



## Human Capital

Airtel's strength lies in its dynamic talent base who empowers the Company to relentlessly pursue its mission of turning ideas into reality and **making meaningful difference to the lives of millions**. Keeping 'I am Airtel' and employees' health, well-being and development at the core, we are focused on creating a culture where our employees feel **winning and energised** and our top talent is **inspired and valued**. Our people policies have been designed to promote a **diverse and inclusive culture**, creating an **encouraging and healthy work environment** across employee life-cycle.

### This section includes

- Talent attraction & Human Capital development
- Employee health and well-being
- Diversity & inclusion
- Promoting human rights
- Our COVID response

### SDGs impacted



Our employees are our biggest brand ambassadors and bring to life the spirit of 'I am Airtel'. Our employees deliver on our principle of 'Customer Obsession' by prioritising customers above everything else. We cement this into our culture through following key 3 behavior of GPS - **Start Green, deliver Promises and Solve problems**:

I will do all it takes to ensure my Customer **starts Green**

I will deliver what I **promise** to my Customer

I will do all it takes to **solve** my Customer's problem

We believe that having the right talent, in the right place, at the right time is critical for success. We attract, retain, train and nurture a tech-savvy talent pool who are aligned to our values and vision. We groom our employees to be fair and ethical, own their careers while they create sustainable value

for the Company, its stakeholders and themselves. We foster an agile and collaborative environment that encourages harmony, innovation, pride and trust amongst our people. We are committed to their health, well-being & happiness and continuous learning and development.



### Workforce Composition as on March 31, 2021

Category	Male			Female		
	Age <30 years	30 -50yrs	Age > 50 years	Age <30 years	30 -50yrs	Age > 50 years
Junior management and below	2,845	6,208	102	446	366	8
Middle management	267	3,346	117	85	359	9
Top management	0	17	16	0	2	1

## Highlights

**14,194**

Total employees on roll (all nationalities)

**14,187**

Employees with India nationality

**7**

Employees from other nationalities

(4 Americans, 2 British and 1 Australian)

**12,918**

Male employees

**1,276**

Female employees

**34,600+**

Contractual employees

**2,497**

New employees hired in FY 2020-21

**2,347**

Internal hires (Open positions filled by internal candidates)

**34.8** Years

Average age of employees

**19.35%**

Employee turnover

**9.34%**

Voluntary employee turnover

**₹4,269,768**

Gross revenue per employee per month



## Talent attraction & Human Capital development

### Touching all aspects of employee life-cycle

At Airtel, we endeavour to attract and hone qualified talent who can help the Company transform into a future-ready and digital-first organisation. We attract and encourage tech-savvy talent to pursue relevant learning and development opportunities to build enriching careers.

To pivot to a new, digital-first future, we have hired top technical talent across India to create plug-and-play platforms for our customers. We are also collaborating with start-ups to expand our capabilities in developing new-age, scalable technologies and solutions based on their platforms.

Airtel has made the onboarding journey fully digitised. This role-based digitised onboarding journey has been crafted as a 90-day programme which includes the dual stages ranging from pre on-boarding to post on-boarding.



#### Enabling a flying start

Based on key principles of employee delight, faster team assimilation, cultural integration and clarity of ownership, a fully digital and tech-enabled onboarding program (administered through mobile-first induction platform – New Bee) for new joiners helps instill a strong sense of pride in joining Airtel. To make the joining a celebration, the Company provides the new joiners an attractive welcome kit having policy ready reckoner, process FAQs, welcome letter and Airtel branded merchandise.

This institutionalised journey is divided into exciting milestones – starting from introduction; comprehensive discussions with reporting manager on role clarity and induction; allocation of 'buddy' and completion of infrastructure requirements; sessions on Airtel journey – its GPS, vision, mission and values; connect with business/ functional leadership; organisational announcements; tracking progress of end-to-end induction; and goal setting for clarity in ownership etc.



We have a robust strategy to attract talented professionals who have exemplary academic, technical and functional capabilities. However, we also ensure that they are aligned with our values and committed to running a responsible, ethical, transparent and sustainable business.



#### Capability Building

We use structured interventions to build professional and functional skills and deploy broad-based learning through Product School, Techniversity and Gurukool etc. to upskill employees to deliver higher business impact.



