

Scaling Sustainably

**Responsible by Choice.
Sustainable by Design.**

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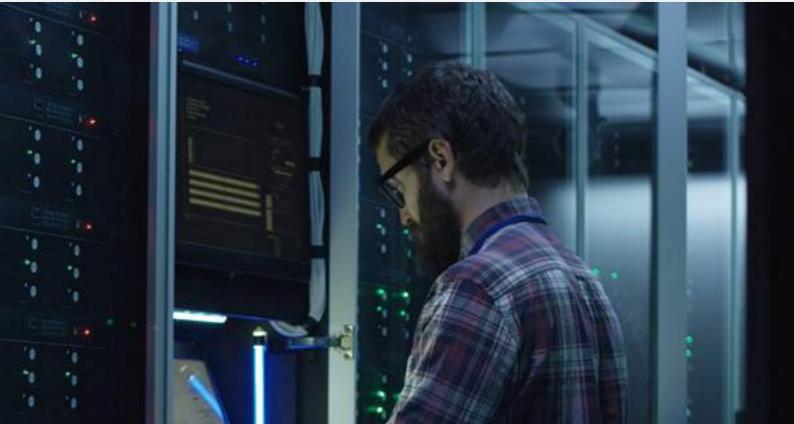
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About the Report

We are delighted to present our Sustainability Report for FY 2023-24, which serves as our primary communication with stakeholders. This report aims to provide a balanced and accurate reflection of our strategy and performance across economic, environmental, social, and governance dimensions. It underscores our commitment to transparency and responsible corporate citizenship, offering insights into our sustainability initiatives and their impact on various stakeholders.



Reporting Period and Boundaries

This report covers our non-financial/ESG performance for the period from April 1, 2023, to March 31, 2024. It encompasses all operations of Nxtra in India, providing a detailed account of our initiatives and their impact.

Reporting Principle and Framework

This Report has been prepared with reference to the Global Reporting Initiative (GRI) Standards 2021 and covers Nxtra's contributions towards the United Nations Sustainable Development Goals (UN SDGs). The Report also has aligned with the Task Force on Climate-related Financial Disclosures (TCFD) framework, underscoring our ongoing commitment to addressing climate change. For easy reference, the GRI Index is provided at the end of this Report, summarising Nxtra's reporting disclosures.

Read more on
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Guiding Principles (GP)

Strategic focus and future orientation

Across the report

Connectivity of information

Across the report

Stakeholder Relationships

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Materiality

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Conciseness

Across the report

Reliability and Completeness

Across the report

Consistency and Comparability

Across the report

Assurance

The information presented in this Report has undergone a thorough review process, in accordance with internal review and control measures. Additionally, it has been audited by an independent agency SGS India Private Limited. Assurance was performed in accordance with ISO 14064:3-2019 standard and AA1000v3 (Moderate type 2) accounting standard. Assurance statement from an independent agency is attached at the end of this Report.

Read more on
[Page 126](#)

Stakeholder Feedback

We welcome and value any constructive input and feedback from stakeholders.

Email - ESG@nxtra.in.



To view or download our online reports, please log on to www.nxtra.in/esg

Key ESG Highlights

Leading the Way in Sustainability



41%

Increase in use of renewable energy



~4%

Reduction in Scope 1* and 2 emissions with base year as FY 2020-21

* - Excluding fugitive emissions



30%

Increase in share of women in workforce



0.025

Total Recordable Incident Rate



75%

Non-Executive Directors on Board



99%

Local Procurement

About Nxtra

Intelligent by Design. Sustainable by Choice.

At Nxtra, we don't just build data centres, we craft tomorrow's digital-first ecosystem. With expertise in the data centre and telecom sector for more than two decades, we specialise in designing, building and operating the largest network of smart, resilient and sustainable data centres in India across 120+ locations, serving hundreds of customers spanning enterprises, hyperscalers, governments, SMEs, OTT and CDN. Apart from the current infrastructure, we have an aggressive data center expansion plan to support the digital growth of our customers. In the next three years, we will launch multiple new hyperscale data centers across key metro cities and will increase the existing capacity by 2X to over 400 MW.



Our mission of building future-ready infrastructure revolves around two pillars: **Intelligence and Sustainability**. Intelligence that is not only about adopting cutting-edge technologies, but also empowering customers; the astuteness to deliver bespoke solutions for our customers' unique needs with the most diverse set of people skills and capabilities around design, build, operations and more.

Intelligent infrastructure forms our core. Our future-ready, digitised data centers are:

Engineered to accommodate high density AI workloads and withstand disruptions, guaranteeing uninterrupted services even amid the most challenging circumstances.

Scalable with modular design approach, allowing seamless infrastructural expansion when required.

Ready to provide a hyperconnected ecosystem with a robust global and Indian network footprint, offering low latency, carrier dense and comprehensive interconnect services.

Leveraging AI to build predictive maintenance capabilities, improve operational and energy efficiency, streamline automation of operations and optimise capex utilisation.

Along with our pursuit of intelligence lies our commitment to sustainability. With an ambition to reach net-zero by 2031, adopting innovative green energy, water and waste management technologies are not just an afterthought for us but are integral to our data center designs and operations from day 1. We are integrating energy-efficient cooling systems and harnessing new-age renewable energy sources, including hydrogen ready fuel-cell technology to minimise our environmental footprint while meeting the eco-conscious demands of today's customers.

With Nxtra, customers don't just get the resilient DC infrastructure but a smarter, greener way to be future-ready!

12
Large data centres[#]

400,000+
RKM^s of fibre network in India[#]

120
Edge data centres[#]

400,000+
RKM^s of global submarine network^{**}

6
New hyperscale data centres[#]

* Route Kilometers
These figures are w.r.t Bharti Airtel Group company

Leadership Message

Towards a Digital and Sustainable Future

Dear Stakeholders,

As we co-create our ecosystem with digital living permeating every aspect of our existence, consumer behaviour patterns dictate hyper-personalised services and offerings on-demand. It is no wonder that businesses are in a rush to build digital-first ecosystem, to remain competitive. Simultaneously, the escalating demands of AI worldwide, predict extensive growth in data centre storage capacity from 10.1 zettabytes (ZB) in 2023 to 21.0 ZB in 2027, a five-year CAGR of 18.5%. With data centre capacity poised to double by 2026, a critical concern is also the parallel rise in power consumption, globally.

Being one of the leaders in the data centre space, we are deeply cognizant of building intelligent infrastructure deeply rooted in sustainability which supports our clients' journey to digital maturity. Hence, prioritising the digital needs of businesses, we find the right balance between innovation and sustainability – intelligently architected green infrastructure design, build and operations.

To this end, we not only hold ourselves to the highest standards in sustainable growth but we actively engage with our diverse stakeholders to drive meaningful change. Leading with integrity and operating in a structured framework with measurable goals, we envision a future where our communities flourish and businesses operate with purpose.



“

The future of data centers lies in our ability to harmonise intelligent infrastructure with sustainability. By integrating ESG initiatives into our business model, we are not just enhancing our operational efficiency; we are paving the way for a more sustainable digital economy. ”

Ashish Arora

Whole-time Director and Chief Executive Officer (CEO)

In line with our goals, our second ESG report touches upon key metrics and initiatives that indicate our progress towards building a positive sustainability index. Here are some of the highlights from last year-

Environment

We are an environmentally responsible brand and are advancing towards the adoption of renewable energy solutions, optimising resource use and championing energy-efficient practices to build a better future for all. We are now also a member of the UN Global Compact, a prestigious voluntary initiative dedicated to advancing universal sustainability principles and supporting the UN Goals, furthering our dedication to responsible business practices and enhancing the quality of life for the society at large.

Reflecting on our commitment to sustainability, we made substantial strides last year towards reaching our net-zero target by 2031.

- Used 220,541 MWh renewable energy in operations, 41% higher than last fiscal year
- Increased our contracted renewable energy portfolio to more than 427,859 MWh, including six new projects
- Reduced Scope 1 and 2 emissions by ~4% compared to base year FY21 despite an increase of 25% in power consumption
- 95% of waste disposed through government authorised vendors

Social

We operate with a people-first philosophy, dedicated to attracting and nurturing best in-class talent through the continual cultivation of a strong set of employee well-being practices and values that are inherent to our organisational culture. With a robust EHS framework our health and safety protocols, we provide our employees and workers with a safe as well as engaging work environment. Focusing on diversity, equity and inclusion, we equip our talent to expand and

“

As we navigate the complexities of the digital age, our commitment to sustainability is not just an afterthought; it is an integral part of our data center design, building and operations from day one. We are dedicated to build future-ready digital infrastructure, the sustainable way. ”

Rajesh Tapadia

Whole-time Director and Chief Operating Officer (COO)



maximise their full potential while advancing in their career of choice. We also realise the importance of building an equitable society so that upcoming generations have a broader spectrum of choices when embarking on a career path and have the skills to build a better life for themselves.

Some of our key achievements include:

- A TRIR of 0.025 with zero fatalities and 4,355,782 safe-man hours in construction as a result of a robust EHS programme governed by a three-level audit assurance system
- 30% rise in the representation of women in the workplace and the introduction of NxtWave initiative, our capability development programme for women in engineering
- Launched NxtLearn platform to address diverse learning needs, providing tailored training content to support professional development
- A 30% increase in Corporate Social Responsibility expenditure, promoting education for underprivileged students in rural areas.

Governance

At the core of our operations lies a steadfast commitment to exemplary governance. We prioritise transparency and ethical conduct in all our activities, while maintaining strict adherence to our guiding principles. This extends beyond our internal processes

and performance indicators and is embedded into our value chain, ensuring sustainable action, physical and cyber security, and regulatory compliance, maintaining the highest standards of customer satisfaction.

Some of our key achievements include:

- 75% of the board consists of Non-executive Directors with zero conflicts of interest
- We launched ESG Learning initiatives (ELI), offering specialised training programmes and seminars focused on ESG principles
- Promotion of responsible sourcing with 99% local procurement

- We continue to maintain compliance with international standards including ISO 27001, SOC1 and SOC2, PCI-DSS, among others.

We will continue our endeavour towards not only building intelligent and sustainable data centres but to also extend these values, resources and capabilities to the larger community, fostering an environment of growth, health, security and stability. As we look in to the future, we will continue to prioritise innovation, collaboration and responsible practices to ensure that we strive towards our sustainability goals.

With immense gratitude, we acknowledge the unwavering support and trust from our customers, suppliers, partners, communities and colleagues. Although the journey toward achieving our ESG goals is long and winding, we are confident that our collective efforts will forge a sustainable future for the Indian and global community. It is our belief that together, we will bring about transformative impact.

Regards,

Ashish Arora
Whole-time Director and CEO

Rajesh Tapadia
Whole-time Director and COO

Stakeholder Engagement

We believe that consistent and effective stakeholder engagement is crucial to our business success. Our aim is to build meaningful relationships with our stakeholders, founded on trust, respect and transparency. We actively engage with them, address their concerns and keep them informed about organisational decisions. Our stakeholder engagement framework ensures the timely communication of accurate and relevant information, facilitating ongoing interaction with each stakeholder.

Stakeholder Engagement Framework

Our stakeholder engagement framework is designed to foster open communication, build trust and promote collaborative relationships. This approach ensures that we address the needs and concerns of all our stakeholders effectively.



Primary Policy Objectives



Assimilating stakeholder concerns and interests and framing required policies and processes



Ensuring quality communication clarity, accessibility, relevance and timeliness



Bolstering stakeholder trust and confidence in processes, decisions and actions

Stakeholder Identification and Prioritisation

At Nxtra, our stakeholder engagement process follows AccountAbility's 1000 standards, particularly the AA1000 series.

Identifying and Categorising Key Stakeholders



Our Stakeholders



Customers



Regulators



Investors



Employees



Non-profit Organisations



Communities



Media



Suppliers and Partners



Customers

Prioritising our customers is central to driving our success as their continuous demands fuel our strong revenue growth. We are committed to enhancing our offerings based on their needs and the evolving dynamics of the industry.



Needs and expectations

- Enhanced value-added offerings
- Prompt resolution of inquiries and complaints
- Proactive communication on relevant programmes and services

How we engage

- Customer satisfaction surveys
 - Email and SMS communication
 - Interactions via company website and social media platforms



Investors

Investors provide us with access to financial resources through equity and debt funding. They also play a crucial role in increasing demand for our shares, significantly influencing our market capitalisation.



Needs and expectations

- Accurate and timely information about our Company's financial performance
- Sustainable growth prospects and long-term value creation

How we engage

- Annual general meeting
- Media briefing
- Analyst briefings
- Quarterly earnings calls



Regulators

Regulatory bodies formulate laws and regulations that we must comply with in our daily activities, providing essential frameworks for regulatory disclosure that instill confidence in our other stakeholders.



Needs and expectations

- Adherence to legal and regulatory requirements within specified timelines
- Conducting operations transparently
- Compliance with environmental laws and regulations
- Prompt payment of taxes

How we engage

- Through meetings, presentations and networking activities
- Routine visits and inspections
- Annual and quarterly compliance reports



Employees

Our employees are equipped with the necessary skills and expertise to drive essential operations and enhance supporting business processes. They play a crucial role as enablers of our growth, contributing to our sustainable performance and continuous value creation across our organisation.



Needs and expectations

- Collaborative opportunities with government and other NGOs
- Platforms for networking
- Guidance and support in strategic planning

How we engage

- Forming partnerships to support shared goals and initiatives
- Providing financial support
- Directly engaging with stakeholders



Non-profit Organisations

Non-profit organisations play a crucial role in addressing societal needs and fostering positive change without pursuing financial gain. Collaborating with government bodies and educational institutions allow them to tackle key challenges and enhance their impact on society.



Needs and expectations

- Inclusive, transparent and safe work environment
- Stable employment
- Recognition, rewards and appreciation for achievements
- Career advancement opportunities within the Company

How we engage

- Yearly employee feedback survey
- Routine employee communication sessions
- Town hall meetings
- Conferences, workshops, seminars and training sessions



Media

Media, as a stakeholder for a company, plays a crucial role in shaping public perception, influencing investor sentiment and impacting brand reputation. They serve as a bridge between the Company and the public, conveying information, opinions and news about the organisation.



Needs and expectations

- Fair and objective reporting
- Timely and accurate information about our Company

How we engage

- Press releases and media advisories
 - Press conferences and briefings
 - Media tours and site visits
 - Exclusive interviews and background briefings
 - Webinars and virtual press events



Communities

Communities form an essential part of our social fabric and we recognise our responsibility to contribute to their socio-economic well-being. As stakeholders in our Company, communities play a pivotal role in shaping our operations and impact.



Needs and expectations

- Direct investment in community projects and initiatives
- Sponsoring educational programmes and scholarships
- Youth-specific training and apprenticeship programmes

How we engage

- CSR volunteering activities
- Evaluation of the results achieved through Bharti Foundation's interventions



Suppliers and Partners

Suppliers and partners are integral to our operational ecosystem, forming essential pillars of our business network. We prioritise collaborative and mutually beneficial relationships with our suppliers and partners to ensure sustainable growth and success.



Needs and expectations

- Equitable margins
- Revenue expansion
- Enduring partnerships
- Reliable suppliers
- Sustainable sourcing

How we engage

- On-boarding process
- Online/offline workshops
- Collaborative portals
- Supplier and partners feedback surveys

Materiality Assessment

As we navigate change and foster growth, we remain committed to purpose-driven profitability. Our strategic frameworks empower us to explore business opportunities, create stakeholder value and maintain a balanced liquidity position. By continuously assessing stakeholder needs and addressing operational challenges, we ensure our ability to maximise value creation. Notably, materiality analysis plays a pivotal role in engaging with Nxtra's stakeholders, aligning with our Company's business strategy and promoting sustainable long-term value.



Nxtra has determined key material topics that fall within five impact areas.



Nxtra's Approach and Process

Identification

Identifying material topics, along with their associated risks and opportunities, is crucial. We base this assessment on global standards and mega trends, while ensuring active stakeholder inclusion. Our ultimate goal is to align these material topics with Nxtra's overarching objectives.

01

Prioritisation

Prioritising material issues in line with internal stakeholder perspectives is essential. We categorise these issues based on their relative importance to stakeholders.

02

Validation

To refine the material issues, we employ a rigorous validation process in close consultation with Nxtra's senior management. This collaborative approach ensures that our identified material topics are well-founded and aligned with our strategic objectives.

03

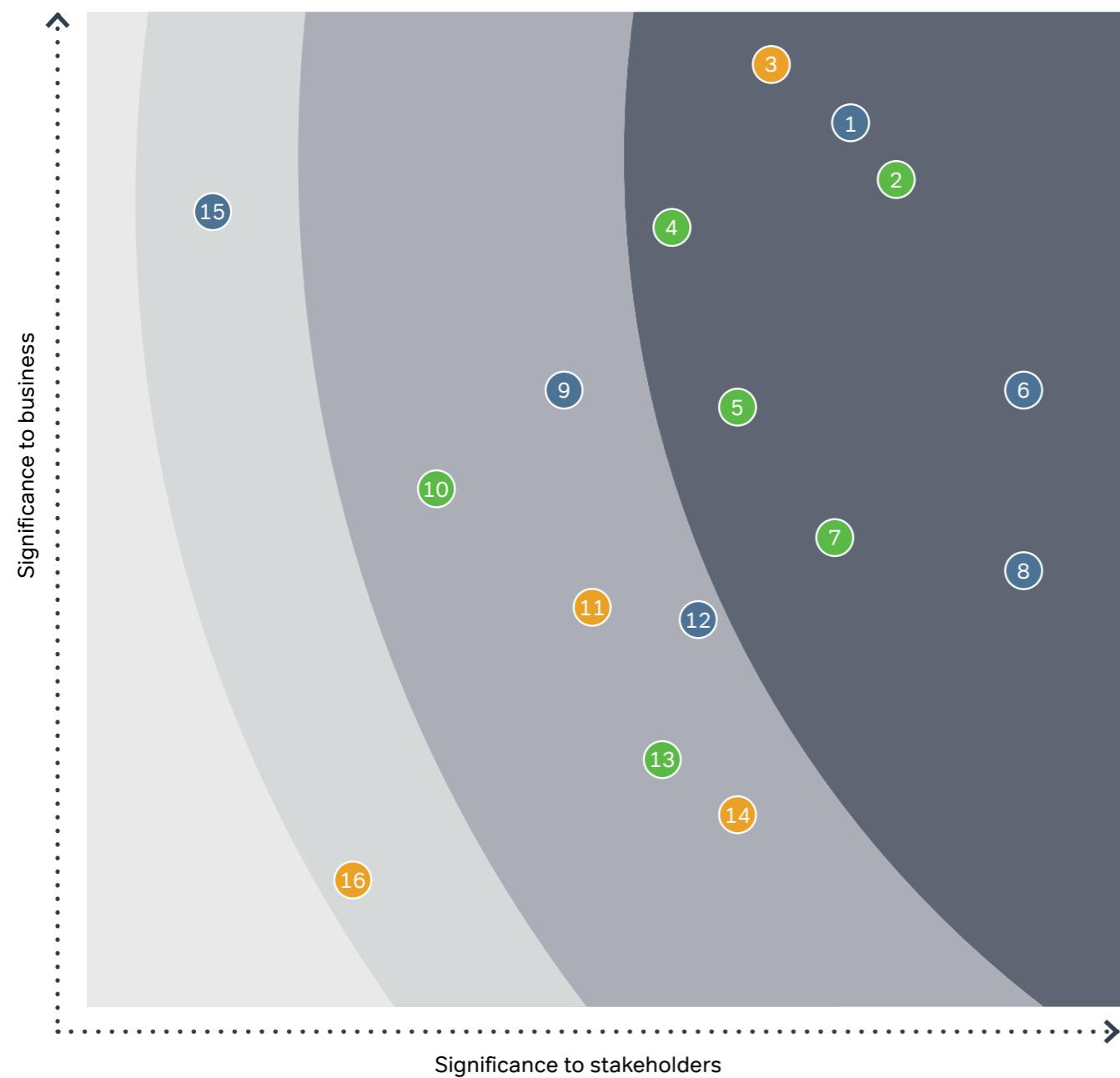
Disclosure

Communicate the materiality matrix to relevant stakeholder groups and other audiences through various channels ensuring transparency and engagement.

04



Materiality Matrix



Critical
 High
 Moderate
 Low

R Risk
O Opportunity

Material Issues

The identified material issues have further been aligned with Sustainable Development Goals that relate most closely to Airtel's business and vision.

1	Data Security and Privacy ↗	R			
2	Waste Management ↗	O			
3	Employee Health and Safety ↗	R			
4	Energy Management ↗	O			
5	Water Efficiency ↗	O			
6	Regulatory Compliance ↗	R			
7	Climate Strategy ↗	O			
8	Sustainable Supply Chain Management ↗	O			
9	Customer Experience ↗	O			
10	Green Building and Materials ↗	O			
11	Human Capital Management ↗	O			
12	Corporate Governance and Business Ethics ↗	R			
13	Carbon Emissions ↗	R			
14	Diversity, Equity and Inclusion ↗	O			
15	Systematic Risk and Crisis Management ↗	R			
16	Community Engagement ↗	O			
					
					

Advancing Our ESG Commitments

We uphold rigorous oversight to track progress and ensure alignment with our objectives. This proactive approach enables us to swiftly adapt to evolving challenges and seize opportunities, fostering ongoing enhancement in our performance and societal impact.

Environment

Material Issues	Commitments	Targets	FY 2024 Performance
	Develop a climate change adaptation, mitigation and resilience strategy to promote responsible business practices along with future-ready climate-resilient infrastructure	Adopt the TCFD framework to understand potential of climate-related risks and opportunities as well as implement its recommendations	Conducted an in-depth risk assessment to identify climate-related physical risks that can potentially damage assets or disrupt our supply chain

	Adopt innovative technologies to maximise energy efficiency, increase green energy mix and improve grid reliance	<ul style="list-style-type: none"> Achieve a 10% reduction in PUE by FY 2024-25, with FY 2020-21 as the base year 70% renewable energy consumption for our core data centers by 2027 	<ul style="list-style-type: none"> 10% improvement in PUE for our core data centers including new data centers delivered in last 12 months All our core data centers are ISO 50001:2018 certified Renewable electricity share increased to 38.3% for core data centers 220,541 MWh renewable energy used
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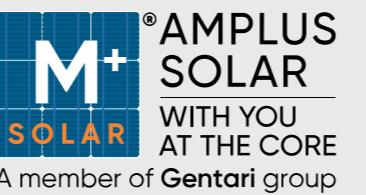
	Reduce direct (Scope 1) and indirect (Scope 2 and 3) GHG emissions	Reach Net Zero by 2031	<ul style="list-style-type: none"> Reduced Scope 1 and 2 emissions by ~4% compared to base year FY21 despite an increase of 25% in power consumption 163,788 tCO₂e emissions saved via various initiatives
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	Reduce Nxttra's water footprint and create Zero Liquid Discharge (ZLD) DCs through efficient water management practices	<ul style="list-style-type: none"> Achieve 100% wastewater recycling in hyperscale DCs to become 'Water Neutral' Track and reduce Water Usage Effectiveness (WUE) in hyperscale DCs through technological interventions 	<ul style="list-style-type: none"> Conducted water stress analysis during site selection for new data centres to effectively balance water demand and supply Established partnerships for the implementation of advanced sewage treatment plants, rainwater harvesting systems and real-time monitoring of water usage and quality Initiated the real time tracking and monitoring of Water Usage Effectiveness (WUE) across all our hyperscale DCs
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Material Issues	Commitments	Targets	FY 2024 Performance
	Adopt 3R approach of Reduce, Reuse and Recycle to minimise waste across all DCs	<ul style="list-style-type: none"> Attain a 100% landfill diversion rate within the next five years Enhance waste categorisation, reporting and maintaining 100% compliance with waste related regulations 	<ul style="list-style-type: none"> 95% waste disposed through government authorised vendors 1,970 metric tonnes of waste recycled
	Utilise sustainable construction practices and environment-friendly materials to minimise the environmental impact of upcoming data centers	<ul style="list-style-type: none"> Enhance end-of-life management of assets by enhancing resource efficiency and material usage Design all new DCs to attain LEED/IGBC platinum/gold certification 	<ul style="list-style-type: none"> All of our hyperscale data centers are IGBC Gold certified Mix design adopted for new projects by replacing up to 25% of cement with fly ash
	Attract and retain talent aligned with the organisation's values and vision, accelerating their growth through training and career development	<ul style="list-style-type: none"> Create employment opportunities for talent from Tier II and III cities in India Ensure that 100% of site infra managers at edge sites are ex-servicemen Maintain an employee engagement survey score above 80% 	<ul style="list-style-type: none"> Achieved an Employee Engagement Score of 86.4 against 100 Zero grievances filed related to sexual harassment, discrimination at workplace, child labour or any other human rights related issues. Launched NxtLearn platform to address diverse learning needs, providing tailored training content and supporting professional development. 80% of all site infra managers at edge sites are ex-servicemen
	Foster a diverse and inclusive workplace that facilitates opportunity and respect, focusing on gender, cultural and generational inclusion	<ul style="list-style-type: none"> Create a culture of inclusion aligned with the group's 'Airtel for All' initiative Double gender diversity in our workforce within three years with FY 2022-23 as the base year 	<ul style="list-style-type: none"> Launched NxtWAVE (Nxttra Women Advancing in Engineering), a strategic programme aimed at cultivating a new generation of female talent 30% increase in share of women in workforce

