



Ports and  
Logistics

Ref No: APSEZL/SECT/2023-24/41

July 17, 2023

**BSE Limited**

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

**Scrip Code: 532921**

**National Stock Exchange of India Limited**

Exchange Plaza,  
Bandra Kurla Complex,  
Bandra (E), Mumbai – 400 051

**Scrip Code: ADANIPOINTS**

**Sub.: Submission of Business Responsibility and Sustainability Report**

Dear Sir / Madam,

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Business Responsibility and Sustainability Report for Financial Year (FY) 2022- 23, which also forms part of the Integrated Annual Report for FY 2022-23, submitted to the Exchanges vide letter no. APSEZL/SECT/2023-24/40 dated July 17, 2023.

Kindly take the same on your records.

Thanking you,

Yours faithfully,

**For Adani Ports and Special Economic Zone Limited**

**Kamlesh Bhagia**  
**Company Secretary**

Encl: As above

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 & 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 & Special Economic Zone Ltd. (APSEZL)
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	April 1, 2022 to March 31, 2023
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 ₹432.03 Cr. Paid up Preferential Capital ₹166.53 Cr.
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).	Disclosures under this report made on 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):

Sr. 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	46	1	47
International	2	0	2

\*(including under-construction locations)

17. Markets served by the entity:

a. Locations	Number
National (No. of States)	28
International (No. of Countries)	2

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

Not Applicable. We are not a manufacturing entity. We are a service providing company; in the business of managing cargo at the port and providing end to end logistics services.

#### c. A brief on types of customers:

APSEZL primarily serves B2B customers handling cargos, from dry cargo, liquid cargo, crude to containers. APSEZL provides integrated services in the ports, logistics and SEZ segment. It has a diverse range of customers, including businesses in the industrial, manufacturing, servicing, and agricultural sectors as well as those in the shipping, container handling, freight forwarding, oil and gas, and agricultural industries. These customers range from local companies to transnational corporations. Additionally, Adani also serves to government entities, institutions, and individuals.

Its subsidiary, Adani Logistics Limited (ALL), operates inland container depots, ALL is a diversified end-to-end logistics service provider with expertise in handling varied customers across segments like Retail, Industrial, Container, Bulk, Break-Bulk, Liquids, Auto and Grain Handling. Another subsidiary, Adani Agri Logistics Limited (AALL), provides storage infrastructure (silos) build for agricultural produce by agri-logistics and is certified with Food Safety Management systems (ISO 22000:2018).

### 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)
<b>EMPLOYEES</b>					
Permanent (D)	2503	2439	97	64	3
Other than Permanent (E)	91	86	95	5	5
<b>Total Employees (D+E)</b>	<b>2594</b>	<b>2525</b>	<b>97</b>	<b>69</b>	<b>3</b>
<b>WORKERS</b>					
Permanent (F)	456	453	99	3	1
Other than Permanent (G)	2	1	50	1	50
<b>Total Workers (F+G)</b>	<b>458</b>	<b>454</b>	<b>99</b>	<b>4</b>	<b>1</b>

2. Differently abled Employees and workers:

Particulars	Total (A)	Male		Female	
		No. (B)	% (B/A)	No. (C)	% (C/A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>					
Permanent (D)	5	5	100	0	0
Other than Permanent (E)	0	0	0	0	0
<b>Total Differently abled employees (D+E)</b>	<b>5</b>	<b>5</b>	<b>100</b>	<b>0</b>	<b>0</b>
<b>WORKERS</b>					
Permanent (F)	0	0	0	0	0
Other than Permanent (G)	0	0	0	0	0
<b>Total differently abled Workers (F+G)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

19. Participation/Inclusion/Representation of women

	Total (A)	Percentage of Females	
		Number (B)	Percentage of Females % (B/A)
Board of Directors	10	1	10
Key Management Personnel	3	0	0

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

	FY 2022-23 (Turnover rate in current FY)			FY 2021-22 (Turnover rate in previous FY)			FY 2020-21 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employee	12.82%	0.36%	13.18%	12%	0	12%	-	-	-
Permanent Workers	5%	0	5%	4%	0	4%	-	-	-

**V. Holding, Subsidiary and Associate Companies (including joint ventures)**

21. Names of holding / subsidiary / associate companies / joint ventures

S. 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 Ltd.	Subsidiary	74%	Yes
2	The Adani Harbour Services Ltd. ("TAHSL")	Subsidiary	100%	Yes
3	Ocean Sparkle Ltd. ("OSL")	Subsidiary	98.52% (74.21% by TAHSL + 24.31% by Savi Jana)	Yes
4	Savi Jana Sea Foods Pvt. Ltd. ("Savi Jana")	Subsidiary	100% (TAHSL)	Yes
5	Sea Sparkle Harbour Service Ltd.	Subsidiary	100% (OSL)	Yes
6	Sparkle Port Service Ltd.	Subsidiary	100% (OSL)	Yes
7	Sparkle Terminal & Towage Service Ltd.	Subsidiary	100% (OSL)	Yes
8	Adani Hazira Port Ltd. ("AHPL")	Subsidiary	100%	Yes
9	Adani Logistics Ltd. ("ALL")	Subsidiary	100%	Yes

S. 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)
10	Adani Murmugao Port Terminal Pvt. Ltd.	Subsidiary	100%	Yes
11	Adani Ennore Container Terminal Pvt. Ltd.	Subsidiary	100%	Yes
12	Adani Vizag Coal Terminal Pvt. Ltd.	Subsidiary	100%	Yes
13	Adani Kandla Bulk Terminal Pvt. Ltd.	Subsidiary	100%	Yes
14	Adani Vizhinjam Port Pvt. Ltd.	Subsidiary	100%	Yes
15	Shanti Sagar International Dredging Ltd.	Subsidiary	100%	Yes
16	The Dhamra Port Company Ltd. ("DPCL")	Subsidiary	100%	Yes
17	Karnavati Aviation Pvt. Ltd.	Subsidiary	100%	Yes
18	Karaikal Port Pvt. Ltd.	Subsidiary	100%	Yes
19	Marine Infrastructure Developer Pvt Ltd. ("MIDPL")	Subsidiary	97%	Yes
20	Adani Kattupalli Port Ltd.	Subsidiary	100%	Yes
21	Mundra SEZ Textile and Apparel Park Pvt. Ltd.	Subsidiary	55%	Yes
22	Mundra International Airport Pvt. Ltd.	Subsidiary	100%	Yes
23	Adani Warehousing Services Pvt. Ltd.	Subsidiary	100%	Yes
24	Adani Hospitals Mundra Pvt. Ltd.	Subsidiary	100%	Yes
25	Madurai Infrastructure Pvt. Ltd.	Subsidiary	100%	Yes
26	HDC Bulk Terminal Ltd.	Subsidiary	100%	Yes
27	Adani Aviation Fuels Ltd.	Subsidiary	100%	Yes
28	Adani Ports Technologies Pvt. Ltd. (Formerly, Mundra International Gateway Terminal Pvt. Ltd.) ("APTPL")	Subsidiary	100%	Yes
29	EZR Technologies Pvt. Ltd.	Joint Venture	51% (APTPL)	Yes
30	Tajpur Sagar Port Ltd.	Subsidiary	100%	Yes
31	Mundra Crude Oil Terminal Pvt. Ltd. (Formerly, Adani Bhavanapadu Port Pvt. Ltd.)	Subsidiary	100%	Yes
32	Adani Tracks Management Services Pvt. Ltd. (Formerly, Sarguja Rail Corridor Pvt. Ltd.)	Subsidiary	100%	Yes
33	Adani Container Terminal Ltd. (Formerly, Adani Pipelines Pvt. Ltd.)	Subsidiary	100%	Yes
34	Adani Gangavaram Port Ltd.	Subsidiary	100%	Yes
35	Adani Container Manufacturing Ltd. (Formerly, Adani Cargo Logistics Ltd.)	Subsidiary	100%	Yes
36	Adani Bulk Terminals (Mundra) Ltd. (Formerly, Adani Agri Logistics (Bathinda) Ltd.)	Subsidiary	100%	Yes

