

beyond tomorrow

Sterlite Technologies Limited
Annual Report 2018-19



Responsible Corporate Citizenship

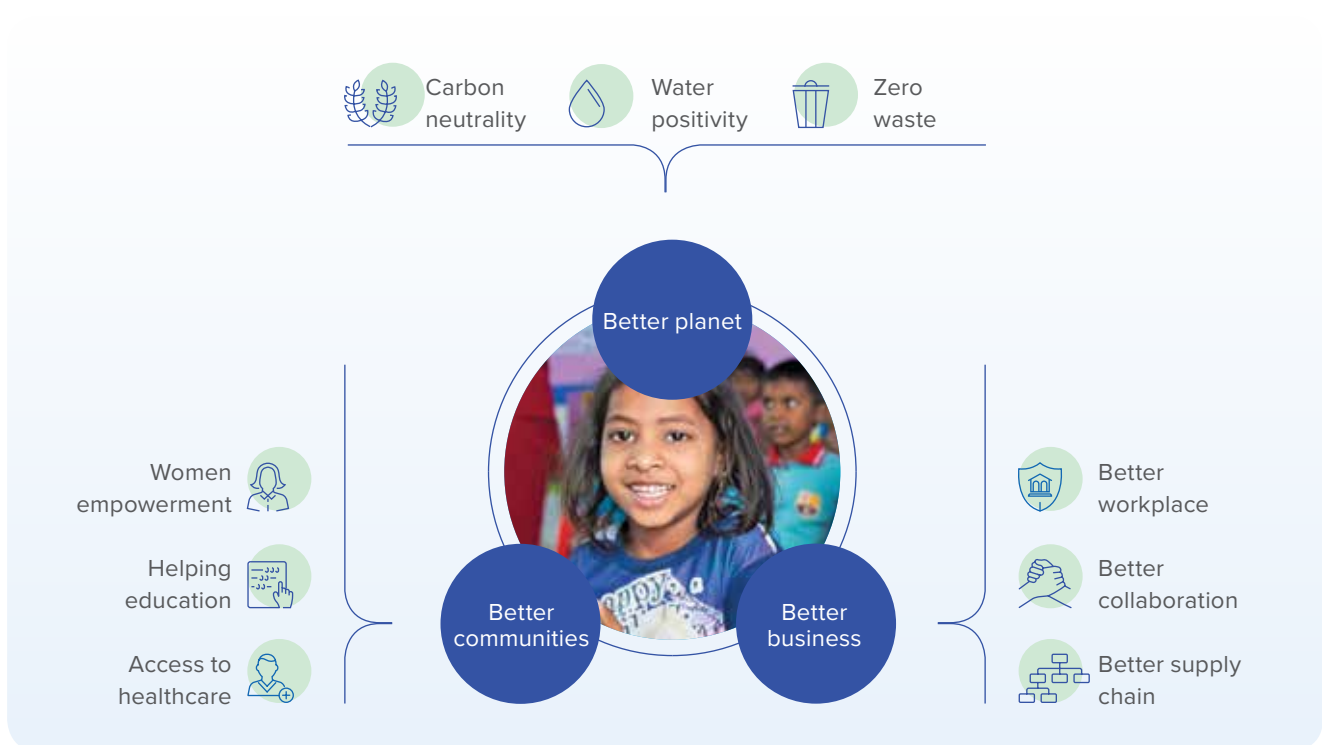
Creating value for communities and the environment

At STL, we are committed to conducting our business responsibly and sustainably, through engagement and dialogue with all key stakeholders.



Sterlite Technologies Limited (STL) believes that for a business to truly be successful, it needs to establish a robust foundation of corporate citizenship where every interaction is guided by strong moral and ethical standards. There also needs to be a balance between the requirements of shareholders, the community and the environment surrounding the business' operations. A robust social and environmental performance is no longer simply a 'nice to have' element, but a business imperative.

Using this approach, STL delivers 'shared value' by optimising its core competencies to address operational challenges in the environmental, social, and governance (ESG) aspects of the business. This allows us to create both business and social value in countless ways, from establishing innovative community involvement partnerships to engaging with stakeholders and assess ESG impacts and opportunities.



Transforming Everyday Living through Value Creation

From a fiscal viewpoint, value is created for stakeholders when the revenue a business earns surpasses its expenditure. However, at STL, we place emphasis on much more than simply fiscal value creation. We aim to 'create shared value' for all our stakeholders by continually ensuring responsible corporate citizenship.

We ensure all our operations are consistently driven through unrelenting focus on technology, innovation and sustainability. The combination of these not only help develop the communities we operate

in, but also deliver enormous benefits to stakeholders across the value chain as well as the business.

Sustainability and corporate social responsibility are thus at the forefront of how we drive our purpose of - Transforming Everyday Living by Delivering Smarter Networks. In FY19, it has not only enabled us to deliver on the triple bottom line and contribute to building a connected nation, but also map our transition into an organisation with minimal impact on the environment.



Responsible Corporate Citizenship contd.

Stakeholder Engagement and Materiality Assessment

Stakeholder Engagement

Engaging with our esteemed stakeholders meaningfully and forging long-lasting relationships has been and continues to be integral to the way we conduct our business. Proactive engagement helps us anticipate potential risks and opportunities. These can significantly impact the business and affect our ability to achieve strategic goals.

We aspire to create long-term value for our stakeholders and recognise that regularly engaging with them is essential to achieve sustainable success. Through our robust stakeholder identification, prioritisation and engagement approach we are able to understand their needs and expectations, and subsequently address them through our business strategies.

Stakeholder Groups

Employees



Mode of Engagement

Townhalls, all hands meeting, leadership shop floor visits, performance management systems, one-to-one interactions, trainings, induction workshops

Topics of Engagement

Professional growth, skill development, increasing diversity, competency enhancement

Communities



Community visits, social needs and impact assessment, philanthropic engagement, employee volunteering activities

Development projects according to the identified needs, support to social causes

Shareholders



Annual general meeting, performance calls, interaction with investors

Economic value creation, disclosure on Environment, Social and Governance (ESG) performance

Customers



Plant visits, customer satisfaction survey, key account management, conferences and events

New product development, research and innovation, delivery compliance, customer satisfaction

Suppliers



Supplier meets, supplier plant visits, relationship management

Supplier satisfaction, material compliance, joint development, mutual value creation

Materiality Assessment

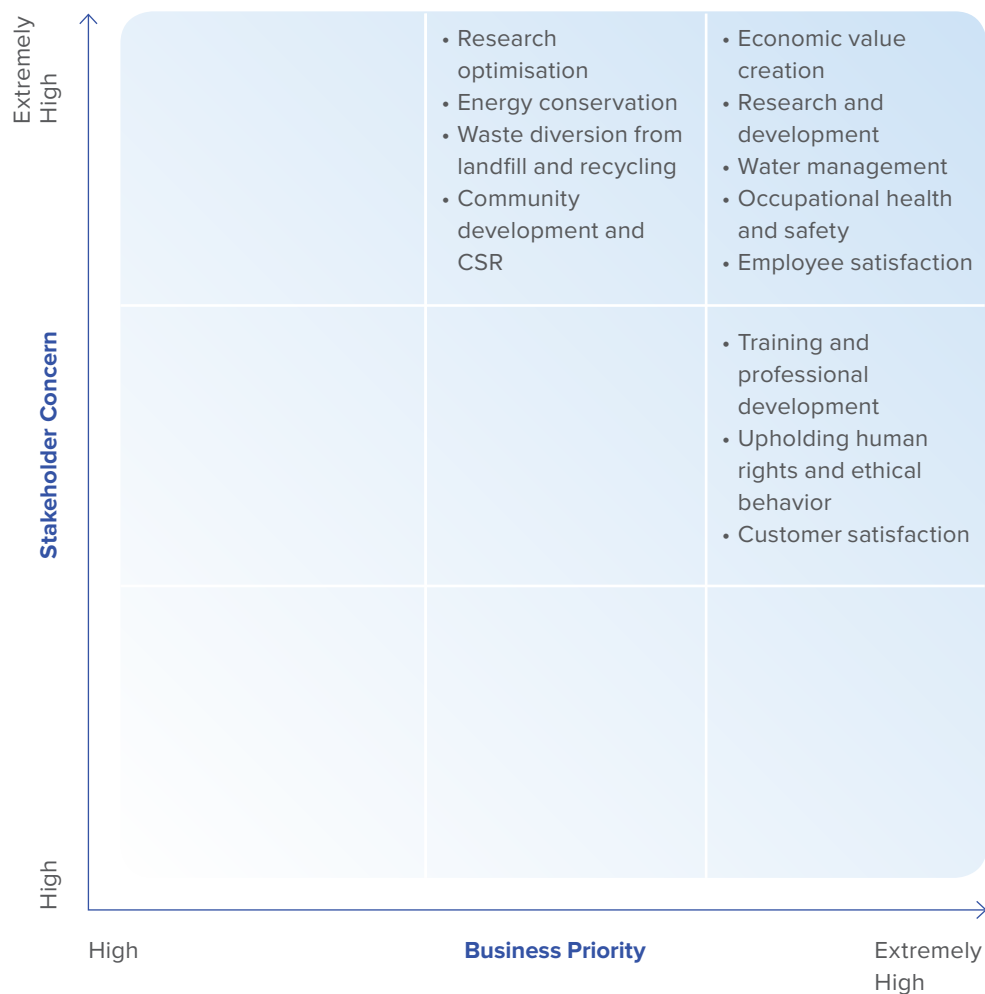
Sustainability topics identified through our exhaustive stakeholder engagement process are classified and prioritised through a rigorous framework. This helps us decide which topics are material, i.e., critical to the business and at the same time important to our stakeholders.

These act as vital elements in shaping our strategy and long-term vision. They are derived from ESG frameworks such the Global Reporting Initiative (GRI), global initiatives such United Nations Global Compact and United Nations Sustainable Development Goals.

In FY19, we conducted a comprehensive and detailed exercise with business leadership to understand the impact and significance of each sustainability topic on our business activities. Further, through regular engagement with stakeholders, we prioritised topics that were most important for the organisation.

We have established a sustainability roadmap complete with targets and performance indicators to monitor our progress towards addressing these identified material topics.

Materiality Matrix



Responsible Corporate Citizenship contd.