Material Issues	Commitments	Targets	FY 2024 Performance	Material Issues	Commitments	Targets	FY 2024 Performance
 Employee Health and Well-being	Become industry-leader in achieving exemplary EHS practices at all operation and construction sites, prioritising worker welfare	<ul style="list-style-type: none"> Maintain zero TRIR and fatalities for Nxtra's projects as well as operational DCs Conduct safety induction and hazard-specific training for all relevant employees Incorporate digitisation to minimise operational uncertainty and enhance EHS performance 	<ul style="list-style-type: none"> Zero fatalities 4,355,782 safe-man hours in construction ISO 45001 occupational health and safety (OH&S) certification for all core DCs 	 Systematic Risk and Crisis Management	Identify, assess and effectively manage risks associated with the widespread breakdown or failure of critical financial, natural resource and technological systems	<ul style="list-style-type: none"> Evaluate risks that could potentially disrupt business activities Strengthen Nxtra's overall risk management framework 	Identified critical ESG risks and implemented actionable mitigation plans, ensuring a resilient and secure business environment
 Community Engagement	Cultivate partnerships to aid the development of local communities, minimise negative impacts and leave a positive legacy	<ul style="list-style-type: none"> Make socially and environmentally conscious investments in communities where we operate Partner to support skill development and job training programmes for marginalised communities 	<ul style="list-style-type: none"> 30% increase in the CSR expenditure Partnered with Bharti Airtel Foundation to support the Satya Bharti School Created positive impact for 6,072 students at 3 schools 	 Sustainable Supply Chain Management	Maximise sustainable impacts through resilient and responsible supply chain practices and partnerships	<ul style="list-style-type: none"> Incorporate ESG frameworks and criteria into pre-qualification and supplier agreements Encourage suppliers to adopt climate-related commitments 	<ul style="list-style-type: none"> 99% local procurement 30+ suppliers attended ESG awareness sessions 100% of strategic suppliers have acknowledged and accepted Human Rights Policy 100% of suppliers have signed the Supplier Code of Conduct
<h2>Governance</h2>				 Data Security and Privacy	Maintain a robust Information Security Policy and System covering all stakeholders in the value chain	Set industry benchmarks with the latest physical and digital infrastructure to secure data centre operations and applications	<ul style="list-style-type: none"> Adopted seven layers of physical security across all core and hyperscale DCs Maintaining Payment Card Industry Data Security Standard (PCI DSS), SOC 1 & SOC 2 Type II (including SSAE) for all of its core data centres Information security risk assessment and recovery strategy, certified by ISO 27001 and 22301 standards
 Corporate Governance and Business Ethics	Reinforce the organisation's commitment to operate with fair, transparent and ethical governance practices	<ul style="list-style-type: none"> Augment diversity in the Boardroom Operate with fair, transparent and ethical governance practices Non-Executive Board Chairman Zero complaints regarding conflict of interests 	<ul style="list-style-type: none"> 75% Non-Executive Directors (including one Independent Director) 	 Customer Experience	Build strong partnerships to deliver consistently high customer satisfaction	<ul style="list-style-type: none"> Attaining optimum customer loyalty and trust. Ensure high customer satisfaction levels Conduct third-party surveys to obtain unbiased ratings 	<ul style="list-style-type: none"> Adopted intelligent simulation tool to cater AI-ML workloads Adopted 6-parameter strategy to enhance customer satisfaction(Sustainable, Reach, Hyper-connect, Scalable, Responsive and Reliable) Utilised the digital platform Airtel Thanks Business (ATB) for customer engagement. 24/7 customer support and service resolution by N-care team
 Regulatory Compliance	Maintain compliance w.r.t statutory bodies, municipal corporations and central and state government(s) among others	<ul style="list-style-type: none"> Maintain compliance with annual certification on the Code of Conduct Maintain 100 percent compliance with all the applicable laws and legislations in operational areas 	<ul style="list-style-type: none"> Compliance Monitoring System, a workflow-based online risk assessment tool, to assign, track and record compliance and assessment-related activities 100% stakeholders attained annual certification on the Code of Business Conduct 				

Collaborations



Awards



'Green Data Center of the Year' award at ASSOCHAM's 6th edition of the India Smart Datacenters and Cloud Infrastructure Summit 2024



Sustainability Champions Awards at Net Zero Alliance 2024





Environment

Responsible Choices

Material Issues

Climate strategy	Carbon emissions	Energy management
Waste management	Water efficiency	Green building and materials

Stakeholder



Investors



Regulators



Customers



Suppliers and Partners



Climate Strategy

Accelerating Climate Action with Agility



With escalating climate crisis, actions cannot wait. Urgency grips us, compelling transformative solutions that transcend mere management. At Nxtra, we stand at the forefront, harnessing the power of emerging technologies to confront this challenge head-on. With every step, we carve a path towards sustainability, forging resilience in the face of adversity. Our commitment runs deep, fuelled by a passion to protect our planet for generations to come.



Achieving net zero is a collective effort that starts with our energy choices. By prioritising renewable sources, we are not only transforming our operations but also setting a standard for the industry to follow.

Sindhu Sharma
Head - ESG



Solar carport installed at Pune-II DC



220,541 MWh

Renewable energy used (166% increase from FY 2020-21 baseline)



~4%

Reduction in scope 1 and 2 emissions compared to the baseline



8,080 MWh

Electricity savings through Energy Conservation Measures (ECM)

Future-proofing our Data Centres – Adapting and thriving

As global temperatures continue to rise, data centres face the looming threat of operational disruptions. Therefore, it has become urgent than ever to develop effective cooling solutions and robust contingency plans.

Our commitment to sustainability and innovation drives us to implement cutting-edge climate strategies, ensuring resilience and efficiency in our data centre operations.

By monitoring climate trends and developing adaptive measures, we are not only addressing current challenges but also paving the path for a more sustainable future in data centre management.

Climate Risk Assessment and Mitigation Strategy

We are committed to setting new industry benchmarks in addressing climate risks aligning with the Task Force on Climate-related Financial Disclosures (TCFD) framework. We have conducted an in-depth risk assessment to identify climate-related physical risks arising from both acute events and long-term changes in climatic patterns that can potentially damage assets or disrupt our supply chain.

Identified Physical Risks

01 Acute Physical Risks



Floods



Cyclones



Droughts

02 Chronic Physical Risks



Temperature variations



Changes in precipitation patterns



Water stress



Solid oxide fuel cell based hydrogen-ready power plant at Bengaluru DC

To understand the potential impact of these physical risks on our operations, we performed a detailed scenario analysis. This analysis allowed us to take proactive measures in high-risk areas, ensuring uninterrupted business operations over the short, medium and long term.

Scenario Analysis Details

01 Flood and Drought Risks



Assessed using the WRI Aqueduct tool under baseline scenarios.

02 Cyclone Risks



Identified using methodologies from the National Disaster Management Authority (NDMA), based on historical data.

03 Water Stress Risks



Analysed using the WRI Aqueduct tool across three scenarios:



Pessimistic
(SSP5
RCP8.5)



Optimistic
(SSP1
RCP2.6)



Business
as Usual
(SSP3 RCP7.0)

We are currently in the process of developing a robust mitigation and adaptation plan to address these identified physical risks at our data centre facilities. This plan aims to enhance our resilience and ensure the sustained functionality of our operations despite escalating effects of climate change.

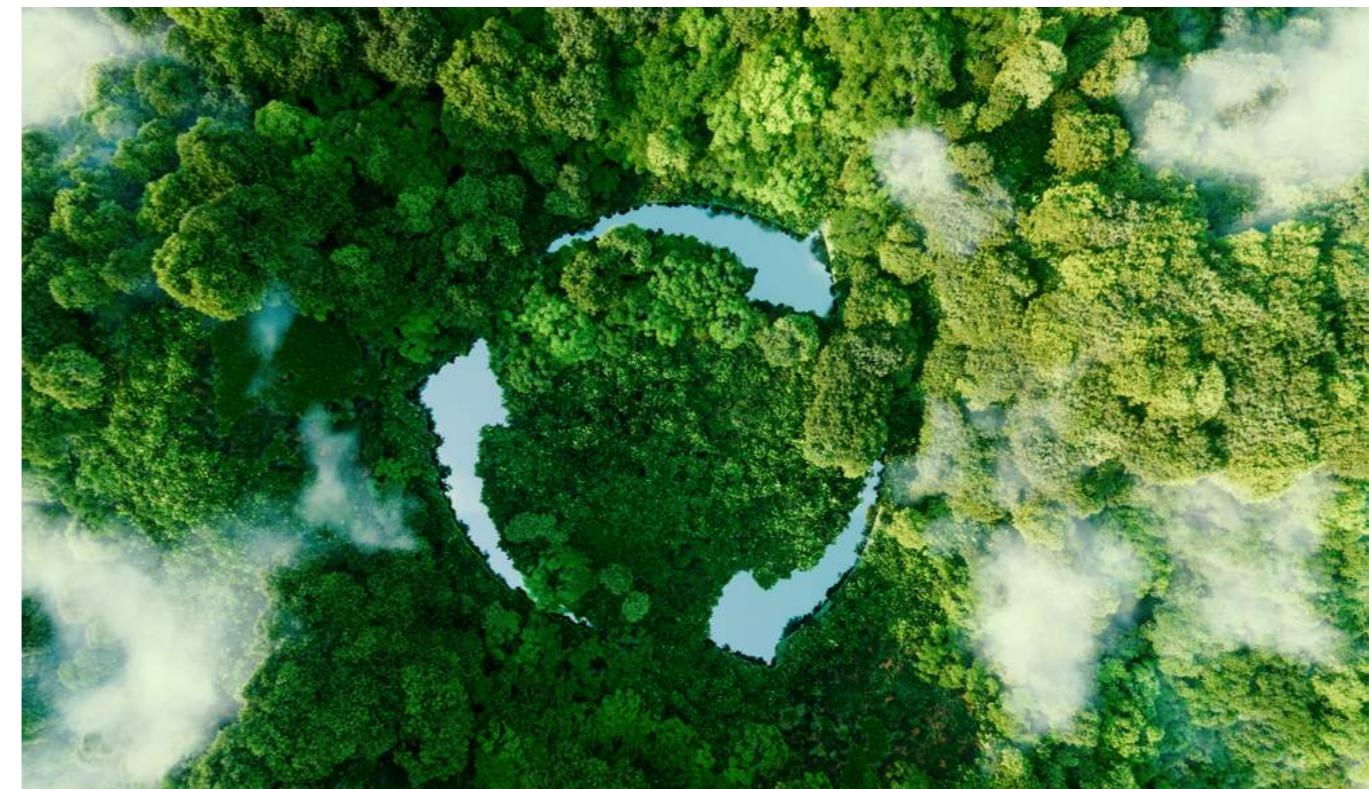


Our Journey to Net Zero

Recognising the significant impact of data centres due to their energy-intensive operations and resulting carbon emissions, we remain steadfast in our commitment to proactively manage and reduce our carbon footprint. Through diligent assessment, transparent reporting and targeted reduction initiatives, we aim to lessen our impact on the environment effectively.

Our Company's unprecedented growth, both as a business and within the industry, presents unique challenges in meeting carbon reduction targets. However, we are undeterred in our commitment and have adopted various innovative initiatives to decrease emissions. Additionally, we have set ambitious Net Zero goals and are on a mission to reduce our emission intensity each year, while significantly increasing our investments in environment-friendly and clean energy sources to support our operations.

We are committed to achieving net zero emissions for our operations at the entity level by FY 2031. Additionally, we are actively pursuing validation of our Greenhouse Gas (GHG) emissions reduction targets through the Science-based Targets initiative (SBTi). This demonstrates our dedication to driving sustainable, long-term growth. At the group level, we are committed to reducing Scope 1 and 2 GHG emissions by **50.2%** by FY 2030-31, using FY 2020-21 as the base year, in line with SBTi recommendations.



Carbon Emissions

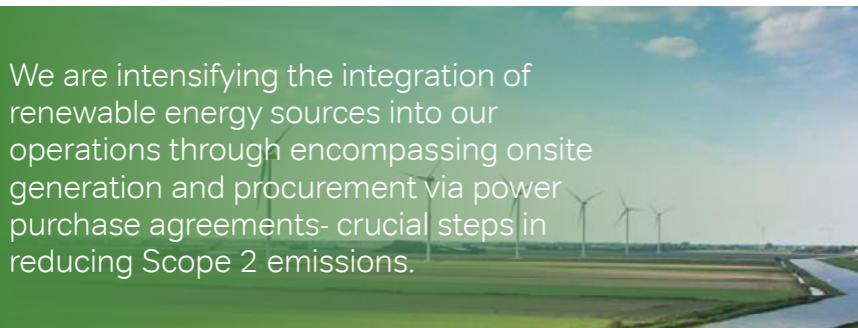
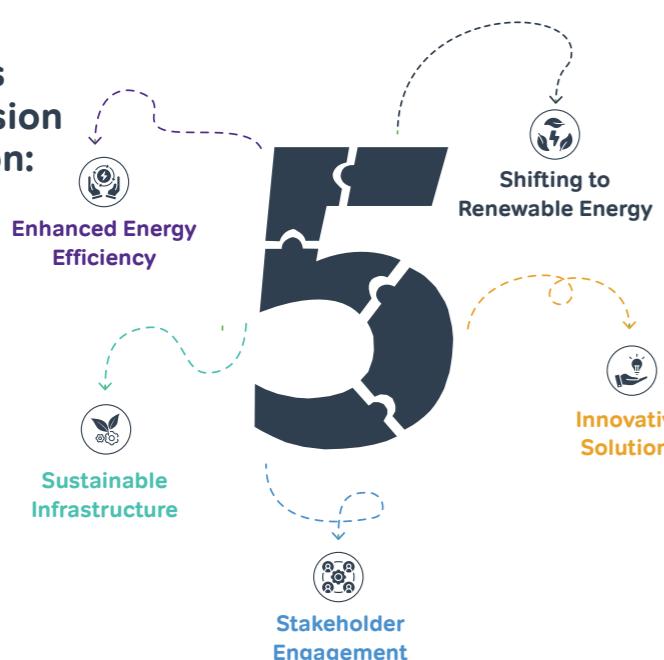
The Blueprint for Achieving Zero Emissions



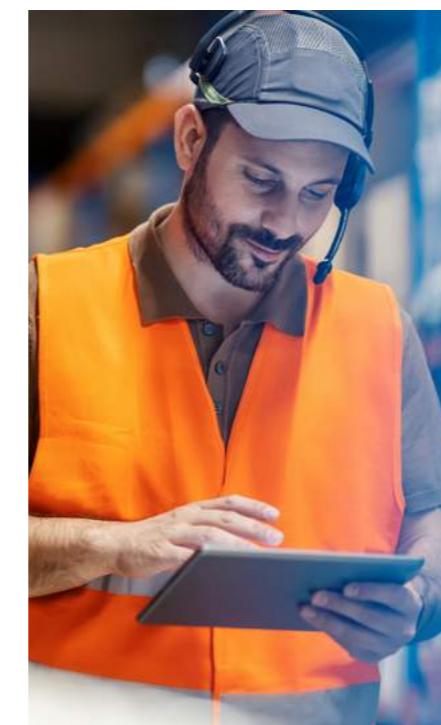
At the core of our sustainability ethos is a dedicated decarbonisation plan that evaluates new technologies and processes to reduce carbon emissions across both demand and supply sides. These initiatives highlight our unwavering commitment to combating climate change and securing a sustainable future. Despite the complexities that arise with rapid expansion, we are steadfast in our pursuit of carbon reduction goals.

We are forging multiple partnerships and collaborations to incorporate new technologies into our operations. These strategic alliances enable us to leverage the latest advancements

Top 5 Priorities for Emission Reduction:



We are intensifying the integration of renewable energy sources into our operations through encompassing onsite generation and procurement via power purchase agreements- crucial steps in reducing Scope 2 emissions.



in green technology, enhancing the efficiency and sustainability of our data centres. Our investments in green initiatives have reached an all-time high, reflecting our dedication to making our data centres as environment-friendly as possible.

Our Net Zero roadmap prioritises GHG emission reductions and mitigation within the value chain, avoiding reliance on offsets. We rigorously track Scope 1, 2 and 3 emissions annually to assess our progress. Additionally, we ensure the verification of our GHG emissions and the entire sustainability report in compliance with the AA1000 AS v3 (2020) Type 2 assurance standard.

Furthermore, we are committed to evaluating and implementing energy efficiency measures across our facilities and operations. This involves optimising cooling systems, upgrading to highly energy-efficient equipment and adopting industry-leading practices in energy management.

Moreover, we actively collaborate with suppliers and partners to identify emission reduction opportunities throughout our value chain. Sustainability assessments and the promotion of eco-friendly practices are integral to achieve our environmental goals.

Lastly, we are optimising our transportation and logistics processes to mitigate emissions associated with business travel, employee commuting and goods transportation. This includes advocating fuel-efficient vehicles, alternative transportation modes and advanced logistic strategies. Together, these measures drive us closer to achieving our environmental targets.

Emissions and Growth: Balancing Expansion with Responsibility

We have made significant strides in reducing our Scope 1 and 2 emissions in FY 2023-24, which have decreased by ~4 % compared to the base year i.e. FY 2020-21. This achievement is largely attributed to our ongoing efforts to increase the share of renewable energy in our overall electricity mix. Our total Scope 1 and 2 emissions amounted to 442,345 tCO₂e, resulting in an emission intensity (Scope 1+2) of 13.3 tCO₂e per installed tile space.

Our Scope 3 emissions totaled 145,448 tCO₂e, representing a considerable reduction from the last fiscal year. We recognise the importance of engaging with our value chain to effectively reduce Scope 3 emissions. To this end, we are actively promoting various emission reduction initiatives through collaboration across our value chain, aiming to both lower our Scope 3 emissions and enhance the accuracy of our emissions data.

In FY 2023-24, our overall emissions, encompassing Scope 1, 2 and 3, have slightly increased compared to the last fiscal year. This rise is primarily due to the unprecedented growth of both our Company and the industry and no change in the national grid emission factor. However, we remain committed to reducing our emissions and addressing climate change with urgency and resolve.

Scope 1, 2 and 3 emissions (tCO₂e)

Scope 1*

FY24		13,971
FY23		13,667
FY22		10,453

Scope 2

FY24		428,374
FY23		420,678
FY22		461,221

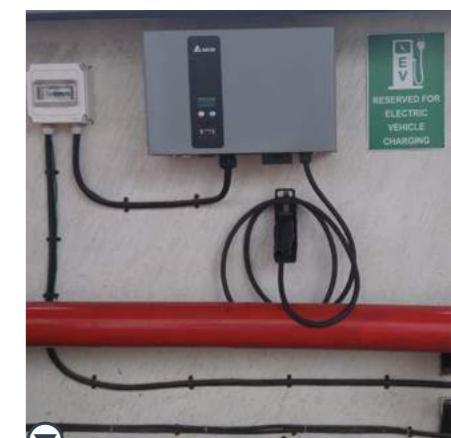
Direct greenhouse gas emissions that are produced from sources within Nxtra's ownership or control, along with indirect greenhouse gas emissions that result from the generation of electricity that Nxtra purchases and uses.

Scope 3



	FY22	FY23	FY24
01 Capital goods	24,243	26,836	18,861
02 Fuel and energy related activities not included in scope 1 or scope 2	162,086	124,801	126,035
03 Waste generated in operations	24	89	54
04 Business travel	59	269	154
05 Employee commuting	305	299	344

* - Excluding fugitive emissions



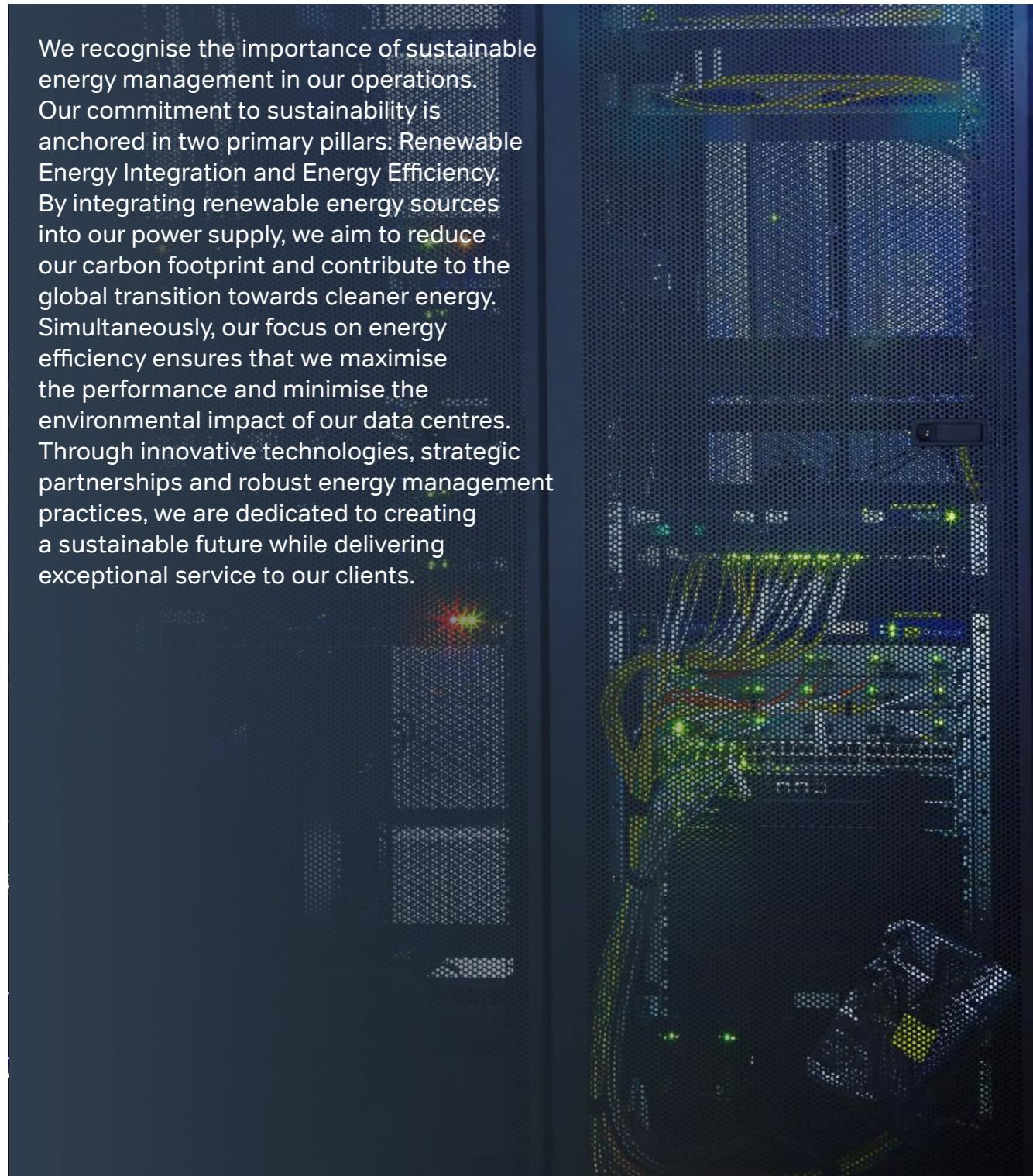
EV Charging station at one of our hyperscaler

Energy Management

Advancing Sustainability: Our Energy Management Strategy



We recognise the importance of sustainable energy management in our operations. Our commitment to sustainability is anchored in two primary pillars: Renewable Energy Integration and Energy Efficiency. By integrating renewable energy sources into our power supply, we aim to reduce our carbon footprint and contribute to the global transition towards cleaner energy. Simultaneously, our focus on energy efficiency ensures that we maximise the performance and minimise the environmental impact of our data centres. Through innovative technologies, strategic partnerships and robust energy management practices, we are dedicated to creating a sustainable future while delivering exceptional service to our clients.



Energy Efficiency

We ensure that all our data centres meet stringent energy efficiency standards. We deploy advanced technologies to enhance overall reliability and performance, thereby reducing downtime and simultaneously improving customer experience. By increasing energy efficiency, we maximise the capacity of our data centres without the constant need for infrastructure expansion, resulting in better space utilisation and reduced capital expenditures. Additionally, our energy conservation measures have proven advantageous, enabling us to manage increasing workloads without a corresponding exponential increase in energy consumption.

Nxtra's focus areas include



Maximising design efficiency in our state-of-the-art data centres



Investing in comprehensive training and development programmes for our teams



Harnessing energy-efficient equipment to power our operations sustainably



Consistently optimising operational requirements to minimise resource consumption and maximise efficiency



Aligned with our guidelines for operating data centres, we utilise efficient cooling systems and optimise lighting, including installation of LED with motion detection, to minimise energy consumption. We have secured certifications for our robust management systems that we have implemented to enhance our environmental performance.

All our core data centres are:

ISO 14001:2015

Environmental Management System (EMS)

ISO 50001:2018

Energy Management System (EMS)

Demand-side Interventions

01

Efficient Cooling Systems

Implemented cutting-edge cooling techniques, including hot/cold aisle containment and economisers, to enhance cooling efficiency by precisely directing airflow and minimising energy waste.

02

Energy-efficient Hardware

Introduced state-of-the-art equipment that adheres to industry standards. By minimising power consumption, we have achieved greener and more sustainable data centre operations.

