

ENVIRONMENTAL SOCIAL GOVERNANCE POLICY

Route Mobile Limited

POLICY EFFECTIVE FROM APRIL 29, 2021

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1. Preamble

Every business, is deeply intertwined with environmental, social, and governance (ESG) concerns. It makes sense, therefore, that a strong ESG proposition can create value. Environmental, Social, and Governance (ESG) has gained increasing attention over the past few years, with many institutional investors investing only in those companies that provide ESG performance reporting. Meeting Environmental, Social and Governance (ESG) criteria has become an important goal for organizations. Customers and market demands are placing increased pressure on corporations to engage in more sustainable business practice, and investors are increasingly using ESG criteria to evaluate the companies in which they might want to invest or do business with. Environmental, social, and governance (ESG) criteria create a framework for helping investors who want to incorporate personal values into their investment approach. The ESG screening process identifies companies that have built sound environmental practices, strong social responsibility tenets, and ethical governance initiatives into their corporate policies and everyday operations. Environmental criteria consider if a company operates with concern towards nature.

ESG processes and procedures focus on non-financial performance indicators that address a company's approach towards responsible investment, sustainability, its impact on society and the environment, as well as other ethical and corporate governance considerations.

Environmental

The depletion of natural resources and the threat of climate change have raised concerns about the environment and the potential financial impact on businesses. Sustainable options are increasingly being considered as part of investment choices. The issues are diverse but the main areas are:

- Factors contributing to climate change
- Efficient energy consumption
- Responsible disposal of hazardous waste
- Sustainability of resources
- The impact of climate change on businesses

Social

Inclusion, diversity and equality are becoming more important considerations in relation to the way in which businesses operate and can generate competitive advantage; with these areas attracting increasing scrutiny from a range of stakeholders. In particular, there are increasing commercial benefits for businesses which have inclusive and diverse work ethics and practices; and we look at the impact a company has on its employees, local communities and society. The main areas of consideration are:

- Preservation of human rights, and avoidance of any complicity in human rights abuses
- Equality and diversity amongst employees
- Non-discriminatory employment practices
- Ensuring there is no exploitation of child labour or indentured servitude
- Health and safety
- Animal welfare
- Corporate donations

Corporate Governance

Corporate governance covers the rights and responsibilities of the management of a company – its structures, corporate values and accountability processes. This relates to the following areas:

- Management structure
- power balance between the CEO and Board, separation of Chairman from CEO, appropriate checks and balances for members of the management team
- Employee relations and workplace grievances
- Executive remuneration
- Corporate Codes of Conduct

The ESG analysis is sought as a measure of responsible investing, and goes beyond the traditional method of using only financial factors for evaluation of an investment or potential investment. The Indian legislation has been trying to cover the various aspects of ESG in a fragmented manner. For instance, the board's report shall disclose the conservation of energy, technology absorption, etc. The aspects have to be dealt with in detail – the company shall disclose steps taken or impact on conservation of energy, steps taken to utilise alternate sources of energy, capital investment in energy conservation equipment, efforts towards technology absorption, etc. Besides, a director owes a fiduciary duty towards the community as well as for the protection of the environment. Also, CSR activities include various socio-economic activities, required to be disclosed separately in the annual report. However, the closest requirement is that of Business Responsibility Reports (BRR) which has been mandated from ESG perspective only. BRR or Business Responsibility Report can be said to be the foremost step in India in promoting non-financial reporting in India, on a mandatory basis. The Securities and Exchange Board of India (SEBI), in 2012, through its listing conditions mandated the top 100 listed entities by market capitalisation to file BRR from ESG perspective. This was extended to top 500 companies in FY 2015-16. The coverage has been extended to 1000 companies now. In the year 2020, MCA issued Report of the Committee on the Business Responsibility Reporting, and SEBI issued a Consultation Paper on the format for Business Responsibility and Sustainability Reporting (BRSR, suggesting that BRR shall be renamed as BRSR). Route Mobile accordingly shall include a section on BRR in its annual report of FY 2020-21.

The BRR is based on the 9 principles in line with the 'National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business' (NVG) issued by MCA. The guidelines state that the companies should not be just responsible but also socially, economically and environmentally responsible. Through such reporting, the guidelines expect that businesses will also develop a better understanding of the process of transformation that makes their operations more responsible. The NVG were further revised and the MCA formulated the 'National Guidelines on Responsible Business Conduct' (NGRBC). The said guidelines stipulated that the businesses should –

- conduct and govern themselves with integrity in a manner that is Ethical, Transparent and Accountable,
- provide goods and services in a manner that is sustainable and safe,
- respect and promote the well-being of all employees, including those in their value chains,
- respect the interests of and be responsive to all their stakeholders,
- respect and promote human rights,
- respect and make efforts to protect and restore the environment,

- when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent,
- promote inclusive growth and equitable development, and
- engage with and provide value to their consumers in a responsible manner.