#### Talent ownership building (People Manager Capability)

We adopt a specially designed framework to enhance the effectiveness of our people managers through structured learning interventions on practices aligned to our vision. This approach uses a 70: 20: 10 principle across People Manager Continuum and Employee lifecycle. We encourage on-the-job learning assignments, peer mentoring, formal e-learning and instructor-led training to help employees become effective people managers.



#### Building leadership pipeline

Structured leadership pipeline development program for top talent across all levels, through Airtel Leadership Academies.

Airtel has designed structured onboarding and induction journeys for new hires. We rolled out a mobile pre-onboarding app, 'NewBee', to engage with new hires digitally, given the restrictions of the pandemic.

We employ people globally and offer equal opportunities to all. We ensure adherence to human rights and labour

laws across our operations and those of our vendors to provide equitable terms of pay, working conditions and hours of work, etc. There have been no incident of major layoffs at Airtel during the last three years. Our network spans the remotest pockets of India, which creates sustainable livelihoods and productive employment opportunities for many.



### Attracting the best

We believe in attracting and retaining the best talent and have significantly ramped up our digital teams over the past year. Our successful Young Leaders Program (YLP) and Young Technical Leaders Program (YTL) have led to a pipeline of digital-first talent within the Company.

#### Young Leaders Program

This 12-month programme nurtures young talent from premier business schools through structured training, immersion in community initiatives and mentoring by the Airtel Management Board and other leaders.

**16**

Campuses visited under YLP

**49**

Young Leaders (14 females) recruited

#### Young Technical Leaders Program

This program gives graduates from leading engineering colleges an opportunity to engage with and learn from the best engineering talent and leaders in Airtel. It also gives them a bird's eye view of the Company's cutting-edge technology at work.

**12**

Campuses visited under YTL

**91**

Young Technical Leaders (19 females) recruited

### Airtel I-code – Hackathon Challenge

Airtel's first I-code – Hackathon Challenge was launched in FY 2020-21 to strengthen our employer brand visibility and recall across engineering colleges. More than **50,000** students and experienced professionals participated in the challenge.



### iCreate: Airtel's business case competition for management institutions in India

The iCreate competition gives participants a rare opportunity to tackle LIVE business problems. The winning teams get an opportunity to work with Airtel's incubation team and experience its product management capabilities. More than **5,000** participants from **17** premier business schools including IIMs, ISB, XLRI, TISS, FMS, SP Jain, MDI and IIFT participated in this business case competition in 2020. The year's theme was 'Product Incubation and Innovation' which aligns with Airtel's strong focus on bringing digital solutions to the market for the consumer and enterprise segments. Team Conquerors from the Indian Institute of Management (IIM), Bangalore won the 2020 edition of iCreate and took home the top prize of ₹10 lakhs. The campaign had a social media outreach of 10,000 in the Grand Finale Week.



### CONGRATULATIONS

#### Winner



**Team Conquerors**  
IIM Bangalore  
Sudhanyu Veldurthy  
Piyush Kabra | Aditi Chandak

#### 1<sup>st</sup> Runner Up



**Team IIMPACT**  
IIM Bangalore  
Tushar Dhande  
Deekshaa | Piyush Bailke

#### 2<sup>nd</sup> Runner Up



**Team Finite Loop**  
SPJIMR Mumbai  
Vishraja Shrivastava  
Ayush Kumar | Yash Deshmukh

## Building a deep learning culture

The success of an organisation is determined by the capabilities, engagement and commitment of its employees. To remain relevant in this ever-evolving technological landscape, we encourage our employees to keep learning. At Airtel, learning touches all aspects of the employee lifecycle.

Our learning and development approach enhances on-the-job performance and builds a capability network for current and future skills. Airtel has a mix of self-development modules and structured training covering various strategic, functional and business needs, including critical topics like Code of Conduct,

information security, data privacy and risk management. Learning at Airtel has been revolutionised by the Learning Menu Card, which summarises training options for our employees. These measures have enhanced employee productivity, efficiency and retention across the organisation.

