



# ENVIRONMENTAL SOCIAL AND GOVERNANCE (ESG) POLICY



DEN Networks Limited (DEN/the Company) with its principle of “Serving Society through Industry” aims to align its operation with its impact on the Environment Social and Governance parameters. In order to promote sustainability, and long-term progress in the organization, the Company holds itself accountable for being solution-focused and incorporating ESG-related policies, procedures and best practices in the daily operations.

### **Purpose Statement:**

The Purpose of this ESG policy is to ensure that DEN operates in a responsible manner addressing and being prepared for any risk that may arise due to the ESG aspects while leveraging opportunities to create a sustainable future. With this policy, the Company also aims to extend its sustainable aspirations and its alignment across value chain.

The policy is aligned with the Company’s core principle of balancing its social, environmental and economic considerations in every decision that the Company takes.

### **Scope of the Policy**

This policy outlines our expectations for everyone who collaborates with us, including employees, contractors, and other partners in the value chain, as appropriate. The principles of this Policy will be applicable to all the Company’s operations and locations.

### **Alignment**

The Policy is aligned with the requirements of other Policies of the Company such as Company’s Code of Conduct, CSR policy. It also takes into the account framework laid down by the various statutory Act, Rules and Regulations envisaging the ESG principles as applicable to the Company.

### **Policy Commitment:**

#### **1. Environmental Responsibility:**

DEN is committed to meet the needs and expectation of different stakeholder by operating in an environmentally friendly way alongside accessing risks and opportunities that may impact the environment.

(i) **Waste Management and circular economy:** DEN acknowledges waste as a significant aspect and understands the need of proper waste management to combat harms of waste related pollution. To this end DEN shall:

- Make best efforts to reduce waste generation at source
- Work towards making a sustainable value chain for reuse of Set Top Boxes and promote circular economy
- Ensure compliance with all applicable laws related to waste management particularly but not limited to E-waste Management Rules.



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- Collect, Manage and Control various type of waste (Dry and Wet/ Hazardous and Non Hazardous) as per regulatory standards.
- (ii) **Energy and GHG Emissions Management:** DEN is mindful of the impact of its operations on the energy consumption and therefore on climate change. To this end, DEN shall:
- Ensure efficient energy use in all its operations
  - Adopt projects to foster energy conservation and efficiency
  - Incorporate good practices for more sustainable use of energy in day-to-day operations
  - Monitor carbon footprint, report and adopt actions to regulate and minimize it
- (iii) **Climate Change Adaption:** DEN understands that today globally every industry stands threats of climate change. To this end DEN shall:
- Work to improve its understanding of the climate risks and their implications on the company operations
  - Identify the physical effects of climate change on the business operations and implement appropriate adaptation strategies
- (iv) **Supply Chain Management and Procurement:** DEN understands the importance of sustainable supply chain for growth and sustenance of the business. To this end, DEN shall:
- Create a supply chain that is resilient and viable in presence of risks and opportunities
  - Put in place supplier selection and Categorization process which defines the minimum ESG requirements or threshold for all our suppliers.
  - Provide guidelines for suppliers to align to DEN's ESG goals and to adopt similar ESG standards in their own supply chain.
  - Identify practices of suppliers that paramount to the Company's sustainability.
- (v) **Environment Protection and Pollution Prevention:** DEN recognizes the significance of combating pollution and its detrimental impacts on the ecosystem. The Company strives to promptly and efficiently tackle pollution caused by its activities, encompassing air, water, land, and noise pollution. Accordingly, DEN shall:
- Implement measures to reduce pollution at its source to mitigate the adverse effects on air, water, noise, and land.



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- Abide by all pertinent legal regulations related to pollution prevention and control at all its locations, and periodically monitor compliance as applicable.
  - Collaborate with and support programs that promote the development of biodiversity and floral/faunal ecosystem developments.

## **2. Social Responsibility:**

DEN is conscious of the responsibility it has towards the different stakeholders. To that the Company is strongly committed to:

- (i) **Customer need satisfaction:** Customers are the biggest driving factor to DEN's operation and their user satisfaction is critical to the Company's success. To this end, DEN shall:
  - Continuously monitor client needs through different platforms like surveys, questionnaires etc.
  - Find creative/innovative ways to better address customer needs
  - Attend to customer queries and focus on long term relationship building with the customer
  - Work on continuously improving the customer experience
- (ii) **Data Security and Privacy:** DEN reorganize customer privacy as a human right and is committed to maintaining highest level of protection and adoption of best practices in the industry. DEN shall:
  - Follow all applicable data protection legislation.
  - Process personal data at the same level of protection as it does for the Company's data.
  - Provide configuration and data security controls as per the best practices followed in the industry.
  - Document the configuration and controls in the respective product documentation.
- (iii) **Employee Health, Safety and Well Being:** DEN identifies health of the employee (both mental and physical) as an important aspect of the growth. To this end DEN shall:
  - Conduct awareness programs and trainings on Occupational Health and Safety.
  - Provide a safe, healthy, clean and ergonomic working environment
  - Conduct activities for employee engagement during festival etc.
  - Provide employees with programs, policies that extend healthy well-being beyond occupation related ill health.

