SIFY INFINIT SPACES LIMITED

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) POLICY

Sify Infinit Spaces Limited
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Change History

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Distribution list

Name & Title	Purpose
All CXOs	Operationalizing and Adherence
All Business & Operational Heads	Operationalizing and Adherence
All Employees	Operationalizing and Adherence
All Stakeholders	Operationalizing and Adherence

1. POLICY FOUNDATION

1.1 Introduction:

Sify Infinit Spaces Limited ("SISL" or "the Company") is a wholly owned subsidiary of Sify Technologies Limited. SISL provides Data Center (DC) colocation services for all types of clients who are offshoring their data storage portfolio. SISL also provides edge DCs.

SISL recognizes that integrating environmental, social and governance considerations into business strategy and operations is critical to long-term resilience, risk management and value creation.

1.2 Objectives

The company recognizes that integrating environmental, social and governance considerations into its strategy and operations is important for building resilient digital infrastructure and delivering long-term stakeholder value. As our data center footprint expands, we acknowledge our responsibility to manage environmental impacts, contribute positively to the communities in which we operate, and uphold strong governance practices.

Through this ESG Policy, the Company seeks to

- Articulate its commitment to responsible and sustainable business practices, embed ESG principles into decision-making processes,
- Guide employees and partners in managing environmental and social impacts while upholding the highest standards of governance and ethics.

1.3 Scope & Applicability

This Policy applies to:

- Personnel - The Board of Directors, senior leadership, all employees, including permanent, contractual and third-party employees and all other business functions
- Facilities - All operational facilities including data centers and offices
- Affiliations - Subsidiaries, contractors, suppliers and service providers, where relevant

All stakeholders are expected to adhere to the principles outlined in this Policy and related corporate policies.

1.4 Alignment with NGRBC & UN SDGs

SISL's ESG Policy is aligned with the principles of the National Guidelines on Responsible Business Conduct (NGRBC), the United Nations Sustainable Development Goals (UN SDGs) and the Global Reporting Initiative (GRI) framework. The GRI framework is the world's most widely used, modular, and globally recognized standard for sustainability (ESG) reporting. The policy supports the advancement of relevant UN SDG goals including climate action, affordable and clean energy, decent work and economic growth, industry innovation and sustainable communities. The NGRBCs, issued by the Ministry of Corporate Affairs in March 2019, build upon the National Voluntary Guidelines on the Social, Environmental and Economic Responsibilities of Business introduced in 2011 and were subsequently revised to align with the Sustainable Development Goals and the "Respect" pillar of the UN Guiding Principles on Business and Human Rights. In India, the regulatory landscape governing ESG disclosures is supported by the Companies Act, 2013 and the SEBI Regulations, which collectively provide the legislative foundation for responsible business conduct and transparency.

2. GOVERNANCE & OVERSIGHT

2.1 ESG Governance Framework

The Company integrates environmental, social and governance considerations into its strategic planning, enterprise risk management and operational processes, recognizing that sustainable business performance and long-term financial success are intrinsically linked. This approach, supported by a robust governance mechanism, enables the Company to progress toward its ESG commitments while creating positive outcomes for stakeholders, society and the environment.

The Company's internal ESG governance structure is designed to ensure:

- Identification, assessment and monitoring of ESG risks and opportunities
- Effective implementation of sustainability initiatives and responsible business practices
- Periodic review of performance against identified material topics, including appropriate reporting and disclosures

2.2 Ethics & Code of Conduct

The Company upholds the highest standards of integrity, accountability and ethical conduct across all its operations and relationships.

- Maintains and enforces policies and controls to prevent corruption, bribery and unethical practices

- Encourages a culture of fairness, honesty and transparency in all business dealings
- Provides accessible grievance and whistleblower mechanisms to encourage reporting of concerns without fear of retaliation

The Company's Code of Conduct articulates its core values and sets clear expectations for ethical conduct, with all employees expected to uphold these standards and act as ambassadors of responsible business practices.