Investing in learning and development programmes has helped us:

**Enhance** employee productivity and efficiency

**Reduce** employee turnover and the associated costs of attrition

**Increase** internal succession rate

**Increase** customer satisfaction and retention

**Improve** customer service and reduce complaints

**Increase** competitive advantage through enhanced capabilities

### Highlights of FY 2020-21

**317,333**

Total training hours

**23.34**

Total training hours per employee

**95%**

Learning coverage (percentage of employees who received training)

**7,772**

Training interventions

**₹87 Mn**

Expenditure on trainings

**₹6,399**

Spent on trainings per employee

## Behavioural training

We offer a range of training interventions to nurture positive behavioural, communication and attitudinal attributes in our employees. We launched 'Cracking the Growth Code', a series of instructor-led trainings to address critical skill development requirements to deliver high business impact for junior, middle, and senior management.

**28,072**

Training hours

Behavioural

**55**

Training interventions



## Leadership training

Leadership training programmes prepare potential talent for higher managerial positions and groom Airtel's leaders of tomorrow.

### Elevate

A people stimulation classroom programme that sensitises employees to the need for and ways to create a transparent environment powered by an open dialogue culture. 629 managers participated in the programme in the reporting year.

### Hire Right

A learning programme with scientific and structured tools which helps senior professionals understand how to recruit experienced and senior talent.

### Embark

A programme for first-time people managers involving practical skills-based training. 152 managers attended the program in the reporting year.

### Ascent 2.0

A learning module that helps people managers build high-performance teams through team visioning, collaboration, communication and coaching exercises. 90 managers underwent the training in the reporting year.

**19,419**

Training hours

Leadership

**15**

Training interventions

## Mandatory Training

Our employees undergo several mandatory trainings to ensure the safe and efficient delivery of our services and reduce organisational risks while helping us stay compliant with local and national policies and government guidelines.

**20,537**

Training hours

Mandatory

**9**

Training interventions

## Functional Training

A suite of specially designed learning programmes covering all our businesses and functions – Core business, Supply Chain Management, Marketing, Finance, Sales B2C, Airtel Business, Retail, Homes and Digital Business – strengthens domain knowledge and deepens customer-centric skills. Homes Academy, Nlead Academy (Network) and Airtel Business Academy are all functional academies that cultivate functional talent and expertise.

The programmes include modules like 'Learning-on-the-Go' (LeGo) and 'N-Rich', which train employees on new network technologies and growth tools.

### N-Rich

N-Rich builds the technical knowledge of our network employees. It covers technologies such as 5G, Cloud & Virtualisation, Packet Core & Small Cells, Network Security, IoT, Volte, Mobility Core and IP.

### LeGo 2.0

LeGo 2.0 is designed to deepen the product knowledge of the Company's high-growth offerings across Airtel Business unit employees.

### Demystifying Telecom Network

Demystifying Telecom Network covers network optimisation, understanding and troubleshooting to deepen network knowledge. The programme saw 1,300 participants who rated its effectiveness at 4.5 out of 5.

**98,216**

Training hours

Functional

**131**

Training interventions





### Digital Learning

Digital training platforms help Airtel employees access a broad range of skills and increase productivity. These include Coursera, LinkedIn Learning, iLearn, Pluralsight, Airtel101, Gurucool – Engineering, Techniversity, Product School &

Converge. In FY 2020-21, we engaged 95% of our employees in learning and development initiatives, of which 89% was through online platforms.



#### iLearn

An integrated learning application that provides on-the-go learning by integrating content from platforms like Coursera, LinkedIn and in-house programmes.



#### Airtel 101

This mobile app aims to enhance functional knowledge of all Airtel employees through small, bite-size modules that can be assimilated on-the-go.



#### LinkedIn Learning

This platform is preferred by employees to access their development action plans and facilitate learning on-the-go. We have seen a 108% increase in average LinkedIn Learning logins by our employees in FY 2020-21 compared to FY 2019-20.



#### Coursera

Employees belonging to the B1 band can nominate themselves for courses available on Coursera certified by global universities. More than 50% of the employees who signed up for the courses have completed them. The industry average stands at 40%.

**151,088**

Training hours

**7,562**

Training interventions

**7,636**

Course completions

**40,603**

Course completions

**72,560**

Course completions

**435**

Course completions

### Building a community of winning future leaders

As we stand at the cusp of a new world powered by digital forces, we reinforce our faith in the belief that an effective leadership culture defines the future trajectory of any organisation. We have defined personalised Leadership Journeys to groom our top talent. Airtel Leadership Academy, introduced in FY 2018-19, is an immersive flagship programme for building skills which is delivered along with partners like INSEAD, IIM Ahmedabad and Eruditus Executive Education. The programme is pivoted around 4 pillars viz., Strategic Thinking, Leading Self and Teams, Customer Focus, and Digital Disruption.

