



**ADANI PORTS AND SPECIAL ECONOMIC ZONE
LIMITED**

PRINCIPLE-WISE (AS PER NVGs)
BUSINESS RESPONSIBILITY POLICIES

SCOPE

For sustainable development, the management of the Adani Group of Companies (defined as “Group”) will continue its efforts to strike proper balance between economic, social and environmental performance in dealings with various stakeholders of the Group, namely, customers, investors, lenders, deposit holders and the society. The Group will make its best efforts to impress upon other entities in the value chain and its associates to participate in the Business Responsibility initiatives depending upon their means and resources.

» **Principle-1**

To conduct business and govern themselves with ethics, transparency and accountability:

❖ **Policy :**

- i. The Group has developed Code of Conduct and directors, management and employees at all levels will abide to ensure good governance, ethical practices, transparency and accountability in conducting affairs of the Group and dealing with stakeholders across the value chain.
- ii. The Group will conduct periodic training programmes on awareness of code of conduct among its employees and stakeholders.
- iii. The directors, management and employees of the Group will report their compliance to the policy.
- iv. In the Annual report of the Company sent to shareholders, the Managing Director will certify compliance of the Company’s code of conduct by directors and senior management.
- v. The Group’s listed Companies will promptly post on their websites information regarding quarterly, half yearly and annual financial results / statements (standalone as well as consolidated) of the respective companies and its subsidiaries at regular intervals, Notices of general meetings, Intimations of ‘Record-date’, Annual Reports, shareholding patterns and such other information as per Regulation 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and provisions of the Companies Act in such manner that the same is easily accessible to the investors of the Companies. The website will be updated regularly from time to time.

- vi. None of the group companies will engage in practices that are abusive, corrupt, or anti-competitive.
- vii. The Group will avoid complicity with the actions of any third party that violates any of the principles contained in these Guidelines.
- viii. The website will also contain a special window called 'Help-desk' which may be accessed by investors and customers of the Company for redressal of their grievances. The Company has dedicated e-mail id investor.apsezl@adani.com for investor correspondence.

» **Principle-2**

To provide goods and services that are safe and contribute to sustainability throughout their life cycle:

❖ Policy :

At Adani Group, our Sustainability Policy integrates economic progress, social responsibility and environmental concerns with the objective of improving quality of life. We at Adani always believe in integrating our business values and operations to meet the expectations of our customers, employees, partners, investors, communities and public at large.

- The Group will uphold the values of honesty, partnership and fairness in its relationship with stakeholders.
- The Group shall provide and maintain a clean, healthy and safe working environment for employees, customers, partners and the community.
- The Group will strive to consistently enhance its value proposition to the customers and adhere to its promised standards of service delivery.
- The Group will respect the universal declaration of human rights, International Labour Organisation's fundamental conventions on core labour standards and operate as an equal opportunities employer.
- The Group shall encourage and support its partners to adopt responsible business policies, Business Ethics and our Code of Conduct Standards.
- The Group will continue to serve its communities:
 - by implementing sustainable Community Development Programmes including through public/private partnerships in and around the area of operations.

- by encouraging group employees to serve communities by volunteering and by sharing their skills and expertise.
- by striving to deploy sustainable technologies and processes in all its operations and use scarce natural resources efficiently in its facilities.
- the group will also help communities that are affected by natural calamities or untoward incidents, or that are physically challenged.
- by establishing sourcing/ supply chain with emphasis on local procurement.

The Group management will commit all the necessary resources required to meet the goals of Corporate Sustainability.

» **Principle-3 :**

To promote well-being of all employees:

❖ **Policy :**

The Group has migrated from an era of industrial relations to employee relations. It respects the employees' right to freedom of association, participation and collective bargaining. Employees at all levels shall have freedom of association and be free to participate in collective bargaining. Workers participation in Management shall be governed by a well laid down policy framework.

- i. The Group will provide equal opportunity to all employees starting from their recruitment irrespective of their caste, creed, gender, race, religion, and language. The employees of the Group can belong to any part of the country and will be selected based on individual merit without any discrimination or preference.
- ii. The Group will also formulate schemes and policies to address health, superannuation issues and welfare needs of employees and their families.
- iii. The Group will provide workplace environment that is safe, hygienic and which upholds the dignity of the employee.
- iv. The Group will ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities on equal and non-discriminatory basis.
- v. The Group will also provide continuous training to its employees for personal and professional skill developments.

- vi. The Group will promote employee morale and career development through various HR policies.
- vii. The Group will frame stringent policies and practices to ensure that the employees especially female employees do not suffer harassment and create the environment where they feel safe and secure in discharging their responsibilities.
- viii. The Group will not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- ix. The Group will take cognizance of the work-life balance of its employees, especially that of women
- x. The Group focuses on learning and development, to enhance the knowledge & skill and preparing its people to face challenges.
- xi. To take various initiatives to maintain its position as leading integrated infrastructure conglomerate in the Country, viz., Talent pool to match Organisational growth, creating a performance culture, encouraging learning element across organisation etc.