S. 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)
37	Dighi Port Ltd. ("DPL")	Subsidiary	100%	Yes
38	Dighi Roha Rail Ltd.	Joint Venture	50% (DPL)	Yes
39	Aqua Desilting Pvt. Ltd.	Subsidiary	100%	Yes
40	Adinath Polyfills Pvt. Ltd.	Subsidiary	100%	Yes
41	Gangavaram Port Services (India) Private Limited	Subsidiary	100%	Yes
42	Adani Krishnapatnam Port Ltd. ("AKPL")	Subsidiary	100%	Yes
43	Adani Krishnapatnam Container Terminal Pvt. Ltd.	Subsidiary	100% (AKPL)	Yes
44	Adani KP Agriwarehousing Pvt. Ltd.	Joint Venture	74% (AKPL)	Yes
45	Seabird Distriparks (Krishnapatnam) Pvt. Ltd.	Subsidiary	100% (AKPL)	Yes
46	Hazira Infrastructure Ltd.	Subsidiary	100% (AHPL)	Yes
47	Adani Agri Logistics Ltd. ("AALL")	Subsidiary	100% (ALL)	Yes
48	Adani Agri Logistics (Dahod) Ltd.	Subsidiary	100% (ALL)	Yes
49	Adani Agri Logistics (Samastipur) Ltd.	Subsidiary	100% (ALL)	Yes
50	Adani Agri Logistics (Darbhanga) Ltd.	Subsidiary	100% (ALL)	Yes
51	Blue Star Realtors Ltd.	Subsidiary	100% (ALL)	Yes
52	Dermot Infracon Pvt. Ltd.	Subsidiary	100% (ALL)	Yes
53	Adani NYK Auto Logistics Solutions Pvt. Ltd.	Joint Venture	51% (ALL)	Yes
54	Dhamra Infrastructure Pvt. Ltd.	Subsidiary	100% (DPCL)	Yes
55	Shankheshwar Buildwell Pvt. Ltd.	Subsidiary	100% (ALL)	Yes
56	Sulochana Pedestal Pvt. Ltd. ("SPPL")	Subsidiary	100% (ALL)	Yes
57	Adani Forwarding Agent Pvt. Ltd.	Subsidiary	100% (ALL)	Yes
58	AYN Logistics Infra Pvt. Ltd. (Formerly, AYN Holdings and Investments Pvt. Ltd.)	Subsidiary	100% (ALL)	Yes
59	Adani Logistics Services Pvt. Ltd. ("ALSPL")	Subsidiary	98.39% (ALL)	Yes
60	NRC Ltd.	Subsidiary	100% (SPPL)	Yes
61	Adani Noble Pvt. Ltd.	Subsidiary	100% (ALSPL)	Yes
62	Adani Logistics Infrastructure Pvt. Ltd.	Subsidiary	100% (ALSPL)	Yes
63	Saptati Build Estate Pvt. Ltd.	Subsidiary	100% (AALL)	Yes
64	Adani Agri Logistics (MP) Ltd.	Subsidiary	100% (AALL)	Yes
65	Adani Agri Logistics (Harda) Ltd.	Subsidiary	100% (AALL)	Yes
66	Adani Agri Logistics (Hoshangabad) Ltd.	Subsidiary	100% (AALL)	Yes
67	Adani Agri Logistics (Satna) Ltd.	Subsidiary	100% (AALL)	Yes
68	Adani Agri Logistics (Ujjain) Ltd.	Subsidiary	100% (AALL)	Yes
69	Adani Agri Logistics (Dewas) Ltd.	Subsidiary	100% (AALL)	Yes
70	Adani Agri Logistics (Panipat) Ltd.	Subsidiary	100% (AALL)	Yes

S. 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)
71	Adani Agri Logistics (Katihar) Ltd.	Subsidiary	100% (AALL)	Yes
72	Adani Agri Logistics (Kotkapura) Ltd.	Subsidiary	100% (AALL)	Yes
73	Adani Agri Logistics (Kannauj) Ltd.	Subsidiary	100% (AALL)	Yes
74	Adani Agri Logistics (Barnala) Ltd.	Subsidiary	100% (AALL)	Yes
75	Adani Agri Logistics (Moga) Ltd.	Subsidiary	100% (AALL)	Yes
76	Adani Agri Logistics (Mansa) Ltd.	Subsidiary	100% (AALL)	Yes
77	Adani Agri Logistics (Nakodar) Ltd.	Subsidiary	100% (AALL)	Yes
78	Adani Agri Logistics (Raman) Ltd.	Subsidiary	100% (AALL)	Yes
79	Adani Warehousing Ltd. (Formerly, Adani Agri Logistics (Borivali) Ltd.)	Subsidiary	100% (AALL)	Yes
80	Adani Agri Logistics (Dhamora) Ltd.	Subsidiary	100% (AALL)	Yes
81	Adani Agri Logistics (Sandila) Limited	Subsidiary	100% (AALL)	Yes
82	Adani Agri Logistics (Gonda) Limited	Subsidiary	100% (AALL)	Yes
83	Adani Agri Logistics (Chandari) Limited	Subsidiary	100% (AALL)	Yes
84	Adani Agri Logistics Kathiar Two Limited	Subsidiary	100% (AALL)	Yes
85	PU Agri Logistics Limited	Subsidiary	100% (AALL)	Yes
86	BU Agri Logistics Limited	Subsidiary	100% (AALL)	Yes
87	HM Agri Logistics Limited	Subsidiary	100% (AALL)	Yes
88	Abbot Point Operations Pty Ltd., Australia ("APOPL")	Subsidiary	100%	Yes
89	Abbot Point Bulkcoal Pty Ltd., Australia	Subsidiary	100% (APOPL)	Yes
90	Coastal International Terminals Pte Ltd (Formerly, Adani International Terminals Pte. Ltd.), Singapore ("CITPL")	Subsidiary	100%	Yes
91	Adani Yangon International Terminal Company Ltd, Myanmar	Subsidiary	100% (CITPL)	Yes
92	Anchor Port Holding Pte Ltd. (Formerly, Adani Mundra Port Holding Pte. Ltd.), Singapore ("APHPL")	Subsidiary	100%	Yes
93	Noble Port Pte Ltd., Singapore (Formerly, Adani Abbot Port Pte Ltd., Singapore)	Subsidiary	100% (APHPL)	Yes
94	Pearl Port Pte Ltd., Singapore (Formerly, Adani Mundra Port Pte Ltd., Singapore)	Subsidiary	100% (APHPL)	Yes
95	Adani Bangladesh Ports Private Limited, Bangladesh	Subsidiary	100%	Yes
96	Adani International Ports Holdings Pte Ltd, Singapore ("AIPH")	Subsidiary	100%	Yes
97	Colombo West International Terminal (Private) Ltd., Sri Lanka	Subsidiary	51% (AIPH)	Yes

S. 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)
98	Mediterranean International Ports A.D.G.D Ltd, Israel ("Mediterranean")	Subsidiary	70%	Yes
99	Haifa Port Company Ltd.	Subsidiary	100%	Yes
100	Sparkle Overseas Pte Ltd. ("SOPL")	Subsidiary	100% (OSL)	Yes
101	Khimji Sparkle Marine Services, SAOC	Subsidiary	49% (SOPL)	No
102	The Adani Harbour International DMCC, UAE	Subsidiary	100% (TAHSL)	Yes
103	Port Harbour Services International Pte. Ltd, Singapore	Subsidiary	100% (TAHSL)	Yes
104	Adani International Container Terminal Pvt. Ltd.	Joint Ventures	50%	Yes
105	Adani CMA Mundra Terminal Pvt. Ltd.	Joint Ventures	50%	Yes
106	Adani Total Pvt. Ltd. (ATPL)	Joint Ventures	50% of ALL	Yes
107	Dhamra LNG Terminal Pvt. Ltd.	Joint Ventures	100% of ATPL	Yes
108	Dholera Infrastructure Pvt. Ltd. (DIPL)	Subsidiary	49%	No
109	Mundra LPG Terminal Pvt. Ltd.	Subsidiary	48.97%	No
110	Dholera Port and Special Economic Zone Ltd.	Subsidiary	100% of DIPL	Yes
111	Mundra Solar Technopark Pvt. Ltd.	Subsidiary	38.95% of ALL	No
112	IndianOil Adani Ventures Ltd. (IOTL) (Formerly, IndianOil Tanking Ltd.)	Associate company	49.38%	No
113	IOT Utkarsh Ltd.	Associate company	100% (IOTL)	Yes
114	IOT Engineering Projects Ltd.	Associate company	100% (IOTL)	Yes
115	IOT Engineering & Construction Services Ltd.	Associate company	100% (IOTL)	Yes
116	IOT Infrastructures Pvt. Ltd.	Associate company	100% (IOTL)	Yes
117	IOT Biogas Pvt. Ltd.	Associate company	100% (IOTL)	Yes
118	Kazakhstan Caaspishelf India Pvt. Ltd.	Associate company	100% (IOTL)	Yes
119	IOT Utkal Energy Services Ltd.	Associate company	71.57% (IOTL)	Yes
120	Stewarts & Lloyds of India Ltd.	Associate company	55.46% (IOTL)	Yes
121	Zuari Indian Oiltanking Pvt. Ltd.	Associate company	50.00% (IOTL)	Yes
122	Kateon Natie IOT Pvt. Ltd.	Associate company	49.00% (IOTL)	No
123	IOT Vito Muhendislik Insaat ve Taahhut AS, Turkey	Associate company	70.00% (IOTL)	Yes
124	Indian Oiltanking Engineering & Construction Services LLC, Oman	Associate company	70.00% (IOTL)	Yes
125	PT IOT EPC Indonesia	Associate company	66.70% (IOTL)	Yes
126	JSC Kazakhstancapishelf	Associate company	56.70% (IOTL)	Yes



**VI. CSR Details**

	Response
22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes
(ii) Turnover (in ₹)*	₹20,852 Cr. (FY23)
(iii) Net worth (in ₹)	₹46,922 Cr.