Aspirants at Airtel Leadership Academy undergo a rigorous selection process to be accepted. Thereafter, a structured development roadmap outlines their learning journey, including self-discovery, immersing in critical on-the-job projects, leadership exposure and undergoing customised management

development programmes from international universities. Today, Airtel Leadership Academy has become aspirational milestone and a foundation for Airtel's pursuit of turning ideas into reality.

During FY 2020-21, Airtel launched a completely virtual Advanced, Future and Emerging Leaders Program (ALP, FLP and ELP) for 255 select participants to build a strong pipeline of internal talent for critical roles across levels of the organisation to enable the pace of growth at Airtel. The Academy participants are provided a continuous roadmap of role specific on-the-job experiences, leadership exposure and deep online learning interventions. More than 160 participants have stepped up in their career through either a role movement, role enhancement or promotion during the year. The 'Amber' Mood Score for Academy participants stood at 4.62, which is better than the Company's overall score.

### Airtel Leadership Academy

#### Structured leadership development journeys for top talent across all levels



#### Executive Leadership Program (XLP) to train for senior/top management roles including CEO

Airtel rolled out the second batch of the Executive Leadership Program (XLP) in collaboration with INSEAD to groom talent for CEO roles. More than 30% of participants have stepped up to enhanced roles.



#### Advanced Leaders Program to train functional/vertical heads and Future Leaders Program to groom for middle management roles (ALP and FLP)

Through ALP and FLP, 102 participants including senior manager, DGM and GM levels from across the country selected. This programme gave participants exposure to cross-functional/cross-business knowledge through best-in-class management development programmes with leading institutes like IIM-A. More than 60% of participants from the ALP and FLP Class of FY 2020-21 have stepped up within their current roles or moved to new or enhanced roles.



#### Emerging Leaders Program (ELP) to groom first time managers/junior management

Through ELP, around 197 participants have been selected across the country to groom first-time managers. More than 30% of participants have stepped up to enhanced roles.

## Engagement across employee life-cycle

An engaged workforce drives an organisation's growth and secures its future. We endeavour to provide our employees with a superior experience from the time they become a part of Airtel. Our in-house digital platforms help us run creative and engaging internal communication programmes. They offer our employees opportunities to showcase their talent and share their knowledge and experiences.

The Airtel **Amber** app collects perceptions, expectations and satisfaction data across the employee lifecycle. Employee engagement on Amber significantly improved from 50% to over 70% in the reporting year. Our employee engagement

survey on Amber is tenure based. It triggers on an employee's 15th, 45th and 90th day in the organisation and thereafter every six months and seeks their feedback through a set of engagement questions.

The information-sharing app **Hive** allows employees to share knowledge and skills. It is a one-stop-shop to garner knowledge about Airtel. Leadership connects like **'Chai pe Charcha'** and **'Coffee Connects'** help leaders engage with our talent, new joiners and high performers in informal spaces and have free-flowing discussions.

Employee Engagement Score

**76%**

Employees responded to the engagement survey

**4.3**

Employee Engagement Score (out of 5)

**4.3**

Male Employees (out of 5)

**4**

Female Employees (out of 5)

## Fostering engagement through effective learning programmes

### Friday Masterclass Series

Launched in May 2020, voluntary webinars were conducted for our employees across the country on topics ranging from health and well-being to behavioural soft skills. #FridayMasterclass has become a weekly habit for the organisation covering over 50 masterclasses and reaching more than 6,000 unique employees.

### Pragati Academy

Making Talent Ready for Next Role – A 100-day academy aimed at grooming Territory Sales Managers from our rural and smaller regions to take responsibilities for bigger territories and urban manager (UTM) roles. 80% of the total UTM fulfilment for the reporting year was done through this route.

### Learning Café

An interactive social learning platform where employees participate in knowledge sharing sessions, debates

and discussions. In FY 2020-21, 8 Learning Café batches reached 120 participants.