Focus on Environment Excellence

Being a responsible corporate citizen is about taking complete responsibility for operations across our entire value chain right from sourcing to designing, manufacturing, transportation to our customers and ultimately the user. What we take in the form of natural resources, our raw materials; how and what we make in terms of the quality and durability of our products; and what we waste, are in fact all a question of ethics. Thus, as a global business, it is vital that we not only ensure sustainable and responsible sourcing and manufacturing, but also work towards mitigating global issues and conserving the environment we operate in.

The journey towards being a responsible corporate citizen begins

with responsible sourcing. We thus ensure all our suppliers are complaint to stringent human rights practices, source the raw material sustainably and conduct their operations in an eco-friendly manner.

The next step is ensuring we design products that are best-in-class and highly durable while utilising minimum resources. While manufacturing these products, we utilise natural resources, which increases our environmental footprint. We have hence invested in conducting our operations in an environmentally sound manner and have proactively adopted technologies that reduce our impact on nature.

Once products are manufactured, transporting them safely and using

packaging material that will have minimal influence on the environment is important. Concurrently, ensuring transportation of by-products and waste from the manufacturing location in a way that does not affect the environment is equally crucial. We thus use technology—our core expertise—to ensure our products and by-products both safely reach our customers and recycler, respectively.

Lastly, we strive to ensure that the waste we generate through our manufacturing processes does not go to landfill. We have hence worked on ensuring and identifying partnerships with industries where they can be reused, thereby increasing their lifecycle and diverting them away from landfill.

The following sustainability-related data covers our optical fibre operations in Aurangabad and cable manufacturing units in Silvassa. The reporting boundary does not include operations outside India as well as non-manufacturing facilities such as offices in India.

To summarise, our sustainability mission is to be a responsible leader in ensuring India’s connected future benefits for

Our Communities	Our Environment	Our People	Our Conduct
By delivering life-changing services and technologies, thereby enabling a brighter future	By developing system-wise approaches that will reduce our environmental footprint with economic returns in the long run	By ensuring that they are healthy, safe, engaged and inspired to drive inclusive, equitable growth	By creating sustainable practices, policies and business models that will support the growth of our business and communities

Creating Shared Value



We are determined to set a benchmark for what it means to be a responsible corporate citizen in India. FY19 was the year, we achieved several milestones in this regard.

The UN Global Compact

The trust of our stakeholders has always been a priority for us.

Transparency, regulatory compliance and a robust code of conduct and ethics policy guide our processes, operations and culture. We have always endeavored to positively contribute towards the protection and fulfilment of human and labour rights whether through our core business, strategic social investments or collective action. The safety and wellbeing of our people and the communities surrounding our operations is paramount.

During FY19, we became a signatory to the UN Global Compact (UNGC), the world's largest corporate sustainability initiative. This alliance solidified our pledge towards responsible business practices in the areas of human rights, anti-corruption, fair labour and conserving the environment. It reinforced our commitment to ethics, diversity, non-discrimination and transparency in operations.

While our operations have always been aligned to the UN Sustainable Development Goals (SDGs), during FY18 we formally mapped our activities with the UN SDGs. In FY20, we will begin communicating our progress on each of the 10 principles of the UNGC.



Sustainability across the Supply Chain

Sustainability is not just about responsible manufacturing operations. The way raw materials and finished products are managed, used and transported, all play a vital role in determining the extent to which sustainability is embedded into an organisation's processes and values. Our partners also play a critical role in our commitment to operate responsibly.

Chemical Management

At STL, we critically evaluate each of our suppliers to ensure they operate sustainably even outside our manufacturing facilities. This involves adherence to robust procurement policies, which guarantees full compliance from our suppliers on set regulations. Checks such as lab test reports and declarations among others form part of the procurement process. These stringent mechanisms have enabled us to meet with rigorous international requirements such as the Restriction of Hazardous Substances (RoHS) and Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulations for our products. This is despite our products requiring the use of several chemicals such as resins, inks, coatings and jelly, along with polymers such as polyethylene, nylon and polyester, among others.

Developing Smarter Networks

Owing to the nature of our products, regulations and specific customer needs, our choice of suppliers includes a mix of national and international dealers. However, realising the risk to maintaining such a mix, we have, over the last few years, intensified our commitment to develop and partner with promising suppliers around our manufacturing facilities for continued improvement. Through our capacity building programmes, we have engaged and developed local partners to produce and supply superior quality Fibre Reinforced Plastic (FRP) and wood drums. Simultaneously at Aurangabad, we share inputs on enhancement in quality, competence augmentation and other factors through partner audit programmes.

We have developed a vendor selection process, which prioritises environmental and societal aspects and regularly monitors each of our suppliers. This ensures that each of our partners operate according to the UNGC Network principles, which we abide by. We have been working with them to develop similar quality materials, thus creating alternative sourcing, as well as reducing the procurement distance.



34%

We have continued to localise sourcing thus being able to procure 34% of raw materials and packaging requirements by value from India

Hence, as a part of our commitment to responsible corporate citizenship, we procure all non-critical materials such as packaging, machine spares and job work, among others from local vendors. We collaborate with these vendors to improve their skills and ensure that they meet the quality requirements.

This collaboration allows us to share the financial value created with our partners as well as contributes to the economic development of the region.

Responsible Corporate Citizenship contd.

Quality products that are good for the customer and the environment



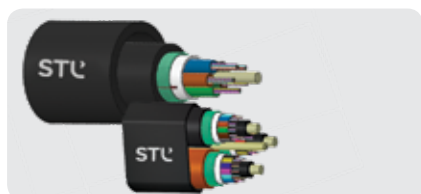
STL is a customer-focussed organisation. Our objective is to provide high-quality products and services that do not just meet but exceed our clients' expectations as well as the experience of the end user. This is our way of showing them we are committed to our purpose of 'Transforming Everyday Living by Delivering Smarter Networks'.

However, while doing so, equal importance is given to reducing the environmental impact the product will have at every stage, right from raw material extraction, to manufacturing, use and its eventual end-of-life. By substituting the materials we use for our products, using innovative designs and light weighting among other

approaches, we have incorporated lifecycle thinking into our products right at the development phase. This has substantially improved the sustainability credentials of the products we manufacture, such as reducing our carbon footprint, among others. It has also simplified enabling a sustainable and connected future globally. This is also driven through a robust Quality, Environment Health and Safety (QEHS) policy. The policy aims at enhancing customer satisfaction through proactive engagement to understand their changing requirements. It also details our assurance to persistently advance quality parameters, recycle and decrease waste, discharge and

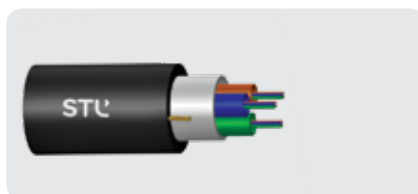
emissions as well as avert or reduce impact on people; thus creating further value for our customers.

Quality products coupled with knowledge on how to use and maintain them enhances their durability. Increased durability is part of our commitment to the greater good. It means we use less and waste less through reduced replacement and repairs. We have hence integrated our offerings with certified trainings by experts on how not just our products, but the entire lines we lay should be used and maintained to lower the wear and tear or prevent downtime. This improves our customers' efficiency and effectiveness and the end users experience when using their products.



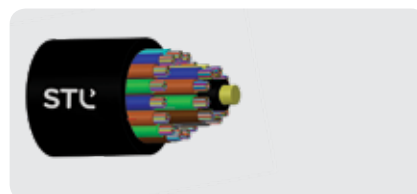
MobiLite & MultiLite

A future-proof, green and unique one-step solution for underground deployment for fibre backhaul, 2X network building and FTTx



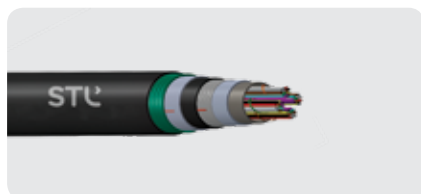
Work Safe Lightweight Overhead Cable

This fibre drop cable meets the breaking load requirement of 1350-1800 N in the interests of safety for overhead applications



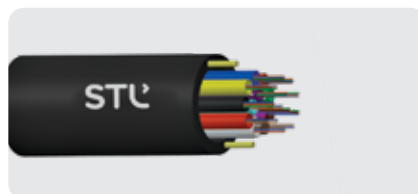
Micro Bullet Series – up to 288F

Re-engineered buffer tube material for optimum cable packing efficiency.



Olympus Lite Cable

Withstands extremely high temperatures and fire conditions.



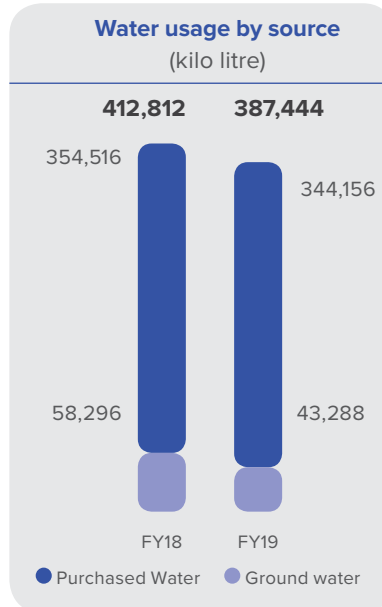
Indicium Lite Cable

This solution helps in efficient deployment with zero fibre cuts.

Additionally, we have a team devoted to ensure manufacturing excellence. Together with the procurement management team they work to identify suppliers of cables which are more resistant to breakage. This not only results in significant process waste reduction, better finished products and customer satisfaction, but also helps conserve resources and reduce emissions.

Zero Water Discharge

The optic fibre and cables manufacturing processes are not water intensive. Water is primarily used for industrial cooling, in boilers and for domestic use. However, we still attempt to keep our consumption of this precious resource at a minimum considering the scarcity across the country. With advanced water treatment facilities, we are able to continually increase the reuse potential of waste water, thereby limiting our intake of fresh water. We also treat and reuse domestic effluent, which is channeled back for use in gardening and horticulture.



Our approach to decrease our freshwater intake



Aside from the efforts at our manufacturing facilities, we strive to impart sustainable water usage practices even among our employees. We observe events like 'World Water Day' where we conduct organisation-wide awareness campaigns on how employees can reduce, recycle and reuse water at the workplace and their homes.

