PAVING THE WAY FOR A
SUSTAINABLE FUTURE

SUSTAINABILITY REPORT **2020**
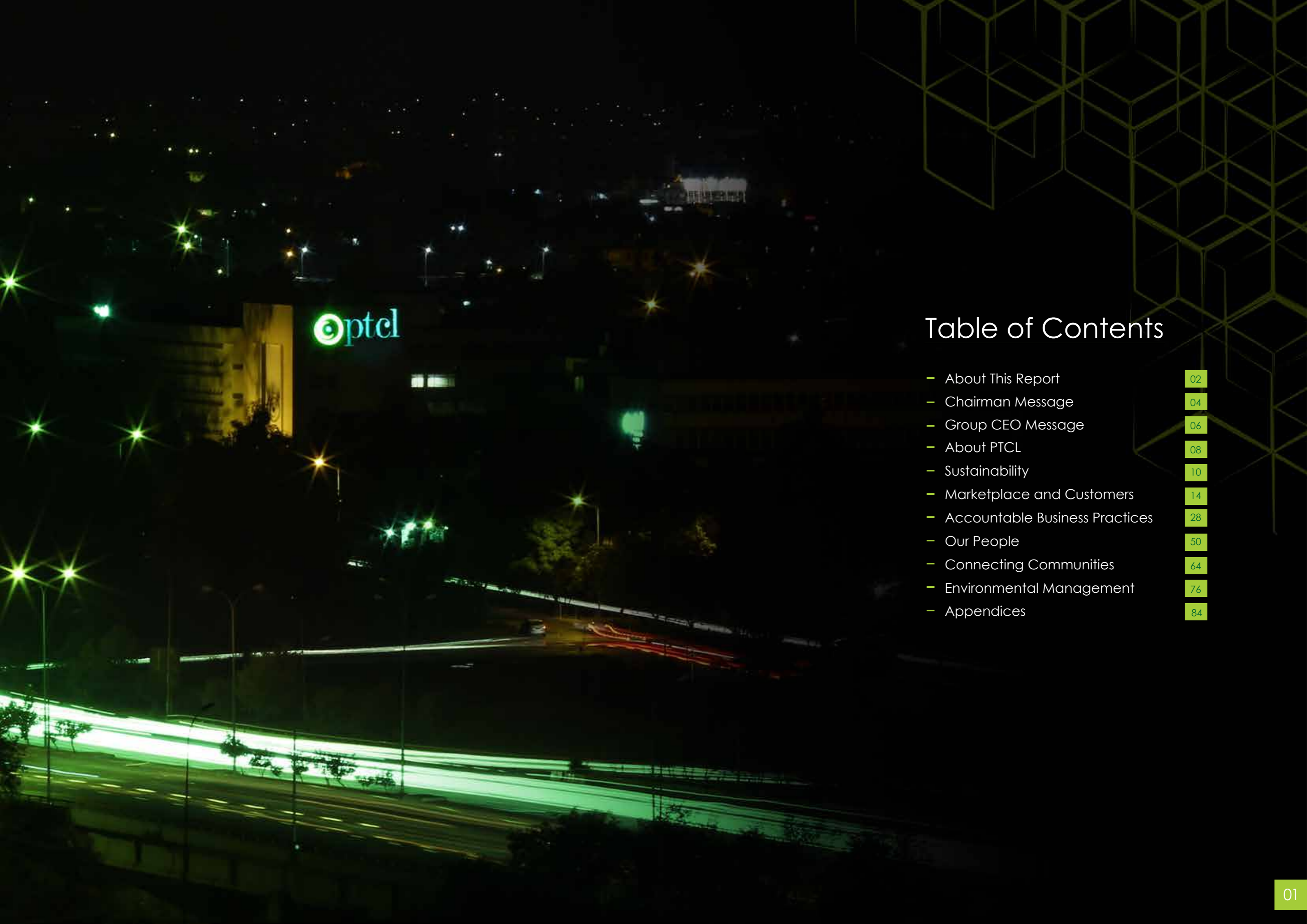
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Table of Contents

About This Report

Welcome to the sustainability report encompassing Pakistan Telecommunication Company Limited's (PTCL) operations for the calendar year 2020. This report demonstrates PTCL's commitment to sustainable development and highlights our economic, environmental, and social performance.

This report has been prepared in accordance with the GRI Standards: Core option. We report on the topics that are most material to our business and stakeholder groups. It has successfully completed the GRI's Materiality Disclosure Service. To view the GRI content index, please refer to Appendix B. We welcome your feedback on this report and our performance. Feel free to email us at: sustainability@ptcl.net.pk

Chairman
Message

"In the midst of every crisis, lies great opportunity" (Albert Einstein). The COVID-19 pandemic was no exception; besides its devastating effects on society and the economy, it unfolded a wide array of opportunities and opened new avenues for the telecom industry. In such a landscape, digitalization emerged to be a necessity, rather than a choice, for sustainability.

The pandemic not only restricted social activities but also adversely affected the economic growth of the country. During these crises, the emergence of digitalization reshaped and transformed industries to develop modern ways of doing business besides supporting society in building the resilience to survive. Consequently, the vibrant telecom sector emerged as a prominent contributor to the country's economy and played a pivotal role in ensuring the availability of essential services to the community.

PTCL Sustainability Report 2020 will showcase Company's performance, its capacity of being a catalyst for other sectors, its role in building the resilience of communities, and its pursuance for sustainable business growth. During these trying times, telecom technologies and smart work practices appeared as saviours providing impetus for strong collaborations between telecommunications and other sectors viz. education, health, security, and commerce.

PTCL, being the national carrier of Pakistan, is well-positioned to act as a catalyst to support the vision of Digital Pakistan. As a connectivity enabler, PTCL has played a major role in ensuring the data uptake and digitalization efforts of its customers by fulfilling their high-speed connectivity and data needs. Cognizant of the contemporary challenges and tough competition, we have taken timely decisions to expand and modernize Company's network with innovative technologies and smart solutions in a synchronized manner. PTCL remained focused to ensure the provision of seamless connectivity & services and has taken unparalleled customer-centric initiatives to enable and enrich all service verticals with state-of-the-art customer experience management platforms. PTCL has successfully maintained its dominant position in the market with reference to Data Center, ICT, IP bandwidth, and managed capacity services.

PTCL Group's performance for the year 2020 has demonstrated the Group's ability to sustain and pave way for an accelerated growth trajectory in the coming years. During the year, the top-line stability coupled with cost optimization initiatives and favourable interest and exchange rate movements, translated into a 38% improvement in PTCL Group's net profit for the year. PTCL Group's cellular arm, Ufone, performed well despite COVID-19 challenges and was able to successfully cross 10 million data customers by smartly expanding its LTE footprint. On the other hand, Ubank - our microfinance bank - continued its exceptional growth momentum and has achieved a 50% growth in its revenue over last year by increasing its customers' loan portfolio and deposits.

We will be pursuing sustainable growth in our business ensuring safe and environmentally responsible ICT services while maintaining sustainability goals as a guiding compass. Moreover, customer satisfaction, besides fulfilling the community's need for digitalization and its development, will be our focus. We will continue to invest in our network while digitalizing our systems to sustain business and support the community and economy.

I greatly acknowledge and appreciate the continued confidence of our valued shareholders. We believe in cultivating strong relationships with shareholders and other stakeholders and will strive hard to secure and maximize their value. I would also like to thank the Government of Pakistan and Etisalat Group for their continued support.

Dr. Muhammad Sohail Rajput
Chairman PTCL Board

Group CEO Message

The outbreak of the COVID-19 pandemic has witnessed the proliferation of digitalization and revealed its significance for the community and businesses to sustain during crises. The business paradigm, as well as individuals' requirements, have evolved through structural reforms to fit in 'the New Normal' where the role of telecom services and digital solutions has become pivotal.

We, being the national carrier of Pakistan, not only consider this as an opportunity but also as our corporate responsibility to ensure the availability of telecom services and digital solutions to our nation - be it individuals, businesses, banking, health, education, e-commerce, etc.

We strongly believe that our future depends on the sustainable work we do today. Our Sustainability Report 2020 encompasses our achievements, our dedicated and focused efforts, and our contributions to support all segments of the society in the midst of a crisis: hence, affirming PTCL's position as a leading telecom operator of the country. We observe a sustainability framework comprising of five key pillars, i.e., accountable business practices, marketplace and customers, connecting communities, environmental management, and our people, for defining and managing our environmental, social, and economic impacts. Our sustainability plans and efforts are aligned to support the Digital Pakistan Vision and the United Nations Sustainable Development Goals.

We are focused on building our organizational capability in Information and Communications Technology (ICT) services and System Integration: thus, enabling managed security solutions, data centers, and managed services in the ICT landscape. We are responsibly expanding and investing in our networks, ensuring the availability of reliable yet affordable high-speed digital services for the community. We are sure that it will augment the country's digital transformation besides improving the quality of life of our citizens and will also help society to operationalize its economic activities efficiently and effectively.

I am confident that the PTCL Group will timely adopt the appropriate measures and proficiently utilize its investment capabilities for sustainable business growth. We will ensure that we utilize the prevailing as well as coming opportunities and thus, increase value for our customers, society, employees, and shareholders.

I extend my sincere thanks and gratitude to all those who contributed to the success of PTCL Group in 2020 viz. our customers for their continued patronage and our shareholders for their continuous support, and our employees whose hard work and relentless service, despite the challenges of the COVID-19 pandemic, formed the basis of the success achieved. I would also like to extend my special thanks to all the regulatory bodies and policymakers who have been thoroughly engaged and keen for the sustainable growth of the telecommunications and ICT industry in Pakistan.

Hatem Bamatraf
Group CEO

About PTCL

Vision

Our vision is to be the leading and most admired Telecom and ICT provider in and for Pakistan.

To be the partner of choice for our customers, to develop our people and to deliver value to our shareholders.

To realize our vision, we continue to execute against four balanced strategic imperatives that not only align with our strategic direction but also allow us to take advantage of growth opportunities. Our Values are defined as follows:

PTCL CORPORATE VALUES

WE CARE	WE PUT CUSTOMER FIRST	WE WORK AS ONE TEAM	WE EMBRACE CHANGE

1. **We Care:** We treat everyone with RESPECT, DIGNITY and RESPONSIBILITY.
2. **We Put Customer First:** We are passionate about serving our CUSTOMERS. Their SATISFACTION is a KEY measure of our SUCCESS.
3. **We Work as One Team:** We SEEK and VALUE everyone's CONTRIBUTION. Together, we are STRONG.
4. **We Embrace Change:** We SHAPE our own DESTINY by being proactive and open to NEW IDEAS.

Awards and Recognition

PTCL won an award for Employee Engagement/Volunteering at the NFEH CSR Awards 2020.

PTCL won two awards for Progressive practices in Communication and Social Responsibility at the Global Diversity and Inclusion Benchmark Standards (GDIB) 2021. These awards were based on the performance of the year 2020.

Optcl

CORPORATE SOCIAL RESPONSIBILITY

wins big

at the GDIB Awards 2020

Corporate Profile

Pakistan Telecommunication Company Limited (PTCL) is the largest integrated Information and Communications Technology (ICT) company of Pakistan. With a humble start from a telephone and telegraph department in 1947, it has evolved to offer latest digital and telecommunications technologies today. PTCL was incorporated in Pakistan on 31st December 1995 and commenced business on 1st January 1996. The company, which is listed on the Pakistan Stock Exchange (PSX), was established to undertake the telecommunications business formerly carried on by the Pakistan Telecommunication Corporation (PTC) and before that by the telephone and telegraph department. The company provides telecommunications facilities and provides domestic and international telephone services and other communication facilities throughout Pakistan. The company has also been licensed to provide such services in the territories of Azad Jammu and Kashmir and Gilgit-Baltistan.

Sustainability

Sustainability is at the core of everything we do. We strive hard to operate responsibly and transparently by living our inspiration for 'Moving Towards a Sustainable Future'. We are committed to having a positive impact on our communities, while at the same time maintaining sustainable success.
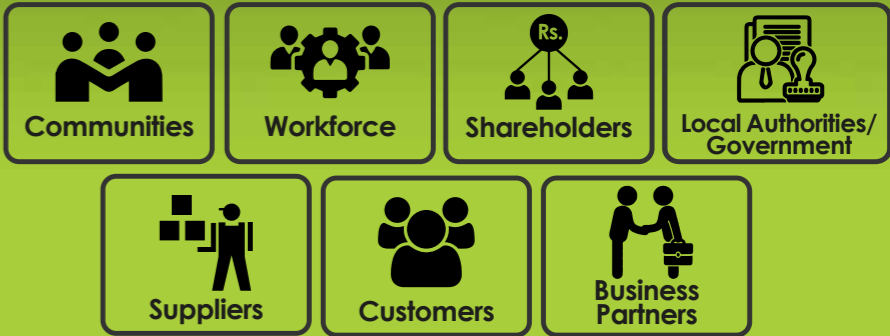
We are embarking on a progressive roadmap to monitor, benchmark and continuously enhance our economic, environmental, and social performance.

Stakeholder Engagement

Understanding the views and concerns of PTCL's diverse stakeholders informs our business practices and corporate priorities. We regularly engage our key stakeholder groups, represented in the diagram, to help shape and drive our sustainability strategy. Through various communication channels, we listen and seek feedback from the stakeholders who are affected by our business.

List of Stakeholder Groups

Communities · Workforce · Shareholders · Local Authorities/Government

Suppliers · Customers · Business Partners

Materiality Assessment

We continuously seek to identify and respond to existing and emerging global and regional matters that present risks as well as opportunities for our business and key stakeholders. To single out key material issues, we:

1. Identify a list of potential material issues through desk-based research, including a review of peer companies, industry standards, and employee interviews.

2. Prioritize stakeholder (both Internal and External Group) and topics to rate material issues in terms of their perceived importance.

3. Review results internally within PTCL management and the sustainability team. This review ensures that the list of material issues captures and is inclusive of all stakeholder perspectives.

1. Customer Privacy and Data Security
2. Customer Satisfaction
3. Responsible Marketing Communications
4. Economic Performance
5. Digital Innovation
6. Corporate Governance
7. Business Continuity and Enterprise Risk Management
8. Climate Change and Energy Management
9. Digital Access and Inclusion
10. Health and Safety
11. Talent Attraction, Retention, and Development
12. Diversity and Equal Opportunity
13. Social Impact and CSR
14. Sustainable Procurement Practices

Sustainability Framework

To conceptualize sustainability, we rely on our sustainability framework for defining and managing our environmental, social, and economic impacts. Our framework has five key pillars: Accountable Business Practices, Marketplace and Customers, Connecting Communities, Environmental Management, and Our People. We believe that an effective framework, supported by progressive improvement programs, will help us achieve our strategic business objectives.

This report provides our disclosure and progress against each of these areas.

Marketplace and Customers
- Digital Innovation
- Customer Satisfaction
- Customer Privacy and Data Security
- Responsible Marketing Communications

Accountable Business Practices
- Economic Performance
- Corporate Governance
- Business Continuity and Enterprise Risk Management
- Sustainable Procurement Practices

Our People
- Talent Attraction, Retention, and Development
- Diversity and Equal Opportunity

Connecting Communities
- Digital Access and Inclusion
- Social Impact and CSR
- Health and Safety

Environmental Management
- Climate Change and Energy Management

Alignment to Standards

As one of the largest telecom companies in the region, we recognize our role in the industry to deliver meaningful contributions to national and international standards and sustainability priorities.

We have aligned our sustainability plans and efforts to support these ambitious goals. We do this to ensure the sustainable development of a robust economy and a motivated society.

Marketplace and Customers

Digital Innovation

Digital inclusion has become salient especially during the pandemic-driven trends of remote working, distance learning, telemedicine, and other remote services.

PTCL's digital transformation journey continued exceptionally well this year whereby technology created the required bridge amid the pandemic to connect people, ensure business continuity, and help everyone adapt to the new status quo. PTCL took a proactive step in securing digital services in various segments and work structures, adapting to the new needs, and creating the required opportunities to fight the pandemic.

