



2nd September, 2022

BSE Limited

P J Towers,
Dalal Street,
Mumbai – 400001

Scrip Code: 542066

Dear Sir/ Madam,

Sub: Submission of Business Responsibility and Sustainability Report

Pursuant to Stock Exchange Notice no. 20220715-14 dated July 15, 2022, we attach herewith Business Responsibility and Sustainability Report of the Company for the FY 2021-22.

Kindly take the same on your records.

Thanking you.

Yours faithfully,
For **Adani Total Gas Limited**

Gunjan Taunk
Company Secretary

Adani Total Gas Limited
(Formerly known as Adani Gas Ltd)
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Business Responsibility Sustainability Report

SECTION A: GENERAL DISCLOSURE

I. Details of the listed Entity

1	Corporate Identity Number (CIN) of the Listed Entity	L40100GJ2005PLC046553
2	Name of the Listed Entity	Adani Total Gas Limited (ATGL / Company)
3	Year of incorporation	2005
4	Registered office address	"Adani Corporate House", Shantigram, Near VaishnoDevi Circle, S. G. Highway, Khodiyar, Ahmedabad – 382421, Gujarat, India.
5	Corporate address	"Adani Corporate House", Shantigram, Near VaishnoDevi Circle, S. G. Highway, Khodiyar, Ahmedabad – 382421, Gujarat, India.
6	E-mail	investor.agl@adani.com
7	Telephone	+91 79 6624 3027
8	Website	www.adanigas.com
9	Financial year for which reporting is being done	Financial Year 2021-22
10	Name of the Stock Exchange(s) where shares are listed	BSE Limited (BSE) and National Stock Exchange of India Limited (NSE)
11	Paid-up Capital	₹109.98 crore
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Name: Mr. Suresh P Manglani Designation: Chief Executive Officer Telephone No.: +91 79 6624 3027 Email Id: investor.agl@adani.com
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Disclosures under this report are made on a Standalone basis.

II. Products and Services

14. Details of business activities (accounting for 90% of the turnover):

Sr. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Distribution of gaseous fuels through mains	Sale of Piped Natural Gas (PNG) /Compressed Natural Gas (CNG) to Domestic, Commercial, Industrial and transport sector customers.	98.53%

15. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

Sr. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Piped Natural Gas (PNG) / Compressed Natural Gas (CNG)	3520	98.53%

III. Operations**16. Number of locations where plants and/or operations/offices of the entity are situated**

Location	Number of plants	Number of offices	Total
National	357*	49	406
International	Nil	Nil	Nil

*This includes 18 Nos. of City Gas Stations, 334 Nos. CNG Stations and 5 Nos. L-CNG Stations.

17. Markets served by the entity:

a. Locations	Number
National (No. of States)	12
International (No. of Countries)	Nil

b. What is the contribution of exports as a percentage of the total turnover of the entity?

Nil

c. A brief on types of customers:

Adani Total Gas is developing City Gas Distribution (CGD) Networks to supply Piped Natural Gas (PNG) to the Industrial, Commercial, Domestic (residential) and Compressed Natural Gas (CNG) to the transport sector.

IV. Employees**18. Details as at the end of Financial Year****1. Employees (including differently abled):**

Particulars	Total (A)	Male		Female	
		No. (B)	% (B/A)	No. (C)	% (C/A)
EMPLOYEES					
Permanent (D)	420	413	98.33%	7	1.66%
Other than Permanent (E)	2	2	100.00%	-	-
Total Employees (D+E)	422	415	98.34%	7	1.66%
WORKERS					
Permanent (F)	46	43	93.4%	3	6.5%
Other than Permanent (G)	102	102	100%	-	-
Total Workers (F+G)	148	145	97.97%	3	2.03%

2. Differently abled Employees and workers:

Particulars	Total (A)	Male		Female	
		No. (B)	% (B/A)	No. (C)	% (C/A)
DIFFERENTLY ABLED EMPLOYEES					
Permanent (D)	-	-	-	-	-
Other than Permanent (E)	-	-	-	-	-
Total Differently abled employees (D+E)	-	-	-	-	-
DIFFERENTLY ABLED WORKERS					
Permanent (F)	-	-	-	-	-
Other than Permanent (G)	-	-	-	-	-
Total differently abled Workers (F+G)	-	-	-	-	-

19. Participation/Inclusion/Representation of women

Particulars	Total (A)	Number (B)	Percentage of Females % (B/A)
Board of Directors	8	2	25%
Key Management Personnel	3	-	-

20. Turnover rate for permanent employees and workers: (Disclose trends for the past 3 years)

Particulars	Turnover Rate in FY 2021-22			Turnover Rate in FY 2020-21			Turnover Rate in FY 2019-20		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	16.19%	0.00%	15.90%	7.10%	0.00%	6.96%	7.31%	14.29%	7.49%
Permanent Workers	0.00%	0.00%	0.00%	1.75%	0.00%	1.67%	0.00%	0.00%	0.00%

V. Holding, Subsidiary and Associate Companies (including joint ventures)**21. Names of holding / subsidiary / associate companies / joint ventures**

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Indian Oil - Adani Gas Private Limited	Joint Venture	50%	No
2	Smartmeters Technologies Pvt Ltd	Joint Venture	50%	No

VI. CSR Details

Particulars	Response
22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes
(ii) Turnover (in ₹)	₹3,206 crore
(iii) Net worth (in ₹)	₹2,284 crore
(iv) CSR Obligation for FY 21-22	₹10.26 crore
(v) CSR contribution made for FY 21-22	₹10.27 crore

VII. Transparency and Disclosures Compliances**23. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct.**

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	Current Financial Year 21-22			Previous Financial Year 20-21		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	Nil	Nil	Nil	Nil	Nil	Nil
Investors (other than shareholders)	Yes	Nil	Nil	Nil	Nil	Nil	Nil
Shareholders	Yes	2	-	Nil	4	-	Nil
Employees and workers	Yes	Nil	Nil	Nil	Nil	Nil	Nil
Customers	Yes	84,305	2,191	Nil	53,486	1,303	Nil
Value Chain Partners	Yes	Nil	Nil	Nil	Nil	Nil	Nil
Other (please specify)	Nil	Nil	Nil	Nil	Nil	Nil	Nil

Note: Some of the policies guiding ATGLs conduct with all its stakeholders, including grievance mechanisms are placed on the Company's website. In addition, there are internal policies placed on the intranet.

