and services supported                             | Climate Strategy<br>Energy Management  | 20-21, 26-30  |   |
|                   | 203-2 Significant indirect economic impacts   | Community Engagement   | 69            |   |
| Procurement pract | tices   |  |               |   |
|                   | 204-1 Proportion of spending on local suppliers                                     | ESG Factsheet FY25   | 109           |   |

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| GRI Used         | GRI 1: Foundation 2021   |   |          |   |
|------------------|--|---|----------|---|
| GRI Standard     | Disclosure   | Section Reference   | Page no. | Reason For Omission   |
| Anti-corruption  |  |   | ,        |   |
|                  | 205- 1: Operations assessed for risks related to corruption                            | The Company has zero tolerance for bribery and corruption, guided by a comprehensive ABAC Policy aligned with legal requirements and embedded in the Code of Conduct. |          |   |
|                  | 205-2: Communication and training about anti-corruption policies and procedures        | Regulatory Compliance   | 83       |   |
|                  | 205-3: Confirmed incidents of corruption and actions taken                             | ESG Factsheet FY25  | 109      |   |
| Anti-competitive | behavior   |   |          |   |
|                  | 206-1: Legal actions for anti-competitive behaviour, antitrust, and monopoly practices | -   | -        | During the reporting period, there were no violations relating to anti-competitive behaviour antitrust, or monopoly practices; hence, no legal actions were initiated or pending against the company. |
| Materials        |  |   |          |   |
|                  | 301-1: Materials used by weight or volume  | Not applicable  |          | As the entity operates in the data management sector, and this indicator is typically relevant to manufacturing operations  |
|                  | 301-2: Recycled input materials used   | Not applicable  |          | As the entity operates in the data management sector, and this indicator is typically relevant to manufacturing operations  |
|                  | 301-3: Reclaimed products and their packaging materials                                | Not applicable  |          | As the entity operates in the data management sector, and this indicator is typically relevant to manufacturing operations  |
| Energy           |  |   |          |   |
|                  | 302-1:Energy consumption within the organisation                                       | ESG Factsheet FY25  | 109      |   |
|                  | 302-2: Energy consumption outside of the organization                                  | Energy Management   | 24       |   |
|                  | 302-3:Energy Intensity   | ESG Factsheet FY25  | 109      |   |
|                  | 302- 4: Reduction of energy consumption  | ESG Factsheet FY25  | 109      |   |
|                  | 302-5: Reductions in energy requirements of products and services                      | Energy Management   | 24       |   |

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| GRI Used     | GRI 1: Foundation 2021   |                              |          |  |
|--------------|--|------------------------------|----------|--|
| GRI Standard | Disclosure   | Section Reference            | Page no. | Reason For Omission  |
| Water        |  |                              |          |  |
|              | 303-1: Interactions with water as a shared resource  | Water Efficiency             | 38       |  |
|              | 303- 2: Management of water discharge-related impacts  | Water Efficiency             | 40       |  |
|              | 303-3: Water withdrawal  | Water Efficiency             | 39       |  |
|              |  | ESG Factsheet FY25           | 109      |  |
|              | 303-4: Water discharge   | Water Efficiency             | 41       |  |
|              |  | ESG Factsheet FY25           | 110      |  |
|              | 303-5: Water consumption   | Water Efficiency             | 41       |  |
|              |  | ESG Factsheet FY25           | 110      |  |
| Biodiversity |  |                              |          |  |
|              | 304-1: Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas | Green Building and Materials | 49       |  |
|              | 304-2: Significant impacts of activities, products and services on biodiversity  | Green Building and Materials | 49       |  |
|              | 304-3: Habitats protected or restored  | Green Building and Materials | 49       |  |
|              | 304-4: IUCN Red List species and national conservation list species with habitats in areas affected by operations                                | Green Building and Materials | 49       |  |
| Emission     |  |                              |          |  |
|              | 305-1: Direct (Scope 1) GHG Emissions  | ESG Factsheet FY25           | 110      |  |
|              | 305-2: Energy indirect (Scope 2) GHG Emissions   | ESG Factsheet FY25           | 110      |  |
|              | 305- 3: Other indirect (Scope 3) GHG emissions   | Carbon Emissions             | 37       |  |
|              |  | ESG Factsheet FY25           | 110      |  |
|              | 305-4: GHG Emissions Intensity   | ESG Factsheet FY25           | 110      |  |
|              | 305-5: Reduction of GHG emissions  | ESG Factsheet FY25           | 111      |  |
|              | 305-6: Emissions of ozone-depleting substances (ODS)   |                              | -        | The company is in the process of compiling reliable data to meet disclosure requirements and expects to include the relevant information in its future sustainability reports. |