03

Optimised Data Centre Layout and Design

Carefully planned the layout to ensure efficient airflow and heat distribution. This strategic design reduces the reliance on excessive cooling, resulting in energy savings.

04

Smart Lighting Solutions

Installed LED lighting with motion sensors. This intelligent system activates lighting only in areas where needed, minimising unnecessary energy usage.

05

Regular Maintenance and Upgrades

Consistently performed maintenance and upgrades ensure all systems are running optimally. This approach reduces inefficiencies and the risk of failure.

06

Predictive Analytics

Leveraged predictive analytics to forecast cooling demand accurately. By pre-emptively adjusting cooling systems, we promote energy conservation.

07

Employee Awareness and Training

Conducted awareness and training sessions for our operations and project teams on best practices concerning energy efficiency. Fostering a culture of conservation ensures every team member at Nxtra contributes to our sustainability goals.

08

Certification Achievement

We have secured ISO 50001:2018 certification for our Energy Management System (EnMS) across all core data centres. This demonstrates our commitment to responsible energy use.

09

Rack Layout Optimisation

Strategically arranged racks to eliminate hotspots and promote uniform airflow. This has resulted in improved cooling efficiency and reduced energy consumption.

10

Remote Management Efficiency

Utilised remote monitoring and management tools, reducing the need for on-site personnel. This approach further reduces energy usage associated with physical presence.



Aforesaid energy conservation measures contributed to the reduction of 8,080 MWh cooling power and prevented 5,786 tCO₂e emissions in FY 2023-24.



High-efficiency Power Distribution Units (PDUs)

As part of our end-of-life process, we have implemented state-of-the-art Power Distribution Units (PDUs) at select data centres. These units enable precise tracking, control and regulation of power consumption in server farms, both locally and remotely. By enhancing efficiency, reliability and overall performance, they contribute to reduced carbon emissions and cost savings.



Enhancing Efficiency and Sustainability with Dual Fuel Kits

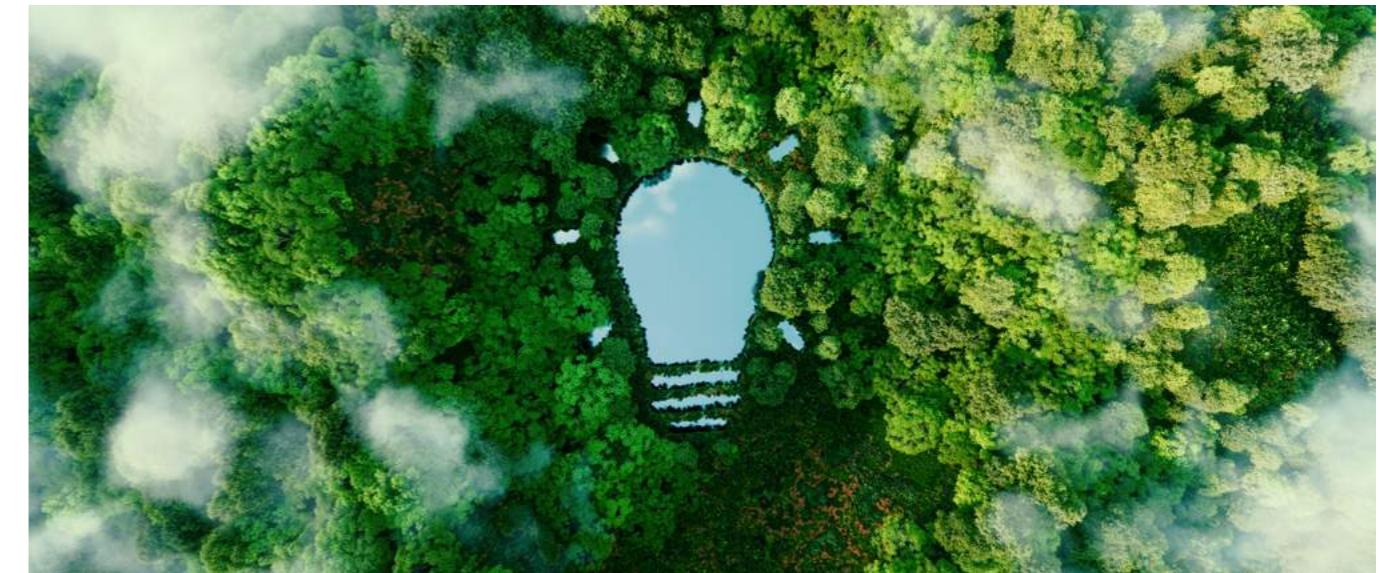
Implementation of Dual Fuel Kits (Fumigation Type) in our diesel generators (DGs) is underway to optimise fuel consumption, reduce emissions and enhance efficiency. The kits initially utilise diesel fuel, with gaseous fuel acting as a supplementary source, optimising fuel consumption and reducing environmental impact. The introduction of gaseous fuel into the combustion chamber enhances combustion, boosting power output while maintaining efficiency. The Electric Control Unit (ECU) monitors engine parameters, adjusting gaseous fuel injection for optimal combustion and maximising efficiency as well as performance.

Power Usage Effectiveness (PUE)

Power Usage Effectiveness (PUE) is a powerful metric that helps in evaluating data centre energy efficiency and offers valuable insights into our power resource utilisation.

Compared to the previous fiscal year, we have realised a significant 10% improvement in the average Power Usage Effectiveness (PUE) for our core data centres including in the new data centers delivered in last 12 months. This enhancement has allowed us to augment our infrastructure and bolster our operational efficiency.

We have set an ambitious target to further diminish our PUE by an additional 10% before 2025, using the fiscal year 2020-21 as the baseline year. This objective will be achieved through a holistic strategy encompassing energy conservation initiatives, such as the adoption of energy-efficient equipment, pioneering designs, technological solutions and operational enhancements driven by digitisation and IoT integration.



Tomorrow Begins Today

We are revolutionising our data center designs to seamlessly integrate AI workloads, ensuring unparalleled flexibility and resilience in our future data centres.



Civil

- High Structural Floor Loading to accommodate the taller and denser racks
- More slab-to-slab height to give ample space for designing primary/ secondary cooling loops
- Avoiding raised floor tiles and deployment on true floor



Electrical

- Onsite GIS Substation for high Scalability
- Modular components to create diverse density on the floor PODS
- Buffer space on each floor to accommodate extra utility infrastructure



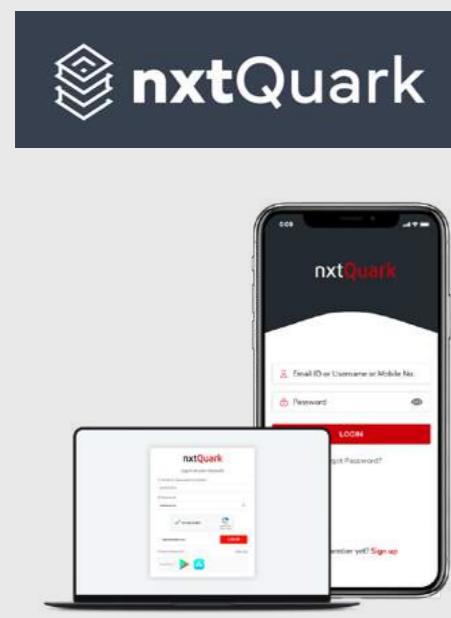
Cooling

- Chiller and distribution piping in the loop and to each floor
- Workable proof of concept with multiple OEMs on DTC and Liquid immersion cooling both (1 Phase and 2 Phase)
- Relationship/Knowledge sessions with a larger ecosystem supporting liquid cooling

NxtQuark-

Redefining Maintenance Efficiency with Automation

Driven by our dedication to operational excellence, we have developed nxtQuark- a next-generation tool designed to elevate maintenance management within our data centres. This cutting-edge solution represents a paradigm shift, streamlining maintenance activities ranging from routine checks to escalation management, heralding a new era of resource optimisation.



User-centric Interface Design

Prioritising Usability: The nxtQuark tool ensures a user-friendly interface tailored for technicians and administrators, facilitating seamless operations.

Intuitive features: Key features include intuitive navigation, clear layout and contextual prompts for enhanced usability.

Customisable dashboards: Users benefit from personalised dashboards and robust reporting, enabling tailored access to relevant information.

Enhanced Efficiency through Automation

Automated Routine Maintenance Tasks: The tool automates routine maintenance tasks, ensuring timely execution and adherence to schedules without manual intervention, reducing the risk of oversight.

Preventive Maintenance Schedules- Leveraging predefined criteria, nxtQuark generates preventive maintenance schedules automatically, enhancing equipment reliability by addressing potential issues proactively.

Swift Escalation Management- Automated escalation protocols swiftly address critical concerns, minimising downtime and mitigating risks.

Paperless Operations

Addressing paperwork challenges: General maintenance, preventive tasks, checklists and escalation procedures are digitised across all data centres.

Real-time Accessibility: Technicians can access digital checklists, log real-time maintenance activities and escalate issues within the application, streamlining operations and reducing administrative overhead.

Reduction of Human Labour and Errors

Lesser Reliance on Manual Labour- By automating tasks, the tool reduces reliance on manual labour. This frees up human resources to focus on more strategic initiatives.

Error Mitigation- nxtQuark integrates built-in validation checks and error detection mechanisms, ensuring data accuracy and integrity, thereby reducing errors in manual entry and documentation.

Revolutionising Data Centres with Renewable Energy

At Nxttra, we understand that sustainable energy solutions are crucial for meeting our operational demands and fulfilling our environmental responsibilities. Our dedication to renewable energy is evident in our comprehensive strategy, which includes diverse renewable energy installations, strategic long-term partnerships and substantial investments in sustainable infrastructure.

We have set an ambitious target to achieve **70% renewable energy consumption for our core data centres by 2027**. This goal will be realised through several key initiatives, including sourcing renewable energy via open access mediums through long-term Power Purchase Agreements (PPAs), installing captive solar PV plants at our data centres, commissioning fuel cell-based captive power plants, and retrofitting HSD-based backup power generators with gas-based systems. In FY 2023-24, **38.3%** of the total electricity consumed in Nxttra's core data centers was sourced from renewable energy sources. By leveraging these sustainable energy sources, we aim to significantly reduce our environmental footprint while ensuring reliable and resilient power supply for our data centres.

In addition to these measures, we are committed to continuous advancement. We consistently evaluate and implement innovative technologies to enhance our renewable energy strategies, ensuring that we remain leaders in sustainable practices.



41%

Increase in use of renewable energy from FY 2022-23

In FY 2023-24, we have substantially increased our renewable energy usage, sourcing **220,541 MWh** through green power wheeling agreements and captive solar rooftop plants. These efforts have resulted in saving approximately **157,907 tCO₂e** emissions in the same fiscal year. Additionally, in collaboration with the Airtel group, we have invested in **14** companies to develop renewable power plants, enabling the sourcing of over **427,859 MWh** of green energy for our data centres. Furthermore, rooftop solar plants have been installed at both core and edge data centres, covering **29** locations.



Energy Consumption

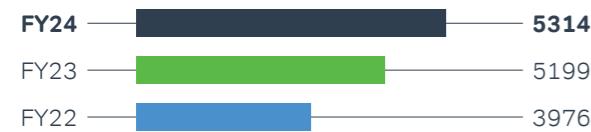
Grid Energy

(in MWh)



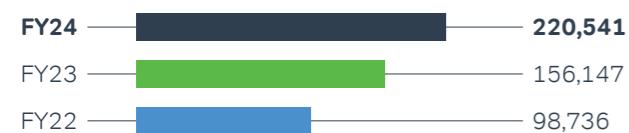
Diesel

(in KL)



Renewable Energy

(in MWh)



Renewable Energy

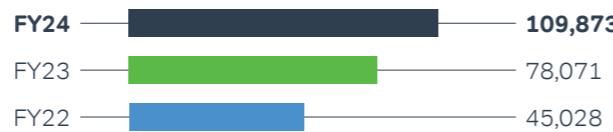
Core Data Centers

(Values in MWh)



Edge Data Centers

(values in MWh)



Energy Intensity in FY 2023-24

Total electricity consumption including Renewable Energy

Total fuel consumption

2,947,786 GJ

191,942 GJ

Total energy consumption (A+B):
3,139,728 GJ



95 GJ/installed rack

GJ/installed rack

Energy intensity per rack (Total energy consumption/ installed tile space)



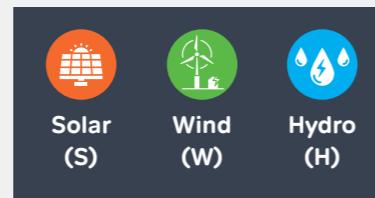
Green Energy Portfolio

Energising the Future Sustainably

Committed to incorporating sustainable practices through renewable energy initiatives, we recognise their pivotal role in reducing carbon emissions and shaping a cleaner, more sustainable future. In the FY 2023-24, we contracted six new projects dedicated to sourcing 167,066 MWh of renewable energy annually.

We are making long-term investments to bring more carbon-free electricity for our data centers, onto the grids where we operate and continue to advocate for the expansion of clean energy solutions for the industry.

We are also optimally utilising the space at our data centers by installing captive clean energy projects including fuel cell, solar rooftop, solar car park among others.



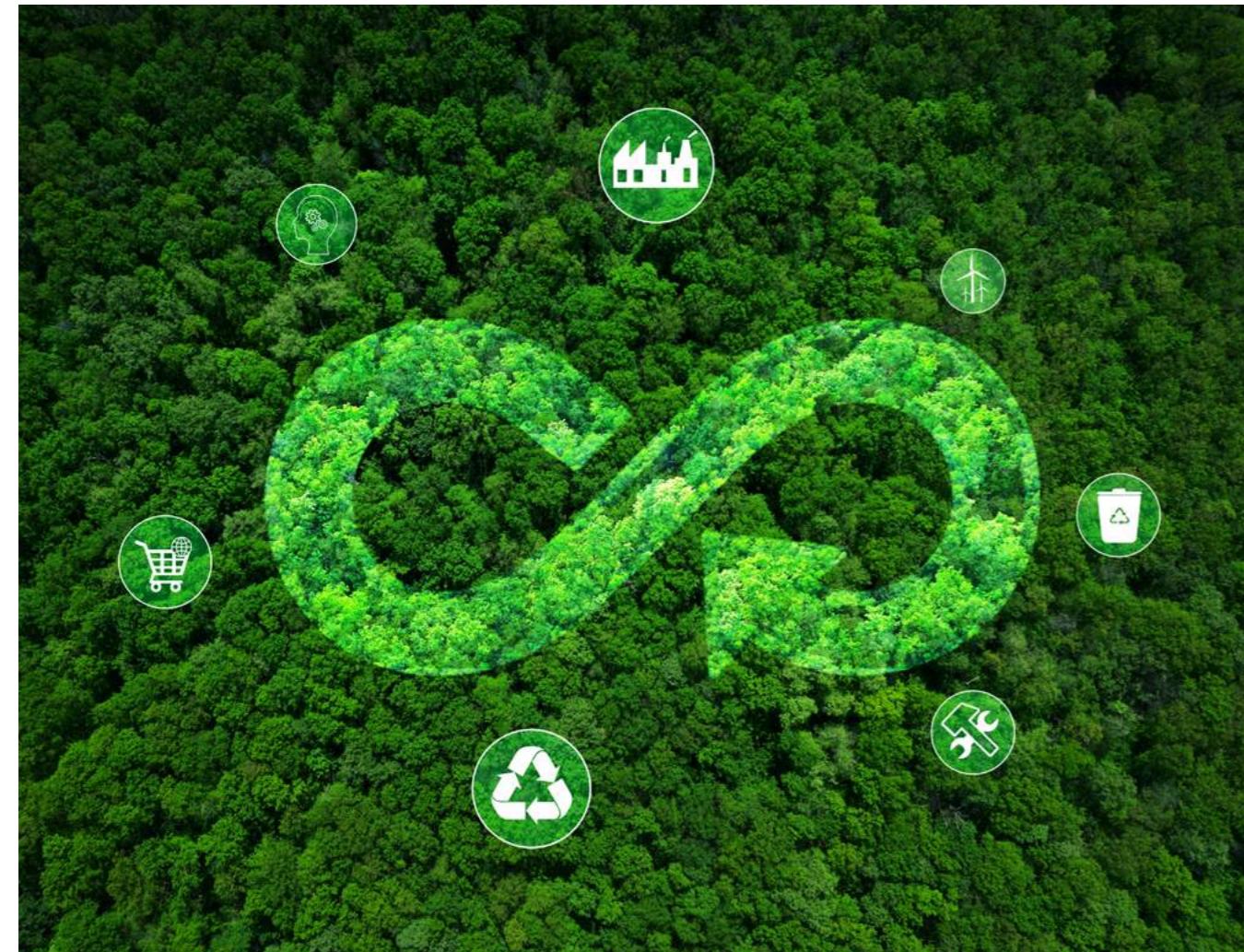
Waste Management

Waste Management Redefined



We recognise the detrimental impact of waste on our environment and the necessity of transitioning towards a circular economy. To address this, we have adopted proper waste management practices to enhance our resource utilisation and reduce waste.

Besides diligently adhering to all waste management principles and complying with regulatory frameworks, we protect the environment and ensure that our operations are sustainable and ethical. This commitment helps us retain the trust of our stakeholders and demonstrates our dedication to environmental stewardship.



95%

Waste disposed to government authorised vendors

1,970 metric tonnes

of waste recycled

Championing Responsible Waste Management for a Cleaner, Greener World

Proper waste management plays a crucial role in curbing the environmental footprint of any operation. By prioritising waste management, companies can ensure that valuable resources within waste are efficiently recycled or reused, thereby reducing waste and promoting sustainability. Moreover, adhering to legal requirements not only encourages responsible business practices but also mitigates legal risks. In addition to this, it demonstrates our commitment to environmental stewardship and responsible corporate behaviour.

We address this challenge head-on with a comprehensive waste management framework that prioritises reduction, reuse and recycling strategies to minimise waste and its environmental impact. We adhere to a 100% 'green interconnectedness' philosophy by following the 3R approach—Reduce, Reuse and Recycle. This approach allows us to minimise

waste generation while continuing to deliver uninterrupted services to our customers.

We have adopted an eco-conscious approach to waste management. To ensure responsible waste disposal, we discard our waste through government-approved recyclers, vendors, refurbishes

and scrap dealers. We have also entered into agreements with government approved recyclers to dispose of hazardous wastes such as lube oil, transformer oil, grease and lubricants separately. We also stay informed about industry-best practices and continually enhance our waste disposal processes to uphold the highest industry standards.



Our approach to achieving resource circularity includes



Transitioning from a linear to a circular model, which significantly reduces waste and decreases ecological impact for the same level of output.



Striving to enhance asset efficiency and extend asset life by adopting innovations in resource efficiency and digitisation for effective predictive maintenance.



Minimising office waste, primarily organic and paper waste, and reducing the environmental impact of soil, stones and gravel excavation during the construction of new data centres.



Focusing on key areas of circularity, including e-waste and hazardous waste management.

At Nxtra, we are committed to promoting resource optimisation by giving products a second life wherever possible, reducing raw material consumption and encouraging the reuse of components.

Our goal is to achieve a 100% landfill diversion rate within the next five years by minimising waste generation and adopting comprehensive, circular disposal practices. We are dedicated to tracking all waste leaving our data centers and ensuring it is disposed of sustainably, rather than ending up in landfills.

Waste Management Strategy



Waste Inventory and Tracking

We maintain a comprehensive waste inventory and tracking system, ensuring efficient management of various waste categories.



Regulatory Compliance

We periodically submit requests for the disposal of hazardous wastes and other waste types, adhering to regulatory requirements to ensure our operations remain compliant with legal standards.



E-waste and Battery Waste Disposal

We auction e-waste and battery waste, along with non-hazardous wastes such as metal scrap and machinery/asset scrap, to government-authorised vendors and registered scrap dealers.



Hazardous Waste Disposal

Other hazardous wastes generated, including oil, grease and lubricant, is responsibly disposed of through government-approved recyclers. We maintain long-term agreements with these recyclers, ensuring consistent and responsible waste management.

Installation of Incinerators for Dry Waste Disposal

At Nxtra, conventional waste management practices primarily involve selling waste to authorised vendors. However, while we effectively handle certain categories of waste and dry waste, including paper, cardboard, pantry material and tissue paper, it often ends up in landfills or informal dumping sites. This significantly impacts the environment and increases greenhouse gas emissions.

To avoid this, we have now proposed the installation of small incinerators for dry waste disposal.

These incinerators will provide a safe and environmentally responsible method for disposing of dry waste, reducing our carbon footprint and mitigating adverse impacts on the ecosystem.

This initiative will minimise our carbon footprint, protect the environment and help create a cleaner world.



State-of-the-art Waste Incinerator at our Mumbai data centre

Digital Platform for end-to-end Traceability of Waste

We understand the necessity of comprehensive waste management practices to ensure compliance, reduce environmental impact and optimise resource utilisation. Traditional methods formerly in practice lacked traceability, real-time monitoring and data consolidation, leading to inefficiencies and potential malpractices.

To address these concerns, we plan to implement an extensive waste management solution featuring a Centralised Digital Locker, which aims to ensure end-to-end traceability. This

system will include a centralised data repository, housing various waste management documents, SIM-based vehicle tracking for transparency, real-time monitoring for efficient stock management, circularity integration for promoting sustainable practices, sustainability metrics for tracking environmental impact and waste diversion rates for achieving our zero waste to landfill goals.

The digital platform aims to streamline documentation management, ensure audit compliance and maintain vendor

and transaction-related compliance documents. It will include a waste management data repository for enhanced traceability and reporting. We believe that automated vendor onboarding with PAN/GSTIN verification will lead to improved efficiency and compliance. The availability of auditable information will support audit requirements and foster transparency in the waste management process.

Water Efficiency

Championing Water Stewardship



At Nxtra, water stewardship extends beyond conservation to replenishing and safeguarding local water resources. We recognise the value of water and advocate sustainable methods for preserving, recycling and reuse. Through rigorous management, we minimise consumption and actively restore depleted sources, enhancing groundwater levels. Our initiative epitomises excellence in water stewardship, integrating advanced technologies for real-time tracking, quality monitoring and sustainable practices. We are pioneering a hydrodynamic future for maximum efficiency and environmental responsibility.



We are committed to reducing our water footprint and creating “Zero Liquid Discharge (ZLD)” data centres by incorporating sound water management practices, promoting efficiency and recycling. This commitment to water efficiency is integral to our ESG framework, vital for ensuring business continuity amid potential scarcity threats.

Flowing Forward with Visionary Water Management

Our mitigation strategies include rainwater harvesting and advanced treatment systems, bolstering our resilience to water stress scenarios and promoting portable water treatment plant.

We have collaborated with one of the leading partners in the water management space to implement advanced sewage treatment plants and rainwater harvesting systems to enable real-time monitoring of water usage and quality. This will also enable real time tracking and monitoring of Water Usage Effectiveness (WUE) and other water quality parameters.

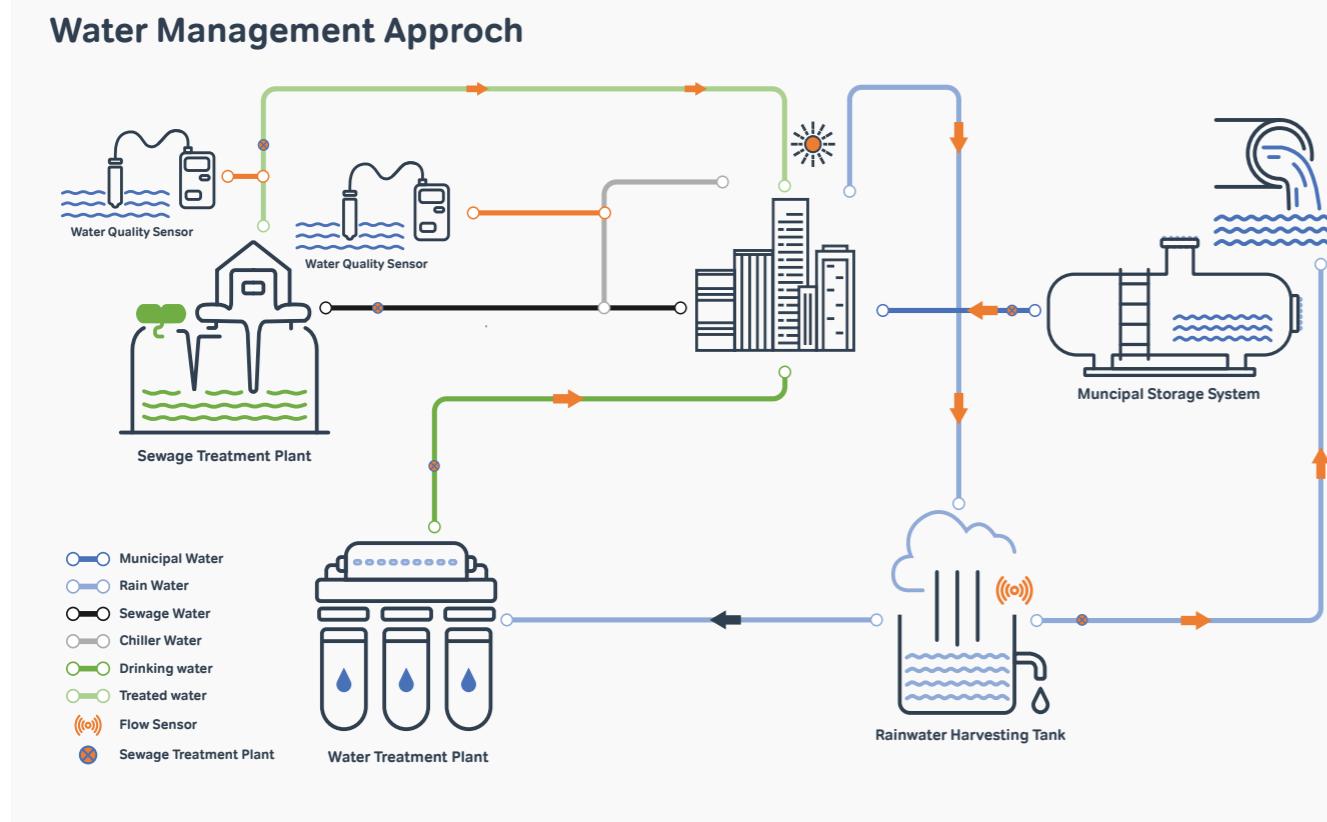
All of our facilities have water-efficient faucets. We have also introduced

sensor based water taps across most of our facilities, reducing water wastage and leakage. We are tracking WUE across all our core data centers as a water efficiency performance indicator. We are also designing new data centres with a zero-discharge approach to ensure efficient water management. We are also conducting rigorous water stress analysis during the site selection process for our new hyper scale campuses, ensuring effective water management.