24. Overview of the entity's material responsible business conduct issues

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate the positive/negative implications)
1	Risk Management	Risk	Developing effective risk mitigation strategies is critical to the Company's ability to capitalise on opportunities, remain ahead of the curve, and minimise business disruptions.	Board's Risk Committee has adopted a Risk Policy. Risks, including ESG risks, are identified periodically, and a systematic approach to controlling them is defined. Accordingly, appropriate mitigation plans are set up.	The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.
2	Grievance Redressal Mechanisms	Opportunity	Presence of a robust grievance redressal framework helps our stakeholders to reach out to us with their concerns. It provides us with an opportunity to understand their expectations. The concerns and expectations of our stakeholders acts as an important input for our business decisions and strategy. With customers being one of our key stakeholders, effective grievance redressal helps us enhance the brand value as well as structure our services in a better manner.	N/A	The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.
3	Human Rights	Risk	We are committed to uphold human rights of our employees, communities and other stakeholders.	ATGL and its promoters group level have a policy on Human Rights, based on international standards and frameworks, ensures the wellbeing of its stakeholders.	The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.
4	Product Availability/ Access to Gas	Risk / Opportunity	Our business operations are build on the accessibility of Natural Gas (NG). Delays in the transportation can impact the entire value chain. Opportunity for ATGL is set to surge as NG demand would go up from 6% to 15% in fuel basket by 2030	The Company has a robust channel of distribution which ensures minimal impact across the value chain in occurrence of emergencies.	Potential for impact on sales volume and customer dissatisfaction Would be able to serve an enhanced universe of consumers which could yield higher sales and revenue. The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate the positive/negative implications)
5	Training and Development	Opportunity	Equipping ATGL's workforce with the requisite technical and behavioural skills, through regular trainings, helps the Company raise the bar on quality of its offerings and become increasingly future-ready.	N/A	The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.
6	Talent Attraction and retention	Opportunity	Recruiting and retaining the best talent helps ATGL deliver value to its customers and helps in maintaining its market leadership.	N/A	The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.
7	Labor Practices	Risk	By upholding human rights and ensuring sound labor practices, the Company avoids disciplinary actions, avoids penalties, and empowers its employees.	The Company adheres to all the laws of the land, related to human rights and labour practices. No child, forced or compulsory labour is deployed by ATGL, and its policy framework nurtures a diverse, safe and empowered workforce.	The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.
8	Community Development	Opportunity	In ATGL's quest to grow responsibly, the Company empowers the communities they operate in to make them self-reliant and self-dependent.	N/A	The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.
9	Data Privacy and Security	Risk	Safeguarding the security of the data and the entire value chain, particularly customers is important for its business operations.	Safeguarding the security of the data and the entire value chain through cyber risk assessment and implementation of business continuity plan for IT platforms.	The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate the positive/negative implications)
10	Climate change adaption and mitigation	Risk/ Opportunity	<p>Risk Climate risk can pose challenge to our installation, infrastructure due to harsh climatic condition (flood, cyclone etc.) Due of climate change issue, emerging and potential regulations the public can move towards cleaner energy source i.e. EVs, Hydrogen etc. can reduce the consumption of NG</p> <p>Opportunity: Climate adaptation and mitigation are key to building a future-ready organisation. They can also reduce operational costs and drive greater efficiencies for the business. The replacement of conventional sources of fuel with NG is our effort towards building a cleaner future.</p>	The Company is in the process of developing the climate vulnerability risk strategy	<p>Making the business more sustainable and taking initiatives towards reduction of carbon emission would gain higher ESG scores.</p> <p>The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.</p>
11	Diversity and Inclusion	Opportunity	Developing a diverse and inclusive work culture enables an organisation's position as an employer of choice.	N/A	The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.
12	Employee Health, Safety and well-being	Risk	The employees are the greatest assets and their safety and well being is of paramount importance. This is achieved by assessing and controlling health and safety risks across our operations	Comprehensive Quality, health, safety & environment policy & procedure has been instituted by ATGL which emphasises on safety as a pre-condition for employment.	<p>Increase in injuries and low employee morale and business's reputation.</p> <p>The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.</p>

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate the positive/negative implications)
13	Energy and Emissions Management	Risk	Minimizing business's energy consumption and Carbon footprint is crucial to mitigate climate change.	ATGL's aligning its business with India's goal to become net zero by reducing its emissions through initiatives like installation of Solar panels , Methane leak detection , Energy conservation audits and Decarbonization of fleets and is exploring, Bio gas and EVs charging	Will increase business's scope emissions and impact investor's confidence. The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.
14	Water Management	Risk	Water is a shared resource, making it important for businesses to use it responsibly. Ensuring responsible consumption is key to the business' social license to operate and a sustainable planet for all.	The Company is working to reduce its water consumption through Water management studies, Water meters and Rainwater Harvesting.	Will increase the business's water consumption which may impact natural resources as water is scarce. The process of identifying and quantifying the financial implications of the identified risks and opportunities is currently underway.

SECTION B : MANAGEMENT AND PROCESS DISCLOSURES

Sr. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes										
1	a. Whether your entity's policy/ policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web Link of the Policies, if available	https://www.adanigas.com/investors/corporate-governance								
2	Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3	Do the enlisted policies extend to your value chain partners? (Yes/ No)	Yes. The suppliers are required to comply with all the Company's policies including ESG as stated in Suppliers Code of Conduct.								

Sr. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
4	Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.									
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.									
6	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.									

- ISO 9001:2015 Quality Management System
- ISO 14001:2015 Environmental Management System
- IISO 45001:2018 Occupational Health and Safety Management System.
- GRI Standard ASME B31.8
- GRI Standard ASME B31.8S
- GRI Standard NACE, PNGRB,T4S/IMS/ERDMP Regulations. OISD etc.

- ATGL has aligned its business with UN Sustainability Development Goals
ATGL has rolled out several ESG initiatives which includes :
- a) Installation of solar panels in all feasible locations including CNG CGS Offices and LCNG sites summing up to 1Mw in FY23
 - b) Conducting Energy efficiency Audit for 50 Locations (CGS , CNG Stations and Offices)
 - c) 100% Conversion of HSD LCVs into CNG powered by FY23
 - d) All ATGL offices to be certified as Single use plastic free by FY23
 - e) 100% employees to be trained on Health Safety
 - f) Lost Time Injury Frequency to be maintained less than 0.5
 - g) Roll out Low Carbon Society (Greenmosphere) enabling community involvement to mitigate climate change
 - h) Roll Out Compressive Compliance Policies and ensure that 100% employees and stakeholders are trained

- a) Installation of solar panels in 32 sites yielding 550kw has been installed in FY22
- b) 100% Energy Audits (50 Sites) were completed in FY 22
- c) 100% Conversion of HSD LCVs into CNG powered, 50% (155 out of 322) Conversion already done in FY22
- d) 5 ATGL offices in Ahmedabad were certified Single Use Plastic Free by CII in FY22
- e) 100% employees were trained on Health safety during the FY22
- f) Lost time injury frequency was maintained as Zero in FY22
- g) Launched Greenmosphere working on 3 broad streams (Plantation, Green Millennials, Energy Audit) 540 students were educated on Climate Change and more than 55,000 saplings were planted under this program
- h) Rolled Out Compressive Compliance Policies and trained all the on-roll employees

