

Adani Ports and Special Economic Zone Limited

Stakeholder Engagement Policy

We, at Adani Ports and Special Economic Zone Limited (APSEZ), recognize that stakeholder engagement is an integral part of our business operations. We strive to provide long-term sustainable value to our stakeholders such as investors, employees, customers, tenants, business partners, suppliers, government, and communities. To this end, it is vital for us to develop an understanding of our stakeholder's needs, interests, and expectations. We endeavor to achieve this through regular engagement and collaboration with all our stakeholder groups. Effective stakeholder engagement on an ongoing basis is essential for us to identify the opportunities and concerns arising from stakeholder's material issues and work towards their effective resolution.

The Company's approach to stakeholder engagement is governed by this Stakeholder Engagement Policy ("**Policy**"), read in conjunction with our Code of Conduct.

1. Scope

This Policy provides our overarching approach for engaging with our stakeholders. It has been put in place to ensure that stakeholder engagement is applied consistently across the operational boundaries of APSEZ and its subsidiaries and joint ventures.

Each business unit at every operating location is required to carry out stakeholder engagement in accordance with the principles of this policy, and to ensure that they maintain and commit to play a role in nurturing the Company's stakeholder relationships.

2. Objective

The objectives of this Policy are:

- to outline the methodologies, systems and processes for identifying and engaging with stakeholders;
- to continue to enhance stakeholders' trust and confidence in our processes and activities, while promoting a good understanding of stakeholders' needs and expectations;
- to improve the communication to engage stakeholders; and
- to convey and reinforce APSEZ's commitment towards all its stakeholders.

3. Stakeholder Identification and Prioritization

We identify stakeholders as those individuals, groups of individuals or organizations that affect us and/or could be affected by our activities or services and the associated performance. APSEZ analyses its internal and external environment to identify its internal and external stakeholders, which may include those individuals, groups of individuals and/or organizations:

- that are directly or indirectly dependent on APSEZ's activities or services and associated performance, or on whom APSEZ is dependent in order to operate;
- to whom APSEZ has, or in the future may have, legal, commercial, operational or ethical/moral responsibilities;
- who can influence or have impact on APSEZ's strategic or operational decision making; and
- who are affected by APSEZ's activities or services; vulnerable groups

Our key stakeholders include:

- Investors
- Customers
- Employees
- Communities
- Business partners
- Financial service providers
- Regulatory and government bodies
- NGOs/Social organizations
- Media

Stakeholders are prioritized based on relevance and profiled into different categories depending upon the specific context of engagement.

4. Stakeholder Engagement Process

At APSEZ, we promote a culture of ongoing engagement with every stakeholder group, collecting feedback. The most appropriate engagement tools and methods range from written communications, one-to-one meetings, feedback, information sessions, joint projects, surveys, focus group discussions etc.

We strive to abide by the following when engaging with any stakeholder:

- Prior to engaging with a stakeholder, define the purpose, scope and frequency of engagement and design appropriate engagement methods. The method and the level of engagement with a stakeholder is defined by nature of relationship

that APSEZ has with them or aims to develop with them;

- Acknowledge and assume responsibility about the impact of APSEZ's policies, decisions, services and associated operations on the stakeholders;
- Consider potential stakeholder engagement risks prior to selecting the level or method of engagement, and devise ways and means to address them. Potential risks may include participation fatigue, lack of stakeholder integrity, conflicts of interest, disruptive or uninformed stakeholders, and an unwillingness to engage. Proper planning and preparation are undertaken to understand the stakeholder profile and facilitate the stakeholder to have an open, credible and honest dialogue;
- Assess the capacity of the stakeholder to effectively engage while selecting the method of engagement. In case the stakeholders lack the capacity to engage (e.g. financial resources, technical capability, time, language, skills, cultural understanding or awareness of issues), appropriate capacity building measures may be taken by engaging business function, such as through assistance in overcoming the barriers of language, distance, knowledge, skills and resources, as appropriate, keeping in consideration the purpose and scope of engagement;
- Allow stakeholders to provide feedback and engage positively in business operations;
- Identifying Indigenous/ vulnerable people surrounding our project sites and respecting their rights to economic, social, cultural wellbeing and development and committed to refrain from operations in protected areas;
- Proactively engage with and respond to those that are disadvantaged, vulnerable and marginalized. Additionally, APSEZ gives special attention and develops initiatives in relation to stakeholders in areas that are underdeveloped;
- Settlement of stakeholder grievances in a fair, equitable and timely manner;
- Communicate and report the outcome of the stakeholder engagement to internal and external stakeholder groups through various modes as appropriate, including but not limited to the annual sustainability report, notices on our official website, one-to-one meetings etc.

Common Modes of Engagement with Key Stakeholders

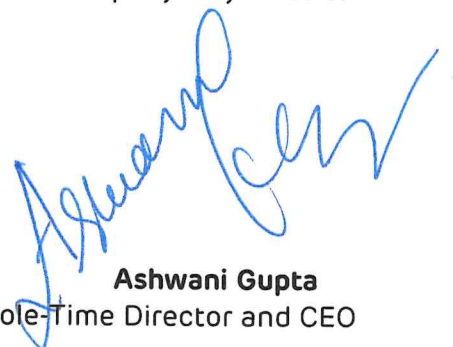
Our methods of engagement include multiple channels and means of communications reliant on each specific stakeholder group and can be grouped under the following broad categories: (i) monitoring, (ii) informing, (iii) consulting and (iv) collaborating. A more detailed list of common modes of engagement deployed for major stakeholders is provided in stakeholder engagement matrix below:

Stakeholder Group	Engagement Channel
Investors	<ul style="list-style-type: none"> ▪ Annual shareholder meeting ▪ Quarterly investor presentations and conference calls ▪ Investor conferences and meets ▪ Press releases and newsletters
Employees	<ul style="list-style-type: none"> ▪ Employee newsletters ▪ Intranet Portal ▪ Cultural events ▪ Trainings and performance management system ▪ Functional and cross-functional committees ▪ Emails, written communication
Community	<ul style="list-style-type: none"> ▪ Community meetings, surveys, impact assessments, and consultations ▪ CSR interventions and initiatives ▪ Awareness camps ▪ Community development through various events
Customers	<ul style="list-style-type: none"> ▪ Direct consumer calls ▪ Customer satisfaction surveys ▪ Complaint handling & feedback ▪ Marketing and Advertising ▪ Electronic Communication ▪ Training sessions
Contractors and Suppliers	<ul style="list-style-type: none"> ▪ Contractor and Supplier meets ▪ Regular interaction through phone, e-mail and in person ▪ Supplier Audits/Assessments ▪ Supplier Training & Awareness sessions
Government	<ul style="list-style-type: none"> ▪ Annual reports ▪ Communications with regulatory bodies ▪ Formal dialogues ▪ Face to face meetings
Media	<ul style="list-style-type: none"> ▪ Press Conferences ▪ Written Communication audio & visual communication

5. Stakeholders' concerns

If a stakeholder has any grievance, concerns or issues relating to the company may write to the company at online portal of Grievance Mechanism System

<https://www.adaniports.com/Grievance>.



Ashwani Gupta
Whole-Time Director and CEO