



Ports and
Logistics

September 1, 2022

BSE Limited

Floor 25, P J Towers,
Dalal Street,
Mumbai – 400 001

Scrip Code: 532921

Sub.: Submission of Business Responsibility and Sustainability Report

Dear Sir / Madam,

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 Ports and Special Economic Zone Limited

**Kamlesh Bhagia
Company Secretary**

Adani Ports and Special Economic Zone Ltd
Adani Corporate House, Shantigram,
Nr. Vaishno Devi Circle, S. G. Highway,
Khodiyar, Ahmedabad - 382421
Gujarat, India
CIN: L63090GJ1998PLC034182

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Business Responsibility and Sustainability Report

SECTION A : GENERAL DISCLOSURE

I. Details of the listed Entity

1	Corporate Identity Number (CIN) of the Listed Entity	L63090GJ1998PLC034182
2	Name of the Listed Entity	Adani Ports and Special Economic Zone Ltd. ("APSEZ/ Company")
3	Year of incorporation	1998
4	Registered office address	Adani Corporate House, Shantigram, Near Vaishno Devi Circle, S. G. Highway, Khodiyar, Ahmedabad-382421 Gujarat
5	Corporate address	Adani Corporate House, Shantigram, Near Vaishno Devi Circle, S. G. Highway, Khodiyar, Ahmedabad-382421 Gujarat
6	E-mail	investor.apsezl@adani.com
7	Telephone	+91 79 - 26565555
8	Website	www.adaniports.com
9	Financial year for which reporting is being done	FY 2021-22
10	Name of the Stock Exchange(s) where shares are listed	BSE Limited (BSE) & National Stock Exchange of India Limited (NSE)
11	Paid-up Capital	Paid up Equity Capital - ₹422.47 crore Paid up Preference Capital - ₹2.50 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	Mr. Charanjit Singh Head - ESG & IR Email: charanjit.singh@adani.com Phone: 079 - 25557712
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).	Consolidated 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	Transport and storage	Services incidental to land, water & air transportation	100

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

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Cargo handling incidental to water transport	52242	100

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	12 (including under-construction) ports & terminals and 6 logistics parks		
International	1 terminal under-construction in Colombo		

17. Markets served by the entity:

a. Locations	Number
National (No. of States)	All States
International (No. of Countries)	Global

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

We are not a manufacturing entity. We are in the business of managing cargo at the port.

c. A brief on types of customers:

APSEZ primarily serves B2B customers handling cargos, from dry cargo, liquid cargo, crude to containers. Its subsidiary, Adani Logistics Limited (ALL), operates inland container depots at Patli (Haryana) and Kilaraipur (Punjab) and Multi-Modal Logistics Parks (MMLP) at Kishangarh (Rajasthan), Malur Karnataka) and Kanech (Punjab). ALL is a diversified end-to-end logistics service provider with expertise in handling varied customer across segments like Retail, Industrial, Container, Bulk, Break-Bulk, Liquids, Auto and Grain Handling. Mundra Economic Hub at Mundra SEZ, offers investment options as the multi-product SEZ, Free Trade and Warehousing Zone (FTWZ) and Domestic Industrial Zone.

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)	2150	2116	98.4	34	1.6
Other than Permanent (E)	75	72	96.0	3	4.0
Total Employees (D+E)	2225	2188	98.3	37	1.7
WORKERS					
Permanent (F)	510	506	99.2	4	0.8
Other than Permanent (G)	1	1	100	0	0.0
Total Workers (F+G)	511	507	99.2	4	0.8

2. Differently abled Employees and workers:

Particulars	Total (A)	Male		Female	
		No. (B)	% (B/A)	No. (C)	% (C/A)
DIFFERENTLY ABLED EMPLOYEES					
Permanent (D)	1	1	100	0	0
Other than Permanent (E)	0	0	0	0	0
Total Differently abled employees (D+E)	1	1	100	0	0
DIFFERENTLY ABLED WORKERS					
Permanent (F)	0	0	0	0	0
Other than Permanent (G)	0	0	0	0	0
Total differently abled Workers (F+G)	0	0	0	0	0

19. Participation/Inclusion/Representation of women

	Total (A)	Number (B)	Percentage of Females % (B/A)
Board of Directors	10*	2	20
Key Management Personnel#	3	0	0

*Standalone for APSEZ

#As per Section 2(51) of the Companies Act 2013 & BRSR guidelines. Two of Key Management Personnel are also occupying the position of the Director

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

	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 Employee	264	6	9.54%	-	-	-	-	-	-
Permanent Workers*	20	0	0.71%	-	-	-	-	-	-

Voluntary turnover Nos./Rate

The turnover rate mentioned herein is for Permanent category of employees/workers as applicable. It excludes other than permanent category of employees/workers.

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)
Details Attached as Annexure 1				

VI. CSR Details

	Response
22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes
(ii) Turnover* for FY 2021-22 (in ₹ crore)	15,934
(iii) Net worth for FY 2021-22 (in ₹ crore)	38,643

*Operating revenue

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 FY 21-22			Previous Financial Year FY 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	9	0	NIL	5	0	NIL
Employees and workers	Yes	NIL	NIL	NIL	NIL	NIL	NIL
Customers	Yes	10	2	NIL	12	0	NIL
Value Chain Partners	Yes	NIL	NIL	NIL	NIL	NIL	NIL
Other (please specify)	Yes	NIL	NIL	NIL	NIL	NIL	NIL

Details related to Grievance Redressal Mechanism is given in our Integrated Annual Report FY22

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.	Biodiversity and Land Use	Risk	Our operations may have negative impact on marine biodiversity and land use. We have to minimize the severity and magnitude of these impacts. Risks related to biodiversity and land use could impact our reputation, market proposition, draw penalties from the regulators and affect our financial stability	<ul style="list-style-type: none"> ▪ We have developed site specific Biodiversity Management Plan for Mundra, Dhamra, Hazira, Kattupalli and Vizhinjam Ports. ▪ Development footprint is kept outside Eco-sensitive area. ▪ We have aligned five of our ports to Oil Spill Action plan in accordance with the National Oil Spill Disaster Contingency Plan (NOS-DCP), International Petroleum Industry Environmental Conservation Association. ▪ Assessment results of approved projects are required to be released on half-yearly basis to the relevant authorities. ▪ We have signed a CII-backed India Business and Biodiversity Initiative (IBBI). 	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)
2	Climate Change Adaptation & Mitigation	Risk	Our port operations are impacted by any natural phenomenon like cyclone, heavy rains, wind etc. Thus, without taking into account the impact that climate change will have on port infrastructure we will be placing our fundamental business asset at risk. 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.	<ul style="list-style-type: none"> ▪ We have completed physical risk assessment study for all our ports and have identified short and long term adaptation and mitigation measures for ports depending on identified risk. ▪ We have strengthened our water sourcing to avoid fresh water use and attempt to have multiple water sources at each location. These activities strengthen our business continuity planning. ▪ Focus on container business is influenced by the changing landscape of fossil fuels due to climate change. ▪ We target to become 'Green Ports Company' and also become carbon neutral by 2025. 	
3	Human Rights	Risk	Upholding human rights is essential to protecting organisation's communities, employees and other stakeholders and also to avoid regulatory liabilities.	<ul style="list-style-type: none"> ▪ APSEZ has fostered an inclusive culture free from discrimination and powered by diverse employee capabilities. ▪ The Company is committed to free and fair employment practices free of any harassment based on race, religion, colour, age, sexual orientation, national origin, disability or any other classification as mandated by local laws. ▪ The Company's commitment to human rights is reflected in its governance, procurement and social strategy. ▪ The Company has formalized Human Rights Policy aligned to UN Guiding Principles on Business and Human Rights. ▪ The Human Rights Policy applies to all stakeholders, including permanent and contractual employees, communities, consultants, trainees, subsidiaries and business partners. The Company has a zero-tolerance approach to human rights abuses and instituted mechanisms for remediation. ▪ To prevent child labour in the Company's business, we have installed a system-based entry (Cronos) and Aadhar checks for workers. ▪ The Company provided awareness and training on human rights guidelines to suppliers. ▪ APSEZ has developed human rights due diligence to identify and assess impacts and risks relating to human rights of employees, suppliers, customers and communities. 	

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)
				<ul style="list-style-type: none"> The Human Rights risk identification process covers our operation, value chain and new relations (mergers, acquisitions, joint ventures etc). Human Rights issues comprise child labor, forced labour, human trafficking, discrimination, equal remuneration, freedom of association and collective bargaining. The due diligence has been extended to employees, children, women, local communities, third party contracted workers, local communities, indigenous people and migrant workers. All the company's ports and offices were assessed on the basis of child labour, forced/involuntary labour, sexual harassment, discrimination at workplace and wages. 	
4.	Employee Health, Safety and Well-Being	Risk	Failure to ensure the health, safety and well-being of the Company's workforce can impact productivity. This can consequently affect our business operations, customer satisfaction and profitability.	<ul style="list-style-type: none"> The Company strives to foster a safe working environment and ensure Zero Harm. Hazards and risks are periodically identified, with mitigation plans devised for each. All ports are having ISO 45001: 2018 Safety Management System in place. Incentive of all executives in the management level at each site is linked to safety related incidents at that site. Additionally, safety trainings are provided to employees and workers on a regular basis to ensure their holistic well-being. 	
5	Business Ethics, Integrity and Transparency	Risk	Ethical conduct, integrity and transparent two-way communication with stakeholders is integral to ensuring regulatory compliance and building stakeholder trust.	<ul style="list-style-type: none"> The Company has instituted several policies and procedures on business ethics, integrity and transparency. Annual internal audits are being conducted to review the effective implementation of policies. 	
6	Risk Management	Risk	Devising appropriate risk mitigation strategies is integral to helping the Company leverage opportunities, stay ahead of the curve, and avoid shocks and disruptions to the business.	<ul style="list-style-type: none"> Risks, including ESG risks, are periodically identified and a systematic approach is defined to managing them. 	
7	Training and Development	Opportunity	Equipping the workforce with the requisite technical and behavioral skills, through regular trainings, helps the Company raise the bar on quality of its offerings and become increasingly future-ready.	<ul style="list-style-type: none"> Not applicable 	