Sr. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Governance, leadership and oversight										
7	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements	<p>ATGL is joint venture company of Adani Group, India and Total Energies, France. ATGL strongly believes that embedding Environmental, Social, and Governance (ESG) principles in its business operations is not only a responsibility but an essential part of our DNA. Adherence to these principles helps build resilience, transform culture and long-term value creation to systematically identify opportunities, manage risks, and secure the interest of all our stakeholders.</p> <p>ATGL is developing City Gas Distribution (CGD) Networks to supply the Piped Natural Gas (PNG) to Industrial, Commercial, Domestic (residential) and Compressed Natural Gas (CNG) to the transport sector. NG is a convenient, reliable and environment friendly fuel that allows consumers to enjoy a high level of safety, convenience and economic efficiency.</p> <p>At ATGL, corporate governance comprises rules, practices, processes and policies by which the Company is managed. The spirit of governance balances the interests of all stakeholders (shareholders, management, customers, suppliers, financiers, government and community). The result is that governance is not incidental but integral to the existence of the organization.</p> <p>Being at the centre of ATGL's corporate governance practice, our Board possess a prudent balance of skills, knowledge and experience and mix & match of male and female compositions. The Company's governance practice is supported by committees (statutory committee and as well as non-statutory committees) to which certain Board responsibilities are delegated and these committees report to the Board. .</p> <p>ATGL has mapped all their GHG emissions and is continuously working to minimize it. Methane leak detection survey and repair has been conducted for all its MDPE network to reduce fugitive emissions of methane. ATGL has initiated Solarization putting rooftop solar plant of all office/CGS/store and set target of 1 MW by FY23. Energy efficiency audits have been conducted across all offices/ CGS/CNG stations and energy saving proposals are being implemented. All these efforts would help to reduce GHG emission (both scope 1 &2) significantly.</p> <p>An unique green initiative has been launched by ATGL involving the community through mass plantation (i.e. Miyawaki technique) and educating students on climate change & sustainability. A Biodiversity park (ATGL Forest) is being developed at Gota, Ahmedabad covering 10 acres of land, which would accommodate around 2.5 Lakh trees.</p> <p>Considering the climate change factor, ATGL has been working towards low carbon gas retail and initiated Bio gas , Electric vehicle charging, Green Hydrogen pilot studies for future proofing its bussiness.</p> <p>ATGL aspires to be a distinguished Leaderin ESG space among all CGD in India.</p>								

Sr. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	The Board of the Company has constituted a Corporate Responsibility Committee comprising solely of the Independent Directors to oversee strategies, activities and policies including environment, social, sustainability, governance, health and safety, human talent management and related material issue and indicators in the global context and evolving statutory framework.								
9	Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Corporate Responsibility Committee (a subcommittee of the Board) with 100% Independent Directors). The Committee meets on a quarterly basis.								

10. Details of Review of each NGRBCs by the Company

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other - pls specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action Compliance with statutory requirements of relevance to the principles and, rectification of any non-compliances.	Y	Y	Y	Y	Y	Y	Y	Y	Y									Quarterly
	P1	P2	P3	P4	P5	P6	P7	P8	P9									
	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes									Yes
11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9									
	No	No	No	No	No	No	No	No	No									No

Note: Some of the policies guiding ATGLs conduct with all its stakeholders, including grievance mechanisms are placed on the Company's website. In addition, there are internal policies placed on the intranet.

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURES

Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

1. Percentage coverage by training and awareness programs on any of the Principles during the financial year:

Segment	Total number of training and awareness programs held	Topics / principles covered under the training and its impact	Percentage of persons in respective category covered by the awareness programs
Board of Directors	1	<ul style="list-style-type: none"> • ATGL's ethical and sustainable & safe Practices 	100
Key Managerial Personnel	8	<ul style="list-style-type: none"> • ATGL's ethical and sustainable & safe Practices • Code of Conduct Policy awareness • Third Party Due Diligence Policy Awareness. • Prevention of Anti-Competitive Practices Compliance Policy. • Human Resource Guidelines • Interaction with Government & Public Officials • Human Rights Policy. • Prevention of sexual harassment 	100
Employees other than BoD and KMPs	7	<ul style="list-style-type: none"> • Code of Conduct Policy awareness • Third Party Due Diligence Policy Awareness. • Prevention of Anti-Competitive Practices Compliance Policy. • Human Resource Guidelines • Interaction with Government & Public Officials • Human Rights Policy. • Prevention of sexual harassment 	80
Workers	7	<ul style="list-style-type: none"> • Code of Conduct Policy awareness • Third Party Due Diligence Policy Awareness. • Prevention of Anti-Competitive Practices Compliance Policy. • Human Resource Guidelines • Interaction with Government & Public Officials • Human Rights Policy. • Prevention of sexual harassment 	80

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format:

Monetary

Particulars	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes / No)
Fine	Nil	Nil	Nil	Nil	Nil
Penalty	Nil	Nil	Nil	Nil	Nil
Settlement	Nil	Nil	Nil	Nil	Nil
Compounding Fees	Nil	Nil	Nil	Nil	Nil

Non-Monetary

Particulars	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes / No)
Imprisonment	Nil	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	Nil

3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
NA	NA

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

The Company has adopted the following Board-approved anti-corruption policies:

- Conflicts of Interest Policy
- Donations, Social Funds, Contributions, Sponsorships and Corporate Social Responsibility
- Gifts and Hospitality Policy
- Human Resources Guidelines
- Interaction with Government and Public Officials
- Third-Party Due Diligence Policy
- Training and Communication Policy

Weblink:<https://www.adanigas.com/investors/corporate-governance>

5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:

Particulars	FY 2021-22 (Current Financial Year)	FY 2020-21 (Previous Financial Year)
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

6. Details of complaints with regard to conflict of interest:

Particulars	FY 2021-22 (Current Financial Year)		FY 2020-21 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
	Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	NA	Nil	NA

7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.

Not Applicable

Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe.**1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.**

Particulars	Current FY 2021-22	Previous FY 2020-21	Details of improvements in environmental and social impacts
R&D	Nil	Nil	NA
Capex	0.23%*	Nil	Installation of solar panels reduces the amount of purchased electricity by the business which minimizes the Scope 2 GHG emission.

Note : ₹2.15 crore

2. Does the entity have procedures in place for sustainable sourcing? (Yes/No) If yes, what percentage of inputs were sourced sustainably?

The Company has a Suppliers' Code of Conduct stating specific expectations for engaging with suppliers. 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 the Company or any of its subsidiaries and associated entities.

The Suppliers' Code of Conduct facilitates collaboration with our suppliers in the promotion of professional and fair business practices that integrates respect of human rights, business ethics and environment. Our objective is to ensure that we minimize our potential impacts on people and on the environment, and that we manage business and reputation risks while capitalizing on opportunities. For example, we make efforts to source supplies and services from local sources where possible. We also organize various capacity building programs for our value chain partners.

We also encourage our suppliers to be compliant with social and environmental standards such as SA8000, ISO 14001, and ISO 45001. All our suppliers are expected to apply the Suppliers' Code of Conduct or more stringent standards in a manner that is appropriate and proportional to the nature and scale of their activities, the goods that they supply and the services that they perform.

ESG related specific clauses is mentioned in our General Term and Condition (GTC) in every supplier's contract.

Apart from Supplier Code of Conduct, we have also implemented internal system for vendor registration which includes supplier screening based on ESG criteria. This system helps to ensure that the vendor onboarded meets all the sustainability criteria defined by the system.

However at present, percentage of inputs sources sustainably is not currently mapped for ATGL.

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

All our wastes are identified for recycling/disposing as per Pollution Control Board Norms.

The Company has defined processes for managing waste at each of its sites/locations. The hazardous wastes are handled, segregated, stored and transported in accordance with applicable regulatory requirements and best industry practices.

The hazardous waste is disposed of in an environmentally sound manner through authorized vendors for recycling as required by regulation.

Apart from hazardous waste, the most significant types of non-hazardous waste streams scrap metal, packaging waste, wood waste, glass, tires, e-waste, cardboard, and paper. Our strategic intent is to eliminate or reduce the generation of waste to divert waste from disposal through reuse and recycling wherever possible. We all are working towards achieving Zero waste to landfill certification wherever feasible.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Owing to the nature of the Company's product/service offerings, EPR is not applicable to the Company.

Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains

1. a. Details of measures for the well-being of employees:

Our people form an integral part of our journey towards transformational, responsible and sustainable change. Our people policies are designed to provide an excellent work environment which is safe, conducive, harmonious and support all round development of our employees. Our efforts to nurture our Human Capital are in alignment with our ESG commitment.