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| GRI Used         | GRI 1: Foundation 2021                                       |   |          |   |
|------------------|--|---|----------|---|
| GRI Standard     | Disclosure   | Section Reference                       | Page no. | Reason For Omission                                 |
|                  | 305-7: Nitrogen oxides (NOx), sulfur oxides (SOx), and other |   |          | Nxtra undertakes emission monitoring twice a        |
|                  | significant air emissions                                    |   |          | year, in line with the requirements outlined in the |
|                  |  |   |          | respective State Pollution Control Board (SPCB)     |
|                  |  |   |          | consents. The company is currently in the process   |
|                  |  |   |          | of gathering reliable data to meet disclosure       |
|                  |  |   |          | requirements and aims to include the relevant       |
|                  |  |   |          | information in its future sustainability reports.   |
| Waste            |  |   |          |   |
|                  | 306-1:Waste generation and significant waste-related         | Waste Management                        | 42-43    |   |
|                  | impacts  |   |          |   |
|                  | 306-2: Management of significant waste-related impacts       | Waste Management                        | 43-44    |   |
|                  | 306-3: Waste generated                                       | Waste Management                        | 42       |   |
|                  |  | ESG Factsheet FY25                      | 111      |   |
|                  | 306-4: Waste diverted from disposal                          | Waste Management                        | 43-44    |   |
|                  | 306-5: Waste directed to disposal                            | Waste Management                        | 43-44    |   |
| Supplier environ | mental assessment  |   |          |   |
|                  | 308-1:New suppliers that were screened using environmental   | -                                       | -        |   |
|                  | criteria   |   |          |   |
|                  | 308-2:Negative environmental impacts in the supply chain     | ESG Factsheet FY25                      | 111      |   |
|                  | and actions taken  |   |          |   |
| Employment       |  |   |          |   |
|                  | 401- 1: New employee hires and employee turnover             | ESG Factsheet FY25                      | 111      |   |
|                  |  |   |          |   |
|                  | 401-2: Benefits provided to full-time employees that are not | ESG Factsheet FY25                      | 112      |   |
|                  | provided to temporary or part-time employees                 |   |          |   |
|                  | 401-3: Parental leave  | ESG Factsheet FY25                      | 112      |   |
| Labor/Managem    | ent Relations  |   |          |   |
|                  | 402-1:Minimum notice periods regarding operational           | Nxtra provides a minimum two-month      |          |   |
|                  | changes  | notice prior to significant operational |          |   |
|                  |  | changes.                                |          |   |