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)
8	Environmental Disaster Preparedness	Risk	Acute environmental events have the potential to disrupt operations and the supply chain, inflict physical damage on the Company's facilities and drive-up operational costs.	<ul style="list-style-type: none"> Business continuity plans have been formulated. Additionally, environment-related risks are being identified, and mitigation plans are being devised. 	
9	Regulatory Compliance	Risk	Failure to comply with regulatory requirements can manifest in financial consequences for the company and erode stakeholder trust.	<ul style="list-style-type: none"> The Company has a robust set of environmental, social and governance-related policies to foster a culture of compliance within the organization. Disciplinary measures and reinforcement mechanisms have been defined as well. In addition, legal and functional teams also monitor the regulatory compliances across businesses at defined frequencies. 	
10	Anti-Bribery & Anti-Corruption	Risk	Preventing practices like bribery and corruption helps an organization to avoid liabilities, maintain stakeholder trust, and keep its leadership position.	<ul style="list-style-type: none"> The Company has instituted an Anti-Bribery and Anti-Corruption Policy, in addition to others like the Code of Conduct, Whistle Blower Policy and other ESG policies to mitigate this risk. 	
11	Talent Attraction and Retention	Opportunity	Employing and retaining the right talent helps organization deliver value to its customers and maintain its leadership position.	<ul style="list-style-type: none"> We have built a strong culture through acquiring right talent, providing engaging and motivating work environment, encouraging informed risk-taking, offering growth opportunities and developing future leaders from within, along with focus on building harmonious relationships between employees and ensuring stress free working environment. 	
12	Energy and Emissions Management	Risk	Controlling its energy consumption and emissions footprint is crucial to mitigate climate change. Adopting low-carbon technologies is also helping the organisation prepare for a future, which could bring more stringent legislation and taxation related to energy and emissions.	<ul style="list-style-type: none"> An Energy & Emission Management Policy has been instituted by the Company. It is designed to aid and formalize the Company's efforts to manage its energy consumption and emissions and align with country's goal to become net zero. Company has committed to become Carbon Neutral by 2025. We signed for the Science-Based Targets initiative (SBTi), becoming the first Indian port operator to commit to science-based emission reduction targets. 	
13	Labour Practices	Risk	Respecting human rights and ensuring sound labour practices allows the organisation to avoid regulatory action, avoid penalties, and empower its employees and workers.	<ul style="list-style-type: none"> The Company adheres to all the laws of the land, related to human rights and labour practices. No forced child or compulsory labour is deployed by the Company, and its policy framework nurtures a diverse, safe and empowered workforce. 	

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)
14	Community Development	Opportunity	Community development activities helps a company to create a positive impact on society by undertaking meaningful interventions to bring significant benefits to large sections of the society. The CSR efforts also help foster a more productive and positive work environment for employees.	<ul style="list-style-type: none"> On behalf of APSEZ, the Adani foundation has been striving to create sustainable opportunities for the marginalized communities by facilitating quality education, sustainable livelihood development, promoting a healthy society and supporting rural infrastructure development. Our outreach as of now has been to 2,409 villages in 16 States across India. With an aim to contribute to the holistic development of communities, we are contributing to the global agenda of meeting Sustainable Development Goals (SDGs). 	
15	Responsible Supply Chain	Opportunity	Sound ESG practices in the value chain help the organisation to support local businesses, reduce its indirect environmental impact, and promote good governance amongst partner organisations.	<ul style="list-style-type: none"> While onboarding, a new supplier has to sign a contract that includes terms and conditions w.r.t. to ESG related factors mentioned in our Supplier Code of Conduct 	
16	Economic Performance	Opportunity	Ensuring business profitability and strong economic performance helps deliver value to investors and reinvest in the growth of the business, employees, communities and other stakeholders.	-	

<https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Supplier-Code-of-Conduct.pdf>

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)	Y	Y	Y	Y	Y	Y	Y	Y	Y
	b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
	c. Web Link of the Policies, if available	https://www.adaniports.com/Investors/Corporate-Governance								
2	Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
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 APSEZ Sustainable Procurement Policy and 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.	<ul style="list-style-type: none"> ▪ UNGC ▪ ISO 27001:2013 ▪ ISO 14001:2015 ▪ ISO 45001:2018 ▪ ISO 9001:2018 ▪ ISO 28000:2017 ▪ IFC Performance Standards ▪ IBBI ▪ CEO Water Mandate ▪ IUCN 								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>The Company's commitment to contribute to sustainable development is well aligned with Adani Group's purpose of Nation Building that provides a guiding framework for investment in businesses that accelerate India's economic growth and enhance citizen wellbeing.</p> <p>We have worked to embed this sustainability commitment into our strategy, our business processes and decision-making. Some of our key ESG goals and ambitions include:</p> <p>Energy & Emission</p> <ul style="list-style-type: none"> ▪ Carbon neutrality by 2025, and net zero thereafter ▪ 100% RE share in total electricity by 2025 ▪ 50% Energy intensity reduction by 2025 vs. 2016 <p>Water and Waste</p> <ul style="list-style-type: none"> ▪ 60% reduction in water consumption intensity by 2025 vs. 2016 ▪ Single use plastic free sites (12 Ports + 4 ICDs + 14 Silo sites) by 2025 ▪ Zero waste to landfill for 12 ports by 2025 <p>Afforestation & Conservation</p> <ul style="list-style-type: none"> ▪ 5000 Ha Mangrove afforestation by 2025 ▪ 1200 Ha Terrestrial plantation by 2025 <p>Stakeholder Engagement</p> <ul style="list-style-type: none"> ▪ Employee Satisfaction Rate of 4.5/5 by 2025 ▪ Supplier Satisfaction Rate of 4.75/5 by 2025 ▪ Customer Satisfaction Rate of 4.75/5 by 2025 <p>Safety</p> <ul style="list-style-type: none"> ▪ Zero fatalities and Zero Incidents by 2025 <p>Employee Turnover</p> <ul style="list-style-type: none"> ▪ <4% Voluntary Attrition by 2025 								

Sr. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
6	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	<p>Performance till FY'22</p> <p>Energy & Emission</p> <ul style="list-style-type: none"> ▪ 20% RE share in total electricity ▪ 8% RE share in total energy ▪ 38% Energy intensity reduction* ▪ 45% Emission intensity reduction* <p>Water and Waste</p> <ul style="list-style-type: none"> ▪ 59% Water consumption intensity reduction* ▪ 6 Ports are Zero Waste to Landfill Certified ▪ Single Use Plastic (SUP) Free (9 Ports completed+4 ICDs in progress) <p>Afforestation</p> <ul style="list-style-type: none"> ▪ 3239 Ha Mangrove afforestation ▪ 1000 Ha Terrestrial plantation completed <p>*From base year</p> <p>Stakeholder Engagement</p> <ul style="list-style-type: none"> ▪ Employee Satisfaction Rate of 4.11 ▪ Supplier Satisfaction Rate of 4.1 ▪ Customer Satisfaction Rate of 4.1 <p>Safety</p> <ul style="list-style-type: none"> ▪ 0 Fatality (Employee + FTE on Contract) ▪ 3 Fatality (Contractors Worker) ▪ 50% reduction in fatality <p>Employee Turnover</p> <ul style="list-style-type: none"> ▪ 10.39% Voluntary Attrition 								
Governance, leadership and oversight										
7	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements	Refer to the CEO message in the Integrated Annual Report FY22								
8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	<p>The Board of the Company has constituted a Corporate Responsibility Committee (CRC) comprising solely of the Independent Directors to oversee strategies, activities and policies including environment, social, governance, health and safety, human talent management and related material issue and indicators in the global context and evolving statutory framework.</p> <p>At the corporate level, the implementation of sustainability agenda is carried out by the SLC (Sustainability Leadership Committee).</p>								

Sr. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9								
		<p>The said committee is responsible, interalia for:</p> <ol style="list-style-type: none"> Periodically conduct stakeholder assessment and their material interests, to enhance the effectiveness of sustainability initiatives and the implementation status. Review and approve any reporting on sustainability aspects to the public or government agencies. Implement industry best practices and standards, to ensure that the Company's sustainability strategy minimizes environmental impact and creates shared value in the long term for stakeholders Manage risks in all forms, by applying controls and testing their effectiveness against environmental risks and opportunities, social impacts, and activities related to stakeholder engagement The committee is also supported by Board Committees including CSRC (Corporate Social Responsibility Committee), SRC (Stakeholder Responsibility Committee) & RMC (Risk Management Committee). <table border="1"> <thead> <tr> <th>Name of Member</th> <th>Composition of Committee</th> </tr> </thead> <tbody> <tr> <td>Prof. G Raghuram DIN No: 01099026</td> <td>Chairman (Independent Director)</td> </tr> <tr> <td>Mr. G. K. Pillai DIN No: 02340756</td> <td>Member (Independent Director)</td> </tr> <tr> <td>Mr. P.S.Jayakumar DIN No: 01173236</td> <td>Member (Independent Director)</td> </tr> </tbody> </table>									Name of Member	Composition of Committee	Prof. G Raghuram DIN No: 01099026	Chairman (Independent Director)	Mr. G. K. Pillai DIN No: 02340756	Member (Independent Director)	Mr. P.S.Jayakumar DIN No: 01173236	Member (Independent Director)
Name of Member	Composition of Committee																	
Prof. G Raghuram DIN No: 01099026	Chairman (Independent Director)																	
Mr. G. K. Pillai DIN No: 02340756	Member (Independent Director)																	
Mr. P.S.Jayakumar DIN No: 01173236	Member (Independent Director)																	
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.	As mentioned above, the Board of the Company has constituted a Corporate Responsibility Committee comprising solely of the Independent Directors, which meets on a quarterly basis, and is highest authority responsible for decision making on sustainability related issues.																