The wave of digitalization is gaining momentum and it has forced traditional businesses to change their operating models to be more agile. From thriving online banking to the booming e-commerce industry, digitalization is transforming businesses and enabling them to adapt quickly and effectively to changing circumstances. Increased demand for Cloud infrastructure, security solutions and managed services is generating new opportunities for telecom operators. To capture market opportunities, PTCL, going forward, will focus on building organizational capability in Information and Communications Technology (ICT) services and System Integration: thus, enabling Managed Security Solutions, Data Centers, and Managed Services in the ICT landscape.

We also revamped the PTCL website and Touch App in alignment with our digital strategy to achieve organizational goals and improve customer experience on digital platforms. This initiative brought traffic from conventional platforms to digital platforms. During the pandemic, we used our digital platforms to empower our customers with self-service features such as bill inquiry, bill payment, complaint registration and status, usage inquiry, bucket recharge, and quick links for payment options; this helped increase bill payments from 6 Million in April 2019 to 24 Million in April 2020.

Digitalization

Our customers' demand for connectivity and digital services, and the need for simplicity and adaptability, have reinforced the importance of our strategy. This year, we accelerated our digital transformation by building new digital and technological solutions and enabling our customers to interact with us easily through online platforms. This transformation meant that when COVID-19 restrictions impacted our ability to answer our customers' calls, we were able to provide them with digital self-service capabilities as an alternative way to connect with us.

PTCL has taken numerous initiatives to upgrade the existing setup of PTCL applications for improved control and enhanced customer experience in many areas. The Company transformed its existing contact center in record time to meet COVID-19 challenges. The solution enabled agents to Work from Home (WFH) in order to facilitate valued customers during the pandemic. Furthermore, virtual platforms were provided to company employees to facilitate their work during the pandemic.

In continuation of PTCL's journey of improving customer experience, the Company also expanded its existing Service Management Platform (SMP) which provides a unified customer experience. This initiative enables PTCL to provide superior customer care while optimizing costs through automated workflows and a consolidated approach to service management.

As one of our core values is 'We Put Customer First', we are always exploring new avenues to adopt the latest technologies that will help in digitalization. Amidst the severity of the pandemic, PTCL was the first telco in Pakistan which enabled its call centers on the work from home model within 07 working days with complete strength. It helped us ensure our customers get seamless services without any disconnect.

PTCL also launched the Knowledge Bot System to help Contact Center front-end staff easily find answers to customer queries and save interaction time.

PTCL successfully implemented the LMS (Learning Management System) for contact centers and PTCL Shops. This system has effectively enhanced the capability of our front-end staff at Shops to better handle customer queries and complaints, leading towards the enhancement of Customer Experience.

The Company has deployed a social media management solution that helps to identify and assess PTCL brand and customer experience on social media and digital channels. This will also help in lead generation, sentiment analysis and identification of influencers for further improving PTCL's image and creating brand awareness.

TRIM

TRI*M (Measure-Manage-Monitor) is a study being used by PTCL to measure Loyalty Index of the customers comprising of Performance and Preference. The study is used to understand the strength and potential of our customer relationships, differentiate and stand out from competitors, identify which touchpoints, moments and experiences represent the greatest opportunities, and predict the customers' future behaviours.

Overall			
Measure	2020	2019	2018
TRIM	47	48	38
Performance	50	48	37
Preference	44	48	40

FCR (First Call Resolution)

FCR	
2020	98%
2019	94%
2018	95%

In line with the Company's strategy of digitalization, PTCL has embarked on as Internal Audit (IA) Digitalization journey to help the Company manage all aspects of the audit process and enable it to identify risk, create assessment reports, schedule projects, allocate resources and manage audits via an advanced electronic working papers database.

Customer
Satisfaction

As consumer trends and the COVID-19 pandemic continue to change the way customers want to interact with companies, PTCL is determined and focused on transforming its digital infrastructure to enhance and simplify customer experience which will ultimately lead to brand loyalty through customer satisfaction.

In 2020, customer-centricity remained the focus of all activities, and taking it forward, PTCL with the collaboration of Etisalat Group, became the first operator to implement the Customer Happiness Index (CHI) which became the baseline to track every customer's happiness/experience. The customer happiness framework came out to be the best predictor for churn and to execute targeted rehab activities.

| Year | INBOX | | | | COMMENTS |
	Positive	Neutral	Negative	Complaints	Complaints
2020	4%	30%	14%	52%	15%
2019	2%	31%	8%	59%	21%
2018	1%	32%	2%	65%	18%

• 100% positive sentiment in social media inbox/DMs
(Calculation based on 2% in 2019 and 4% in 2020; figures as shown in the above table for inbox)

• 24% increase in positive sentiments on social platforms/social media
(Calculation based on absolute positive sentiments aggregating inbox and comments: 3,624 in 2019 and 4,520 in 2020)

For the convenience of customers, we have developed a new official website for PTCL which is easier to navigate and saves customers' time and effort. Further, we have refreshed our PTCL Touch App to improve customer experience with a particular focus on becoming more user friendly. Now customers can virtually manage everything, from accessing the services they have subscribed to a simplified check-out experience. We have also created more avenues for easy payments and improved online bill payment channels for our valued customers. In 2021, we will continue to support the shift towards online activity across our brands to give customers more choice around how they engage with us and manage their accounts and to create a strong connection with our loyal customer base which will lead to footprint expansion in the long run.

Online Orders from our website:

Year	Website Orders Count
2020	**13,545** (148.3% increase)
2019	**5,455**
2018	**6,653**

We saw **23.24%** increase in our website traffic in 2020.
- **Website Users in 2020:** 5,966,881
- **Website Users in 2019:** 4,841,779
- **Website Users in 2018:** 7,618,725

Secure online complaint registration

Implemented new e-payment infrastructure to improve online payment experience

New payment solutions "PAY VIA BANK ACCOUNT" introduced on website for quick and easy payments from home.

Easy online payment even for guest users (one-time login)

Introduced biometric feature in PTCL Touch App

Customer Privacy and
Data Security

Data security and customer information privacy are very important pillars of PTCL's work ethics and are dealt with utmost seriousness. Our customers are provided with a privacy notice over various channels (electronic – website, paper – sales contract) on the processing of their personal data.

Compliance with the given set of rules ensures that best practices are followed on matters related to the privacy and confidentiality of customer data. Protocols are in place to assure the protection of customer data to avoid data leaks, theft and/or loss. Responses to related issues are carried out with the utmost precaution and diligence. PTCL as a company complies with all laws and regulations related to the protection of customer privacy and data security, and takes steps to align with ISO certification standards related to the matter. The company is committed to maintaining customers' privacy at all costs. In 2020, there were no cases concerning breaches of customer privacy, data leaks, theft, or loss. Protection of customer privacy is paramount for PTCL, and as such, all necessary prudent measures are developed constantly to protect the customers' data at all times.

PTCL also diligently monitors all its international routes to stop and block any illegal traffic to ensure seamless availability of data and voice services. An increase in the use of OTT applications and illegal grey traffic termination in Pakistan has had an impact on the company's performance, PTCL is ensuring concerted efforts in collaboration with PTA, CMOs and LDI industry to implement proactive measures to control the grey traffic menace. Web Monitoring System (WMS) has also been installed at the ingress of all International IP bandwidth to monitor and curb illegal grey traffic on the network. All these measures are taken to facilitate and address customer concerns for more trusted and reliable relationships.

Information Security
Steering Committee

Information Security Steering Committee (ISSC) oversees the information security of PTCL and ensures the continuous enhancement of cyber security controls to protect customers' data and protect the wider business. The committee is responsible for suggesting new security controls, creating, and updating security policies, and arranging for security training and awareness for our staff. ISSC meetings are held regularly to review the information security plan and progress, approve security policies, provide leadership and support, and review the key performance and key risk indicators. In the past three years, ISSC has developed and approved several information security policies, developed and implemented information security governance and compliance culture within PTCL, and provided resources to improve the information security posture of PTCL.

Security Policies

PTCL's information security policies address cybersecurity aspects related to our business environment which are reviewed regularly. The PTCL security policies cover all major Information and Cyber Security areas including data security, access security, host security, network perimeter, and security monitoring. The Information Security Steering Committee (ISSC) has approved a series of security policies covering all security domains to support our operations and ensure the protection of information assets in terms of confidentiality, integrity, and availability. PTCL's set of security policies includes:

- Information Security Policy
- End Point Protection Policy
- Access Control Policy
- Network Security Management Policy
- Information Classification Policy
- Acceptable Use Policy
- Encryption Policy
- Patch Management Policy
- Password Policy
- Log Audit and Monitoring Policy
- Data Backup and Recovery Policy
- Audit and Monitoring Policy
- Privacy and Protection of Privacy of Personal Identification Information (PII)
- Social Media Usage
- Email Security Policy
- Cyber Crime Policy

Security Training and Awareness

PTCL is using an e-learning platform to impart information and cyber security awareness to its employees. The training modules cover information classification, data security, effective password management, email security, incident management, phishing awareness, physical and environmental security, social engineering, card skimming and secure internet banking. Employees are made aware of information security guidelines and compliance. We also take disciplinary action against employees who violate customer privacy and data integrity. PTCL's training department has offered customized training to its employees based on the specific skillset requirements that include CISSP and CEH training. Special security awareness advisories have also been issued to employees and contractors for topics that include phishing, ransomware, COVID-19, etc. Phishing simulations have also been carried out to assess the security awareness of employees and address the gaps accordingly.

Looking Forward and Assessment and Compliance

To ensure the continued effectiveness of PTCL's information security management system, we undertake internal audits of IS systems covering application security, security operation processes, effectiveness of internal and external security controls, and user access reviews. We also engage a third-party firm to conduct external audits on an annual basis. Across PTCL, we ensure compliance with the Government and PTA's cybersecurity laws and regulations like PECA and CTDISR. PTCL's commercial data centers are ISO 27001 and 27017 certified including the cloud segment which is also PCI DSS certified. We regularly perform external and internal assessments of PTCL's cybersecurity protocols. Presently, PTCL is preparing itself for the audit under the 'Critical Telecom Data and Infrastructure Security Regulations 2020 (CTDISR)', an initiative of PTA. The audit aims to measure and assess the cybersecurity maturity of the organization. The scope of the audit includes compliance assessment of CTDISR requirements, which covers all three domains of people, processes, and technology. As a member of the Etisalat Group, PTCL is also working with Etisalat Group's Governance team for the implementation of the Cyber Security Framework in PTCL.

Impacts of COVID-19 on PTCL Cyber Security

PTCL was no exception to the challenges faced due to COVID-19. As remote working came into play, all employees required remote access that would be suitable for PTCL's business applications. Contact center teams also required remote access while working remotely. PTCL provided VPN access to its employees for smooth remote working and security policies/controls/awareness was ensured to avoid any COVID-19 related attacks. Internal audits conducted a special assessment to identify any gaps in the COVID-19 WFH scenario. To overcome the COVID-19 challenges, PTCL also utilized cyber threat intelligence reports of Etisalat and PTCL's security partners to secure its network and data. The well-established Information Security infrastructure and incident response procedures have successfully protected the organization.

Responsible Marketing
and Communications
Product Service and Quality

Cognizant of the growing demands of our valued customers, over the past year, PTCL has continued to launch various innovative and customized product offerings to serve the needs of customers. These offerings not only increased our existing customers' loyalty but also aided in bringing new customers to our PTCL family. PTCL recognizes the importance of ensuring the accessibility of its products and services across its footprint. Through its core services, the Company aims to increase access to its networks and optimize costs through the digitalization of its services. The Company developed a suite of verticals or non-core services that include e-health (online consultations), e-education (Q Taleem), and financial services (invoicing and payments) that led to the transformation of some very lengthy processes and actions.

The pandemic severely affected economic and social activities in the country which also resulted in bill distribution and payment challenges for the customers. PTCL quickly stepped forward to facilitate customers, cushioned customers from repercussions for late payments during the lockdown, and adopted alternate electronic channels, such as e-bill and e-payments, to manage the overall billing and collections.

During the peak time of COVID-19 when the whole country was in lockdown, PTCL collaborated with PITB (Punjab IT Board) to provide free educational content for students of grades one through twelve on PTCL Smart TV and App as "Taleem Ghar" SVOD bundle. PTCL also collaborated with the Ministry of Education and included Teleschool – an educational channel aimed at educating kids – on PTCL Smart TV and App. To even further engage and incentivize its customers, PTCL also offered a 50% discount on its SVOD bundle "e-junior".

By taking an inclusive approach in designing, creating, communicating, and marketing its products and services, PTCL in 2021 aims to achieve systemic and long-lasting positive change through digital transformation.

Launched COD (cash on delivery) in Dec 2019. During **2020**, we facilitated almost 2,600 customers with successful deliveries at their doorstep

Responsible Marketing

We at PTCL believe it is critical in our service industry, and extremely important as per our values, to be responsible, honest, and friendly in our marketing and communications campaigns as it helps build trust and loyalty among our customers. We give all our customers the choice to opt in or out from receiving our communications at any point.

At PTCL, we undertake a variety of activities proactively to ensure that our interactions with customers are positive and productive. Customer experience is of high importance for us, and to maintain the quality standards, a variety of engagement tools are used to track customer interaction and identify potential areas for improvement. Some of the activities include:

- Follow-up surveys that track the experience of customers within our stores and call centers

- Continuous tracking of customer sentiments through online channel assessment and SMS and phone surveys. Through the company's Net Promoter Score (NPS) surveys, it tracks customer dissatisfaction rates and creates actionable plans to address them

- Maintaining feedback and suggestion forums on PTCL's Official website, its social media channels, and call centers to receive customer feedback

- The Company also tries to engage with its customers even if the customer is not facing any issues. In addition, dedicated resources are assigned to respond to customer comments and messages on social media. This year, we have improved our response time on social media handles as well

- Customers can be called back based on their survey feedback to better understand their needs and enhance their experience

Accountable
Business Practices

Our Ambition

We aim to be a sustainability leader in the market by integrating sustainability into our internal systems and processes. Strong governance, accountability, and transparency practices are essential for engaging our wider stakeholders, including our supply chain partners, towards achieving mutual sustainability goals.

Material Issues Covered

- Economic Performance
- Corporate Governance
- Business Continuity and Enterprise Risk Management
- Sustainable Procurement Practices

2020 Performance Highlights

- The Group's net revenue amounted to PKR **129 billion**.
- The consolidated net profit increased by **38%** to PKR **3.3 billion**.
- PKR **6.2 billion** procurement spending was spent via local suppliers.

Economic
Performance

PTCL has played a fundamental role in the country's development since its inception. PTCL is a socially responsible organization that has been contributing to the economic development of the country while improving the quality of life of the workforce and their families as well as of the local community and society at large.
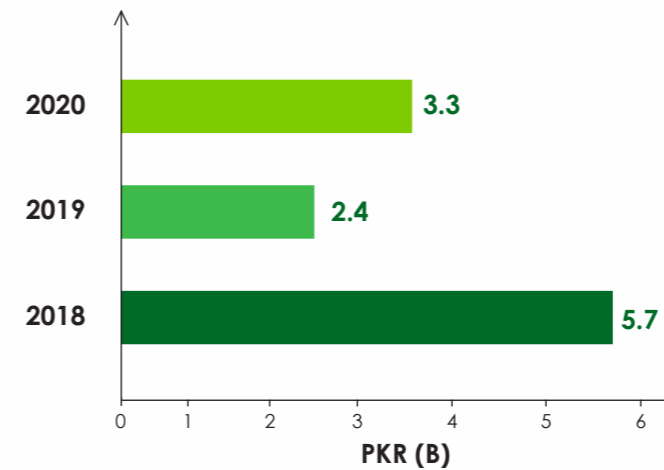
Like the rest of the telecom sector, PTCL also faces increasing demands to be more transparent and to demonstrate high standards of corporate conduct. PTCL fulfils the informational needs of those who use financial statements by ensuring transparency and consistency in its financial statements. PTCL prepares its Financial Statements in accordance with the International Financial Reporting Standards (IFRS) and provisions and directives issued under the Companies Act 2017. PTCL also ensures that its Financial Statements present a faithful representation of the effects of transactions and are comparable with other companies, particularly those working in the telecom sector. PTCL also provides financial statements' analysis for the past 6 years in its annual reports to help owners, managers, investors, and creditors assess financial performance and financial stability. PTCL believes that the best way to build long-term shareholder value is by a mutual understanding of all the stakeholders' needs.