\*Revenue from operations

**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 22-23			Current Financial Year FY 21-22		
		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, a mechanism is in place to interact with community leaders to understand and address their concerns, if any	0	0	N/A	0	0	N/A
Investors (other than shareholders)	Yes <a href="https://scores.gov.in/scores/Welcome.html">https://scores.gov.in/scores/Welcome.html</a>	9	1	The unresolved complaint was resolved on 5 <sup>th</sup> April 2023	9	0	N/A
Shareholders	Yes	0	0	N/A	9	0	N/A
Employees and workers	Yes <a href="https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Whistle-Blower-Policy.pdf">https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Whistle-Blower-Policy.pdf</a>	0	0	N/A	0	0	N/A
Customers	Yes	0	0	N/A	10	2	N/A
Value Chain Partners	Yes	0	0	N/A	0	0	N/A

Other (please specify)	Nil	Nil	N/A	Nil	Nil	Nil	N/A
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#### 24. Overview of the entity's material responsible business conduct issues

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format

Details of the top 3 high priority topics for APSEZL have been disclosed here. For further details on all the material topics, please refer the section on materiality assessment in Integrated Report 22-23 (page no. 111).

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	Human Rights	Risk	<p>We are committed to respecting human rights everywhere we operate and throughout our entire value chain.</p> <p>Any deviation from Human Rights policy can lead to imposition of fines and legal actions. Being complicit in human rights risk violations could negatively impact APSEZ's reputation and can also affect our ability to attract talent.</p>	<p>APSEZL human rights strategy for our business and suppliers is aligned with the United Nations (UN) Guiding Principles on Business and Human Rights and focuses on:</p> <ul style="list-style-type: none"> <li>▪ Embedding human rights policies into our business</li> <li>▪ Implementing due diligence processes to identify, prevent, mitigate, and account for human rights impacts due to our business operations and our supply chain.</li> <li>▪ Providing remedial actions when needed</li> <li>▪ Communicating transparently with our stakeholders about our processes and actions</li> </ul> <p>Engaging constructively with employees, suppliers, local communities, governments, non-governmental organizations, and other stakeholders.</p>	Negative

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	Risk	Our port operations are impacted by any natural phenomenon like cyclone, heavy rains, wind etc. Thus, without considering the impact that climate change will have on port infrastructure we will be placing our fundamental business asset at risk.	<p>We have set our road map to achieve Carbon Neutrality by 2025 and achieve net zero emissions afterward. Our strategies for mitigating these climate-related risks include:</p> <ul style="list-style-type: none"> <li>▪ Reduce energy intensity by 50% in 2025 from the level in 2016.</li> <li>▪ Achieve fuel-switch through electrification of equipment such as RTGs, MHCs, ITVs, and locomotives.</li> <li>▪ With a target to have 100% renewable in electricity mix by 2025, we plan to install around 250 MW renewable capacity.</li> </ul> <p>APSEZL has conducted a Climate Change Vulnerability Risk Assessment of the infrastructure related to port operations. A broad Adaptation Plan was developed to address the significant climate risks through adaptation measures for each of the 4 most vulnerable ports.</p>	Negative
3	Biodiversity and Land Use	Risk	We recognize that our operations are likely to cause adverse effects on the marine ecosystem and land utilization. Therefore, it is imperative that we take measures to mitigate the intensity and extent of these impacts. If we fail to address the risks associated with biodiversity and land use, it could harm our image, market position, and financial well-being.	<p>APSEZL is committed towards protecting biodiversity in our operations with an aim to achieve overall Net Positive Impact (NPI) on biodiversity by 2050.</p> <p>APSEZL has prepared location specific Biodiversity Management Plans for Mundra, Dhamra, Hazira and Vizhinjam, developed as per IFC Performance Standards and the Equator Principles.</p>	Negative

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"> <li>▪ By 2025, we have committed to achieve 1200 ha of terrestrial plantation and 5000 ha of mangrove afforestation.</li> <li>▪ At APSEZL, Natural Capital Action Plan (NCAP) was prepared for the Mundra and Dahej ports, based on a monitoring of three seasons of data in a year, covering terrestrial and marine flora and fauna</li> </ul> <p>We have aligned 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.</p>	

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

- P1** Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable
- P2** Businesses should provide goods and services in a manner that is sustainable and safe
- P3** Businesses should respect and promote the well-being of all employees, including those in their value chains
- P4** Businesses should respect the interests of and be responsive to all its stakeholders
- P5** Businesses should respect and promote human rights
- P6** Businesses should respect and make efforts to protect and restore the environment
- P7** Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
- P8** Businesses should promote inclusive growth and equitable development
- P9** Businesses should engage with and provide value to their consumers in a responsible manner

Sr. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes										
1	a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web Link of the Policies, if available	<a href="https://www.adaniports.com/Investors/Corporate-Governance">https://www.adaniports.com/Investors/Corporate-Governance</a>								
2	Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3	Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
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"> <li>▪ ISO 14001: 2015</li> <li>▪ ISO 28000:2017</li> <li>▪ ISO 9001:2015</li> <li>▪ ISO 45001: 2018</li> <li>▪ ISO 50001:2018</li> <li>▪ IFC Performance Standard</li> <li>▪ GRI</li> <li>▪ UNGC</li> <li>▪ CEO Water Mandate</li> <li>▪ IBBI &amp; IUCN</li> </ul>								

Sr. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.			<b>P3: Employees:</b> -Zero fatalities and Zero Incidents by 2025 -Employee Turnover: <4% Voluntary Attrition by 2025 - <b>5%</b> women in the workforce by 2025  <b>P4: Stakeholder Engagement:</b> -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  <b>P6: Energy &amp; Emission:</b> -Carbon neutrality by 2025, and net zero thereafter. -50% Energy intensity reduction by 2025 -60% Emission intensity reduction by 2025 -100% RE share in total electricity by 2025 -25% RE share in total energy by 2025  <b>P6: Water and Waste:</b> -60% Water consumption intensity reduction -Zero waste to landfill for 12 ports by 2025. -Single use plastic free sites (12 Ports + 4 ICDs + 14 Silo sites) by 2025 -Zero Unauthorized Waste Disposal (ZUWD) -Zero Effluent Discharge (ZED)  <b>P6: Afforestation</b> -5000 Ha Mangrove afforestation by 2025 -1200 Ha Terrestrial plantation by 2025  <b>P8: Community</b> -Community based skill development Program: 100000 enrollments by 2025 -265 Women's self-help groups 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><b>P3: Employees:</b>  Number of fatalities in FY22-23= 2  Number of LTI = 21  Voluntary attrition rate = 10%  % of women workforce as of FY22-23= 2.39%</p> <p><b>P4: Stakeholder Engagement:</b>  Employee Satisfaction Rate in FY22-23= 4.11/5  Supplier Satisfaction Rate in FY22-23=4.25/5  Customer Satisfaction Rate in FY22-23= 4.3/5</p> <p><b>P6: Environment  Energy &amp; Emission:</b>  RE share in total electricity  FY23 – Target :14%  FY23 – Status :14%</p> <p>Energy intensity reduction  FY23 – Target: 45%  FY23 – Status: 46%</p> <p><b>Waste and Water:</b>  Zero waste to landfill  FY23 – Target: 6 sites  FY23 – Status :6 Sites</p> <p>Water consumption intensity reduction  FY23 – Target: 58%  FY23 – Status:60%</p> <p><b>Afforestation</b>  Mangrove afforestation  FY23 – Target: 3800 Ha.  FY23 – Status: 3990 Ha.</p> <p><b>P8: Community</b>  Number of enrollments in Community based skill development Programmes as of FY22-23=265  Number of Women's self-help groups as of FY22-23=338</p>								

**GOVERNANCE, LEADERSHIP AND OVERSIGHT****7. Statement by Director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements**

Please refer to (page no. 38), Integrated Report FY 2022-23 for the statement by CEO.

**8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policies**

The Board of the Company has constituted different committees to look after different aspects of Business Responsibility, these committee oversight the policy and implementation.

i. Corporate Responsibility Committee comprising solely of the Independent Directors to oversee strategies, activities and policies including environment, social, governance, health and safety related material issue and indicators in the global context and evolving statutory framework.

Name of Member	Composition of Committee	DIN No.
Prof. G Raghuram	Chairman (Non-Executive & Independent Director)	01099026
Mr. G. K. Pillai	Member (Non-Executive & Independent Director)	02340756
Mr. P.S. Jayakumar	Member (Non-Executive & Independent Director)	01173236

ii. Nomination and Remuneration Committee comprising solely of Independent Directors to review, amend and approve all Human Resources related policies.