» **Principle-4**

To respect the interest of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalised

❖ **Policy :**

The Group's key stakeholders include employees, suppliers, customers, business associates, investors, regulatory agencies and local communities around its sites of operations. Our Investors comprise of shareholders (including Institutional Investors).

The Group values the support of its stakeholders and respects the interests and concerns they have towards it. The Group and its employees shall provide value based services to all the stakeholders.

The Group has continuous engagement with its various stakeholders to understand their concerns and assess their requirements and respond to their needs in an effective manner.



- i. The Group endeavours to enhance stakeholder value by addressing the diverse interests of various stakeholders including but not confined to shareholders, consumers, customers, employees, business partners, local community, Government and the general public.
- ii. The Group, through its CSR arm – Adani Foundation and its partnering organisations focuses on catering to the needs of common people and especially of marginalised group.
- iii. To undertake several initiatives to engage with and ensure sustainable development of the marginalised groups in the local communities around its sites of operations.
- iv. The employees of the Group/ Adani Foundation will offer assistance, encouragement and service to the customers in fair, equitable and consistent manner.
- v. The Group gives special attention to stakeholders from under-developed areas of operations. As a part of Corporate Social Responsibility, the Group will provide:
 - (a) Education: “Enhancing the Quality of Primary Education”
 - (b) Health: “Enhancing Preventive and Primary Care”
 - (c) Sustainable Livelihood: “Enhancing Socio-Economic Stature”
 - (d) Rural Infrastructure: “Enhancing Rural Civic Amenities”

» **Principle-5**

To respect and promote human rights

❖ **Policy :**

Background

Adani Group is committed to upholding of fundamental human rights in line with the legitimate role of business. Our approach includes adherence to corporate business policies and compliance with applicable laws including internationally recognised human rights, as set out in the International Bill of Human Rights and the International Labour Organisation’s declaration on Fundamental Principles and Rights at Work.

Purpose/Objectives

To provide guidelines for common understanding and ensuring adherence in the Group.

Scope

This policy applies to all direct employees, consultants (including fixed term appointees), associates, trainees, suppliers, vendors, etc. in all companies/businesses of the Group.

The following guidelines shall be observed by the Group in its business processes:

- i. Conduct business in a manner that respects the rights and dignity of all people, complying with all legal requirements.
- ii. Recognise our responsibility to respect human rights and avoid complicity in human rights abuses.
- iii. Treat everyone who works for Adani Group fairly and without discrimination. Employees, agency staff, vendors, customers and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- iv. Respect the rights of people in communities impacted by our activities. We will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimise and/or mitigate them.
- v. The Group will, within its sphere of influence, promote the awareness and realisation of human rights across its value chain.
- vi. Ensure compliance and adherence to all the applicable human rights laws and national laws. The Group's policies strive to percolate these values at all levels in the organisation.

» **Principle-7**

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

❖ **Policy :**

The Group interacts with Government/ Regulatory Authorities on public policy frameworks.

- i. The Group while pursuing advocacy policy, ensures that their advocacy positions are consistent with the principles and core elements contained in this policy enhancing business responsibility and transparency.

- ii. To the extent possible, the Group utilises the trade and industry chambers and associations and other such collective platforms to undertake such advocacy policy.
- iii. To use Code of Conduct as a guide for its actions in influencing public and regulatory policy.

» **Principle-8**

Businesses should support inclusive growth and equitable development

❖ **Policy :**

The Group is committed to establishing competitive and sustainable value chains linked to the businesses which create sustainable livelihoods, especially among the poor in rural India.

Adani Foundation and its partnering organisations are investing the resources of Adani Group to support inclusive growth and equitable development in and around its businesses as well as towards Nation Building at large.

CSR Vision is to accomplish passionate commitment to the Social obligation towards communities, fostering sustainable and integrated development, thus improving quality of life.

For inclusive growth and equitable development, Adani Foundation focuses on following sectors:

- Primary Education- Aim is to enhance the quality of Primary education leading to “Ignited Minds for Brighter Future”.
- Health Care- Aim is to enhance the Preventive and Primary health care leading to “Ignited Minds for a Healthy Live”.
- Sustainable Livelihood Development- Aim is to enhance socio-economic stature of women, youth and other marginalised groups and optimising Natural Resource Management leading to “Ignited Minds for Empowered Life”.
- Rural Infrastructure Development – Aim is to enhance Rural Civic Amenities by bridging gap not duplicating efforts leading to “Ignited Minds for Better Living”.



» Principle-9

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

❖ **Policy :**

The Adani Group is committed to continuously exceed customer expectations, in pursuit of its aim to be the most admired organisation of the Country.

The customer satisfaction is the key to our growth and success in this line of business. The Group strives hard to provide better services to customers at large.

- i. The Group will serve the needs of its customers taking into account the overall well-being of the customers and that of society.
- ii. The Group will promote and advertise its services in ways that do not mislead or confuse the consumers or violate any of the principles in this policy.
- iii. The Group will provide adequate training to employees continuously to meet the challenges of a dynamic business environment and will also provide adequate grievance handling mechanisms to address customers concerns and feedback.
- iv. The Group will maintain privacy of consumer's confidential data in the normal course of its business.