In 2020, PTCL Group delivered a steady financial performance. Total group revenue remained stable at PKR 129 billion. However, if adjusted for the adverse impact of the pandemic and certain regulatory changes, our revenues grew by 5.2% year on year. PTCL Group has posted profit of PKR 3.3 billion, which is 38% higher compared to the last year. Importantly, we have also retained our strong financial position and PTCL has maintained the entity rating of "AAA" (Triple-A) and short-term rating of "A-1+" (A-One Plus) for the second consecutive year.

Net Profit

Year	PKR (B)
2020	3.3
2019	2.4
2018	5.7

Operating Cost

Year	PKR (B)
2020	124
2019	123
2018	117

Operating Profit

Year	PKR (B)
2020	5.6
2019	6.7
2018	9.4

EBITDA

Year	PKR (B)
2020	40
2019	41
2018	42

Revenue

Year	PKR (B)
2020	129
2019	129
2018	127
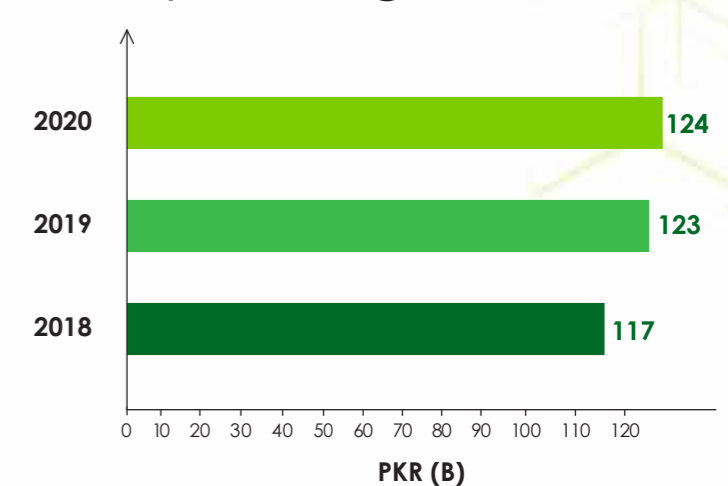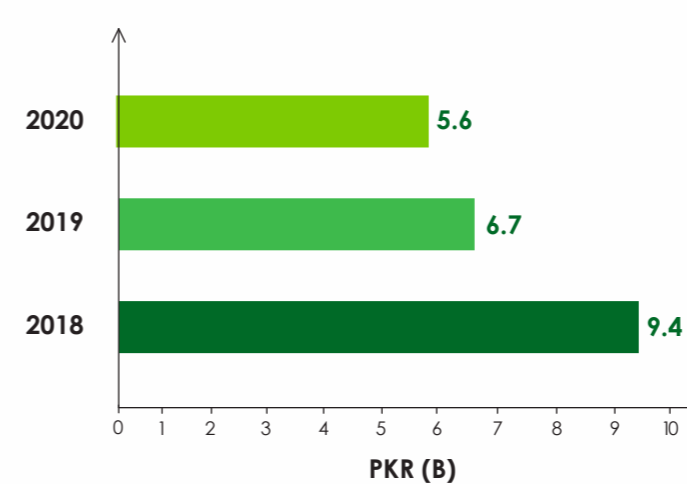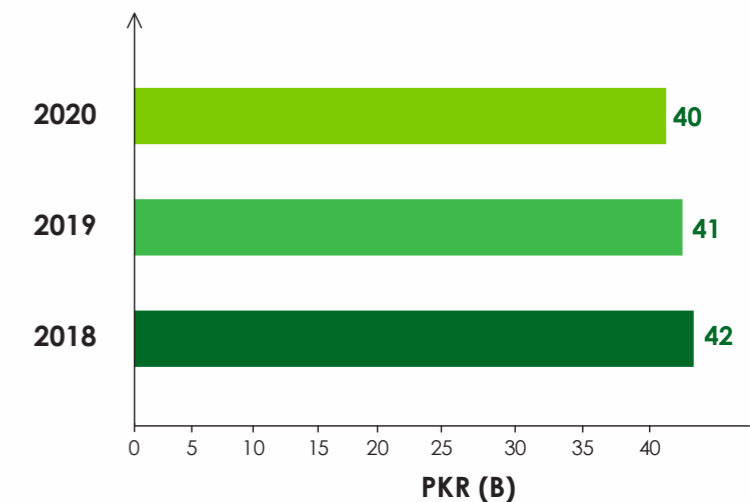
Dividend Paid to Shareholders

Year	PKR (B)
2020	
2019	5.1
2018	5.1
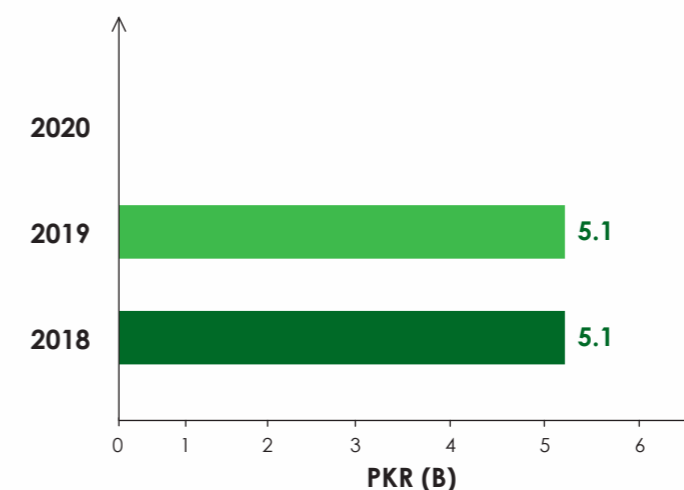
Wealth Generated-PTCL
PKR in Million

92,558	−	30,452	=	62,106
Gross Earnings and Taxes		Purchases		Wealth Generated

To Government

35%	36%	36%
21,842	21,680	21,051
2020	2019	2018

To Employees

30%	28%	27%
18,447	16,990	15,734
2020	2019	2018
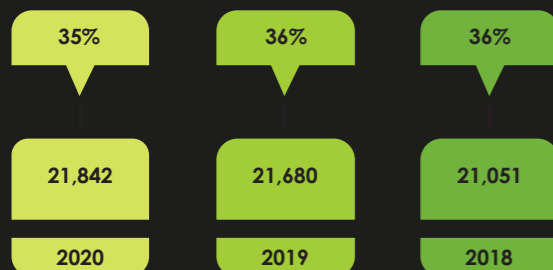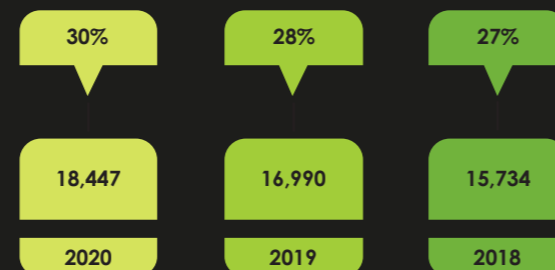
Wealth Generated

2020	62,106
2019	59,642
2018	58,147

Expense on Investment

25%	25%	24%
15,787	14,624	13,940
2020	2019	2018

To Shareholders

10%	11%	13%
6,030	6,347	7,422
2020	2019	2018
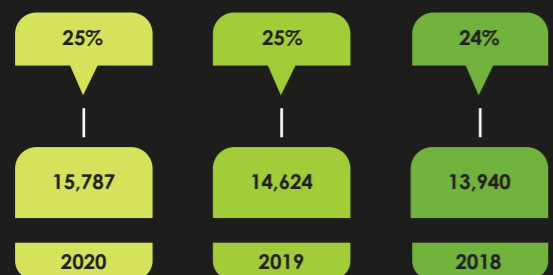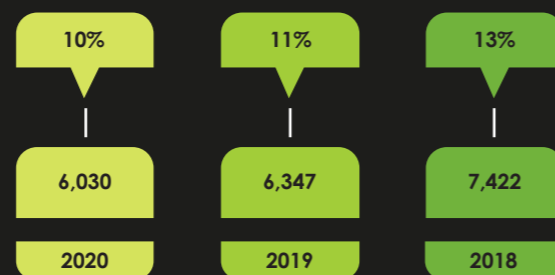
Government and regulatory bodies are engaged through meetings with government officials and representatives in various events. The prime concerns are compliance with applicable laws and exploring possible ways for partnerships for sustainable development. PTCL ensures contribution to USF and National ICT R&D fund to serve in underserved a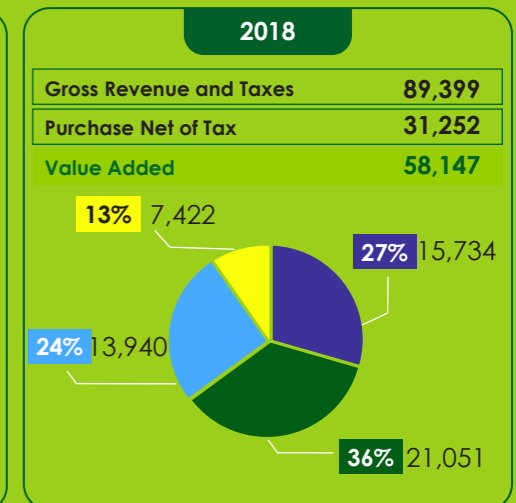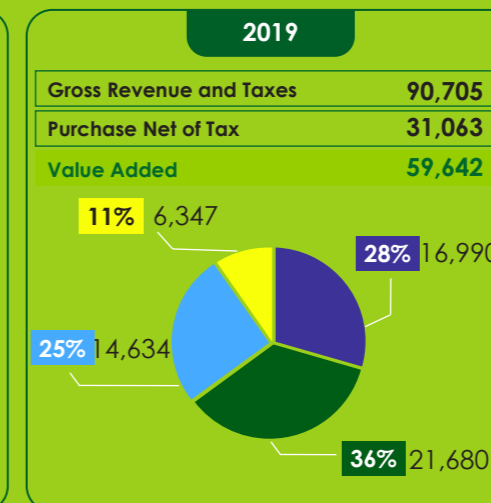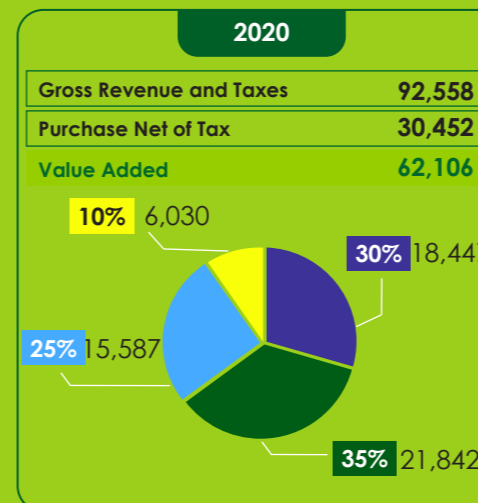reas of Pakistan. In the current year, PKR 50 million was donated to the Prime Minister COVID Relief Fund. PTCL continues to be one of the highest taxpayers of Pakistan.

Employees are regularly engaged through town hall meetings, zonal meetings, annual recreation days, and annual dinners. As employees were concerned about training and opportunities for increasing their skillset and maintaining their health and safety in the workplace, PTCL invested in health and fitness activities for its employees and also made monetary compensations.
The average number of employees during 2020 was 16,260 (2019 – 16,414). Despite COVID-19, PTCL ensured the job security of its employees.

Expenses on Investment: PTCL, through its smart investments in energy optimization and use of renewable sources of energy, is reducing its environmental emissions.

To shareholders: PTCL acknowledges and honours the trust our investors put in us by providing a steady return on their investment and managing the impact on the environment and society. We are making continued investments in our infrastructure, diversifying into different business segments, investing in cleaner technologies, and extending the CSR program to ensure consistent returns with minimal negative impact.

PKR in Million

2020

Gross Revenue and Taxes	92,558
Purchase Net of Tax	30,452
Value Added	62,106

- 10% 6,030
- 30% 18,447
- 25% 15,587
- 35% 21,842

2019

Gross Revenue and Taxes	90,705
Purchase Net of Tax	31,063
Value Added	59,642

- 11% 6,347
- 28% 16,990
- 25% 14,634
- 36% 21,680

2018

Gross Revenue and Taxes	89,399
Purchase Net of Tax	31,252
Value Added	58,147

- 13% 7,422
- 27% 15,734
- 24% 13,940
- 36% 21,051

■ To Employees ■ To Government ■ Expense on Investment ■ To Shareholders

Approach
to Tax

PTCL's founding philosophy is to contribute to the national economy and the telecom industry by "enriching people's lives through telecommunication services" and "creating employment and enriching the local economy by paying taxes as a locally rooted company".

PTCL seeks to achieve sustainable results through cost reduction and commits to its responsibility to make appropriate tax payments as the most basic form of social contribution in the communities in which PTCL conducts its operations.

PTCL complies with local, applicable laws and regulations in all jurisdictions in which we operate as well as relevant international tax standards, such as the OECD Transfer Pricing Guidelines, arm's-length standards, as established by international organizations. In addition, PTCL structures its normal business operations to be consistent with its low tolerance for tax risk.

PTCL is committed to educating its employees on complying with its tax policy through training and e-learning. We value tax transparency by actively strengthening tax governance throughout the PTCL organization by partnering with our business divisions and through strict internal controls and high standards.

PTCL formulated a group taxation policy in 2018 and disseminated it to all its subsidiaries to promulgate PTCL's stance on tax payment and taxation policy in an easily understandable manner and promote its stakeholders' understanding of it.

PTCL has always endeavoured to practice tax-related duties of high quality by maintaining compliance with taxation.

Corporate Governance

PTCL endeavours to showcase high standards of corporate governance and intends to nurture a culture throughout the organization that follows the best practices of corporate governance. We are committed to developing an optimal governance environment for our business activities and operations in accordance with the local government laws, rules, regulations, and best international practices. PTCL has adopted effective governance principles that allow the Company to smoothly run its operations aligned with an integrated system of policies and procedures.

PTCL operates through several transparency platforms, including the media and press announcements, the Pakistan Stock Exchange web portal-PUCARS, and the PTCL website, which articulate Company's information and disclosures. Moreover, PTCL's Statement of Compliance with the Listed Company's (Code of Corporate Governance) Regulations 2019, serves as the most important platform for transparency and interaction with the shareholders and public. Corporate governance refers to adherence to all laws, rules, regulations, codes, and practices under which the Company operates. Moreover, it allows the Company to determine the role and responsibilities of different departments as well as partners and provides economic value to stakeholders in the long term while respecting the values of the community and also observing the corporate social responsibility with due attention. This report enunciates the corporate governance enabling shareholders and the public to get acquainted with the Company.

Board of Directors

The Board of Directors comprises nine members with an appropriate mix of core competencies, requisite skills, knowledge, and experience. Pursuant to the provisions of the Shareholders Agreement between the President of Pakistan on behalf of the Government of Pakistan ("GOP") and Etisalat International Pakistan ("Strategic Investor") and the Articles of Association of the Company, the GOP nominates four (04) members, while Strategic Investor nominates five (05) members. All members of the Board are non-executive Directors. The Board members and their respective shareholdings are annually disclosed in PTCL Annual Report. This year, the Board of Directors held seven meetings. PTCL Board has formulated a formal and effective mechanism for an annual evaluation of its own performance and its Committees.

The Board has developed its Terms of Reference in accordance with the applicable laws and Articles of Association of the Company and has also approved a comprehensive set of policies that serve as the governance framework for PTCL's Board of Directors. The significant policies include but are not limited to Corporate Compliance Policy (approved in 2021), Anti-Bribery and Anti-Corruption (ABAC) Policy, Third-Party Due Diligence and Engagement Policy, governance of risks and internal control measures (ERM policy), related party transactions policy, health safety and environment policy, corporate social responsibility policy, business continuity and disaster recovery policy, dividend policy, etc.

Board Committees

Three committees assist the Board of Directors in effectively running the Company's affairs and, thus, allow a streamlined management structure and approach. Each committee is governed by its own charter that defines functions, constitution mechanisms, conditions governing meetings, meeting quorum and decision making.

The meeting fee of the Board members is the amount paid for attending each meeting of the Board and Board's committees. The meeting fee of the Board Members is in accordance with the applicable local laws and Articles of Association of the Company. The remuneration of the Chairman has been approved by the shareholders at the general meeting. The Board has a formal Board's Remuneration Policy.