Name of Member	Composition of Committee	DIN No.
Mr. P.S. Jayakumar	Chairman (Non-Executive & Independent Director)	01173236
Mr. G. K. Pillai	Member (Non-Executive & Independent Director)	02340756
Mrs. Nirupama Rao	Member (Non-Executive & Independent Director)	06954879

iii. Stakeholders' Relationship Committee comprise of three members, with a majority of independent directors, it looks into various aspects of interest of shareholders, debenture holders and other security holders including complaints related to transfer/ transmission of shares, non-receipt of annual report, non-receipt of declared dividends, issue of new/duplicate certificates, general meetings etc.

Name of Member	Composition of Committee	DIN No.
Prof. G Raghuram	Chairman (Non-Executive & Independent Director)	01099026
Mr. G. K. Pillai	Member (Non-Executive & Independent Director)	02340756
Mr. Karan Adani	Member (Executive Director)	03088095

iv. Corporate Social Responsibility Committee comprise of four members, with a majority of independent directors, they formulate and recommend to the Board an annual action plan in pursuance to CSR Policy.

Name of Member	Composition of Committee	DIN No.
Mrs. Nirupama Rao	Chairperson (Non-Executive & Independent Director)	06954879
Mr. G. K. Pillai	Member (Non-Executive & Independent Director)	02340756
Prof. G Raghuram	Member (Non-Executive & Independent Director)	01099026
Dr. Malay Mahadevia	Member (Non-Executive Director)	00064110



**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.**

Yes, the Corporate Responsibility Committee comprising solely of the Independent Directors is responsible for decision making on sustainability related issues. The Charter of the Committee is available at: <https://www.adaniports.com/-/media/Project/Ports/Investor/board-and-committee-charters/APSEZL---Corporate-Responsibility-Committee-Charter.pdf?la=en&hash=CEFD8B0007B599E3CE429F3269D4CC27>

Name of Member	Composition of Committee	DIN No.
Prof. G Raghuram	Chairman (Non-Executive & Independent Director)	01099026
Mr. G. K. Pillai	Member (Non-Executive & Independent Director)	02340756
Mr. P.S. Jayakumar	Member (Non-Executive & Independent Director)	01173236

**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	The performance against the policies of the Company is reviewed on a quarterly basis by department heads / director / board committees / board members, wherever applicable.								
Compliance with statutory requirements of relevance to the principles and, rectification of any non-compliances.	Y	Y	Y	Y	Y	Y	Y	Y	Y	Status of compliance with all applicable statutory requirements is reviewed by the Board on a quarterly basis.								

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.**

All principles are covered by policies.

## SECTION C: PRINCIPLE WISE PERFORMANCE

### PRINCIPLE 1: BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY AND IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE

#### ESSENTIAL INDICATORS

#### 1. Percentage coverage by training and awareness programmes on any of the principles during the financial year –

Segments	Total number of trainings and awareness programmes held	Topics / principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	5	<ol style="list-style-type: none"> <li>1. Deep dive discussion on Ocean Sparkle Limited</li> <li>2. Deep dive discussion on NRC Limited</li> <li>3. Overview briefing on Adani portfolio &amp; ESG update</li> <li>4. Deep dive discussion on Dhamra Port and Dhamra Port site visit</li> <li>5. ESG session</li> </ol>	80%
Key managerial Personnel	1	Holistic Wellbeing Program	33%
Employees other than BoD and KMPs	11	<ol style="list-style-type: none"> <li>1. Prevention of Sexual Harassment (POSH)</li> <li>2. Adani Code of Conduct</li> <li>3. Human Rights,</li> <li>4. Digital Transformation Workshop</li> <li>5. Conflict Management</li> <li>6. Holistic Wellbeing Program</li> <li>7. Health &amp; Safety</li> <li>8. Workplace diversity equity and inclusion</li> <li>9. Introduction to ESG</li> <li>10. Environmental Social Management</li> <li>11. Risk Management</li> </ol>	96%
Workers	6	<ol style="list-style-type: none"> <li>1. Adani Code of Conduct</li> <li>2. Holistic Wellbeing Program</li> <li>3. Health &amp; Safety</li> <li>4. Workplace diversity equity and inclusion</li> <li>5. Environmental Social Management</li> <li>6. Human Rights</li> </ol>	100%

**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 (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):**

#### Monetary

	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial Institutions	Amount	Brief of the Case	Has an appeal been preferred? (Yes / No)
Penalty / Fine	Nil	Nil	0	Nil	Nil
Settlement	Nil	Nil	0	Nil	Nil
Compounding Fees	Nil	Nil	0	Nil	Nil

#### Non-Monetary

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

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

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

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

Yes. APSEZL has an Anti-Corruption and Anti-Bribery policy (ABAC) in place (Weblink: <https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/AntiBribery--AntiCorruption-Guidelines.pdf>). The ABAC Policy applies to all dealings, transactions, and expenses for and on behalf of the Company. It is applicable to all the stakeholders working for or acting on behalf of the Company or any of its subsidiaries. This Policy lays out the spirit and guiding principles for all our stakeholders to ensure compliance with the applicable laws, rules, and regulations. APSEZL is committed to conducting its business with the highest standards of business ethics and integrity. A zero-tolerance approach is followed by APSEZL towards bribery, corruption, unethical practices, and breach of professional integrity. Therefore, any violation of these guidelines may have significant consequences, including action up to termination.

While conducting various business activities, it is expected by employees, managers, and business leaders to maintain the highest standards of corporate conduct and maintain long term relationships with business partners with integrity. The Company also complies with all applicable anti-money laundering laws wherever it does business, including any applicable registration and suspicious transaction reporting obligations.

**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 2022-23	FY 2021-22
Directors	0	0
KMPS	0	0
Employees	0	0
Workers	0	0

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

	FY 2022-23		FY 2021-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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

Not Applicable

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

Total number of awareness programmes held	Topics/principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes*
2	Health & Safety, Human Rights, ESG, Policies, Code of Conduct	19

\*Includes information on suppliers' awareness programs.

**2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? If yes, provide details of the same.**

Yes, APSEZL has a Code of Conduct which is applicable to all the members of the Board of Directors and all the members of the Company. The code details the expectation regarding Conflict of Interest involving members of the Board. The Code is available at <https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Code-of-Conduct.pdf>. The members of the board and Senior management should affirm the compliance with the code on annual basis. The annual compliance report is forwarded to the Company Secretary.

As per the Code of Conduct, Directors and members of Senior Management of APSEZL should avoid conflicts of interests with the Company. Any situation that involves, or may reasonably be expected to involve, a conflict of interest with the Company shall be disclosed promptly to the Company Secretary of the Company.

**PRINCIPLE 2: BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE.****ESSENTIAL INDICATORS****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.**

	FY 2022-23	FY 2021-22	Details of improvements in environmental and social impacts
R&D*	0	0	NA
Capex	0	0	NA

\*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 equipment/machinery, electrification of rail route, water conservation, wastewater and waste management, emission reduction etc. to minimize GHG emission, reduce waste, and conserve natural resources. The company is also carrying out various initiatives 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. a. Does the entity have procedures in place for sustainable sourcing?

Yes. APSEZL believes that the development of its suppliers is imperative for our business growth. Therefore, the Company is committed towards the suppliers to inculcate APSEZL'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.

The Company has systems, policies, and procedures 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 <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).

Additionally, APSEZL has established key performance indicators (KPIs) and targets for supply chain management sustainability that apply to Tier 1 suppliers. These suppliers are deemed high dependency, as they are the direct vendors with whom the Company engages in large volume transactions. Our system records and verifies all suppliers' Environment, Social, and Governance (ESG) parameters, and we provide them with the necessary knowledge to improve their ESG metrics.

## b. If yes, what percentage of inputs were sourced sustainably?

In FY 22-23, APSEZL assessed 19% of its suppliers, out of which 85% of inputs are sourced sustainably.

## 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.

Being a service provider company, APSEZL doesn't have any products to reclaim for re-use and recycle. However, the Company complies with all applicable regulatory requirements pertaining to waste management. The Company has defined processes in place for managing waste at each of its operational sites/locations.

### Plastics

As per the statutory guidelines for obtaining Environmental Clearance (EC) from MoEF&CC, we are required to have Single Use Plastic (SUP) free ports. Accordingly, all our operating ports are SUP free. Other than SUP, plastic waste are reused and recycled appropriately.

### E-waste

All e-waste generated in-house is recycled or handed over to certified vendors for safe disposal.

### Hazardous Waste

- Hazardous waste is handled, segregated, stored, and transported in accordance with applicable regulatory requirements and best industry practices. Hazardous waste is disposed of in an environmentally sound manner through authorized vendors for recycling as required by regulation.
- Hazardous waste (chemicals, sludge, oil etc.) collected from incoming vessels are channelized through a separate line, which is handed over to authorized third-party dealers.