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	Y	Y	Y	Y	Y	Y	Y	Y	Y	Quarterly								
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								

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									
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		

12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated

The entity does not consider the Principles material to its business (Yes/No)	NA
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	NA
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	NA
It is planned to be done in the next financial year (Yes/No)	NA
Any other reason (please specify)	NA

SECTION C: PRINIPLE WISE PERFORMANCE

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
Employees other than BoD and KMPs	72866* (Man Hrs)	Health & Safety, Working Condition, POSH, Information Security, Wellbeing Sustainability, Human Rights, Workplace diversity equity and inclusion, ESG, Policies, Code of Conduct, stakeholder partnering, HR, Industrial Relations, Conflict Management, Innovation, Digital Transformation, Grievance Management, Performance Feedback, Strategic orientation, Communication, Networking, Risk-Reward Management, Risk Management, Sustainability in Strategic Planning, Insider Trading, Water & Waste Management, Biodiversity Conservation & Management etc	100
Workers	170300# (Man Hrs)	Health & Safety, Working Condition, Sustainability, Human Rights, ESG, Policies, Code of Conduct, Supervisory Skills etc	100

*Total Man Hrs for on-roll employees

#Total Man Hrs for Contractors workforce

Note: For Board of Directors & KMP the indicator is not tracked separately. However training & awareness program on Risk Management, Human Rights, Prevention of Sexual Harassment at Workplace (POSH), Digital Transformation, ESG, Code of Conduct, Insider Trading, Workplace diversity equity and inclusion, ESG Policies, Compliance, etc are conducted

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

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

Non-Monetary

	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial Institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes / No)
Imprisonment	NIL	NIL	NIL	NIL	NA
Punishment	NIL	NIL	NIL	NIL	NA

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
Not Applicable	Not Applicable

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.

Yes. The Company has an Anti-Corruption and Anti-Bribery policy (ABAC) in place.

The Company is committed to upholding the utmost standards for transparency and accountability in all its operations and strives to attain its purpose through compliance with national and international legal and ethical requirements. The Company does not tolerate any form of bribery, embezzlement, or corruption, and will uphold all applicable laws countering these unethical practices.

The Company's ABAC Policy lays out the spirit and guiding principles for all stakeholders to ensure compliance with the applicable laws, rules, and regulations. The Company also complies with all applicable anti-money laundering laws wherever it does business, including any applicable registration and suspicious transaction reporting obligations.

The ABAC Policy applies to all dealings, transactions, and expenses for and on behalf of the Company. This policy applies to all stakeholders working for or acting on behalf of the Company or any of its subsidiaries, and such persons must adhere to this policy.

Weblink: <https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/AntiBribery--AntiCorruption-Guidelines.pdf>

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

	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:

	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	-	NIL	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	NIL	-	NIL	-

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

Leadership Indicator

1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year:

Total No of Awareness Programs held	Topic principles covered under training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes)#
Suraksha Samvad - 50+ Sampark - 177 Supplier Sustainability Assessment Survey - 840	Health & Safety, Working Condition, Sustainability, Human Rights, ESG, Policies, Code of Conduct, stakeholder partnering, HR, Industrial Relations etc	-

*Nos shown are value chain participant no on these programs & initiatives. For details on these programs and initiatives refer response to Question no. 6 of Leadership Indicator in Principle 3 and also Supplier section in Integrated Annual Report FY22

#Indicator is not tracked separately as of now

2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same.

Yes, Company has framed a Policy for Code of Conduct applicable for all the members of the Board of Directors and all the members of Senior Management of the Company, detailing the process and management of Conflict of Interest available at https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Code_of_Conduct.pdf

(See Section 6, Page 6-7).

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.

	Current FY 2021-22	Previous FY 2020-21	Details of improvements in environmental and social impacts
R&D*	-	-	Environment: Resource conservation, biodiversity conservation & improvement, emissions & overall GHG reduction, waste reduction Social: Livelihood improvement, improvement in health & wellbeing, community infrastructure improvement, community health improvement etc.
Capex*	209.69 (crore)	77 (crore)	

*We are not a manufacturing entity. We are in the business of managing cargo at the port. Hence R&D is not very significant. However, Company is making substantial capital investment in the areas of renewable installation, electrification of cranes & other equipments/machinery, electrification of rail route, water conservation, wastewater and waste management, emission reduction etc to minimize GHG emission, reduce waste, and conserve natural resources. Company is also carrying out various initiative for community & social welfare and impact assessment is carried out to evaluate outcome of social interventions. All these actions and initiatives are to improve environmental and social impacts.

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

Yes. APSEZ is committed to achieving its goals of lawful and fair business practices by integrating various ESG considerations such as the respect of human rights, business ethics, and environmental friendliness of products and services into its supply chain decision making. The Company has system, policies and procedure in place for sustainable sourcing. We are guided by our Sustainable Procurement Policy (<https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Sustainable-Procurement-Policy.pdf>) and Supplier Code of Conduct (<https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Supplier-Code-of-Conduct.pdf>) which covers sustainable sourcing requirement related to development of systems & process, products, and services (including office products).

For sustainable sourcing we consider the following in our procurement decisions

- Suppliers are operating their facilities in compliance with all applicable environmental laws, regulations, obligations, safeguards, and controls to prevent health and safety risks and with an endeavor to go beyond the compliances
- Suppliers strive to continually improve the environmental performance by setting objectives, targets, and processes for efficient use of natural

resources, energy, water, prevention on use of hazardous or toxic substances, waste minimization, emission reduction, and pollution prevention

- Supplier's measure, monitor and review the environmental performance of the organization at regular intervals and get it audited (internal/external) before communicating to relevant stakeholders.
- Suppliers ensure eco-friendly manufacturing with minimum and environmentally compatible/recyclable packaging.
- Suppliers conduct business activities with high ethical and moral standards and respect Human Rights considerations of other stakeholders, including their employees.
- Suppliers act responsibly with their stakeholders and collaborate and associate with them, particularly the local community for their development.
- Procurement of recycled/part recycled product with extended producer responsibility.
- Procurement of product with certification and eco-labels wherever applicable.

APSEZ believes that the development of its suppliers is imperative for its business growth. Therefore, the Company is committed to working with suppliers to inculcate APSEZ's Sustainable Procurement policy that focuses on - reduced use of toxic substances, conservation of natural resources, minimization of waste generation and release of pollutants/

emissions, maximizing reusability and recyclability across value chain, prohibiting the use of child labour, complying with applicable wage and hour laws, ensuring safe and healthy working environment for employees/ workers, ensuring safe/ clean/ secure accommodation to employees/workers, ensuring no discrimination on basis of race/ colour/ gender/ age/ nationality/ religion/ sexual orientation/ marital status/ citizenship/ disability/ medical condition and community welfare. Alongside, APSEZ is supporting its suppliers to develop and implement a Sustainable Procurement Policy at their end

Apart from Sustainable Procurement Policy and 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.

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.

The Company is in the port and infrastructure development sector, which provides services for cargo handling & logistic, operations & maintenance of port sector. Being a service industry, we don't have potential to reclaim our products for re-use and recycling of generated waste in our operations.

However, the Company complies with all applicable regulatory requirements pertaining to waste management. The Company has defined processes for managing waste at each of its sites/locations. As part of vision for Zero Waste, APSEZ has taken several initiatives in the handling and management of waste at all operating port locations by focusing on 5R principles of waste management i.e. Reduce, Reuse, Reprocess, Recycle and Recover. As part of the

initiative Mundra, Kattupalli, Ennore, Dhamra, Goa, and Tuna sites have achieved Zero Waste to Landfill Assurance Statement. All our operating ports are certified as Single Use Plastic (SUP) free.

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. In addition, we work with our customers to manage their wastes through appropriate channels. Waste collection and segregation systems are installed from the waterfront to the gate, enabling systematic waste handling. Hazardous waste (chemicals, sludge, oil etc.) collected from incoming vessels was channelised through a separate line, which is handed over to authorised third party dealers. Under the International Maritime Organisation's MARPOL 73/78 convention, vessels that call at our port deliver their waste safely to our facility at a nominal charge, in alignment with the 'polluter pays' principle.

Other Major initiatives include, reuse of treated sewage, recycling of paper, plastic, metal, E-waste, used oil etc., reprocess of food waste, STP & ETP sludge, oily cotton waste etc.

Our strategic intent is to eliminate or reduce the generation of waste to divert waste from disposal through reuse and recycling wherever possible.

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	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No.(D)	% (D/A)	No.(E)	% (E/A)	No. (F)	% (F/A)
Permanent employees											
Male	2116	2116	100	2116	100	NA	NA	2116	100	-	-
Female	34	34	100	34	100	34	100	NA	NA	-	-
Total	2150	2150	100	2150	100	34	1.6	2116	98.4	-	-
Other than Permanent employees											
Male	72	72	100	72	100	NA	NA	72	100	-	-
Female	3	3	100	3	100	3	100	NA	NA	-	-
Total	75	75	100	75	100	3	4	72	96	-	-

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.

At all our sites we 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	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No.(D)	% (D/A)	No.(E)	% (E/A)	No. (F)	% (F/A)
Permanent workers											
Male	506	506	100	506	100	NA	NA	506	100	-	-
Female	4	4	100	4	100	4	100	NA	NA	-	-
Total	510	510	100	510	100	4	0.8	506	99.2	-	-
Other than Permanent workers											
Male	1	1	100	1	100	NA	NA	1	100	-	-
Female	0	0	100	0	NA	NA	NA	NA	NA	-	-
Total	1	1	100	1	100	NA	NA	1	100	-	-

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

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 and deposited with the authority (Y/N/N.A.)
PF	100	100	Y	100	100	Y
Gratuity	100	100	Y	100	100	Y
ESI	100	100	Y	100	100	Y
Others - Pls specify	NIL	NIL	NA	NIL	NIL	NA

3. Accessibility of workplaces

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. We strongly promote equal opportunities for everyone, and we acknowledge the importance of having diverse and equitable work environment. We have designed workplaces for providing assistance or making changes to a position or workplace to enable employees with disabilities for carrying out their jobs.

Our Corporate office has 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. Our other locations also comply with all the national/local requirements to accommodate differently abled person and their needs.

All the Company's existing and new infrastructure has implemented comprehensive plan to address accessibility of workplaces for differently abled employees. Work areas, rest rooms, common areas and areas for movement in and around facilities have been designed with all accessibility aspects in mind.

