# Independent Assurance Statement

to the Management of Bharti Airtel Limited

Bharti Airtel Limited (Corporate Identity Number L74899HR1995PLC095967, hereafter referred to as 'Airtel' or 'the Company') has commissioned DNV Business Assurance India Private Limited ("DNV", "us" or "we") to conduct an independent assurance of its sustainability / non-financial disclosures disclosed in its Integrated Report (hereafter referred as 'Report' or 'IR') for the period Financial Year (FY) 2025-26.

## Scope of Work and Boundary

The scope of our engagement includes a reasonable level of assurance for the 'BRSR Core' attributes and a limited level of assurance for the rest non-financial disclosures in BRSR and GRI Topic-specific Standards for the identified material topics in the IR by the Company during the reporting period 01/04/2025 to 31/03/2026.

Reasonable assurance of BRSR Core: Boundary covers the performance of Airtel's standalone operations at the entity level, that fall under the direct operational control of the Company's Legal structure. Based on the agreed scope with the Company, the boundary of reasonable assurance covers Airtel's standalone operations across all India locations, unless otherwise specified in the BRSR disclosures by the company.

Limited assurance of rest non-financial disclosures in BRSR: Boundary for limited assurance of rest non-financial disclosures in BRSR covers the operations of Airtel's standalone operations at the entity level across all India locations, unless otherwise specified in the report by the company.

Limited assurance of non-financial disclosures in IR: The reported topic boundaries of non-financial performance are based on the materiality assessment covering the Company's operations, as brought out in the section 'About the Report' of the report. The boundary covers the performance across all India locations of Airtel and its subsidiaries that fall under the direct operational control of the Company's Legal structure, unless otherwise specified in the section 'About the Report' or respective disclosures of the report.

## Reporting Criteria and Standards

The disclosures have been prepared by Airtel with reference to:

- Industry Standard on Reporting of BRSR Core, Circular No.: SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated Dec 20, 2024.
- BRSR Core (Annexure 17A) and BRSR reporting guidelines (Annexure 16) as per Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026, dated January 30, 2026.
- Business Responsibility and Sustainability Report (BRSR) as mandated by the Securities and Exchange Board of India (SEBI), India.
- With reference to the Integrated Reporting (<IR>) framework of the International Integrated Reporting Council (IIRC).
- With reference to the requirements of the Global Reporting Initiative (GRI) standards 2021.
- GSMA ESG Metrics for Mobile.
- S&P Corporate Sustainability Assessment (CSA).
- CDP
- United Nations Sustainable Development Goals (UN-SDGs)
- Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard.

## Our competence and Independence

DNV applies its own management standards and compliance policies for quality control, which are based on the principles enclosed within ISO/IEC 17029:2019- Conformity Assessment - General principles and requirements for validation and verification bodies and accordingly maintains a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. DNV has complied with the Code of Conduct during the assurance engagement. DNV's established policies and procedures are designed to ensure that DNV, its personnel and where applicable, others are subject to independence requirements (including personnel of other entities of DNV) and maintain independence where required by relevant ethical requirements.

This engagement work was carried out by an independent team of sustainability assurance professionals. During the reporting period, i.e., FY 2025-26, DNV, to the best of its knowledge, was not involved in any non-audit/non-assurance work with the Company and its Group entities which could lead to any Conflict of Interest. DNV was not involved in the preparation of any statements or data included in the Report except for this Assurance Statement. DNV maintains complete impartiality toward stakeholders interviewed during the assurance process.

## Assurance Methodology/ Standard

DNV carried out the assurance engagement in accordance with DNV's VeriSustainTM protocol (V6.0), which is based on our professional experience and international assurance practice and the International Standard in Assurance Engagements, ISAE 3000 (revised) - Assurance Engagements other than Audits or Reviews of Historical Financial Information.

DNV's VeriSustainTM Protocol (V6.0) has been developed in accordance with the most widely accepted reporting and assurance standards. Apart from DNV's VeriSustainTM protocol (V6.0), DNV team has also followed ISO 14064-3 - Specification with guidance for the verification and validation of greenhouse gas statements to evaluate disclosures with respect to Greenhouse gas disclosures.