### Other Waste

APSEZL has initiated 'Zero Waste to Landfill' (ZWL) initiative for non-hazardous waste as we are committed towards responsible waste disposal practices, and we have implemented the 5R approach (Reduce, Reuse, Recycle, Recover, and Reprocess) across all our facilities. As part of the ZWL initiative Mundra, Kattupalli, Ennore, Dhamra, Goa, and Tuna sites have achieved Zero Waste to Landfill Assurance Statement.

Essential measures taken towards effective waste management are:

- We have implemented a sustainable waste management practice by recycling bio-degradable waste and using it as manure.
- Non-biodegradable waste such as paper, plastic, and scrap are sent to recyclers.
- Non-recyclable and non-recoverable dry waste (loose refused derived fuel) was sent to cement plants for co-processing.
- STP sludge was used as soil conditioner/manure.

- APSEZL has successfully accomplished its objective of establishing a single-use plastic-free port across nine of its sites as part of its commitment to the 5R's principle.
- Under the International Maritime Organization'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'.
- We continuously educate and train our employees on responsible waste disposal practices to ensure that they are aware of their roles in implementing sustainable waste management practices. In addition, we work with our customers to manage their waste through appropriate channels.

**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.**

No. Owing to the nature of the Company's product/service offerings, APSEZL doesn't fall under Extended Producers Responsibility (EPR) regime under Plastic Waste Management Rules, 2016, according to which it is the responsibility of Producers, Importers and Brand-owners to ensure processing of their plastic packaging waste through recycling, re-use, or end of life disposal.

**LEADERSHIP INDICATORS**

**1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?**

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
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No, the entity has not conducted LCA for its services.

**2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.**

Name of the Product/Service	Description of the Risk/Concern	Action Taken
-----------------------------	---------------------------------	--------------

Not Applicable

**3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry)**

Indicate input material	Recycled or re-used input material to total material	
	FY 2022-23	FY 2021-22
Plastic Waste	6%	1%

**4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format**

	FY 2022-23			FY 2021-22		
	Reused	Recycled	Safely Disposed	Reused	Recycled	Safely Disposed
Plastic (including packaging)	256.61	826.48	0	141.89	2.51	222.14
E-waste	0	111.31	0	44.13	6.80	0
Hazardous waste*	183.63	884.20	168.61**	2.32	774.79	137.55**
Other Waste***	2886.88	7153.27	916.02**	97.67	6239.81	1694.42**

\*Included Hazardous waste + E-waste + Biomedical Waste

\*\*Incinerated and landfill

\*\*\*Non-Hazardous Waste

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
Not Applicable	

**PRINCIPLE 3: BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS.**  
**ESSENTIAL INDICATORS**

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

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	2439	2439	100	2439	100	0	0	2439	100	0	0
Female	64	64	100	64	100	64	100	0	0	0	0
<b>Total</b>	<b>2503</b>	<b>2503</b>	<b>100</b>	<b>2503</b>	<b>100</b>	<b>64</b>	<b>3</b>	<b>2439</b>	<b>97</b>	<b>0</b>	<b>0</b>
Other than Permanent employees											
Male	86	86	100	86	100	0	0	86	100	0	0
Female	5	5	100	5	100	5	100	0	0	0	0
<b>Total</b>	<b>91</b>	<b>91</b>	<b>100</b>	<b>91</b>	<b>100</b>	<b>5</b>	<b>5</b>	<b>86</b>	<b>95</b>	<b>0</b>	<b>0</b>

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

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 workers											
Male	453	453	100	453	100	0	0	453	100	0	0
Female	3	3	100	3	100	3	100	0	0	0	0
<b>Total</b>	<b>456</b>	<b>456</b>	<b>100</b>	<b>456</b>	<b>100</b>	<b>3</b>	<b>1</b>	<b>453</b>	<b>99</b>	<b>0</b>	<b>0</b>
Other than Permanent employees											
Male	1	1	100	1	100	0	0	1	100	0	0
Female	1	1	100	1	100	1	100	0	0	0	0
<b>Total</b>	<b>2</b>	<b>2</b>	<b>100</b>	<b>2</b>	<b>100</b>	<b>1</b>	<b>50</b>	<b>1</b>	<b>50</b>	<b>0</b>	<b>0</b>

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

Benefits	FY 2022-23			FY 2021-22		
	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	-	-	NA	-	-	NA

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

Yes, APSEZL is committed to delivering value through equality and to nurture and promote human diversity across its operations. At our corporate office, we have made special provisions for differently abled employees and workers in accordance with the Rights of Persons with Disabilities Act, 2016. We strongly promote equal opportunities for everyone, and we acknowledge the importance of having a diverse and equitable work environment. We have designed workplaces to enable employees with disabilities to carry 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 a comprehensive plan to address the accessibility of workplaces for differently abled employees.

Our policy on Employment of differently abled People and Diversity, and Inclusion has been developed in line with our commitment. It can be accessed at: <https://origin-webapp.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Employment-of-Differently-abled-People---Guidelines---APSEZL.pdf>

**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. APSEZL is an equal opportunity employer and extends the right of equal opportunity for differently abled candidates. 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:

[Guidelines for Employment of Differently abled people:](https://origin-webapp.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Employment-of-Differently-abled-People---Guidelines---APSEZL.pdf)

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

[Diversity and Inclusion Guidelines:](https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Diversity-and-Inclusion-Guidelines.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	100	100	100	100
Female	0	0	0	0
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

\*No female employees/workers took parental leaves.

**6. Is there a mechanism available to receive and redress grievances for the following categories of employees and workers? If yes, give details of the mechanism in brief.**

Indicate product category	Yes/No (If yes, then give details of the mechanism in brief)
Permanent Workers	Yes
Other than Permanent Workers	Yes
Permanent Employees	Yes
Other than Permanent Employees	Yes

Yes, we have implemented an online Grievance Redressal system called "Speak-Up," which is exclusively for its workforce (permanent employees, permanent workers and other than permanent) to raise any concerns they may have. The system allows them to bring their concerns to the attention of the Grievance Redressal Committee (GRC), which resolves these issues within 14 working days. The grievances are resolved in a fair and time bound manner maintaining utmost confidentiality. In addition, grievance registers and complaint boxes are available



at sites/locations wherein grievances/complaints can be registered/ submitted. Workers that are engaged on a contractual basis can also 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.

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.

The Company has also adopted a Whistle Blower Policy and has established the necessary vigil mechanism for employees to report concerns about unethical behavior and financial irregularities. 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.

#### 7. Membership of employees and worker in association(s) or Unions recognised 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 are there in FY 2022-23 (No trade union).

Category	FY 2022-23			FY 2021-22		
	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 (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
<b>Total Permanent Employees</b>	2503	0	0	2150	0	0
Male	2439	0	0	2116	0	0
Female	64	0	0	34	0	0
<b>Total Permanent Workers</b>	456	0	0	510	0	0
Male	453	0	0	506	0	0
Female	3	0	0	4	0	0

#### 8. Details of training given to employees and workers:

Category	FY 2022-23					FY 2021-22				
	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	2525	1694	67	1432	57	2188	1495	68.3	2180	99.6
Female	69	14	20	12	17	37	28	75.7	37	100
<b>Total</b>	<b>2594</b>	<b>1708</b>	<b>66</b>	<b>1444</b>	<b>56</b>	<b>2225</b>	<b>1523</b>	<b>68.4</b>	<b>2217</b>	<b>99.6</b>
Workers										
Male	454	454	100	454	100	507	318	62.7	177	34.9
Female	4	4	100	4	100	4	2	50	1	25
<b>Total</b>	<b>458</b>	<b>458</b>	<b>100</b>	<b>458</b>	<b>100</b>	<b>511</b>	<b>320</b>	<b>62.6</b>	<b>178</b>	<b>34.8</b>

## 9. Details of performance & career development reviews of employees & workers

Category	FY 2022-23			FY 2021-22		
	Total (A)	Number (B)	% (B/A)	Total (C)	Number (D)	% (D / C)
<b>Employees</b>						
Male	2525	2428	96*	2188	2083	95*
Female	69	69	100	37	30	81*
<b>Total</b>	<b>2594</b>	<b>2497</b>	<b>96*</b>	<b>2225</b>	<b>2113</b>	<b>95*</b>
<b>Workers</b>						
Male	454	454	100	507	505	99.6*
Female	4	4	100	4	4	100
<b>Total</b>	<b>458</b>	<b>458</b>	<b>100</b>	<b>511</b>	<b>509</b>	<b>100</b>

\*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? If yes, the coverage such system?

Yes, 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. 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.