Proper management of water usage not only delivers significant cost savings in water and power consumption but also mitigates downtime risks and enhances the overall sustainability of our data centers.

Our goal is to achieve **100% wastewater recycling** at all our data centres and strive to become **Water Neutral** at most of our hyperscale campuses.

Upgraded treatment plants and nano filtration systems enhance water quality, aligning with our objective of achieving water neutrality. These efforts demonstrate our proactive approach to responsible water management, essential for meeting stakeholder expectations and safeguarding local ecosystems.



Steps Taken to Manage Our Water Footprint

01



Implemented Zero Liquid Discharge in the majority of our large facilities.

02



Utilised air-based chillers and precision air conditioning units for optimal, efficient cooling within data centres with less water intake.

03



Recycled cooling tower blowdown to achieve environmentally balanced cooling and improve water use efficiency.

04



Repurposed treated wastewater for gardening and sanitation purposes.

05



Established rainwater harvesting (RWH) systems and deployed low-water-efficient plumbing fixtures.

06



Deployed sensor-based water taps in most of our circle offices to minimise wastage and leakage.

Water Stress: Scenario Analysis and Mitigation Strategies

Water stress analysis serves as a critical tool for identifying the balance between the demand for water and its availability. At Nxtra, we conduct rigorous water stress analysis as part of our site selection process for new data centres to effectively balance water demand and supply.



1. Conduct a water stress analysis for site selection
2. Implement waterproofing for ground-floor equipment
3. Ensure proper earthing and lightning protection
4. Conduct regular maintenance checks and tightening
5. Maintain an adequate DG fuel inventory for disaster readiness
6. Elevate plinths in flood-prone areas
7. Install rainwater harvesting and ZLD systems
8. Conduct IR thermography audits for equipment maintenance
9. Ensure proper rack installation and cooling redundancy

Innovative Water Treatment and Management POC Undertaken at Pune Data Centre.

The innovative water treatment and management proof of concept (POC) implemented at the Nxtra Data Centre in Pune exemplifies corporate sustainability and technological advancement. In collaboration with a reputable water management company, this initiative aims to revolutionise water management practices within the data center industry. By addressing challenges related to real-time water quality monitoring, sewage treatment and rainwater harvesting, we are setting new benchmarks for environmental stewardship.

Green Building and Materials

Promoting Green Infrastructure



At Nxtra, sustainability has been a cornerstone of our mission since our establishment. We emphasise sustainability by embedding green principles into every stage of planning. Our infrastructure development integrates green practices and we retrofit existing data centers to stay true to our commitment to environmental stewardship. Beyond compliance, our goal is to create an ecosystem that balances performance, efficiency and environmental impact.

Future-proofing Foundations with Green Buildings

Sustainable design is crucial in enhancing energy efficiency, reducing energy consumption, leading to significant cost savings and a reduced carbon footprint. The use of eco-friendly materials in construction minimises waste and helps preserve natural resources, contributing to resource conservation. Green buildings also provide enhanced resilience and adaptability, ensuring long-term viability.

'Building' a Greener Future

In our pursuit of sustainability, we encourage green building practices across all our data centers, setting new industry standards.

Our key initiatives include

01 Concrete Innovation



By incorporating fly ash into our concrete mix, we have reduced cement consumption by up to 25%, simultaneously harnessing this byproduct of coal combustion to lower our carbon footprint.



Our strong commitment to sustainability drives us to adopt environmentally responsible practices across all our data centres, with the goal that 100% of our upcoming data centre buildings achieve at least LEED or IGBC Gold certification.

02 Water Conservation



Traditional curing methods require significant water usage for columns, beams, slabs and retaining walls. We have adopted an alternate curing compound to conserve water during construction.

03 Eco-friendly Materials



Instead of relying on clay or cement bricks, we use autoclave-aerated blocks for both external and internal partition walls. These blocks, manufactured using fly ash, provide an effective alternative to conventional building materials.

04 Recycling of Steel in Construction



For TMT steel, wastage is controlled and any scrap generated is sent to a recycling vendor. This material is used in columns, beams, slabs, retaining walls and other allied RCC structures.

05 Sustainable Power



Solar lights have been installed in our offices providing a sustainable source of power, particularly at the site office.

Biodiversity

Nxtra is dedicated to integrating environmental consciousness into every facet of its infrastructure projects, ensuring a forward-thinking approach that prioritises sustainability. By incorporating precautionary measures into our operations that impact mitigation, ecological restoration and habitat protection, Nxtra is promoting biodiversity that not only protects the environment but also enhances its own resilience and longevity. Recognising the vital link between a thriving ecosystem and operational excellence, Nxtra commits to preserving the biodiversity surrounding its projects. Biodiversity principles are seamlessly incorporated into the construction and management of its data centers.

With a firm commitment to biodiversity conservation and sustainable practices, Nxtra ensures its data centers are strategically located, avoiding protected regions and complying with all relevant government regulations. Nxtra also enhances biodiversity through greenbelt development initiatives, utilising plant species recommended by environmental authorities to mitigate air pollution and enrich the biodiversity status of its data centers.

As Nxtra moves forward, it remains steadfast in its environmental stewardship, striving for responsible infrastructure development that harmonises with nature and advances the well-being of ecosystems and businesses alike.



Plantation Drives at our Data Centres



Social

Empowering People and Communities

Material Issues

Human Capital Management	Diversity, Equity and Inclusion
Employee Health and Well-being	Community Engagement

Stakeholder



Investors



Regulators



Customers



Suppliers and Partners



Human Capital Management

From Potential to Performance



We recognise that engaged employees are the driving force behind our success, not only in terms of productivity but also as fervent brand ambassadors who drive innovation and contribute significantly to our Company's overall growth. At Nxtra, we prioritise creating a work environment that nurtures a deep sense of belonging, purpose and promotes holistic development for our employees. Our aim is to cultivate a culture where every team member feels valued, motivated and inspired to contribute their best. We strive to cultivate a culture where every team member feels valued and motivated to contribute their best. This includes providing opportunities for professional development, recognising and celebrating individual and team achievements and promoting open communication and collaboration.



“We recognise that a diverse workforce is our greatest asset. By fostering an inclusive environment, we unlock the full potential of every team member, paving the way for groundbreaking solutions.”

Heena Naithani
Head - HR, Airtel
Business and CE



Cultivating a Vibrant Workplace Culture

At our core, we understand that a vibrant and inclusive workplace culture is paramount for enhancing employee satisfaction and engagement. We bring our team together through a series of celebrations and events that create a strong sense of community and build team camaraderie.

Recognising individual achievements is a cornerstone of our culture. Celebrating promotions acknowledges the hard work and dedication of our employees serves as a source of motivation for others to strive for excellence.

Moreover, our commitment to holistic well-being extends to our employees' families as well. Through dedicated celebrations, we promote a healthy work-life balance, reinforcing employee loyalty and overall well-being.



Open Channels for Communication and Feedback

At our organisation, we maintain a culture centered on collaboration and transparency, where regular Focus Group Discussions (FGDs) provide our employees with a platform to freely express their opinions and suggestions, enabling us to proactively address the needs of our workforce. By fostering an environment of open communication and employee engagement, we strive to empower our team and drive innovation. Our accessible HR Connect sessions encourage informal conversations between HR representatives and employees, promoting transparency and approachability.

Additionally, Townhall Meetings serve as pivotal forums. These gatherings provide updates, facilitate discussions and include Q&A sessions to ensure that everyone is well-informed and engaged in our Company's progress. To further enhance our feedback process, we utilise the AI-based

employee engagement tool that allows employees to conveniently share their thoughts, and concerns at regular intervals.

Elevating Employee Engagement

The Employee Engagement Score serves as a critical measure of our success, providing valuable insights into how connected and valued our employees feel. This score reflects the effectiveness of our efforts to gather and act on feedback, underscoring the importance of aligning with our future vision and prioritising the well-being of our workforce.

A high Employee Engagement Score is not just a metric, it is an imperative that highlights our commitment to creating a supportive and thriving workplace. By focusing on employee well-being, we

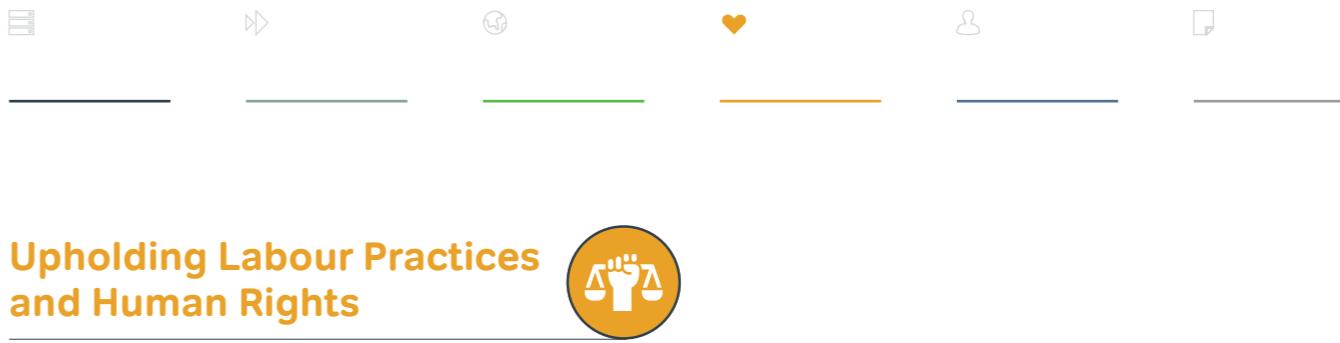
foster an environment where individuals feel valued and motivated, which in turn drives organisational success.

In addition to our focus on collaboration and transparency, we also utilise AI-based employee engagement tool to reinforce employee engagement, rewards and recognition. These platforms empower our employees to contribute meaningfully to our shared success, fostering a culture where individual efforts are celebrated and team accomplishments are recognised.



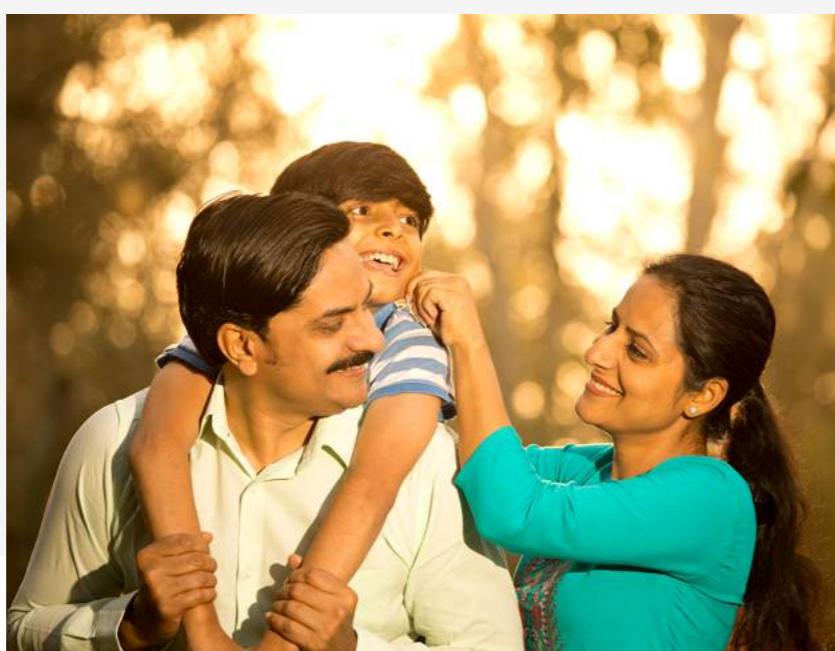
86.4

Employee engagement score



Parental Benefits

Nxtra's childcare policy provides a comprehensive set of benefits to new parents. This includes a monthly allowance, assurance of retaining the same or similar role upon return, special childcare leave of up to 1.5 years and provisions for primary and secondary caregiver leaves. These measures empower our employees to thrive both personally and professionally. Additionally, our flexible work options further enhance work-life balance, ensuring that employees can effectively manage their responsibilities at home while excelling in their roles at work.



Engaging and Nurturing Talent Culture

By fostering an environment of open communication and actively seeking employee feedback, we demonstrate our steadfast commitment to enhancing employee experience and ensuring talent retention.

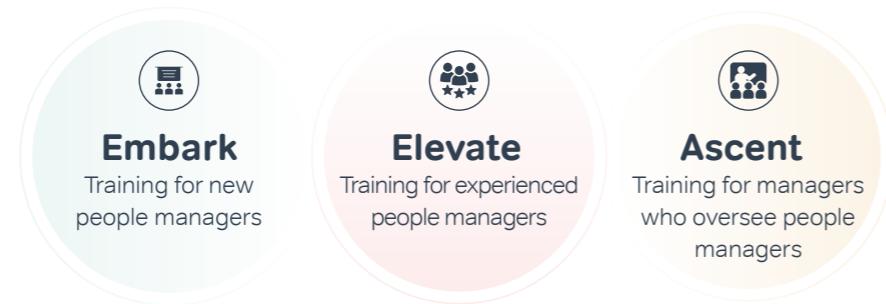
Throughout FY 2023-24, our commitment to talent retention and professional development was evident. We invested significantly in various leadership and learning programmes, offering employees unparalleled opportunities for career growth. These initiatives involved intensive training sessions held at prestigious management institutes nationwide, led by seasoned industry experts and professors.

At Nxtra, we firmly believe that our people are our greatest asset. To ensure we are nurturing a high-performing and engaged workforce, we place a strong emphasis on developing exceptional people management capabilities. Recognising the pivotal role that effective leadership plays in driving organisational success, we have implemented a comprehensive suite of training programmes designed to equip our managers and leaders with the necessary skills to excel. Our programmes, Embark, Ascent and Elevate, cater to the diverse needs of our employees at different stages of their managerial journey. From first-time managers to seasoned leaders, these initiatives provide a structured pathway

for honing people management skills. As our organisation grows and evolves, we understand the importance of continuous learning and development. By investing in our people managers, we empower them to build high-performing teams, foster employee growth and ultimately contribute to Nxtra's overall success. Also, we assist our employees in managing the end-of-employment process. Through these programmes, we aim to cultivate a culture of excellence where leaders inspire, motivate and empower their teams to achieve extraordinary results.

Overall Attrition rate

FY23	16.3%
FY24	14%



Upholding Labour Practices and Human Rights



Nxtra upholds human rights, adheres to global best practices and labour laws and fully complies with the International Labour Organisation (ILO)'s fundamental principles. Our commitment to ethical standards is evident in our respect for the United Nations Universal Declaration of

Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. This commitment is further reinforced by our dedication to promoting mandatory training programmes for all employees, including specialised training for our

security personnel. Through these initiatives, we ensure that our workforce is equipped with the knowledge and skills necessary to uphold these principles and maintain the highest standards of ethical conduct in their professional activities.



Our commitment to sustainability and responsible business practices is further reinforced through our active participation in the United Nations Global Compact (UNG). This year, we reaffirmed our dedication by signing the UNGC, aligning our subsidiary with the group's principles on human rights, labor, the environment and anti-corruption. By aligning ourselves with these international frameworks, Nxtra ensures that our business operations consistently prioritise the well-being and rights of all individuals, contributing to a fair and sustainable global economy.



WE SUPPORT

100%

completion rate of training on Human Rights issues



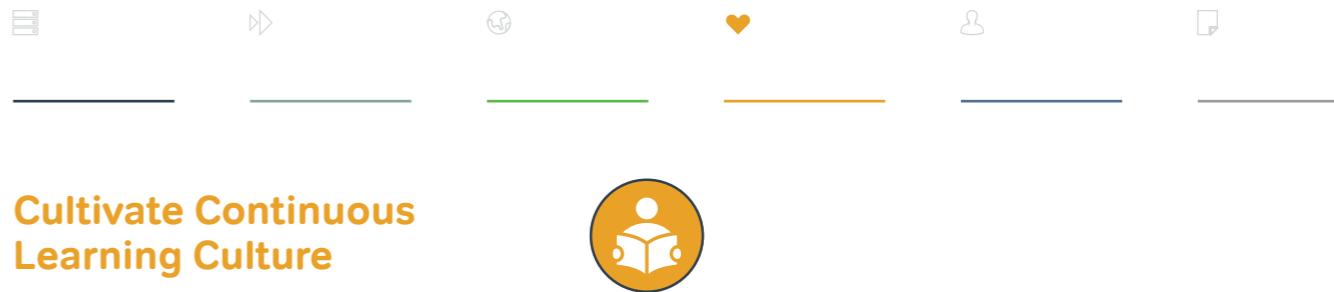
Zero

grievances filed related to Sexual Harassment, Discrimination at Workplace, Child Labour, Forced Labour /Involuntary Labour, Wages and other Human Rights related issues



Zero

tolerance to discrimination cases reported based on Gender, Ethnicity, Religion, Nationality, Social Origin, Political Opinion, Disability and Race



Empowering Labour with Integrity

Ensuring labour compliance is paramount at Nxtra. We adopt a comprehensive approach aligned with key labour laws such as the Minimum Wages Act, the Shops and Establishments Act, and the Contract Labour (Regulation and Abolition) Act. Our strategy includes policy development, rigorous training, meticulous record-keeping, regular audits and a robust grievance redressal mechanism. These are all designed to ensure fair wages and safe working conditions, preventing forced or child labour and empowering employees to voice their concerns.

At Nxtra, we conduct regular compensation reviews to ensure competitive pay and transparent salary structures while offering performance-based incentives. In adherence to the Factories Act, we maintain reasonable working hours to help our employees maintain their work-life balance. Additionally, we provide essential benefits such as paid leave, health insurance and social security, thereby boosting employee morale and improving productivity.



Leading with Human Rights

Respecting human rights is a fundamental duty and a cornerstone of our business practices. We are committed to preventing actions that might undermine individual dignity or result in discrimination based on sex, sexual orientation, age, nationality, race, ethnicity, ideology, belief, religion, social status, family origin, disease or disability. We engage with our stakeholders regularly to understand and manage our impact on human rights.

We are uncompromising in our commitment to creating a workplace free from human rights violations. We uphold an environment of equal opportunity, diligently addressing pay parity across genders and taking a firm stand against any form of bias based on race, age, colour or other factors. By adhering to these principles, we cultivate a culture of inclusion, fairness and respect for all individuals.

Our commitment to human rights initiatives is reinforced through comprehensive training and

awareness programmes. We implement compulsory training programmes across all organisational tiers, covering human rights principles, policies and procedures for every employee. Additionally, specialised training is provided to our security personnel. By arming our workforce with the requisite knowledge and competencies to uphold human rights standards in their daily activities, we foster a deep understanding and unwavering dedication to these values across our Company.



Cultivate Continuous Learning Culture



At the heart of our organisation lies a steadfast commitment to cultivating a high-performing, diverse workforce that aids in achieving our strategic objectives. This unwavering dedication manifests through our continuous investment in the training and development of our employees, ensuring they are equipped with the knowledge and skills necessary to navigate the evolving business landscape and deliver exceptional results for our clients. To support the career aspirations of our employees, we have developed a diverse range of learning tools that provide them with a broad spectrum of workplace skills and specialised knowledge tailored to their specific career paths. This comprehensive approach enables our employees to grow professionally, stay updated on industry trends and excel in their roles.



Leadership Training Modules

01 Emerging Leaders Programme

For first-time managers/junior management

03 Advanced Leaders Programme

For functional / vertical heads

02 Future Leaders Programme

For mid-level management personnel

04 Executive Leadership Programme

For senior/top management roles including CEO

Nxtra focuses on learning and development, viewing it as crucial for boosting productivity, fostering innovation and minimising employee turnover. We provide a wide array of opportunities for employees to continually enhance their skills and knowledge, instilling a culture of ongoing learning and skill refinement that drives both individual professional growth and organisational success. Our comprehensive programmes offer ample opportunities for employees to strengthen their skills, promoting continuous learning and professional development, which enriches our workforce and enhances the overall success of our organisation.



nxtLearn

Comprehensive Capability Development Programme

Recognising the need for a systematic approach to identify specific skill gaps and training needs across departments and functions, we have introduced nxtLearn. This platform addresses diverse learning needs, providing tailored training content to bridge skill gaps effectively and support the professional development of the employees.

Moving forward, a decentralised approach will be adopted to address the diverse learning needs of different departments more efficiently. Sharper Training Needs Identification (TNI) will be achieved by conducting Focus Group Discussions (FGDs) with role holders and validating inputs with leaders across all departments to pinpoint specific learning needs. Additionally, a learning repository will be developed, comprising function-specific training programmes for ongoing capability development. This content will be uploaded to iLearn, making it accessible anytime a new team member joins the function.



Airtel Learning Academies

Employees also have the opportunity to enhance their leadership capabilities through the flagship "Airtel Learning Academies," an immersive, leadership development programme aimed at nurturing future leaders.

Our courses are designed with varying durations, allowing employees to engage in self-paced learning, tailored to their individual needs.

iLearn

Through platforms like 'iLearn,' employees have seamless access to training materials, facilitating the culture of continuous learning and skill development.

Organised into four categories based on hierarchy, our training modules offer an extensive learning menu, ensuring specifically customised courses for each employee.

Annual Compliance Education

We are dedicated to upholding high ethical standards by mandating annual Code of Conduct (COC) training for all employees. All employees are required to complete the training and sign a declaration affirming their compliance.

We reinforce this commitment with regular updates on ESG-related policies via internal communications and maintain comprehensive records of training completion to ensure accountability and transparency.



Performance and Growth Reviews

We remain steadfast in our commitment to a Performance Management System (PMS) that nurtures growth and success for both our Company and its employees. Our 360° approach guarantees a fair and comprehensive evaluation, empowering individuals to realise their full potential and make significant contributions to our Company's objectives.

Our PMS presents a plethora of benefits for our employees.

01

Ensures a fair and transparent evaluation process through our multi-source feedback system, mitigating bias and guaranteeing a thorough assessment of performance.

03

Recognises and rewards strong performance through promotions and competitive compensation packages.

02

Provides valuable development opportunities by offering feedback that aids in self-improvement and career advancement.

04

Fosters an environment of open communication with managers, promoting transparency and encouraging dialogue within the organisation.

Diversity, Equity and Inclusion

Promoting a Diverse Environment



At Nxtra, we are dedicated to embracing the diversity and autonomy of each employee, from different walks of life, fostering a culture that celebrates individuality and encourages personal growth and advancement. We firmly believe that Diversity, Equity and Inclusion (DEI) are not only essential for innovation and progress but also fundamental to our Company's success.

We embrace people from all walks of life, valuing differences in background, age, gender, sexuality, family status, disability, race, nationality, ethnicity and religion. These differences are not only respected but cherished, as they enable us to better understand our markets, generate innovative ideas and drive societal impact.

Fair treatment and recognition of individual differences are integral to our ethos, allowing everyone to contribute meaningfully. With a diverse workforce and an inclusive culture, we are poised to meet the varied needs of our customers and sustain our Company's growth trajectory.

Our commitment to equity and diversity is further highlighted by proactive measures, including robust governance mechanisms, initiatives supporting women in non-traditional careers and ambitious targets. By prioritising equity, we endeavour to cultivate an environment where every individual feels valued, respected and has equal opportunities for advancement and success.

Building a Culture of Accountability

Led by our group's diversity initiatives like Game Changers and Airtel Business (AB) Launchpad, we promote inclusivity and support women in unconventional career paths. Leadership compensation is tied to the achievement of DE&I objectives demonstrating Nxtra's dedication to fostering an inclusive workplace.

Emphasising a harassment-free workplace, we enforce a stringent

30%

increase in female employees as compared to FY 2022-23

Code of Conduct (CoC) and establish internal complaints committees for employees to address concerns. Prioritising women's safety, we adhere to group-level Women Safety Policy guidelines, offering provisions for late working hours and travel safety. A dedicated ombudsperson committee reinforces our Company's commitment to employee safety and well-being.



Aim to increase gender diversity in our workforce by 2x in next three years with base year as FY 2022-23



NxtWAVE: Nurturing Women Talent in Engineering

In an industry traditionally dominated by male voices, Nxtra recognised the urgent need to diversify its talent pool. Despite strong overall engagement and retention, female representation remained notably low, limiting the organisation's access to diverse perspectives. To address this challenge, Nxtra launched NxtWAVE (Nxtra Women Advancing in Engineering), a programme aimed at cultivating a new generation of female talent from the ground up.