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| GRI Used            | GRI 1: Foundation 2021   |  |           |                     |
|---------------------|--|--|-----------|---------------------|
| GRI Standard        | Disclosure   | Section Reference  | Page no.  | Reason For Omission |
| Occupational Healt  | th and Safety  |  |           |                     |
|                     | 403- 1: Occupational health and safety management system   | Employee Health and Well-being                               | 62        |                     |
|                     | 403-2: Hazard identification, risk assessment, and incident investigation  | Employee Health and Well-being                               | 66        |                     |
|                     | 403-3: Occupational health services  | Employee Health and Well-being                               | 61        |                     |
|                     | 403-4: Worker participation, consultation, and communication on occupational health and safety                       | Employee Health and Well-being                               | 63        |                     |
|                     | 403-5: Worker training on occupational health and safety   | Employee Health and Well-being                               | 62        |                     |
|                     | 403-6: Promotion of worker health  | Employee Health and Well-being                               | 61        |                     |
|                     | 403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships | Employee Health and Well-being                               | 61        |                     |
|                     | 403-8: Workers covered by an occupational health and safety management system  | Employee Health and Well-being                               | 62        |                     |
|                     | 403-9: Work-related injuries   | ESG Factsheet FY25   | 113       |                     |
|                     | 403-10: Work-related ill health  | ESG Factsheet FY25   | 113       |                     |
| Training and Educa  | tion   |  |           |                     |
|                     | 404-1: Average hours of training per year per employee   | ESG Factsheet FY25   | 113       |                     |
|                     | 404-2: Programs for upgrading employee skills and transition assistance programs                                     | Diversity, Equity, and Inclusion<br>Human Capital Management | 57<br>52  |                     |
|                     | 404-3: Percentage of employees receiving regular performance and career development reviews                          | ESG Factsheet FY25   | 114       |                     |
| Diversity and Equal | l Opportunity  |  |           |                     |
|                     | 405-1: Diversity of governance bodies and employees  | ESG Factsheet FY25   | 114       |                     |
|                     | 405-2: Ratio of basic salary and remuneration of women to men  | ESG Factsheet FY25   | 114       |                     |
| Non-Discrimination  | 1  |  |           |                     |
|                     | 406-1: Incidents of discrimination and corrective actions taken  | Human Capital Management<br>ESG Factsheet FY25               | 51<br>114 |                     |

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|---------------------------------|---|-------------------------------------|----------|---------------------|
| GRI Standard                    | Disclosure  | Section Reference                   | Page no. | Reason For Omission |
| Freedom of Asso                 | ciation and Collective Bargaining   |                                     |          |                     |
|                                 | 407-1: Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk             | Human Capital Management            | 51       |                     |
| Child labor                     |   |                                     |          |                     |
|                                 | 408-1: Operations and suppliers at significant risk for incidents of child labor  | Human Capital Management            | 51       |                     |
| Forced or Compu                 | Isory Labor   |                                     |          |                     |
|                                 | 409-1: Operations and suppliers at significant risk for incidents of Forced or Compulsory Labor                                   | Regulatory Compliance               | 83       |                     |
| <b>Security Practice</b>        | s   |                                     |          |                     |
|                                 | 410-1: Security personnel trained in human rights policies or procedures  | ESG Factsheet FY25                  | 109      |                     |
| Rights of Indigen               | ous Peoples   |                                     |          |                     |
|                                 | 411-1: Incidents of violations involving the rights of indigenous peoples   | -Not Applicable                     | -        |                     |
| Human Rights As                 | sessment  |                                     |          |                     |
|                                 | 412-1: Operations that have been subject to human rights reviews or impact assessments.   | Human Capital Management            | 51       |                     |
|                                 | 412-2: Employee training on human rights policies or procedures.  | ESG Factsheet (GRI 410-1)           | 109      |                     |
|                                 | 412-3: Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening | Sustainable Supply Chain Management | 86       |                     |
| Local communiti                 | es  |                                     |          |                     |
|                                 | 413- 1: Operations with local community engagement, impact assessments, and development programs                                  | Community Engagement                | 69       |                     |
|                                 | 413-2: Operations with significant actual and potential negative impacts on local communities                                     | Community Engagement                | 69       |                     |
| Supplier social as              | ssessment   |                                     |          |                     |
|                                 | 414-1: New suppliers that were screened using social criteria   | Sustainable Supply Chain Management | 86       |                     |
|                                 | 414-2 Negative social impacts in the supply chain and actions taken   | ESG Factsheet FY25                  | 109      |                     |

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| GRI Used           | GRI 1: Foundation 2021   |  |          |                     |
|--------------------|--|--|----------|---------------------|
| GRI Standard       | Disclosure   | Section Reference  | Page no. | Reason For Omission |
| Public Policy      |  |  |          |                     |
|                    | 415-1 Political contributions  | ESG Factsheet FY25   | 109      |                     |
| Customer health ar | nd safety  |  |          |                     |
|                    | 416-1: Assessment of the health and safety impacts of product and service categories                 | ESG Factsheet FY25   | 109      |                     |
|                    | 416-2: Incidents of non-compliance concerning the health and safety impacts of products and services | No instances of non-compliance resulting in penalties have been identified during the reporting period |          |                     |
| Marketing and labe | eling  |  |          |                     |
|                    | 417-1: Requirements for product and service information and labeling                                 | Customer Experience  | 107      |                     |
|                    | 417-2: Incidents of non-compliance concerning product and service information and labeling           | ESG Factsheet FY25   | 109      |                     |
|                    | 417-3: Incidents of non-compliance concerning marketing communications                               | ESG Factsheet FY25   | 116      |                     |
| Customer privacy   |  |  |          |                     |
|                    | 418-1: Substantiated complaints concerning breaches of   | ESG Factsheet FY25   | 116      |                     |
|                    | customer privacy and losses of customer data   | Data Security and Privacy  | 96       |                     |