### 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:** APSEZL 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 Preactup 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 workforce. The Company recognizes that the dynamic risks need to be managed and mitigated as per Hierarchy of Control to protect its stakeholders and achieve the 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 health risks 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 is implemented as per control measures hierarchy i.e., elimination, substitution, engineering, administration & Personal Protective Equipment (PPE). Also refer to the 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 APSEZL. 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. This includes medical check-ups, clinics, etc. at sites to promote healthy and fit employees. The Company ensures the presence of fully equipped emergency healthcare facilities at all its sites, prioritizing the well-being of employees and contractors. To monitor the health of individuals, comprehensive pre-employment and periodic medical assessments are conducted for all personnel.

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

Safety Incident/Number	Category	FY 2022-23	FY 2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.09	0
	Workers	0.28	0.26
Total recordable work-related injuries	Employees	7	0 (LTI)
	Workers	14	45*
No. of fatalities	Employees	0	0
	Workers	2	3
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

\*(LTI-16, Fatal-3, MTC-26)

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

The 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 the 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. The safety intervention taken in FY 22-23, are described in page no. 221 of IR FY 22-23.

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

Category	FY 2022-23			FY 2021-22		
	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	0	0	Nil	Nil	Nil	-
Health & Safety	0	0	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%
Working Conditions	100% of our sites are assessed on Working Conditions as part of our internal compliance program which is linked to the policies.

This year as per the Group Safety guidelines, APSEZL have conducted Prestart up Safety Review (PSSR) audits across all the Applicable process safety areas. All our sites are assessed on Health & Safety parameters as part of ISO 45001 audit. The sites undergo audits and certification by third-party agencies. The Company employs the PDCA (Plan, Do, Check, Act) cycle for periodic assessment and enhancement purposes. Additionally, safety audits in accordance with the Factories Act are conducted at regular intervals.

**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 APSEZL Safety Guidelines on Incident Reporting & Investigation and learning is shared across sites to ensure non-occurrence of similar incidents. Also, employees and workers are encouraged to report maximum number of unsafe acts and conditions to eliminate such incidents. Please refer to IR page no. 220 for safety incidents and corrective actions taken.

**LEADERSHIP INDICATORS**

**1. Does the entity extend any life insurance or any compensatory package in the event of death of**

**(A) Employees:** Yes, for Employees to safeguard and support them from uncertainties and during unfortunate times or distress, we have introduced 'Group Term Life Insurance' policy.

**(B) Workers:** Yes

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

The Company monitors remittance of statutory dues by value chain partners as part of processing their bills on a regular basis with periodic audits.

**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 rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:**

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable Employment	
	FY 22-23	FY 21-22	FY 22-23	FY 21-22
Employees	0	0	N/A	N/A
Workers	2	3	N/A	N/A

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

**5. Details on assessment of value chain partners:**

	<b>% of value chain partners (by value of business done with such partners) that were assessed*</b>
Health and safety practices	19%
Working Conditions	0

\*Includes information on suppliers' assessment

**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.**

The awareness training has been given to Suppliers on Health and Safety practices.

**PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS.****ESSENTIAL INDICATORS****1. Describe the processes for identifying key stakeholder groups of the entity.**

We have identified our relevant stakeholder groups based on factors impacting our business. Our stakeholder identification and prioritization process are based on inclusivity, materiality, and responsiveness. APSEZL identifies its stakeholders as groups and individuals, who can influence or/ are impacted by our operations/ activities, change in technology, regulations, market, and societal trends either directly or indirectly which comprise of communities, employees, supply chain partners, customers, investors, regulators, and civil society organizations for all its operational ports. We also give utmost priority to identifying Indigenous/ vulnerable people surrounding our project sites and respecting their rights to economic, social, and cultural wellbeing and development. That said, identification of stakeholders is an on-going process is in line with our Stakeholder-Engagement-Policy.pdf (adaniports.com) <https://origin-webapp.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Stakeholder-Engagement-Policy.pdf>

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 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.**

<b>Stakeholder Group</b>	<b>Whether identified as Vulnerable and Marginalized Group (Yes/ No)</b>	<b>Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others</b>	<b>Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)</b>	<b>Purpose and scope of engagement including key topics and concerns raised during such engagement</b>
Shareholders	No	Annual General Meeting, shareholder meets, email, Stock Exchange (SE) intimations, investor / analysts meet / conference calls, annual report, quarterly results, media releases, Company / SE website	Quarterly, as, and when required	<ol style="list-style-type: none"> <li>Share price appreciation, dividends, profitability, and financial stability</li> <li>Robust ESG practices, climate change risks, cyber risks</li> <li>Growth prospects</li> </ol>

Stakeholder Group	Whether identified as Vulnerable and Marginalized Group (Yes/ No)	Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	Website, distributor / retailer / direct customer / achievers meet, senior leader customer meets / visits, helpdesk, conferences, joint BD plans, emails, customer surveys, reports, brochures, feedback mechanism, customer support cells	Quarterly, annually, as, and when required	<ol style="list-style-type: none"> <li>1. In surveys, customers (shipping lines) are asked to disclose their environment and health &amp; safety management systems &amp; certifications and targets on carbon reduction, waste management and water efficiency, human rights practices.</li> <li>2. Service Quality</li> <li>3. Responsiveness to needs</li> </ol>
Employees	No	Online survey, magazines, e-mails, intranet, reports, website, online grievance mechanism, one-to-one interactions, Town Hall meetings, brochures, HR communication, wellness initiatives and workshops	Continuous, weekly, monthly, quarterly, and annually	<ol style="list-style-type: none"> <li>1. Career/ performance discussion</li> <li>2. Training &amp; Awareness</li> <li>3. Identify and report human rights issues, and the awareness of various means to report any abuse</li> <li>4. Operational efficiency</li> <li>5. Health, safety, and engagement initiatives</li> </ol>
Suppliers	No	Prequalification / vetting, communication and partnership meets, plant visits, MoU and framework agreements, online survey, e-mails, ESG Assessment, vendor meet, online grievance mechanism, site visits, one-to-one interaction, reports, website and workshops	Monthly, quarterly, annually, as, and when required	<ol style="list-style-type: none"> <li>1. Quality &amp; sustainable supply</li> <li>2. Timely delivery and payments</li> <li>3. ESG consideration (sustainability, safety checks, compliances, human rights), ISO and OHSAS standards,</li> <li>4. Collaboration and digitalization opportunities</li> </ol>
Community	Yes	Community visits and projects, partnership with local charities, volunteerism, seminars / conferences, assessments & surveys, focused group discussions, one-to-one interactions, media, website, online grievance mechanism and field visits	Monthly, quarterly, annually, as, and when required	<ol style="list-style-type: none"> <li>1. Identify and prioritize the interventions required by the communities.</li> <li>2. Impact assessments of various community development projects are performed by third parties for CSR interventions undertaken.</li> <li>3. Assessments for human rights</li> <li>4. CSR activities</li> <li>5. Awareness programmes</li> </ol>



Stakeholder Group	Whether identified as Vulnerable and Marginalized Group (Yes/No)	Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Regulatory authorities & rating agencies	No	Reports, website, online applications, presentation, one-to-one interaction, events, e-mails, letters, and meetings	Annually as, and when required	<ol style="list-style-type: none"> <li>1. Regulatory &amp; compliance requirements</li> <li>2. Support &amp; Feedback on business performance</li> <li>3. Sustainability topics of concern</li> </ol>

## 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.

We recognize that consultation with the stakeholders is a continuous process and is led by Leadership from the front through regular engagements at various platforms. We have a systematic stakeholder engagement process in place. We seek interactions to respond to trends, global environment, and market requirements. This approach enables us to proactively evaluate situations. We believe that stakeholders possess the ability to influence APSEZL's decisions and in turn, be influenced by the actions of the company.

To guide our approach to stakeholder engagement, we have established Stakeholder Engagement Policy (Stakeholder engagement policy) <https://origin-webapp.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Stakeholder-Engagement-Policy.pdf>. 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. There is continuous dialogue with the community stakeholders which is 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. Public consultations are part of the new project and expansion plans, where feedback and views of the stakeholders is considered for project design.

Board-level committee: Corporate Responsibility Committee and Stakeholder Relationship Committee is responsible for consultation between stakeholders and the Board on 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. If so, provide details of instances as to how the input received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes. Business partners are encouraged to share input 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. has been taken up as per the materiality assessment. We engage with selected stakeholders, identified on the principles of responsibility, influence, impact and dependency. Customized questionnaires for various stakeholder categories are developed to identify areas of concern or ongoing focus desired by stakeholders. This is to facilitate consultative processes to ensure full coverage of environmental, social and governance issues as well as the involvement of the personnel and management of APSEZL 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 in 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 for farmers, women, students, unemployed youth, etc. Please refer to the CSR section of our Annual Integrated Report FY 2022-2023 (page no. 245) for more details.

**PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS**

**ESSENTIAL INDICATORS**

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. employees or workers covered (B)	% (B / A)	Total (C)	No. employees of workers covered (D)	% (D/C)
Employees						
Permanent	2503	1811	72	2150	2150	100
Other than permanent	91	0	0	75	75	100
<b>Total Employees</b>	<b>2594</b>	<b>1811</b>	<b>70</b>	<b>2225</b>	<b>2225</b>	<b>100</b>
Workers						
Permanent	456	6	1	510	510	100
Other than permanent	2	0	0	1	1	100
<b>Total Workers</b>	<b>458</b>	<b>6</b>	<b>1</b>	<b>511</b>	<b>511</b>	<b>100</b>

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

Category	FY 2022-23					FY 2021-22				
	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	2503	0	0	2503	100	2150	0	0	2150	100
Male	2439	0	0	2439	100	2116	0	0	2116	100
Female	64	0	0	64	100	34	0	0	34	100
Other than Permanent	91	0	0	91	100	75	0	0	75	100
Male	86	0	0	86	100	72	0	0	72	100
Female	5	0	0	5	100	3	0	0	3	100
Workers										
Permanent	456	0	0	456	100	510	0	0	510	100
Male	453	0	0	453	100	506	0	0	506	100
Female	3	0	0	3	100	4	0	0	4	100
Other than Permanent	2	0	0	2	100	1	0	0	1	100
Male	1	0	0	1	100	1	0	0	1	100
Female	1	0	0	1	100	0	0	0	0	0



**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)	9	151.5	1	70.50
Key Managerial Personnel	3	540	0	0
Employees other than BoD and KMP	2522	11.33	69	7.21
Workers	454	6.57	4	3.14

\*(in Lakhs)

**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. 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 Whistle-blower 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 2022-23			FY 2021-22		
	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	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour / Involuntary Labour	0	0	NA	0	0	NA
Wages	0	0	NA	0	0	NA
Other human rights related issues	0	0	NA	0	0	NA

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

APSEZL has zero tolerance towards discrimination, bullying, harassment and inappropriate or abusive conduct by its stakeholder groups. We have the following measures 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 the Board of Directors, which are briefed on a quarterly basis by the ESG Head.
- To make our stakeholders 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, all the suppliers and vendors are required to adhere to APSEZ's Supplier Code of Conduct and Human Rights guidelines 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) and United Nations' Universal Declaration of Human Rights and prevalent industry standards for our vendors and suppliers. APSEZL has zero tolerance towards violation of human rights and keeps 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 organized 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 APSEZL for their suppliers and business partners.

Human right due diligence is carried out for mergers and before acquisitions which includes due diligence of country reputation in term of respecting human rights, ongoing controversy pertaining to human rights violation including child labour/forced labour/bonded labour, diversity, human trafficking, wages, sexual exploitation, racial /gender discrimination etc.

**9. Assessments for the year:**

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

\*Internal assessment through SAQ (Self-Assessment Questionnaires)

**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 identified four salient human right issues human right issues as priorities to be addressed across our value chains against which we have taken preventive actions, listed below:

**Fair Wages**

- Before Suppliers onboarding process we make sure they comply with all applicable laws and regulations with respect to minimum wages.
- APSEZL remuneration are in accordance with Government of India, Minimum Wages Act, 1948 and Wage Act 2019. We monitor our entire compensation structure to ensure that all employees are paid appropriately.

**Health & Safety**

- Access to quality healthcare is a fundamental right of every individual. Adani Foundation relentlessly works to provide access to quality health facilities at doorstep of community households and to a create healthy society.
- The company has robust systems and processes for occupational health and safety.
- We conduct the internal audit to check the working environment of the operating sites.
- We provide health & safety training to the workforce related to their functional areas.

### Forced Labour

- Our assessment is designed to ensure that potential issues of forced labour are captured and brought to our attention. Our suppliers are expected to embed following system:
- A responsible Recruitment procedure
- Due diligence and screening process
  - Clear contract with agencies
  - Training for management and workers
  - Grievance Mechanism

### Discrimination & harassment

- Communities are given awareness programs and make aware of government schemes so that they don't fall in debt cycle and do forced labour.
- Provided training to all the employees for awareness on diversity of workforce and work-related harassment, and discrimination.
- We have the Grievance Mechanism System that provides a transparent mode to obtain resolution on any human rights grievances.
- Suppliers are audited for their policy commitment and systems and processes for prevention of harassment and discrimination.

## LEADERSHIP INDICATORS

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

APSEZL 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 national laws, ILO and UNGP guidelines. The Company's commitment to human rights is reflected in its governance, procurement, and social strategy. APSEZL 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:

1. Adani Group policy on Human Rights
2. Human Rights Guidelines
3. Supplier Code of Conduct
4. Corporate Social Responsibility Policy
5. Stakeholder Engagement Policy
6. Guidelines for employment of Differently abled people
7. Business Responsibility Policy
8. Group Guidelines on Prevention of Sexual Harassment of Women at Workplace
9. Adani Group Code of Conduct Policy

In addition to the above policy implementation, this year we have amended our Human Rights Guidelines, Diversity, Equity & Inclusive Policy, and Supplier Code of conduct. We have conducted a human rights survey covering all our stakeholders. This year, we have asked the 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. The 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 and customer sustainability and ESG assessment has Human Right component integrated.

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

APSEZL follows a robust human rights due diligence process that aligns with the UNGP reporting framework. The process begins with the identification and assessment of potential impacts on the human rights of workers, suppliers, consumers, and communities. The scope includes evaluating risks in our operations, value chains, and new partnerships such as mergers, acquisitions, and joint ventures.

Human right due diligence is carried out for mergers and before acquisitions which includes due diligence of country reputation in term of respecting human rights, ongoing controversy pertaining to human rights violation including child labour/forced labour/bonded labour, diversity, human trafficking, wages, sexual exploitation, racial /gender discrimination etc.

**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, we strongly promote equal opportunities for everyone, and we acknowledge the importance of having a diverse and equitable work environment. We have designed workplaces to enable employees with disabilities to carry 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.

**4. Details on assessment of value chain partners:**

	<b>% of Value chain partners (by value of business done with such partners) that were assessed*</b>
Sexual Harassment	19
Discrimination at workplace	19
Child Labour	19
Forced Labour/ Involuntary Labour	19
Wages	0
Others- please specify	NA

\* Includes information on suppliers' assessment

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

- Our assessment is designed to ensure that potential issues of forced labor are captured and brought to our attention. Our suppliers are expected to embed following system:
  - A responsible recruitment procedure
  - Due diligence and screening process
  - Clear contract with agencies
  - Training for management and workers
  - Grievance mechanism
- Provided training to all the employees for awareness of diversity of workforce and work-related harassment, and discrimination.
- Suppliers are audited for their policy commitment and systems and processes for prevention of harassment and discrimination.
- Before suppliers onboarding process we make sure they comply with all applicable laws and regulations with respect to minimum wages.

**PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT****ESSENTIAL INDICATORS****1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**

Parameter	FY 2022-23	FY 2021-22
Total Electricity Consumption (A) (GJ)	13,87,640	10,86,392
Total fuel consumption (B) (GJ)	16,25,768	17,12,444
Energy consumption through other sources (C) (GJ)	0	0
<b>Total energy consumption (A+B+C) (GJ)</b>	<b>30,13,408</b>	<b>27,98,837</b>
Energy intensity per rupee of turnover (Total energy consumption/turnover in rupees) (GJ/Cr)	134	155
Energy intensity (optional) – the relevant metric may be selected by the entity	N/A	N/A

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 2022-23	FY 2021-22
Water withdrawal by source (in kiloliters)		
(i) Surface water	8,39,237	3,47,547
(ii) Groundwater	3,66,769	2,21,382
(iii) Third party water	28,32,089	21,74,306
(iv) Seawater / desalinated water	12,41,295	10,27,249
(v) Others	9,60,739	17,31,042
<b>Total volume of water withdrawal (In kiloliters) (i + ii + iii + iv + v)</b>	<b>62,40,130</b>	<b>55,01,526</b>
<b>Total volume of water consumption (in kiloliters)</b>	<b>55,90,749</b>	<b>47,31,107</b>
<b>Water intensity per rupee of turnover</b> (Water consumed / turnover) (ML/Cr)	0.25	0.26
<b>Water intensity (optional)</b> – the relevant metric may be selected by the entity	N/A	N/A

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.**

Yes. We ensure compliance with all applicable statutory obligations laid by the Central and State Pollution Control Board. For locations where zero liquid discharge is mandated by the Pollution Control Board, we have implemented and maintained adequate systems to ensure compliance. In other sites, we have mechanisms 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 2022-23	FY 2021-22
NOx	µg/m <sup>3</sup>	14.09	20.55
SOx	µg/m <sup>3</sup>	12.46	11.43
Particulate matter (PM)	µg/m <sup>3</sup>	41.36	56.99
Persistent organic pollutants (POP)		-	-
Volatile organic compounds (VOC)		-	-
Hazardous air pollutants (HAP)		-	-
Others – please specify		-	-

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 to MoEF&CC as part of half yearly compliance reports. Six monthly monitoring reports are also kept on the 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 2022-23	FY 2021-22
Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	1,21,102	1,29,438
Total Scope 2 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	2,61,951	1,93,063
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO <sub>2</sub> equivalent / Crore	17.10	17.8
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity.		N/A	N/A

**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.**

Yes. APSEZL has taken various GHG emission reduction initiatives in line with our target to become a Carbon neutral port, SBTi commitment, and to meet India's Climate change (NDC commitments). APSEZL has saved 42,283 tCO<sub>2</sub>e emissions through renewable energy projects and power purchase agreements during FY22-23. Some of the major GHG emissions reduction projects are undertaken in FY2023 are:

- Conversion of the conventional lights to LED lights
- 9 Electric cars introduced across the sites.
- Automation of the process to reduce the energy consumption hence the emissions.