Key Components of the Initiatives Include

Pre Joining

01 Targeted Campus Partnerships



Strategic collaborations with local universities, attracting female talent, reducing relocation barriers and fostering local engagement.

- Pimpri Chinchwad Education Trust
- K. K. Wagh Institute of Engineering
- Dr. Akhilesh Das Gupta Institute of Technology & Management
- Babu Banarasi Das Institute Of Technology And Management

02 Holistic Candidate Assessment



Beyond technical skills, NxtWAVE prioritised adaptability and enriching our Company's culture.

20

Number of female interns hired



Internship to Full-time employment- Journey of NxtWAVE Trainees



Post-joining the Internship

01 Collaborative Learning



In-depth technical training in civil, electrical and mechanical fundamentals, data center operations and job shadowing.

02 Ongoing Assessment



Weekly evaluations to gauge understanding and application of learning modules.

As a result of these initiatives, Nxtra experienced reduced turnover costs and strengthened its competitive position in the industry. NxtWAVE not only addressed the gender gap in engineering but also proved instrumental in driving organisational growth and resilience.

Employee Health and Well-being

Nurturing Health and Safety



We firmly uphold the principle that 'Health and Safety Always Come First.' This foundational belief is deeply embedded in our Group Health and Safety Policy. We aim to cultivate a workplace that is safe, secure, comfortable and conducive to good health for all individuals involved in our business operations.

We are dedicated to establishing ourselves as the benchmark for exemplary Environment, Health and Safety (EHS) practices across all operational and construction sites. Through the rigorous implementation of health and safety protocols, we

have created a secure working environment for our employees. Our specialised EHS team has been instrumental in nurturing health and safety, promoting awareness and focusing on the well-being of our employees and workers.

ISO 45001
Occupational Health and Safety Management System (OH&SMS)*

*For all core DCs



Safety Objectives - Zero Harm



	0	No. of fatalities
	0.025	TRIR
	38,670	Training hours
	1	No. of recordable injuries
	0.13	LTIFR*

*Lost Time Injury frequency rate (LTIFR)



EHS Management System

Plan

- EHS policy
- EHS procedures
- Risk management
- Objectives and targets

Do

- Operational control procedures
- Competency development
- Emergency preparedness
- Communication

Check

- Performance monitoring
- Audits and inspections
- Compliance evaluation

Act

- Corrective actions closure
- Management review
- Continual improvement

Building Safety: The 8 Pillars of Nxtra's EHS Management Framework

Upholding the robust EHS management framework, Nxtra is steadfastly committed to safeguarding the welfare of its workforce. Through a comprehensive approach encompassing eight key pillars, our Company diligently implements various initiatives to monitor and ensure the well-being of all its employees. This proactive stance highlights Nxtra's dedication to maintaining a safe and secure workplace environment, prioritising the health and safety of every individual involved in our operations.

Planning

- Establishing goals and continuous evaluation
- Identifying hazards and assessing risks
- Determining legal and additional requirements
- Safety integration in design: Protocol and evaluation

Performance Evaluation

- Performance monitoring, measurement, analysis and evaluation
- Management oversight
- Internal auditing

Leadership and Worker Participation

- Commitment, values and vision statement
- Roles, responsibilities and accountabilities

Improvements

- Reporting incidents and non-conformities and implementing corrective actions
- Consultation and participation of workers
- Measures for continuous improvement

Operational Management and Coordination

- Establishment of preventive maintenance and inspection schedules
- Preparedness and response planning for emergencies
- Contractor management during tendering phase
- Procurement of products/services in compliance with EHS standards

Communication and Consultation

- Incident/event reporting
- Management-stakeholder interaction (safety meetings or feedback channels)

Support

- Resource allocation for the safety team and budgeting
- Competency, awareness and training

Administrative Programmes

- Implementing programmes for stress management, yoga, physical fitness activities, meditation and health assessments
- Including pre-employment health checks, first aid training and health screenings

Pillars

04



01



02



03



05



06



07



08



Safety at the Core

We instil the belief across our workforce that occupational injuries and illnesses are preventable. Safety management is of utmost importance, with unwavering commitment from leadership to all stakeholders. Adherence to EHS protocols ensures operational continuity without compromising safety standards. We actively promote practices to safeguard our well-being and cultivate a culture of mutual awareness.

Driven by our vision of 'Zero Injury', we strictly prioritise worker welfare. Our integrated EHS Manual and General Conditions of Contract provides comprehensive guidelines to address the health and welfare concerns of our workforce. When evaluating vendors, we consider their past performance in workers welfare. Our commitment extends to providing comprehensive worker welfare facilities, both onsite and offsite.



4,355,782 Hours

Safe man hours in construction



EHS Contractor Management Process

Contractors are mandated to develop and uphold labour welfare and facility maintenance plans that align with local regulations and Nxtra standards. We meticulously review and approve EHS, logistics and welfare plans, alongside regular audits to ensure compliance. Worker feedback is actively sought during safety committee meetings and leadership conducts site inspections to assess the effectiveness of welfare measures. Nxtra consistently explores avenues to extend welfare initiatives to worker colonies, further reinforcing our commitment to safeguarding the well-being of our workforce.

Pre-qualification

- Shortlisting contractors
- Contractor compliance with EHS prequalification questionnaire
- Submission of supporting documentation by contractors

Selection

- Evaluate and assess contractor's EHS pre-qualification questionnaire responses
- Verify and validate supporting documentation for EHS compliance
- Evaluate contractor's previous performance, if any

Contracting

- Contractor onboarding induction
-Introduction to the Nxtra EHS framework
- Review of contractor EHS plan, procedures and adherence to EHS legal requirements
- Orientation and implementation

Task Commencement

- Contract acknowledgment of EHS guidelines
- Training, induction and tool box training for all workforce before commencement of work
- Inspection and checks at various task levels
- Enforcement of prohibition notices and penalties for EHS non-compliance
- Reward and recognition to promote culture of continual improvement



Strengthening Safety Awareness

Nxtra is dedicated to promoting a work environment that emphasises employee well-being and safety through a comprehensive approach.

01

Prioritising Health and Safety



Nxtra integrates robust Environmental, Health, and Safety (EHS) practices to ensure a safe and conducive workplace for its employees. The organisation demonstrates its steadfast commitment to employee health and safety through proactive measures to mitigate risks and address potential hazards.

02

Comprehensive Wellness Programmes



Our EHS team meticulously plans monthly health and wellness programmes aligned with the NSC, international EHS bodies and WHO's health event calendar. These initiatives effectively raise awareness among employees about various health-related topics and encourage the adoption of a healthier lifestyle.

03

Nurturing Physical and Mental Well-being



Monthly stress management sessions, including yoga, meditation and stretching exercises, are held that promote both physical and mental wellness among the workforce. Recognising the importance of maintaining a healthy work-life balance, Nxtra provides employees with tools and resources to manage stress effectively.

04

Extensive Safety Training and Induction



Nxtra offers comprehensive safety training and induction programmes for employees and workers to equip them with the necessary skills and awareness to mitigate risks efficiently. Training needs for each individual identified at the beginning of the year is held. The senior leadership monitors capacity building at Nxtra to ensure that the training needs are complied as per the training plan.

05

Proactive Safety Measures



The organisation actively participates in events like Road Safety Week and National Fire Safety Week, World Environment Day, international Yoga Day, demonstrating its commitment to employee safety. Nxtra also implements measures to protect employees from heat-related risks, prioritising their well-being across various work environments. By integrating these initiatives, Nxtra establishes itself as an employer of choice, fostering a culture of care and support for its employees.



We have implemented a strategic initiative known as the 'Topic of the Month' (ToM), a proactive programme that involves monthly sessions designed to heighten awareness on specific safety topics and provide comprehensive training to partners. Each year, an annual calendar is introduced outlining the ToM themes for every month. Later, detailed write-ups on each ToM topic are distributed company-wide to enhance employee knowledge. Additionally, Nxtra communicates its EHS journey through a dedicated EHS Newsletter issued quarterly, updating stakeholders on EHS goals, performance, initiatives and progress.

Topic-focused Training Conducted

Operations

FY24		2,051
FY23		1,419

EHS Training - Man Hours

Operations

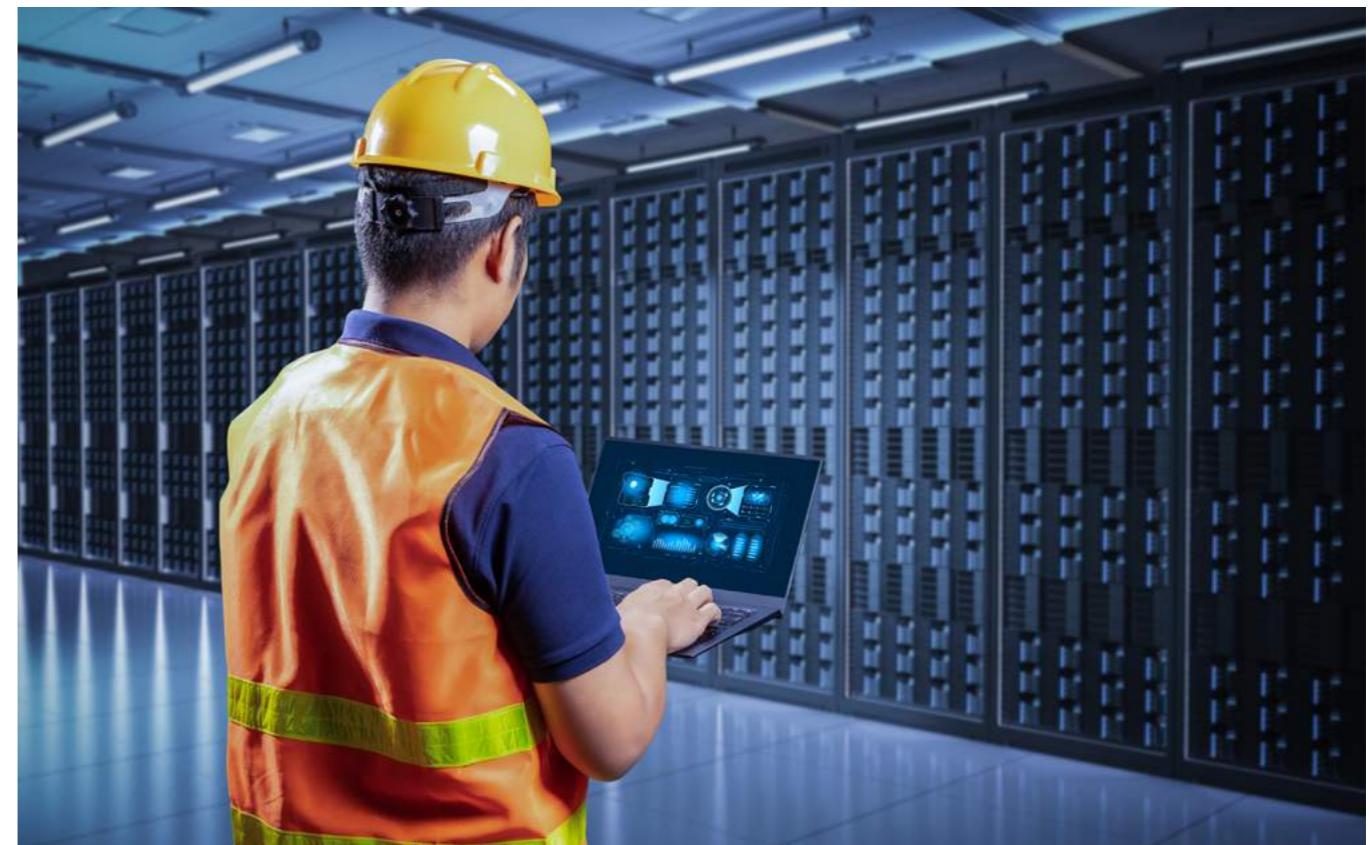
FY24		12,884
FY23		8,766

Projects

FY24		1,811
FY23		966

Projects

FY24		25,787
FY23		12,822



Emergency Drills and Exercises

Operations



Projects



Navigating Safety: Health and Safety Leadership Tour

At Nxtra, Health and Safety Leadership Tours involve an interactive process aimed at assessing the safety and environmental practices within the organisation. During these tours, the management actively samples and observes various activities to ensure their safety and risk factor for the personnel or the environment. Additionally, the management engages with the workforce, providing or attending briefings, conducting talks or EHS meetings to address any concerns raised during the tours.

These leadership tours are essential components of Nxtra's commitment to safety and are conducted by a team comprising the COO, HOD and relevant stakeholders. As part of the protocol, Project Managers and Managers, along with their direct reports from all entities, undertake an EHS Leadership Tour at least once per quarter. This proactive approach reinforces Nxtra's dedication to safety and fosters a culture of accountability and continuous improvement across the organisation.

Safety Recognitions Awarded

Operations



Projects



Enhancing Safety Culture in Construction Projects

Ensuring safety and fostering a positive mindset among workers in construction projects can present significant challenges due to various factors. To promote safety and enhance the well-being of all workers, we have implemented three initiatives throughout the year.



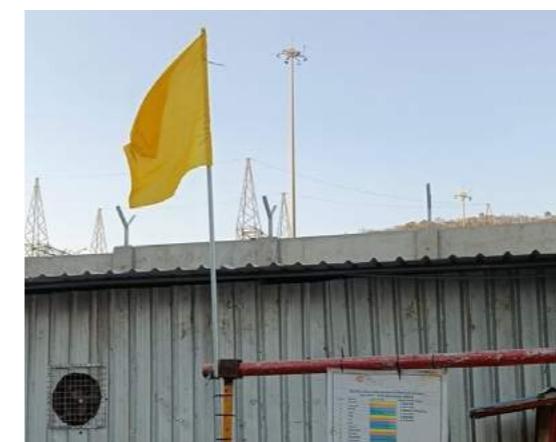
Green Card Programme

Recognising the importance of motivating workers to prioritise safety, we introduced the Green Card programme at the Kolkata Project site. This initiative rewards workers for demonstrating safe behaviour on the ground, encouraging positive safety practices.



Rolling Trophy Initiative

To address the challenge of enforcing safety practices among multiple contractor teams, we implemented the Rolling Trophy initiative at one of our project sites. This involves monthly evaluations of contractor teams' EHS performance and the best-performing team is awarded the rolling trophy. The initiative aims to promote teamwork and improve safety standards across the project site.



Monthly Colour Code Flag System

To streamline equipment inspection tagging and enhance safety awareness among workers, we introduced the Monthly Colour Code Flag system. Each month, a designated colour flag is displayed at the site. This colour inspection tag indicates the inspection status of tools and equipment for that particular month, ensuring standardised safety practices and facilitating easy identification of inspected equipment.

Celebrating Excellence in Safety

We uphold a culture of safety by acknowledging, recognising and rewarding the workforce for their dedicated commitment to safety. We conduct monthly Safety Champion recognition programmes, during which the management felicitates exemplary safety performer. Our Rewards Programme integrates safety as a key performance indicator influencing employee appraisals and bonuses. Additionally, we employ internal tools like "Kudos" for spontaneous appreciation, ensuring that safety efforts are consistently recognised and celebrated throughout the organisation.



Upholding Standards: EHS Assurance and Governance

Nxtra maintains the highest standards of Environmental, Health, and Safety (EHS) assurance and governance through rigorous adherence to regulatory requirements. This commitment includes meeting customer expectations and complying with ISO Management System Requirements, ensuring legal compliance and preserving a strong reputation.



Three-level Audit Assurance System

To ensure steadfast assurance, Nxtra has implemented a robust three-level Audit Assurance System. This comprehensive framework comprises:



External Audits



External third-party audit of EHS Management System



Cross-site and Internal Audits



Regular cross-site and internal audits guarantee that all sites and operations uphold the highest EHS standards



Management Review Meetings



These forums promote open communication, collaboration and continuous improvement among stakeholders, addressing EHS concerns promptly and effectively



Community Engagement

Creating Value for Society



Nxtra places great importance on social contribution activities, recognising their essential role in the sustainable development of both the society and the business. By actively engaging in community initiatives, we aim to create a positive impact that extends beyond our corporate boundaries. Our commitment to community engagement reflects our dedication to fostering social well-being, all of which are integral to our long-term success.



₹56.08 million
CSR expenditure during FY 2023-24



30%
increase in CSR expenditure



Education



Hunger,
Poverty and
Malnutrition

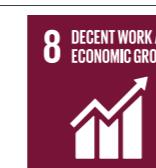
Focus Areas



Gender Equality



Livelihood Enhancement



Corporate Social Responsibility (CSR) Governance

We abide by a meticulously crafted CSR policy, endorsed by our CSR Committee and Board of Directors. In compliance with the Companies Act, 2013, our Company has established a dedicated CSR Committee comprising three Non-Executive Directors. This Committee oversees and guides Nxtra's CSR initiatives, ensuring they align with our objectives and deliver meaningful impact.

Composition of the CSR Committee

Vani Venkatesh

Non-Executive Director Chairperson –
CSR Committee

Harjeet Singh Kohli

Non-Executive Director
Member – CSR Committee

Kapil Modi

Non-Executive Director
Member – CSR Committee

Bharti Airtel Foundation

Founded in 2000, the Bharti Airtel Foundation was established with a profound commitment to make a significant impact in the field of education. The Foundation's primary objective is to drive transformative change, improving the living conditions of children and youth in rural India through education. Since its inception, the Foundation has been actively engaged in designing and implementing educational programmes across primary, secondary and higher education levels.



Vision

To help the underprivileged children and young people of our country to realise their potential



Mission

Committed to creating and supporting programmes that brings about sustainable changes through education and use of technology

Driven by a deep-seated necessity and resolve, the foundation not only aims to provide education to underprivileged children but also create opportunities for their holistic development. The Bharti Airtel Foundation consistently strives to realise its vision, mission and goals by collaborating with various stakeholders, including government entities, the corporate sector and rural communities.



Empowering Rural Education: The Satya Bharti School Programme

In FY 2023-24, Nxtra partnered with Bharti Airtel Foundation in their Satya Bharti School Programme



5



232



6072

Making a Difference: Bharti Group's ACT Programme

The ACT-A Caring Touch programme encourages Bharti Group employees to contribute to social causes through volunteering and payroll giving. Employees can support the Bharti Airtel Foundation and registered NGOs to promote education for underprivileged students. Volunteering offers personal, academic and professional growth for students, enriching their lives and preparing them for future challenges. Employees are encouraged to participate in activities with Satya Bharti School and other government schools, choosing from over 30+ volunteering options that align with their expertise and passions.



This programme promotes education for underprivileged students in rural areas. Established in 2006, this flagship programme of Bharti Airtel Foundation is grounded in the belief that education is essential for empowering children, particularly in rural India. The programme provides free quality education through well-trained teachers from nearby communities, fostering life skills and confidence for holistic development. The key pillars of the programme include:



Child-Friendly and Technology-Enabled Infrastructure



Creating a safe, clean and green school environment with technological enhancements and digital content.



Teacher and School Leadership Development



Building teacher and head teacher capacity through workshops, training sessions and mentoring programmes, ensuring effective teaching and self-directed learning.



Holistic Development of Students



Engaging students in co-curricular activities such as art, sports, language weeks, excursions, and external competitions alongside regular academics.



Parent and Community Engagement



Strengthening school-community connections through home visits, parent-teacher meetings and community development campaigns.

Satya Bharti School Programme

Highlights of the Programme

Mid-day Meal Programme

The Satya Bharti Schools' Mid-day Meal Programme underscores the commitment to holistic education by providing nutritious meals to students.

Technology Initiatives

Satya Bharti Schools are equipped with new technology-driven tools, including digital classrooms (DCR), language labs, robotic labs, tablet labs and interactive panels. Facilitate conceptual understanding through visual aids, while language labs significantly enhance language proficiency, particularly in English.

Parent-teacher Engagement

Engagement between parents and teachers is a cornerstone of the educational experience at Satya Bharti Schools. Regular interactions, discussions and participation in school activities create a supportive and communicative environment, fostering the holistic development of each child. This collaboration ensures that students receive consistent support both at home and in school.

Saksharta Bharti Abhiyan

The Bharti Airtel Foundation's Saksharta Bharti Abhiyan is a student-led community initiative designed to educate their parents, grandparents and family members who have never attended school. Through this campaign, students identify and promote learning among non-literate parents, grandparents and relatives, thereby improving their basic reading, writing and numeracy skills.

Community Volunteering

Community volunteering at Satya Bharti Schools foster a sense of shared responsibility and strengthens the bond between the school and the local community. These collaborative efforts create a more inclusive and enriching educational experience, as community members actively contribute to the school's success and students gain a deeper appreciation for their community.

Teacher Training

The teacher training programme at Satya Bharti Schools ensure educators stay updated with new teaching methods, skill development techniques and strategies for mapping student learning and academic performance. This programme aligns teaching methodologies with the educational philosophy of the Bharti Airtel Foundation.





Governance

Fortifying Sustainable Growth with Effective Governance

Material Issues

Corporate Governance and Business Ethics	Regulatory Compliance
Systematic Risk and Crisis Management	Sustainable Supply Chain Management
Data Security and Privacy	Customer Experience

Stakeholder



Investors



Regulators



Customers



Suppliers and Partners



Corporate Governance and Business Ethics

Aligning Corporate Practices with ESG Ambitions



We have developed a comprehensive ESG governance framework, supported by a diverse and dedicated leadership team, committed to upholding the highest standards of excellence. Our governance structure involves key stakeholders, including the Board and the ESG Council, ensuring effective communication and diligent oversight of our sustainability initiatives. We believe that strong corporate governance is the bedrock of financial integrity, partner and stakeholder confidence and sustainable performance. By promoting ethical leadership and business practices, we strive for excellence in all our endeavours to achieve exceptional results.



“As we navigate the complexities of the digital age, our commitment to data security and privacy reflects our dedication to ethical governance. We believe that responsible data stewardship is the key to a sustainable future.”

Shaikh Zamiruddin
Head - Operations
and CISO

Empowering Change through ESG

We recognise that a strong foundation in corporate governance principles is essential for maintaining our commitment to the ESG agenda. Nxtra's ESG governance structure, comprising cross-functional teams (CFTs), a dedicated ESG function and an ESG Council, reinforces this commitment. The ESG Council provides strategic guidance and oversight, driving our progress towards achieving ESG targets and following the best practices.

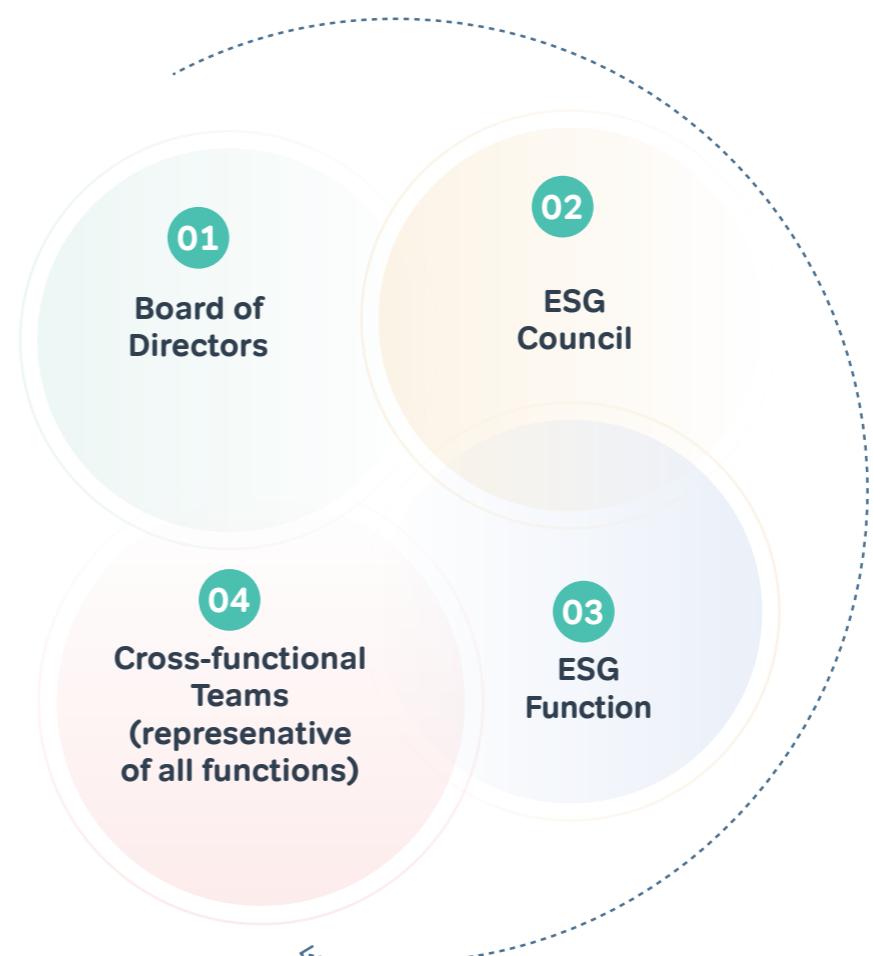


This robust framework enables us to effectively address climate change challenges through sustainable business practices.