PTCL discloses the aggregate amount of remuneration/meeting fee, including all benefits/details in respect of the Chairman, Board of Directors, Chief Executive Officer, and Executives of the Company in the Annual Report. Further, PTCL also makes a disclosure of related party transactions in its Annual Report. PTCL Annual Report 2020 provides the detail of related party transactions with the Directors, Chief Executive, and key management personnel of the Company. The disclosure of the related party transactions in the Annual Report of the Company is in compliance with the requirements of IFRS as applicable to the Company. The Annual Report of the Company is duly adopted by the shareholders at the annual general meeting.

Audit Committee

The Board has constituted an Audit Committee comprising five non-executive members; four of them are Board Members in addition to one external member who is the Group Chief Internal Auditor, Etisalat. Audit Committee members are experienced and well-versed in financial and accounting matters. The frequency of the minimum number of meetings is subject to the provisions as contained in the Listed Companies (Code of Corporate Governance) Regulations 2019, whereby the audit committee shall meet at least once every quarter of the financial year prior to the approval of interim results of the Company by the Board and after completion of external audit. During the year 2020, a total of five meetings of the Audit Committee were held. The Audit Committee undertakes an annual self-assessment of its own performance.

The Board has developed the terms of reference of the audit committee. The Board has provided adequate resources and authority to the audit committee to carry out its responsibilities effectively in accordance with its Charter and in compliance with the applicable laws and regulations. Following are key functions of the audit committee:

- Make recommendations to the Board about the Company's financial statements and appointment of external auditors
- Review the scope of internal control
- Monitor statutory and corporate governance compliances
- Determine the appropriate measures to safeguard Company's assets
- Review enterprise risk management processes and exposures and recommend appropriate policies to the Board
- Review and recommend significant policies and the Company's delegation of fiduciary powers
- Oversee tax and fiscal exposures
- Discuss major internal audit findings with external auditors
- Review whistleblowing material cases

Human Resource and Remunerations Committee

The HR&R Committee comprises five members. All members of the Committee are non-executive Directors. The meetings of the Committee are convened periodically and whenever necessary. Total five meetings of the HR&R Committee were held in 2020. The Committee reviews its own performance and ensures its work efficiency. Following are key functions of the Committee:

- Review and recommend development and maintenance of long-term HR policies, effective employee development programs, appropriate compensation and benefit plans, and good governance model in line with statutory requirements and best practices of good corporate governance.
- Ensure that the governance and HR policies and procedures are aligned with the strategic vision and core objectives of the Company.
- Provide leadership and guidance for the organizational transformation required to achieve Company's corporate objectives.

Investment and Finance Committee

The Investment and Finance Committee consists of five members. All members are non-executive Directors. The Committee held twelve meetings in 2020. The Committee has the mechanism to review its own performance. Following are key functions of the Committee:

- Review and recommend the Company's annual budgets and business plans, Company's treasury policies and framework including investment/divestment strategy, financial risk, management strategy and rules, execution of mergers and acquisition strategy, procurement policy and procedures, investment projects encompassing expansions and new technologies based on evaluation measurement indicators, and Company's capital structure strategy including external funding requirements.
- Evaluate Company's dividend policy in accordance with regulatory provisions and Company's funding and working capital requirements.

Ethics and Compliance

PTCL is committed to developing a culture that ensures its full external compliances and allows the organization to adopt and develop a culture of internal compliances. The external compliances are the areas where applicable laws, rules and regulations spell out the conduct of the organization, while the internal compliances lead how PTCL employees, third-parties, business associates, etc. comply with the policies and procedures of the Company. We at PTCL are committed to acting in Company's best interests by staying within the limits of laws and taking all possible measures to prevent the Company from any loss or damage to its interests and reputation. The actions and behaviours of PTCL's employees constitute its organizational culture and the image of its corporate values, which then determines PTCL's standing in society and, ultimately, reflects the corporate brand.

At PTCL, the best corporate practices are followed. PTCL is committed to operating its business activities with high standards of ethics and integrity; its corporate compliance processes and procedures enable the Company to provide reasonable assurance to comply with applicable laws, rules, and regulations, including the Code of Conduct, Anti-Bribery and Anti-Corruption, Conflict of Interest, Gifts, Entertainment and Other Business Courtesies, safeguarding information and assets, communications and reporting, whistleblowing, etc. The Corporate Compliance team is instrumental in raising awareness among the employees as well as the third parties about the processes and procedures of the compliance program. Accordingly, the compliance team is continuously engaged in drafting and updating policies, developing the monitoring and control mechanisms, and arranging awareness sessions on compliance governance policies and controls to ensure compliance by the employees and third parties with ethical standards and best practices.

To ensure adequate dissemination of compliance policies and procedures throughout the organization, we select Compliance Champions for each department at PTCL who then engage with the Corporate Compliance Department for day-to-day coordination. These Compliance Champions are in turn responsible for guiding their colleagues within their respective departments in light of the Corporate Compliance Program.

PTCL observes the laws of Pakistan and intends to enhance the general well-being of the society, which includes promoting education, health and cultural activities conducive to the growth and development of our fellow citizens. PTCL regularly reviews and assesses the compliance policies and procedures to ensure its effective implementation across the organization and provides all necessary guidance to PTCL departments and employees on inquiries related to compliance topics.

Code of Conduct

The Code of Conduct has been designed to promote ethics, honesty, and professionalism within the Company. PTCL adheres to the Code of Conduct in carrying out its operations, to preserve public trust, ensure sustainable growth and development, and create value in the Company.

Every employee and Director of PTCL, including contractors or consultants who are our agents or working on our behalf or in our name through outsourcing of services, processes, or any business activity, is expected to act in accordance with the Code. Also, the independent vendors are made aware of the Code and uphold the same standards as set out in the Code.

Our publicly available Code of Conduct covers topics such as bribery and corruption, gifts, entertainment and other business courtesies, conflict of interest, and money laundering and is communicated to all employees. The code clearly defines PTCL's standards and expected behaviours in respect of each topic enunciated in the Code.

In a continuous effort to foster high standards of professional conduct among PTCL employees, a digital module called "Code of Conduct" was launched in August 2019. The purpose behind the creation of COC was to create awareness around PTCL's Code of Conduct, which links the organization's mission, values, and principles with standards of professional conduct.

COC comprises interactive scenarios reflecting employees' day-to-day encounters within the Company. It encourages self-introspection and initiates powerful discussions around ethics and compliance amongst the employees. Moreover, it plays an instrumental role in empowering the people at PTCL to handle ethical dilemmas they encounter in their work routine in the most professional manner. Therefore, this e-module serves as a central guide to support an employee's daily decision-making process.

After PTCL employees have completed the entire e-module, they get a digital certificate declaring them PTCL COC Certified.

Transparency, Anti-Bribery and Anti-Corruption

PTCL is committed to applying the highest standards of ethical conduct and integrity in its business activities and prohibits all forms of bribery and corruption. PTCL has formulated an Anti-Bribery and Anti-Corruption ("ABAC") policy that sets out its responsibilities to comply with laws against bribery and corruption. Subject to the applicable ABAC laws, the policy applies to PTCL, its members of the Board of Directors, as well as to its employees. PTCL endeavours to ensure that all its vendors, contractors, suppliers, and third parties may also adopt and implement a similar policy with respect to the jurisdictions in which they operate. All employees must understand and adhere to the ABAC Policy that provides clear guidelines about bribery, facilitation payments, gifts, entertainment, meals and hospitality, political donation and charitable contribution, requirements for accurate books and records, avoiding and managing conflicts of interest, and managing transactions with intermediaries and third parties. To ensure that all employees are aware of and understand the ABAC Policy, PTCL launched an ABAC awareness campaign and developed ABAC e-learning modules.

In addition to the ABAC Policy, PTCL has also developed a Third-Party Due Diligence and Engagement Policy to ensure that its relationships with business partners are based on the Company's ethical business standards and made in a legal, ethical, and transparent manner, specifically from the perspective of Anti-Bribery and Anti-Corruption Laws.

PTCL ensures that any concerns that may arise in the course of dealings with current and future stakeholders, including but not limited to customers, partners and suppliers are identified, disclosed and properly resolved. PTCL is committed to prohibiting the giving or receiving of improper payments that are made with intention of expediting or facilitating the performance of routine governmental actions and/or for inappropriately obtaining or retaining a commercial advantage. The ABAC policy also defines the processes and procedures to deal with instances of non-compliance.

Anti-Competitive Practices

PTCL promotes fair competition and is committed to combating anti-competitive practices and behaviours in line with applicable laws. In 2020, no claims were raised against PTCL for anti-competitive behaviour, anti-trust, or monopoly practices. Training and awareness sessions for PTCL staff are conducted as part of the Company's compliance governance framework.

Combatting
Fraudulent Activities

Revenue Assurance and Fraud Management (RAFM) analysed existing as well as upcoming systems for identification of sources of revenue leakages and frauds. Accordingly, it designed a new KPI for optimizing the RAFM system. PTCL's Fraud Management is responsible for providing alerts on all sensitive areas to the owner departments' POCs. It makes changes in the thresholds in view of the risk profiles and provides the underlying data needed for end-user consumption and understanding. It also educates the owner departments on the fraud paradigm of new technologies.

Fraud management operates in the following core areas:

• Sales and Distribution Frauds
• Tech Frauds
• Subscription Frauds
• Business Frauds
• Prepaid/Post-paid Frauds

Whistleblowing Policy

PTCL is committed to the highest possible standards of openness, probity, and accountability. PTCL encourages employees and others that it deals with, who have serious concerns about any aspect of PTCL's work, to come forward and voice those concerns. PTCL ensures to keep confidential the identity of an individual raising a concern if so desired by the individual; the identity of the individual raising a concern or making a report is not revealed without his/her prior permission unless PTCL is by law required to reveal the identity of the individual. An investigation of unspecified wrongdoing or broad allegations is not undertaken without verifiable evidentiary support. Where there are deliberate false allegations, no matter how minor, disciplinary actions in case of employees and blacklisting and/or legal action for defamation may be taken against the whistle blower.

Telecommunications Regulatory
Violations and Penalties

Pakistan Telecommunication Authority (PTA), Pakistan Electronic Media Regulatory Authority (PEMRA). and Frequency Allocation Board (FAB) are the regulatory authorities that devise the framework for telecom operators to operate in Pakistan. PTCL's business operations are governed in accordance with the licenses granted to it by PTA and PEMRA and the frequency allocated to it by the FAB. The Competition Commission of Pakistan also played a pivotal role for the telecom sector in Pakistan to avoid the anti-competitive and monopolistic behaviours of telecom operators. PTCL abides by the regulations and instructions issued by the regulatory authorities. PTCL is also a member of the International Telecommunication Union (ITU). ITU is the United Nations' specialized agency for information and communications technologies. ITU is at the very heart of the ICT sector, brokering agreement on technologies, services, and allocation of global resources like radio-frequency spectrum and satellite orbital positions, to create a seamless global communications system that is robust, reliable, and constantly evolving. In addition to the 193 Member States, the ITU includes around 900 "sector members" – private organizations like carriers, equipment manufacturers, media companies, funding bodies, research and development organizations, and international and regional telecommunications organizations. These non-voting members can play a role in shaping the decisions of the Union.

Regulatory authorities ensure implementing a regulatory framework that stimulates competition and develops the quality of services provided. Our regulatory and commercial functions operate continuously with cross-departmental teams dedicated to achieving ongoing regulatory compliance requirements to the country's Regulatory Framework. It has been a great accomplishment for the Company that its business and operations are being carried in pursuance of applicable regulatory regimes and guidelines issued by respective regulators, from time to time. Accordingly, there has been no material breach or non-compliance identified by any regulators in recent years.

Business Continuity and
Enterprise Risk Management

At PTCL Group, Enterprise Risk Management is a structured approach to understanding key risks, making informed decisions to manage and control risk, and enabling the business to grow and achieve its results. It provides a framework for risk management which typically involves identifying events or circumstances relevant to the organization's objectives (risks and opportunities), assessing them in terms of likelihood and magnitude of impact, determining a response strategy, and monitoring progress. This will enable PTCL Group to better protect and create value for its stakeholders.

ERM assists PTCL Group management and its Board by helping them stay focused on the management of its risks and delivery of operational, financial, and strategic objectives, minimizing surprises and dealing more effectively with changing industry, economic, and operating environments.

The Internal Audit function is responsible for independently ensuring that the risk management measures are adequate and operating as intended. This is achieved via conducting audits of individual processes within the business and the methodologies/frameworks including the Risk Management methodology/framework. In essence, Internal Audit provides the third line of assurance – the additional layer of control necessary to provide the Board and stakeholders with confidence that PTCL's risk management meets the desired standard.

The COVID-19 outbreak had a drastic impact on the economy worldwide. PTCL Group adopted different strategies to mitigate the adverse effect of the pandemic and to ensure uninterrupted business/service continuity. Each department at PTCL Group has conducted a detailed analysis of the impact of COVID-19 on their domain.
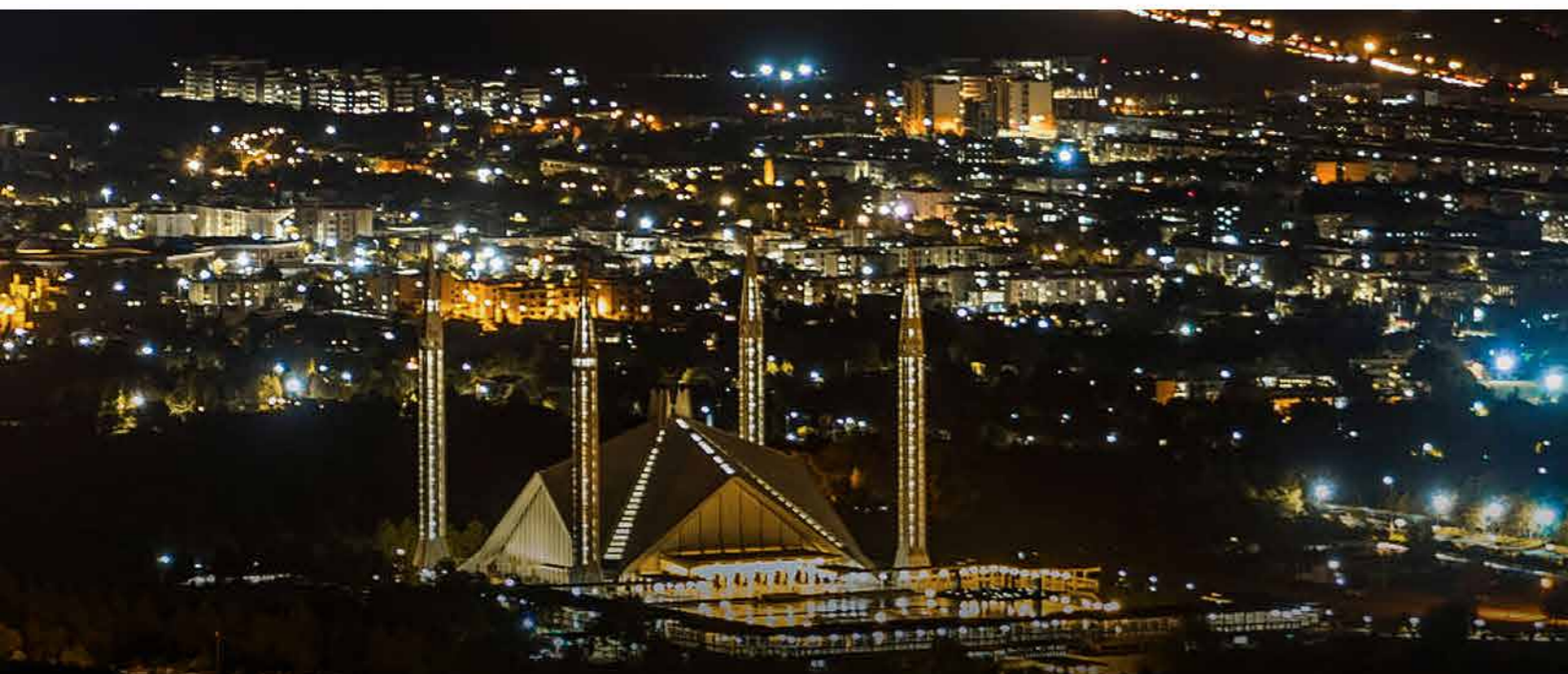
PTCL Group is among the leading organizations of the country that had implemented controls immediately in all important exchanges/corporate buildings, adding thermal screening at entry points, providing masks/sanitisers, SOPs on foreigners' access, etc. PTCL Group advised all employees to work from home and serve clients through digital, online, and call center channels, with the exception of those whose physical presence was critical.