78,620 m³

During FY19, our manufacturing facilities in India have used 3,87,444 m³ of water.

78,620 m³ of water was recycled and reused at our manufacturing facilities in India.



Zero Waste to Landfill



Any process waste is viewed as a lost prospect to convert raw materials into finished products. Hence, we survey every level of waste management to create opportunities for generating value. This comprises waste produced at source, primary waste collection, storing and subsequent disposal.

One of the most significant achievements in FY19 was our endeavour to divert waste from packaging and operations away from landfills and our ultimate goal

is: **To achieve Zero Waste to Landfill certification for all manufacturing units in India by 2020**

Zero waste to landfill is a specific goal to divert at least 99% of waste generated through business activities away from landfill. This means that all waste produced is either reused, recycled, composted or sent to energy recovery. The audit process and certification was conducted by Intertek, a global Total Quality Assurance provider.

The waste management journey has allowed us to continually enhance our processes. It has enabled us set a new baseline on waste grading, driving implementation of data collection and internal processes that is ultimately helping us move towards a more circular use of resources. This entire progression has not only aided us in achieving waste reduction and thus cost savings, but also unlocked several efficiencies in manufacturing.



Approach

1. Reducing **waste generation at source**, complemented with rigorous tracking, monitoring & corrective actions where needed
2. **Segregation, classification and categorisation** of waste to avoid contamination and maintain recyclability
3. **Priority to reuse and recycle** waste over landfills and incineration
4. **Ensuring legal compliance** of waste management rules in accordance to both Indian and global regulations.

These efforts further increase the lifecycle of products through reuse, recycling or redesign, thereby promoting a cradle-to-cradle approach for use of natural resources and raw materials. These initiatives have helped us in diverting over 36,300 MT of waste across all our manufacturing units in total from landfill.

Achievements

Our Dadra and Waluj manufacturing units diverted **96% of waste away from landfills** earning them a ‘Near Zero Waste to Landfill’ certification.

However, our manufacturing facility at Rakholi achieved the ‘Zero Waste to Landfill’ certification by diverting **99% of waste making it the first Optical Fibre Cables manufacturing unit in India to receive this certification.**

Salient facts

All waste buyers now must provide a declaration on the end-use of waste and an undertaking that any waste generated while recycling at their end will not be sent to landfill.

For transportation of hazardous waste and by-products such as hydrochloric acid (HCl), silica and hypochlorite, a GPS monitoring device is installed on the vehicles to ensure that there is no detour. Additionally, these vehicles are accompanied by an STL associate to ensure safe and secured delivery.



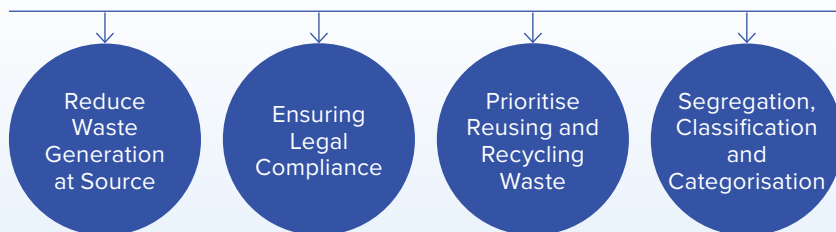
Responsible Corporate Citizenship contd.

Co-processing Case Study

Disposing optical fibre (OF) and cables waste as well as Low Smoke Zero Halogen (LSZH) is a major challenge globally. While common understanding is that OF waste is glass waste, it actually consists majorly of coating material which cannot be recycled as glass. Owing to this complexity, landfilling has traditionally been the only viable disposal mode. However, neither of these were an option due to the serious adverse impact they would have on the environment.

We finally achieved a breakthrough by successfully sending OF and LSZH waste to cement plants for co-processing where the waste is burnt substituting fuel. Due to the high temperature in the kiln used at cement plants, the waste burns completely with no adverse environmental impacts. This simple but effective solution comes with an enormous advantage of reducing the negative impact LSZH and OF waste has on environment, as well as diverting it away from landfill. Co-processing this waste has led to tremendous cost savings as well as diverted about 120 MT of LSZH and of waste from landfills.

Our Waste Management Strategy Involves



In another significant effort to decrease waste, we have reduced the use of overall packaging material for our products. We do this by using recyclable materials and reusing the packaging material multiple times before discarding it. In some cases, we have done away with packaging altogether. The 500 meter coils of cable we dispatch for last-mile connectivity is such an example, where the use of wooden drums has completely been eliminated. This approach reduces the weight and makes the coils easy to transport and use since they can be carried over the shoulder.

Packaging material accounts for a sizeable fraction of the total resource consumption for our products. We have thus tried to ensure that we source raw materials in larger

packaging making the cleaning and recycling process simpler. We have also replaced packaging material such as wood with plastic and metal substitutes, which can be reused and have a longer lifespan, thereby reducing the need for fresh material. We also rigorously monitor hazardous and even non-hazardous waste monthly.

While we ensure our processes comply with the stringent waste management rules in the country, we also verify the approaches our recyclers adopt. This assures us that they are operating according to the prescribed laws and our by-products or waste are further reused promoting a circular economy.

36,300+ MT

**Waste has been
diverted away from landfills
in FY19**

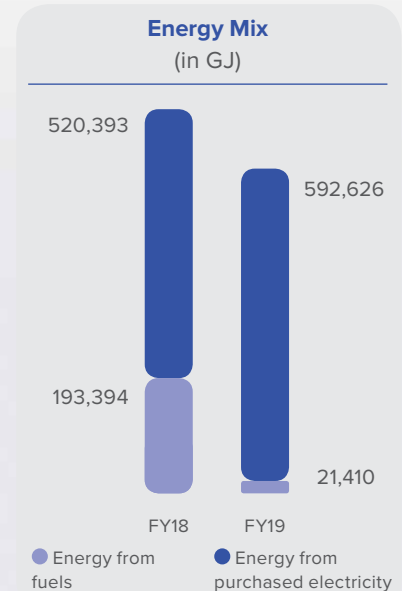


Reducing our Carbon Footprint and Energy Consumption

Energy conservation and greenhouse gas management are important aspects of our sustainability practices at STL.

While optical fibre and cables manufacturing are not energy intensive, the quantum of energy that we use and the greenhouse gases that result from this usage makes it a material issue for us. Apart from electricity and fuel use, greenhouse gases result from activities such as travel and certain refrigerants and cause global level issues such as climate variations.

We are continuously exploring ways to diminish our carbon footprint by meticulously tracing our emissions performance. We have extended the scope of our inventory to comprise scope 3 GHG emissions apart from the scope 1 and 2 emissions, which we monitor currently. Maintaining high-power factor while using electricity, using daylight by fitting transparent FRP sheets on shop floor roofs and adopting non-conventional and renewable sources of energy wherever possible are some of the efforts we have made in this direction



Greenhouse gas emissions from manufacturing facilities in India



Responsible Corporate Citizenship contd.

Leveraging technology and knowledge for the benefit of society

Part of being a corporate citizen involves being responsible to society at large; not only through eco-friendly operations, but also by mitigating the issues in areas we operate. It involves having a business model where financial returns coexist with corporate conscience. It is about being socially and ethically concerned. Thus, in addition to ensuring sustainability is embedded in our operations, we work on causes from conservational issues to community concerns in the areas we operate focussing on the environment, healthcare, women empowerment and education.

We have leveraged our expertise in technology and connectivity to ensure location is no longer a constraint for our beneficiaries. They can now access national markets and quality education, avail services essential for a healthy life as well as be surrounded by a green and safe environment to live in. The emphasis has always been on contributing to the protection and fulfilment of basic human rights through strategic social investments. During FY19, we transitioned into making this a collaborative goal, one where together with our employees, we could collectively help those less privileged to grow and ensure equal access to a better future for all.

This partnership enabled us reach out to over 205,200+ lives in FY19 alone. It took us a step closer to achieving our goal of reaching 1 million lives by FY20.

Material Topic
Local Communities

Goal
To impact 1 million lives by 2020



205,200+

Lives impacted in FY19

Education
186,400+ children benefitted



Health
14,500+ lives impacted



Environment
10,500+ trees grown



Women Empowerment
2,100+ lives improved



Employee Volunteering
2,200+ beneficiaries



Highlights of our CSR and Employee Volunteering programmes in FY19

Education

STL continued focussing on education during FY19; it being the main driver to the country's progress. In addition to the flagship programme, several other technology-related investments were made to ensure quality education is accessible to the masses in rural and semi-urban areas.

These include:

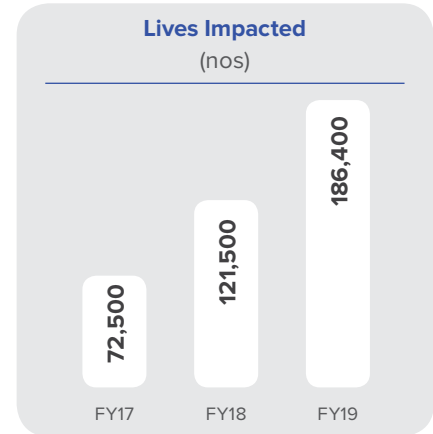
- **Virtual Classrooms**
- **Pragyan**
- **Smart Nandghars**
- **Laptop donations and scholarships were other smaller programmes**

The Virtual Classrooms project, since its launch in FY13 has ensured that reading, writing and speaking in English are no longer restricted to the privileged few. In FY19, over 182,000 students were covered under the project across Marathi, Hindi, Urdu and English medium schools.

It continued to be the largest virtual classroom programme in the country, reaching out to students from lower income families through sessions conducted by qualified experts. It is one of the few ed-tech initiatives in the country offering quality English education at par with private schools, to students of grades 5, 6, 7 and 10. The Virtual Classrooms project has been implemented in 480 Municipal Corporation of Greater Mumbai schools under Sterlite School Tech (SST).

Pragyan, another ed-tech initiative was implemented by SST in Jaipur with the sole aim of introducing quality education in rural and semi-urban municipal schools. Started in FY19, the programme has reached over 2,000 students and made learning interesting and enjoyable for them.