## Basis of our conclusion

As part of the assurance process, a multi-disciplinary team of assurance specialists performed assurance work for selected sites of Airtel. We adopted a risk-based approach, that is, we concentrated our assurance efforts on the issues of high material relevance to the Company's business and its key stakeholders. We carried out the following activities:

| BRSR Core Indicators – Reasonable level of Assurance | Rest non-financial disclosures in BRSR and IR – Limited Level of Assurance |
|---|---|
| Reviewed the disclosures under BRSR Core, encompassing the framework for assurance consisting of a set of Key Performance Indicators (KPIs) under 9 ESG attributes. The Industry Standard on Reporting of BRSR Core used a basis of reasonable level of assurance. | Reviewed the disclosures under BRSR reporting guidelines. Our focus included general disclosures, management processes, principle wise performance (essential indicators and leadership indicators) and any other key metrics specified under the reporting framework. The BRSR reporting format used a basis of limited level of assurance. |
| Evaluation of the design and implementation of key systems, processes and controls for collecting, managing and reporting the BRSR Core indicators. Assessment of operational control and reporting boundaries. | Understanding the key systems, processes and controls for collecting, managing and reporting the non-financial disclosures in BRSR. Understand and test, on a sample basis, to evaluate adherence to the reporting principles. |
| Seek extensive evidence across all relevant areas, ensuring a detailed examination of BRSR Core indicators. Engaged directly with stakeholders to gather insights and corroborative evidence for each disclosed indicator. | Collect and evaluate documentary evidence and management representations supporting adherence to the reporting principles. We adopted a risk-based approach, that is, we concentrated our assurance efforts on the issues of high material relevance to the Company's business and its key stakeholders. |
| DNV audit team conducted on-site audits for data testing and also, to assess the uniformity in reporting processes and also, quality checks at different locations of the Company. Sites for data testing and reporting system checks were selected based on the percentage contribution each site makes to the reported indicator, complexity of operations at each location (high/low/ medium) and the reporting system within the organization. Sites selected for audits are listed in Annexure II. | DNV audit team conducted on-site audits for corporate offices and sites. Sample based assessment of site-specific data disclosures was carried out. We were free to choose sites for conducting our assessment. |

- Reviewed the disclosures in the report. Our focus included general disclosures, GRI topic specific disclosures and any other key metrics specified under the reporting framework.
- Understanding the key systems, processes and controls for collecting, managing and reporting the non-financial disclosures in the report.
- Walk-through of key data sets. Understand and test, on a sample basis, the processes used to adhere to and evaluate adherence to the reporting requirements.
- Collect and evaluate documentary evidence and management representations supporting adherence to the reporting requirements.
- DNV audit team conducted on-site audits for corporate offices and sites. Sample based assessment of site-specific data disclosures was carried out. We were free to choose sites for conducting our assessment.
- Reviewed the process of reporting as defined in the assessment criteria.
- Interviews with selected ESG stakeholders responsible for management of disclosures and review of selected evidence to support ESG KPIs and metrics disclosed in the Report. We were free to choose interviewees and interviewed those with overall responsibility of monitoring, data collation and reporting the selected indicators.
- Verification of the consolidated reported performance disclosures in context to the Principle of Completeness as per VeriSustainTM Protocol, V6.0, for both reasonable level and limited level of assurance for the disclosures.

## Our Conclusion

Reasonable level of Assurance- BRSR Core: Based on our review and procedures followed for reasonable level of assurance, DNV is of the opinion that, in all material aspects, the BRSR Core Key Performance Indicators (KPIs) under 9 ESG attributes (as listed in Annexure I of this statement) for FY 2025-26 are reported in accordance with reporting requirements outlined in Industry Standard on Reporting of BRSR Core.

Limited Level of Assurance- BRSR Disclosures: On the basis of the assessment undertaken, nothing has come to our attention to suggest that the non-financial disclosures (as listed in Annexure I of this statement) in BRSR do not properly adhere to the reporting requirements as per BRSR reporting guidelines in Annexure 16 of SEBI's Master Circular.

Limited assurance of non-financial disclosures in IR: On the basis of the assessment undertaken, for the GRI disclosures as mentioned in Annexure I, nothing has come to our attention to suggest that the disclosures are not fairly stated and are not prepared, in all material aspects, with reference to the reporting criteria (as listed above) and the principles as per DNV VeriSustainTM Protocol (V6.0) as stated below.

1. **Materiality**

   The process of determining the issues that are most relevant to an organization and its stakeholders.

   The Report explains out the materiality assessment process carried out by the Company, which has considered concerns of internal and external stakeholders and inputs from peers and the industry, as well as issues of relevance in terms of impact for Airtel's business. The list of topics has been prioritized, reviewed and validated and the Company has indicated that there is no change in material topics from the previous reporting period.

   Nothing has come to our attention to suggest that the Report does not meet the requirements related to the Principle of Materiality.

2. **Responsiveness**

   The extent to which an organization responds to stakeholder issues.

   The Report adequately brings out the Company's policies, strategies, management systems and governance mechanisms in place to respond to topics identified as material and significant concerns of key stakeholder groups.

   Nothing has come to our attention to believe that the Report does not meet the requirements related to the Principle of Responsiveness.

3. **Reliability/Accuracy**

   The accuracy and comparability of information presented in the report, as well as the quality of underlying data management systems.