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# UN SUSTAINABLE DEVELOPMENT GOALS

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| SDG | Name of Goal                       | Chapter Reference                     | Page No.    |
|-----|------------------------------------|---------------------------------------|-------------|
| 1   | No Poverty                         | Community Engagement                  | 69          |
| 3   | Good Health and Well-being         | Human Capital Management              | 50,61       |
|     |                                    | Employee Health and Wellbeing         |             |
| 4   | Quality Education                  | Human Capital Management              | 50, 69      |
|     |                                    | Community Engagement                  |             |
| 5   | Gender Equality                    | Human Capital Management              | 50, 57      |
|     |                                    | Diversity, Equity and Inclusion       |             |
| 7   | Affordable & Clean Energy          | Climate Strategy                      | 19, 33, 24, |
|     |                                    | Carbon Emissions                      | 45          |
|     |                                    | Energy Management                     |             |
|     |                                    | Green Building Materials              |             |
| 8   | Decent Work and Economic<br>Growth | Human Capital Management              | 50, 57, 86  |
|     |                                    | Diversity, Equity and Inclusion       |             |
|     |                                    | Sustainable Supply Chain Management   |             |
| 9   | Industry Innovation and            | Climate Strategy                      | 19, 24, 33, |
|     | Infrastructure                     | Carbon Emissions                      | 90, 95 99   |
|     |                                    | Energy Management                     |             |
|     |                                    | Systematic Risk and Crisis Management |             |
| 10  | Reduced Inequality                 | Human Capital Management              | 50, 57, 69, |
|     |                                    | Diversity, Equity and Inclusion       | 99          |
|     |                                    | Community Engagement                  |             |
| 11  | Sustainable Cities and Communities | Climate Strategy                      | 19, 33, 24  |
|     |                                    | Carbon Emissions                      |             |
|     |                                    | Energy Management                     |             |

| SDG | Name of Goal                             | Chapter Reference   | Page No.                  |
|-----|--|---|---------------------------|
| 12  | Responsible Consumption                  | Climate Strategy  | 19, 33, 24,<br>38, 42, 45 |
|     | and Production                           | Carbon Emissions  |                           |
|     |  | Energy Management   |                           |
|     |  | Water Efficiency  |                           |
|     |  | Waste Management  |                           |
|     |  | Green Building Materials  |                           |
| 13  | Climate Action                           | Climate Strategy  | 19, 33, 24,               |
|     |  | Carbon Emissions  | 45                        |
|     |  | Energy Management   |                           |
|     |  | Green Building Materials  |                           |
| 14  | Life Below Water                         | Water Efficiency  | 38                        |
| 16  | Peace and Justice Strong<br>Institutions | d Justice Strong • Human Capital Management                               |                           |
|     |  | Diversity, Equity and Inclusion   | 78, 82, 86,<br>95         |
|     |  | Employee Health and Wellbeing   |                           |
|     |  | Corporate Governance and Business Ethics                                  |                           |
|     |  | Regulatory Compliance   |                           |
|     |  | Sustainable Supply Chain Management                                       |                           |
| 17  | Partnerships to achieve the Goal         | Climate Strategy  | 19, 33, 45,               |
|     |  | Carbon Emissions  | 69, 86                    |
|     |  | <ul><li> Green Building Materials</li><li> Community Engagement</li></ul> |                           |
|     |  |   |                           |
|     |  | Sustainable Supply Chain Management                                       |                           |

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# INDEPENDENT ASSURANCE STATEMENT



#### Independent Assurance Statement for Sustainability Report 2025 of Nxtra Data Limited

#### Service Order Number: 147090434

#### Nature of The Assurance

TÜV Rheinland India Pvt Ltd. (hereinafter TÜVR) has been engaged by Nxtra Data Limited (Nxtra) to conduct an independent moderate (limited) level of assurance of sustainability information in the Sustainability Report 2024-2025 titled "Responsible by Choice, Sustainable by Design".