Another of our ed-tech initiatives, the Smart Nandghars focus on pre-school teaching. Pre-schooling is not a widely



known concept in rural areas and children are normally put into school much later, thereby making learning difficult for them. Through ed-tech facilities, vibrant infra and interiors, we are working on inculcating a love for learning among the children right from a young age of 2-3 years. Through the Nandghars, we aim to make schooling fun for these children. Colourful and vibrant visual aids and learning charts and play-kits help these children develop their cognitive skills as well as learn nursery rhymes, numbers and alphabets better.

4,53,700+

Lives impacted till date through educational initiatives

Responsible Corporate Citizenship contd.

Healthcare

We believe it is essential to work at the community level to provide access to quality healthcare as it helps reduce gaps caused by differences in earnings, education, ethnicity, location and other factors. A healthy community is capable of mutually supporting each other in regular activities, but most importantly allows them to focus on aspects such as education and work among other things. Members of such healthy communities can thus reach their maximum potential, which brings in a mindset change and eventually development.

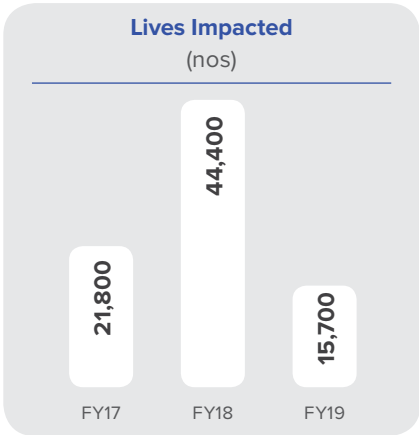
Our main healthcare initiative in FY19 has been

- **The Mobile Medical Unit**

Started in 2006, in partnership with the Indian Red Cross at Silvassa, the Mobile Medical Unit (MMU) in FY19 completed 12 years of untiringly providing primary healthcare facilities to tribals in the region.

The 24 villages the MMU services do not have basic medical facilities even within a radius of 10 kms. This leads to huge healthcare costs for the residents as their community primarily comprises daily wage earners. The health of the elderly and children were often neglected due to work shifts and the remoteness of the villages.

Through weekly visits at their doorsteps, the MMU has minimised these issues. It not only provides free health check-ups, but also distributes free medicines to the villagers. In emergencies, it helps them by serving as an ambulance to take critical patients to the city hospital free of cost. The tribals today diligently follow the advice of the doctor and come in for follow-up medication and check-ups. These communities are now healthier with the incidence of diseases reduced by 34%. They are aware of precautionary measures to be taken as well as how to identify certain symptoms, which can be treated early to avoid outbreaks.



298,000+

Lives impacted till date through healthcare interventions



Women Empowerment

Our flagship programme for women empowerment is

- **Jeewan Jyoti Women Empowerment Programme**

Setup in 2014 at Ambavane, Velhe, the purpose of the Jeewan Jyoti Women Empowerment Programme (JJWEP) is to equip rural women with vocational skills in computers, tailoring, nursing and beauty culture that will propel them towards financial independence. However, empowerment is not possible just through financial independence. The programme therefore encompasses various other facets such as confidence building, public speaking, knowledge of health and nutrition, life skills and even provides necessary help for entrepreneurship and employment. It works to create self-reliant, confident and financially independent women who are aware of their potential and

the change they can make to the communities they live in. They are made to understand the importance of education and gender equality.

After five years in the region, there is a visible difference in the socio-economic condition of these women. The marriageable age for women has increased from around 16 years to over 20 years. They partake in decision-making and even contribute to their family's income. Today families in the region are supportive of educating their daughters. Women now follow their ambitions and some of them like Rupali Dimle, Vandana Sanas and Shashikala Wagh, among others have setup their own businesses. To promote excellence and increase the exposure students receive, we have introduced an internship for the top three students of the computer batch at our Pune Head Office.



During FY19, the JJWEP had the highest number of admissions, 421 students. The programme is one of the few in the country to provide the students with transport facilities in view of the lack of public conveyance in the region. This has helped women even in remote villages to avail of the programme's benefits.

7,500+

Lives impacted till date



Responsible Corporate Citizenship contd.

Environment

While we ensure sustainability is at the core of how we function, we also take cognisance of the environmental issues the communities surrounding our operations face. Afforestation and Water Conservation are thus two of STL's main environment-related focus areas which are implemented through:

- **Project Green Belt**
- **Jaldoot**

Project Green Belt was initiated in 2016 in an endeavour to alter the MIDC stretch of land outside our Waluj manufacturing unit, which was being used as a garbage dump by the public. Several power lines and open sewage drains made it dangerous for pedestrians. Besides, with Aurangabad being an industrial area, increasing the green cover in the region was essential.

Hence, we developed 700 meters of the MIDC road and transformed it into a green belt. During FY19, we developed another 700 meters covering both sides of the road. Trees with air filtration features were mainly planted through active participation by our employees. The entire 1.4 kms road consists of over 10,000 trees and plants all helping to facilitate a cleaner and green environment.

Jaldoot, a watershed development programme helped farmers in drought-affected Aurangabad to reap a plentiful harvest. While the rains in the region were absent, the groundwater percolation facilitated through Jaldoot helped these marginal farmers earn a livelihood.



67,900+

Lives Impacted through environment interventions



Fostering a Conscientious Work Culture to Increase Inclusivity

At STL, our transformation enablers are our employees. Together with them, we aim to exponentially enhance our community outreach programmes while simultaneously building a culture with a conscience. A culture where we use less, waste less and reuse more; not just at our manufacturing facilities, but also at our offices and project sites. A culture where together with our employees – the smarter network we leverage; we transform everyday living for our beneficiaries through shared knowledge, care and responsible behaviour.

FY19 was a year where our volunteering and awareness interventions stood testament to this commitment.

- **Daan Utsav**
- **Saksham**
- **Tree Plantations**
- **Blood Donations**
- **Waste Reduction and other awareness campaigns**

Daan Utsav celebrated during October witnessed over 110 employees volunteer to #GiftAWish to needy children. They fulfilled wishes of more than 700 children. While the children were ecstatic visiting manufacturing plants and offices for the first time, employees actively participated and enjoyed their interactions with the children. Employees even visited the NGOs to distribute gifts to the children and celebrate Diwali with them.

Saksham, a mentoring initiative was started in FY19 to equip the JJWEP students with essential soft skills they need when interacting socially or at interviews, etiquette, digital awareness and even basic spoken English; all of which we believe will help them develop themselves to reach their true potential. Till date 15 employees have volunteered to mentor the students. The format of the programme ensures personal attention to every beneficiary, which enhances the learnings the students take back. Over 160 students have benefitted through Saksham.

Through regular tree plantations by employees on days like Earth Day, World Environment Day, over 140 trees have been grown. Additionally, the #GreenAurangabad Challenge conducted as part of Project Green Belt, witnessed 470 employees plant over 1,400 trees and plants in less than two hours.

Blood donations are another regular activity we conduct across locations at STL. Till date over 4,200 lives have been saved through the blood donated by our employees. During FY19, over 400 units of blood were donated.

Apart from these regular volunteering activities, employees visit NGOs on days like Women's Day and Children's Day, among others to create awareness among the women and children on their rights, the necessity for education and even to simply spend time with them and show them the world still cares.

Overall, in FY19 employees clocked over 2,100 volunteering hours reaching more than 2,200 beneficiaries.

2,500+

Employee volunteers till date

4,100+

Volunteering hours clocked



Responsible Corporate Citizenship contd.

Recognition for the Work Done

We are grateful to the various industry bodies that have recognised our CSR and sustainability efforts. The awards won in FY19 include:



India International CSR Conclave Project of the Year Award for Education (Virtual Classrooms)



India CSR Network Project of the Year Award for Women Empowerment (Jeewan Jyoti Women Empowerment Programme)



Grow Care India Sustainability & Water Management Awards – Platinum for Rakholi manufacturing facility



Grow Care India Sustainability & Water Management Awards – Gold for Dadra manufacturing unit



FSC Quality Excellence Awards for Environment Sustainability



Next Steps

In view of the progress made in FY19, we are even more determined to scale our impact using technology, innovation and the collaboration with our transformation enablers. In FY20, we not only look forward to reaching our goals for 2020, but framing more ambitious ones for the years to come – goals that will truly transform everyday living for our beneficiaries through digitally enhanced networks and interventions.



Annexure VI

Particulars of Energy Conservation, Technology Absorption and Foreign Exchange Earnings and Outgo required under the Companies (Accounts) Rules, 2014 for the year ended March 31, 2019.

A. Conservation of energy

1. The steps taken or impact on conservation of energy:

- a. Installation of LED lamps at service floor, optimisation of other lights & motion sensors for lighting lead to electricity consumption.
- b. Variable frequency drive in HVAC & optimisation of Chilled water network for chilled water operations are, generating a saving of approx. 1000 units per day.
- c. Installation of auto control to restrict the air loss.
- d. Installation of Air Boosters in buffering area to scrap and improved productivity with lower compressed air consumption.
- e. Replacement of all DC motors by AC motors for power saving.
- f. Installation of DG Synchronization Unit for optimisation of power consumption.
- g. Introduction of Condition based monitoring to reduce Breakdowns, improve productivity.
- h. Initiation of RCM (reliability centered maintenance) of Utility systems.
- i. Initiated Automation in DG sets electrical panels to reduce start up time during power failure.

2. The steps taken by the Company for utilising alternate sources of energy

- a. Preliminary feasibility study of adopting solar power initiated for Optic Fibre Plants.
- b. Initiated 300 KVA Roof top solar systems with auto cleaning of panels.
- c. Recycling and reuse of water in different processes in plants.
- d. Initiated procurement of High Recovery RO.
- e. Initiated SCADA for complete Utility to increase efficiency to rated level.
- f. Installation of transparent roof sheet in shop-floor for more to increase the illumination level & to reduce the usage of overhead lights in day time.

3. The capital investment on energy conservation equipment

- a. New high speed & advanced machines with multi product capability are procured to increase productivity with minimum scrap and which are capable of producing multiple products without increase in the energy consumptions.
- b. Replacing the Old DC motor with High efficiency AC Motor to improve to reduce the energy Consumption.
- c. It is planned to procure Solar panels of 300 KVA.