### Super 40

A career development initiative for the high potential talent in Bihar and Jharkhand based on the concept of Aspire, Invest, Move (AIM). The initiative encouraged participants to have career conversations, articulate aspirations, develop Individual Development Plans and proactively look for career movement opportunities within Airtel.

### Airtel turned 25

2020 marked 25 years of Airtel's exciting journey. The Airtel growth story is synonymous with India's telecom revolution and we are immensely proud of having built an institution that has empowered hundreds of millions of Indians with affordable connectivity. Our valued employees celebrated 25 years of Airtel with great zeal and zest. On the day, we had an address



by MD & CEO, montage of Airtel's stalwarts, roundtable conference on our journey and the Airtel Idol Contest with internal band performances. Through #PasstheBaton video, a 60-second fun video message was shot for Airtel@25 which was stitched together to create a loop of organisational milestones.

The celebrations also included pre-event buzz which collated employee stories, quizzes and contests, recognising longstanding relationships and new associations. In post event buzz, we showcased employee stories.

## Employee health and well-being

The health and well-being of our employees are always one of our key priorities. We ensure our employees have access to healthy and safe work environments. During the pandemic, we advocated social distancing at office locations that continued to operate. Regular disinfection of premises, offices, buses and colonies was made mandatory. Masks, hand washes and sanitisers were given to all front-line employees.

We believe that the health and well-being of our employees is or paramount importance. We provide free health check-ups and organise wellness camps and occupational health clinics throughout the year. Our employees enjoy flexible work hours, facilities to work from home, maternity and paternity leave periods beyond government-mandated duration to maintain adequate work-life balance.

Airtel provides a dedicated day-care facility at the Airtel Centre available to all employees. Every company premise which has fifty or more employees has a crèche or day-care facility.

We enhance the effectiveness of our operational and process safety measures regularly. Detailed policies covering Workplace Safety, Health, Safety and Environment, Domestic

Travel Safety and Security, Safety of Women, Health Insurance, HIV/ AIDS, Parental Leave, Flexible Work and Group Mediclaim are in place for employees.

Safety trainings are conducted regularly to reduce workplace incidents and accidents to promote a healthier, safer and happier workforce. A total of 5,606 employees (including 3,633 contractual and 8 with disabilities) underwent safety trainings with a total of 4,545 manhours, lower compared to the last year due to the nationwide lockdown resulting in shutting down of our offices.



### Airtel Suraksha

Airtel Suraksha programme provides an overview of refreshed occupational and workplace safety standards and emphasises the Company's commitment to safety through training sessions and timely reporting and investigation of incidents. The establishment of national and local safety committees ensures periodic risk assessments of the workplace, identification of risky zones and effective course corrections.

Airtel Suraksha programme includes key safety policies as outlined below:

- » **Women Safety** – Airtel promotes a diverse workplace and ensures that women are treated with dignity and respect and that they are protected from harassment. Women Safety Policy includes awareness and periodic trainings for all women employees on POSH and Code of Conduct.
- » **Travel Safety** – Travel refers to commute covering local and transnational following all the traffic



rules and reaching out to SPOC in case of any violations. It mandates taking necessary approvals, precautions and emergency reach outs in case of any late hour travel or travel in disturbed areas.

- » **Workplace Safety** – The policy complies with protecting employees against foreseeable hazards and personal injuries.



## Diversity and inclusion

Airtel respects diversity and fosters an inclusive culture. Our diversity policy mandates equal pay for equal work for all employees, irrespective of their gender, and remediates inequalities.

Women employees are well represented across all organisational levels. To further promote gender equality, we run 'WE' – a women empowerment programme for building a community of champions to strengthen the agenda in a systemic way. It comprises various segments like highlighting women empowerment stories on social media and holding a career fair for diversity hiring.

Airtel has comprehensive policies to raise awareness about various supportive policies for women employees, including Women Safety policy, Parental Leave policy and Diversity referral programme. We saw an increased representation of diversity in Airtel Leadership Academy in the reporting year.

**22**

Differently abled employees

**~9%**

Women out of total employees

**11%**

Women in management workforce

**8.2%**

Women in junior management positions

**8.3%**

Women in top management positions

**6.56%**

Women in STEM-related positions

**5.82%**

Women in management positions in revenue-generating functions



As an organisation, we lead by the fair rewards principles and **do not differentiate based on gender.**

At Airtel, the women median salary is approximately **20% higher** than men at an organisational level.