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.

Yes. The Company is committed to delivering value through equality and to nurture and promote human diversity across its operations.

We promote an inclusive work culture of creating a supportive professional environment that promotes trust, empathy, and mutual respect. Our policy on Employment of Differently-abled People and Diversity and Inclusion has been developed in line with our commitment.

Weblink:

<https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Employment-of-Differently-abled-People---Guidelines---APSEZ.pdf>

<https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Diversity-and-Inclusion-Guidelines.pdf>

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	57	100	9	100

Gender	Permanent employees		Permanent workers	
	Return to work rate*	Retention rate	Return to work rate*	Retention rate
Female	0 (OUT OF 1)	NA	0	NA
Total	58	98.28	9	100

* Return to work nos are disclosed

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.

Permanent Workers	<p>Yes.</p> <p>An online grievance redressal mechanism is available for permanent employees and workers. 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.</p>
Other than Permanent Workers	<p>Yes.</p> <p>Workers that 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.</p>
Permanent Employees	<p>Yes.</p> <p>Apart from the on-line grievance redressal platform, the Company also has a policy on prevention, prohibition and redressal of sexual harassment of women at the workplace and has Internal Complaints Committees (ICCs) in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Members of the ICCs are responsible for conducting inquiries pertaining to such complaints.</p> <p>The Company, on a regular basis, sensitizes its employees on the prevention of sexual harassment at the workplace through workshops, group meetings, online training modules and awareness programs.</p>
Other than Permanent Employees	<p>Yes.</p> <p>Suppliers, Consultants, Retainers, Clients or any other parties that are 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.</p>

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

The Company does not have any employee associations. However, we recognize the right to freedom of association and does not discourage collective bargaining. Three collective bargaining agreements exist (No trade union).

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	2150	NIL	NIL	-	NIL	NIL
-Male	2116	NIL	NIL	-	NIL	NIL
-Female	34	NIL	NIL	-	NIL	NIL
Total Permanent Workers	510	NIL	NIL	-	NIL	NIL
-Male	506	NIL	NIL	-	NIL	NIL
-Female	4	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	2188	1495	68.3	2180	99.6	-	-	-	-	-
Female	37	28	75.7	37	100	-	-	-	-	-
Total	2225	1523	68.4	2217	99.6	-	-	-	-	-
Workers										
Male	507	318	62.7	177	34.9	-	-	-	-	-
Female	4	2	50	1	25	-	-	-	-	-
Total	511	320	62.6	178	34.8	-	-	-	-	-

*We didn't track the information in FY 2020-21 due to Covid restrictions and transition to online mode of working

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

We have a robust Performance Management process with an objective to establish utmost clarity in terms of the process to be followed at each step and what is expected from all the stakeholders involved. The process covers activities related to measuring performance of all employees as part of the year-end review, rating & promotion recommendation, moderation and individual feedback. We also have a performance review group (PRG) consisting of a group of people who discuss the performance and behavioral aspects of an individual.

All the employees undergo an annual performance appraisal process as determined by the Company.

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	2188	2083	95.20*	1974	1833	92.86
Female	37	30	81.01*	18	14	77.78
Total	2225	2123	94.96*	1992	1847	92.72
Workers						
Male	507	505	99.56	468	464	99.14
Female	04	04	100	2	1	50
Total	511	509	99.6	470	465	98.94

*Rest of the employees were not eligible for performance appraisal as per applicable service rules of 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, all our ports are certified with ISO 45001: 2018/ OSHAS 18001 "Management System". It is applicable to the company's entire operations/ employees as well as contractors or individuals under the company's supervision. It is developed in Consultation with workers and their representatives.

The Company has adopted and implemented the Adani Group's Safety Management System framework which is built on International Safety Standards such as ISO 45001, by integrating all critical business activities and applying principles, processes in order to provide safe and healthy workplaces across all Company's establishments, prevent work related injury and ill health, minimize risks and continuously improve safety performance.

Eight major elements of Adani Safety Management System are on performance orientation, executive commitment, teamwork orientation, employee empowerment and enlistment, scientific decision making, continual improvement, comprehensive and ongoing training, and unity of purpose.

The Company's businesses (covered in this report) are well aligned with Adani Safety Management System and have well defined internal controls to implement the safety requirements on the ground.

The sites/locations have also linked Adani Safety Management System with their existing Integrated

Management System (IMS), e.g., ISO 14001 (EMS), and ISO 45001 (OHSMS).

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

Process:

APSEZ 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 (HIRA) and Job Safety Analysis (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.

These interventions bring together an understanding of the potential upside and downside of all job and personal factors which can impact the organization with an objective to prevent injury, protect assets and add maximum sustainable value to all the activities and processes of the organization.

Governance:

Safety Management Committee is responsible for implementing process safety by conducting risk assessment {i.e. HAZOP study, PHA, HIRA etc.} for existing system and implementation of recommendations of assessment.

Capacity Building:

Many drives are taken across units to create awareness on identification of high-risk activities such as work at height, Confined Space, Lock Out Tag Out Try Out (LOTOTO) etc. and training on its standards. We acknowledge the fact that operations free from risks on health have the potential to escalate productivity also. Hence, we have processes in place to manage and monitor health risks of employees, right from the time of their first interaction with the company. We are having OH&S management system (as per the requirement of OHSAS 45001/ ISO 18001) for managing OH&S risks related to our activities, with HIRA in place for all activities and for every significant risk, appropriate control measure are implemented as per control measures hierarchy i.e. elimination, substitution, engineering, administration & Personal Protective Equipment (PPE).

Also refer OHS section of Integrated report for details of OHS governance, system/process, training, performance and related details.

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 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 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 (GENSUITE) on OH&S Reporting has been deployed by APSEZ. The Company access this platform through its machines as well as native and lite Mobile App version

Moreover, each site has suggestion boxes where employees, workers and business partners can report grievances, and suggestions for improving the safety performance. Employees and workers can also report incidents and inaction on the safety incident through a formal whistle blower portal, the details of which are displayed at each site.

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

Yes, the employees and workers have access to non-occupational medical and healthcare services. We care for our employees' and our business partners' health and well-being, and provide them with well-equipped hospitals across locations. We have some of the best medical insurance and accident coverage policies to help employees deal with medical emergencies. Periodic health check-ups and awareness sessions for all employees are conducted regularly. Not only the physical well-being, but the mental well-being of our employees is also taken care of. We conduct several programs across locations to help employees deal with stress and maintain a healthy work-life balance.

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	0	0.21
	*Workers	0.26	0.27
Total recordable work-related injuries	Employees	0 (LTI)	1 (LTI)
	Workers	45 (LTI-16, Fatal-3, MTC-26)	49 (LTI-16, Fatal-6, MTC-27)

Safety Incident/Number	Category	Current FY (2021-22)	Previous FY (2020-21)
No. of fatalities	Employees	0	0
	Workers	3	6
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

*Workers - Contractors workers

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

Health and Safety of our people is of utmost importance to us. To achieve this, we have adopted a shared responsibility approach, with increased engagements at all levels of workforce and strengthening the safety culture across all Company's businesses. We are taking steps to reduce reportable incidents, minimize injuries and regularly monitor the safety performance of our sites.

Our occupational health and safety management system is also well aligned with Adani Safety Management System framework and covers all employees, contractors, business associates, visitors and the community as well. In addition to that, all our sites are ISO 45001 (2018) certified.

As a part of our strategy to prevent health and safety related incidents, we have identified two focus areas which are contractor safety management (CSM) and operational discipline. CSM procedure provides support in manpower deployment whereas the operational discipline ensures that proper measures to eliminate hazards are taken at all our sites.

All our employees and contractors are provided with appropriate PPEs and it is ensured that they are not negligent in using them. We are providing job related training to our employees to perform given task safely along with display of do's and don'ts at prominent locations of the sites. Beside this, we have stringent work permit system in place. Toolbox talks, task briefing, job specific training, job hazard analysis and mock drill help us in building safety culture within our businesses.

Mental and emotional health is a core part of our work culture. In view of this, an emotional wellness program was launched as part of Adani Care- Our integrated suite of health and well-being services and support platform. As an inclusive health service, the program offers professional and confidential counselling for our employees. Family member of our employee can also avail these services at any time of the day and in any location.

We also have various rewards and recognition programs in place to appraise the champions of safety working in Company's businesses.

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	-	NIL	NIL	-
Health & Safety	NIL	NIL	-	NIL	NIL	-

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	100% of our sites are assessed on Health & Safety parameters as part of ISO 45001 audit
Working Conditions	100% of our sites are assessed on Working Conditions as part of our internal compliance program which is linked to the policies

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.

All incidents are investigated thoroughly as per APSEZ Safety Guidelines on Incident Reporting & Investigation and learning is shared across sites to ensure non-occurrence of the similar incidents. Also, employees and workers are encouraged to report maximum number of unsafe acts and conditions to eliminate such incidents.

LEADERSHIP INDICATORS

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

Yes. For Employees to safeguard and support them from uncertainties and during unfortunate times or distress, we have introduced 'Group Term Life Insurance' policy.

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

The entity ensures adherence to statutory compliances related to workers such as timely wage payment, and Provident fund. In case of non-compliances stringent actions are taken against defaulter business partner.

3. Provide the number of employees / workers having suffered high consequence work- related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/ workers (No. of fatalities)		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable Employment*	
	2022	2021	2022	2021
Employees	0	0	NA	NA
Workers**	3	6	*	*

*The indicator is not tracked separately as of now.

**Contractors workers

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

Yes, some of the highly qualified employees are retained as advisors after the retirement. During the employment, several skill upgradation programs are imparted to employees to facilitate continued employability.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed*
Health and safety practices	-
Working Conditions	-

*The indicator is not tracked separately. However assessment on Health and safety practices & working condition of value chain partners has been carried out details of which can be seen in Supplier section of Integrated Annual Report FY22

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

- Suraksha Samvad sessions were conducted with 50+ key major contractors from various sites during which detailed discussions were held with suppliers covering topics such as Safety Requirements & Standards of APSEZ and Introduction to Contractor Safety Management (CSM) Portal. Grievances were addressed. This initiative will continue into FY 2022-23 and the company aims to cover 100% contractors by the end of FY 2023.