B. Technology Absorption

1. The efforts made towards technology absorption

- a. Bus coupler operations of the transformers, which are running in parallel, where enhanced with adoption of automatic changeover scheme at Power control center benefiting fault level reduction & safe operation.
- b. Replacing aged LT switchgears, adopted new technology of ABB- MNS design panels with benefits of drawing out feeders enabling quick changeovers.
- c. Reduced losses in water recycling capacity of treated water from Multi Effect Evaporator-MEE Unit (ETP) by adopting cold weld technology of Belzona for leakage arresting.
- d. Adoption of Steam Boilers with LNG fuel technology instead of Furnace oil boiler & replaced hydrogen with LNG in the production machines.
- e. Replacing HVAC old AHUs, adopted new direct drive technology in AHU's reducing the net power consumption.
- f. Initiation of Automation in Environmental chambers to utilise with Coil coolers.
- g. Installation of centralised SCADA system for Utility section.
- h. Barcode job card automation for Bobbin tracking systems for buffering.
- i. Temperature based cooling tower control is initiated.
- j. Improved line speed in Buffering from 600 to 750 mpm.

Directors' Report contd.

- k. Installation of closed loop heat exchanger system to reduce chilled water losses.
- l. Initiation of Diesel consumption optimisation by use of dual trigger APFC relay for reactive power compensation during DG set operation.
- m. Initiated implementation of ECO mode in UPS system through parallel operation of UPS to reduce power consumption by 12.5 lakhs units per year.

2. The benefits derived like product improvement, cost reduction, product development or import substitution

- a. Our primary product 652D fiber scrap reduced from 14% to 10% resulting in additional volume and reduction in product cost.
- b. In house fluorination to substitute Import of Flourine doped tube for our New product G 657A2 for Europe market. This project may completely substitute high value Fluorine doped tube imports in future.
- c. In-house cladding for G657 A2 to substitute high cost Rod In Cylinder (RIC) collapsed preform and Shinitsu made preform. This project will replace costly G657 A2 glass purchase to cater to demand upto 15 mn per annum.
- d. New Product G 657A2 scaled up to 10 Mn run rate enabling presence of approximate 40% in FTTH France market. Total road map available upto 30 Mn scale up as per market need.
- e. Designed and built take up and preform feed in-house with additional features and integrated with the existing towers.
- f. Upgraded control system to Programmable Logic Control system, designed and executed by Indian partner instead of importing new machines.
- g. Successful trial taken to manufacture G657 A2 under 200 microns diameter to help our cable plants to launch new products by increasing the fiber count in the available cable space.

Product Development

At Optic Fiber Cables (OFC), below new products were developed:

TruRibbon –“Highest fiber density in the most compact cable package “The patented technology of our Revolutionary TruRibbon Cables makes the

individual ribbons very flexible, easy to strip and handle, thus enabling first-time-right splicing.

Rugged-micro duct_432F - for Dual purpose Blow/Pull for Trunk fiberisation.

Next Gen Micro cable _576F (24F*(9+15)LT) - Microcable with improved duct to cable fill ratio and right-of-way utilisation. This design utilises re-Engineered buffer tube material for optimum cable packing efficiency. Our cable can easily be blown into microducts of 13mm and above.

72F NextGen Micro Overblowing - 72F overblow cable boosts network capability without much CapEx investment and this cable deploys nearly 500 m. cable in 15 minutes.

NextGen Microcable_432F (24F*(6+12)LT) - Our Patented product provides maximum fibres in a Microcable with improved duct to cable fill ratio and right-of-way utilisation. This design utilises re-engineered buffer tube material for optimum cable packing efficiency. Our cable can easily blown into microducts of 10mm and above.

Construction Products Regulations (CPR) certification – Successfully conducted Product testing and Factory Production Control audit at our Silvassa vicinity for OFC and speciality cable divisions.

Flexi Armor Cable - “Fast and Efficient underground network rollout” , Scalable cable design enabling lesser time to market with a 25% Lighter Ease of Handling & Improved Blowing efficiency of 16% Reduced Diameter as compared with conventional armor cable.

48F Indicum cable - Successful field trials in aerial installation by LGI.

Re-invented ADSS cable with GRY - Suitable for span lengths of 80 meter which can comply stringent tests like 1mn Galloping test and 10mn Aeolian vibration test.

Simulation capabilities for optical fiber cables - OFC plant added significant value for the Indian cable industry by incorporating engineering simulations into cable research programs. Adding this capability into the hands of optical fiber cable researchers would results in developing world class optical fiber cables in India. OFC plant started utilising this ability for new cable development.

Optic Fiber

Keeping the customer centric approach and address the fueling demand for TruRibbon and Microcable Sterlite®

developed the two next generation reduced diameter optical fiber product which is compliant to ITU 657A2 and ITU G.657A1/D. Next generation MICRO BOW-LIT(E) Single Mode Optical Fiber is a reduced coating diameter with ultralow bend sensitivity. Sterlite® MICRO BOW-LITETM (E) is ideal for market requirement of Access and Fiber To The Home (FTTH) applications particularly in-building use and in cables with high fiber counts and lower diameter micro cable and TruRibbon. Sterlite next generation reduced diameter product enables optical fiber cable designer to go for high density, reduced diameter TruRibbon and Microcable.

3. In case of imported technology (imported during the last three years reckoned from the beginning of the financial year) – Not Applicable

- a. The details of technology imported
- b. The year of import
- c. Whether the technology been fully absorbed
- d. If not fully absorbed, areas where absorption has not taken place, and the reasons thereof

4. The expenditure incurred on Research and Development (₹ crores)

- a. Capital – 12.94
- b. Recurring – 34.98
- c. Total – 47.92
- d. Total R&D expenditure as a % of total turnover – 1%

C. Foreign Exchange Earnings and Outgo

Discussion on activities relating to development of exports is covered in the Management Discussion & Analysis Report.

Foreign Exchange Actual Inflow: ₹ 1,510.10 crores

Foreign Exchange Actual Outflow: ₹ 1,582.72 crores

D. Environment and Sustainability

Project Zero waste to landfill

As part of Zero waste to landfill initiative, OFC – Rakholi unit has achieved an incredible feat by obtaining “Zero waste to landfill” certification by Intertek. On achieving the same STL OFC – Rakholi unit is the first in India among optical fibre manufacturing facility and one of very few industry in the world to get certified. The OFC – Rakholi unit divert nearly 99.5% of waste away from landfill/incineration however, the primary focus of the company is a reduction of waste at source.

Annexure VII

1) A brief outline of the Company's CSR Policy, including overview of projects or programs proposed to be undertaken and a reference to the web-link to the CSR policy and projects or programs.

Transforming Everyday Living, by Delivering Smarter Networks is how STL envisions enabling a connected future for India that is inclusive for all. The Company has warranted this by ensuring that Connectivity, Innovation and Sustainability are not just fundamental to how it operates as a business, but also incorporated into every effort to 'Create Shared Value'.

STL's CSR and Sustainability focus areas, realigned in 2017 - Education, Women Empowerment, Health and Environment are interconnected and power each other through their alignment with the UN Sustainable Development Goals and Ten Principles of the UN Global Compact Network. This, in addition to strategic partnerships with the Government of India, NGOs, technical institutions and other development players allows STL to create holistic solutions that positively impact and contribute to the realisation of integrated development for rural, semi-urban and urban areas in India.

The Company's updated CSR Policy, including an overview of projects or programs proposed to be undertaken can be viewed on the link mentioned below:

https://www.sterlitech.com/pdf/coc/18_jan_CSR_Policy_approved_by_the_Board_of_Directors.html

2) The Composition of the Sustainability and Corporate Social Responsibility Committee (CSR Committee)

- Mr. Arun Todarwal (Independent Director)
- Mr. A. R. Narayanaswamy (Independent Director)
- Mr. Pravin Agarwal
- Dr. Anand Agarwal

3) Average net profit of the Company for last three financial years: ₹ 268.60 crores.

4) Prescribed CSR Expenditure (two per cent of the amount as in item 3 above):

The Company is required to spend 2% of last three years' average net profit – ₹ 5.37 crores

5) Details of CSR spent during the financial year –

- Total amount to be spent for FY19: ₹ 5.37 crores
- Amount unspent, if any – Nil
- Amount Actually spent on CSR: ₹ 5.48 crores**
- Manner in which the amount spent during the financial year is detailed below –**

(₹ In lakhs)

1	2	3	4	5	6	7	8
Sl. No.	CSR project or Activity Identified	Sector	Location	Amount outlay (budget), project or program wise (lakhs)	Amount spent on the projects (lakhs)	Cumulative expenditure upto the reporting period (lakhs)	Amount spent: Direct or through implementing agency*
1	Jeewan Jyoti Women Empowerment Institution - Vocational training and holistic development program for women from rural communities	Education, Women Empowerment	Pune	157.00	193.90	661.37	Direct
	Jeewan Jyoti Ved Vidyalaya - Preservation of heritage language	Education	Pune	41.00	50.00	89.13	Direct
	Educational Scholarships and donations	Education, Health	Multiple locations	13.00	13.00	13.00	Direct

(₹ In lakhs)

1	2	3	4	5	6	7	8
Sl. No.	CSR project or Activity Identified	Sector	Location	Amount outlay (budget), project or program wise (lakhs)	Amount spent on the projects (lakhs)	Cumulative expenditure upto the reporting period (lakhs)	Amount spent: Direct or through implementing agency*
2	Virtual Classroom Project - Technology based quality education program for underprivileged children from urban slums, in PPP with Municipal Corporation of Greater Mumbai (MCGM)	Education	Mumbai	76.00	72.00	269.28	Direct
	Pragyan - Technology based quality education program for underprivileged children combined with training for the teachers.	Education	Jaipur	64.00	70.00	70.00	Direct
3	Green Belt - Plan sustainable green zone development, etc.	Environment	Aurangabad	30.00	18.00	23.47	Direct
4	Mobile Medical Unit - Enabling access to preventative and curative healthcare services across tribal communities in Diu, Daman, Dadra, Silvassa area	Health	Silvassa	24.00	13.50	82.89	In-direct
5	Smart Nandghars - Redeveloping existing government Anganwadis at Silvassa and equipping them with a setup at par with private play schools.	Education	Silvassa	58.00	57.00	57.00	Direct
6	Educational Scholarships and donations	Education	Silvassa	22.00	12.50	53.84	Direct
7	Community service	Education, Women Empowerment, Environment	Multiple locations	23.00	6.00	6.00	Direct+ Indirect
8	Disaster Relief	-	-	-	16.00	16.00	Direct
9	Social Enterprise Incubation - Education and Healthcare interventions	Education, Health, Community Development	Multiple locations	2.00	2.60	14.00	Indirect
10	Administration and Management	Admin	Multiple locations	27.00	23.50	54.16	Direct + Indirect
TOTAL				537.00	548.00	1,410.14	

*Details of implementing agencies: Sterlite Tech Foundation (Pune), Jnana Prabodhini (Pune), Tilak Maharashtra Vidyapeeth (Pune), Maharshi Ved Vyas Pratishthan (Pune), MCGM (Mumbai), Reniscience (Mumbai), UnLtd India (Mumbai), SSR Memorial Foundation (Silvassa), Indian Red Cross Society (Silvassa), UT Administration (Silvassa, D&NH)

Note:- CSR activities have been carried out either through Sterlite Tech Foundation (Public Charitable Trust with 3 years track record) or directly by the Company through administrative support of several Implementing Agencies as mentioned above and other Non-Governmental Organisations or Charitable Institutions.

