

# **Bharti Airtel Sustainable Procurement Policy**



**Bharti Airtel Ltd**

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## A. Sustainable Procurement: Introduction and Objective

Bharti Airtel recognizes that the social, environmental and ethical governance performance of our upstream value chain Partners is vital for our success and increasing value for all stakeholders. We are committed to minimize adverse social and environmental impacts across our value chain through responsible business conduct. In line with our commitment, we have developed a Sustainable Procurement Policy.

This policy is applicable to all upstream value chain Partners which includes all entities and individuals who supply material/products and/or provide services of various types to Bharti Airtel, including agents / representatives/ sub-contractors of such Partners.

This policy outlines the mandatory sustainability requirements for Partners, defines expectations, promotes responsible business practices, and establishes procedures for Partner evaluation, selection, and engagement.

Our Sustainability principles are centred on promoting Ethical Business Conduct, Environmental consciousness and Sustainable Social Impact.

Sustainability Principles		
<b>Environment</b> <ul style="list-style-type: none"><li>• Climate change, energy efficiency and emission</li><li>• Resource efficiency and waste management</li><li>• Water efficiency</li><li>• Green ICT solution</li></ul>	<b>Social</b> <ul style="list-style-type: none"><li>• Talent attraction and human capital development</li><li>• Employee health and well-being</li><li>• Diversity and inclusion</li><li>• Promoting human rights</li><li>• Community development</li></ul>	<b>Governance</b> <ul style="list-style-type: none"><li>• Information security &amp; data privacy</li><li>• Corporate governance and business ethics</li><li>• Customer focus</li><li>• Sustainable Supply chain Management</li><li>• Regulatory compliance</li></ul>



## B. Mandatory Sustainability requirement

Bharti Airtel has the following mandatory Sustainability related requirements that our Partners must comply with in order to maintain their business relationship with us.

### 1. Environment mandatory requirements

**1.1 Regulatory Compliance (Product/Service specific):** Ensure compliance with all relevant Sustainability related regulatory requirements related to product /services supplied to Bharti Airtel including but not limited to

- Electronic products meet regulatory limits for restricted substances, including no more than 0.1% by weight of lead, mercury, hexavalent chromium, polybrominated biphenyls (PBBs), or polybrominated diphenyl ethers (PBDEs), and no more than 0.01% by weight of cadmium.
- Use single-use plastic packaging with a thickness exceeding 50 microns and comply with other CPCB requirements related to plastic packaging
- Obtain applicable Extended Producer Responsibility (EPR) registration and ensure relevant compliances for e-waste, plastic packaging, batteries, and other applicable categories.

**1.2 Regulatory Compliance (General):** Ensure compliance with all relevant local & national environmental laws relevant to goods/services provided to Airtel .

#### 1.3 Environment Commitment

- Ensure the avoidance of significant adverse environmental impacts, including the uncontrolled release of harmful gases into the atmosphere and the discharge of hazardous waste onto land or into water bodies, or any similar activities that may cause uncontrolled harm to the environment.
- Where requested, take measures appropriate to the nature of the business to assess and reduce carbon footprint, and provide emissions data to support Scope 3 reporting obligations.

### 2. Social Mandatory requirement

#### 2.1 Human Rights

- Prohibit slavery, forced, bonded, and child labour. Further, establish preventive measures to ensure compliance across supply chains.



- Have basic policies/ procedures in place that prohibit discrimination, harassment, forced labour, child labour and promote safe, inclusive & diverse work environment.
- Ensure measures in place to comply with Bharti Airtel Human Right policy

## **2.2 Occupational Health & Safety (Mandatory for In-Scope Activities defined in Annexure 1)**

- Ensure that policies and procedures are in place, including the implementation of a safety framework covering the use of PPE, employee training, management of high-risk activities, and governance of incidents
- Report safety incidents promptly, including fatalities while execution of Airtel operations
- Ensure measure in place to comply with Bharti Airtel Supplier Safety Policy

## **2.3 Employee wellbeing**

- Ensure regulatory compliances w.r.t to statutory benefits, including minimum wages, leave, gratuity, PF, and ESI for all employees/workers working for Bharti Airtel

## **2.4 Conflict Minerals**

- Undertake measures (where applicable) to ensure that raw materials from conflict areas including, but not limited to, tin, tantalum, tungsten and gold, or derivatives of these minerals (per the OECD Due Diligence Guidance for responsible mineral supply chains), do not enter their supply chain

# **3. Ethical Business Conduct & Governance mandatory requirements**

## **3.1 Compliance and Ethics**

- Adhere to Bharti Airtel Code of Conduct, including gift policies, insider trading, financial integrity, etc.
- Implement basic procedures/policies to prevent fraud, bribery, corruption, undue business influence, conflicts of interest etc.