The scope of assurance is based on TÜV Rheinland Sustainability Information Assurance Methodology, including data of greenhouse gas (GHG) emissions, energy consumption, water consumption and wastewater discharge, waste disposal, social data and the management systems supporting the reporting process. Verification was conducted to obtain moderate (limited) level assurance about whether the sustainability information is prepared with reference to GRI 2021, ISO 14064-3:2019 Standard and AA1000AS v3 (Moderate Type 2) Accounting standard.

#### Intended Users of this Assurance Statement

This assurance statement is provided with the intention of informing all Nxtra Data Limited's Stakeholders.

#### Responsibilities

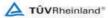
The information in the Sustainability Report and its presentation are the responsibility of the directors or governing body and the management of Nxtra Data Limited. TÜVR has not been involved in the preparation of any of the material included in the Report. Our responsibility is to express an opinion on the text, data, graphs, and statements within the scope of verification with the intention to inform all Nxtra's stakeholders.

#### Assurance Standards, Type and Level of Assurance

The TÜV Rheinland Sustainability Information Assurance protocols are based upon internationally recognized sustainability standards and guidance, including the Principles as per the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines for accuracy and reliability and the guidance on levels of assurance as per the AA1000 series of standards and guidance for Assurance Providers.

The Sustainability Report 2024-2025 has been assured at a moderate level of verification using the protocols for:

- AA1000 Assurance Standard (V3) Type 2 evaluation of the report content and supporting management systems against the AA1000 Accountability Principles (2018) of inclusivity, materiality, responsiveness, and impact.
- Verifying the reliability of the specified environmental performance indicators (greenhouse gas emissions and water data) against GHG Protocol and ISO14064-3(2019) (for GHG emissions) and the specified social performance indicators against GRI 2021
- Verifing the measure of sustainability information quality for clarity, balance, completeness and timeliness.



#### Scope of Assurance

TÜV Rheinland has been engaged with Nxtra Data Limited to assure its data and claims in the Sustainability Report 2024-2025, encompassing the period of 1st April 2024 to 31st March 2025. The scope of the assurance included the evaluation of quality, accuracy, and reliability of specified performance information:

#### Specified Performance Information and Disclosures Included in Scope

TÜV Rheinland verified the following ESG parameters given in the table below:

| ODIT                                       | ODI D'antana                                    |
|--|---|
| GRI Topics                                 | GRI Disclosure                                  |
| GRI 202: Market Presence                   | 202-1;  |
| GRI 204: Procurement Practices             | 204-1;  |
| GRI 205: Anti Corruption                   | 205-2;205-3                                     |
| GRI 206: Anti Competition Behaviour        | 206-1;  |
| GRI 302: Energy                            | 302-1, 302-3, 302-4, 302-5;                     |
| GRI 303: Water                             | 303-1, 303-2, 303-3, 303-4, 303-5;              |
| GRI 304: Bio Diversity                     | 304-1, 304-2, 304-3, 304-4                      |
| GRI 305: Emissions                         | 305-1, 305-2, 305-3, 305-4, 305-5, 305-6, 305-7 |
| GRI 306: Waste                             | 306-1, 306-2, 306-3;                            |
| GRI 308: Supplier Environmental Assessment | 308-1, 308-2;                                   |
| GRI 401: Employment                        | 401-1, 401-2, 401-3;                            |
| GRI 402: Labour Management Relation        | 402-1;  |
| GRI 403: Occupational Health and Safety    | 403-1, 403-2, 403-3, 403-4, 403-5, 403-6,       |
|  | 403,7, 403-8, 403-9, 403-10;                    |
| GRI 404: Training and Education            | 404-1, 404-2, 404-3;                            |
| GRI 405: Diversity and Equal Opportunity   | 405-1, 405-2;                                   |
| GRI 406: Non-discrimination                | 406-1;  |
| GRI 407: Freedom of association and        | 407-1;  |
| collective bargaining                      |   |
| 408-1: Child labor                         | 408-1;  |
| GRI 409: Forced or Compulsory Labour       | 409-1;  |
| GRI 410: Security Practices                | 410-1   |
| GRI 411: Rights of the Indigenous People   | 411-1;  |
| GRI 413: Local Communities                 | 413-1;  |
| GRI 414: Supplier Social Assessment        | 414-1, 414-2;                                   |
| GRI 415: Public Policy                     | 415-1;  |
| GRI 416: Customer Health and Safety        | 416-1, 416-2;                                   |
| GRI 417: Marketing and Labeling            | 417-2, 417-3;                                   |
| GRI 418: Customer Privacy                  | 418-1;  |
| · ·  | ·   |