## Structured Diversity Charter

At Airtel, we have designed a Diversity & Inclusion (D&I) strategy to promote gender diversity. Airtel stays committed to building a community of women champions to further the D&I agenda systemically. The D&I charter is based on three pillars:

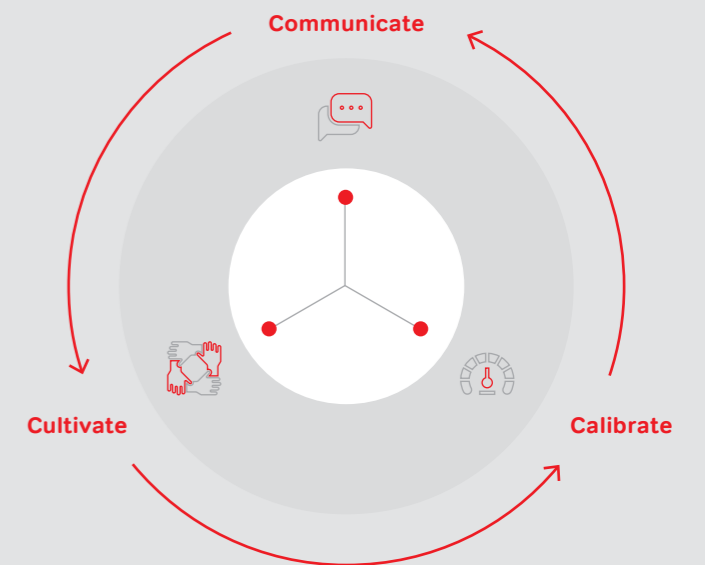
### Cultivate

We have built and nurtured the right culture of inclusivity and diversity across the organisation. We leverage the diversity lens in HR dashboards, mandate D&I training, include specific engagement questions on Diversity, Fairness, Inclusion & Belonging in our surveys. We also map the reasons for the exit of diversity talent to draw insights to build and strengthen our inclusive culture.

### Calibrate

We have introduced processes and programmes to track and augment the D&I focus, especially diversity hiring, based on six guiding principles:

- » Target 50% sourcing of diversity profiles for identified roles and specific cohorts
- » Diversity talent to be replaced by diversity talent
- » Balanced Panels – at least one female interviewer for Mid to Senior Level hiring
- » Focus on dedicated campus engagement
- » Optimisation of current channels and exploration of new channels for hiring
- » Compensation exceptions for diversity talent