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	413	413	100%	413	100%	-	-	413	100%	-	-
Female	7	7	100%	7	100%	7	100%			-	-
Total	420	420	100%	420	100%	7	100%	413	100%	-	-
Other than Permanent Employees											
Male											
Female											
Total											

b. Details of measures for the well-being of workers:

In order to ensure safety and well-being at workplace, we conduct various trainings for all our employees as well as contractual workers. We focus on making the trainings relevant and practical by engaging our workforce in different modules. We also conduct various awareness and health promotion activities for our employees and contractual workers.

Company carry out periodical medical examination for employees as well as contractual workers, in compliance to the applicable regulations.

We also have specific health standards and undertake first aid and health emergency management and have employed qualified medical practitioner at each of our business locations. To protect our employees and contractual workers, appropriate personal protective equipment's (PPEs) are also provided.

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent workers											
Male	43	43	100%	43	100%	-	-	43	100%	-	-
Female	3	3	100%	3	100%	3	100%	-	-	-	-
Total	46	46	100%	46	100%	3	100%	46	100%	-	-
Other than Permanent workers											
Male	102	102	100%	102	100%	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
Total	102	102	100%	102	100%	-	-	-	-	-	-

2. Details of retirement benefits, for Current FY and Previous FY.

Benefits	FY 2021-22 Current Financial Year			FY 2020-21 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted & deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted & deposited with the authority (Y/N/N.A.)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	Yes	100%	100%	Yes
ESI*	100%	100%	100%	100%	100%	100%
Others – Pls specify	Nil	Nil	Nil	Nil	Nil	Nil

Note: All eligible employees and workers are covered under ESI. For the business location, which don't come under purvirw of ESI, the workforce is covered works man compensation act, 1923

3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

At our corporate office, we have made special provisions for differently abled employees and workers in accordance with Rights of Persons with Disabilities Act, 2016, such as ramps at entry locations and lobbies to facilitate wheelchairs. We have dedicated toilets for differently abled employees. We have elevators with Braille signs, designed for blind people or visually impaired people.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

The organization believes in equal opportunity and for the same the policy is in the review stage and will be published soon.

Weblink : Not applicable

5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	100%	100%	100%
Female	-	-	-	-
Total	100%	100%	100%	100%

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief. (If Yes, then give details of the mechanism in brief)

Permanent Workers	Yes. The Company has put in place an internal grievance handling system called as Adani Grievance Management Tool. Employees can raise their grievances through the portal. The Grievance Redressal Committee (GRC). GRC Secretary receives and acknowledges the grievance. After review, the grievance is assigned to the investigator. The investigator conducts the investigation and records his/ her findings which are sent back to the GRC Secretary. GRC Secretary tables the findings before GRC Committee to arrive at a resolution of the grievance and responds to the user with details and resolution of the grievance.
Other than Permanent Workers	Yes. Workers who are engaged on contractual basis can report their grievances to their respective contractor representative or the Company supervisor. The contractor is expected to take the required action to address the worker grievances, and if required, can raise the grievance to HR and respective functional heads.
Permanent Employees	Yes. Same as for permanent workers, detailed in earlier response.
Other than Permanent Employees	Yes. People engaged on a project / periodic basis are governed by the terms & conditions of the contract. Grievances if any, can be raised with concerned HR Business Partners and respective functional heads.

7. Membership of employees and worker in association(s) or Unions recognized by the listed entity:

The Company does not have any employee association. However, we recognize the right to freedom of association and does not discourage collective bargaining.

Category	FY 2021-22 Current Financial Year			FY 2020-21 Previous Financial Year		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)
Total Permanent Employees	Nil	Nil	Nil	Nil	Nil	Nil
- Male	Nil	Nil	Nil	Nil	Nil	Nil
- Female	Nil	Nil	Nil	Nil	Nil	Nil
Total Permanent Workers	Nil	Nil	Nil	Nil	Nil	Nil
- Male	Nil	Nil	Nil	Nil	Nil	Nil
- Female	Nil	Nil	Nil	Nil	Nil	Nil

8. Details of training given to employees and workers:

Category	FY 2021-22 Current Financial Year					FY 2020-21 Previous Financial Year				
	Total (A)	On Health & safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No.(B)	%(B/A)	No.(C)	%(C/A)		No.(E)	%(E/D)	No.(F)	%(F/D)
Employees										
Male	413	413	100%	347	84%	361	361	100%	343	95%
Female	7	7	100%	7	100%	7	7	100%	7	100%
Total	420	420	100%	354	84%	368	368	100%	350	95%
Workers										
Male	43	43	100%	43	100%	54	54	100%	54	100%
Female	3	3	100%	3	100%	3	3	100%	3	100%
Total	46	46	100%	46	100%	57	57	100%	57	100%

9. Details of performance and career development reviews of employees and worker:

Category	FY 2021-22 Current Financial Year			FY 2020-21 Previous Financial Year		
	Total (A)	No.(B)	%(B/A)	Total (C)	No.(D)	%(D/C)
Employees						
Male	413	323	78%*	361	292	81%*
Female	7	7	100%	7	7	100%
Total	420	330	79%	368	299	81%
Workers						
Male	43	41	95%*	54	54	100%
Female	3	3	100%	3	3	100%
Total	46	44	96%	57	57	100%

Note: * The balance employees were not eligible for PMS, considering their tenure in the Company

10. Health and safety management system:

a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?

Yes, we have obtained the integrated management system ("IMS") certification comprising Quality Management System, Environmental Management System and Occupational Health and Safety Management system as per ISO standard.

b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

ATGL has established and aligned globally recognized high level Safety Intervention and Risk Assessment programs such as Safety Interaction (SI), Vulnerability Safety Risks (VSR), Site Risk Field Audits (SRFA), Process Hazard Analysis (PHA), and Pre-Startup Safety Review (PSSR) with Business specific Integrated Management System based Hazard Identification and Risk Assessment Process, e.g., HIRA and JSA. The Company has adopted this framework and the reporting businesses have developed an ecosystem of participative and consultative approach for engaging concerned stakeholders, including, employees, associates, and contract workmen.

The Company recognizes that the dynamic risks need to be managed and mitigated as per Hierarchy of Control to protect its stakeholders and achieve objective of Zero Harm with enablement of Sustainable Growth.

Risks and opportunities are identified by each department with respect to HSE. We carry out routine risk-based inspections, surveillance and monitoring of our City Gas Distribution network on a 24/7 basis. vulnerability safety risk, Hazard operability (HAZOP), Hazard Identification & Risk Assessment (HIRA) and Quantitative Risk Assessment (QRA) studies to identify hazards and high-risk areas and action plans are reviewed regularly to further prevent and mitigate the risks.

c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)

Yes, the Company uses the Adani Group's well established Incident Management and Investigation System for fair and transparent reporting of work-related hazards and risks as unsafe acts/ unsafe conditions, near misses, injuries and illness and serious incidents. This is followed by a comprehensive Root Cause Failure Analysis (Investigation), formulation of corrective actions as per Hierarchy of Controls, its tracking and monitoring and subsequent closure. The outcome and learnings from these events and incidents are deployed horizontally across the Group through a systemic process of 'Critical Vulnerable Factor' (CVF) as a part of Group Safety Governance Process. The progress on CVF is reviewed during Adani Apex Group Safety Steering Council Meetings as well as during their Business Safety Council Meetings.