- A supplier awareness initiative named Sampark was launched in March 2022 to communicate APSEZ's vision on Safety, Sustainability & HR and industrial relations requirements. The first session in March 2022 was attended by 177 participants. With more sessions planned, the company targets to cover 1000+ suppliers in FY23.
- The third edition of Supplier Sustainability Assessment survey was launched in February 2022 to gauge supplier compliance on ESG credentials including assessment of working condition and Health & Safety practices Any suggestions on improvement formed a part of the survey.

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.

We have identified our relevant stakeholder groups on the basis of factors impacting our business. Any individual or group of individuals or institution that adds value to the business chain of the Company is identified as a core stakeholder. This inter alia includes customers, suppliers, communities, government regulators, shareholders and employees. That said, identification of stakeholders is an on-going process. We proactively engage with our stakeholders on a regular basis. For long term ongoing projects, stakeholders are identified before initiation of the project, basis the geographical area of the project as well as through the baseline & need assessment that is conducted. For any new proposed project or expansion, we map and engage with all such stakeholders on a proactive basis, particularly through our CSR activities. Further, we have stakeholder management processes in place at all our locations.

Our stakeholder identification and prioritization process is based on inclusivity, materiality and responsiveness.

Our stakeholder groups have been majorly classified as:

Direct: Customers, Employees, Suppliers, Investors, Shareholders, Government, Local authorities and Neighboring Communities.

Indirect: Peers, Rating Agencies, Third Party Agencies, Associations, International Community, Media, Research Agencies, Citizens and NGOs.

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
Customers	No	Customer meet, online survey, e-mails, online grievance mechanism, reports, brochures, feedback mechanism, website, customer support cells	Quarterly, annually, as and when required	Service information, transaction, awareness, feedback, query, grievances
Employees	No	Online survey, magazines, e-mails, intranet, reports, website, online grievance mechanism, one-to-one interactions, Town Hall meetings and brochures, HR communication	Continuous, weekly, monthly, quarterly and annually	Career/ performance discussion, policy communication, team building
Suppliers	No	Online survey, e-mails, vendor meet, online grievance mechanism, site visits, one-to-one interactions, reports and website	Quarterly, annually, as and when required	Business info, transaction, awareness, training feedback, query, grievances

Key identified stakeholders	Whether identified as Vulnerable and marginalized group (Yes/No)	Channel of communication	Frequency of engagement	Purpose and scope of engagement
Community	Yes	Focused group discussions, one-to-one interactions, media, website, online grievance mechanism and field visits	As required	CSR, complaints, awareness
Investors, shareholders and third-party ESG rating agencies	No	Reports, website, investor meets, one-to-one interactions, annual general meeting (AGM) and online grievances mechanism, e-mails	Ongoing	Business sustainability, economic performance
Regulatory authorities	No	Reports, website, one-to-one interaction, events, e-mails, letters and meetings	Annually and as required	Compliance

LEADERSHIP INDICATORS

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

To guide our approach to stakeholder engagement, we have established Stakeholder Engagement Policy. The appointment of respective stakeholder representatives enables this exercise to be conducted more efficiently as these representatives' act as a channel to enable two-way engagement between the organization and stakeholders.

Consultation with the stakeholders is a continuous process. It is led by Leadership from the front through regular engagements at various platforms. There is continuous dialogue with the community stakeholders which are reviewed at Business Unit levels. Also, every two years through the third-party engagement, impact, baseline and need assessment, feedback from the stakeholders is taken. In addition to this through regular engagements at various platforms there is continuous dialogue with the stakeholders and the same is also presented to the Board. Also, this year Company has gone beyond the compliance part and have undertaken the perception study across our operational areas to get feedback and know the thoughts of our stakeholders.

Public consultations is also a part of the new project and expansion plans, where feedback and views of the stakeholders is considered for project design.

Corporate Responsibility Committee and Stakeholder Relationship Committee is responsible for structuring Sustainability Strategy and long-term goals & targets, also plays a key strategic role in all business decisions to ensure workplace safety, eliminating any potential damage to the environment, enhancing a commitment towards stakeholders, and maintaining Company's reputation as one of leading Ports company.

2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes. Business partners are encouraged to share inputs and feedback during various stakeholder interactions within our business. Stakeholder consultation is used to support and strengthen the Company's initiatives. Financial planning, CSR outflows, program designing, etc. is been taken up as per the materiality assessment.

We engage with selected stakeholders, identified on the principles of responsibility, influence, impact and dependency. Customised questionnaires for various stakeholder categories are developed to identify areas of concern or ongoing focus desired by stakeholders. This is to facilitate consultative process to ensure full

coverage of environmental, social and governance issues as well as the involvement of the personnel and management of APSEZ to address all stakeholder queries and grievances.

The results of the materiality survey are used to identify material topics, with the highest priority for stakeholders and the biggest estimated impact on Adani Port's business into high-high and high-medium priority areas. The responses included various stakeholders, such as senior/middle management employees, contract employees, suppliers etc.

3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/marginalized stakeholder groups.

The Company identifies the disadvantaged, vulnerable and marginalized stakeholders on an on-going basis. Any new proposed project or expansion is mapped by engaging the stakeholder proactively, specifically via CSR activities. A comprehensive stakeholder management and grievance mechanism exists at all our locations.

Company engages with the disadvantaged, vulnerable and marginalized stakeholders through various CSR programs with an aim to empower women and make them financially independent and also develop their skills towards leadership and economic enhancement. Various CSR initiatives undertaken be it for farmers, women, students, unemployed youth, etc.

Also, this year, Company supported vulnerable and marginalized stakeholders during pandemic and reached out to them through various CSR initiatives.

Please refer to the CSR section of our Annual Integrated Report FY22 for more details.

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 or workers covered (B)	% (B / A)	Total (C)	No. employees of workers covered (D)	% (D/C)
Employees						
Permanent	2,150	2,150	100	-	-	-
Other than permanent	75	75	100	-	-	-
Total Employees	2,225	2,736	100	-	-	-
Workers						
Permanent	510	510	100	-	-	-
Other than permanent	1	1	100	-	-	-
Total Workers	511	511	100	-	-	-

* Data for FY 2020-21 for the indicator is not tracked. However Human Right training & awareness is conducted on a regular basis and organizations policy/guidelines are kept on Company website and are displayed across facilities for easy access to all the stakeholders and as a mean of creating awareness.

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)
Employees										
Permanent	2150	NA	NA	2,150	100	-	-	-	-	-
Male	2116	NA	NA	2,116	100	-	-	-	-	-
Female	34	NA	NA	34	100	-	-	-	-	-
Other than Permanent	75	NA	NA	75	100	-	-	-	-	-
Male	72	NA	NA	72	100	-	-	-	-	-
Female	3	NA	NA	3	100	-	-	-	-	-
Workers										
Permanent	510	NA	NA	510	100	-	-	-	-	-
Male	506	NA	NA	506	100	-	-	-	-	-
Female	4	NA	NA	4	100	-	-	-	-	-
Other than Permanent	1	NA	NA	1	100	-	-	-	-	-
Male	1	NA	NA	1	100	-	-	-	-	-
Female	0	NA	NA	0	NA	-	-	-	-	-

* Data for FY 2020-21 for the indicator is not tracked.

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	2	440	0	NA
Key Managerial Personnel	3	440	0	NA
Employees other than BoD and KMP	2188	10.59	37	6.55
Workers	507	5.97	4	2.45

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. The Corporate Responsibility Committee is responsible for addressing human rights impacts or issues caused or contributed to by the business

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

Stakeholders can raise concerns pertaining to human rights issues as per Whistleblower Policy or by using online grievance management system available on Company website or by directly reaching to the Grievance redressal team through dedicated email - grievance.apsez@adani.com. Organization does not impede access to state-based judicial processes.

Business HR conducts periodic audits to ensure compliance with the Human Rights Policies and ensure any issues or impacts are addressed in the defined manner within the stipulated timeline.

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

	FY 2021-22 Current Financial Year			FY 2020-21 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	0	0	-	0	0	-
Discrimination at workplace	0	0	-	0	0	-
Child Labour	0	0	-	0	0	-
Forced Labour / Involuntary Labour	0	0	-	0	0	-
Wages	0	0	-	0	0	-
Other human rights related issues	0	0	-	0	0	-

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

APSEZ has zero tolerance towards discrimination, bullying, harassment and inappropriate or abusive conduct by its stakeholder groups. We include following points to prevent adverse consequences to the complainant in discrimination and harassment cases.

- To keep an eye on any harassment and discrimination cases within our company, the Corporate Responsibility Committee ensures a strategic alignment of sustainability and human rights with the business. The Risk Management Committee oversees the potential and actual risk pertaining to human rights at every stage of the project including merger and acquisition through human rights due diligence. Ultimate oversight for human rights resides with Board of Directors which are briefed on quarterly basis by the ESG Head.
- To make our stakeholder aware of relevant guidelines pertaining to human rights, we upload these on our Company website for easy access to all employees and stakeholders. Awareness and familiarization sessions for different sets of employee population are also conducted.

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

Yes, All the suppliers and vendors are required to adhere to APSEZ's Supplier Code of Conduct which provides comprehensive guiding principles and embodies our commitment to internationally recognized standards, including UN Global Compact, the core conventions of the International Labor Organization (ILO), United Nations' Universal Declaration of Human Rights and prevalent industry standards for our vendors and suppliers.

APSEZ has zero tolerance towards violation of human rights and keep a strict vigil on the policies and practices followed by the suppliers. Also, we try to enforce the best practices on human rights in our supply chain using the influence we have on our suppliers. Our expectation of respect for human rights from all our business partners is unambiguously conveyed at multiple levels of engagement. During the on-boarding process and later, the suppliers undergo third party audit of their operations for compliance with safe working condition requirements, avoidance of child and forced labour, environmental and social impacts, and human rights due diligence. The human rights aspects are also covered in-depth in our annual survey of the vendors and the training programs organised for them. In the survey, the suppliers are required to disclose their policy to avoid child labour, forced labour, workplace harassment, gender & ethnic discrimination and their human rights due diligence process. The suppliers are assessed on whether their policy is aligned with the requirements set by APSEZ for their suppliers and business partners.

