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|  | Diversity, Equity and Inclusion Guidelines | Document: | HR - DEIG |
| | | Issue Date: | 16 March 2022 |
| | | Version: | 1.2 |
| Adani Ports and Special Economic Zone (APSEZ) | | | |

Context & background

One of the most prominent aspects of creating aspiring workplaces is building, nurturing & leveraging strengths of diversity, equity & inclusion of workforce members in holistic manner. Organization's which are able to inculcate DEI (Diversity, Equity and Inclusion) as part of their work culture are able to develop commitment & trust of workforce members more than others. Such entities provide equitable space to every member to use their ingenuities and abilities in best interest of organization.

These guidelines are part of broader framework of Adani Ports & Special Economic Zone Ltd (APSEZ). It reflects organization's zero tolerance for ascribing stigma and / or discrimination of any kind because of differences of any type to any member of society.

Definitions

Diversity entails overall representation or the make-up of an entity. **Equity** aims to ensure the fair treatment, access, equality of opportunity and advancement for everyone. **Inclusion** refers to how well perspectives and contributions of varied groups of people are valued and integrated in an environment.

An organization consists of people coming with varied thoughts, capabilities, personality, and talent which they bring to work. Workplace diversity translates to variety of differences among people in an organization. It is about being aware that individuals are unique in their own

way so that every individual feels respected and included. APSEZ welcomes and assimilates people with differences including but not limited to nationality, geography, gender, age, ethnicity, sexual orientation, physical abilities, religious beliefs, family status, perspectives or other ideologies.


Approach

APSEZ (and its entities) is committed to provide equality of access towards employment, advancement and retention within organization, recognizing that it is in organization's interest to recruit and maintain a diverse and skilled workforce that is representative of diverse nature of society. Organization is committed towards continuously developing a workplace culture based on fair practices, which safeguards rights of employees so that they are treated with respect and dignity and enjoy equal rights, terms and conditions of employment.



Every member of APSEZ workforce is expected to contribute in creating and sustaining an inclusive workplace culture.

APSEZ is continuously striving to be an equitable workplace promoting pay parity, skill balancing, inclusive culture and diverse demography.

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Scope

This policy applies to all employees, contractors, partners, and stakeholders associated with the APSEZ. It is intended to ensure a culture of respect, fairness, and meaningful inclusion for all, regardless of age, ethnicity, gender, race, nationality, religion, disability, sexual orientation, or any other protected characteristic.




Guidelines and Operative Provisions:

- APSEZ's DEI vision is to create a sustainable workplace culture where teams of mixed ethnicity, regional affiliations, physical ability, age, education and domicile are representative of a variety of perspectives and experiences. Organization has a culture where everyone feels included and respected.
- Diversity, Equity & Inclusion Council* of APSEZ owns and implements DEI initiatives. The role of council is to place thrust and momentum across the organization to progress the imperatives.
- Senior leaders support the cause of diversity at various forums, through participation and by leading from front on diversity, equity, and inclusion related events. Inculcate the principles of DEI in all its stakeholders such as Vendors, Partners, Contractors, etc.
- APSEZ is an equal opportunity employer and extend right of equal opportunity for differently abled employees. Based on demonstrated contribution and potential, employees are provided with opportunities of growth and learning. Organization shall provide necessary facilities, amenities and training for enabling its employees to effectively discharge their duties for which they are employed.
- Training Need Identification (TNI)* process for employees is carried in consideration of their special requirements & context. Fulfillment of their generic, special, or unique needs is through nomination to a program meant to address these requirements.
- Success of DEI is ensured by leaders so that diverse employees are actively engaged in work environment without any biases. APSEZ continuously works towards fostering an environment where employees of diverse background are nurtured, mentored, and coached to develop their potential as future leaders.
- Sensitization:** APSEZ organizes sessions for management cadre to help them leverage the potential of a diverse workplace and employ an inclusive approach in their business dealings.