- (iv) **Diversity, Inclusion and Equal opportunities:** DEN is committed to providing an inclusive and welcoming working environment for all the members of the community. To this end, DEN shall:
- Ensure employment decisions are promoting diversity and are based on qualification and individual ability.
  - Not -discriminate based on race, caste, religion, colour, ancestry, status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other legally protected category.
  - Provide an environment of equality and respect for all employees and contractors.
  - Provide equal opportunities with equal pay for differently abled individuals as feasible within Company operations.
  - Create accessible infrastructures for differently abled persons as per applicable laws and regulations.
- (v) **Employee engagement:** DEN reorganize employee engagement programs as key to their development and business performance. To this end, DEN shall:
- Identify and conduct training and development programs for enhancing employee's skill and career growth.
  - Engage with employees through various means like surveys to identify and understand Employee's Satisfaction level and work on gap areas
  - Have a leave policy to allow employee to pursue a passion or community interest
  - Settle grievances in a fair, equitable and timely manner
- (vi) **Grievance Redressal:** DEN aims to create trust and transparency by strengthening the grievance redressal procedures within the Company for both external and internal stakeholders. To this end DEN shall:
- Establish processes and point of contact for submission, assessment and resolution of issues, concern, problem or claim by individual or community.
  - Identify and establish escalation matrix and turnaround time for resolution of all kinds of complaints in an efficient manner.
  - Maintain a grievance register to document all concerns
  - Work to fill the gaps within operations and processes to reduce the number of grievances received each year.

(vii) **Human Rights:** DEN is committed to upholding fundamental rights in line with the legitimate role of business of all stakeholders. To this end, DEN shall:

- Not employ children at all workplaces.
- Ensure no form of forced labour.
- Comply with all applicable laws and respect internationally recognized human rights
- Take strict action against discrimination, harassment, retaliation, hostile, intimidating or offensive behaviour of any kind

(viii) **Stakeholder Engagement:** Stakeholder engagement is a crucial aspect of our business operations as it helps businesses build strong relationships, understand the needs and concerns, and create value for all parties involved. To that end DEN shall:

- Identify and prioritize stakeholders, including employees, customers, suppliers, investors, communities, and regulators. Understand the needs, interests, and concerns of each stakeholder group and develop a strategy for engaging with them.
- Establish regular communication channels with stakeholders to ensure that they are informed about relevant issues and developments.
- Encourage feedback and participation from stakeholders and provide opportunities to them to express their views, suggestions, and concerns.
- Use stakeholder feedback to inform decision-making processes, including ESG-related policies and practices.

### 3. **Governance and Leadership:**

To achieve its mission of long-term value generation and promoting sustainability, DEN has invested highly in strong governance, moral business practices, and careful risk management.

(i) **Anti-Bribery and Anti-Corruption:** DEN take zero tolerance approach to bribery and corruption. To this end, DEN shall:

- Provide training to employees on regular interval starting from the onboarding stage.
- Commit to prevent, deter, and detect bribery and other corrupt behaviours and be governed by Code of Conduct on severe consequences of violations
- Act professionally, fairly and with integrity in all its business dealings

(ii) **Cybersecurity and Systemic Risk:** DEN understands the level of systemic risk that may arise in case of large scale weakening or collapse of

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technological systems. To ensure that the risk is properly addressed, DEN shall:

- Insure that resilient and reliable infrastructure is in place
  - Address business continuity risks as per Company's ERM
  - Maintain information security and data privacy through protection from unauthorized access and threats
  - Align to organization's Information Security Policy
- (iii) **Legal Compliance:** DEN is committed to comply with all legal requirements in the region it operates. To this end, DEN shall:
- Setup a legal team to update and help comply different departments on the legal requirements
  - Take legal advise from an external consultant whenever and wherever required
  - Document proof of compliance as per the legal requirements
- (iv) **Anti-Fraud:** DEN condemns misuse of any products and processes. To this end DEN shall:
- Use all tangible and intangible corporate assets, including computer and communication equipment, for the purpose for which they are granted and to run the business.
  - Undertake appropriate measures to urge employees to report fraud, suspected fraud and fraud-prone locations without fear of being negatively impacted in any form.
- (v) **Public Advocacy:** DEN is dedicated towards socio economic development that creates a shared value for all. To this end DEN shall:
- Collaborate with associations and governments for decision making on important matters related to the sector in which it operates
  - Best utilize its expertise in the sector for common good.
  - Take up public advocacy positions whenever possible with sound and strong corporate governance.
  - Ensure ethical and responsible advocacy actions under an internal governing body for any kind of public consultations.
- (vi) **Competitive Behaviour:** DEN works on the concept of fair trade and competition. To this end, DEN shall:
- Ensure that the products/ services are provided to the consumer on the most favourable term
  - Act independently to any other competitor while being innovative and effective in providing the service.



(vii) **External Assurance and Disclosure:** DEN strives to be transparent in its ESG progresses and disclosures. It identifies the significance of the same for its stakeholders and from a regulatory point of view. To this end DEN shall:

- Report on ESG alignment with BRSR
- Be transparent in the disclosures linked with ESG reporting
- Decide on ESG strategy and deliverable against the same
- Comply with SEBI guidelines on Assurance of BRSR, as applicable.

### **Monitoring and Reporting:**

This Policy will be reviewed as and when required but atleast once in three years.

### **Changes to this Policy**

Any subsequent amendment / modification in the governing Act(s)/Rules/Regulations or re-enactment, impacting the provisions of this Policy, shall automatically apply to this Policy and the relevant provision(s) of this Policy shall be deemed to be modified and/or amended to that extent, even if not incorporated in this Policy.

### **References**

This overarching ESG policy is supported by underlying policies and statement relating to our employees, including but not limited to: • Code of Conduct • Nomination and Remuneration Policy • Equal employment opportunity • Code of Fair Disclosure • Vigil Mechanism • Privacy Policy

*(This Policy was approved by the Board of Directors at its Meeting held on October 13, 2023.)*