01

Board of Directors

The Board of Directors at Nxtra plays a pivotal role in formulating and achieving long-term business objectives. The Directors provide strategic guidance and oversight on strategy, performance and governance, setting high standards that align with sustainability and shareholder value. Under the leadership of the Chairman, the Board cultivates a robust governance culture to ensure that our Company's initiatives consistently align with its growth objectives.



02

ESG Council

The ESG Council, chaired by the CEO and supported by the COO, is central to our commitment to Environmental, Social and Governance initiatives. This council reviews and recommends ESG strategies, oversees the Sustainability Report and aligns ESG goals with our Company's overall business strategy. It ensures effective governance and communication between stakeholders, driving awareness and progress in ESG initiatives.



03

ESG Function

The ESG function at Nxtra is crucial for advancing sustainability initiatives and overseeing the preparation and publication of sustainability and climate risk reports for external stakeholders.

Key responsibilities include:

01

Collaborating with departments to conduct scenario analysis.



02

Identifying risks and opportunities supported by site-level teams.



03

Developing an ESG roadmap with KPI targets and proposed initiatives in partnership with the ESG Council.



04

Monitoring ESG performance, collecting data across functions, and reporting progress to the ESG Council.



The ESG function also works closely with site-level teams to identify and eliminate climate-related risks and opportunities ensuring management agreement on mitigation plans and compliance with national and internal ESG disclosure frameworks.

04

Cross-functional Teams (CFTs)

Cross-functional teams (CFTs) at Nxtra consist of representatives from key departments such as Environmental Health and Safety (EHS), Human Resources (HR), Finance, Operations, Corporate Secretarial, Project Management and Data Security. These teams serve as Single Points of Contact (SPOCs) for each assigned material issue, focusing on implementing ESG initiatives aligned with the Company's overarching strategy, including addressing climate-related risks and opportunities at the facility level.

Their roles and responsibilities involve:

Driving the execution and monitoring of ESG initiatives specific to their assigned material issue.

Implementing control and mitigation measures to manage climate-related risks effectively, ensuring proactive management and minimising potential impacts.

Collecting ESG-related data, including climate change metrics and reporting their findings to the sustainability team.

This data plays a crucial role in evaluating the effectiveness of implemented initiatives and tracking progress of ESG goals.

Board Structure and Composition

At Nxtra, our Board ensures the achievement of long-term business objectives, oversees strategy execution and protects the interests of all stakeholders. Our transparent Board nomination process promotes the inclusion of diverse perspectives. Composed of eminent individuals, our well-diversified Board members bring a rich repertoire of talent, experience and expertise to governance, enhancing our ability to navigate complex challenges and drive sustainable growth.

Structured Leadership Roles for Effective Governance

We maintain distinct roles and responsibilities for the Non-Executive Chairman and the Whole-time Director and CEO to ensure an effective governance structure. The Chairman primarily focuses on overarching strategy development, fostering alliances, nurturing leadership capabilities, exploring international opportunities and ensuring robust corporate governance, including the efficient functioning of the Board. In contrast, the Whole-time Director and CEO is responsible for executing business strategies and overseeing the Company's financial and operational performance.

75%

Non-Executive Directors
(including one Independent Director)

Non-Executive
Board
Chairman

Zero

Whistleblower
complaints received
during FY 2023-24

Area of Expertise

- Strategic leadership and management experience
- Governance
- Industry and sector experience
- Financial and risk management
- Human capital management
- Sustainability and ESG
- Global business/international expertise

Board Committees^

Audit Committee	CSR Committee
Oversees financial reporting process, internal financial controls and review financials and related party transactions and so forth.	Engaged in evaluation, monitoring and recommending the CSR proposals and policy to the Board, among others.



Harjeet Singh Kohli
Chairman,
Non-Executive Director



Ashish Arora
Whole-time Director
and CEO



Rajesh Tapadia
Whole-time Director
and COO



Gary Wojtaszek
Independent Director



Neeraj Bharadwaj
Non-Executive Director



Kapil Modi
Non-Executive Director



Vani Venkatesh*
Non-Executive Director



**Ganapathi S.
Lakshminarayanan#**
Non-Executive Director

*Appointed as Chairperson of the Nomination and Remuneration Committee w.e.f. August 21, 2023

^The status for Committee memberships is as on March 31, 2024

Brief profile of Board members comprising their qualification, experience, domain knowledge and experience etc. is available on the website of the Company at <https://www.nxtra.in/about-us>

Leadership in Action – ESG Board Initiatives

Board leadership at Nxtra plays a pivotal role in driving ESG (Environmental, Social, and Governance) initiatives. Comprising seasoned professionals with diverse expertise, the Board provides strategic oversight and guidance ensuring that ESG considerations are seamlessly integrated into our Company's overall strategy. They actively review and support the implementation of sustainability practices, monitor progress on ESG targets and align these efforts with long-term business objectives. By fostering a culture of accountability and sustainability, the Board reinforces our commitment to responsible corporate citizenship and the creation of long-term stakeholder value.

The Board's key responsibilities regarding ESG encompass



ESG Learning Initiative (ELI) : Empowering sustainable growth through Knowledge

We launched our ESG Learning Initiatives (ELI) in February 2024, offering specialised training programmes and seminars focused on ESG principles to drive sustainability in our operations. The first ELI session for Nxtra's senior management was conducted by partners at Envint, a consultancy based in Mumbai. This inaugural session provided a comprehensive exploration of the data center industry, highlighting key material issues such as energy, emissions, waste and water that are crucial to companies across the sector. It emphasised key performance metrics related to these material issues, enhancing our understanding of how sustainability initiatives can be effectively measured. Additionally, various frameworks for assessing companies on sustainability, ranging from investor-driven to climate-focused perspectives, were discussed in detail.



Board Evaluation

Nxtra has engaged a prominent independent consulting firm to conduct the Board evaluation using an advanced online tool. The Nomination and Remuneration Committee has established a structured framework that includes the process, format, criteria and questionnaires for assessing the Board, its Committees and individual Directors—comprising the Chairman, Whole-time Director and CEO and Independent Directors. This framework adheres to best practices and aligns with the Board priorities. The evaluation process occurs annually. Directors

complete comprehensive evaluations throughout the year, covering the entire Board, Board Committees, and individual Directors, including the Chairman and the Whole-time Director and CEO. The consulting firm compiles and submits consolidated reports to the Board through the Company Secretary. Following this, the Nomination and Remuneration Committee review the evaluation results, followed by respective Committee meetings and a subsequent Board Meeting held on the same day. All Directors actively participate in this rigorous performance evaluation process.

Nomination and Remuneration Committee

We maintain a dedicated Nomination and Remuneration Committee entrusted with overseeing a robust policy framework governing remuneration for its Board members, including executive roles such as Whole-time Directors and Executive Directors, as mandated by Indian law.

The Committee ensures that remuneration levels remain competitive to attract, retain and motivate high-caliber directors and employees, crucial for the Company's sustained success. Factors considered in determining remuneration include financial health, industry benchmarks, qualifications, experience and past performance of appointees, ensuring a fair and objective decision-making process that balances the interests of both the Company and its shareholders.

Furthermore, the Committee evaluates remuneration (consisting of fixed, variable and LTI components as per policy) in line with Group's approach. This approach supports our Company's strategic objectives and sustainability commitments, ensuring that compensation is intricately linked to ESG targets as well as diversity

and inclusion (D&I) initiatives, thereby fostering an inclusive workplace environment.

Additionally, we have a well-defined and structured Long Term Incentive ('LTI') framework, effective as of March 31, 2024, aimed at attracting and retaining talent while aligning long-term interests with organisational goals. The Nomination and Remuneration Committee oversees and monitors the administration of ESOP schemes, underscoring our commitment to sustainable growth and enhancing shareholder value.

Audit Committee

Audit Committee plays a pivotal role in overseeing the financial reporting process, internal financial controls and reviewing financial statements and related party transactions. We ensure rigorous scrutiny to uphold transparency and accuracy in our financial disclosures.

In addition to our core responsibilities, the Audit Committee actively engages in discussions on Environmental, Social, and Governance (ESG) issues.

These discussions encompass internal audit processes and the framework for managing risks associated with our operations. By integrating ESG considerations into our audit and risk management practices, we aim to enhance our sustainability efforts and align them with our objectives.

Transparency in Remuneration Disclosure

Executive remuneration details are presented for shareholder's approval, based on Board recommendations. This includes separate disclosures for each component wherever applicable salary, short-term incentives, long-term incentives, pensions, perquisites, benefits, and one-off payments such as recruitment or retention awards.

Regulatory Compliance

Ensuring Compliance and Excellence



We have instituted policies and procedures that adhere to globally recognised business standards and benchmarks, ensuring consistent adherence to legal and ethical principles throughout our organisation. These governance policies are regularly updated to align with evolving laws, regulations and stakeholder's expectations, underscoring our commitment to transparent and ethical operations.

Code of Conduct

We have embraced the group-wide Code of Conduct (CoC), aligned with Bharti Airtel's standards, to uphold ethical standards and responsible practices throughout its operations. This CoC integrates global best practices and meets ESG requirements, encompassing a comprehensive framework. It encompasses guidelines for expected

conduct, fostering a harassment-free workplace, promoting fairness and preventing conflicts of interest. Additionally, it provides clear directives for interactions with former employees, handling gifts, engaging with government entities and other critical aspects of ethical business conduct.

Nxtra emphasises ethical relationships with customers and partners, along with effective media communication. The CoC also includes robust anti-corruption and bribery policies applicable to all employees, Board of Directors, subsidiaries and business associates (including suppliers, contractors, and service providers). Our Company maintains a zero-tolerance stance towards bribery and corruption, reinforced by our whistleblower policy enabling stakeholders to report violations of the Code.

Nxtra's Code of Conduct for Business Associates

Nxtra's Code of Conduct for business associates upholds rigorous standards of business ethics across financial, professional, market and behavioral realms. Adherence to this Code is mandatory, with strict consequences for any breaches.

The Code of Conduct for business associates provides detailed guidelines on various ESG (Environmental, Social, and Governance) considerations. It includes commitments to uphold Human Rights, ensure Occupational Health and Safety and safeguard data privacy. We also prohibit practices such as forced, bonded, indentured or involuntary labor, aligning closely with international labor laws, ILO conventions and Modern Slavery legislation. These standards are applicable not only to employees but also business associates.



Conflict of Interest

Managing conflict of interest is paramount at Nxtra; we ensure policies and procedures are in place to mitigate risks and promote transparency. By addressing potential conflicts proactively, we uphold integrity and foster trust among our workforce, shareholders and business partners. Regular training and awareness programmes reinforce these policies, ensuring a culture of accountability and ethical conduct throughout the organisation.



Compliance Management

We manage all regulatory, environmental and operational compliances using the Compliance Monitoring System (CMS), a workflow-based online risk assessment tool. CMS allows us to assign, track and record compliance activities, breaking down team barriers to meet our compliance goals. It also provides a Compliance Score to monitor our progress and prioritise audit controls, reducing our risk exposure. The tool serves as a

secure repository for uploading and managing evidence and other artifacts.

The CMS also supports transparent communication with stakeholders and integrates seamlessly with our overall business processes, enhancing efficiency and managing evidence and other artifacts.



Certifications

Design Objectives	Environmental Objectives
• TIA 942	• ISO 14001 • ISO 50001
• Uptime	• ISO 45001
Services Objectives	Business continuity Objectives
• ISO 20001	• ISO 22301
• ISO 9001	• MEITY empanelled CSP provider
Security Objectives	
• ISO 27001	• PCI DSS
• SOC 1 & SOC 2 TYPE II	• ISAE-3402 TYPE II

Systematic Risk and Crisis Management

Crisis-ready: Systematic Risk Management



Our robust risk management framework addresses strategic, legal, financial, operational and environmental risks comprehensively. Central to our ESG strategy and business continuity efforts is the proactive evaluation of potential disruptors to our operations. We rigorously identify critical risks across the organisation and implement actionable mitigation plans, ensuring a resilient and secure business environment.

Integrated Risk and Emergency Management Approach

We employ an integrated risk and emergency management approach through a streamlined three-step process: risk identification, risk mitigation and monitoring and reporting. This systematic framework ensures proactive management of potential risks and effective response strategies in crisis.



01

Risk Identification

We undertake a comprehensive process of identifying strategic risks at the enterprise level. This includes evaluating various risk criteria that could potentially impact the organisation's business and operational continuity, supply chain operations, market reputation as well as its future growth and technological advancements. Regular documentation ensures that all identified risks and their associated sub-risks are well-documented, with clear responsibility assigned to designated risk owners for effective management and mitigation.

02

Risk Mitigation

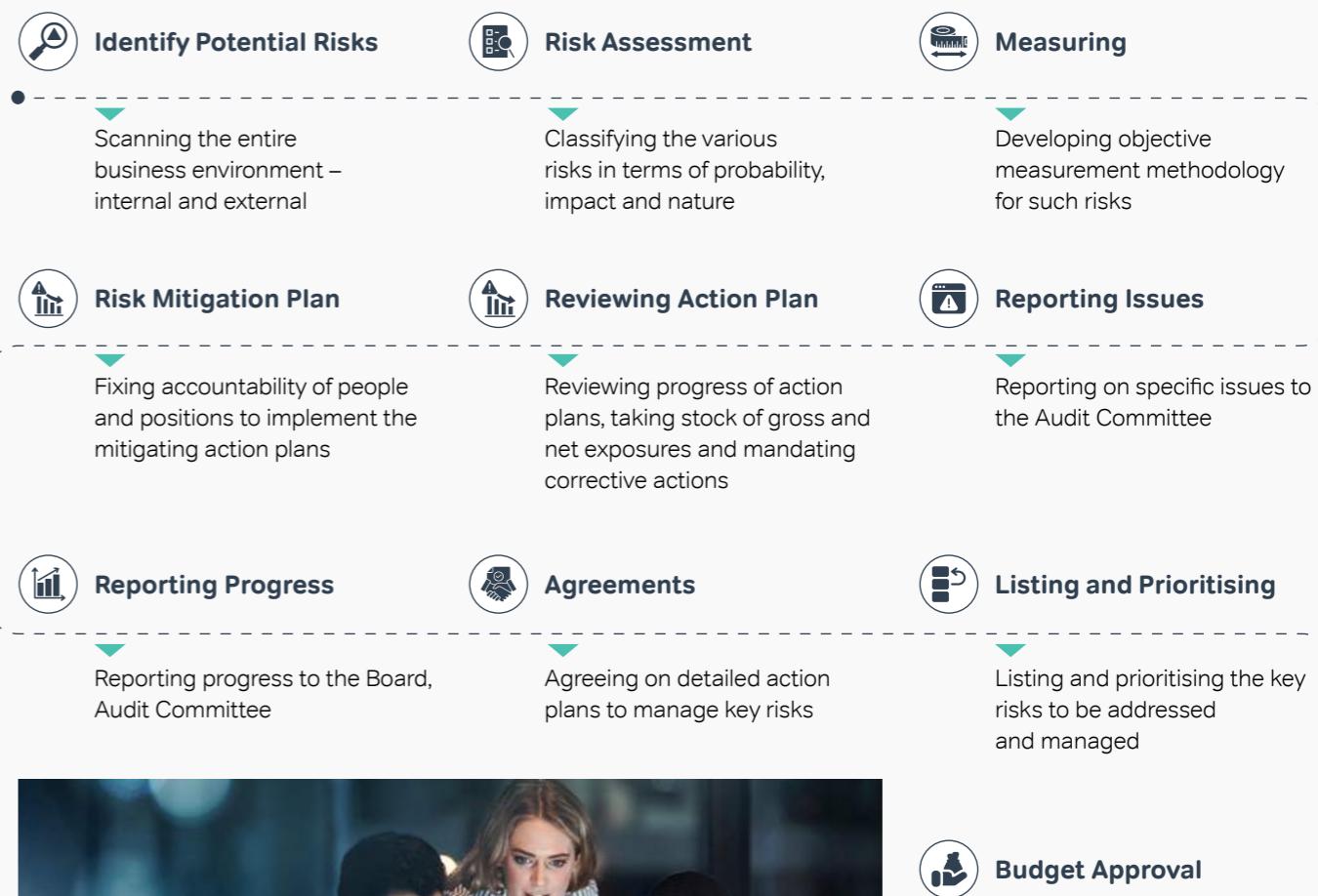
We proactively develop and implement strategies to minimise the impact or likelihood of identified risks for the organisation. This process includes formulating specific actions aimed at eliminating or reducing exposure to potential risks and mitigating their adverse effects. Mitigation plans are tailored to the identified risks to enhance resilience and ensure business continuity. Implementing effective risk mitigation strategies is essential for maintaining stability and operational efficiency in constantly evolving environments.

03

Risk Monitoring and Reporting

We systematically observe and assess identified risks throughout their lifecycle, from initial identification through mitigation and beyond. Bi-annual monitoring is conducted for recognised key strategic risks, where the effectiveness of action plans is evaluated and both gross and net exposure to the risk are assessed. Subsequently, corrective measures are implemented based on these assessments. Progress updates and specific issue reports are then presented to the Management. This ongoing process ensures that risks are continuously monitored to track changes, evaluate mitigation effectiveness and promptly identify emerging risks.

Risk Identification Process



Meeting Environmental Challenges Head-on

Addressing environmental, social and governance (ESG) risks requires a proactive and strategic approach to mitigate potential impacts on business operations and stakeholder relationships. At Nxtra, we prioritise understanding and managing these challenges through a structured framework that identifies key environmental risks. By integrating sustainable practices and adhering to global standards, we aim to navigate these challenges responsibly while contributing positively to the environment and communities we operate in.



Primary Risks and Mitigation Approaches

Risk	Impact	Mitigation
Environment		
Expansion of our business operations has resulted in increased carbon emissions.	Challenges in achieving emission reduction targets. Potential impact on long-term credibility and sustainability of business operations	We are actively pursuing renewable energy sources, utilising open access procurement and implementing low-emission technologies to reduce our carbon footprint
Environment		
Extreme climate conditions, including recurrent severe weather events such as flooding, seismic activity, cyclones and heat waves	<ul style="list-style-type: none"> Degradation of infrastructure Interruption of supply chains Disruption of repair and maintenance operations Damage to infrastructure Safety hazards for personnel 	<p>The infrastructure team holds regular meetings and follow-ups to implement the action plan addressing identified risks, including retrofits to withstand changing climate conditions</p> <p>Enhancing data centre resilience by incorporating structures designed to tolerate higher temperatures, providing greater redundancy</p> <p>Building collaborative capabilities among a broad range of stakeholders to enhance collective action</p>
Social		
Geopolitical factors, including communal conflicts, labor strikes, political upheavals, civil unrest, pandemics and other social disturbances.	<ul style="list-style-type: none"> Could lead to increased volatility and uncertainty Potential for business disruptions 	Ongoing stakeholder engagement in operational areas and continuous assessment of the impacts of changing political and social landscapes
Governance		
Inadequacies in internal control frameworks and compliance protocols.	<ul style="list-style-type: none"> Could lead to inefficiencies and losses, impacting the Company's reputation Manpower shortages 	<p>Ensuring compliance with statutory bodies, municipal corporations and central and state government legislations, while staying updated on all relevant laws in our operational regions.</p> <p>We manage all regulatory, environmental and operational compliances using the Compliance Monitoring System (CMS) which allows us to assign, track and record compliance activities, breaking down team barriers to meet our compliance goals.</p>
Lagging behind in adopting the latest technological developments, digital transformation and innovative solutions.	<ul style="list-style-type: none"> Will affect costs, agility and operational efficiency Shifts in customer value propositions 	Prioritising digitisation for our customers, integrating digital initiatives into our business strategy to foster innovation and adaptability in response to evolving business dynamics.

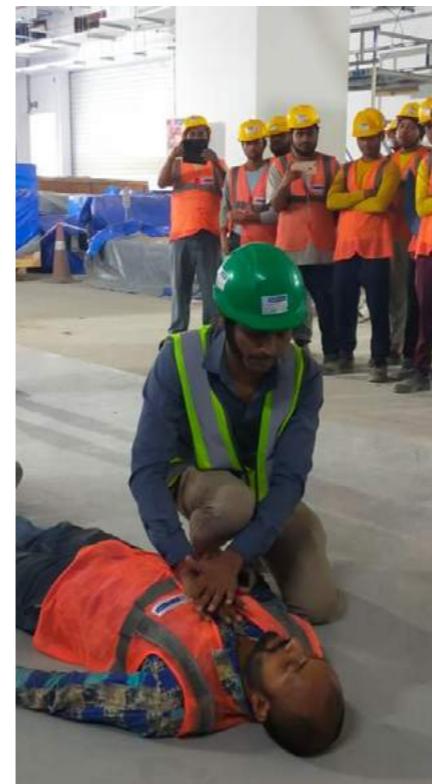
Future-proofing with Proactive Measures

Fire Evacuation Drills

Quarterly fire evacuation drills are conducted across all data centers to assess and enhance preparedness in the event of a fire emergency. These drills evaluate response times and refine evacuation procedures to ensure safety and efficiency.

Diverse Emergency Drills

Beyond fire drills, we simulate various other emergency scenarios to test and improve our response capabilities. These include handling infectious diseases like COVID-19, injury situations requiring first aid and addressing incidents such as fuel spillage. In addition to this, protocols for containment, quarantine, and area-specific safety measures are rigorously assessed during these drills.



Business Continuity Planning (BCP)

Our BCP plans incorporate preventive measures such as thermographic scans of outdoor equipment to monitor temperature variations, particularly in critical components like diesel generator (DG) units. Regular maintenance, including coolant replacement, ensures optimal performance of support utilities within data centre environments.

Flood Management Strategies

Data centres are strategically designed above ground level, with elevated plinths and floors, exemplified by facilities like Mumbai DC and Chennai DC2. This architectural approach mitigates flood risks, particularly in low-lying areas, with data halls often situated on the first floor to further minimise susceptibility to water damage.

Supplier Agreements and Compliance Protocols

Our BCP strategies extend to supplier agreements and compliance protocols. Regular transformer checks and maintenance are conducted every six months to ensure operational reliability. Furthermore, we have designated processes in place for the safe disposal of lubricating oil, a by-product of transformer maintenance, in compliance with environmental regulations.

These proactive measures collectively enhance our resilience, ensuring that our Company can effectively manage and mitigate various risks, maintain business continuity and uphold safety and environmental standards.



Sustainable Supply Chain Management

Promoting Responsible Sourcing



We are dedicated to advancing Environmental, Social and Governance (ESG) standards among our suppliers, ensuring adherence to ethical business practices and Human Rights principles. This proactive approach highlights our commitment to transparency and positive impact across our operations and supply chain, setting a benchmark for responsible corporate conduct.

Through collaborative efforts with suppliers and partners, we enhance sustainability within our data center supply chain. We conduct rigorous audits and assessments to verify compliance with stringent environmental and social criteria. Our strategic sourcing practices reinforce our commitment to integrating sustainability objectives into our supply chain strategy, aligned closely with the broader goals of the Airtel Group.

Key Focus Areas of Supply Chain Strategy

- Supreme quality
- Competitive cost
- Strong focus on innovation
- Risk mitigation and agility to evolve
- Short lead time



99%
India-based suppliers

30+
Suppliers attended ESG Awareness Sessions

100%
of strategic suppliers have acknowledged and accepted the Company's Human Rights Policy

100%
of suppliers have signed the Code of Conduct

Supplier ESG Assessment

In collaboration with the Bharti Airtel Group, we have successfully concluded our inaugural Supplier Sustainability assessment of strategic suppliers. The suppliers were selected based on criteria such as **job severity, emissions in the last fiscal year and average billing** over the past two years. This initiative underscores our commitment to establishing a sustainable supply chain that not only aligns with our business objectives but also enhances customer service and strengthens our competitive market position.

Our sustainable supply chain strategy is built upon a robust framework that governs our relationship with suppliers through structured business process. This framework involves thorough supplier screening, rigorous selection criteria and engagement practices that ensure high standards are maintained. In addition to evaluating quality, price competitiveness and responsiveness, all partners must adhere to Airtel's ESG policies.

Spectrum of Topics covered in the Survey

- Human Rights, Labor Rights and Anti-modern Slavery
- Work Condition, Health and Safety
- Environment and Energy Management
- Data Privacy
- Corporate Governance and Supplier Code of Conduct



Supplier ESG Awareness Sessions

Collaborating with Suppliers for Sustainable Impact

We prioritise developing robust, enduring partnerships with our suppliers, rooted in mutual trust and a collective commitment to sustainability. We organised multiple annual ESG training workshops for our suppliers to deepen our collaboration on sustainability initiatives. These workshops served as a platform to share best practices and foster environmental and social responsibility across our supply chain. By working closely with our suppliers, we aim to strengthen our sustainability efforts and create a positive impact that extends beyond our operations.

