



STAKEHOLDER MANAGEMENT POLICY

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VINDHYA TELELINKS LIMITED

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VINDHYA TELELINKS LIMITED
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1. INTRODUCTION:

Vindhya Telelinks Limited (the “Company”) recognizes that effective stakeholder management is a crucial component of its business operation. In order to understand the needs of stakeholders and to involve them in managing risks and resolving conflicts, a systematic policy framework is felt necessary for identification and modes of engagement with the relevant stakeholders with the ultimate objective of having a long term social license to operate Company’s businesses in seamless manner.

2. SCOPE:

Each business segment in every operating location is required to carry out stakeholder engagement in accordance with the principles of this Policy with the intent to foster stakeholder relationships.

3. OBJECTIVE:

- (a) Ascertaining the nature of impacts on stakeholders, their legitimate concerns, interests and expectations as well as their potential influence on the Company by analysing the implications of those factors on business operations;
- (b) Embedding the principles of inclusiveness, transparency, materiality, completeness and cultural appropriateness in all its engagement activities;
- (c) To ensure the disclosure of information about the Company’s activities in a timely and culturally appropriate manner for an informed and meaningful engagement;
- (d) To ensure the stakeholder grievances are resolved in a timely and culturally appropriate manner;
- (e) Designing appropriate engagement methods and plans that meet international standards, are tailored to the stakeholders’ need and have well-defined objectives and outcomes that can be documented and monitored;
- (f) Promoting awareness of the principles and procedures for stakeholder engagement with employees at various levels of Company’s operations through training or communication;
- (g) Undertaking engagement in a non-discriminatory and interactive manner that encourages stakeholders to provide feedback;
- (h) To identify potential engagement risks.

4. STAKEHOLDER IDENTIFICATION AND PRIORITIZATION:

Relevant stakeholders are those individuals, groups of individuals or entities that affect and/or could be affected by an entity’s activities, products or services and by

the associated performance about the issues addressed by the engagement. An entity may have many stakeholders, each with distinct attributes and often with diverse and conflicting interests and concerns.

Establishing a methodology for systematically identifying stakeholder groups that can contribute to achieving the purpose of the engagement and/or could be affected by its outcome is fundamental to the engagement process.

A method for systematically identifying stakeholder groups is reasonably guided by following attributes:

- **Dependency** – groups or individuals who are directly or indirectly dependent on the entity’s activities, products or services and associated performance, or on whom the entity is dependent in order to operate.
- **Responsibility** – groups or individuals to whom the entity has, or in the future may have, legal, commercial, operational or ethical/moral responsibilities.
- **Attention** – groups or individuals who need immediate attention from the entity about financial, wider economic, social or environmental issues.
- **Influence** – groups or individuals who can have an impact on the entity’s or a stakeholder’s strategic or operational decision-making.
- **Diverse perspectives** – groups or individuals whose different views can lead to a new understanding of the situation and the identification of opportunities for action that may not otherwise occur.

Based on the above criteria, the Company has identified its key stakeholders as enlisted herein:

- Subsidiaries of the Company
- Shareholders
- Board of Directors
- Employees at all cadres and grades
- Contract workers deployed for outsourced jobs/service providers
- Suppliers & Vendors
- Professional & Consultants
- Community
- Bankers/Lenders
- Government and Regulators
- Industry Associations
- Trade Unions

5. STAKEHOLDER ENGAGEMENT PROCESS:

The Company promotes a culture of consistent engagement with every stakeholder group in order to improve its business processes. The stakeholder engagement process shall be subject to change as per the relevant circumstances. The basic overview of the engagement process shall take into consideration the profiling and mapping of stakeholders.

The engagement process shall further develop a clear understanding of who the relevant stakeholders are and how and why they may want to engage with the Company.

The Company shall strive to abide by the following principles when engaging with any stakeholder:

- **Inclusivity** - Inclusivity is the participation of stakeholders in developing and achieving an accountable and strategic response to sustainability. An inclusive entity accepts its accountability to those on whom it has an impact and who have an impact on it.
- **Materiality** - Materiality is determining the relevance and significance of an issue to an entity and its stakeholders. A material issue is an issue that will influence the decisions, actions and performance of an entity or its stakeholders.
- **Responsiveness** - Responsiveness is an entity's response to stakeholder issues that affect its sustainability performance, and is realised through decisions, actions and performance, as well as communication with stakeholders.

Common modes of engagement with Stakeholders:

The common modes of engagement with stakeholders shall, amongst other, be email communication, meetings, reports, website, etc.

6. STAKEHOLDER CONCERNS:

(a) **Grievance Redressal:**

The primary objective of Grievance Redressal is to formalize the management of grievances of both internal and external stakeholders and minimize the social risks to the business. The grievances, if any, will be managed internally with confidentiality with the aim to reduce conflicts and strengthen the relationship between the Company and its stakeholders. The Stakeholders may use the redressal channel as stated herein to raise their grievances in the absence of any specific mechanism in any other policy of the Company relevant to such grievances.

(b) **Definitions:**

- Grievance - An issue, concern, problem or a claim that a stakeholder wants to be addressed by the Company in a formal manner.
- Internal Stakeholders – Groups or individuals within a business who work directly within the business such as employees and contractual support staff.
- External Stakeholders - Groups or individuals outside a business who are affected in some way by the decisions of the business, such as investors, lenders, value chain partners, customers, community, media and the Government.

(c) **Grievance Redressal Channel:**

Stakeholders may register complaints by writing to the Company at headoffice@vtlrewa.com.

This above Policy may be reviewed as and when deemed appropriate by the Stakeholder's Relationship Committee of the Company.