

BHARTI AIRTEL LIMITED

● Telecommunications Company

Key Findings:

- Bharti Airtel's weak commitments and disclosures related to freedom of expression and privacy could be significantly improved even without any changes being made to India's laws and regulations.
- Bharti Airtel's lack of disclosure about policies related to network shutdowns is of particular concern given that as many as 30 government-ordered internet shutdowns occurred in India in 2016.¹
- The company led its telecommunications peers in offering grievance and remedy mechanisms due to the requirements of Indian law.

OVERALL SCORE

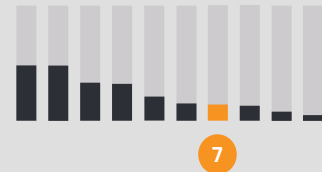
14%

OPERATING COMPANY
EVALUATED

AIRTEL INDIA

India

TELECOMMUNICATIONS RANK



SERVICES EVALUATED

- Pre-Paid Mobile
- Post-Paid Mobile
- Fixed-Line Broadband

ANALYSIS

Bharti Airtel ranked seventh out of the 10 telecommunications companies evaluated and 18th in the Index overall.² In 2016, Freedom House rated the internet environment in India as "partly free," citing the growing frequency of internet shutdowns around the country as a threat to internet users' rights.³ While Bharti Airtel has a corporate social responsibility program that stresses the importance of a "responsible business approach" addressing "every dimension of how business operates in the social, cultural, and economic environment,"⁴ the company demonstrated weak respect for users' freedom of expression and privacy rights.

About Bharti Airtel Limited

Bharti Airtel Limited provides telecommunication systems and services worldwide, including in India, South Asia, and Africa. The group delivers a variety of fixed and mobile voice and data telecommunications services across these markets.

Market Cap: USD 21,343 million⁵

BSE: 532454

Domicile: India

Website: www.airtel.in

¹ "Internet Shutdowns in India," Accessed February 16, 2017, <http://internetshutdowns.in>.

² For Bharti Airtel's performance in the 2015 Index, see: <https://rankingdigitalrights.org/index2015/companies/bhartiairtel>.

³ "Freedom on the Net" (Freedom House, November 2016), <https://freedomhouse.org/report/freedom-net/2016/india>.

⁴ "Sustainability," Airtel India, accessed February 16, 2017, <http://www.airtel.in/sustainability-file/home.html>.

⁵ S&P Capital IQ, Accessed February 13, 2017.



GOVERNANCE 16%

Bharti Airtel performed poorly in the Governance category, placing in the bottom half of all companies evaluated. India's legal environment does not prevent the company from making commitments to respect freedom of expression and privacy in its operating markets (G1), from establishing senior-level oversight over how the company handles freedom of expression and privacy issues (G2), or from creating a process

for human rights due diligence (G4). The company received partial credit for Airtel India's stakeholder engagement but there is no evidence of stakeholder engagement in other markets (G5). Notably, Bharti Airtel tied for first place with Vodafone for grievance and remedy mechanisms (G6). Indian law requires service providers to have grievance officers and redress mechanisms.⁶



FREEDOM OF EXPRESSION 10%

As in the 2015 Index, Bharti Airtel earned the lowest score in the Freedom of Expression category of any telecommunications company.

Content and account restriction requests: Like most telecommunications companies evaluated, Airtel India disclosed nothing about how it handles government and private requests it receives to restrict content or user accounts (F5-F7). Indian law forbids disclosure of government requests to block content, but nothing prevents companies from disclosing their process for handling these types of requests, or from having a clear policy of notifying users when they restrict or block content they publish, transmit, or attempt to access (F8).

Network management and shutdowns: As a result of legal requirements, Airtel India disclosed more information than most of its peers about its network management policies (F9), earning it the third highest score on this indicator. However, the company disclosed little about its policies and practices related to network shutdowns. While Indian law prevents companies from disclosing information about specific government shutdown orders, there is no legal obstacle to disclosing company policies for evaluating and responding to shutdown requests, or from having a policy to notify users about shutdowns (F10).

Identity policy: Airtel India disclosed that it requires pre-paid mobile users to provide a government-issued identification, which is also required by law (F11).⁷



PRIVACY 17%

Bharti Airtel placed seventh out of the 10 telecommunications companies in the Privacy category.

Handling of user information: Airtel India disclosed less than most telecommunications companies about how it handles government and private requests for user information, though it performed better than MTN, Etisalat, and Ooredoo on these indicators (P3-P8). Airtel India offered some disclosure of what types of user information it collects, shares, and why (P3, P4, P5), but did not disclose how long it retains this information (P6). Nor did it disclose whether it enables users to control what information about them is collected and shared, or to obtain the information the company holds about them (P7, P8).

Requests for user information: Like most telecommunications companies, Airtel India disclosed little about how it handles government and private requests for user information (P10-P11). Indian law prevents companies from reporting data on government requests but does not prevent them from disclosing their process for responding to different types of third-party requests for user information.

Security: Airtel India scored above the telecommunications company average on these indicators (P13-P18). But it offered no information about its efforts to address vulnerabilities (P14) and was silent about its process for responding to data breaches (P15). More positively, the company did win full points for its efforts to educate users about security threats (P18).

⁶ "Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011" (Ministry of Communications and Information Technology, April 11, 2011).

⁷ "Subscriber Verification," Department of Telecommunications, <http://www.dot.gov.in/access-services/subscriber-verification>.