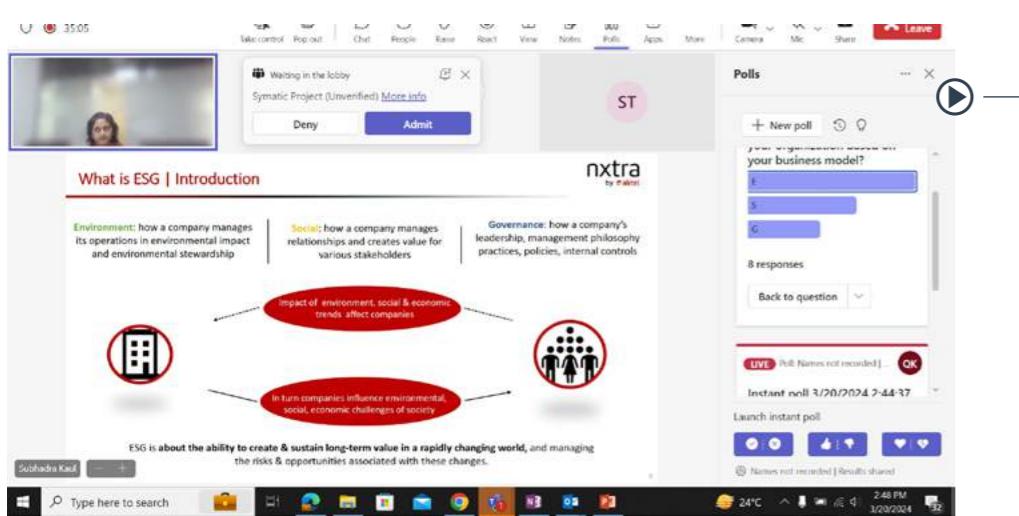
Topics covered:

- Code of Conduct and Human Rights.
- Encouragement to obtain certifications such as SA 8000, ISO 14001, OHSAS 18001, ISO 27001, or similar standards.
- Adoption of environmentally friendly practices, including energy-efficient products, renewable energy integration and adherence to SBTi targets for carbon reduction where feasible.
- Effective management of ESG risks and mitigation plans.

Our workshop emphasised aligning supplier practices with our sustainability goals, specifically targeting carbon footprint reduction. By providing tools and knowledge, we empower partners to implement and report on essential ESG initiatives.



Snapshots of sessions conducted



Ensuring Health and Safety Compliance in Contractor Evaluation

At Nxtra, we prioritise Health and Safety (H&S) compliance throughout our contractor evaluation process. This stringent assessment ensures that all contractors adhere to the highest standards of workplace safety and regulatory requirements, thereby safeguarding the well-being of personnel and the environment.

Comprehensive Evaluation Process

Our evaluation process commences with the release of specific task requirements to potential contractors or suppliers, outlining essential criteria for project participation.

H&S Evaluation and Feedback

Shortlisted contractors or suppliers undergo further evaluation by our H&S team. If submissions do not meet compliance standards, we provide constructive feedback or request additional information to ensure rigorous adherence before advancing to the pre-task commencement phase.

Contractor Participation and Document Submission

Contractors or suppliers review the task requirements and indicate their intent to participate by submitting their tender documents within the specified timeframe. We verify each contractor's pre-qualification and ensure compliance with tender requirements.

Ensuring a Safe and Sustainable Work Environment

Thorough evaluation process allows us to select the most suitable contractors or suppliers ensuring exceptional quality and sustainability. Our commitment to H&S compliance underscores our dedication to fostering a safe and sustainable work environment for all stakeholders.

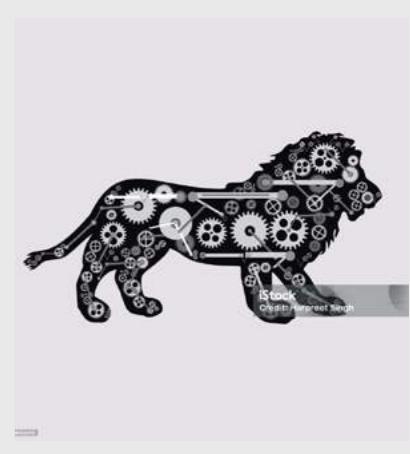


Supporting Local Suppliers

Supporting local procurement is a cornerstone of Nxtra's strategy for community engagement and sustainable economic growth. By prioritising local suppliers and partners, we strengthen regional economies and enhance operational efficiency and responsiveness. This commitment extends beyond economic benefits, encompassing social responsibility and environmental stewardship, in alignment with our Company's broader goals.

We have actively developed a robust ecosystem of indigenous suppliers to build a sustainable supply chain network. This strategic initiative ensures timely and optimal supplies through innovative and streamlined processes. By doing so, we not only contribute to local economic vitality but also demonstrate our commitment to forging enduring partnerships within the communities we serve.

Nxtra is committed to supporting local businesses, with a significant 99% of our centralised procurement expenditure for the fiscal year 2023-24 allocated to local suppliers in India.



Data Security and Privacy

Securing Confidentiality



At Nxtra, we prioritise the protection of sensitive data entrusted to us by our clients and stakeholders. Our approach to data center operations integrates state-of-the-art security protocols, stringent privacy policies and continuous monitoring to safeguard against unauthorised access, breaches and potential threats. By upholding industry-leading standards and regulatory compliance, we are committed to preserving confidentiality and maintaining the integrity of all data housed within our facilities.

Information Security and Privacy

In today's digital landscape, Information security and privacy are paramount. We prioritise safeguarding both data integrity and personal information within our data centers. Our approach is built on robust frameworks and stringent protocols designed to mitigate risks and protect against cyber threats and breaches. We comply with industry standards and regulatory requirements to ensure that our customers' sensitive data is handled with the utmost care and in accordance with legal mandates.

Ensuring Data Privacy: Nxtra's Core Responsibility

We uphold a strict zero-tolerance policy regarding data breaches and promptly take decisive actions to address any incidents. In the event of a breach, we implement rigorous measures, such as terminating services and potentially pursuing legal action, to maintain the highest standards of data protection.

Maintaining Third-party Compliance

We enforce stringent privacy standards across our third-party partners, holding them accountable to the same rigorous practices we uphold internally. Non-compliance can lead to disciplinary actions, including termination of agreements. External parties must establish protocols that educate their associates on personal liability regarding sensitive information and the repercussions of policy violations.



Enhanced Governance and Oversight

Our Chief Information Security Officer (CISO) rigorously oversees our governance policies to ensure meticulous compliance across all operations. To fortify our data security further, we utilise real-time monitoring systems that oversee data streams and manage instances of non-compliance through thorough investigations.

Securing Customer Trust

Through our commitment to data privacy and security, we safeguard the trust of our customers and stakeholders. This dedication highlights our pledge to protect sensitive information and uphold the highest ethical standards in the industry.



Features of Information Security and Privacy Framework



Policy

Adoption of a tailored policy, the Bharti Airtel Information Security Policy (BAISP), aligned with the Group's Security Policy



Action

Adoption of a tailored policy, the Bharti Airtel Information Security Policy (BAISP), aligned with the Group's Security Policy

- Implementation of internal controls

- Execution of strict processes and pertinent technologies to maintain the privacy of personal information throughout its lifecycle

- Utilisation of specialised software on endpoints to monitor multiple communication channels for potential breaches and trigger real-time alerts

- A centralised team is responsible for alert review, investigation initiation and necessary actions

- All incidents are meticulously tracked, resolved within specified timeframes and subject to monthly reviews, ensuring timely closures

- The majority of our core data centres are situated within Special Economic Zones (SEZs), thereby incorporating an extra layer of physical security

- Bharti Airtel's comprehensive security protocols, encompassing the telecommunications sector and an AI-driven Security Operations Center (SOC), extend their coverage to include Nxtra's data centres



Programme

Enactment of an Information Security Risk assessment and recovery strategy conforming to **ISO 27001** and **ISO 22301** standards

- Fraud Management

- Programme led by revenue assurance and fraud management experts

- Collaboration with Law Enforcement Agencies (LEA)

- Aligned with the cybersecurity directives and guidelines issued by Indian Computer Emergency Response Team, India (CERT-In)

Applies to all Nxtra employees and third parties, including suppliers, who access customer, employee, and vendor information.

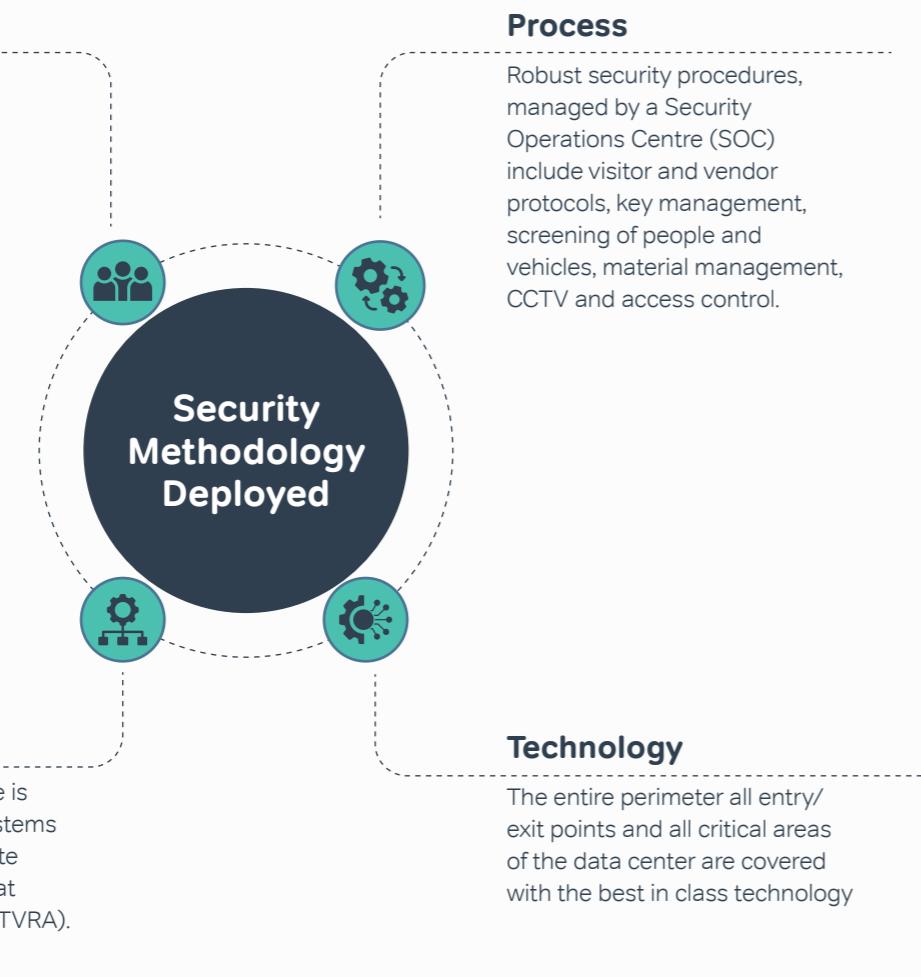
Physical Security Framework

We have established a comprehensive framework of policies, protocols and practices designed to prevent unauthorised access and manipulation of resources. Our approach to physical security is grounded in Standard Operating Procedures (SOPs) framework that is consistently applied across all data centers. Each site adheres to tailored security plans aligned with these SOPs, ensuring robust and uniform physical security measures across all locations.



People

Nxtra ensures 24/7 security coverage and regular training sessions to equip security personnel with the necessary skills to handle security situations and deliver excellent customer service.



Seven Layers of Physical Security

Levels

Layer 1	Layer 2	Layer 3	Layer 4	Layer 5	Layer 6	Layer 7
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Area

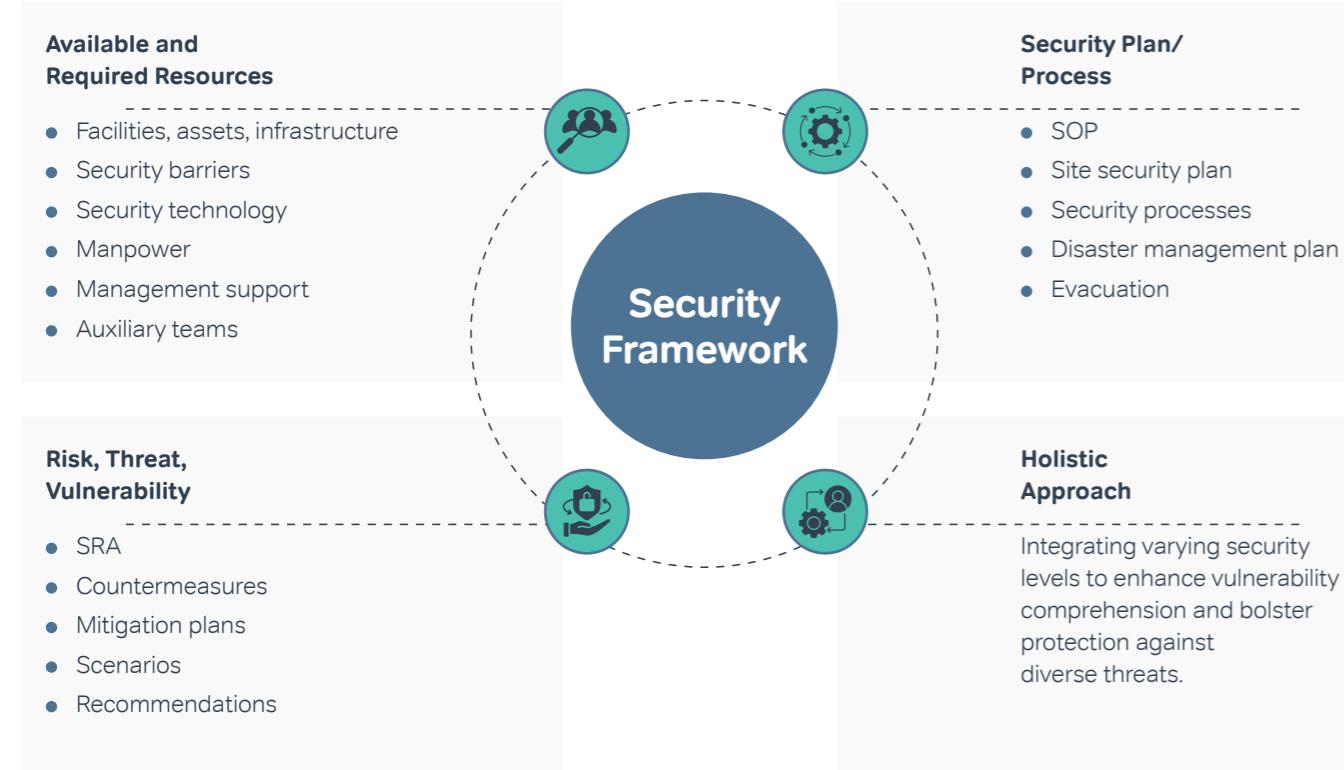
Standard perimeter wall and main gate	Security gate house	Reception/ Lobby	Data center floor entrance	Mantrap/ anti-tail gating mechanism	Data center pod/hall	Cage and rack
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Manpower/Technology Deployed

24/7 guarding + Motorised gate with anti-collision sensors + Vehicle screening through UVSS + CCTV + Boom barriers	XBIS (Baggage Scanning) + DFMD + HHMD frisking	24*7 guarding + Tripods/ Turnstiles with anti-pass back + CCTV	24*7 guarding + HHMD frisking + CCTV	2FA Biometric reader + Door interlock with anti-tail gating mantrap	2FA Biometric reader + CCTV	Customised to customer requirement
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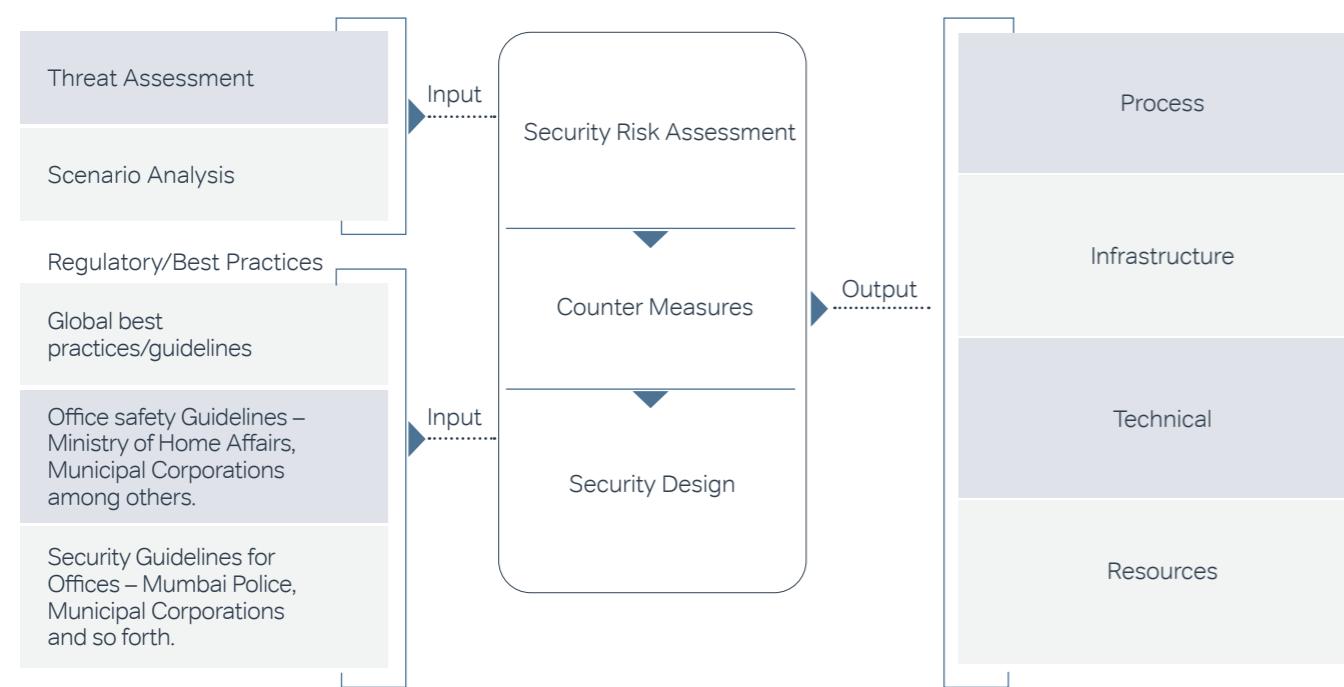
Strategically integrating security measures, from the initial risk assessment to the implementation of a holistic approach, fortifies our defence against a spectrum of threats.





Security Risk Assessment

Through a meticulous security risk assessment methodology, we identify potential threats, evaluate scenarios against regulatory and best practice standards and implement counter measures to ensure technical robustness and resource resilience



Implementing Digital Technologies for Monitoring Purposes

Our CCTV monitoring system ensures continuous, 24/7 surveillance across our data centers. To further enhance security, we are in the process of implementing integration of zoom capabilities and predictive movement analysis of individuals or objects. These advanced systems bolster our ability to prevent security breaches through analytics implemented throughout our facilities. Such surveillance strengthens our defences, ensuring robust protection against potential threats. Overall, through meticulous monitoring, stringent access controls and proactive management, we uphold our commitment to reliability and resilience in the dynamic digital landscape, underpinning operational efficiency and security within our data centers.



Security Operations Centre at one of our data centres in Chennai

Customer Experience

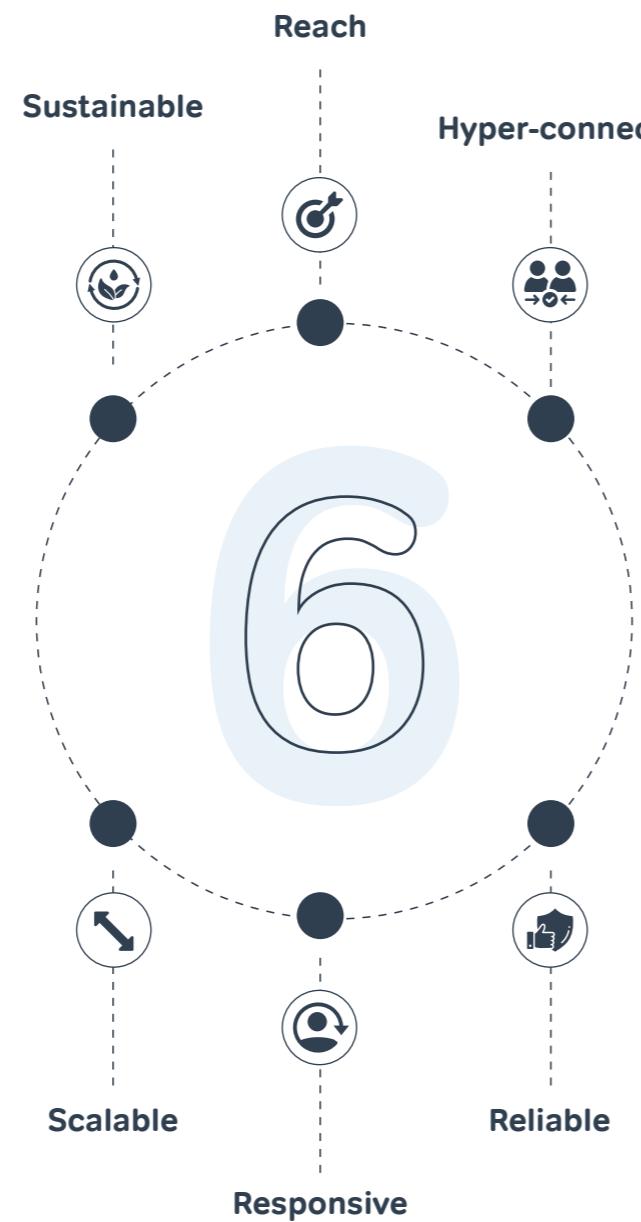
Enhancing Customer Satisfaction



Customer experience lies at the core of our mission. We are dedicated to offering unparalleled value and superior service, reflecting our legacy of excellence. Our data centre solutions are crafted to seamlessly integrate with the evolving demands of modern businesses. We have established a dedicated Customer Experience (CE) team to ensure that our services consistently meet and exceed customer expectations. The team employs a comprehensive Six-parameter approach to closely monitor service quality, identify and resolve service gaps and enhance customer satisfaction, retention , brand loyalty and revenue growth.



Elevating Customer Satisfaction: The Six-Parameter Strategy



Ensuring Seamless Service to our customers from Onboarding to Operations

We have designed a comprehensive Customer Journey Management to ensure a seamless and personalised experience for our customers from the moment of sale to ongoing service delivery. Our approach is centered on operational excellence and customer-centric practices, aimed at enhancing satisfaction and fostering long-term relationships.

Seamless Onboarding Experience

We initiate transparent and efficient onboarding processes, ensuring quick and effective engagement of customers with our services. This sets the stage for a positive and engaging customer experience.

Proactive Service Management

Our proactive service management approach enables us to anticipate and address customer needs before they even arise. We closely monitor our customers' requirements and stay attuned to their evolving needs, allowing us to proactively identify and address potential issues. By anticipating customer needs, we are able to provide them with the required support and solutions, ensuring a seamless and efficient experience.

Key Stages of Customer Journey

Streamlined Customer Onboarding

During this phase, we utilise an in-house semi-automated tool to facilitate smooth onboarding for customers. Here is how it unfolds:

- Approval by the Project Manager (PM) upon assignment to the PM Bin.
- Automatic dispatch of a Welcome Email triggered by PM approval.
- Completion of the Provision Delivery Task marked as "Done" by the PM upon successful delivery.
- Sending the Letter of Commitment (LOC) to the customer for approval following service delivery.
- Automatic initiation of the Service Handover Task upon the customer's acceptance of the LOC.

24/7 Customer Support and Service Resolution

At the customer stage, Nxtra's N-care Team, also known as Nxtra Cares, operates as the primary point of contact. Available round-the-clock, 365 days a year, this team handles customer complaints, incidents and service requests related to data center access and material movement:

- Complaints are promptly logged using a ticketing system, ensuring systematic management from initial contact through resolution and closure.
- Customers submit queries through the Airtel Thanks app for Business application, receiving acknowledgement regardless of the severity level.
- Complaints are categorised based on severity, with an established escalation matrix ensuring timely resolution within the customer experience framework.
- Dedicated Service Account Managers (SAMs) are integral to addressing and resolving service issues promptly and efficiently.

Innovating Data Centre Solutions for Our Customers

With globalisation and India's emergence as a data center hub, numerous global customers are entering the Indian market. To effectively showcase our capabilities and respond to this dynamic industry landscape, we have established a dedicated team to cater to the diverse needs of our customers.

Our team addresses both standard and non-standard requirements, particularly those involving AI-ML workloads that demand high-density power solutions. Using comprehensive intelligent simulation tools, we develop multiple solution models and scenarios to offer robust and reliable solutions. Additionally, we propose new-age cooling solutions, including liquid cooling services, which are simulated and tested to ensure reliability and instill confidence in our potential customers.

These simulation tools enable our team to predict and respond to non-standard requirements, particularly high-density power needs, making Nxtra future-ready for customers with varying server demands.

These solutions are showcased through various digital content formats for quicker and more efficient evaluation by customers, enhancing their overall experience.



Insights from Our Customers

01

The South Indian Bank Ltd



Nxtra Data has consistently provided timely and excellent support throughout our partnership. Their support during various critical phases of our DR setup has been outstanding. We look forward to a long-term association with Nxtra in the future.

02

Kronos Solutions India Private Limited



Nxtra gives very comprehensive updates and always ensures that the services are well maintained. It is great to see that they take good care of the staff as well. It's been great pleasure to have a wonderful partner like Nxtra and we look forward to strengthen our relationship.

03

May Chan

Edge cast (Global Peering Manager)



We are delighted to share our experience with Nxtra Data, which has been wonderful. We have been consistently impressed by the sustainability initiatives implemented by Nxtra Data. Partnering with Nxtra Data has not only improved our bottom line but also reduced our environmental impact. These sustainable practices have resonated with both our internal and external customers. We extend our heartfelt thanks to the entire team for their continuous support and collaboration.

