



VINDHYA TELELINKS LIMITED

1 Policy

Prepared by
Sustainability Committee

Approved by

EMT

Valid from
2016, October, 18

Applies to
VINDHYA
TELELINKS
LIMITED

SUSTAINABILITY POLICY

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1. BACKGROUND AND PURPOSE

VINDHYA TELELINKS LIMITED (VTL) assumes far-reaching responsibility for its own operations and the impact they have on all people, the environment and wider society in a longer-term perspective. Obviously, all operations are based on compliance with applicable legislation, but in many contexts, VTL assumes greater responsibility than this. VTL's Sustainability Policy defines the company's view on and overall ambitions in the sustainability segment, which serves as a broad framework for the whole group. The Sustainability Policy includes health, safety, environmental and quality (HSEQ) issues.

2. POLICY STATEMENT

VTL's ambition is to continuously develop the business from a broad and long term perspective – to conduct a profitable and sound business today without compromising the opportunities to do so in the future. This means VTL strives to serve as a good corporate citizen, which not only takes responsibility for its own development, but also its impact on all people, the environment and society generally.

VTL's sustainability work is conducted from a triple bottom line perspective, which considers business, social and environmental aspects:

Business sustainability—striving for a stable and profitable progress over time and applying good business practice.

Social sustainability—acting as a responsible employer as well as contributing to improved social progress.

Environmental sustainability—protecting the environment by actively strive to reduce our own and our customers' environmental impact as well as optimizing the resource utilization.



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Largely, the services that VTL delivers are provided by its own staff, but some are also delivered by suppliers. Accordingly, VTL also applies its sustainability standards to the work of its suppliers. This means VTL strives for developing sustainable relations with its suppliers, and to actively make demands on as well as follow up significant suppliers in line with this policy.

To understand how operations affect the business environment and the expectations on VTL the company endeavors to maintain a structured and active dialogue with the important stakeholders in order to identify, analyze and manage their expectations, but also risks and opportunities that exist in our operations. This dialogue is summarized and reviewed in the Sustainability Committee. The risks and opportunities are annually summarized and reviewed.

2.1 Business responsibility

2.1.1 Overall ambition

The overall ambition within the business area is to achieve long-term business sustainability by striving for a stable and profitable progress over time and by applying good business practice.

In order to get there, VTL needs to provide a competitive, professional and value-adding service delivery based on continuously improved operations. This ensures good demand for our services and long-lasting customer collaborations. A sharp focus on results is also important, as well as respecting laws, and applying good business practice. This also applies to our suppliers.

2.1.2 Position of principles (Business Responsibility)

Within the business area, VTL is focusing on the following:

- VTL should conduct a professional operation, delivering value-adding and innovative solutions based on our customer's standards of functionality, finances and reliability.
- VTL should perform our duties professionally and in accordance with laws, regulations and sector practice, and actively endeavor to minimize the consequences of potential disruptions through good continuity planning.
- VTL should add customer value by continuously develop, improve and adapt services delivered to changes in the customer's operation. This is conducted through a pronounced improvement culture and structured work on innovations.



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- **VTL will progress stably and profitably proceeding from a good ethical and moral attitude**
By providing a value-added and competitive service delivery, VTL will safeguard its long-term customer relationships, which combined with a professional sales approach, sharp focus on financial results and cash flow, will provide stable financial progress. All operations will comply with good business practice, as stated in the Code of Conduct.
- **VTL will provide accurate and relevant information in a secure manner**
VTL's corporate communication work should be conducted in accordance with its group-wide Communication Policy. To aid transparency and comparability, in its financial reporting, the group complies with accepted standards and principles where applicable. Information management will be secure, and in accordance with the group-wide information security policy.

2.2 Social responsibility

2.2.1 Overall ambition and strategy

The overall ambition within the social area is to strive for a better society by acting as a responsible and respectful employer as well as contributing to improved social progress.

This will be achieved by VTL taking all people's equal value and rights into account, and by providing all staff with a good, safe, fair, non-discriminatory work environment. In addition to this, employee development is a priority. We also make a difference by different kinds of local community involvement.

VTL focus on occupational health and safety as well as management and employee development.

2.2.2 Position of Principles (Social Responsibility)

Within the social area, VTL is focusing on the following:

- **VTL actively work for well-being employees and a safe working environment**
 - VTL should offer its employees a safe and sound working environment, which means a strong focus on occupational health and safety and a pronounced culture of continuous improvements.
 - VTL strives to minimize the sick leave by stimulating good health and the opportunity to achieve a good work-life balance.



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- VTL pursues a clear vision of zero workplace accidents, which is achieved by a strong risk awareness and structured work with safety work.
- **VTL nurtures diversity, equality and a professional development of our employees**
- VTL pursues an including attitude and strive for a fair and equal treatment of all employees regardless of sex, age, sexual orientation, disability, ethnicity or religion.
- VTL offer all employees personal yearly appraisal interviews, and professional development through training and other measures to improve competence. A strong culture of continuous improvements also ensures all employees have the opportunity to influence their work and VTLs delivery.
- VTL should offer all employees fair and equal market terms and benefits.
- **VTL should contribute to social progress by local community involvement**
- Our business and our way of working affects people in the locations and geographics we are operating. VTL has the possibility and interest to support the communities where we operate.

2.3 Environmental Responsibility

2.3.1 Overall Ambition and Strategy

The overall ambition within environmental responsibility is to protect the environment by actively trying to reduce our own and our customers' environmental impact, as well as to reduce the resource utilization – both activities carried out in-house and by suppliers.

In order to achieve this, we aim for improved environmental performance we actively reduce our own environmental impact, i.e. energy usage, waste management, chemical usage, carbon emissions from transports and resource efficiency.

2.3.2 Position of Principles (Environmental Responsibility)

Within the environmental area, VTL is focusing on the following:

- **VTL should actively endeavour to minimize its customers' environmental impact, and not least, their energy consumption**
VTL should provide green advisory services, and contribute to customers fulfilling their environmental commitments – not least in the energy segment, but also in the waste, water and chemical segment.



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- **VTL should conduct structured and proactive internal environmental work**
VTL will work proactively to minimize the environmental impact arising from its own operations – as well as for purchased goods and/or services. All operations should be conducted in a manner satisfying the ISO 14001 international environmental standard. This will be achieved by:

Endeavoring to minimize our own environmental impact, energy consumption, waste management, chemical handling and resource efficiency.

3. ROLES AND RESPONSIBILITIES

The President and CEO, who is also the decision-maker on matters affecting VTL bears ultimate responsibility for the company's operations, including the sustainability. The CEO has delegated operational responsibility to dedicated functions and managers.

In order to ensure the necessary coordination and control, a Management person is appointed to report directly to The Board of Directors. The concerned employee and his/her team prepare proposals for policies, overall objectives and principles of sustainability governance for the entire group. The team is also tasked with setting and monitoring the annual indicators and annually, based on a stakeholder and business intelligence perspective; propose specific measures in the area of sustainability for decision in the Board of Directors.

4. MONITORING OF COMPLIANCE

VTL is following up on KPIs within all sustainability areas, which are presented in a "Annual Report" each year. VTL's Annual Report shall contain VTL's sustainability efforts and provides information to the extent necessary to understand VTL's development, performance, status and impact of its operations, at least in matters relating to environmental, social and human, respect for human rights and the fight against corruption and bribery.