   The Report brings out the systems and processes that the Company has set in place to capture and report its performance related to identified material topics across its reporting boundary. The majority of information mapped with data verified through our remote assessments with Airtel's management teams and process owners at the Registered Office and sampled sites within the boundary of the Report were found to be fairly accurate and reliable. Some of the data inaccuracies identified in the report during the verification process were found to be attributable to transcription, interpretation and aggregation errors. These data inaccuracies have been communicated for correction and the related disclosures were reviewed post correction.

   Nothing has come to our attention to believe that the Report does not meet the principle of Reliability and Accuracy.

4. **Completeness**

   How much of all the information that has been identified as material to the organization and its stakeholders is reported?

   The Report brings out the Company's performance, strategies and approaches related to the environmental, social and governance issues that it has identified as material for its operational locations coming under the boundary of the report, for the chosen reporting period, while applying and considering the requirements of the Principle of Completeness.

   Nothing has come to our attention to suggest that the Report does not meet the Principle of Completeness with respect to scope, boundary and time.

5. **Neutrality/Balance**

   The extent to which a report provides a balanced account of an organization's performance, delivered in a neutral tone.

   The Report brings out the disclosures related to Airtel's performance during the reporting period in a neutral tone in terms of content and presentation, while considering the overall macroeconomic and industry environment.

   Nothing has come to our attention to suggest that the Report does not meet the requirements related to the Principle of Neutrality.

## Responsibility of the Company

Airtel has the sole responsibility for the preparation of the Report and is responsible for all information disclosed in the Report. The company is responsible for maintaining processes and procedures for collecting, analyzing and reporting the information and ensuring the quality and consistency of the information presented in the Report. Airtel is also responsible for ensuring the maintenance and integrity of its website and any referenced disclosures on their website.

## DNV's Responsibility

In performing this assurance work, DNV's responsibility is to the Management of the Company; however, this statement represents our independent opinion and is intended to inform the outcome of the assurance to the stakeholders of the Company. DNV disclaims any liability or co-responsibility for any decision a person or entity would make based on this assurance statement.

## Use and distribution of Assurance statement

This assurance statement, including our conclusion, has been prepared solely for the Company in accordance with the agreement between 'DNV' and 'Airtel'. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Management of the Company for our work or this assurance statement. We have not performed any work and do not express any conclusion, on any other information that may be published outside of the Report and/ or on the Company's website for the current reporting period.

The use of this assurance statement shall be governed by the terms and conditions of the contract between DNV and Airtel. DNV does not accept any liability if this assurance statement is used for any purpose other than its intended use, nor does it accept liability to any third party in respect of this assurance statement.

For DNV Business Assurance India Private Limited,

Chandan Sarkar
Lead Verifier

Anjana Sharma
Assurance Reviewer

Assurance Team: Goutam Banik, Jas Sahib Singh Chadha, Himanshu Babbar

08 July 2026, Bengaluru, India.

## Inherent Limitations

DNV's assurance engagement assumes that the data and information provided by the Company to us as part of our review have been provided in good faith, is true, complete, sufficient and authentic and is free from material misstatements. The assurance scope has the following limitations:

- The assurance engagement considers an uncertainty of ±5% based on the materiality threshold for estimation/measurement errors and omissions.
- DNV has not been involved in the evaluation or assessment of any financial data/performance of the Company. DNV's opinion on specific BRSR Core Attribute 8 on "Number of days of accounts payable", Attribute 9 "Open-ness of business" and all sections of BRSR indicators where currency or INR has been applied relies on the third-party audited financial statements of the Company. DNV does not take any responsibility for the financial reports in the audited financial statements of the Company.
- The assessment is limited to data and information within the defined Reporting Period. Any data outside this period is not considered within the scope of assurance.
- Data outside the operations specified in the assurance boundary is excluded from the assurance, unless explicitly mentioned otherwise in this statement.
- The assurance does not cover the Company's statements that express opinions, claims, beliefs, aspirations, expectations, aims, or future intentions. Additionally, assertions related to intellectual property rights and other competitive issues are beyond the scope of this assurance.
- The assessment does not include a review of the Company's strategy or other related linkages expressed in the Report. These aspects are not within the scope of the assurance engagement.
- The assurance does not extend to mapping the Report with reporting frameworks other than those specifically mentioned. Any assessments or comparisons with frameworks beyond the specified ones are not considered in this engagement.
- Aspects of the Report that fall outside the mentioned scope and boundary are not subject to assurance. The assessment is limited to the defined parameters.
- The assurance engagement does not include a review of legal compliances. Compliance with legal requirements is not within the scope of this assurance and the Company is responsible for ensuring adherence to relevant laws.