Business continuity planning of 15 Business Units has been completed with complete technology domain (including critical services of HR, procurement, financial reporting, and contact centers). PTCL liaised with vendors to ensure the availability of spares and scheduled ordering and working of substitute material to avoid shortage of materials. PTCL initiated to facilitate customer bill payments and revenue collection through doorstep bill collection and digital medium collection. It has ensured the continuous monitoring of the cash flows for all business segments, helping anticipate any shortfall and make arrangements accordingly.

PTCL Group contributed PKR 100 million to the Prime Minister's COVID-19 Pandemic Relief Fund-2020 to support the government's efforts and serve the nation during trying times.
The following is a breakdown of some of the significant threats across PTCL Group's various operations and how these threats are being managed:

Type	Risk	Description	Management
Strategic Challeges	Competition from Other Operators	Operators are rolling out high-speed data networks across Pakistan and also entering in fixed-line business which can greatly impact PTCL's Business and market share.	PTCL mannages this by FTTH rollout, GPON deployment, introduction of Flash Fiber - a separate brand for FTTH service, improved Customer Happpiness Index (CHI) of subscribers by nationwide copper rehab. (Rehab of DCs, replacement of DPs and provision of tools for field staff).
	Competitive Customer Experience	Operators are offering aggressive data volumes at lowest prices, affecting Ufone's ability to meet customer expectations and to compete at par with industry.	Ufone manages this by efficient and optimal utilization of network rollout/upgrades and by offering attractive bundles to be at par with competition.
Operational Threats	Impact of COVID-19	The coronavirus outbreak has a major impact on the way of working. Social-distancing, large-scale quarantines, and travel restrictions have changed the working lifestyle.	Steering Committee monitored the risks/controls and meetings have been convened regularly to evaluate the situation. Committee issued instructions to continue strict implementation of SOPs. Work from home has been allowed and attendance in office has been monitored to not exceed 50%. Field workers continued moving directly into the field, placement of closure notices on Joint Shops and Service Centers, diverting customers to online channels and Call Centers for customer care services, where applicable. As at 30 September 2021, more than 90% employees of the PTCL Group are vaccinated.
	Cyber Security	Cyber attacks on the network and IT infrastructure may lead to theft of customer information and loss of service which may lead to disruption of service, reputational damage, and customer loss.	Separate Network and IT security teams proactively monitor activities across PTCL Group to identify and mitigate possible cybersecurity threats and data privacy breaches.
	Occupational Health and Safety Hazards	Occupational, health and safety hazards may lead to disruption of business, damage to infrastructure, and loss of human life.	PTCL Group has an Employee Health and Safety (EHS) team, which closely analyzes, inspects, and assures the availability of sound working environment throughout organization. PTCL Group has a zero tolerance policy towards all risks relating to safety and security of employees. EHS team regularly conducts training and spreads awareness among employees to follow safety measures in their working lifestyle.
	Business/ Service Continuity	There may be extended service disruption as a result of a disaster event and potential inability to restore services in a timely manner, leading to major financial loss and heightened customer discontent.	PTCL Group has a dedicated Governance and Business Continuity function which closely monitors and takes timely actions to assure the business continuity requirements. PTCL Group has conducted BCDR assessment and also obtained insurance for its nationwide assets to mitigate the risk of a significant cash outflow, in event of a disaster.
Compliance Challenge	Regulatory Affairs	Stringent regulatory framework impacts operations, distribution channels, and profitability.	PTCL Group has a dedicated regulatory function and CXO, which conducts continuous liaison with all stakeholders (Government, MoIT, Regulator, NADRA, etc.) and industry lobbying.
	Ongoing Litigations	Uncertainty surrounding the outcome of ongoing litigations in multiple jurisdictions with potentially negative reputational and financial impact.	PTCL Group has a dedicated legal team to handle and supervise litigations and proceedings in court.
Financial Threats	Adverse Forex Fluctuations	Devaluation of PKR would have a financial impact due to the net USD outflow.	PTCL Group financial team continuously monitors the forex fluctuations and measures are taken to mitigate the adverse impact of PKR devaluation by early USD payments where possible and through contract management.

Procurement Sustainability

Sustainable Procurement is a process whereby organizations meet their needs for goods, services, work, and utilities in a way that achieves value for money on a life-cycle basis while addressing equity principles for sustainable development, providing benefits to societies and the environment across time and geographies.
It means making sure that the products and services we buy are as sustainable as possible, with the lowest environmental impact and most positive social results.

Sustainable Procurement Practices

PTCL has implemented the best industry practices in the field where the aim is to have a Procurement Model best suited to the Company's Business Model, so to get the maximum benefit in terms of Value Chain.

PTCL intends to bring maximum sustainability to its Value Chain and Supply Chain Processes. Suppliers (business partners) play a very critical and important role in the whole process and through a defined Supplier Relationship Model. The process of Supplier Selection is a key factor in the procurement process, according to the respective category.

Supplier selection is accomplished from the pool based on their ability, financial strength, past experience and technical expertise in handling projects, giving preference to suppliers with a local presence.

Procurement Spend

(PKR in Billion)

2020	2019	2018
18.0	18.8	24.9
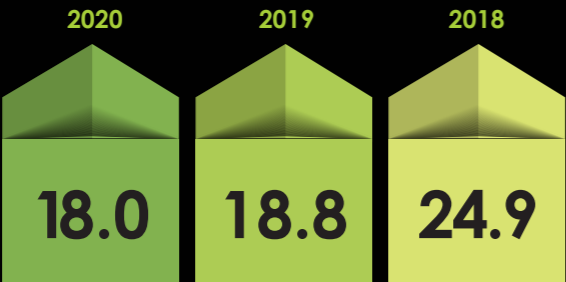
%Procurement Spend via Local Suppliers

Year	Value
2020	59.0
2019	56.2
2018	62.0

Total Spend via Local Suppliers (PKR in Billion)

Year	Value
2020	10.6
2019	10.5
2018	15.4

Procurement Spend 2018-2020 (PKR in Billion)

2020

Category	Total
FACT (Fixed, Access, Core Transport)	12.4
Wireless, Admin & Marcom	1.5
Information Technology	4.0

2019

Category	Total
FACT (Fixed, Access, Core Transport)	16.2
Wireless, Admin & Marcom	0.2
Information Technology	2.4

2018

Category	Total
FACT (Fixed, Access, Core Transport)	16.9
Wireless, Admin & Marcom	1.1
Information Technology	2.4

Procurement Cycle Process

During the COVID-19 pandemic in 2020-21, PTCL adopted a safer approach in terms of transforming the traditional procurement process to technology. The complete procurement process is now online except for Purchase Orders and Agreements which require physical signing. The bidding process happens online where the RFP/RFQ are floated to the Bidders through email and the subsequent bid submission is also made online to a prescribed email address (bidsubmission@ptcl.net.pk) particularly assigned for this purpose.

Vendor Management

Since 2020, an advanced process for Vendor Management has been adopted, where all the necessary data pertaining to vendors is updated in SAP; the annual performance of vendors is also updated in the SAP system. This gives realistic data to identify the best performers which helps in future Procurement Forecasting related to Vendor Management.

Business Continuity Model

PTCL is currently obtaining assurances from key business partners (suppliers) in different categories related to business continuation assurance in terms of Supply Chain Management (SCM) and related Support. The aim is to get assurance from the suppliers for continued uninterrupted support to PTCL for smooth business operations during any pandemic-related situation.

ISO Quality Audit

ISO Quality Audit has been a regular practice at PTCL for several years. Internal and External Quality Audit is conducted to quantify the adaptation level of process and documentation of Procurement and other Organizational Functions in terms of the defined parameters by the ISO Certifying International Body.

PTCL continuously improves daily operations and processes, particularly those related to the Procurement Function, where certain assurances in terms of documentary evidence are sought from business partners to safeguard our interest.

Compliance to ABAC,
Code of Conduct and Laws

Given the recent guidance from Etisalat, certain clauses related to Anti-Bribery, Anti-Corruption and Compliance (ABAC) to Laws and Regulations of the Contracted Country, etc. are being incorporated in all the Agreements and Contracts formalized with vendors.

Seeking to continually improve business practices, PTCL has recently made it mandatory to obtain compliance on Anti-Bribery and Anti-Corruption Laws and Code of Conduct from Vendors at the time of Registration with PTCL.

08

Our People

Our Ambition

PTCL Group is committed to becoming an employer of choice for the bright minds of the country. The company has structured its Human Resources function to proactively equip the organization to excel in these challenging times.

PTCL believes in onboarding the best talent and providing opportunities for their constant development and growth. We are proud to host a workforce of responsible citizens who live their lives by our corporate values and contribute to society through our focused philanthropic initiatives.

Material Issues Covered

- Digitization of systems and processes in wake of the ongoing COVID-19 pandemic
- Consistent learning and development of employees
- Health and well-being of employees through focused interventions
- Community support and disaster response

2020 Performance Highlights

- A GEES score of 76% for PTCL in comparison to 73% in 2019. A score of 80% for Ufone in comparison to 79% in 2019
- A complete shift to a hybrid working model for the entire organization
- Digitized operations of our HR sub-departments including Talent Acquisition, Talent Management, HR Strategy, Employee Services, and Learning and Development
- Health management of all employees w.r.t. COVID-19
- Care packs and ration packs for employees and their families living in isolation
- A nationwide Disaster Response campaign, courtesy of the PTCL Razakaar Trust – now renamed to the Rashid Khan Trust

Talent Attraction, Retention, and Development

PTCL Group is an equal opportunity employer that strives to attract the best talent from across Pakistan. Our employees are our biggest asset, and we ensure they get remarkable customer experience from the time they enter the organization. We are constantly aiming at bridging the industry-academia gap by establishing strategic alliances with educational institutions and providing corporate exposure through internships and batch hiring.

PTCL

PTCL	2020	2019	2018
Total Employees			
Total Count	16,210	16,351	16,506
Employment Type			
Management	4,282	4,274	4,163
Non-Management	11,928	12,077	12,343
Age			
18-30	695	724	780
31-50	9,658	10,782	11,835
51+	5,857	4,845	3,891
Employment Levels			
Senior Management	169	168	167
Middle Management	4,113	4,106	3,996
Staff	11,928	12,077	12,343
Gender			
Male	15,665	15,819	15,957
Female	545	532	549

Ufone

Ufone	2020	2019	2018
Total Employees			
Total Count	2,765	2,999	2,703
Employment Type			
Management	2,480	2,712	2,415
Non-Management	285	287	288
Age			
18-30	550	800	596
31-50	2,056	2,073	1,983
51+	159	126	124
Employment Levels			
Senior Management	34	33	35
Middle Management	312	277	281
Staff	2,419	2,689	2,387
Gender			
Male	2,425	2,598	2,395
Female	340	401	308

Employee Hiring

PTCL

PTCL	2020	2019	2018
Total New Hires			
Total Count	230	237	334
Age			
18-30	133	105	184
31-50	89	116	134
51+	8	16	16
Employment Levels			
Senior Management	3	8	4
Middle Management	221	200	319
Staff	6	29	11
Gender			
Male	196	205	288
Female	34	32	46

Ufone

Ufone	2020	2019	2018
Total New Hires			
Total Count	369	1,262	612
Age			
18-30	210	864	429
31-50	157	395	175
51+	2	3	8
Employment Levels			
Senior Management	0	1	4
Middle Management	20	27	39
Staff	349	1,234	569
Gender			
Male	318	1,026	559
Female	51	236	53

Employee Turnover

PTCL

PTCL			
	2020	2019	2018
Total Turnover			
Total Count	371	392	402
Age			
18-30	95	118	110
31-50	127	144	156
51+	149	130	136
Employment Levels			
Senior Management	14	15	10
Middle Management	216	257	268
Staff	141	120	124
Gender			
Male	350	343	364
Female	21	49	38

Ufone

Ufone			
	2020	2019	2018
Total Turnover			
Total Count	603	966	809
Age			
18-30	345	570	405
31-50	248	387	396
51+	10	9	8
Employment Levels			
Senior Management	2	0	4
Middle Management	17	29	35
Staff	584	937	770
Gender			
Male	491	823	700
Female	112	143	109

Building the Employer Brand

The Company capitalizes on internal and external social media platforms to connect with its employees, customers, and the community at large. Our presence on Facebook, Instagram, Twitter, and LinkedIn allows us to share what we continue to do to better the lives of people working at the PTCL Group. It also helps us in interacting with the public and feeling the pulse of what our future workforce will look like.

The Onboarding Experience

As the world was engulfed in the COVID-19 pandemic and everyone was compelled to shift to remote work, a major challenge was to effectively attract good talent, recruit the best cultural fit for our organization, and onboard it in a way that they would feel like a part of the PTCL Family immediately. Our teams were able to rise to the trial and completely digitized all operations related to the Talent Acquisition process.

For internal stakeholders, the Talent Acquisition team facilitated Contact Centers with operational plans to shift to remote work; customized hiring solutions were provided to departments with bulk-hiring, such as Sales, and a chatbot – Lina – was introduced to respond to employee queries in order to expedite communication between stakeholders.

Developing the Future Workforce

The Annual Experia Internship Program is a flagship initiative of the PTCL Group to mentor the brightest minds across top-tier universities of the country. PTCL was able to run the first-ever cohort of Experia entirely on a virtual model this year. The six-week program focused on their personal and professional development. It was also used as an opportunity to involve the youth in solving pertinent challenges of the corporate sector.

The organization rolled out the ICAEW/ICAP program for students of Accounting in order to give them real-life exposure and augment their technical skillset.

High-potential employees at PTCL were engaged in delivering capacity-building sessions to students at over 15 universities in major cities of the country. The sessions covered a myriad of topics and a multitude of functions and skillsets.

We were also able to challenge young minds by conducting a hackathon on contemporary business problems. Students were engaged in an immersive process of problem-solving and top performers were recognized for their contribution to the project.

Benefits

Our Company is constantly revisiting its Compensation and Benefits structure to benchmark against industry standards. PTCL Group offers the following major benefits to its full-time employees to assist them in living a comfortable life.

- Life Insurance
- Health Insurance
- Gratuity
- Health Care and Coverage
- Allowances
- Complimentary Services w.r.t. internet connectivity and SMART TV

Support for
New Parents

The company provides support to new parents through paid Maternity and Paternity Leave.

A three-month Maternity Leave for mothers allows them to settle in a routine with their new-born child and tend to their physical and mental health. We ensure that we provide them medical counsel during this time and allow them to adopt a flexible work schedule once they resume work after their leave period. Infants are welcome to accompany their mothers at our office locations and are provided with a secluded Day Care facility at the Headquarters building. Working mothers are also eligible to work from home twice each month in order to facilitate them with their additional responsibilities at home.

A five-day Paternity Leave for fathers enables them to support their spouse in welcoming a new life into the family. We encourage all our male staff to avail the leave so they can contribute to their domestic duties and play a responsible role in settling the family into a new routine. People Managers are encouraged to support new fathers with their additional duties at home and assist in managing their work with flexibility and accommodation. A total of 15,186 employees are entitled to parental leave.

PTCL

Maternity Leaves	PTCL		
	2020	2019	2018
Number of females employees that took maternity leaves	21	27	25
Number of female employees who returned to work after availing maternity leaves	21	27	25
Number of female employees who were still employed twelve months after returning to work	20	20	21

Ufone

Maternity Leaves	Ufone		
	2020	2019	2018
Number of females employees that took maternity leaves	11	0	0
Number of female employees who returned to work after availing maternity leaves	10	0	0
Number of female employees who were still employed twelve months after returning to work	10	0	0

People
Capability Building

PTCL Group holds a promising competitive advantage in the industry for personnel development, courtesy of its robust learning and development initiatives. The Company has an in-house Training and Development department that hosts an infrastructure of Training Academies in major cities of Pakistan. It also houses an impressive cohort of Trainers and Facilitators with academic accolades fit to design and deliver contemporary training. The Company has recently ventured into the field of Digital Learning and has successfully outpaced the competition with its successful skillset of designing in-house self-paced learning modules and established partnerships with notable training platforms such as SkillSoft, Harvard ManageMentor, and LinkedIn Learning.