To facilitate this, an advanced digital platform on OH&S Reporting has been deployed by Adani Group. The Company access this platform through its machines as well as native and lite Mobile App version.

d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)

Yes, the employee/workers undergo periodic health checkups and use health care services provided on online platform for telemedicine consultation, yoga and other health care services.

11. Details of safety related incidents, in the following format:

Safety Incident/Number	Category	Current FY (2021-22)	Previous FY (2020-21)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	-	-
	Workers	-	0.45
Total recordable work-related injuries	Employees	1	-
	Workers	4	3
No. of fatalities	Employees	-	-
	Workers	-	-
High consequence work-related injury or ill-health (excluding fatalities)	Employees	-	-
	Workers	-	-

12. Describe the measures taken by the entity to ensure a safe and healthy workplace.

We place great emphasis on safety and continue to maintain a good record of safe operations. We have established a dedicated Quality, Health, Safety & Environment (QHSE) management department to oversee QHSE issues for our CGD network and adopted a comprehensive QHSE management system and policy which is applicable to our employees and contractors. We also have Petroleum and Explosives Safety Organisation ("PESO") & Petroleum & Natural Gas Regulatory Board (PNGRB) certification for all our assets.

Further, we have obtained the integrated management system ("IMS") certification comprising ISO 9001 Quality Management System, ISO 140001 Environmental Management System and ISO 45001 Occupational Health and Safety Management system.

Our leaders demonstrate felt leadership by frequent engagement with site team through "Suraksha Samwaad – Safety interaction process". HSE Governance framework is in place with one Business level safety committee & 05 Safety task forces. All committees have their own charter, KPI's & meet on a monthly basis to enhance safety management system on continual basis

HSE assurance audits are conducted both external as well as internal covering PNGRB Regulations, workplace safety standards, asset integrity & contractor safety.

We encourage our employees and stakeholders to perform daily monitoring and report any potential dangers, safety concerns, hazards and other incidents through our mobile and web-based incident reporting system. Employees at all levels are engaged through Suraksha Samwaad/Safety interaction & Safety Risk field audit (SRFA).

Risk & opportunities are identified by each department with respect to HSE. We carry out routine risk-based inspections, surveillance and monitoring of our CGD network on a 24/7 basis. vulnerability safety risk, HAZOP, HIRA and QRA studies to identify hazards and high-risk areas and action plans are reviewed regularly to further prevent and mitigate the risks.

We have ATGL HSE /ISO procedures in place addressing safety requirements for all our processes.

We also provide safety induction training to our employees and contractors and safety, technical and operations competency training to all contractor employees, which includes training on critical HSE procedures. Besides this Training Need Identification (TNI) based training is also imparted.

Contractor safety six step process is in place starting from contractor pre-qualification to post contract evaluation. Frequent engagement sessions, training & audits are carried out to enhance contractor safety performance. Yearly third-party assessment is carried out for all contractors under "ATGL Green Cap Program".

Logistic Safety is one of our key risks. We have dedicated Logistic safety task force & central logistic control center to monitor logistic safety performance. Structured defensive driving program is in place for all our fleet drivers. We have vehicle tracking system installed in all our vehicles. Journey risk management is carried out for all our routes.

We have a well-established emergency response and disaster management plan for all authorized GAs in compliance with the requirements set out by the PNGRB. We comply with various technical standards and specifications applicable to our industry, including the safety standards issued by PNGRB. We have also set up a centralized master control to report any emergencies and manage any unexpected or accidental incidents.

13. Number of Complaints on the following made by employees and workers:

Category	Current FY (2021-22)			Previous FY (2020-21)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	NA	Nil	Nil	NA
Health & Safety	Nil	Nil	NA	Nil	Nil	NA

14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	All our sites are assessed on Health & Safety parameters. As below frequency - ISO audits Half yearly - PNGRB statutory audit (3 yearly/5 yearly) - 3 rd party contractor assessment yearly - 3 rd party HSE assurance audit yearly - 3 rd party asset Integrity audit yearly
Working Conditions	

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

ATGL has deployed system of Critical Vulnerable Factor (CVF) through which corrective action arising out of any incidents is deployed horizontally across all locations

We also conduct Vulnerability Safety Risk (VSR) assessment to proactively identify significant risk related to asset and processes. VSR assessment-based actions are taken on top priority and are monitored for closure in our Business Safety Council meeting.

Few corrective actions implemented based on safety related incidents and HSE assessments are:

- o Vehicle tracking system implemented in all logistics vehicles
- o Central Logistic control room set up to continuously monitor our cascade vehicle operations
- o Several actions taken to reduce risk of overhead electrical lines near our assets such as making it underground/increasing its height with help of utility companies, installation of goal post, canopy installation over DRS etc.
- o Modular fire extinguisher installed in our remote DRS (District Regulating stations) to mitigate any emergency
- o Several other VSR assessment based corrective actions taken to minimize risk
- o Emergency Response Management System (ERMS) mobile based application was launched to improve emergency response in terms of reporting, managing the emergency and its analysis
- o Mobile based platform provided to our business partners for reporting of hazards, accessing training content and closing safety assessment observations.

Other HSE initiatives include as below

1. Safety Training

Basic safety induction, defensive driving training to drivers and Safety Technical & Operational Competency (STOC) training for Filler man, workers, labors are mandatory trainings. Training needs identification (TNI) is carried out for all employees as well as contractors. TNI based training is imparted. Safety training is also imparted to handle emergency situations effectively.

2. Reporting of Hazards

Any Near Miss incidents, unsafe acts/unsafe conditions observed in the workplace are being reported by the employees in the Gensuite application platform. Corrective actions and mitigation plan for the reported incident are taken accordingly. HSE safety alerts are shared with the employees to inform them about the cause of the incident along with safety guidelines to be followed to prevent recurrence of such incidents in future.

3. Learning from Incident

An incident reporting system is a key element in any system for learning lessons. Learning from incident ensures that lessons are learned from previous incidents so that similar incidents are prevented from occurring at work sites. Findings of incident is carried out by a process of incident investigation that ensures that underlying immediate cause and root cause of the incident is analyzed and concerned actions are taken for the same. Critical vulnerability factors of each site are listed down and follow-up actions are taken to reduce the safety risks.

4. Safety Audits

Safety Assurance audit are conducted internally for evaluating the effectiveness of occupational health and safety programs. The primary purpose is to identify health and safety hazards, assess the effectiveness of the measures in place to control those hazards. HAZOP, Environment & Social Impact Assessment and QRA study are carried out for various operation related to CGD. Corrective actions are taken for recommendation and observations found in the audit

Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders

1. Describe the processes for identifying key stakeholder groups of the entity.

At ATGL, any individual or group who can influence or are impacted by its business are considered stakeholders. The Company identified its important stakeholders by compiling a preliminary list of interested parties, taking into account historical issues and relationships, and holding discussions as needed. The list of key stakeholders include employees, suppliers, customers, business partners, regulatory agencies and local communities around its sites of operations.

2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Key identified stakeholders	Whether identified as Vulnerable and marginalized group(Yes/No)	Channel of communication	Frequency of engagement	Purpose and scope of engagement
Local Community	Yes	Community meetings through NGO implementation partners.	As per requirement.	Understanding needs and concerns of the community.
Employees	No	Newsletters, townhall meetings, intranet portal.	Continuous	Understanding any concerns of employees and communicating about key aspects related to employee wellbeing.
Suppliers	No	Supplier meets, meetings	Continuous	Understanding concerns of suppliers.
Customers	No	Website, and emails	Continuous	Understanding customer service requirements and any concerns.
Regulatory Agencies	No	Website, and emails	As per requirement.	Understanding concerns of regulatory.