3. ENVIRONMENTAL

3.1 Environmental Strategy & Commitments

SISL is committed to minimizing its environmental footprint while enabling responsible and sustainable digital infrastructure growth. The Company seeks to decouple business expansion from environmental impact through efficient resource utilization, emissions reduction and adoption of sustainable technologies.

Guided by a precautionary and compliance-driven approach, SISL endeavors to prevent and mitigate potential environmental impacts across its operations by leveraging best available knowledge, continuous improvement and responsible operational practices.

3.2 Climate Change & Decarbonization

SISL recognizes climate change as a key business and operational consideration and is committed to supporting the transition to a low-carbon future. The company has a clear vision of reaching Net Zero commitments and the Decarbonization of our operations. The Company manages climate-related risks and opportunities by:

- Monitoring and progressively managing greenhouse gas emissions across operations by measuring Scope 1 & Scope 2 emissions periodically.
- Driving energy and operational efficiencies to reduce carbon intensity and improve our PUE.
- Strengthening the resilience of infrastructure and systems to climate-related risks.
- Increasing the use of lower-carbon and renewable energy solutions in our energy mix across our facilities to reduce our carbon footprint.

3.3 Waste Management & Circular Economy

SISL is committed to responsible resource management and the reduction of waste generated across its operations. The Company focuses on minimizing waste at source, promoting reuse and recycling, and strengthening circular practices wherever feasible.

The Company ensures that electronic, hazardous and other operational waste streams are handled and disposed of in compliance with applicable regulations, including engagement with authorized recyclers and certified vendors to ensure environmentally sound and responsible disposal.

3.4 Sustainable Infrastructure & Green Buildings

SISL is committed to integrating sustainability principles into the design, construction and operation of its data center infrastructure. The Company focuses on enhancing energy, water and resource efficiency through optimized cooling technologies, environmentally responsible design practices and adherence to applicable environmental standards. The company recognizes water as a critical natural resource and is committed to responsible water management across its operations, particularly in water-intensive infrastructure environments.

As part of its commitment to green infrastructure, SISL continues to pursue and construct our facilities in accordance with **IGBC Green Data Center Platinum Rated** for its new and upcoming facilities, reinforcing its approach to building high-performance, environmentally responsible digital infrastructure.

3.5 Sustainable Procurement & Supplier Engagement

SISL views its suppliers as critical partners in delivering responsible and sustainable outcomes across its value chain. The Company's procurement approach is guided by its Supplier Code of Conduct, which outlines the minimum standards expected from suppliers in areas including labour and human rights, health and safety, environmental management, business integrity, cyber security and diversity.

The Company encourages suppliers and contractors to comply with applicable laws and adopt responsible environmental and ethical practices, including minimizing environmental impacts, promoting safe and fair working conditions, and maintaining high standards of integrity and transparency.

3.6 Integration of Renewable Energy

SISL recognizes the transition to cleaner energy sources as a critical lever in reducing its carbon footprint and advancing climate resilience across its operations. As part of its decarbonization pathway, the Company is progressively increasing the share of renewable energy in its overall energy mix.

The Company shall:

- **Increase Renewable Energy Adoption**

  Actively pursue procurement of renewable power through appropriate mechanisms, including long-term power purchase arrangements and other market-based instruments, where commercially and operationally feasible.

- **Support Energy Transition Goals**

  Align renewable energy integration efforts with national climate commitments and global sustainability frameworks to contribute meaningfully to emissions reduction objectives. Balance business expansion with a progressive shift toward cleaner energy solutions, supporting sustainable digital infrastructure growth.

4. SOCIAL

4.1 Workforce & Human Capital

SISL recognizes its people as a key driver of sustainable growth and operational excellence. The Company is committed to fostering a safe, inclusive and engaging workplace, capability development and equal opportunity, while contributing positively to society and the future digital workforce.