Average Hours of Training per Year per Employee: 7 Hrs

Developing Talent

Amid dramatic disruption, the learning experience managed by the company took a revolutionary ingress into the virtual world. We are able to run the much-commended Speaker Series, which satiated the emotional and intellectual appetite of our employees. An impressive array of scholars, speakers, thinkers, and opinion leaders was invited to engage the workforce to find solace in turbulent times.

Our Online Functional Trainings brought awareness on important functional fronts covering domains of Business Development, Network and Business Operations, Customer Care, Retail Sales, Digital Services, Carrier and International Wholesale along with support functions such as HR, Marketing, IT and Finance.

Effective Communication and Stress Management sessions helped to improve productivity, mitigate burnout, and ensure smooth remote work across the organization.

Developing
Skillsets

The newly-incepted Tech Series helped in the digital upskilling of employees to thrive in the new reality and enabled them to properly use tools like MS Teams, Zoom, and MS Outlook.

Several virtual certification programs including Project Management Professional, Certified Ethical Hacking, Certified Lean Six Sigma (Green Belt), and CCNA (Routing & Switching) were also delivered successfully by external facilitators and industry experts.

As a major step towards digitization and transformation during COVID-19, PTCL introduced a unique virtual learning platform for 8,000 field staff named Madaadgar – Mobile Learning App. The initiative was driven by the desire to encourage company-wide commitment towards customer care and self-development, which are common denominators of a successful organizational culture.

PTCL Step Up App was another major leap towards digitization, aimed at upskilling more than 1,500 PTCL Engineering Supervisors, Technicians, and FMC staff.

Employee Engagement Scores (PTCL Group):

Year	PTCL	Ufone
2020	76%	80%
2019	73%	79%
2018	70%	73%

PTCL Group ensures that organizational performance is directly driven by high employee engagement levels. An engaged workforce is one that can be relied upon to deliver high-quality business results competently and consistently.

COVID-19 became a catalyst for digital transformation and made us rethink our strategy on the health, wellbeing, and safety of our employees. Banking on the positive experience PTCL has created for employees over the years, transitioning the Company's engagements to digital ones was a new opportunity that PTCL took advantage of. The mass mobilization of people to a work from home scenario was a first of its kind set-up that opened a new set of considerations for engagement, experience, and connectivity. Turning to remote work for the first time when the pandemic hit us made us realize the extent to which engagement is significant as a factor to drive business results.

PTCL ensured its engagement initiatives included employees on a social, purposeful, personal, and collaborative level. Arranging town halls by the Chiefs where thousands of team members could join in with just a single click and have their challenges discussed at the top level was never this easy. Digital platforms were provided to top-line management to speak with their teams, give updates, address issues, and recognize their team members holistically. Digital solutions and platforms were put in place to keep the pace of learning, development, and awareness steady. Dipstick and pulse surveys were conducted throughout the year across the Group as needed to gauge engagement levels. As a result of the engagements and activities arranged for employees:

- **93% of the workforce is proud to tell people that they work for PTCL Group**
- **87% of the employees would recommend PTCL Group as a great place to work**
- **85% of the employees can sustain the level of energy they need throughout the workday**
- **95% of the employees work beyond what is required to help the Group succeed**

Reward and
Recognition

Percentage of total employees by gender and by employee category who received a regular performance review during the reporting period:

Level	Female	Male	Total
Non-Management	225	11,711	11,936
Assistant Manager	177	2,014	2,191
Manager	94	1,076	1,170
Senior Manager	29	499	528
General Manager	5	117	122
EVP	1	33	34
CXO	1	11	12
Total	532	15,461	15,993
Total Employees	545	15,665	16,210
Percentage of Employees Receiving Regular Performance Reviews	97.6%	98.7%	98.7%

THIS IS WHERE WE CREATE MAGIC!

PTCL has been investing on the recognition front extensively to ensure employees remain motivated and this is reflected in their productivity. The following programs at PTCL help keep the culture of recognition up and running across the organization:

1. Presidential Business Excellence Awards – These are the most prestigious awards given to employees based on their performance against an extensive and transparent criterion. These awards weave together high-performance and business results by rewarding outstanding employees.
2. PTCL Champions Program – This exclusive program was launched with the intent to promote a culture of everyday reward and recognition for employees who perform above and beyond their assigned responsibilities. The program is run for both management and non-management employees.

Reward and Recognition UFONE:

The Management at Ufone believes in recognizing employees for their performance as soon as it is due. To drive the same sentiment across the organization at all levels, a variety of recognition programs have been launched in the company.

1. **On-Spot Recognition** – Exceptional performance awards provided to employees by their supervisors based on 3 categories:
   • Teamwork
   • Commitment and Dedication
   • Positive Attitude

2. **Peer to Peer Recognition:**
   • **Cheers for Peers Awards** – Celebrating the support provided by peers by recognizing their positive behaviours/traits on a fun, light note depicted in the award titles.

   • **#YouAreAwesome Awards** – We took pride in how quickly we emerged from the pandemic and embraced the digital environment. This was only possible due to the relentless help and support we, as Ufamily, extended to each other. Therefore, we launched a program to celebrate the fact that each one of us is "Awesome" by launching the **#YouAreAwesome program.** Everyone was provided with #YouAreAwesome digital cards to post on each other's workplace walls or to send over via email.

3. **Inter-team Recognition** – This is recognition provided by the top-level management on project-based performance to selected team members in the form of a recognition ceremony where employees are appreciated for their efforts.

4. **Academia Recognition** – Ufone has had strong ties and a long-standing relationship with the academia through its initiatives whereby the youth is provided opportunities to get a flavour of the corporate work culture in the form of internships and management trainee programs. The management of the Academia is often recognized for their relentless support and facilitation in running these programs smoothly from Ufone's side. Multiple students are also recognized in the form of recognition ceremonies conducted for Ufone's flagship Summer Internship Program every year.

5. **Self-Recognition** – To encourage employees to highlight their own significant achievements carried out during the year, the Shout out 2 U program was launched. Running on a bi-annual basis, employees are asked to send us their significant achievements posted on our internal communications channel with visibility across the organization which is then verified by the GMs of the respective teams. Once verified, the employees are given a "Shout" in the form of certificates over the same channel with visibility across the company.

6. **Ufone Warriors (COVID-19 Frontline Staff) Recognition** – Employees that have performed day and night to enable the smooth transition of the work from home setup and ensured continued business performance during the times when the strict lockdown was imposed were awarded as being the true Ufone Warriors!

Set for Growth

PTCL Group is home to an expansive workforce that stretches across multiples cadres, categories, and skillsets. The Company has been able to establish specialized systems for performance and career management that ensure our talent pool is consistently upgraded.

The Performance Management System acts as a roadmap for employee performance throughout the year as opposed to a one-time annual activity. Similarly, career development happens through Talent Reviews and the designing of customized Development Plans for individual employees.

PTCL Group has a significant inherent diversity by virtue of its presence across all provinces and cities of Pakistan. Our workforce is a welcome amalgamation of all regions, ethnicities, religions, and languages. The company is now focused on developing its acquired diversity with respect to gender and disability. We are striving to develop interventions that will enable both population groups to gain access to better employment and development opportunities at the PTCL Group. The Company is also committed to adopting a 3D approach to diversity by encouraging cognitive diversity among all its employees so that people of all thoughts and beliefs can feel welcome to contribute to decision making.

PTCL

Diversity and Equal Opportunity	PTCL		
Female Employment Rate (%)	2020	2019	2018
Number of Female Employees (Hired During Year)	34	32	46
Female Employment Rate (%)	15%	13%	13%
Female Employment Rate (%) by Employment Level	2020	2019	2018
Senior Management	0%	0%	0%
Middle Management	15%	13%	13%
Staff	0%	0%	0%

Ufone

Diversity and Equal Opportunity	Ufone		
Female Employment Rate (%)	2020	2019	2018
Number of Female Employees (Hired During Year)	51	236	53
Female Employment Rate (%)	14%	19%	8.7%
Female Employment Rate (%) by Employment Level	2020	2019	2018
Senior Management	0%	0%	0%
Middle Management	0%	0%	0.5%
Staff	14%	19%	8.2%

Celebrating Ability over Disability

As the first step to introduce Persons with Disabilities (PWDs) in PTCL's workforce, we introduced a cohort of 22 young graduates with unique needs for a six-week hybrid internship program. The cohort was rigorously mentored by qualified PTCL employees who were given Disability Sensitivity Training to effectively manage their respective resources.

Celebrating Women

The Company truly values its female staff. We have a multitude of female-centric policies that aim to ensure a conducive working environment for women working at the PTCL Group. These include paid maternity leave followed by flexible working schedules and an option to work from home twice a month for all working mothers. There is a Day Care facility at the Headquarters so new mothers can bring their children to work without having to worry about childminding services. The facility is also open to female/male staff that may want to bring their toddlers and school-going children along for a few hours. The female staff gets exclusive company transport and women with cars enjoy priority parking services. The female staff also enjoys a special quota in the annual Hajj ballot sponsored by the company.

Furthermore, all of the female staff at the PTCL Group is part of an exclusive club –The Pink Club – that undertakes a myriad of initiatives around the health, well-being, and engagement of the women at our organization. One of our recurring campaigns is the celebration of October for Breast Cancer Awareness whereby an entire month is dedicated to highlighting the importance of self-examination for early detection and treatment.

Connecting Communities

The Group views Corporate Social Responsibility as a strategic priority; it is also an important pillar of our brand. Our CSR interventions are pivotal in contributing to employee engagement as well. The Company develops partnerships with philanthropic organizations and undertakes community development projects in the areas of Education, Youth Development, Health and Safety, Environment, and Inclusion and Disaster Response. PTCL also runs an employee volunteer program – PTCL Razakaar – that hosts philanthropic initiatives across all regional offices every quarter of the year. We believe in operating as a responsible organization that uplifts the communities it operates within.

Employee Volunteerism
PTCL Razakaar

Clothing Drive

Number of Beneficiaries: **7,580**
Number of Volunteer Hours: **1,168**

In the first quarter, PTCL partnered with the Akhuwat Clothes Bank and urged its employees to donate clothing for deserving communities across Pakistan. The collections were sorted, cleaned, and packed by Akhuwat's team of transgender community groups and then distributed to impoverished households in family packets for male adults, female adults, and children.

Ramzan Dastarkhwan

Number of Beneficiaries: **35,000**

Number of Volunteer Hours: **176**

In the second quarter, as part of the COVID-19 Humanitarian Response, PTCL invited all employees to donate two-day salaries for the uplifting of affected communities. The collections were directed towards a nationwide ration distribution campaign called Ramzan Dastarkhwan. 7,000 deserving families were identified and provided with ration packs comprising staple grocery items to last a month for a family of 5 persons on average. These ration packs were distributed by the courtesy of PTCL Razakaars and our collaborating partners, AlKhidmat, Saylani, and Akhuwat Foundation. 30 cities were covered in all provinces of Pakistan including Azad-Jammu Kashmir and Gilgit-Baltistan.

Mentoring Experia Interns

Number of Beneficiaries: **14 Experia Interns**
Number of Volunteer Hours: **37**

In the third quarter, our Razakaars mentored the 2020 batch of Experia Interns in developing digital webinar modules on a series of professional development topics, including: Creating an Impressive LinkedIn Profile, Preparing for Job Interviews, Networking, Resilience and Motivation, Digital Learning, Money Management, and Working Smart. The aim was to orient young graduates on the profound shift towards digital mediums for sharing knowledge.

Webinars for A Cause

Number of Beneficiaries: **160**
Number of Volunteer Hours: **40**

In the last quarter, our Razakaars took the Webinars for a Cause initiative forward and hosted webinar sessions for young graduates from non-affluent backgrounds on critical personal and professional development skills that they miss out on during their university experience. The audience included a mix of regular people and PWDs and was approached in partnership with multiple start-ups working to uplift this under-resourced segment of society.

Disaster Response

When the COVID-19 pandemic took force in Pakistan, PTCL Group recognized its responsibility to help flatten the curve through advocacy and public awareness. The Company collaborated with the IRC on behalf of the Government of Pakistan (GoP) and National Health Emergency Preparedness and Response Network (NHEPRN) to post a series of 11 social media messages on important issues such as social distancing, washing hands repeatedly, and sharing credible information about the virus.

The campaign was run on all social media handles, i.e., Facebook, Instagram, LinkedIn, and Twitter. A 2% engagement rate was received, and our messages reached an estimated audience of 0.6 million.

The Group donated PKR 100 million to PM's COVID-19 Relief Fund. This donation funded cash grants worth PKR 12,000 to more than 8,000 poverty-stricken families across the country.

As a focused humanitarian response to the COVID-19 pandemic, the Group undertook the following salient interventions in addition to those mentioned above:

- Distributed medical kits and grocery items for 250 families at the Sukkur Quarantine Facility. The settlement was the largest quarantine facility in the country at the time and the project was done in collaboration with the district government.

- Donated PKR 1 million to Corona Care Hospital by the Pakistan Red Crescent Society in Rawalpindi. This donation covered the cost of medicines at the hospital which had been established to treat people with the COVID-19 virus.

- Donated PKR 1 million to Shaukat Khanum Research Center for increasing the testing facility of the center.

- Donated 500 Personal Protective Equipment (PPE) kits for front-line workers at the NDMA. The PPE kits included full-body hazmat suits, shoe covers, face shields, gloves, and masks.

Education

Indus Resource Center

Number of Beneficiaries: **553 (249 females, 304 males)**

PTCL has adopted the Din Mohammad Rind and Bugro School run by the Indus Resource Center in Khairpur Sindh. The Company is assisting IRC in running the twin primary schools committed to providing quality education to the local community. The schools have been playing an integral part in promoting education in the vicinity and have shown commitment to girls' education through progressive policies. The schools currently have more than 500 students from KG to Grade 10, 45% of whom are girls.

The Citizen's Foundation Ramzan Campaign

Number of Beneficiaries: **Multiple**

PTCL collaborated with The Citizen's Foundation (TCF) in Ramzan and hosted their ad on its bills. The ad was an aim to collect donations for the provision of quality education to children of impoverished communities studying at TCF schools nationwide.

Learning with Sabaq

Number of Beneficiaries: **Multiple**

PTCL partnered with SABAQ to host a series of letter recognition videos for the Urdu alphabet completely free of cost on Smart TV and Smart TV App. The initiative was a means to make basic education accessible to all regardless of monetary means.

World Wildlife Fund for Nature (WWF)

Number of Beneficiaries: **1,000**

PTCL and WWF collaborated to run a Spellathon for 1,000 primary school students from impoverished schools from Islamabad last year. This year, a similar campaign was run for the Working Folk Grammar School and Khubaib School in Haripur KP. Custom-developed books were created on the theme of environment conservation and the students were oriented on the content and corresponding spellings in the Urdu language. Thereafter, a spelling competition was held, and high achievers were recognized at school-level ceremonies.

Pehli Kiran School Islamabad

Number of Beneficiaries: **120**

PTCL provides an annual internet subscription to 8 campus sites of the Pehli Kiran Schools Islamabad. The connectivity is used for their web-based students and teacher attendance system and helps them in developing relevant reports along with necessary technical expertise.

Environment

MOU with the Ministry of Climate Change

Number of Beneficiaries: **Community**

PTCL expressed its interest to partner with the government on the Clean Green initiative. As per an MoU signed with the Ministry of Climate Change (MoCC), the Company pledged maintenance of three fountains and a park at prominent locations in Islamabad. Almost 1,500 trees have been planted at the PTCL HQs along with 40,000 trees across a multitude of PTCL exchanges.

Smart Rooms at NUST

Number of Beneficiaries: **All students at the NBS**

PTCL collaborated with the NUST Business School to make one classroom and washroom environmentally sustainable through the installation of motion sensor lights, taps as well as insulation for effective temperature control.