The ongoing climate change crisis, green initiatives, data security and recent global pandemic have indubitably propelled companies to consider Environmental, Social, and Governance (ESG) factors in their mainstream operations. The stakeholders are becoming more and more conscious about non-financial factors such as -Environmental, Social, and Governance (ESG) as part of their business decision process. ESG factors are starting to play a significant role in identifying material risks, long-term investments, and growth opportunities.

2. Purpose

The purpose of this policy is to (i) define Route Mobile's position regarding ESG and (ii) provide our employees with guidelines related to ESG for our decision-making processes. The policy will also be used as a tool to communicate to clients and stakeholders how Route Mobile integrates ESG considerations into business decision-making processes across all service and product offerings.

As India's one of the leading omni-channel communication company, we are committed to positively impact the environment, our customers, employees, and the community at large. At RML, ESG initiatives and principles will be aligned to our CSR initiatives which would complement with our strategic goals in terms of services we seek to offer all our stakeholders. The ESG policy framework will serve as a guiding document for all CSR initiatives and other operational activities undertaken by us and will be integrated to the operations of our subsidiaries and associates across the globes.

3. Core Areas

Energy & Emissions

In our strategy to combat climate change and transitioning to a low carbon economy, we will strive to reduce our carbon footprint by taking on initiatives to monitor and reduce our energy consumption by incorporating energy efficient building designs where applicable, implementing automated energy management solutions to reduce energy consumption and by reducing server rack space, using Lithium ion batteries in UPS devices and use ozone friendly refrigerants for cooling etc., as may be practicable and wherever possible.

Waste

The Company shall make efforts to dispose waste in the most responsible manner. Electronic waste generated by the Company will continue to be disposed through authorized personnel. The Company will ensure that no hazardous electronic waste is sent from the Company to the landfill. The Company is conscious of paper usage in its operations, transactions and customer communications. Our push to go digital across service and product lines will continue to reduce paper consumption, thereby reducing paper waste. Printing and photocopying operations by employees across large offices will also continue to be monitored and regulated in order to reduce wastage of paper. The Company will strive to reduce the use of all forms of plastic in its offices, branches as well as in its promotional, marketing and outreach events.

Procurement Practices

The Company recognizes the need to work closely with our suppliers to reduce waste, improve efficiency, reduce carbon footprint and engage with them to understand their commitment towards human rights and labour practices. We will thus continue to work towards greater integration of environmental & social considerations in our procurement practices.

Our Customers

We recognize that maintaining the trust and regard of our customers is important for our success and longevity, in a fiercely competitive market. Through our digital platforms and initiatives, we will provide our customers, the flexibility to access and consume our Companying services over any digital platform of their choice. The Company will also undertake initiatives to combat cybercrime and data theft by means of a comprehensive mechanism of information and data security.

Community & Society

Guided by our board governed Corporate Social Responsibility (CSR) policy, the Company will continue to create value for marginalized communities in the country, through well-structured programs and interventions. Our CSR programmes focus on 3 distinct areas of intervention namely: Promotion of Education, Healthcare & Hygiene and Sports for young children.

4. ISO Certifications

The Company has ISO Certification upholding the highest standards of integrity and independence viz. ISO 9001:2015 Quality Management Systems (QMS) and ISO/IEC 27001:2013 Information Security Management System (ISMS).

5. Our Workforce & Employment Practices

Non-Discrimination & Fair Treatment

Our employees are central to everything we do and satisfaction of our employees is critical to the long term success of the Company. We will provide fair and equal employment and advancement opportunities to all its employees and there will be no discrimination on the basis of race, caste, color, age, sex, disability and socio-economic status of the candidate.

Remuneration and career progression.

The Company will continue to create an inclusive culture to ensure representation across gender, caste, creed, religion, region, physical ability and military/ veteran status.

Employee Health & Well-being

The Company is committed to continue to take steps to promote a safe and conducive work environment for its employees and will provide guidance on occupational health and safety, appropriate healthcare benefits and medical cover to all its employees.

Women Safety

The Company has a Zero tolerance Policy on Prevention of Sexual Harassment and an Internal Complaints Committee (ICC) that investigates cases of sexual misconduct and investigates them through a fair and transparent process and take action against erring employees.

6. Administration of Policy

Route Mobile's CSR Committee shall oversee this policy and shall have the authority to make any interpretations regarding the operation of this Policy.