Other than as described in the above table, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the sustainability reporting, and accordingly, we do not express a conclusion on this information. It was not part of our engagement to review product- or service-related information, references to external information sources, expert opinions and future-related statements in the Report.

#### Assurance/Verification Methodology and procedures performed.

The assurance/verification engagement has been planned and performed in accordance with the verification methodology developed by the TÜV Rheinland Group, which is based upon the ISAE 3000, ISO 17029, AA1000AS, ISO 14064-3 and GHG Protocol. The applied level of

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assurance was "moderate (limited) type 2 assurance". A moderate assurance engagement consists of pre assurance research, interviews with managers, making inquiries, primarily of persons responsible for the preparation of the Sustainability Report, onsite visits (Nxtra Head Office), virtual inspection of data, verification and confirmation of bills and vouchers, review of related materials and records and analytical procedures to calculate environmental impacts.

The verification was based on a systematic and evidence-based assurance process limited as stated above. The selection of assurance procedures is subject to the auditor's own judgment.

The procedures included amongst others:

- Inquiries of personnel who are responsible for the stakeholder engagement and materiality
  analysis process employed by Nxtra to identify ESG priorities which are relevant to its
  business, important to stakeholders and understand the reporting boundaries.
- Interviewing managers and professionals responsible for data collection, analysis and collation.
- Evaluation of the design and implementation of the systems and processes for compiling, analysing, and aggregating sustainability information as well as internal controls for reliability and accuracy of environmental data.
- Review the data management system used for collection and consolidation of environmental data.
- Review of consistency of data/information within the report and between the report and source.
- Verification of environmental performance data, on random sample basis, including a conversion factors, emission factors, and calculation based on TÜVR professional iudoement.
- Assessment of the extent to which Nxtra's sustainability activities adhere to the principles of AA1000 and GRI Standards.
- Assessment of data collection, management procedures and control mechanisms through a random sample survey of Pan India DCs including but not limited to core DCs, edge DCs, etc...
- Evaluation of the appropriateness of the quantification methods used to arrive at the environmental disclosure presented in the Sustainability Report.

#### Documentations

TÜV Rheinland reviewed the environmental, social and governance data included in the Sustainability report. Nxtra has developed a good data management system to collect, analyze and collate ESG data. During evaluation invoices, purchase orders, log books, MIS reports, daily and monthly monitoring sheets, emission factors and assumptions considered for calculation, etc are verified. Based on the evaluation of this system, TÜV Rheinland found that data was accurate, and any minor corrections were made as necessary. We believe that Nxtra has chosen an appropriate level of assurance for this stage in its reporting.

#### Limitations

The assurance process was subject to the following limitations:

- The subject matter information covered by the engagement are described in the "scope of the engagement". Assurance of further information included in the sustainability reporting was not performed. Accordingly, TÜV Rheinland do not express a conclusion on this information.
- TÜV Rheinland verified data on a sample basis; the responsibilities for the authenticity of the data entirely lies with the Nxtra.
- Financial data were only considered to the extent to check the compliance with the economic indicators provided by the GRI Standards and were drawn directly from

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independently audited financial accounts. TÜV Rheinland did not perform any further assurance procedures on data, which were subject of the annual financial audit.

 The assurance scope excluded forward-looking statements, product- or service-related information, external information sources and expert opinions.