Youth Development

Lead To Succeed – Care Foundation

Number of Beneficiaries: **165**
Number of Manhours Expended: **10**

Five PTCL employees from the Central region conducted mentoring sessions with the students of Government Girls Higher Secondary School Singh Pura Lahore and Government Girls High School Harbanspura Lahore.

The program was a structured mentorship program designed to assist students in creating a foundation through opportunities for leadership development, while connecting students to resources, creating unity among all participants, and ultimately supporting the educational and personal success of mentees. The program aimed to enable mentees to discover their inner strengths and the capacities required for them to reach their full potential in life.

Young Leaders Conference - SoL

Number of Beneficiaries: **15 Children of PTCL Employees, 5 PWDs**

PTCL sponsored 15 students to attend the Young Leader's Conference (YLC) – a 6-day residential, rigorous, and thought-provoking leadership training program conducted by the School of Leadership (SoL). The conference with the theme of 'It's Time' was aimed at exposing aspiring young leaders to a diverse audience who can help them in analysing and solving pertinent issues. The theme was driven through Panel Discussions, Team Sessions, Skill Development, Creative Exploration, and Interpersonal Learning.

The Pink Club

Power Yoga Sessions

Number of Beneficiaries: **30**

The Pink Club arranged Power Yoga Sessions for all the female staff at the HQs during Ramzan. The Power Yoga sessions have become an annual tradition that encourages women to set aside some time for themselves and focus on aligning their minds and souls.

Breast Cancer Awareness Month

Number of Beneficiaries: **60**

The Pink Club runs a campaign on Breast Cancer Awareness every year. This year, like the year before, our corporate logo was turned pink on all social media forums to show solidarity to the cause and to show our commitment to raising awareness among our employees, customers, and the society at large.

On internal social media forums, The Pink Club used Workplace to orient female staff on the myths and corresponding facts surrounding Breast Cancer. An in-house awareness session was hosted in collaboration with the Digital Learning team whereby Dr Asma Mahfooz, SMO North along with a gender-balanced panel, presented an excellent discussion around the topic and highlighted employee queries sent specifically for the session.

The month-long campaign ended with a Pink Hi-Tea hosted for Islamabad staff at the PTCL HQs and a digital quiz run for all regional locations so that the knowledge imparted over the month could be assessed amidst fun games.

Health and Safety

Mobile Medical Units

Number of Units: **289**
Number of Beneficiaries: **15,651**

PTCL set up Mobile Medical Health Units whereby vans equipped with medical staff and supplies reached out to underserved communities and provided them with basic medical assistance.

Health Awareness Sessions

Number of Sessions: **495**
Number of Beneficiaries: **19,416**

The Medical Services team at PTCL conducted Health Awareness Sessions for staff and community members on various topics like Breast Cancer Awareness and Polio Vaccination all throughout the year.

Health and Safety

Occupational Health and Safety (OH&S)

PTCL Group promotes high standards within health and safety to ensure a healthy and safe working environment. Adhering to sustainable business practices is crucial to maintaining safety both for our employees and for society at large. Our OH&S Manual meeting ISO 45001 Standard requirements has been implemented: besides, OH&S is also integral part of other PTCL Group's Governance framework documents. Scope of OH&S Manual includes all employees, in-house contractors, core and access network locations, corporate locations including all offices, Joint Shops, contact centers, health centers, training centers, etc., and fleet vehicles. All employees and in-house contractors are required to adhere to health and safety procedures and instructions and report any accident or near-miss on incident portal. Due to regular budget allocation by respective GCXO against HSE objective, there has been a significant reduction in OH&S accidents of PTCL employees and in-house contractors. HSE Objectives completed during last 3 years are reflected below.

Admin/HR/Training/EHS.
- Regular auction of junk material
- 19,781 workers given awareness; 1,649 workers given training, 49 disciplinary actions
- 732 inspections, 197 incident investigations, 211 advisories
- Developing OH&S Manual as per ISO 45001 standard
- Pandemic risk mitigation

Technology
- Fire detection suppression system compliance in projects of Data Centers
- Fire extinguishers for Tier-3 (343)
- Fire wardens manning in Tier-1 (12)
- Maintenance agreement for fire extinguishers
- Consultant's agreement for assessment of dangerous towers and dismantling

Business
- PPE procurement PKR 193 M ensuring compliance with Class 0 Standards
- Toolbox talk program
- Brochures, posters distribution in exchanges

HSE function has a pool of Certified Lead auditors (ISO 45001:2018, ISO 22301:2019) in the three Zones. They conduct regular monitoring activities and keep track of inspection findings closure. Extended team in respective functions of Operations in three Zones and HQ closely work on risk reduction. HSE function also ensures that severe and major risks are identified and regularly followed-up with respective GCXO for implementation.

Training and awareness programs are also regularly conducted. All OH&S content is developed in-house by HSE function and Training function rolls out the programs. Toolbox talks for workers are regularly conducted in the morning by HSE and Training function in the exchanges. However, due to COVID-19 requiring workers to avoid gathering in exchanges, mobile phone app was introduced and successfully rolled out during 2020. During 2021, another mobile phone app for Technology Operations is being rolled out.


	2020	2019	2018
Workers Participated in Awareness Programs	11,580	7381	820
Employees Participated in Formal HSE Training	696	816	137
OH&S Inspections	389	213	130
Incident Investigations	61	72	64
Disciplinary Actions	32	17	00
Advisories Issued	115	96	00

PTCL				Ufone			
Working Hours	2020	2019	2018	Working Hours	2020	2019	2018
Employees	31,123,200	31,392,000	31,685,760	Employees	5,839,680	6,333,888	5,708,736

HSE function also has a pivotal role in standardization of OH&S related procurement and compliance with applicable standard, e.g., PPE, active and passive fire protection, construction of emergency exits, stability analysis of structures, etc. HSE function also ensures that in new development and renovation projects, OH&S requirements are incorporated in SOW and Technical specifications. GSM tracking devices (Utrack) have also been successfully implemented by Administration function to monitor the driving violations. HSE function also ensures regular communication with workers through Workplace portal, HR bulletins, brochures, posters, magazines, etc. Annual objectives are also made part of score cards of respective functions. With consolidation of functions, scope of our OH&S Manual is also being reviewed with Ufone.

During COVID-19 pandemic, HSE function carried out monitoring of COVID-19 instructions issued by Administration function and collaborated with Administration function in reviewing the effectiveness of controls.
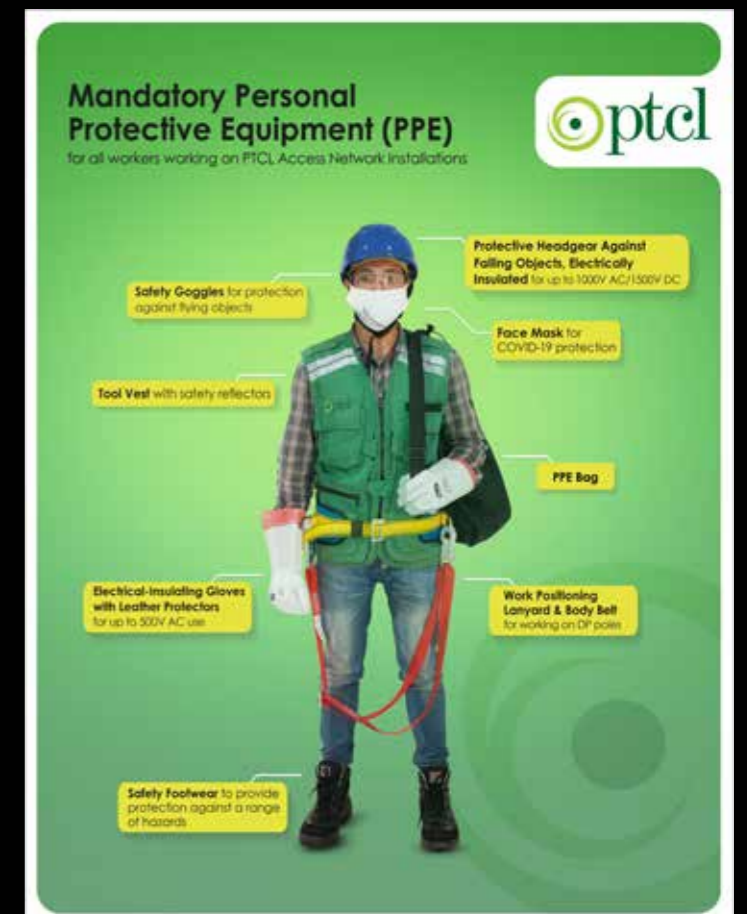
Employee Wellness
and Wellbeing

PTCL management has taken the responsibility of medical health of their employees/pensioners and their families and provides them with appropriate medical treatment facility. PTCL aims to provide medical facilities to its employees by Mobile Medical Units in far flung areas. During the spark of COVID-19 pandemic, PTCL health care team remained fully functional despite closure of hospital OPDs.

PTCL medical team accelerated its services during COVID-19 pandemic and introduced a hybrid working model for the employees. PTCL established outdoor OPD setup as per COVID-19 SOPs and facilitated all workforce for COVID-19 tests and treatment from panel and non-panel hospitals with full financial support. PTCL provided Personal Protective Equipments (PPE) for the safety of all staff which included hand sanitizer, face masks, thermal scanners, hazmat suits, safety goggles, face shields, and gloves.

Home sampling has been carried out for COVID-19 patients as well as delivery of medicines which was a vital element during the peak of COVID-19. Online OPDs and consultation was initiated. Online awareness sessions were conducted for employees.

Customer Health
and Safety

PTCL, being one of the leading telecommunication service providers, always gives high priority to the health and safety of its valued customers and the community at large that it serves. In line with the core belief and principle of Customer Safety First, PTCL has ensured that its products and services meet health and safety standards.

In all its operations, PTCL keeps in view the proper measures and in line with TDRA guidelines on Non-Ionising Radiation Limits for Telecommunication Networks, which are in line with ICNIRP (International Commission of Nonionizing Radiation Protection) guidelines in terms of Specific Absorption Rate (SAR). The compliance and EME documents are communicated to all staff and vendors and followed throughout installations. PTCL is committed to the rules of safety first and manages staff training from time to time to abide by the rules. We also keep the customers updated about safety and handling requirements while using all services and products.

Environmental
Management

Our Ambition

The local energy landscape of Pakistan is unique in terms of the gap between electricity supply and demand; therefore, chronic Grid Power shutdowns are endemic to this region. To ensure Business Continuity, Telecommunication Operators have to rely on sources of backup power, which harm the climate either by contributing directly towards greenhouse gas emissions or through increased wastage and pollutants.

Telecom is an inherently energy-intensive industry and operating in such circumstances further increases our responsibility in playing an active role towards the betterment of the environment. We at PTCL Group realize this and remain committed to protecting the environment and playing our role in fighting climate change. We undertake concerted efforts and focus on minimizing our Carbon Footprint and increasing our efficiencies to obtain more from less: Less Energy, Less Carbon and Less Wastage.

We strongly believe that the use of modern eco-friendly technologies and greener sources of energy will not only help us achieve the efficiencies we target but also play a major role in the reduction of carbon emissions and hazardous pollutants. Additionally, these measures will facilitate sustainable operations and help us handle cost pressures driven by inflation. Therefore, PTCL Group stands committed to promote environment-friendly technologies and to contribute to the betterment of our planet.

Material Issues Covered

1. Mitigation of greenhouse gas emissions through reduced fuel consumption and greater reliance on energy storage solutions

2. Optimizing network energy consumption through the deployment of power-saving solutions and features, equipment and space consolidation and equipment modernization

3. Increased reliance on renewable energy sources

4. Reduction of waste and environmental pollutants generated by energy storage solutions

Climate Change and
Energy Management

Highlights from 2020

In the year 2020, through various measures and initiatives undertaken under the ambit of Environmental Management, PTCL Group has managed to:

- Reduce fuel consumption of the network by **1,595,329 liters**
- Rejuvenate and reuse a sizable quantity of depleted **battery cells**
- Expand footprint of energy efficient **FTTH network**
- Generate **1.49 gigawatt hours** of energy through solar power solutions

To minimize reliance on distributed on-site power generation through fossil fuels, PTCL Group has deployed high-capacity specialized battery solutions, wherever feasible, to serve as active sources of backup power during grid failures.

Greenhouse Gas Emissions:

PTCL

Year	Energy Consumption from Non-Renewable Sources (GJ)	Energy Consumption from Renewable Sources (GJ)	Total Energy Consumption (GJ)	Total GHG Emissions (Metric Tons)
2020	657,615	24,714	682,329	132,560
2019	681,550	20,498	702,048	137,708
2018	705,321	13,006	718,327	143,122

Ufone

Year	Energy Consumption from Non-Renewable Sources (GJ)	Energy Consumption from Renewable Sources (GJ)	Total Energy Consumption (GJ)	Total GHG Emissions (Metric Tons)
2020	954,207	17,851	972,058	203,422
2019	910,434	16,689	927,123	195,453
2018	927,757	14,304	942,061	200,063

Ufone

Despite increasing energy demands driven by growing network size and increasing technology footprints, **Ufone** has managed to deliver **year-on-year improvement in network fuel consumption,** thereby consistently improving CO_2 emissions from the network.

These optimizations are largely driven by an increase in the utilization of energy storage solutions as the primary source of backup power in the Radio Access Network and **reducing reliance on diesel generators as sources of backup power.**

The largest enabler of this shift has been the deployment of specialized battery backup solutions including:

- Lithium-Ion Batteries
- High Autonomy Deep Discharge Batteries
- Cost-Effective Multi-tiered Battery Backup Solutions
- Fast Charging Batteries

Optimizing Network Energy Consumption:
PTCL

Fiber optic-based networks are innately more energy efficient in comparison to copper cable systems and reduce overall network energy consumption significantly. PTCL has been increasing its FTTH footprint year on year. A **sizeable increase in FTTH footprint** was seen in 2020 and we have plans in place to build on this momentum in the coming years. The current install base of FTTH lines has enabled PTCL to **optimize energy consumption** while reducing CO_2 emissions.

Additionally, multiple smaller measures like **equipment consolidation and optimization** of cooling solutions also help us to reduce an additional **3.07 gigawatt hours** of electricity consumption.

Ufone

Increasing network size and growing technology footprints increase the energy requirements of the network. Further, as we reduce our reliance on diesel generators and opt to rely more on energy storage solutions, our dependence on commercial grid power also increases. In spite of this, **Ufone, has largely managed to maintain utilization of grid power, while continuously optimizing fuel utilization.** The trend of network grid power consumption is witness to the efforts that have been put in to optimize network energy consumption.

In a major achievement, results from a recent exercise carried out by **GSMA to benchmark energy consumption across 31 different operators in 28 countries** has ranked Ufone as the best operator in terms of **'RAN Energy Consumption per site'**, the **second best in terms of 'RAN Energy Consumption per subscriber'** and the **fourth best in terms of 'RAN Energy Consumption per Traffic unit'.**

Key measures enabling optimization of energy consumed by the Network are as follows:
- Replacement of Legacy Equipment with Modernized Energy Efficient products
- Use of feature Suites to optimize equipment loads during Off-Peak hours
- Use of Free Cooling and Indoor to Outdoor conversions to optimize of cooling load

Use of Renewable Sources of Energy
PTCL

In the last five years, **solar power solutions with a combined capacity of over 5 megawatt** have been deployed on multiple small exchanges and wireless BTS sites within the PTCL network. These solutions have generated approximately 6.8 gigawatt hours of electricity in 2020 and helped us significantly eliminate GHG emissions.

Grid-tied solar power plant has also been deployed at the PTCL HQs building in Islamabad. This solution has generated 245,000 kilowatt hours of green energy in 2020 while improving PTCL's carbon footprint.

A similar project has been undertaken with the intent to deploy **11.3 megawatts of grid-tied solar solutions on multiple sites**. Once completed, this project shall produce **15.468 gigawatt hours of clean energy.**

Ufone

Ufone has always been an advocate of clean and green sources of power, and we have been investing increasingly in solar power solutions in areas where the climate and weather patterns permit solar to be a feasible source of energy.

Especially in remote areas of southern and western Pakistan, solar irradiance, the paucity of rainy days, and the scarcity of quality grid power make for the perfect conditions for deployment of solar solutions.

Reduction of Wastage and Environmental Pollutants
Ufone

As efforts to optimize carbon footprint and minimize diesel generator operation increase, energy storage becomes increasingly important. However, due to their short cyclic life, **traditional energy storage solutions need to be replaced relatively quickly** after cyclic usage.

