

# **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 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 associated entities.

Suppliers would communicate the code to related entities and sub-contractors who support them in delivering materials or services.

## **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 ensure to comply with applicable laws and regulations for working hours and minimum wages.
- **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.

- **Safe and Healthy Working Environment:** The Supplier shall ensure to provide safe and healthy working environment to its employees/ workers.
- **Adherence with Company Policy:** The Supplier shall follow all contract conditions and other applicable policies of the Company while executing any work at our Company site.
- **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 our employee/ other suppliers as per our whistle-blower policy. (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 employee's and business partner's 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 us or to use our brands without our written permission. Third parties and their employees who are authorized to represent us 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 our securities or enabling others for the same.

#### **4. Supplier Evaluation**

- We have set specific supplier expectation regarding supplier performance with the Code. We will continue to evaluate our Supplier taking into consideration the ability to meet the objective and expectations of this Code.

## **5. Continuous Improvement**

- Where applicable, we 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 accept the required principle of decent business conduct as described in the Supplier Code of Conduct. We expect our suppliers to fulfill the aforementioned key elements by incorporating them in their own business practices.

Please contact [suppliercoc@adani.com](mailto:suppliercoc@adani.com) if you have any questions about this Code.