Principle 5: Businesses should respect and promote human rights

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

Category	FY 2021-22 Current Financial Year			FY 2020-21 Previous Financial Year		
	Total (A)	No. employees of workers covered(B)	%(B/A)	Total(C)	No. employees of workers covered(D)	%(D/C)
Employees						
Permanent	420	420	100%	368	0	0%
Other than permanent	2	2	100%	2	0	0%
Total Employees	422	422	100%	370	0	0%
Workers						
Permanent	46	46	100%	57	0	0%
Other than permanent						

Our approach to human rights is guided by our Group's policy on Human Rights which is aligned to relevant national and international standards/protocols. We also have robust internal controls and procedures in place to ensure compliance with applicable labour laws including human rights.

The said Human rights policy extends to our business partners who are responsible to ensure compliance with the same and make sure that the workforce employed at different adani businesses are provided with relevant trainings to make them aware about their rights and obligations.

The Company also has a Supplier Code of Conduct (SCC) that covers various human rights aspects; all procurement agreements of the Company with critical suppliers include conditions pertaining to labour standards and occupational health and safety.

Although ATGL at present does not have a structured system of monitoring the training hours for the contract manpower, however, they are trained and sensitized about human rights through initiatives on labour practices and CSR activities.

We are also working on to further strengthen our existing approach to human rights training and engagement including setting up a digital platform for better tracking and recording of hours of trainings conducted on ESG including human rights for different category of employees including workers.

Note : As a part of our learning and development strategy we ensure that all the employees have access to Human Rights training and there are e-modules on the relevant topics in the learning management tools. The onboarding exercise for all new employees includes Human Rights awareness as part of their induction session. This induction session is held on monthly basis and focuses on aspects of Prevention of Sexual Harassment (POSH) and Code of Conduct.

2. Details of minimum wages paid to employees and workers, in the following format:

Category	FY 2021-22 Current Financial Year					FY 2020-21 Previous Financial Year				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No.(B)	%(B/A)	No.(C)	%(C/A)		No.(E)	%(E/D)	No.(F)	%(F/D)
Workers										
Permanent	420	-	-	420	100%	368	-	-	368	100%
Male	413	-	-	413	100%	361	-	-	361	100%
Female	7	-	-	7	100%	7	-	-	7	100%
Other than Permanent	2	-	2	2	100%	-	-	-	2	100%

Category	FY 2021-22					FY 2020-21				
	Current Financial Year					Previous Financial Year				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
No.(B)		%(B/A)	No.(C)	%(C/A)	No.(E)		%(E/D)	No.(F)	%(F/D)	
Male	2	-	-	2	100%	2	-	-	2	100%
Female	-	-	-	-	100%	-	-	-	-	0%
Workers										
Permanent	46	-	-	46	100%	57	-	-	57	100%
Male	43	-	-	43	100%	54	-	-	54	100%
Female	3	-	-	3	100%	3	-	-	3	100%
Other than Permanent	102	-	102	100%	-	-	-	-	86	100%
Male	102	-	-	102	100%	86	-	-	86	100%
Female	-	-	-	-	-	-	-	-	-	0%

3. Details of remuneration/salary/wages, in the following format:

Particulars	Male		Female	
	Number	Median remuneration/salary/wages of respective category	Number	Median remuneration/salary/wages of respective category
Board of Directors (BoD)	6	NA	2	NA
Key Managerial Personnel	3	₹2.89 crore	0	NA
Employees other than BoD and KMP	410	₹0.09 crore	7	₹0.09 crore
Workers	43	₹0.06 crore	3	₹0.04 crore

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes. We have a Grievance Redressal Committee, as outline in next response.

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

We have a grievance redressal mechanism which operates using an online tool known as Adani Grievance Management Tool. Employees can raise their grievances through the portal. The Grievance Redressal Committee (GRC). GRC Secretary receives and acknowledges the grievance. After review, the grievance is assigned to the investigator. The investigator conducts the investigation and records his/ her findings which are sent back to the GRC Secretary. GRC Secretary tables the findings before GRC Committee to arrive at a resolution of the grievance and responds to the user with details and resolution of the grievance.

6. Number of Complaints on the following made by employees and workers:

Category	FY 2021-22			FY 2020-21		
	Current Financial Year			Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Discrimination at workplace	Nil	Nil	Nil	Nil	Nil	Nil
Child Labour	Nil	Nil	Nil	Nil	Nil	Nil
Forced Labour / Involuntary Labour	Nil	Nil	Nil	Nil	Nil	Nil
Wages	Nil	Nil	Nil	Nil	Nil	Nil
Other human rights related issues	Nil	Nil	Nil	Nil	Nil	Nil

7. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

The POSH policy has the mechanism for addressing complaints pertaining to sexual harassment. All complaints related to sexual harassment are taken up by the Internal Complaint Committees (ICCs), which are governed under strict confidentiality and there are defined procedures to protect complainant from any retaliatory actions.

The employee can also raise any other grievances through the online grievance portal. The system is designed to redress the grievance within a defined timeline of 14 working days. The grievances are resolved in fair and time bound manner maintaining utmost confidentiality. However, no such cases of harassment and discrimination were reported during the financial year 2021-22. Employee Grievance Management Policy is made available on the website of ATGL, at following link: <https://www.adanigas.com/investors/corporate-governance>

8. Do human rights requirements form part of your business agreements and contracts? (Yes/No)

Yes, the Human rights related requirements are covered as a part of the vendor onboarding process through ARIBA portal.

9. Assessments for the year:

We have defined systems for ensuring compliance with regulatory requirements. There is a Code of Conduct for employees and Suppliers' Code of Conduct to ensure conformity with business ethics and human rights requirements. Also, the human rights criteria are screened through online ARIBA portal during vendor onboarding process.

In addition, we review compliance with these requirements during contract execution. In all our business units, it is mandatory to check the age proof documents at the time of recruitment to prevent employment of child labour and during the induction session essential business ethics and human rights related aspects are covered for creating awareness among employees.

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100%
Forced / involuntary labour	100%
Sexual harassment	100%
Discrimination at workplace	100%
Wages	100%
Others—please specify	100%

10. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.

Not Applicable.

Principle 6: Businesses should respect and make efforts to protect and restore the environment.**1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format#**

Parameter	FY 2021-22 Current Financial Year	FY 2020-21 Previous Financial Year
Total electricity consumption (A) in GJ	1,02,793	76,318
Total fuel consumption (B) in GJ	2,65,977	1,56,622
Energy consumption through other sources (C)	-	-
Total energy consumption (A+B+C) in GJ	3,68,770	2,32,940
Energy intensity per rupee of turnover (Total energy consumption/ turn over in rupees) in GJ per crore	115	131
Energy intensity (optional) – the relevant metric may be selected by the entity in GJ per SCM gas Sale	5.3×10^{-2}	4.02×10^{-2}

At several locations root top solar panel has been installed in FY 21-22. The energy generation from solar panel is having net-metered of main electricity meter, hence total electricity consumption is net of grid electricity consumption

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, this data has been subject to independent assurance by Intertek India Pvt. Ltd. and its report shall form part of this Integrated Annual Report.

2. **Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.**

No. The PAT scheme is not applicable to the Company's business.