6) In case the Company has failed to spend the two per cent of the average net profit of the last three financial years or any part thereof, the Company shall provide the reasons for not spending the amount in its Board report. – Not Applicable

7) CSR committee responsibility statement

CSR Committee confirms that the implementation and monitoring of CSR activities is in compliance with CSR objectives and policy of the Company.

Date: April 23, 2019
Place: Pune

Anand Agarwal
CEO & Whole Time Director

Arun Tadarwal
Chairman - CSR Committee

Business Responsibility Report

Introduction

Aspiration of creating shared value, conducting our business activities in an environmentally and socially responsible manner while making a positive contribution to India's economic growth have been business drivers for Sterlite Technologies Limited (STL) since inception. The principles of sustainable development and alignment to triple bottom line of sustainability have always been at the core of our business strategy and ingrained in our business activities and stakeholder interactions.

This Business Responsibility Report chronicles our actions in the domain of sustainable development in FY 2018-19. Aligning with the guidelines set forth by Securities and Exchange Board of India (SEBI), this report presents the commitment of the organisation to the principles as laid out in the 'National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business' issued by the Ministry of Corporate Affairs.

Section A: General Information about the Company

1. Corporate Identity Number (CIN) of the Company	: L31300MH2000PLC269261
2. Name of the Company	: STERLITE TECHNOLOGIES LTD.
3. Registered address	: E1, MIDC Industrial Area Waluj, Aurangabad, MH 431136
4. Website	: www.sterlitetech.com
5. E-mail id	: communications@sterlite.com
6. Financial year reported	: 2018-19
7. Sector(s) that the Company is engaged in (industrial activity code-wise)	
Product/ Service	NIC Code
Fibre Optical Cable	3890
Optical Fibre	3890
Copper Telecom Cables	3130
Fibre Optical Cable Laying Services	3890
8. List three key products/services that the Company manufactures/provides (as in balance sheet)	a. Connectivity Solutions b. Network Services c. Network Software
9. Total number of locations where business activity is undertaken by the Company	
(a) Number of international locations (Provide details of major five)	
i. International	
1. Italy - 1	
2. China - 2	
3. Brazil - 1	
4. UK - 1	
(b) Number of national locations	
i. National Locations	
1. Maharashtra - 4	
2. UT of D&NH - 2	
3. Gujarat - 1	
4. Haryana - 1	
5. Karnataka - 1	
10. Markets served by the Company – Local/State/National/International	
With expertise ranging from optical fibre and cables, hyper-scale network design, and deployment and network software, STL is the industry's leading integrated solutions provider for global data networks. We partner with global and national telecom companies, cloud companies, citizen networks and large public enterprises to design, build and manage such cloud-native software-defined networks.	

Section B: Financial Details of the Company

1. Paid-up capital (₹)	:	80.51 crores
2. Total turnover (₹)	:	4,862.63 crores
3. Total profit after taxes (₹)	:	535.23 crores
4. Total spending on corporate social responsibility (CSR) as percentage of profit after tax (%)	:	2.04
5. List of activities in which expenditure in above four have been incurred		
a. Jeewan Jyoti Women Empowerment Programme: A programme for women empowerment in rural areas that imparts vocational training, along with placement support.		
b. Virtual Classrooms (Sterlite School Tech): A technology-based quality education programme for underprivileged school-going children of urban slums. This project is a joint initiative of Sterlite Tech Foundation and Mumbai Corporation of Greater Mumbai.		
c. Mobile Medical Unit (MMU): Operating a mobile health van equipped with necessary healthcare facilities with onboard doctors and nurses. The MMU has been instrumental in providing basic healthcare services in rural areas, creating health awareness, encouraging preventive care and addressing local health issues.		
d. Project Jaldoot: Initiatives targeting the water scarce regions in the vicinity of Aurangabad by enhancing water harvesting capacity of existing storage structures, watershed development activities and educating villagers in good irrigation practices.		
e. Project Greenbelt: With the intention of alleviating the effects of climate change caused by industrialisation in Aurangabad, STL proactively initiated Project Greenbelt. The programme has ensured that the approach road to MIDC, Waluj (Aurangabad) is lush green and pollution-free.		

Section C: Other Details

1. Does the Company have any subsidiary company/companies?	:	Yes
2. Do the subsidiary company/companies participate in the BR initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s)	:	Yes, three (3) subsidiaries (Indian)
3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? (Less than 30%, 30-60%, More than 60%):		
We offer end-to-end solutions to our customers and guide them on best practices and sustainable approaches during the laying of optical fibre cables, as well as over the course of the life of our products. Hence, by partnering with our esteemed customers, we have been able to further extend the reach of our initiatives. Overall, 30% of our customers are part of our BR initiatives. We are also increasing our efforts to extend our sustainable development commitment across the supply chain and collaborating with our suppliers.		

Section D: BR Information**1. Details of Director/Directors responsible for BR****(a) Details of the Director/Director responsible for implementation of the BR policy/policies**

1. DIN Number	:	00057364
2. Name	:	Dr. Anand Agarwal
3. Designation	:	CEO & Whole-time Director

(b) Details of the BR Head

1. DIN Number (if applicable)	:	03040078
2. Name	:	Anupam Jindal
3. Designation	:	Chief Financial Officer
4. Telephone number	:	+91.20.30514000
5. E-mail id	:	anupam.jindal@sterlite.com

Business Responsibility Report contd.

2. Principle-wise (as per NVGs) BR Policy/policies

(a) Details of compliance (Reply in Y/N)

No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Principle Area	Code of Conduct	Product Responsibility	Employee Wellbeing	Stakeholder Engagement	Human Rights	Environment	Public Advocacy	CSR	Customer Value
1	Do you have a policy/policies for...?	Y	Y	Y	Y	Y	Y	Y	Y	Y
2	Has the policy being formulated in consultation with the relevant stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
3	Does the policy conform to any national/international standards? If yes, specify? (50 words) ¹	Y	Y	Y	Y	Y	Y	Y	Y	Y
4	Has the policy been approved by the Board? If yes, has it been signed by MD/owner/CEO/appropriate Board Director?	Y	Y	N	Y	Y	Y	Y	Y	Y
5	Does the Company have specified committee of the Board/Director/Official to oversee implementation of policy/policies?	Y	Y	Y	Y	Y	Y	Y	Y	Y
6	Indicate the link for the policy to be viewed online	Code of Conduct ²	Internal	Internal	Internal	Internal	Internal	Internal	CSR Policy ³	Internal
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
8	Does the Company have in-house structure to implement the policy/ policies?	Y	Y	Y	Y	Y	Y	Y	Y	Y
9	Does the Company have a grievance redressal mechanism related to the policy/policies to address stakeholders' grievances related to the policy/policies?	Y	Y	Y	Y	Y	Y	Y	Y	Y
10	Has the Company carried out independent audit/evaluation of the working of the policy/policies by an internal or external agency?	Y	Y	Y	N	N	Y	N	Y	Y

¹Based on National Laws and Regulatory Frameworks

²www.sterlitetech.com/pdf/coc/Code-of-conduct-24-page.pdf

³www.sterlitetech.com/pdf/coc/CSR-Policy-STL.pdf

(b) If answer to the question at serial number 1 against any principle, is 'No', please explain why: (Tick up to two options)

No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	The Company has not understood the principles									
2	The Company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles									
3	The Company does not have financial or manpower resources available for the task									
4	It is planned to be done within the next six months									
5	It is planned to be done within the next one year									
6	Any other reason (please specify)									

3. Governance related to BR

- (a) **Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company (within three months, three to six months, annually, more than one year)**

The Board of Directors meet on a quarterly basis while the Sustainability Council, which is responsible for reviewing the BR performance, meets on monthly basis.

- (b) **Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently is it published?**

We publish the Business Responsibility Report annually as part of our Annual Report. The first one was published for FY 2016-17. Additionally, we published the first sustainability report for FY 2017-18, which has been prepared as per globally accepted GRI sustainability reporting standards.

Section E: Principle-Wise Performance**Principle 1****Business should conduct and govern themselves with ethics, transparency and accountability**

Uncompromising business ethics are an integral part of our values and it has always been our vision to live up to the highest standards while upholding integrity in every business transaction. We believe that ethical and economic values are interdependent and business communities must always strive to operate in compliance to the accepted global norms.

Our commitment towards ensuring that we conduct business and governance in a transparent and accountable manner is evident through our comprehensive set of policies such as the Code of Conduct and Ethics, Whistleblower and the Supply Chain Management policies. Each of these is an extension of our values and principles and provide the guidance required for managing business activities while maintaining utmost integrity.

- 1. Does the policy relating to ethics, bribery and corruption cover only the Company? Does it extend to the Group/joint ventures/suppliers/contractors/NGOs/others?**

Our Code of Conduct and Ethics policy applies to employees of STL and its subsidiaries.

Our Whistleblower policy applies to all employees of STL, its subsidiaries and all external stakeholders. Additionally, our supply chain partners are covered as part of the Supply Chain Management policy, which includes the principles on conducting business

transactions with high level of ethics, transparency and integrity.

- 2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.**

Details of the shareholder complaints are included in the Corporate Governance Report of the Annual Report under the section on Stakeholders' Relationship Committee.

Principle 2**Businesses should provide goods and services that are safe and contribute to sustainability**

STL is one of the few fully integrated optical fibre and cable manufacturers in the world. Our unique proposition of offering integrated solutions for clients enables us to proactively address sustainability challenges across the complete value chain.