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8. Mentoring Program at APSEZ is aimed at developing high potential executives for leadership roles by leveraging experience of senior personnel of organization. The program aims towards fostering diversity by selecting mentees from different background, nationality, caste, creed, gender, age, religious beliefs, family status, perspectives, or other ideologies.
9. Focused efforts are made towards onboarding & assimilation of employees into the organization in minimum possible time. In depth customized modules are imparted to every new entrant to enable cultural assimilation and eco system acceptability.
10. APSEZ carries out series of sessions on Diversity Intelligence aimed at covering people managers across organization with an objective to improve diversity management capabilities. These sessions reinforce how diversity, personality, and cultural differences play out in the workplace. Increasing awareness, and thereby removing barriers, enables employees to contribute their best and fosters team spirit to value each member's contribution.
11. A conscious effort is made to attract applicants from different diversity dimension groups to achieve and maintain a workforce that reflects diversity across levels and functions. High potential talent from different backgrounds is provided with developmental opportunities.
12. Equal Employment Opportunity: To achieve our business objectives, APSEZ is committed to a merit-based appointment process. APSEZ has guidelines and practices in place which provide access to all opportunities available with the organization to all capable and diverse employees, in a fair and equitable manner. *Careers Within* program of the organization provides information, access and opportunities to internal talent against all vacancies within the organization on equal platform.

APSEZ recruit, retain and promote highly talented individuals without any discrimination based on their gender, age, disability, ethnicity, sexual orientation, family status, nationality and religious beliefs.
13. APSEZ is committed to eliminating all forms of unlawful discrimination, harassment, bullying and victimization of persons at its workplaces. The organization maintains a workplace where all employees and associates work without fear of unacceptable workplace conduct impacting them.
14. APSEZ is committed to providing a healthy and safe workplace to all its employees and associates.
15. APSEZ takes utmost care in ensuring that job design and classification are unbiased. Organization reviews job requirements, classifications, and compensation systematically. Job requirements and descriptions are clear and don't include non-job-

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related aspects. Remuneration is as per performance and merit.

objectives and is shared on 'need to know' basis.

16. To inculcate a sense of true equality, pride and self-esteem, no special dispensation is used in Performance Management System (PMS). All efforts are directed to ensure that performance & contributions are measured at par and relativity is as per general norms of the guidelines in this respect.

Reporting inappropriate Conduct:

1. If any employee believes that they or another individual has been treated unfairly or has been discriminated against on account of any of the parameters mentioned in this policy or its intent, the employee is urged to bring this to the notice of DEI Safeguard Forum
2. All reported incidents will be investigated with an effort to keep the source of the report confidential, with the disclosure of information as appropriate to facilitate the investigation or resolution of the matter
3. APSEZ encourages employees to

Equitability in condition of employment

APSEZ recognizes the importance of protecting rights of employees with differences are at parity with others. This includes

- a. Rights of just and favorable conditions of employment
- b. Healthy and safe working conditions
- c. Protection from harassment
- d. Ensuring redressal of grievances.

Employees are not discriminated against at any point in employment cycle. This concerns all matters related to recruitment, selection, appointment, career guidance and development, performance evaluations, learning opportunities, transfers, promotions, retention in employment and return to work. Any deviations from these principles are addressed in line with principles of natural justice.




report in good faith any possible violation of this Policy

Protection of Confidentiality of information

APSEZ respects confidentiality of any information provided by a staff member or job applicant. Utmost care is exercised by concerned officials of the company to ensure that data & information is used for limited purpose of identified

4. The organization will not tolerate threats or acts of retaliation of any kind against any individuals because they report conduct reasonably believed to violate this policy or in good faith provide information in

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connection with a report or investigation of any such conduct

5. Any employee found to have exhibited any inappropriate conduct or behavior against others will be liable to disciplinary action

Amendments & Overall ownership

The head of HR of APSEZ is overall owner of deployment. Periodic reviews will be carried by Head – HR, APSEZ to ensure implementation. Any amendment or modification to these guidelines will require the approval of CEO-APSEZ



Karan Adani
Whole-Time Director & CEO