3. **Provide details of the following disclosures related to water, in the following format#**

Parameter	FY 2021-22 Current Financial Year	FY 2020-21 Previous Financial Year
Water withdrawal by source (in kilolitres)		
(i) Surface water	Nil	Nil
(ii) Ground water	9,833	6,803
(iii) Third party water	17,878	15,954
(iv) Sea water / desalinated water	Nil	Nil
(v) Others	Nil	Nil
Total volume of water withdrawal (in kilo litres) (i+ii+iii+iv+v)	27,711	22,757
Total volume of water consumption (in kilolitres)		
Water intensity per rupee of turnover (Water consumed, KL / turnover in Cr)	8.64	12.75
Water intensity (optional)– the relevant metric may be selected by the entity in KL per SCM gas sales	3.98 x10 ⁻³	3.93 x 10 ⁻³

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, this data has been subject to independent assurance by Intertek India Pvt. Ltd. and its report shall form part of this Integrated Annual Report.

4. **Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.**

The water consumption is mainly for domestic purposes and not used in any process operation, hence there is no industrial effluent is discharged.

5. **Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:**

Parameter	Please specify unit	FY 2021-22 Current Financial Year	FY 2020-21 Previous Financial Year
NOx			
SOx			
Particulate Matter (PM)			
Persistent Organic Pollutants (POP)			
Volatile Organic Compounds (VOC)			
Hazardous Air Pollutants (HAP)			
Others–please specify			

6. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format#

Particulars	Unit	FY 2021-22 Current Financial Year	FY 2020-21 Previous Financial Year
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	1,53,167	1,22,638
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	22,564	16,960
Total Scope1 and Scope2 emissions in ton per Crore of turnover		54.81	78.23
Total Scope 1 and Scope 2 emission intensity (optional) –the relevant metric may be selected by the entity in ton per SCM gas sales		2.52 x10 ⁻²	2.41 x10 ⁻²

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, this data has been subject to independent assurance by Intertek India Pvt. Ltd. and its report shall form part of this Integrated Annual Report.

7. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.

1) **Solarization:**

ATGL commissioned its first solar plant in its city gas station situated in Ahmedabad (Gujarat, india) which yields 89kw of renewable energy every single day. 32 sites of ATGL (6 city gas stations , 24 CNG and 2 offices) have the provision of PV panels yielding 550kw which will extended to 50+ in the coming year with the ambition of 1Mw. The aim of the initiative is to minimize the business's Scope 2 emissions.

2) **Energy Audit:**

Electrical Energy Audit has been performed in 50 sites of ATGL (CNG stations, City Gas Stations and Offices).The first phase of audit was conducted in Faridabad (Haryana, India) Each site was evaluated with an objective to conserve electricity. Several energy saving recommendations like Installation of LED lights, AC energy saver, Occupancy sensors, Timer etc are being implanted, based on their viability and feasibility. This initiative is being promoted to ATGL customers as well.

3) **Decarbonization of Fleets:**

All ATGL owned and contracted transport including Transport LCV/HCV cascade, office , Area Emergency Office Vehicles are being converted from HSD to CNG. Around 50% of existing LCVs are CNG powered. ATGL has an ambition to increase the numbers further in coming years. This leap of ATGL is to minimize the predominant Scope 3 emissions.

4) **Methane Leak Detection & Repair:**

The Leak Detention and Repair (LDAR) program was implemented to comply with environmental regulations for reducing the methane emissions into the environment. A pilot was study conducted at Faridabad and Ahmedabad by Josler. The leaks detected are being fixed as Methane is 25 times higher in GHG emissions compared to CO2. This initiative was implemented to reduce minimize business's Scope 1 emissions.

8. Provide details related to waste management by the entity, in the following format:

Parameter	FY 2021-22 Current Financial Year	FY 2020-21 Previous Financial Year
Total Waste generated (in metric tonnes)		
Plastic waste(A)	0.88	0.17
E-waste(B)	0.38	-
Bio-medical waste(C)	-	-
Construction and demolition waste(D)	-	-
Battery waste(E)	22.14	1.05
Radio active waste(F)	-	-
Other Hazardous waste. Please specify, if any. (G) (Spent oil in KL)	28.05	21.17
Other Non-hazardous waste generated (H). (Metal Scrap and MDPI pipe)	183.19	84.04
Total (A+B + C + D + E + F + G + H)	234.64	106.43
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	Nil	Nil
(ii) Re-used	Nil	Nil
(iii) Other recovery operations	Nil	Nil
Total	Nil	Nil
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	Nil	Nil
(ii) Landfilling	Nil	Nil
(iii) Other disposal operations	Nil	Nil
Total	Nil	Nil

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, this data has been subject to independent assurance by Intertek India Pvt. Ltd. and its report shall form part of this Integrated Annual Report.

9. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

ATGL is having well established Environment Management System in place which is certified as per ISO 14001:2015. We have waste management procedures in place to address safe disposal of hazardous waste, e-waste and other waste.

The hazardous wastes are handled, segregated, stored and transported in accordance with applicable regulatory requirements and best industry practices. The hazardous waste is disposed of in an environmentally sound manner through authorized vendors for recycling as required by regulation.

This year we have replaced hazardous odorant Ethyl Mercaptant to less hazardous chemical Scentinel S20 as on Odorant

We have adopted milkman concept (delivery through tanker on need basis) for delivery of our odorant chemical which reduced the storage, handling & disposal of hazardous drums.

ATGL is working on prevention of single use plastic in its offices.

Five of our offices at Ahmedabad were certified by CII, as offices not using Single use plastic items.

10. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

Sr. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons there of and corrective action taken, if any.
Not Applicable			

11. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Weblink
Not Applicable					

12. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format.

Sr. No.	Specify the law / regulation/ guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
1.	Nil	Nil	Not Applicable	Not Applicable

Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

1. Number of affiliations with trade and industry chambers/ associations. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

Sr. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Natural Gas Society	National
2	Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
3	Federation of Indian Chambers of Commerce and Industry (FICCI)	National
4	Confederation of Indian Industry (CII)	National
5	Indian Biogas Association	National
6	Association of CGD Entities	National

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

Name of authority	Brief of the case	Corrective action taken
Nil	Nil	Nil

Principle 8: Businesses should promote inclusive growth and equitable development.

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

Name and brief details of project	SIA Notification No	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Not Applicable					

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In ₹)
Not Applicable					

3. Describe the mechanisms to receive and redress grievances of the community.

The CSR Head of the business unit is the key on-site personnel who can be reached out to in case of any complaints or grievances from the community members. The grievances can be submitted orally or in writing. Additionally, the Program Officers working under the supervision of the CSR Head regularly engage with community stakeholders to understand their perspectives on a given CSR initiative and seek feedback. Program Officers also serve as the first point of contact for the community members to submit and redress grievances on a one-to-one basis.

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

Parameter	FY 2021-22 Current Financial Year	FY 2020-21 Previous Financial Year
Directly sourced from MSMEs / small producers	27%	27%
Sourced directly from within the district and neighboring districts	The Company shall start monitoring and reporting this data in future.	

Principle 9: Businesses should engage with and provide value to their consumers in a responsible manner

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

At present ATGL has a 'Nodal officer' located in the Corporate Office, who is assisted by a team. ATGL has displayed and published contact details of customer care across all assets to facilitate lodging of complaints by the customers. Similarly details of customer care and nodal officer are available and published on ATGL website as well as on My Adani Gas mobile app. There are certain guidelines and norms for responding to complaints and formal complaint escalation matrix within the Company. When officials at the lower levels do not respond satisfactorily, then Company has formal avenues for the complainant (customer) to bring his / her grievance to the notice of responsible senior officials for early resolution.