Our actions are not only governed by the business perspective, but we also give due importance to the sustainability impacts of our operations, products and services. We have undertaken several initiatives in this regard, which have helped us reduce the impact of our products and services. We have initiated a comprehensive assessment of our manufacturing activities to evaluate the waste reduction opportunities.

- 1. List up to three of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.**

Sterlite Smart City Solution Suite: We offer comprehensive service solutions in the form of Sterlite Smart City Solution Suite, which is an end-to-end approach for fast and future-proof network rollout. It is a unique offering that features complete programme management, project execution and network integration from infrastructure management to network applications.

Smart City Solution: Our Smart City Solution has been carefully designed keeping in mind sustainability risks with efforts to minimise our environmental footprint and avoid any detrimental social impacts. It not only enables speedy and targeted delivery of services, but also brings citizens closer to the government by enabling smarter services to citizens, providing efficient ways to connect with government agencies, improving productivity, service quality, better governance resulting in overall increase in economic development.

Business Responsibility Report contd.

Enhanced safety through round-the-clock surveillance is another social benefit for citizens.

Life Cycle Assessment Study: Towards our endeavour of delivering world-class products and services while minimising the impact of our business activities on the environment and society, we have completed our first pilot Life Cycle Assessment Study for optical fibre cable. This study has helped us understand the environmental impacts of hotspots and will be instrumental in guiding our future product development. Thus, we aim to deeply embed sustainable practices in our products.

2. For each such product, provide the following details in respect of resource use (energy, water, raw material and others) per unit of product (optional):

Reducing resource consumption is the heart of the Manufacturing Excellence Strategy and we have inculcated a culture wherein each employee is encouraged to identify opportunities for resource conservation. We firmly believe that this not only brings cost savings but also helps in mitigating risks in a resource constrained world. By adopting the principle of 'first time right', we have set ourselves an ambitious goal of eliminating rework and waste, which will help us in conserving valuable resources.

Through collective efforts, we have been successful in bringing down our energy and water use at our manufacturing locations compared to the previous year. On top of that, we continue to recycle and reuse treated effluents back into our processes to reduce our dependence on freshwater.

(a) Reduction during sourcing/production/distribution achieved since the previous year throughout the value chain?

Business activities at STL are conducted with the firm objective of conserving precious resources. This is endeavored not only in the manufacturing, which happens at our facilities but also in upstream and downstream stages. We thus ensure that we can mitigate environmental impact that goes beyond the physical boundaries of our operations. Our first life cycle assessment study has been undertaken with the aim of scientifically quantifying these impacts and preparing a roadmap with measurable goals towards their reduction. This study is helping us understand environmental footprint from lifecycle perspective and evaluate opportunities across the value chain.

We are actively adopting principles of circular economy in our sourcing decisions. For example, we are reusing plastic spools several times by passing them from our one manufacturing unit to another, thereby extending their life. During the year, we have also successfully

piloted replacing corrugated boxes with polypropylene boxes. These boxes are reused among our facilities like the spools. We now plan to replicate these learnings towards elimination of requirements for fresh packaging materials to a large extent.

We dispatch our cables to customers on large wooden drums, as well as pallets. We have been able to identify the opportunity to refurbish wooden drums and pallets in-house, which has helped us significantly reduce the requirement for fresh wood thus leading to conservation of natural resources.

(b) Reduction during usage by consumers (energy, water) has been achieved since the previous year?

Our products inherently do not consume any energy or water during their use. However, as is case with optical fibers, there are losses associated with it resulting in weakening of signals. These losses increase even more if there are several bends in the system. It has been our effort to develop cables with reduced losses thus leading to better efficiency while the cable is in use. This not only improves the overall signal quality but also results in significant savings in terms of energy requirements by our customers.

3. Does the Company have procedures in place for sustainable sourcing (including transportation)?

(a) If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.

Our Supply Chain Management policy has been enacted to facilitate development of suppliers as long-term business partners. With such partners, we work closely on not only business focus areas, but also on sustainable development. We are continuously working with our suppliers towards identifying and addressing existing issues to achieve a sustainable supply chain.

Our vendor selection criteria gives due importance to the environmental and societal performance aspects and we regularly monitor our vendors to ensure that our suppliers are also operating according to the principles of sustainable development. We have started collecting data on sustainability credentials of our suppliers. This is in addition to mandatory engagement on regulatory requirements such as those related to REACH and RoHS. We regularly review the restricted substances list and connect with our suppliers to make sure that our sourcing database is up to date.

4. Has the Company undertaken any steps to procure goods and services from local and small producers, including communities surrounding their place of work?

Driven by our vision of creating shared value for society while achieving success in business activities, we believe it is important to ensure that our operations should lead to prosperity for community members. As a result, we have made steady progress towards developing local vendor base and have assisted several suppliers in expanding their operations closer to our manufacturing facilities. In fact, as part of our responsible corporate citizenship commitment, all non-critical materials such as packaging, machine spares, job work and others are preferably procured from local vendors. We collaborate with these vendors to improve their skills and ensure that they meet our stringent requirements thus leading to a win-win partnership. We have observed that such vendors benefit immensely from these opportunities and several have been able to scale rapidly.

(a) If yes, what steps have been taken to improve the capacity and capability of local and small vendors?

As part of our capacity building programmes, we have engaged and developed local partners in Silvassa to produce and supply high-quality FRP and wooden drums. At Waluj and Shendra, we have a partner audit programme, which gives vendors useful inputs on improvement in quality, capability and other parameters.

5. Does the Company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.

Recycling and reuse of solid waste has been a top priority for us. This is reflected in our vision of diverting 100% waste away from landfill. During the past year, our optical fibre cable manufacturing unit in Rakholi has

been certified for successfully diverting more than 99% waste from landfill by effective recycling and reuse. Further, we are diverting close to 95% waste generated from facilities in India away from landfill.

Principle 3

Businesses should promote the wellbeing of all employees

To create and nurture a positive work environment where employees can excel professionally and lead an overall healthy lifestyle has always been among the core objectives of STL. This has been achieved through a mix of progressive policies and active engagement with employees on a regular basis to hear their feedback and help them grow. At STL, employee wellbeing has always been accorded paramount importance and our human resource strategy has been centered on this. Our commitments towards helping build a professionally rewarding career for our employees include:

- Providing and maintaining absolute transparency and equality during all stages of recruitment and employment, which discourages discrimination on any grounds
- Promoting wellbeing of employees by helping them achieve work-life balance and providing necessary facilities to them, including those with special needs
- Assisting the employees to move up the professional ladder and ensure availability of continual training and skill-upgradation opportunities and promote employee morale and career development
- Enabling a safe workplace free from all sorts of harassment and providing all required means and measures to ensure access to grievance redressal mechanism

1. Please indicate the total number of employees	2,990
2. Please indicate the total number of employees hired on temporary/contractual/casual basis	2,637
3. Please indicate the number of permanent women employees	472
4. Please indicate the number of permanent employees with disabilities	3
5. Do you have an employee association that is recognised by the management?	Yes, in Italy
6. What percentage of your permanent employees holds membership of this recognised employee association?	125 out of 2,990 (4%)
7. Please indicate the number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.	

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No.	Category	No. of complaints filed during the financial year	No. of complaints pending as on end of the financial year
1	Child labour/forced labour/involuntary labour	0	0
2	Sexual harassment	0	0
3	Discriminatory employment	0	0
8. What percentage of your under-mentioned employees were given safety and skill up-gradation training in the last year?			
(a)	Permanent Employees	Safety Training for 100% employees and skill upgradation for 60% of our people	
(b)	Permanent Women Employees	Safety training for 100% women employees and skill upgradation for 63% our female teammates	
(c)	Casual/Temporary/Contractual Employees	Safety training for 100% employees with disabilities and skill upgradation for 15% (w.r.t the software B.U) of them.	
(d)	Employees with Disabilities	Safety training for 100% employees and skill upgradation for 50% (we have 2 eligible employees)	

Principle 4

Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalised.

1. Has the Company mapped its internal and external stakeholders?

We seek to constructively engage with all stakeholder groups, both internal as well as external, with an intent to create shared value. We have always adopted a proactive approach for reaching out to the stakeholders for gauging their perception, needs and expectations. This understanding has helped us to design interventions, which align with our business goals while bringing about a positive impact in the lives of people.

We recognise our stakeholders as any person or groups who are affected by our business activities and/or have a potential or actual impact on our business by the way of their presence in the vicinity of our operations or by the way of their perceptions and opinions. Over the years, we have identified and prioritised stakeholders by understanding their influencing ability and interest level. This has allowed us to map stakeholders effectively and come up with engagement strategies.

2. Out of the above, has the Company identified the disadvantaged, vulnerable and marginalised stakeholders.

We actively engage with the communities in the vicinity of our operations and our objective has been to identify and work towards upliftment of those who are socially and financially disadvantaged.

3. Are there any special initiatives undertaken by the Company to engage with the disadvantaged, vulnerable and marginalised stakeholders? If so, provide details thereof, in about 50 words or so.

Near our manufacturing facility in Silvassa, we are working towards bringing the tribal communities from nearby villages into mainstream through proactive interventions. Realising the critical need of the rural tribal population in Dadra & Nagar Haveli for primary healthcare services, we initiated our Mobile Medical

Unit (MMU) programme. The MMU project is run in partnership with the Indian Red Cross Society. The programme has been providing free health checkups to 24 villages and has served more than two lakh patients till date. The project also includes preventive awareness programmes and monitoring of the challenges faced by the villagers.

The region of Marathwada where our Aurangabad facility is located has traditionally been drought prone due to scanty rainfall and unpredictable monsoons. Through our project 'Jaldoot', we have worked in the 13 worst affected villages to enhance the water storage capacity of existing structures and educate farmers on water conservation, use of irrigation and cropping patterns.

Jeewan Jyoti Women Empowerment Institute by Sterlite Tech Foundation operates to address issues like low literacy among women, social system that undermines women and underdeveloped education, social and economic infrastructure, among others in and around Ambavane through the institute's vocational courses, and personality and economic development programmes.

The details of these initiatives have been presented in the Annual Report on Corporate Social Responsibility as Annexure VI of the Directors' Report of the Annual Report.