- **Employee Wellbeing & Safety**

The Company prioritizes the health, safety and wellbeing of its workforce by maintaining robust occupational health and safety practices across operations. SISL adopts proactive risk management, continuous monitoring and improvement initiatives to promote a safe working environment and minimize workplace incidents.

- **Diversity, Equity & Inclusion**

SISL is committed to building a diverse and inclusive workplace where every employee is treated with fairness, dignity and respect. The Company promotes equal opportunity for all and does not tolerate any form of discrimination. It strives to build an environment where different perspectives are valued, and every individual is encouraged and empowered to contribute to their full potential.

- **Talent Development & Training**

The Company invests in continuous learning and capability building through training, leadership development and upskilling initiatives. These efforts are aimed at enhancing employee competencies, supporting career growth and strengthening organizational resilience.

- **Human Rights Commitment**

SISL respects internationally recognized human rights and is committed to fair labor practices, non-discrimination and ethical treatment of all employees. The Company promotes a culture of respect and ensures that workplace practices uphold dignity and inclusion.

- **Employee Engagement & Future Talent**

SISL strives to cultivate a culture that encourages participation, collaboration and innovation, enabling employees to thrive and contribute meaningfully to the Company's goals. The Company also supports initiatives that strengthen the future talent pipeline, including programs that encourage skill development and participation in the digital and technology ecosystem.

4.2 Community Engagement & Social Impact

SISL is committed to creating positive social value in the communities in which it operates through responsible business practices and structured corporate social responsibility initiatives. Guided by its CSR framework, the Company supports programs that contribute to inclusive and sustainable development, with a focus on areas such as education, healthcare, environmental sustainability and community wellbeing.

5. GOVERNANCE

5.1 Board Diversity & Independence

SISL maintains a balanced and diverse Board with an appropriate mix of skills, experience and independence to enable objective oversight and effective decision-making. The Board's composition supports strong governance practices and aligns with the Company's commitment to responsible and forward-looking leadership.

5.2 Business Ethics & Integrity

Conducting business with integrity and respect for stakeholders is central to SISL's governance philosophy. The Company promotes a culture grounded in ethical conduct, accountability and transparency, and maintains zero tolerance for corruption, fraud or unethical practices. These principles guide decision-making across all levels of the organization.

5.3 Risk & Internal Controls

SISL integrates risk management into its governance framework through structured processes designed to identify, assess and mitigate operational, financial and ESG-related risks. The Company maintains robust internal control systems and reviews its risk management practices to enhance resilience and ensure business continuity.

5.4 Transparency & Disclosure

The Company is committed to maintaining high standards of transparency through timely, accurate and comprehensive disclosures. SISL reports on its financial and ESG performance in accordance with applicable regulatory requirements and recognized reporting frameworks, reinforcing stakeholder trust and accountability.

6. IMPLEMENTATION & MONITORING

6.1 Monitoring & Review Mechanism

The Company has established structured governance processes to track ESG priorities, with key performance indicators, report on materiality topics and ESG initiatives all are reviewed periodically by senior management and the Board to assess progress, drive accountability, and ensure alignment with strategic objectives.

6.2 ESG Reporting & Disclosures

SISL is committed to transparent communication of its sustainability performance through statutory filings, sustainability and integrated reporting, and ongoing stakeholder engagement in line with applicable regulatory requirements.

Beyond mandatory disclosures, the Company endeavors to adopt a proactive and voluntary approach to ESG reporting, enhancing transparency and accountability ahead of regulatory commitments where feasible. Such disclosures are aligned with recognized reporting frameworks and industry practices, ensuring consistency, accuracy and reliability of information shared with stakeholders.

6.3 Continuous Improvement

The Company endeavors to strengthen its ESG performance through regular benchmarking, incorporation of stakeholder feedback, and adoption of emerging best practices and innovative solutions across operations.

6.4 Policy Review & Amendments

This Policy will be reviewed at defined intervals and updated, where necessary, to reflect evolving regulations, industry standards, and the Company’s strategic priorities.