ATGL also captures customer feedback on resolution of customer's complaints and timely analyses the same for further improvement in respective area.

ATGL provides different platforms to customer for lodging their complaints:

- Centralized call center
- Customer care offices
- Adani Gas Website
- My Adani Gas mobile application
- Chatbot on whats App, website, mobile app and all social media platforms

2. Turnover of products and/ services as a percentage of turnover from all products / service that carry information about:

Particulars	As a percentage to total turnover
Environmental and social parameters relevant to the product	NA
Safe and responsible usage	100
Recycling and/or safe disposal	NA

3. Number of consumer complaints in respect of the following:

Particulars	Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	Nil	NA
Advertising	Nil	Nil	NA
Cyber-security	Nil	Nil	NA
Delivery of essential services	Nil	Nil	NA
Restrictive Trade Practices	Nil	Nil	NA
Unfair Trade Practices	Nil	Nil	NA
Other	84,305	2,191	--

4. Details of instances of product recalls on account of safety issues:

Particulars	Number	Reasons for recall
Voluntary recalls	NA	NA
Forced recalls	NA	NA

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.

Yes, we have cyber security and data privacy policy in line with its commitment to establishing and improving cyber security preparedness and minimizing exposure to associated risks.

Weblink: <https://www.adanigas.com/investors/corporate-governance>

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

None.

Independent Limited Assurance Statement to Adani Total Gas Limited on their Business Responsibility & Sustainability Report FY2021-22

To
The Management of
Adani Total Gas Ltd., Ahmedabad, India

Introduction

Intertek India Private Limited ("Intertek") was engaged by Adani Total Gas Limited ("ATGL") to provide an independent limited assurance on its BRSR (Business Responsibility & Sustainability Report) for FY2021-22 ("the Report"). The scope of the Report comprises the reporting periods of FY2020-21 and FY2021-22. The Report is prepared by ATGL based on SEBI's (Securities and Exchange Board of India) BRSR guidelines. The assurance was performed in accordance with the requirements of International Federation of Accountants (IFAC) International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information.

Objective

The objectives of this limited assurance exercise were, by review of objective evidence, to confirm whether any evidence existed that the sustainability related disclosures, as declared in the Report, were not accurate, complete, consistent, transparent and free of material error or omission in accordance with the criteria outlined below.

Intended Users

This Assurance Statement is intended to be a part of the Annual Report of Adani Total Gas Limited.

Responsibilities

The management of ATGL is solely responsible for the development the Report and its presentation. Management is also responsible for the design, implementation and maintenance of internal controls relevant to the preparation of the Report so that it is free from material misstatement, whether due to fraud or error.

Intertek's responsibility, as agreed with the management of ATGL, is to provide assurance and express an opinion on the data and assertions in the Report based on our verification following the assurance scope and criteria given below. Intertek does not accept or assume any responsibility for any other purpose or to any other person or organization. This document represents Intertek's independent and balanced opinion on the content and accuracy of the information and data held within.

Assurance Scope

The Assurance has been provided for selected sustainability performance disclosures presented by ATGL in its Report. The assurance boundary included data and information for the operations in Ahmedabad and Adani Total Gas Ltd. (Corporate Office) in accordance with SEBI's BRSR guidelines. Our scope of assurance included verification of data and information on selected disclosures reported as summarized in the table below:

Section A: General Disclosures

Principle 3 (Businesses should respect and promote the well-being of all employees, including those in their value chains)

- Total number of permanent employees.
- Total number of other than permanent employees.
- Turnover rate for permanent employees.
- Percentage of women in Board of Directors (%).

- Percentage of employees covered by Health insurance, accidental insurance, maternity, and paternity benefits.
- Percentage of employees covered under retirement benefits (PF and Gratuity).
- Return to work and Retention rates of permanent employees that took parental leave.
- Number of employees covered under Skill upgradation and H&S trainings.
- Safety related indicators

Principle 6 (Businesses should respect and make efforts to protect and restore the environment)

- Total electricity consumption
- Total fuel consumption
- Total volume of water withdrawn
- Total Scope 1 emissions
- Total Scope 2 emission.
- Total hazardous waste generated
- Total non-hazardous waste generated
- Total waste recovered through recycling, re-using or other recovery operations
- Total waste disposed

Assurance Criteria

Intertek conducted the assurance work in accordance with requirements of 'Limited Assurance' procedures as per the following standard:

- International Standard on Assurance Engagements (ISAE) 3000 (revised) for 'Assurance Engagements other than Audits or Reviews of Historical Financial Information'.

A limited assurance engagement comprises of limited depth of evidence gathering including inquiry and analytical procedures and limited sampling as per professional judgement of assurance provider. A materiality level of 10% was applied. Assessment of compliance and materiality was undertaken against the stated calculation methodology and criteria.

Methodology

Intertek performed assurance work using risk-based approach to obtain the information, explanations and evidence that was considered necessary to provide a limited level of assurance. The assurance was conducted by desk review with regard to the reporting and supporting records for the fiscal year 2021 and

2022 at ATGLs corporate office in Ahmedabad. Our assurance task was planned and carried out during May-June 2022. The assessment included the following:

- Assessment of the Report that it was prepared in accordance with the SEBI's BRSR guidelines;
- Review of processes and systems used to gather and consolidate data;
- Examined and reviewed documents, data and other information made available at corporate office and digitally;
- Conducted physical interviews with key personnel responsible for data management;
- Assessment of appropriateness of various assumptions, estimations and thresholds used by ATGL for data analysis;
- Review of BRSR disclosures on sample basis for the duration from 1st April to 31st March of the years 2021 and 2022 for ATGL was carried out onsite at ATGLs corporate office;
- Appropriate documentary evidence was obtained to support our conclusions on the information and data reviewed;

Conclusions

Intertek reviewed selected BRSR disclosures provided by ATGL in its Report. Based on the data and information provided by ATGL, Intertek concludes with limited assurance that there is no evidence that the sustainability data and information presented in the Report is not materially correct. The report provides a fair representation of BRSR disclosures and is in accordance with the SEBI's BRSR guidelines to the best of our knowledge.

Intertek's Competence and Independence

Intertek is a global provider of assurance services with a presence in more than 100 countries employing approximately 44,000 people. The Intertek assurance team included Certified Sustainability Assurance Professionals, who were not involved in the collection and collation of any data except for this Assurance Opinion. Intertek maintains complete impartiality towards any people interviewed.

For Intertek India Pvt. Ltd

For Intertek India Pvt. Ltd.

Sumit Chowdhury

Technical Manager-Sustainability
Intertek Assuris

10th June 2022

Beth Mielbrecht

Project Director
Intertek Assuris

No member of the verification team (stated above) has a business relationship with Adani Total Gas Ltd. stakeholders beyond that is required of this assignment. No form of bribe has been accepted before, throughout and after performing the verification. The verification team has not been intimidated to agree to do this work, change and/or alter the results of the verification. The verification team has not participated in any form of nepotism, self-dealing and/or tampering. If any concerns or conflicts were identified, appropriate mitigation measures were put in place, documented and presented with the final report. The process followed during the verification is based on the principles of impartiality, evidence, fair presentation and documentation. The documentation received and reviewed supports the conclusion reached and stated in this opinion.