## **3.2 Information security & Data Privacy (Mandatory for In-Scope Activities as Defined in Annexure 2)**

- Ensures adequate measures in places (where applicable) to protect the security, privacy & confidentiality of Bharti Airtel information
- Ensure measures in place to ensure compliance with Bharti Airtel Information security, Bharti Airtel privacy security and applicable regulatory requirements



### 3.3 Contractor Management

- Ensure measures in place such as supervision & monitoring, contractual arrangement, training etc. to ensure subcontractors comply with all above mandatory requirements w.r.t Bharti Airtel outsourced work

## C. Sustainability expectation (preferred) from Partners

In addition to the above mandatory sustainability related requirements, Bharti Airtel also expects Partners to follow the aspects mentioned below to promote sustainable business practices.

- **Sustainability Certification:** Obtain relevant organizational certifications (e.g., Environment Management system (e.g. ISO 14001), Occupational Health and Safety Management (e.g. ISO 45001), Quality Management System (e.g. TL 9000) and product certifications (e.g., energy efficiency ratings, life cycle assessments).
- **Waste Management:**
  - Adopt Sustainable Waste Management practices
  - Implement measures to reduce, reuse and recycle waste in order to promote efficient use of resources.
  - Promote use of recycled/non virgin materials for products/packaging supplied to Bharti Airtel
  - Limit use of Plastic and other hazardous materials
- **Energy & Emission Management**
  - Continuously explore re-engineering of existing and new products/supplies to Bharti Airtel with the objective to increase energy efficiency of equipment's.
  - Implement energy efficiency measures in their operations and strive to increase the share of renewable energy to reduce greenhouse gas emissions.
  - Using renewable energy alternatives like solar or wind energy.
- **Water Conservation:**
  - Partners are expected to promote water efficiency in their operations through appropriate conservation initiatives aligned with the nature and scale of their business.
  - Partners are expected to implement reasonable measures to reduce water consumption, prevent wastage, and encourage responsible water use across their operations.



- **Health & Safety:** Bharti Airtel expects its Partners to
  - Provide healthy and safe working conditions to their employees.
  - Endeavour to maintain a workplace free from recognized hazards that cause or are likely to cause physical injury or harm.
  - Ensure compliances with respect to Bharti Airtel Employee Health & Safety guidelines.
- **Community Involvement & Development:** Bharti Airtel encourages Partners to contribute in community development through charitable/philanthropic initiatives and CSR programs.
  - Support community development by promoting Education, Skill development, providing basic Infrastructure & Health Facilities
  - Increase engagement with Local Communities (including vulnerable/Marginalized group)
- **Customer Focus**
  - Disclose true and transparent information on products and conduct fair & ethical marketing
  - Ensure Customer data privacy
  - Protect the Health, Safety, and Well Being of the Customers and ensure the usage of service/goods supplied does not cause any adverse impact on Customer health.
  - Create Customer awareness related to sustainable consumption, Health, Safety, and Environmental impacts through product labels and manuals.
  - Provide adequate customer service, support and complaint resolution

## D. Policy Implementation

- **Policy Communication:** This policy will be communicated to all Partners and will be made available on the Bharti Airtel website. Partners are required to communicate the policy to all relevant employees, agents, representatives, and subcontractors who are directly or indirectly involved in providing products or services to Bharti Airtel.
- **Partner Engagement:** Bharti Airtel is committed to actively engaging with its Partners to raise awareness and ensure compliance with Bharti Airtel's sustainability



requirements, including this Sustainable Procurement Policy, through the below mentioned initiatives:

- **General Awareness:** Conducting awareness sessions to provide a comprehensive understanding of Bharti Airtel Sustainability Policy, the National Guidelines on Responsible Business Conduct (NGRBC), and the fundamental sustainability expectations from Partners.
  - **Capacity building session:** For Partners requiring additional support, Bharti Airtel will engage and provide targeted training and sharing of resources to enhance their understanding and implementation of sustainable practices.
  - **Recognition:** Partners demonstrating exceptional sustainability performance may be acknowledged through long-term contracts, recognition at partner events, and joint public media releases.
  - **Collaboration & Innovation:** Bharti Airtel encourages Partners to collaborate in developing sustainable products and solutions that contribute to environmental, social, and economic progress. We actively seek collaborative initiatives that drive value creation, promote sustainability, and improve operational efficiency. Innovative partnerships may be highlighted in Bharti Airtel sustainability report and public communications to showcase shared achievements and inspire further progress in sustainability across the value chain.
- Partners are required to actively participate in sustainability knowledge-sharing sessions and capability-building initiatives to align with Bharti Airtel sustainability goals.
  - **Sustainability Preference for business allocation:** Bharti Airtel shall consider sustainability-related parameters while allocating business to Partners, in accordance with its internal procedures. These parameters shall be evaluated and considered alongside commercial and technical considerations. Sustainability parameters include the Partner sustainability practices within the organization, compliance with this policy and applicable regulatory requirements, relevant ESG certifications, use of environmentally responsible packaging, ESG ratings or inputs from reputed agencies, and the energy efficiency of products etc.
  - **Partner assessment:** Compliance with requirements defined in this policy will be validated by Bharti Airtel through self-assessments, including the review of relevant supporting documentation, information, or site visits. Non-compliance with these requirements may result in corrective actions, including suspension or termination of the Partner relationship, as well as potential legal or regulatory consequences.
  - **Sustainability Reporting:**
    - Bharti Airtel is committed to transparently report on its sustainability performance, including key aspects of our value chain. As part of our annual



sustainability assessment, we require inputs from identified partners who represent a significant portion of our procurement spend. The information provided by partners will be consolidated and included in our sustainability report and regulatory filings.

- Partners are expected to provide accurate, complete, and truthful data that aligns with applicable reporting standards. Additionally, regulatory reporting requirements related to the value chain are expected to evolve and may require additional support and collaboration from our partners.

## E. Monitoring & Governance

- This Policy shall be periodically reviewed and updated
- No part of this policy can be construed against Bharti Airtel interests with regards to terms of conditions of Contracts/POs/GBPAs to our partners
- Partners can raise Complaints/Grievances on National Guidelines on Responsible Business Conduct Principles issued by MSA on SCM.Sustainability@Airtel.com. Reference NGRBC Principles **Reference** - NationalGuideline\_15032019.pdf (mca.gov.in)
- Airtel may consider dis-engaging with existing partners that do not meet requirements of this policy, depending upon severity of the breach or risks identified.

## F. Resources

- This Policy shall be supplemented by the following documents:
  - Bharti Airtel code of conduct for business associates: [Code of Conduct for Bharti Airtel partners](#)
  - Bhatri Airtel Human rights policy: [Bharti Airtel Limited Human Rights Policy - Airtel](#)
  - Bharti Airtel Supplier safety policy: <https://assets.airtel.in/static-assets/cms/investor/docs/Bharti-Airtel-Supplier-Safety-Policy.pdf>
  - Bharti Airtel Limited Environment, health and safety Policy: [Airtel Sustainability](#)
  - Bharti Airtel information security and data privacy policy: [Information-Security-and-Privacy-at-Airtel.docx](#)



## G. Annexure & Definition

- **Annexure 1 - Applicability of Health & Safety Mandatory Requirements:** Mandatory Health & Safety requirements apply to Partners involved in :
  - Activities performed within the Airtel work environment.
  - Activities involving Airtel's infrastructure, such as fiber cables, towers, equipment, etc.
  - Partner resources deputed by the Partner to work exclusively for Airtel.
  - Partner resources undertaking official travel to visit Airtel offices.
  
- **Annexure 2 - Applicability of Information Security and Privacy Requirement:** Information security and privacy requirements apply to Partners in following scenario :
  - Access to Airtel information or information systems.
  - Partner accessing or storing Airtel employee/customer Personally Identifiable Information (PII) or Intellectual Property (IP).
  - Partner utilizing Airtel-provided laptops or Virtual Desktop Infrastructure (VDI).
  - Partner providing Software as a Service (SaaS) or Platform as a Service (PaaS) to Airtel.
  - Partner delivering services using remote connections to Airtel infrastructure.
  - Applications are installed within Airtel premises.