Delivering Superior Customer Experience

Nxtra employs a specialised team of Service Assurance Managers who focus on cultivating and preserving customer trust while adeptly addressing their concerns. These managers conduct regular formal meetings, either virtually or in person at customer sites, to identify and resolve any issues or gaps in service delivery.

To ensure a structured customer experience, we conduct periodic satisfaction surveys and utilise the digital platform Airtel Thanks Business (ATB) for customer engagement. Through Quarterly Business Reviews (QBRs), monthly meetings and weekly calls, we actively gather feedback and promptly resolve grievances, crucial

for addressing operational issues and improving the delivery of data centre services. Additionally, we monitor CSAT through surveys to assess satisfaction levels with our products, services and interactions. Insights from these surveys inform the leadership and drive strategies aimed at continuously enhancing overall customer satisfaction.

Communicating Value Propositions



Effective marketing communication and strategic labelling are crucial components of brand identity and customer engagement. These practices not only convey the essence of our services but also resonate with our target audience, fostering trust and loyalty. By carefully crafting our messaging and employing clear, impactful labelling, we ensure that our brand story aligns with customer expectations and industry standards.

BALANCING SUSTAINABILITY & PROFITABILITY

Data centres race to go green

Usage of renewable energy can help reduce their carbon footprint

SANDEEP BUDH

THE INDIAN DATA centre industry is poised to attract investments exceeding ₹45,000 crore over the three years through 2026, as growing demand for data and storage piques the interest of a diverse set of companies. The country is now ranked as the 3rd largest data centre market globally, housing 158 data centres. According to industry estimates, India is set to witness a significant expansion in this sector, with plans to develop 45 new data centres covering an area of 13 million sq. ft. and boasting a collective capacity of 1,015 MWh by 2025-end.

Energy guzzlers

However, data centres are known for their substantial energy consumption, primarily for powering and cooling the hardware, which includes servers and net-



FEELING THE HEAT

- India's hot and humid climate makes external air cooling unviable
- Goal should be to reduce the amount of energy needed to power data centre operations
- Optimised cooling media and real-time wear usage analysis of have led to 20% cut in cooling equipment-energy consumption

Lower total cost of ownership (TCO): They enhance the productivity and efficiency of data centres, reducing operational costs.

Reduced energy costs: By adopting energy-efficient technologies, data centres significantly cut energy expenses.

However, there are obstacles to creating and maintaining sustainable data centres. Greening the power required to run data centres face challenges like competition in the renewable energy market, state-wise separate and complex regulatory policies, lengthy approval processes, and policy uncertainties. "Maintaining a renewable energy share in the energy mix of data centres while catering to the increasing power consumption demand and energy efficiency improvements remains a challenge," said Arora.

Need of the hour

Apart from the environmental benefits, embracing sustainable practices in data centres offers numerous advantages:

Improved ROI: Green data centres help improve return on investment.

Working equipment. While IT equipment is responsible for around 60% of the energy usage, cooling systems account for 20%. Infrastructure overheads contribute to 10% of energy consumption, and networking plays a more minor role. This is reaking data centre players in India embrace sustainable practices, including the adoption of renewable energy sources, energy-efficient infrastructure, and innovative cooling methods, all aimed at reducing their environmental footprint.

Some of the top new technologies for

green data centres include end-to-end green hydrogen ecosystems, fuel cell technology replacing diesel generators, efficient data centre designs and infrastructure, digital solutions to boost operational efficiency, the incorporation of renewable energy options," said Arash Arora, CEO, Nxtra by Airtel.

Creation of net-zero supply chains, server virtualisation, AI and intelligent monitoring, edge computing, IoT, hybrid cloud deployment, and ultra-efficient cooling technologies like free air, immersion cooling, water cooling, and more are also being used.

Green mission: Nxtra by Airtel has committed to achieving net-zero emissions by 2050. The company has already made significant progress, reducing its greenhouse gas emissions by 45% since 2015. "We are committed to continuing our efforts to reduce our environmental impact and contribute to a sustainable future," said Arora.

Arash Arora,
CEO,
Nxtra by
Airtel

Labelling Practices and Product Messaging

Nxtra's ESG governance framework is bolstered by Cross-Functional Teams (CFTs), ESG function and a dedicated Council guiding strategic decisions to align with ESG targets and best practices. This structure is instrumental in steering our Company's sustainability efforts, particularly in addressing climate change through sustainable business practices.

The demand for comprehensive data center product and service information arise from both internal sales teams and prospective customers eager to understand our offerings. To effectively meet these needs, we employ a range of communication tools including

website content, brochures, pitch decks, videos, case studies and mailers. Internal and external campaigns, facilitated through mailers, social media, PR stories, marketing automation tools, Google platforms, industry events and Customer Advisory Round Table (CART) events, further raise awareness about our data centre capabilities.

Stringent compliance measures ensure that all our data center-related messaging and content adhere to accuracy and guidelines. Rigorous evaluation by business stakeholders guarantees reliability and consistency in communications both internally and externally.

Ensuring Accuracy in Communications

Efficient communication is integral of our commitment to transparency and reliability. By adhering to stringent verification processes, we ensure that our customers and stakeholders receive trustworthy and factual information about our data centre services. This approach not only supports informed decision-making but also enhances trust and credibility in the market. Prior to publishing any content related to data centre services on external platforms, thorough verification is conducted by cross-functional teams including Product Support Services (PSS) and infrastructure experts.

This meticulous review ensures that information disseminated through our Company's website, social media channels, email newsletters, events, PR and media channels is accurate and align with the Company's standards. Nxtra upholds a commitment to compliance, with no instances of non-compliance recorded in its labelling practices and marketing communications.



Strategic Marketing Endeavors

Brand Visibility through Integrated Media and Digital Strategies

We have strategically bolstered our brand visibility and industry credibility through a multifaceted approach encompassing both traditional media and digital channels. Through regular features in prestigious publications such as Economic Times, Financial Express, The Times of India and Business Insider, we have significantly elevated our presence in the market. Concurrently, our Company has leveraged its robust LinkedIn strategy to establish itself as a trusted authority in the data centre industry. By sharing compelling stories on media coverage, ESG initiatives, success stories, leadership insights, product updates and employer branding content,

we have cultivated an aspirational brand image, further solidifying our position in the industry.

Moreover, we have implemented a strategic approach focused on developing targeted messaging and content tailored to specific audience segments. This strategy highlights our expertise in data center construction, operations, scalability, ESG strengths and migration capabilities. To maximise our outreach, we have executed integrated campaigns across multiple platforms, including B2B marketing automation, LinkedIn, intent-based search and the Google Display Network (GDN). These initiatives collectively contribute to enhancing our market presence and reinforcing our leadership in the data center sector.

Industry Engagement and Recognition

Our active involvement in prominent data center industry events, including W. Media, UBS Forums, Economic Times, and ASSOCHAM, underscores our position as a thought leader and key player in the industry landscape.



Internal ESG Engagement

We actively integrate ESG (Environmental, Social, and Governance) considerations into our internal communications, particularly during significant national and global events. These initiatives are designed to raise awareness on ESG principles among employees, promoting interactive discussions and encouraging participation in initiatives that yield tangible outcomes. Such internal engagement not only strengthens our Company's commitment to sustainability but also enhances employee morale which positively impacts external perceptions and marketing efforts.



Scoring a 'Zero' has worked in our favour



Tailored Data Center Exposures

We host customised data center tour events for CXOs and senior leadership across Chennai, Manesar, Pune and Mumbai. These tours showcase Nxtra's state-of-the-art facilities and advanced technologies, enhancing our market position and driving business growth through targeted marketing efforts.



GRI Content Index

GRI Standard & Disclosure sub-sections	Details	Section	Data Points	Reason for Omission 2024
GRI 2: General Disclosures 2021				
2-1	Organisational details	About the report		
2-2	Entities included in the organisation's sustainability reporting	About the report		
2-3	Reporting period, frequency and contact point	About the report		
2-4	Restatements of information	There has been no restatement of Information		
2-5	External assurance	Assurance statement		
2-6	Activities, value chain and other business relationships	About Nxtra		
2-7	Employees	Total employees as of 31 March 2024: 204		
2-8	Workers who are not employees			Information to support the disclosure requirement is not completely available. However, the Company will incorporate relevant Information in future sustainability reports.
2-9	Governance structure and composition	Empowering change through ESG		
2-10	Nomination and selection of the highest governance body	Board Structure and Composition		
2-11	Chair of the highest governance body	Structured Leadership Roles for Effective Governance		
2-12	Role of the highest governance body in overseeing the management of impacts	Leadership in Action-ESG Board Initiatives		
2-13	Delegation of responsibility for managing impacts	Leadership in Action-ESG Board Initiatives		
2-14	Role of the highest governance body in sustainability reporting	Board Structure and Composition		
2-15	Conflicts of interest	Ensuring Compliance and Excellence		
2-16	Communication of critical concerns	Structured Leadership Roles for Effective Governance		
2-17	Collective knowledge of the highest governance body	ESG Learning Initiative		
2-18	Evaluation of the performance of the highest governance body	Board Evaluation		

GRI Standard & Disclosure sub-sections	Details	Section	Data Points	Reason for Omission 2024
2-19	Remuneration policies	Nomination and Remuneration Committee		
2-20	Process to determine remuneration	Nomination and Remuneration Committee		
2-21	Annual total compensation ratio			Information to support the disclosure requirement is not completely available. However, the Company will incorporate relevant Information in future sustainability reports.
2-22	Statement on sustainable development strategy			Information to support the disclosure requirement is not completely available. However, the Company will incorporate relevant Information in future sustainability reports.
2-23	Policy commitments	Ensuring Compliance and Excellence		
2-24	Embedding policy commitments	Ensuring Compliance and Excellence		
2-25	Processes to remediate negative impacts	Stakeholder Engagement		
2-26	Mechanisms for seeking advice and raising concerns	Stakeholder Engagement		
2-27	Compliance with laws and regulations	Ensuring Compliance and Excellence		
2-28	Membership associations			Associated Chambers of Commerce of India (ASSOCHAM) and GSM Association (GSMA) International.
2-29	Approach to stakeholder engagement	Stakeholder Engagement		

GRI Standard & Disclosure sub-sections	Details	Section	Data Points	Reason for Omission 2024
2-30	Collective bargaining agreements		The Code of Conduct for Business Associates covers the working hours, wages and benefits as well as freedom of association. The number of employees/workers both male and female, who are part of any association(s) or Union at Nxtra in the financial year is reportedly Nil.	
GRI 3: Material Topics 2021				
3-1	Process to determine material topics	Materiality Assessment		
3-2	List of material topics	Materiality Assessment		
3-3	Management of material topics	Materiality Assessment		
GRI 203: Indirect Economic Impacts 2016				
203-1	Infrastructure investments and services supported	Community Engagement		
203-2	Significant indirect economic impacts	Community Engagement		
GRI 204: Procurement Practices 2016				
204-1	Proportion of spending on local suppliers	Supporting Local suppliers		
GRI 205: Anti-corruption 2016				
205-1	Operations assessed for risks related to corruption	Nxtra follows the group level format procedure to investigate and address any complaint on bribery/corruption and takes suitable disciplinary action in accordance with its Consequence Management Policy. Such misconduct is periodically reported to the Audit Committee of the Board. Disciplinary actions can include penalties, legal action and even termination of employment or business contract, depending upon severity of the breach.		
205-2	Communication and training about anti-corruption policies and procedures	Ensuring Compliance and Excellence		

GRI Standard & Disclosure sub-sections	Details	Section	Data Points	Reason for Omission 2024
205-3	Confirmed incidents of corruption and actions taken	Number of Directors/ KMPs/employees/ workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/corruption in the reported financial year is Nil		
GRI 302: Energy 2016				
302-1	Energy consumption within the organisation	Advancing Sustainability: Our Energy Management Strategy		
302-2	Energy consumption outside of the organisation	1. Advancing Sustainability: Our Energy Management Strategy 2. The blueprint for achieving Zero Emissions		
302-3	Energy intensity	Advancing Sustainability: Our Energy Management Strategy		
302-4	Reduction of energy consumption	1. Advancing Sustainability: Our Energy Management Strategy 2. The blueprint for achieving Zero Emissions		
GRI 303: Water and Effluents 2018				
303-1	Interactions with water as a shared resource	Championing Water stewardship		
303-2	Management of water discharge-related impacts	Championing Water stewardship		
303-3	Water withdrawal			Nxtra is in the process of upgrading its water related infrastructure by incorporating requisite retrofits. We should be able to incorporate and disclose the relevant information in future sustainability report.
303-4	Water discharge			Nxtra is in the process of upgrading its water related infrastructure by incorporating requisite retrofits. We should be able to incorporate and disclose the relevant information in future sustainability report.

GRI Standard & Disclosure sub-sections	Details	Section	Data Points	Reason for Omission 2024
303-5	Water consumption			Nxtra is in the process of upgrading its water related infrastructure by incorporating requisite retrofits. We should be able to incorporate and disclose the relevant information in future sustainability report.
GRI 305: Emissions 2016				
305-1	Direct (Scope 1) GHG emissions	The blueprint for achieving Zero Emissions		
305-2	Energy indirect (Scope 2) GHG emissions	The blueprint for achieving Zero Emissions		
305-3	Other indirect (Scope 3) GHG emissions	The blueprint for achieving Zero Emissions		
305-4	GHG emissions intensity	The blueprint for achieving Zero Emissions		
305-5	Reductions of GHG emissions	The blueprint for achieving Zero Emissions		
305-6	Emissions of ozone-depleting substances (ODS)			Nxtra conducts biannual emission monitoring as stipulated by respective SPCB consents. It is in the process of collating reliable information to support the disclosure requirement and should be able to incorporate and disclose the relevant information in future sustainability report.
305-7	Nitrogen oxides, sulfur oxides and other significant emissions			Nxtra conducts biannual emission monitoring as stipulated by respective SPCB consents. It is in the process of collating reliable information to support the disclosure requirement and should be able to incorporate and disclose the relevant information in future sustainability report.
GRI 306: Waste 2020				
306-1	Waste generation and significant waste-related impacts	Waste Management Redefined		
306-2	Management of significant wasterelated impacts	Waste Management Redefined		

GRI Standard & Disclosure sub-sections	Details	Section	Data Points	Reason for Omission 2024
306-3	Waste generated	Waste Management Redefined		
306-4	Waste diverted from disposal			
306-5	Waste directed to disposal			Nxtra is in the process of upgrading its waste tracking mechanism. We should be able to incorporate and disclose the relevant information in future sustainability report.
GRI 308: Supplier Environmental Assessment 2016				
308-1	New suppliers that were screened using environmental criteria	Promoting Responsible Sourcing		
308-2	Negative environmental impacts in the supply chain and actions taken	Promoting Responsible Sourcing	No. of suppliers assessed for environment impact: 24	
GRI 401: Employment 2016				
401-1	New employee hires and employee turnover	From Potential to Performance	Employee turnover: 14% by Gender Male: 21.4% Female: 36.6%	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Empowering Labour with Integrity		
401-3	Parental leave	Parental Benefits	Total no. of employees that took parental leave: 0 Return to work: 100% (by gender also 100%)	
GRI 402: Labor/Management Relations 2016				
402-1	Minimum notice periods regarding operational changes	Engaging and nurturing talent culture		
GRI 403: Occupational Health and Safety 2018				
403-1	Occupational health and safety management system	EHS management System		
403-2	Hazard identification, risk assessment, and incident investigation	EHS management System		
403-3	Occupational health services	EHS management System		
403-4	Worker participation, consultation, and communication on occupational health and safety	EHS management System		
403-5	Worker training on occupational health and safety	Topic-focussed training conducted		

GRI Standard & Disclosure sub-sections	Details	Section	Data Points	Reason for Omission 2024
403-6	Promotion of worker health	Strengthening Safety awareness		
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	EHS management System		
403-8	Workers covered by an occupational health and safety management system	Nurturing Health & Safety		
403-9	Work-related injuries	Safety Objectives	No. of Fatalities: 0 TRIR: 0.025 LTIFR: 0.13 Recordable incidents: 1 WPS(Projects): 0.088	
403-10	Work-related ill health	Safety Objectives		
GRI 404: Training and Education 2016				
404-1	Average hours of training per year per employee	Cultivate ongoing learning culture		
404-2	Programmes for upgrading employee skills and transition assistance programmes	Cultivate ongoing learning culture	% of employees trained on skill upgradation:64%	
404-3	Percentage of employees receiving regular performance and career development reviews	Performance and Growth review	Performance and Career development review Total: 91% Male: 91% Female: 94%	
GRI 405: Diversity and Equal Opportunity 2016				
405-1	Diversity of governance bodies and employees	Promoting a diverse environment	"Women in management workforce (in%): 6.8% Women in junior management position (in %): 11.6% Women in top management position (in %): 0%"	
405-2	Ratio of basic salary and remuneration of women to men			Reliable information to support the disclosure requirement is not completely available. However, the Company will incorporate relevant Information in future sustainability reports.
GRI 406: Non-discrimination 2016				
406-1	Incidents of discrimination and corrective actions taken	Upholding Labour Practices and Human rights	0 incidents	

GRI Standard & Disclosure sub-sections	Details	Section	Data Points	Reason for Omission 2024
GRI 408: Child Labor 2016				
408-1	Operations and suppliers at significant risk for incidents of child labor	Upholding Labour Practices and Human rights		
GRI 409: Forced or Compulsory Labor 2016				
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor			
GRI 412: Human Rights Assessment				
412-2	Employee training on human rights policies or procedures	Upholding Labour Practices and Human Rights	100% completion of Human rights training	
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening			Reliable information to support the disclosure requirement is not completely available. However, the Company will incorporate relevant Information in future sustainability reports.
GRI 413: Local Communities 2016				
413-1	Operations with local community engagement, impact assessments, and development programmes	Creating value for Society		
413-2	Operations with significant actual and potential negative impacts on local communities	Creating value for Society		
GRI 418: Customer Privacy 2016				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Securing Confidentiality		



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INDEPENDENT ASSURANCE STATEMENT

Independent Assurance Statement to Nxtra Data Limited on its Sustainability Report for the Year 2023-24

Nature of The Assurance/Verification

SGS India Private Limited (hereinafter referred to as SGS India) was commissioned by Nxtra Data Limited (hereinafter referred to as "Nxtra") to conduct an independent assurance of its Sustainability Report 2024 (hereinafter referred to as "the Report"). The scope of the assurance is based on the SGS Sustainability Report Assurance methodology, including the stakeholder management process, data on greenhouse gas (GHG) emissions, energy consumption, water consumption and disposal, waste, social data, and the management systems supporting the reporting process. This engagement was performed in accordance with ISO 14064:3-2019 Standard and AA1000v3 (Moderate type 2) Accounting standard.

Intended Users of this Assurance Statement

This Assurance Statement is provided with the intention of informing all Nxtra Data Limited's Stakeholders.

Responsibilities

The information in the Sustainability Report and its presentation are the responsibility of the directors or governing body and the management of Nxtra Data Limited. SGS India has not been involved in the preparation of any of the material included in the Report. Our responsibility is to express an opinion on the text, data, graphs, and statements within the scope of verification with the intention to inform all Nxtra's stakeholders.

Assurance Standards, Type and Level of Assurance

The SGS protocols are based upon internationally recognized guidance, including the Principles contained within the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines for accuracy and reliability and the guidance on levels of assurance contained within the AA1000 series of standards and guidance for Assurance Providers.

This report has been assured at a moderate level of scrutiny using the protocols for:

- AA1000 Assurance Standard (V3) Type 2 evaluation of the report content and supporting management systems against the AA1000 Accountability Principles (2018) of inclusivity, materiality, responsiveness, and impact.
- Verifying the reliability of the specified environmental performance indicators (greenhouse gas emissions and water data) against GHG Protocol and ISO14064-3(2019) (for GHG emissions)

Scope of Assurance

SGS India was engaged with Nxtra Data Limited to assure its data and claims in the Sustainability Report, encompassing the period of 1st April 2023 to 31st March 2024. The scope of the assurance included the evaluation of quality, accuracy, and reliability of specified performance information:

Specified Performance Information and Disclosures Included in Scope

SGS India verified the following ESG parameters given in the Table below:

GRI Topic	GRI Disclosure
GRI 204: Procurement Practices	204-1
GRI 205: Anti-corruption	205-1, 205-2
GRI 302: Energy	302-1, 302-3
GRI 303: Water and Effluents	303-3, 303-4, 303-5
GRI 305: Emissions	305-1, 305-2, 305-3, 305-4, 305-6



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GRI Topic	GRI Disclosure
GRI 306: Waste	306-2, 306-3, 306-4
GRI 401: Employment	401-1, 401-2, 401-3
GRI 403: Occupational Health and Safety	403-1, 403-2, 403-4, 403-5, 403-7, 403-8, 403-9, 403-10
GRI 404: Training and Education	404-1, 404-2, 404-3,
GRI 406: Non-discrimination	406-1
GRI 418: Customer Privacy	418-1

Assurance Methodology

The assurance comprised a combination of pre-assurance research, interviews with the managers, and professionals engaged in the process of developing the Sustainability report, on-site visits (Nxtra Head Office), a virtual inspection of data, verification and confirmation of vouchers and bills, review of related materials and records and analytical procedures to calculate the environmental impact. Specifically, SGS India executed following activities:

- Review the materiality assessment process employed by Nxtra to identify ESG priorities which are relevant to its business and important to its stakeholders.
- Interviewing managers and professionals responsible for data collection, analysis, and collation
- Review internal control mechanisms to ensure the reliability and accuracy of environmental data.
- Review the data management system used for collection and consolidation of environmental data.
- Assessment of the extent to which Nxtra's sustainability activities adheres to the Principles of AA1000 Standards
- Review of consistency of data/information within the report and between the report and source.
- Verification of environmental performance data, on sample basis, including a conversion factors and emissions factors and calculation, based on our professional judgement.
- Evaluation of the appropriateness of the quantification methods used to arrive at the environmental disclosures presented in the Report.

Limitations

SGS India did not come across any limitation to the agreed scope of the assurance engagement. SGS India verified data on a sample basis; the responsibility for the authenticity of data entirely lies with the Company. Financial data drawn directly from independently audited financial accounts, has not been checked back to source as part of this assurance process. The assurance scope excluded forward-looking statements, product- or service-related information, external information sources and expert opinions.

Statement of Independence and Competence

The SGS Group of companies is the world leader in inspection, testing and verification, operating in more than 140 countries and providing services including management systems and service certification; quality, environmental, social, and ethical auditing, and training; environmental, social and sustainability report assurance. SGS affirm our independence from Nxtra data Limited being free from bias and conflicts of interest with the organization, its subsidiaries, and stakeholders.

The assurance team was assembled based on their knowledge, experience, and qualifications for this assignment, and comprised auditors registered with lead auditors of ISO14064. The assurance team is highly competent and experienced on sustainability aspects and ESG, GRI, BRSR and Integrated reporting.

Findings and Conclusions

Within the scope of the assurance activities employing the methodologies described above, nothing has come to our attention that caused us to believe that the information and data contained within the Report do not provide a fair and balanced description of Nxtra's sustainability activities from 1st April 2023 to 31st March 2024.



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Quality and reliability of specified performance information

SGS India reviewed the environmental, social and governance data included in the Sustainability report. Nxtra has developed a good data management system to collect, analyze and collate ESG data. Based on the evaluation of this system, SGS found that data was accurate, and any minor corrections were made as necessary. We believe that Nxtra has chosen an appropriate level of assurance for this stage in its reporting.

Adherence To AA1000 Accountability Principles Standard (2018)

Inclusivity

Nxtra engages with its wide range of internal and external stakeholders on its sustainability initiatives, including employees, shareholders, investors, communities, vendors, contractors, customers, governments, and regulatory authorities. Nxtra has developed a stakeholder engagement framework that guides the company to effectively engage with its stakeholders and respond to their concerns. The list of stakeholders, channels of communications, frequency of communications and their concerns raised have been communicated publicly through the Sustainability report. Nxtra engages with stakeholders through emails, exchange meetings, conferences, press releases and various types of reports. SGS has confirmed the above processes through the assurance.

Materiality

Nxtra has established effective processes for determining issues that are material to the business. Formal review has identified stakeholders and those issues that are material to each group and the report addresses these at an appropriate level to reflect their importance and priority to these stakeholders.

Responsiveness

Nxtra responds to all stakeholder feedback related to environmental and social sustainability through its stakeholder engagement plan and grievance redressal mechanism. This process has been developed to receive, assess, respond to, and resolve stakeholder concerns and expectations fairly and promptly. Based on stakeholder expectations, Nxtra regularly shares its sustainability performance through annual and audit reports with its investors and shareholders. Furthermore, Nxtra has developed various committees to ensure its environmental performance and as a response to its stakeholder expectations. SGS India has confirmed the above processes through the assurance.

Impact

Nxtra has demonstrated a process of identifying and fairly representing impacts that encompass a range of environmental, social and governance topics from a wide range of sources, such as activities, policies, programs, decisions and products and services, as well as any related performance. Nxtra has disclosed the results of the identified material topics through various platforms including the Sustainability report. These reports include the impact on the natural environment and the community where it operates. Measurement and evaluation of its impacts related to the material topic were in place at the target setting with a combination of qualitative and quantitative measurements. SGS India has confirmed the above processes through the assurance.

For and on behalf of SGS India Pvt Ltd.
Ashwini K. Mavinkurve,



Head – ESG & Sustainability Services,
Pune, India
07.08.2024



Nxtra

by  airtel

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