

Adani Ports and Special Economic Zone Limited

Supplier Code of Conduct

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1. Introduction

Adani Ports and Special Economic Zone Limited (APSEZ) considers suppliers as business partners. This Code of Conduct is to establish collaboration with our suppliers in the promotion of lawful, professional and fair business practices that integrates respect of human rights, business ethics and environment.

APSEZ is signatory to the United Nations Global Compact (UNGC) and is committed for responsible and ethical business practices in the areas of human rights, labour, environment and anti-corruption.

2. Applicability

This Supplier Code of Conduct is applicable to all Suppliers globally. Here, "Supplier" refers to material suppliers/ service providers/ vendors/ traders/ agents/ consultants/ contractors / third parties including their employees, agents and other representatives, who have a business relationship with and provide, sell, seek to sell, any kinds of goods or services to APSEZ or any of its subsidiaries and associated entities (hereafter referred as "APSEZ").

The Supplier shall communicate the code to related entities and subcontractors who support them in delivering materials or services and ensure adherence from all related entities and subcontractors.

3. Guidelines on Code

- **Regulatory Compliance:** The Supplier shall ensure to comply with all applicable laws and regulations in all the territories it operates.
- **Freely Chosen Employment:** The Supplier shall ensure to hire all their employees on their own free will; and all their operations are free from child, forced, and bonded labour or any other form of compulsory labour or slavery.
- **Equal Opportunity:** The Supplier shall ensure to provide equal employment opportunities and conducive environment to all its employees for their growth without any discrimination and harassment.
- **Working Hours, Wages and Benefits:** The Supplier shall comply with all applicable laws and regulations with respect to working hours, minimum wages, employing labour, including those pertaining to women and children. The Supplier shall treat their employees with respect and dignity.
- **Human Trafficking:** The Supplier shall ensure to comply with all anti-human trafficking laws internally and across their supply chains.

- **Freedom of Association:** The Supplier shall be committed to an open and constructive dialogue with their employees and worker's representatives, in accordance with local law.
- **Health and Safety:**
 - The Supplier shall ensure to provide safe and healthy working environment to its employees/ workers.
 - The Supplier shall ensure to take necessary precautionary safety measures and design processes against potential accidents and occupational hazards.
 - The Supplier shall ensure to meet general principles of health and safety risk prevention while products and services delivery. General principles include identifying, minimizing and preventing hazards using competent and trained people; maintaining safe equipment and tools; providing personal protective equipment as required.
 - The Suppliers shall ensure to impart adequate training to all employees, workers/ contractors on health and safety issues.
 - The Supplier shall ensure to provide safe, clean and secure accommodations to their employees, if applicable.
- **Environment Management:**
 - The Supplier shall ensure to optimize the processes to conserve natural resources and reduce the release of harmful emissions to the environment.
 - The Supplier shall ensure to undertake initiatives on continuous basis to promote environmental responsibilities and encourage environment friendly processes and technologies.
 - The Supplier shall ensure to comply all laws pertaining to sustainability, pollution, environment protection etc. as applicable.
 - The Supplier shall ensure to manage wastes of any form – hazardous, non-hazardous, industrial, solid/ liquid/ gaseous as per the prevailing/ recommended laws.
- **Subcontracting:** The Supplier shall not use any subcontractor in connection with any APSEZ business unless subcontractor abides by the same conditions as put forth by APSEZ. The Supplier shall submit declaration with list of subcontractors to

APSEZ prior to commencement of work. APSEZ must be notified immediately in case of any changes in subcontracting.

- **Adherence with Company Policy:** The Supplier shall follow all contract conditions and other applicable policies of the Company while executing any work at APSEZ Company sites.
- **Bribery or Corruption:** The Supplier shall not offer or accept bribes or other unlawful incentives to/from their business partners.
- **Conflict of Interest:** The Supplier shall not take advantage of any family/ social/ political connections to obtain favorable treatment that creates any actual or potential conflict of interest.
- **Grievance Redressal:** The Supplier shall ensure that any worker/ employee, acting individually or with other workers, can submit grievance and an effective grievance procedure should be established for its redressal.
- **Reporting of Unethical Practices:** The Suppliers shall report any unethical activity or discrimination if practiced by any of APSEZ employee/ other supplier as per the whistle-blower policy. The policy is uploaded on the Company website (<https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Whistle-Blower-Policy.pdf>).
- **Intellectual Property:** The Supplier shall ensure that all employees' and business partners' privacy and intellectual property rights which includes protection against disclosures, patents, copyrights and trademarks are protected.
- **Third Party Representation:** The Suppliers shall not be authorized to represent APSEZ or to use APSEZ brands without written permission from APSEZ. Third parties and their employees who are authorized to represent APSEZ are expected to abide by provision in the non-disclosure agreement to be signed by them.
- **Prohibition on Insider Trading:** The Suppliers and their personnel shall not use any material or non-publicly disclosed information for trading of APSEZ securities or enabling others for the same.

4. Supplier Evaluation

APSEZ has set specific supplier expectation regarding supplier performance with the Code. APSEZ will continue to evaluate the Suppliers taking into consideration the ability to meet the objective and expectations of this Code.

5. Continuous Improvement

Where applicable, APSEZ will support Suppliers in the establishment of best practices in order to meet and exceed the standards outlined in the Code.

6. Acceptance

By signing the purchase order/ contract/ agreement copy the Supplier acknowledges having read, understood and accepted the guidelines as described in the Supplier Code of Conduct. The Suppliers are expected to fulfill the aforementioned key elements by incorporating them in their own business practices.

Please contact suppliercoc@adani.com if you have any questions about this Code.