# Annexure I

## 1. BRSR Core KPIs - Reasonable level of assurance

- Green-house gas (GHG) footprint
- Water footprint
- Energy footprint
- Embracing circularity - details related to waste management by the entity
- Enhancing Employee Wellbeing and Safety
- Enabling Gender Diversity in Business
- Enabling Inclusive Development
- Fairness in Engaging with Customers and Suppliers
- Open-ness of business

**Notes:**

a) Calculation of Scope 1 GHG emissions is based on conversion factors, emission factors considered in 2006 IPCC Guidelines for National Greenhouse Gas Inventories, IPCC sixth assessment report, Approach towards Sustainable Telecommunications by Telecom Regulatory Authority of India (TRAI), The UK Department for Environment, Food and Rural Affairs (Defra) 2025 and GHG protocol cross sector emission factors.

b) Scope 2 GHG emissions for Indian operations are calculated using the grid emission factor published by the Central Electricity Authority (CEA), Government of India (Version 21.0), Grid Emission Factors – Weighted Average Emission Rate (including Renewable Energy Sources and cross-border electricity transfers), which is 0.710 kg $CO_2$/kWh. Airtel quantifies its Scope 2 GHG emissions using the market-based approach in accordance with the GHG Protocol.

c) Calculation of Scope 3 GHG emissions is based on emission factors considered in the UK Department for Environment, Food and Rural Affairs (Defra), US Environmental Protection Agency (EPA), US Environmentally-Extended Input-Output (USEEIO), India GHG Program and Central Electricity Authority, Govt. of India (CEA Version_21.0). For Scope 3, Category 7 (Employee Commuting), Airtel conducted an employee commuting survey during FY 2024–25. The results of that survey have been extrapolated and applied to estimate GHG emissions for FY 2025–26.

d) Airtel has documented its adopted methodologies, calculation approaches, assumptions, exclusions and omissions, materiality assessment criteria and other relevant procedures within its established SOPs for core KPIs, metrics and Scope 3 accounting.

e) Airtel reported that 100% of the waste generated during the reporting year FY 2025-26 was recycled.

## 2. BRSR Disclosures - Limited level of assurance

Section A: General Disclosures- 20-a, b, 21, 22, 25

Section C: Principle Wise Performance Disclosures:

- **Principle 1:** Essential Indicator 1, Leadership Indicator 1
- **Principle 3:** Essential Indicator 1-a, b, 2, 5, 7, 8, 9, 13, 14; Leadership Indicator 3, 5
- **Principle 5:** Essential Indicator 1, 2, 6, 10; Leadership Indicator 4
- **Principle 6:** Essential Indicator 6, Leadership Indicator 7
- **Principle 8:** Leadership Indicator 2, 6
- **Principle 9:** Essential Indicator 3

## 3. GRI Disclosures assured for limited level of assurance:

- GRI 2: General Disclosures 2021
- GRI 3: Material Topics 2021– 3-1; 3-2
- GRI 204: Procurement Practices 2016 – 204-1
- GRI 205: Anti-corruption 2016 – 205-1; 205-2; 205-3
- GRI 206: Anti-competitive Behavior 2016 – 206-1
- GRI 207: Tax 2019 – 207-1; 207-2; 207-3; 207-4
- GRI 301: Materials 2016-301-2; 301-3
- GRI 302: Energy 2016 – 302-1; 302-2; 302-3; 302-4; 302-5
- GRI 303: Water and Effluents 2018 – 303-1; 303-2; 303-3; 303-4; 303-5
- GRI 305: Emissions 2016 – 305-1; 305-2; 305-3; 305-4; 305-5; 305-7
- GRI 306: Waste 2020 – 306-1; 306-2; 306-3; 306-4; 306-5
- GRI 308: Supplier Environmental Assessment 2016 – 308-1; 308-2
- GRI 401: Employment 2016 – 401-1; 401-2; 401-3
- GRI 403: Occupational Health and Safety 2018 – 403-1; 403-2; 403-3; 403-4; 403-5; 403-6; 403-7; 403-8; 403-9
- GRI 404: Training and Education 2016 – 404-1; 404-2; 404-3
- GRI 405: Diversity and Equal Opportunity 2016 – 405-1; 405-2
- GRI 406: Non-discrimination 2016 – 406-1
- GRI 408: Child Labor 2016 – 408-1
- GRI 409: Forced or Compulsory Labor 2016 – 409-1
- GRI 413: Local Communities 2016 – 413-1; 413-2
- GRI 414: Supplier Social Assessment 2016 – 414-1; 414-2
- GRI 418: Customer Privacy 2016 – 418-1

# Annexure II – Sites selected for audit

| S.no | Site | Location |
|---|---|---|
| 1. | Head Office* (onsite & remote audit) | Airtel Center, Plot No. 16, Udyog Vihar, Phase-IV, Gurugram - 122015, India |

**Note: Airtel's complete dataset is centrally governed, maintained and managed at the Head Office.*