9. Assessments for the year:

At all the operations of ASPEZ, a government issued age proof is required before any employment is provided. This eliminates the risk of child labour. Regular trainings are given to the employees on the business ethics and human rights. Also, there are Code of Conduct for employees and supplier and human rights assessment process for vendor onboarding through ARIBA.

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

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

We have completed the Human Rights assessment of employees, suppliers, customers and community and are now developing a plan to implement the key takeaways from the survey. Refer our Integrated Annual Report FY22 for details of the scope, coverage and assessment.

Leadership Indicator

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.

APSEZ fostered an inclusive culture free from discrimination and powered by diverse employee capabilities. The Company is committed to free and fair employment practices free of any harassment based on race, religion, colour, age, sexual orientation, national origin, disability or any other classification as mandated by local laws. The Company's commitment to human rights was reflected in its governance, procurement and social strategy.

APSEZ remained committed to uphold human rights across its value chain and its commitment was reflected in due diligence and implementation framework governed by the following policies:

- Adani Group policy on Human Rights
- Human Rights Guidelines
- Supplier Code of Conduct
- Corporate Social Responsibility Policy
- Stakeholder Engagement Policy
- Guidelines for employment of Differently abled people
- Business Responsibility Policy
- Group Guidelines on Prevention of Sexual Harassment of Women at Workplace
- Adani Group Code of Conduct Policy

In addition, following action has been taken/introduced during reporting year

- We conducted a human rights survey covering all the permanent employees.
- This year, we also asked employees about any workplace harassment, or discrimination faced by them, the effectiveness of the system to identify and report human rights issues, and the awareness of various means to report any abuse.
- Employee Grievance Management System has been launched at group level.
- The vendor onboarding process through ARIBA portal covers the Human rights related requirements. In addition, supplier/vendor sustainability and ESG assessment has Human Right component integrated

- Human Rights assessment has been carried out for customer & community
- Training & Awareness of Employees, Vendor, supplier

Details of Human Rights policy, system, procedure, assessment/survey has been provided in our Integrated Annual Report FY22

2. Details of the scope and coverage of any Human rights due-diligence conducted.

APSEZ developed human rights due diligence to identify and assess impacts and risks relating to human rights of employees, suppliers, customers and communities. The Human Rights risk identification process covered our operation, value chain and new relations (mergers, acquisitions, joint ventures etc). Human Rights issues comprised child labor, forced labor, human trafficking, discrimination, equal remuneration, freedom of association and collective bargaining. The due diligence extended to employees, children, women, local communities, third party contracted workers, local communities, indigenous people and migrant workers.

All the company's ports and offices were assessed on the basis of child labour, forced / involuntary labour, sexual harassment, discrimination at workplace and wages

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes. At our corporate offices, we have made special provisions for differently abled employees and workers in accordance with Rights of Persons with Disabilities Act, 2016. We strongly promote equal opportunities for everyone, and we acknowledge the importance of having diverse and equitable work environment. We have designed workplaces for providing assistance or making changes to a position or workplace to enable employees with disabilities for carrying out their jobs.

Our Corporate offices have 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. Our other locations also comply with all the national/local requirements to accommodate differently abled person and their needs.

All the Company's existing and new infrastructure has implemented comprehensive plan to address accessibility of workplaces for differently abled employees. Work areas, rest rooms, common areas and areas for movement in and around facilities have been designed with all accessibility aspects in mind.

4. Details on assessment of value chain partners

	% of value chain partners (by value of business done with such partners) that were assessed*
Sexual Harassment	-
Discrimination at workplace	-
Child Labour	-
Forced Labour/Involuntary Labour	-
Wages	-
Others - please specify	-

*We have completed the Human Rights assessment of employees, suppliers, customers and community and are now developing a plan to implement the key takeaways from the survey. Refer our Integrated Annual Report FY22 for details of the scope, coverage and assessment.

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.

We have completed the Human Rights assessment of employees, suppliers, customers and community and are now developing a plan to implement the key takeaways from the survey and assessment. Refer our Integrated Annual Report FY22 for details of the scope, coverage and assessment.

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	Unit	FY 2021-22 (Current Financial Year)	FY 2020-21 (Previous Financial Year)
Total electricity consumption (A)	GJ	1086392	990081
Total fuel consumption (B)	GJ	1712444	1439129
Energy consumption through other sources (C)	GJ	NIL	NIL
Total energy consumption (A+B+C)	GJ	2798837	2429210
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	GJ/Cr	155	167
Energy intensity (optional) - the relevant metric may be selected by the entity	NA	NA	NA

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 Ernst & Young 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 businesses.

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	347547	396180
(ii) Groundwater	221382	264120
(iii) Third party water	2174306	1188540
(iv) Seawater / desalinated water	1027249	1188540
(v) Others	1731042	1455633
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	5153979	4096833
Total volume of water consumption (in kilolitres)	4731107	4126000
Water intensity per rupee of turnover (Water consumed, KL / turnover in Cr)	0.26	0.28
Water intensity (optional) - the relevant metric may be selected by the entity	NA	NA

Third Party water includes - Third party Private & Public Utility

Others: Rain Water, Wastewater from other industries

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 Ernst & Young 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.

We ensure compliance with all applicable statutory obligations laid by Central and State Pollution Control Board. For locations, where zero discharge is mandated by Pollution Control Board, we have implemented and maintained adequate systems to ensure compliance. In other sites, we have mechanism in place to treat the sewage/effluent as per the statutory guidelines. After treatment, we utilize treated water for internal usage to the extent possible.

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	µg/m ³	20.55	-
SOx	µg/m ³	11.43	-
Particulate matter (PM)	µg/m ³	56.99	-
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others - please specify	-	-	-

*Average value represented. The air emission sources (stacks, chimneys etc.) are monitored on a defined frequency by an approved laboratory/ agency as mandated by the Central and respective State Pollution Control Boards. The details of air emissions are submitted to PCB annually in Form-5 (Annual Environment Statement).

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.

The Ambient Air Quality Monitoring (AAQM) is carried out in line to National Ambient Air Quality Standards (NAAQS) across sites in line to Environment Clearance obtained from MoEF&CC (Ministry of Environment Forest and Climate Change) & Consents obtained from SPCB (State Pollution Control Board). Ambient Air Quality and Stack emission monitoring reports are submitted regularly to SPCB and also to MoEF&CC as part of half yearly compliance reports. Six monthly monitoring reports are also kept on Company's website. The monitoring reports are reviewed by SPCB during their site visits and inspection as well. These are also audited as part of ISO-14001 certification twice internally and once by an external audit agency.

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

Parameter	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	129438	110394
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	193063	196160

Parameter	Unit	FY 2021-22 (Current Financial Year)	FY 2020-21 (Previous Financial Year)
Total Scope 1 and Scope 2 emissions per rupee of turnover	Mt of CO2/Cr of turnover	17.8	21.1
Total Scope 1 and Scope 2 emission intensity (optional) - the relevant metric may be selected by the entity	NA	NA	NA

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 Ernst & Young 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.

In line with APSEZ's target to become Carbon Neutral Port and SBTi commitment and to meet India's Climate Change (NDC) commitments of emission reduction, the Company has taken various initiatives such as:

- Replacing low energy efficient equipment with high energy efficient equipment
- Installing solar roof tops and other green energy projects
- Replacing fossil fuel-based vehicles by electric vehicles
- Optimization of energy consumption in office buildings
- Using digitization to improve monitoring and reduce losses
- Awareness creation related to energy conservation and GHG reduction
- Replacing high Global Warming Potential (GWP) refrigerant with lower GWP refrigerant

Various initiatives related to GHG emission reduction can be seen under environment stewardship section of our Integrated Annual Report FY22

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)	176.19	133.08
E-waste (B)	50.93	16.75
Bio-medical waste (C)	6.9	98.96
Construction and demolition waste (D)	0	315
Battery waste (E)	35.1	28.8
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G) (Spent oil in KL)	1052	776.02
Other Non-hazardous waste generated (H). Please specify, if any., Tons	11674.33	9351.28
Total (A+B + C + D + E + F + G + H)	12995.45	10719.89

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)*

Parameter	FY 2021-22 (Current Financial Year)	FY 2020-21 (Previous Financial Year)
Category of waste		
(i) Recycled	7036	5128.16
(ii) Re-used	99	909.56
(iii) Other recovery operations	4043	4278.99
Total	11178	10316.71
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)*		
Category of waste		
(i) Incineration	123.0	262.75
(ii) Landfilling	1694.42	140.43
(iii) Other disposal operations	0	0
Total	1817.42	403.18

*For further details refer Waste Management under Environment section of Integrated Annual Report FY22

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 Ernst & Young 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.

The Company is in the port and infrastructure development sector, which provides services for cargo handling & logistic, operations & maintenance of port sector. Being a service industry, we don't have potential to recycling of generated waste in our operations.

However, the Company complies with all applicable regulatory requirements pertaining to waste management. The Company has defined processes for managing waste at each of its sites/locations. As part of vision for Zero Waste, APSEZ has taken several initiatives in the handling and management of waste at all operating port locations by focusing on 5R principles of waste management i.e. Reduce, Reuse, Reprocess, Recycle and Recover. As part of the initiative Mundra, Kattupalli, Ennore, Dhamra, Goa, and Tuna sites have achieved Zero Waste to Landfill Assurance Statement. All our operating sites are certified as Single Use Plastic (SUP) free.

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

Other Major initiatives include, Reuse of treated sewage, Recycling of paper, plastic, metal, E waste, Used oil etc., Reprocess of food waste, STP & ETP sludge, Oily cotton waste etc.

Our strategic intent is to eliminate or reduce the generation of waste to divert waste from disposal through reuse and recycling wherever possible.