#### Findings and Our Conclusion

Within the scope of the assurance activities (01.06.2025 to 31.07.2025) employing the methodologies described above, nothing has come to our attention that caused us to believe that the information and data contained within the Sustainability Report do not provide a fair and balanced description of Nxtra's sustainability activities from 1st April 2024 to 31st March 2025.

This verification has been conducted in accordance with the AA1000 Accountability Principles Standard (APS) to evaluate the reliability and credibility of Nxtra's sustainability reporting and stakeholder engagement practices. Our assessment included a comprehensive review of the organization's processes, stakeholder engagement methods, and the disclosures presented in the Sustainability Report 2025.

TÜV Rheinland found that Nxtra] has effectively implemented the principles of accountability, inclusivity, and responsiveness, as outlined in the AA1000 standard. The organization demonstrates a robust approach to stakeholder engagement, actively soliciting feedback and integrating it into decision-making processes. Furthermore, the report reflects a balanced view of both positive and negative impacts, aligning with stakeholder expectations.

Based on our verification findings, we conclude that the information presented in the Sustainability Report 2025 is reliable and fairly represents the organization's sustainability performance and its engagement with stakeholders. We commend Nxtra for its commitment to transparency and accountability and encourage ongoing efforts to enhance stakeholder involvement and reporting practices.

#### Use of this Statement

The Nxtra must reproduce the TÜV Rheinland statement and possible attachments in full and without omissions, changes, or additions.

This statement is by the scope of the engagement solely intended to inform the Nxtra as to the results of the mandated assessment. TÜV Rheinland has not considered the interest of any other party in the selected sustainability information, this assurance report or the conclusions TÜV Rheinland has reached. Therefore, nothing in the engagement or this statement provides third parties with any rights or claims whatsoever.

#### Independence and competence of the verifier

TÜV Rheinland India Pvt Ltd. is an independent certification and testing organization and member of the international TÜV Rheinland Group, with accreditations also in the areas of social responsibility and environmental protection. The assurance team was assembled based on the knowledge, experience, and qualification of the auditors. TÜV Rheinland India Pvt Ltd. hereby declares that there is no conflict of interest with the Nxtra Data Limited.

#### Adherence To AA1000 Accountability Principles Standard (2018)

#### Inclusivity

Nxtra has created a stakeholder engagement framework that enables the company to effectively interact with its stakeholders and address their concerns. Both internal and external stakeholders—including employees, shareholders, investors, communities, vendors,

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contractors, customers, governments, and regulatory authorities are involved in its sustainability initiatives, with the results shared publicly in the Sustainability Report. Nxtra communicates with stakeholders through various channels, including emails, exchange meetings, conferences, press releases, and diverse reports. TÜV Rheinland has validated these processes through assurance.

#### Materiality

Nxtra has implemented robust processes to identify issues that are critical to the business. A formal review has pinpointed stakeholders and the specific issues that are significant to each group, ensuring that the report addresses these matters at an appropriate level, reflecting their importance and priority to the stakeholders involved.

#### Responsiveness

Nxtra addresses stakeholder feedback regarding environmental and social sustainability through its stakeholder engagement plan and grievance redressal mechanism. This framework is designed to receive, evaluate, respond to, and resolve concerns and expectations from stakeholders in a fair and timely manner. In line with stakeholder expectations, Nxtra consistently communicates its sustainability performance to investors and shareholders via annual and audit reports. Additionally, Nxtra has established multiple committees to oversee its environmental performance in response to stakeholder needs. TÜV Rheinland has verified these processes through assurance.

#### Impact

Nxtra has showcased a process for identifying and accurately representing impacts across a spectrum of environmental, social, and governance topics, drawing from diverse sources including activities, policies, programs, decisions, and products and services, as well as their associated performance. The results of the identified material topics have been disclosed through various platforms, including the Sustainability Report. These reports highlight the impacts on both the natural environment and the communities in which Nxtra operates. Measurement and evaluation of the impacts related to these material topics are established at the target-setting stage, utilizing a combination of qualitative and quantitative metrics. TÜV Rheinland has validated these processes through assurance.

Place, Date 23<sup>rd</sup> August 2025 Bangalore (Karnataka)



#### Purnendra Kumar Gopal

Sustainability Lead I Digital Transformation

People & Business Assurance

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