The most commonly used type of battery in the telecommunication industry of Pakistan is Valve Regulated Lead Acid (VRLA) battery. The single biggest **environmental issue with VRLA batteries involves the lead component** of the battery, which can contribute to **air and water pollution when disposed** of improperly.

To **reduce wastage and environmental pollution** from VRLA batteries, we have started **rejuvenating and reusing depleted VRLA batteries** within the network since 2018, significantly reducing wastage.
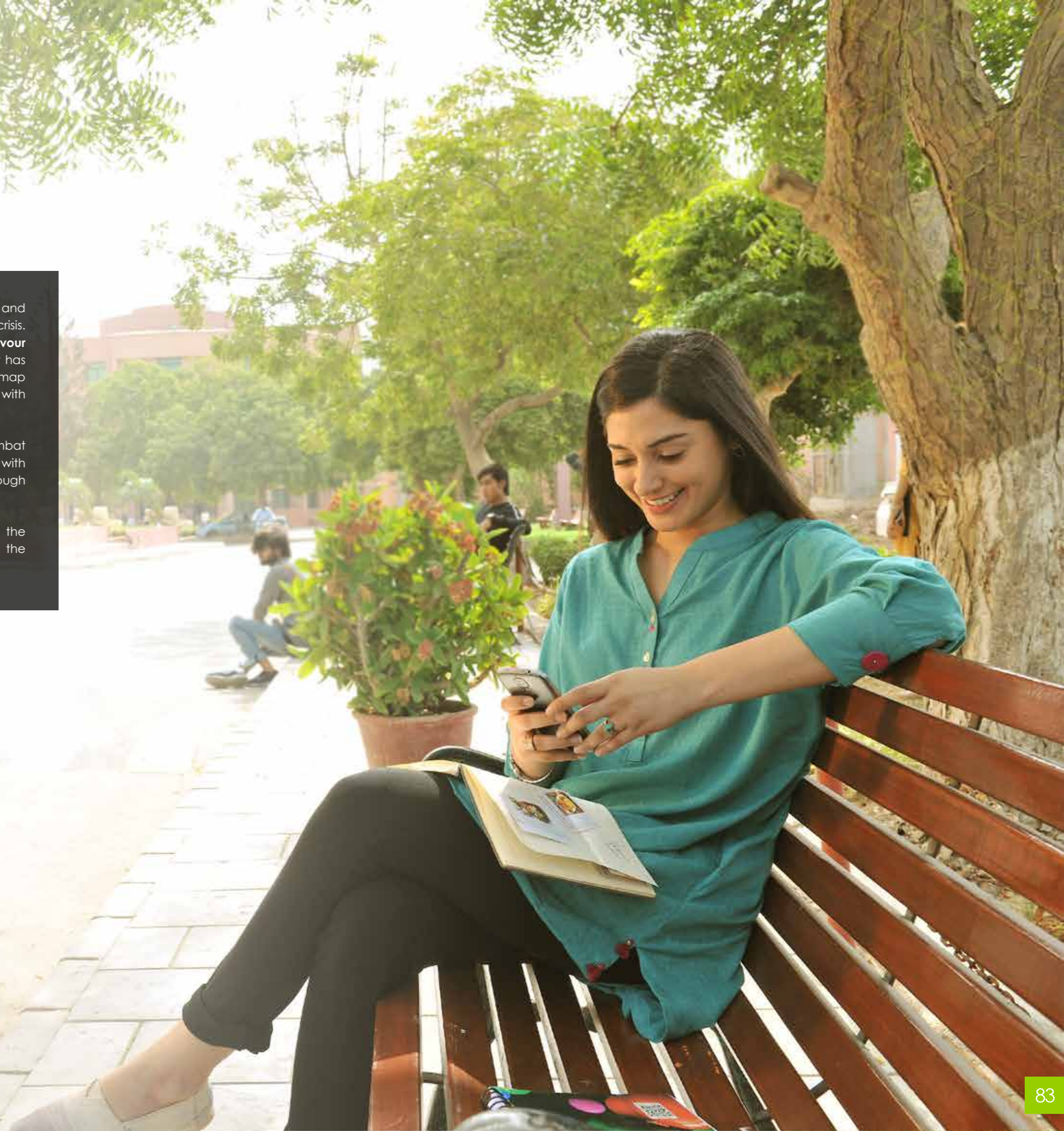
Additionally, to further reduce the environmental impact of energy storage solutions used in our network, we at Ufone have started opting for **lithium-ion batteries as the favoured choice** on new sites. These batteries have a **significantly longer cyclic life** and replacement is not mandated as often as it is with VRLA batteries. Further, **lithium, unlike lead, is not a toxic heavy metal**. We have shifted from VRLA batteries to lithium-ion batteries on over 10% of our base station sites.

Climate Action
Program

Climate change is one of the greatest threats humanity has ever faced and the telecom industry has a big part to play in fighting this global crisis. **Considering that customers, investors and governments all favour companies that have a climate impact agenda,** the telecom sector has worked collaboratively to create an industry-wide climate action roadmap to achieve net-zero greenhouse gas (GHG) emissions by 2050, in line with the Paris Agreement.

Etisalat Group as a leading brand is joining the global efforts to combat climate change and global warming and is demonstrating alignment with the latest thinking and industry discourse on climate action through collaborations with associations including GSMA.

A climate action program for Etisalat Group is being launched by the Etisalat International Technology team and will be integrated with the Etisalat Sustainability program under group governance.

Appendix A
Report Scope & Boundaries

Completeness and aspect boundaries	PTCL has attempted to make this report as complete as possible. This report covers major activities from the PTCL - Departments, and include activities undertaken by its branches.
Materiality	PTCL believes this report covers the most material issues to PTCL and its stakeholders. In alignment with the principles of the GRI standards, PTCL's materiality assessment consists of four steps: 1) identifying relevant topics; 2) prioritising topics according to impact on PTCL and its stakeholders; 3) validating the prioritised topics through reviews and evaluations; 4) review its materiality matrix on an annual basis.
Stakeholder inclusiveness	PTCL has identified and considered all key stakeholders and has outlined ways that the company engages with them to identify their needs and priorities.
Sustainability context	PTCL has considered regional trends in sustainability that affect its activities.
Reporting cycle	This report covers the calendar year for 2020.
Balance	This report seeks to demonstrate transparency, presenting our performance in economic, social, and environmental topics in a balanced way.
Comparability	Comparisons are made throughout the report against 2018 and 2019.
Accuracy and reliability	To the best of PTCL's ability, all the information presented in this report is accurate and represents the best data available to the company and its stakeholders.
Clarity	This report targets a wide audience with varying degrees of understanding of telecommunications and technology. Therefore, PTCL strived to ensure this report is easily understandable to all anticipated readers.
Assurance	The report has not been externally audited or assured.

Appendix B
GRI Standard Content Index

GRI Standard	Disclosure	Page number(s) and/or direct answers
	Organizational profile	
GRI 101: Foundation 2016	102-1 Name of the organization	PTCL
	102-2 Activities, brands, products, and services	8-9
	102-3 Location of headquarters	Islamabad, Pakistan
	102-4 Location of operations	8
	102-5 Ownership and legal form	8
	102-6 Markets served	8
	102-7 Scale of the organization	8
	102-8 Information on employees and other workers	52-54
	102-9 Supply chain	45-47
	102-10 Significant changes to the organization and its supply chain	46-47
	102-11 Precautionary principle or approach	43-44
	102-12 External initiatives	64-75
	102-13 Membership of associations	09
	Strategy	
GRI 102: General Disclosures 2016	102-14 Statement from senior decision-maker	4-7
	102-15 Key impacts, risks, and opportunities	4-7, 43-44
	Ethics and integrity	
	102-16 Values, principles, standards, and norms of behaviour	8-9
	102-17 Mechanisms for advice and concerns about ethics	39-43
	Governance	
	102-18 Governance structure	35-38
	102-19 Delegating authority	35-38
	102-20 Executive-level responsibility for economic, environmental, and social topics	35-38
	102-21 Consulting stakeholders on economic, environmental, and social topics	35-38
	102-22 Composition of the highest governance body and its committees	35-38
	102-23 Chair of the highest governance body	35-38
	102-24 Nominating and selecting the highest governance body	35-38
	102-25 Conflicts of interest	35-38
	102-26 Role of highest governance body in setting purpose, values, and strategy	35-38

GRI Standard	Disclosure	Page number(s) and/or direct answers
	102-30 Effectiveness of risk management processes	43-44
	102-35 Remuneration policies	38
	102-36 Process for determining remuneration	38
	102-37 Stakeholders' involvement in remuneration	38
	Stakeholder engagement	
	102-40 List of stakeholder groups	10-11
	102-42 Identifying and selecting stakeholders	10-11
	102-43 Approach to stakeholder engagement	10-11
	102-44 Key topics and concerns raised	10-11
	Reporting practice	
	102-45 Entities included in the consolidated financial statements	30-34
	102-46 Defining report content and topic boundaries	Appendix A
	102-47 List of material topics	11
	102-48 Restatements of information	N/A
	102-49 Changes in reporting	N/A
	102-50 Reporting period	2020
	102-51 Date of the most recent report	N/A
	102-52 Reporting cycle	Annual
	102-53 Contact point for questions regarding the report	2
	102-54 Claims of reporting in accordance with the GRI Standards	2
	102-55 GRI content index	85
	102-56 External assurance	Not Assured
Material Topics		
GRI 200: Economic	**Economic**	
GRI 103: Management Approach 2016	103-1 Explanation of the Material Topic and its Boundary	11, 30-34
	103-2 The Management Approach and its Components	11, 30-34
	103-3 Evaluation of the Management Approach	11, 30-34

GRI Standard	Disclosure	Page number(s) and/or direct answers
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	30-34
	201-2 Financial implication and other risk and oppurtunity due to climate change	82
	Procurement practices	
GRI 103: Management Approach 2016	103-1 Explanation of the Material Topic and its Boundary	11, 45-48
	103-2 The Management Approach and its Components	45-48
	103-3 Evaluation of the Management Approach	45-48
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	45-48
	Anti-corruption	
GRI 103: Management Approach 2016	103-1 Explanation of the Material Topic and its Boundary	11, 41
	103-2 The Management Approach and its Components	41
	103-3 Evaluation of the Management Approach	41
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	39-44
	205-2 Communication and training about anti-corruption policies and procedures	39-44
	205-3 Confirmed incidents of corruption and actions taken	39-44
	Anti-competitive behaviour	
GRI 103: Management Approach 2016	103-1 Explanation of the Material Topic and its Boundary	11, 41
	103-2 The Management Approach and its Components	41
	103-3 Evaluation of the Management Approach	41
GRI 206: Anti-competitive Behaviour 2016	206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	39-41

GRI Standard	Disclosure		Page number(s) and/or direct answers
GRI 207: Tax 2019	**GRI 103-1**	Explanation of the Material Topic and its boundaries	11, 34
	GRI 103-2	The Management Approach and its Components	34
	GRI 103-3	Evaluation of the Management Approach	34
	Disclosure 207-1	Approach to tax	34
	Disclosure 207-3	Stakeholder engagement and management of concerns	34
GRI 300: Environmental	**Material**		
GRI 103: Management Approach 2016	**103-1**	Explanation of the Material Topic and its Boundary	11, 76
	103-2	The Management Approach and its Components	76
	103-3	Evaluation of the Management Approach	76
GRI 301: Materials 2016	**301-2**	Recycled input materials used	76-81
	Energy		
GRI 103: Management Approach 2016	**103-1**	Explanation of the Material Topic and its Boundary	11, 76-81
	103-2	The Management Approach and its Components	76-81
	103-3	Evaluation of the Management Approach	76-81
GRI 302: Energy 2016	**302-1**	Energy consumption within the organization	76-81
	302-4	Reduction of energy consumption	76-81
	Emissions		
GRI 103: Management Approach 2016	**103-1**	Explanation of the Material Topic and its Boundary	11, 76-81
	103-2	The Management Approach and its Components	76-81
	103-3	Evaluation of the Management Approach	76-81

GRI Standard	Disclosure		Page number(s) and/or direct answers
GRI 305: Emissions 2016	**305-1**	Direct (scope 1) GHG emissions	76-81
	305-5	Reduction of GHG emissions	76-81
	Waste 2020		
GRI 103: Management Approach 2016	**103-1**	Explanation of the Material Topic and its Boundary	81
	103-2	The Management Approach and its Components	81
	103-3	Evaluation of the Management Approach	81
GRI 306: Waste 2020	**306-1**	Waste generation and significant waste-related impacts	81
	306-2	Management of significant waste-related impacts	81
	306-3	Waste generated	81
	306-4	Waste diverted from disposal	81
GRI 400: Social	**Employment 2016**		
GRI 103: Management Approach 2016	**103-1**	Explanation of the Material Topic and its Boundary	11, 50-63
	103-2	The Management Approach and its Components	50-63
	103-3	Evaluation of the Management Approach	50-63
GRI 401: Employment 2016	**401-1**	New employee hires and employee turnover	52-55
	401-3	Parental leave	56-57

GRI Standard	Disclosure		Page number(s) and/or direct answers
	Occupational Health and Safety 2018		
GRI 103: Management Approach 2016	**103-1**	Explanation of the Material Topic and its Boundary	11, 72-75
	103-2	The Management Approach and its Components	72-75
	103-3	Evaluation of the Management Approach	72-75
GRI 403: Occupational Health and Safety 2018	**403-1**	Occupational health and safety management system	72-75
	403-2	Hazard identification, risk assessment, and incident investigation	72-75
	403-4	Worker participation, consultation, and communication on occupational health and safety	72-75
	403-5	Worker training on occupational health and safety	72-75
	403-6	Promotion of worker health	72-75
	403-7	Prevention and mitigation of occupational health and safety impacts directly linked to business relationships	72-75
	Training and Education 2016		
GRI 103: Management Approach 2016	**103-1**	Explanation of the Material Topic and its Boundary	11, 57-58
	103-2	The Management Approach and its Components	57-58
	103-3	Evaluation of the Management Approach	57-58
GRI 404: Training and Education 2016	**404-1**	Average hours of training per year per employee	57-58
	404-2	Programs for upgrading employee skills and transition assistance programs	57-58
	404-3	Percentage of employees receiving regular performance and career development reviews	57-58

GRI Standard	Disclosure		Page number(s) and/or direct answers
	Diversity and Equal Opportunity 2016		
GRI 103: Management Approach 2016	**103-1**	Explanation of the Material Topic and its Boundary	11, 62-63
	103-2	The Management Approach and its Components	62-63
	103-3	Evaluation of the Management Approach	62-63
GRI 405: Diversity and Equal Opportunity 2016	**405-1**	Diversity of governance bodies and employees	62-63
	Local Communities 2016		
GRI 103: Management Approach 2016	**103-1**	Explanation of the Material Topic and its Boundary	11, 66-71
	103-2	The Management Approach and its Components	66-71
	103-3	Evaluation of the Management Approach	66-71
GRI 413: Local Communities 2016	**413-1**	Operations with Local Community Engagement, Impact Assessments, And Development Programs	66-71
	Customer Health and Safety		
GRI 103: Management Approach 2016	**103-1**	Explanation of the Material Topic and its Boundary	75
	103-2	The Management Approach and its Components	75
	103-3	Evaluation of the Management Approach	75
GRI 416: Customer Health and Safety 2016	**416-1**	Assessment of the health and safety impacts of product and service categories	75

	Marketing	

GRI 103: Management Approach 2016	103-1	Explanation of the Material Topic and its Boundary	11, 18-19, 24-27
	103-2	The Management Approach and its Components	18-19, 24-27
	103-3	Evaluation of the Management Approach	18-19, 26-27

GRI 417: Marketing and Labelling 2016	417-1	Requirements for product and service information and labelling	18-19
	417-2	Incidents of non-compliance concerning product and service information and labelling	18-19, 24-27

	Customer Privacy	

GRI 103: Management Approach 2016	103-1	Explanation of the Material Topic and its Boundary	11, 20-22
	103-2	The Management Approach and its Components	20-22
	103-3	Evaluation of the Management Approach	20-22

GRI 418: Customer Privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	20-22