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 thereof and corrective action taken, if any.
1	All Ports & Terminals falls under Coastal Regulation Zone (CRZ) Area	Handling & Storage of Cargo	Yes

*Apart from CRZ there's no Eco Sensitive Areas (National Park, Sanctuary, biosphere reserve, wetlands, biodiversity hotspots) within our development footprint. However comprehensive Biodiversity Assessment is being carried out before setting up of facility as part of Environment Impact Assessment (EIA) studies and biodiversity impacts for both terrestrial & marine is studied in detail, impacts are identified and mitigation measures/management program is proposed based on identified impacts. For both construction and operation phase. The progress on management measures/EMP (Environment Management Plan) is being submitted to all the concerned regulatory authorities as part of half yearly compliance report and is also kept on Company's website at <https://www.adaniports.com/Downloads>

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

Environmental Impact Assessment is being carried out for all the projects/development facility in line to EIA Notification, 2006 (as amended) and copy of Environment clearance so obtained is being kept at Company website at <https://www.adaniports.com/Downloads> (refer Environment & CRZ Clearance under relevant port)

EIA studies and EC clearance in line to applicable law is ongoing for following projects during the Financial Year 2021-22, These projects are at different stages of approval.

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 Web link
Revised Master Plan development of MIDPL (Kattupalli)	EIA Notification 2006 (As amended)	14.09.2006*	Yes	Ongoing	project ongoing
Revised Master Plan of Water Front Development (Mundra)	EIA Notification 2006 (As amended)	14.09.2006*	Yes	Ongoing	project ongoing
Outer Harbour development of Hazira Port	EIA Notification 2006 (As amended)	14.09.2006*	Yes	Ongoing	project ongoing
Development of 1576.81 Ha industrial park /SEZ at Mundra	EIA Notification 2006 (As amended)	14.09.2006*	Yes	Ongoing	project ongoing
Proposed Utility Corridor (Road, Rail, pipeline, HT line and other utility) and LPG pipeline at Mundra	EIA Notification 2006 (As amended)	14.09.2006*	Yes	Ongoing	project ongoing

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 Web link
Proposed 18m 66KV Transmission Corridor at Mundra	EIA Notification 2006 (As amended)	14.09.2006*	Yes	Ongoing	project ongoing
Additional capital & maintenance dredging and disposal of dredge material at AKBTP Tuna	EIA Notification 2006 (As amended)	14.09.2006*	Yes	Ongoing	project ongoing
Creation of berthing and allied facilities off Tekra, near Tuna (AKBTPL)	EIA Notification 2006 (As amended)	14.09.2006*	Yes	Ongoing	project ongoing

* EIA Notification 2006 date

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.

Yes, the Company is 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.

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

Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY 2021-22 (Current Financial Year)	FY 2020-21 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A)	215454 (GJ)	128892 (GJ)
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	NIL	NIL
Total energy consumed from renewable sources (A+B+C)	215454 (GJ)	128892 (GJ)

Parameter	FY 2021-22 (Current Financial Year)	FY 2020-21 (Previous Financial Year)
From non-renewable sources		
Total electricity consumption (D)	870939 (GJ)	861190 (GJ)
Total fuel consumption (E)	1712444 (GJ)	1439129 (GJ)
Energy consumption through other sources (F)	NIL	NIL
Total energy consumed from non-renewable sources (D+E+F)	2583383 (GJ)	2300319 (GJ)

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 Ernst & Young and its report shall form part of this Integrated Annual Report.

2. Provide the following details related to water discharged:

Parameter	FY 2021-22 (Current Financial Year)	FY 2020-21 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	Nil	Nil
No treatment	NA	NA
With treatment - please specify level of Treatment	NA	NA
(ii) To Groundwater	Nil	Nil
No treatment	NA	NA
With treatment - please specify level of Treatment	NA	NA
(iii) To Seawater	Nil	Nil
No treatment	NA	NA
With treatment - please specify level of Treatment	NA	NA
(iv) Sent to third-parties	Nil	Nil
No treatment	NA	NA
With treatment - please specify level of Treatment	NA	NA
(v) Others	NA	NA
No treatment	NIL	NIL
With treatment - please specify level of Treatment	742047* (Physico-chemical, Biological, Filtration)	649720* (Physico-chemical, Biological, Filtration)
Total water discharged (in kilolitres)	742047	649720

*On land discharge after treatment and meeting the norms and utilization for horticulture, gardening purpose.

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 Ernst & Young and its report shall form part of this Integrated Annual Report.

3. Please provide details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Unit	FY 2021-22 (Current Financial Year)	FY 2020-21 (Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	4,71,649	3,48,341
Total Scope 3 emissions per rupee of turnover		26	24
Total Scope 3 emission intensity (optional) - the relevant metric may be selected by the entity		NA	NA

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 Ernst & Young and its report shall form part of this Integrated Annual Report.

4. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Apart from CRZ there's no Eco Sensitive Areas (NP, Sanctuary, biosphere reserve, wetlands, biodiversity hotspots) within our development footprint. However comprehensive Biodiversity Assessment is being carried out before setting up of facility as part of EIA studies and biodiversity impacts for both terrestrial & marine is studied in detail, impacts are identified and mitigation measures/management program is proposed based on identified impacts. For both construction & operation phase. The progress on management measures/EMP is being submitted to all the concerned regulatory authorities as part of Half yearly compliance report and is also kept on Company's website.

5. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
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Details of the initiative relation to energy conservation, emission reduction, resource efficiency, effluent and waste management are covered in Environment section of Integrated Annual Report FY22

6. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

All our ports are having on-site off site disaster management plan in place. The same is submitted to MoEF&CC as part of half yearly EC & CRZ compliance report. Mundra Port Onsite emergency plan can be seen at

https://www.adaniports.com/-/media/Project/Ports/PortsAndTerminals/Mundra-Documents/Environment-Compliance-Report/Current-Environment-Compliance-Report/5-EC-Compliance-Report_WFDP-2009_Apr-21-to-Sep-21.pdf (Annexure 13)

7. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

Vessels entering the port limit are not allowed to discharge any waste, bilge, ballast into the water. Company has provided waste reception facilities for the incoming vessels to avoid marine water pollution. PUC certification has been mandated for incoming vehicles to minimize emissions. Company is also working towards electrification of

railway lines to minimize emissions. Under the International Maritime Organisation's MARPOL 73/78 convention, vessels that call at our port deliver their waste safely to our facility at a nominal charge, in alignment with the 'polluter pays' principle.

Other details can be seen in Environment stewardship section of Integrated Annual Report FY22

8. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

Details of assessment of value chain partners for assessed for ESG has been provided under Supplier section in our Integrated Annual Report FY22

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	Confederation of Indian Industry (CII)	National
2	Federation of Indian Export Organizations (FIEO)	National
3	World Economic Forum (WEF)	National
4	Federation of Indian Chamber of Commerce and Industry (FICCI)	National
5	The Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
6	National Safety Council (NSC-Mumbai)	National
7	Ahmedabad Management Association (AMA)	State
8	Federation of Kutch Industries (FKI)	State
9	Hazira Area Industries Association (HAIA)	State
10	Gujarat Chamber of Commerce and Industry (GCCCI)	State
11	Southern Gujarat Chamber of Commerce & Industries (SGCCI)	State
12	Gujarat Safety Council - Vadodara (GSC)	State
13	Industrial Waste Management Association, Chennai (IWMA)	State

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
NA	NA	NA	NA	NA	NA

At APSEZ, we considered the success of our CSR activities as equally important as any other primary business objectives and committed to positively impact the communities directly and indirectly affected by our operations. As some of our operating locations were in areas where the poorest segments of Indian population lived, we were deeply conscious of our responsibility to dedicatedly contribute towards inclusive growth of those communities. We believed that everyone, regardless of who and where they were, deserved equitable access to opportunities and a fair chance to a better quality of life.

APSEZ had a group-wide strategy that directed our CSR activities. By giving strategic priority to CSR activities, we directly contributed towards the United Nations' Sustainable Development Goals (UN SDGs). In addition, we aligned all our activities to the CSR Policy with the aim of facilitating and guaranteeing their correct development and implementation, while ensuring long-term outcomes and impacts. With over 25 years of experience in catering to the changing needs of society, Adani Foundation, the CSR arm of Adani Group, continued to strongly move forward focusing on scaling integrated development efforts across India. Some of the key areas of focus for our CSR activities/programmes included education, community health and nutrition, sustainable livelihoods, community infrastructure development and addressing environmental concerns. Apart from universal aspects like Human Rights and Rights of Indigenous People, we brought issues specific to Indian scenario such as mitigating poverty and generating livelihoods into focus.

Company carried impact assessment of its CSR/social activities in the areas of Health, Livelihood & water conservation during the year. Details of Company's work under Corporate Social Responsibility and impact assessment is given in Corporate Social Responsibility chapter of Integrated Report for FY 2021-22.

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 ₹)
NA	NA	NA	NA	NA	NA

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

The Company's grievance reporting initiatives comprised a 24x7 grievance reporting mechanism through its website, dedicated telephone numbers and drop boxes at prominent locations. Several people across the company's sites (supervisors, seniors, and department heads) can be reached directly for reporting grievances. The Company provides communities with a grievance reporting system (recorded, reviewed, escalated and actioned upon within a timeframe). A Grievance Management System was implemented for the aggrieved to view status, resolution and feedback. The Company is further in the process of developing and roll out of an integrated Grievance Management System wherein all types of grievance will feed into one integrated system.

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

	FY 2021-22 Current Financial Year	FY 2020-21 Previous Financial Year
Directly sourced from MSMEs/ small producers	NA	
Sourced directly from within the district and neighbouring districts	26%	46%

Leadership Indicator

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)

Yes, Company has framed Sustainable Procurement Policy and has Supplier Code of Conduct which covers the aspect related to procurement/purchase from marginalized/vulnerable groups. For details refer Supply Chain section of our Integrated Annual Report FY22

(b) From which marginalized /vulnerable groups do you procure?

Local/regional suppliers and Local communities

(c) What percentage of total procurement (by value) does it constitute?

APSEZ is driving economic development by enhancing procurement processes for social and environmental gains. The procurement focus was not just on local development but a range of accrued benefits of lower costs, higher brand recognition and livelihood support. Local vendors generally employ hundreds unlikely to leave that city, delivering benefits for the local economy in which they are based. Utilising procurement more progressively and innovatively has facilitated the participation of small to medium sized enterprises (SMEs) in public procurement in support of common societal goals.