Principle 5

Businesses should respect and promote human rights

Our commitment towards protecting and upholding human rights has been guided by principles propagated by United Nations Universal Declaration on Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We have enacted a policy on human rights, which draws from the abovementioned principles and applies to STL and its subsidiaries. Our approach towards human rights protection aligns to our fundamental commitment of conducting

business in an ethical manner while ensuring that we adhere to the labour laws in communities where we operate.

To further ensure that our commitment towards respecting and promoting human rights are in sync with global efforts, we have now become signatory to United Nations Global Compact. This gives us opportunity to derive motivation from the world's largest forum on corporate sustainability and seek guidance where necessary.

We also ensure that every employee has access to platforms to voice their concerns and grievances in an appropriate manner, which is duly recorded and taken up for resolution. Details of all such helpline and communication channels, along with our policy commitments have been effectively communicated to every employee at all our facilities. These are also displayed prominently at key locations such that everyone has access to the information.

1. Does the policy of the Company on human rights cover only the Company or is extend to the Group/joint ventures/suppliers/contractors/NGOs/others?

Our human rights policy is based on the principles of adherence to labour standards; ensuring health and safety for employees; recognition of freedom of association; zero tolerance for child and forced labour; promoting diversity and equal opportunities; ensuring absolute non-discrimination; and respecting and preserving culture and heritage of local communities. The policy applies to STL and our subsidiaries. We have taken steps towards implementation of these principles across our operations and value chain.

2. How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?

2.1 Stakeholder complaints related to human rights received in the financial year	NIL
2.2 Stakeholder complaints related to human rights pending from previous year	NIL
2.3 Stakeholder complaints related to human rights resolved in the financial year	NIL

Principle 6

Business should respect, protect and make efforts to restore the environment

Environmental excellence is evident from the commitment of top management through the Quality, Environment, Health and Safety (QEHS) policy, which has been implemented across all STL facilities. The policy stresses on minimising pollution at sources and conserving natural resources. We have inculcated a culture for environmental conservation at every level in the organisational structure. This has been achieved through effective sensitisation about the imminent need for protecting and restoring the environment while minimising the footprint of our activities. During March 2018,

we organised a mass tree plantation drive at Aurangabad led by STL employees, who actively volunteered towards the cause of planting over 1000 trees. We periodically organise such events with the objective of engaging employees on a larger scale as well as doing our bit towards conserving the environment.

1. Does the policy relate to Principle 6 cover only the Company or extends to the Group/joint ventures/suppliers/contractors/NGOs/others?

The QEHS policy is applicable to STL, as well as our subsidiaries.

2. Does the Company have strategies/initiatives to address global environmental issues such as climate change, global warming and others? If yes, please give hyperlink for webpage etc.

At STL, we have always focussed on protecting our environment and ensure that air, water and land around us remain undisturbed and pristine. We aim to achieve this by conducting business activities synergistically with our surroundings. Driven by this commitment, we have given high priority to waste management while looking for every opportunity to reuse and recycle our waste and by-products in line with the principles of circular economy.

In our effort to align our sustainability strategy with global sustainability issues, we have now become signatory to United Nations Global Compact (UNGC). By doing so, we have formally stated our commitment to work towards the 10 principles, including those on environment. We see our commitment to UNGC as a significant milestone in our sustainability journey and one which helps us in contributing to jointly address global sustainability and environmental issues.

We recognise the challenges faced by communities residing in water stressed regions around Aurangabad. Hence, we have collaborated with villagers and government agencies through Project Jaldoot. Through this initiative, we are rejuvenating local water bodies and increasing water literacy. This in turn has helped in spreading awareness on water conservation and its sustainable use, along with water harvesting; thus, mitigating the adverse impact due to climate change and global warming. Further details about the same are hosted on the website of the Company at www.sterlitetech.com/b_business

3. Does the Company identify and assess potential environmental risks?

Yes. We have established Sustainability Council, which is chaired by the CEO and meetings are held on periodic basis to review and assess the environmental risks facing the organisation, along with monitoring of various initiatives in progress. While sustainability has always been deeply ingrained in the organisational purpose at STL, the establishment of the Sustainability Council has been premised on the need for continually evaluating the sustainability risks faced by the

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organisation in the evolving business scenario.

As a result of growing customer awareness and ever stringent regulations coupled with the expanding market base of STL, we have put together a process to critically review the business strategy incorporating the potential effects of environmental risks in our operations.

4. **Does the Company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?**

Not Applicable

5. **Has the Company undertaken any other initiatives on clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page.**

We have established an Energy Management System in our manufacturing plants, which provides real-time analysis of power consumption. This has enabled us to tap on the potential of energy saving and keep monitoring the opportunities for optimising energy usage. Initiatives such as efficient air conditioners, power factor correction equipment, variable frequency drives and timers for various electrical fittings have led to significant savings in electricity consumption.

We are also actively considering adopting solar PV for meeting our non-process electricity consumption and have already incorporated Rainwater Harvesting (RWH) provisions in facility expansions, which have been completed recently. Apart from this, for our existing manufacturing locations, we have set up the infrastructure for collecting rainwater and using it for recharging the groundwater table.

6. **Are the emissions/waste generated by the Company within the permissible limits given by Central Pollution Control Board/State Pollution Control Board (CPCB/SPCB) for the financial year being reported?**

Yes

7. **Number of show cause/ legal notices received from Central Pollution Control Board/State Pollution Control Board (CPCB/SPCB), which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.**

As on the end of year, no show cause/legal notices are pending.

Principle 7

Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner

1. **Is your Company a member of any trade and chamber or association? If Yes, name only those major ones that your business deals with:**
- Federation of Indian Chamber of Commerce & Industry (FICCI)

- Cellular Operator Association of India (COAI)
- Associated Chambers of Commerce and Industry of India (ASSOCHAM)
- Telecom Equipment Export Promotion Council (TEPC)

2. **Have you advocated/lobbied through above associations for the advancement or improvement of public good? If yes, specify the broad areas (drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy Security, Water, Food Security, Sustainable Business Principles, others)**

Yes, we are actively advocating for greater good of the public. The business scenario is undergoing a transformation with the rapid technological shift. In such a scenario, we have voiced our opinion at various forums and industry associations for promoting development of policies and regulatory frameworks for meeting the demands of an economically surging nation like India while also ensuring competitive environment.

Principle 8

Businesses should support inclusive growth and equitable development

Our commitment has always been to demonstrate highest standards of corporate citizenship and as a result, our approach has been to proactively evaluate social and environmental factors that can potentially influence our business activities in the long term. Based on this, we have defined a strategy to effectively engage with the impacted stakeholder groups.

Our CSR focus encompasses environmental protection, resource repletion, health and empowerment through education, working in partnership with credible non-profit organisations on a wide spectrum of related projects.

We consciously partner with communities in the vicinity of our manufacturing facilities and those geographic regions, which fall under the radius of our influence. We work with a clear goal to give back to society in such a way that the needs of the weaker sections are met, and improvements made in the quality of their lives.

1. **Does the Company have specified programmes/ initiatives/projects in pursuit of the policy related to Principle 8? If yes, provide details thereof**

The details of our CSR initiatives are presented in the CSR report, which is included as Annexure VI to the Directors' Report.

2. **Are the programmes/projects undertaken through in-house team/own foundation/external NGO/ government structures/any other organisation?**

The CSR projects are undertaken by Sterlite Tech Foundation either directly or through an external NGO or government structures.

3. Has the Company conducted any impact assessment of the initiatives?

For all projects, key performance indicators (KPIs) at three levels are selected based on which a project is monitored either directly by the Company or in collaboration with the NGO we are working with or a third-party agency:

- Activity indicators, which show if we are on track to deliver the activities in our project plan
- Outcome indicators, which tell us if project activities are making a difference
- Impact indicators, which tell us the short- to medium-term impact resulting from project outcomes

These KPIs are tracked on a monthly basis by the CSR team or our NGO partners. The CSR team is closely associated with the monitoring and evaluation process and uses tools like physical verification (site visits), group discussions at the CSR location, surprise visits and other techniques. The CSR team internally manages online CSR reporting platform to ensure projects are delivering according to the plan by making data on KPIs available readily for analysis and course correction.

Our Virtual Classrooms project, which is a part of the Sterlite School Tech programme measures the impact of the intervention through assessments at the beginning and at the end of each year. Through such impact assessment, we determine the effectiveness of pedagogy, as well as the improvement in students' performance. Similarly, for our tree plantation efforts, we have setup a detailed monitoring framework, which helps us track growth of each tree planted and maintain progress on periodic basis.

4. What is the Company's direct contribution to community development projects (amount in INR and the details of the projects undertaken)?

Details of our expenditure incurred on CSR initiatives are presented in the CSR report, which is included as Annexure VI to the Directors' Report.

5. Has the Company undertaken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.

We conduct periodic reviews of all our CSR projects to determine the effectiveness of the initiatives. We also conduct an audit for our CSR projects, which is performed by an independent third-party agency and based on this the details are then reported in the Annual Report.

Our ultimate objective for each of our CSR interventions is to deliver shared value for society. Our concept of shared value rests on the belief that business value

creation and societal value creation go hand in hand and achieving business prosperity is not possible unless society benefits from the business value creation.

Principle 9

Businesses should engage with and provide value to their customers and consumers in a responsible manner

Being a customer-centric organisation, delivering products and solutions, which not only meet but exceed the clients' expectations has always been our prime objective. This has even been established through a robust QEHS policy, which aims at enhancing customer satisfaction through proactive understanding customers' changing requirements and global benchmarking. The policy also lays down our commitment to continually improve quality parameters, reduce total cost of the product, maximise recycling, reduce wastes, discharges and emission and prevent/minimise impact on population, thus creating further value for our customers.

1. What percentage of customer complaints/consumer cases are pending as on the end of financial year.

Of the total customer complaints/consumer cases open at the beginning of the year and filed during FY 2018-19, 29% complaints/cases are pending as on March 31, 2019.

2. Does the Company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks (additional information)

All our product labels are made in compliance with the local law and consumer requirements.

3. Is there any case filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.

There are no cases filed or pending against STL regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years.

4. Did your Company carry out any consumer survey/ consumer satisfaction trends?

We periodically reach out to our customers to understand their perceptions, as well as concerns through customer satisfaction (CSAT) surveys. We monitor the trends of such surveys and necessary interventions are made as required.



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