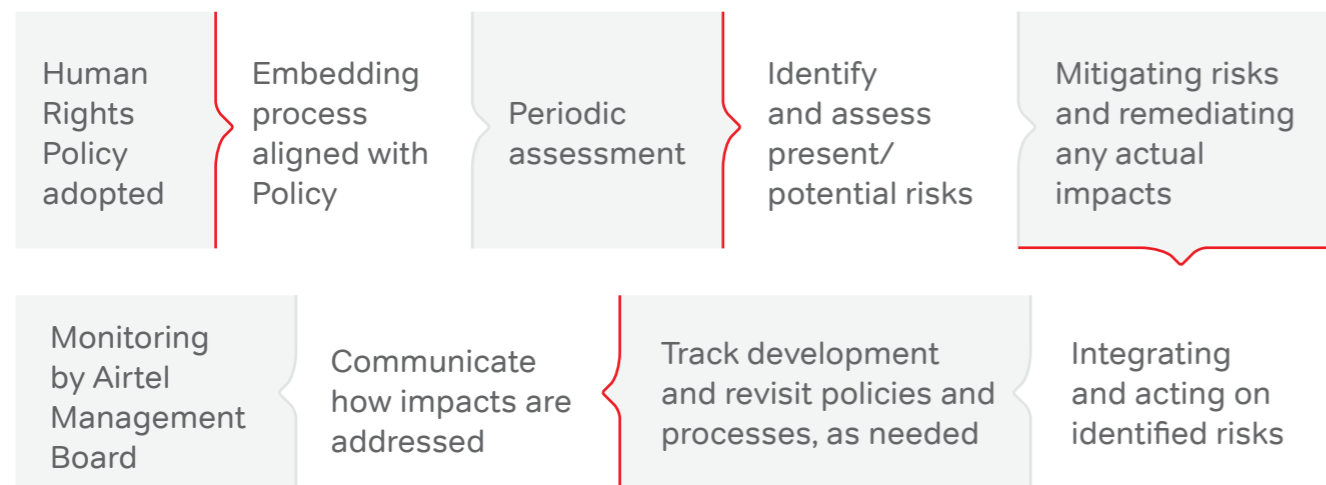
### Communicate

We have expanded our brand building and communication efforts, internally and externally through **#WELead Session with Women Leaders** and **Women Empowered** to deepen alignment and share achievements about our D&I progress.

## Promoting human rights

Airtel's commitment to human rights is reinforced through its Code of Conduct (COC) and Human Rights Policy. We are directly or indirectly responsible for a huge workforce across our value chain. The complexity of our operations carries within it the implicit risk of human rights violations. Therefore, we proactively take measures to ensure that there is no infringement on human rights across our operations, supply chains, communities and business relationships.

We have put a due diligence process in place to identify, assess, and mitigate actual and potential human rights-related risks in our own operations and across our value chain.



Our Human Rights Policy provides guidelines for our own operations and suppliers to respect internationally recognised human rights, such as equal opportunity, equal remuneration, freedom of association, and prohibition of child labour, forced labour and human trafficking. Moreover, we have zero tolerance for all forms of discrimination and harassment. We are committed to promoting a harassment-free workplace prohibiting both sexual and non-sexual harassment. All employees receive training to ensure prevention of discrimination and harassment in the workplace. Further, Airtel has a policy on the Prevention of Sexual Harassment (POSH), and any such incidents can be reported to the POSH Committee as per the process defined in the policy. Each reported allegation is taken seriously and handled confidentially. If allegations are confirmed, disciplinary action is taken against the responsible employee(s).

Further, our Code of Conduct for Business Associates defines similar guidelines for all suppliers and partners to uphold human rights and adopt practices consistent with applicable labour laws and ILO Convention and Modern Slavery Laws. Airtel has implemented measures throughout its procurement procedures, including in supplier contracts and invitations to tender, to ensure respect for human rights. Therefore, our codes and policies act as the first line of defence to avoid potential human rights related issues in our operations and

value chain. Further, we have established an annual group-wide compliance monitoring process to identify and assess risks related to human rights issues such as child labour, forced labour, payment of wages, working conditions and harassment etc., covering all our operations and contractors. Any identified risks are dealt with corrective actions and closely monitored for progress at periodic frequencies. This is supplemented by stakeholder engagement with employees, suppliers and local communities to further assess and validate the risk of identified human rights related issues. The scope of this assessment covers all issues identified in our Human Rights Policy.

Such assessments help identify risk hot spots or areas where potential human rights issues can occur in our operations and the group of stakeholders most vulnerable to the identified risks.

The risks identified in own operations or in the value chain are addressed by implementing appropriate mitigation actions, which can range from risk prevention through awareness sessions and precautionary measures, risk reduction through building capacity and safeguards or risk elimination through modifications in the business process.

In FY 2020-21, no major human rights-related risks were identified in own operations. Potential human rights-related risks identified in the value chain included risk to data privacy



and misuse of technologies, services and data. To address this, we have put in place robust measures to strengthen our data security and privacy controls across operations and via contractual agreements with partners. We have strengthened our Information Security Risk assessment and recovery strategy, which is aligned with ISO 27001 and ISO 22301 standard requirements. Airtel's business continuity management system (BSMS) is certified by ISO 27001. Our information security management systems are audited periodically by external auditors to identify any vulnerabilities. We have incorporated guidelines to ensure data privacy and security in the Code of Conduct for Business Associates for our partners. Regular audits are conducted to assess their

data security controls to ensure the resilience of their security systems and take any required corrective actions.

We have institutionalised a mechanism to allow for reporting and remediation of all human rights violations through our ombudsman process and whistleblower policy. This allows all employees, contractors and suppliers to report any human rights-related concerns. All actual violations are dealt seriously with remediation actions depending upon the severity of the violation and can also include termination of employees and business contracts. Human rights violations and corrective actions in FY 2020-21 are reported in our Business Responsibility Report.