The Company's business model supports the ethos of - 'What is good for the country is good for us'. APSEZ's operations are dependent on vendors to execute its goal of being an end-to-end integrated logistics player. Local procurement therefore, is a key facet of the overall sustainable supply chain strategy. The Company aims to fulfil these aspirations without compromising standards. Some material supplies are procured centrally and through vendors from other parts of the country.

In FY2021-22, 63% of the Company's procurement was derived from local State vendors and 26% from the same district.

For further details refer Supply Chain section of our Integrated Annual Report FY22

5. Details of beneficiaries of CSR Projects:

Sr. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
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For details of CSR project & beneficiary kindly refer Corporate Social Responsibility section of our Integrated Annual Report FY22

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.**

Customers can reach-out with their complaints related to our services or payment transactions through mail or online portal and a time bound solution is provided to them. Besides, the company carries out customer satisfaction survey through deployment of internal resources on an annual basis and covers feedback of customers across all port locations. Based on the feedback necessary process improvements are undertaken.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	Not Applicable considering the nature of Company's product and services offerings
Safe and responsible usage	
Recycling and/or safe disposal	

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

	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0	NA
Advertising	0	0	NA
Cyber-security	0	0	NA
Delivery of essential services	0	0	NA

	Received during the year	Pending resolution at end of year	Remarks
Restrictive Trade Practices	0	0	NA
Unfair Trade Practices	0	0	NA
Other	0	0	NA

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

	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 place.

Weblink: <https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Adani-Cyber-Security-Policy.pdf>

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.

- APSEZ mitigation plan included a cyber-security program, Standard Operating Procedures across functions, cyber security awareness programs to employees and the development of business continuity plans
- Awareness programs on Information Security are available to all employees and wherever applicable to third parties e.g., Sub-contractors, consultants, vendors etc. and regular training is imparted to them

Leadership Indicators

1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).

Growth with Sustainability: <https://www.adaniports.com/Sustainability>

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

Corporate Governance: <https://www.adaniports.com/Investors/Corporate-Governance>

2. Provide the following information relating to data breaches:

- a. Number of instances of data breaches along-with impact: Nil
- b. Percentage of data breaches involving personally identifiable information of customers: Nil

Annexure-1

Holding, Subsidiary and Associate Companies (including joint ventures)

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	Adani Petronet (Dahej) Port Pvt. Ltd.	Subsidiary	74	Business Responsibility initiatives of the parent Company are applicable to the subsidiary companies to the extent that they are material in relation to the business activities of the subsidiaries.
2	The Adani Harbour Services Ltd.	Subsidiary	100	
3	Adani Hazira Port Ltd.	Subsidiary	100	
4	Adani Logistics Ltd.	Subsidiary	100	
5	Adani Murmugao Port Terminal Pvt. Ltd.	Subsidiary	100	
6	Adani Ennore Container Terminal Pvt. Ltd.	Subsidiary	100	
7	Adani Vizag Coal Terminal Pvt. Ltd.	Subsidiary	100	
8	Adani Kandla Bulk Terminal Pvt. Ltd.	Subsidiary	100	
9	Adani Vizhinjam Port Pvt. Ltd.	Subsidiary	100	
10	Shanti Sagar International Dredging Ltd.	Subsidiary	100	
11	The Dhamra Port Company Ltd.	Subsidiary	100	
12	Karnavati Aviation Pvt. Ltd.	Subsidiary	100	
13	Marine Infrastructure Developer Pvt Ltd.	Subsidiary	97	
14	Adani Kattupalli Port Ltd.	Subsidiary	100	
15	Mundra SEZ Textile and Apparel Park Pvt. Ltd.	Subsidiary	55.28	
16	Mundra International Airport Pvt. Ltd.	Subsidiary	100	
17	Adani Warehousing Services Pvt. Ltd.	Subsidiary	100	
18	Adani Hospitals Mundra Pvt. Ltd.	Subsidiary	100	
19	Madurai Infrastructure Pvt. Ltd.	Subsidiary	100	
20	HDC Bulk Terminal Ltd.	Subsidiary	100	
21	Adani Ports Technologies Pvt. Ltd.	Subsidiary	100	
22	EZR Technologies Pvt. Ltd.	Joint Venture	51	
23	Mundra Crude Oil Terminal Pvt. Ltd.	Subsidiary	100	
24	Adani Tracks Management Services Pvt. Ltd.	Subsidiary	100	
25	Adani Pipelines Pvt. Ltd.	Subsidiary	100	
26	Adani Gangavaram Port Pvt. Ltd.	Subsidiary	100	
27	Dighi Port Ltd.	Subsidiary	100	
28	Aqua Desilting Pvt. Ltd.	Subsidiary	100	
29	Adinath Polyfills Pvt. Ltd.	Subsidiary	100	
30	Adani Krishnapatnam Port Ltd.	Subsidiary	100	
31	Adani Krishnapatnam Container Terminal Pvt. Ltd.	Step down Subsidiary	100	
32	Adani KP Agriwarehousing Pvt. Ltd.	Joint Venture	74	

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)
33	Seabird Distriparks (Krishnapatnam) Pvt. Ltd.	Step down Subsidiary	100	
34	Hazira Infrastructure Ltd.	Step down Subsidiary	100	
35	Adani Agri Logistics Ltd.	Step down Subsidiary	100	
36	Adani Agri Logistics (Dahod) Ltd.	Step down Subsidiary	100	
37	Adani Agri Logistics (Samastipur) Ltd.	Step down Subsidiary	100	
38	Adani Agri Logistics (Darbhanga) Ltd.	Step down Subsidiary	100	
39	Blue Star Realtors Ltd.	Step down Subsidiary	100	
40	Dermot Infracon Pvt. Ltd.	Step down Subsidiary	100	
41	Adani NYK Auto Logistics Solutions Pvt. Ltd.	Joint Venture	51	
42	Dhamra Infrastructure Pvt. Ltd.	Step down Subsidiary	100	
43	Shankheshwar Buildwell Pvt. Ltd.	Step down Subsidiary	100	
44	Sulochana Pedestal Pvt. Ltd.	Step down Subsidiary	100	
45	NRC Ltd.	Step down Subsidiary	100	
46	Adani Logistics Services Pvt. Ltd.	Step down Subsidiary	98.39	
47	Adani Cargo Logistics Ltd.	Step down Subsidiary	98.39	
48	Adani Noble Pvt. Ltd.	Step down Subsidiary	98.39	
49	Adani Forwarding Agent Pvt. Ltd.	Step down Subsidiary	98.39	
50	Adani Logistics Infrastructure Pvt. Ltd.	Step down Subsidiary	98.39	
51	Adani Agri Logistics (MP) Ltd.	Step down Subsidiary	100	
52	Adani Agri Logistics (Harda) Ltd.	Step down Subsidiary	100	
53	Adani Agri Logistics (Hoshangabad) Ltd.	Step down Subsidiary	100	
54	Adani Agri Logistics (Satna) Ltd.	Step down Subsidiary	100	
55	Adani Agri Logistics (Ujjain) Ltd.	Step down Subsidiary	100	
56	Adani Agri Logistics (Dewas) Ltd.	Step down Subsidiary	100	
57	Adani Agri Logistics (Panipat) Ltd.	Step down Subsidiary	100	
58	Adani Agri Logistics (Katihar) Ltd.	Step down Subsidiary	100	
59	Adani Agri Logistics (Kotkapura) Ltd.	Step down Subsidiary	100	
60	Adani Agri Logistics (Kannauj) Ltd.	Step down Subsidiary	100	
61	Adani Agri Logistics (Barnala) Ltd.	Step down Subsidiary	100	
62	Adani Agri Logistics (Bathinda) Ltd.	Step down Subsidiary	100	
63	Adani Agri Logistics (Moga) Ltd.	Step down Subsidiary	100	
64	Adani Agri Logistics (Mansa) Ltd.	Step down Subsidiary	100	
65	Adani Agri Logistics (Nakodar) Ltd.	Step down Subsidiary	100	
66	Adani Agri Logistics (Raman) Ltd.	Step down Subsidiary	100	
67	Adani Warehousing Ltd.	Step down Subsidiary	100	
68	Adani Agri Logistics (Dhamora) Ltd.	Step down Subsidiary	100	
69	AYN Logistics Infra Pvt. Ltd.	Step down Subsidiary	100	
70	Abbot Point Operations Pty Ltd., Australia	Subsidiary	100	
71	Abbot Point Bulkcoal Pty Ltd., Australia	Step down Subsidiary	100	

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)
72	Coastal International Terminal Pte Ltd., Singapore	Subsidiary	100	
73	Adani Yangon International Terminal Company Ltd, Myanmar	Step down Subsidiary	100	
74	Anchor Port Holding Pte. Ltd.	Subsidiary	100	
75	Noble Port Pte Ltd., Singapore	Step down Subsidiary	100	
76	Pearl Port Pte Ltd., Singapore	Step down Subsidiary	100	
77	Adani Bangladesh Ports Private Limited, Bangladesh	Subsidiary	100	
78	Adani Logistics International Pte Ltd., Singapore	Step down Subsidiary	100	
79	Adani International Ports Holdings Pte Ltd., Singapore	Subsidiary	100	
80	Colombo West International Terminal (Private) Ltd.	Joint Venture	51	
81	Adani International Container Terminal Pvt. Ltd.	Joint venture	50	
82	Adani CMA Mundra Terminal Pvt. Ltd.	Joint venture	50	
83	Adani Total Pvt. Ltd.	Joint venture	50	
84	Dhamra LNG Terminal Pvt. Ltd.	Joint venture	50	
85	Total Adani Fuels Marketing Pvt. Ltd.	Joint venture	50	
86	Gangavaram Port Limited	Associate	41.90	
87	Dholera Infrastructure Pvt. Ltd.	Associate	49	
88	Dholera Port and Special Economic Zone Ltd.	Associate	49	
89	Mundra Solar Technopark Pvt. Ltd.	Associate	49	
90	Dighi Roha Rail Ltd.	Joint venture	50	
91	Gangavaram Port Services Pvt. Ltd.	Associate	41.90	