Further details on these initiatives can be seen under environment stewardship section of our Integrated Annual Report FY22-23 (page no. 142).

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

Parameter	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	894.26	176.19
E-waste (B)	111.31	50.93
Bio-medical waste (C)	9.87	6.9
Construction and demolition waste (D)	0	0
Battery waste (E)	13.46	35.1
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	1,323.81	1,052
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	13,792.26	11,674.33
<b>Total (A+B + C + D + E + F + G+ H)</b>	<b>15,315.53</b>	<b>12995.45</b>
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	8038	7,036
(ii) Re-used	3076	99
(iii) Other recovery operations	1132	4,043
<b>Total</b>	<b>12,245</b>	<b>11,178</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	140	123
(ii) Landfilling	944	1694.42
(iii) Other disposal operations	0	0
<b>Total</b>	<b>1084</b>	<b>1817.418</b>

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.**

APSEZL, being in the service industry (i.e., provides services for cargo handling & logistic, operations & maintenance of port sector) does not produce any products using hazardous and toxic chemicals. As such, we don't have potential to recycle generated waste in our operations. However, APSEZL complies with all the applicable regulatory requirements pertaining to waste management. Achieving Zero Waste to Landfill at all our sites by FY 2025 is an ambitious sustainability goal that aims to divert all waste from landfills and eliminate the need for traditional waste disposal practices.

We dispose of our waste in an environmentally friendly manner through CPCB / SPCB registered CHWIF/ TSDF or authorized recyclers. As we move towards our vision of Zero Waste to landfill at all sites, several initiatives have been implemented in the handling and management of hazardous and non-hazardous waste at all operating port locations by focusing on 5R principles of waste management i.e., Reduce, Reuse, Reprocess, Recycle and Recover. Essential measures we take towards effective waste management:

- We have implemented a sustainable waste management practice by recycling bio-degradable waste and using it as manure.
- Non-biodegradable waste such as paper, plastic, and scrap are sent to recyclers.
- Non-recyclable and non-recoverable dry waste (loose refused derived fuel) was sent to cement plants for co-processing.
- STP sludge was used as soil conditioner/manure.



- APSEZL has successfully accomplished its objective of establishing a single-use plastic-free port across its sites as part of its commitment to the 5R's principle.
- We continuously educate and train our employees on responsible waste disposal practices to ensure that they are aware of their roles in implementing sustainable waste management practices.

**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:**

S. 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.

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 Kattupalli by Marine Infrastructure Developer Private Limited (MIDPL)	S.O. 1533 (E), EIA Notification -2006 and its amendment thereafter	14.09.2006	Yes, Status of project -Ongoing	Ongoing	
Revised Master Plan of Water Front Development Project at Mundra by Adani Ports and SEZ Limited (APSEZ)	S.O. 1533 (E), EIA Notification -2006 and its amendment thereafter	14.09.2006	Yes, Status of project -Ongoing	Ongoing	
Outer Harbour development of Hazira Port	S.O. 1533 (E), EIA Notification -2006 and its amendment thereafter	14.09.2006	Yes, Status of project -Completed	Yes	
Development of 1576.81 Ha industrial park /SEZ at Mundra by Adani Ports and SEZ Limited (APSEZ)	S.O. 1533 (E), EIA Notification -2006 and its amendment thereafter	14.09.2006	Yes, Status of project -Ongoing	Ongoing	
Proposed Utility Corridor (Road, Rail, pipeline, HT line and other utility) and LPG pipeline at Mundra by Adani Ports and SEZ Limited (APSEZ)	CRZ Notification, 2011	06.01.2011	Yes, Status of project -Completed	Yes	



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 by MPSEZ Utilities Limited (MUL)	CRZ Notification, 2011	06.01.2011	Yes, Status of project -Completed	Yes	
Additional capital & maintenance dredging and disposal of dredge material at Tuna by Adani Kandla Bulk Terminal Pvt. Ltd. (AKBTPL)	S.O. 1533 (E), EIA Notification -2006 and its amendment thereafter	14.09.2006	Yes, Status of project -Ongoing	Ongoing	
Creation of berthing and allied facilities off Tekra, near Tuna by Adani Kandla Bulk Terminal Pvt. Ltd. (AKBTPL)	CRZ Notification, 2011	06.01.2011	Yes, Status of project -Ongoing	Ongoing	
Development of 253 MLD Desalination Plant out of approved 300 MLD Desalination Plant at Mundra by Adani Ports and SEZ Limited (APSEZ)	CRZ Notification, 2011	06.01.2011	Yes, Status of project -Ongoing	Ongoing	
Development of SVCT Township at Mundra by Adani Ports and SEZ Limited (APSEZ)	S.O. 1533 (E), EIA Notification -2006 and its amendment thereafter	14.09.2006	Yes, Status of project -Ongoing	Ongoing	
EC & CRZ Clearance for the balance work development of Dighi Port by Dighi Port Limited (DPL)	S.O. 1533 (E), EIA Notification -2006 and its amendment thereafter	14.09.2006	Yes, Status of project -Ongoing	Ongoing	
EC & CRZ Clearance for Master Plan development of Dighi Port by Dighi Port Limited (DPL)	S.O. 1533 (E), EIA Notification -2006 and its amendment thereafter	14.09.2006	Yes, Status of project -Ongoing	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
Change in Product Mix of Kattupalli port by Marine Infrastructure Developer Private Limited (MIDPL)	S.O. 1533 (E), EIA Notification –2006 and its amendment thereafter	14.09.2006	Yes, Status of project -Completed	Yes	
Warehouse/Logistic Park at Indore by Adani Logistics Limited (ALL)	S.O. 1533 (E), EIA Notification –2006 and its amendment thereafter	14.09.2006	Yes, Status of project -Completed	Yes	

**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.

S. 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
Nil				

## 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 2022-23	FY 2021-22
<b>From renewable sources</b>		
Total electricity consumption(A) (GJ)	1,93,940	2,15,454
Total fuel consumption (B) (GJ)	0	0
Energy consumption through other sources (C) (GJ)	Nil	Nil
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>1,93,940</b>	<b>2,15,454</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D) (GJ)	11,93,700	8,70,939
Total fuel consumption (E) (GJ)	16,25,768	17,12,444
Energy consumption through other sources (F) (GJ)	Nil	Nil
<b>Total energy consumed from non-renewable sources (D+E+F) (GJ)</b>	<b>28,19,468</b>	<b>25,83,383</b>

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 2022-23	FY 2021-22
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(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	10,23,633* (Physico-chemical, Biological, Filtration)	742047* (Physico-chemical, Biological, Filtration)
<b>Total water discharged (in kiloliters)</b>	<b>10,23,633</b>	

\*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. Water withdrawal, consumption, and discharge in areas of water stress (in kiloliters):**

For each facility / plant located in areas of water stress, provide the following information:

1. Name of the area: Dhamra, Tuna, Dahej, Hazira in Gujarat, Krishnapatanam in Andhra Pradesh, Kattupalli & Ennore in Tamilnadu and Dighi in Maharashtra.
2. Nature of operations: Ports cargo handling
3. Water withdrawal, consumption, and discharge in the following format:

Parameter	FY 2022-23	FY 2021-22
<b>Water withdrawal by source (in kiloliters)</b>		
(i) Surface water	1,38,220	0
(ii) Groundwater	16,108	0
(iii) Third party water	24,28,203	19,15,789
(iv) Seawater / desalinated water	13,67,876	10,16,873
(v) Others	9,58,485	10,40,056
Total volume of water withdrawal (in kilolitres)	49,08,892	39,72,718
Total volume of water consumption (in kilolitres)	43,14,481	32,50,536
Water intensity per rupee of turnover (Water consumed / turnover)	.25	.26
Water intensity (optional) – the relevant metric may be selected by the Entity		

Parameter	FY 2022-23	FY 2021-22
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(i) Into Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) Into Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) Into Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties	0	0

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	20,23,072	4,71,649
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO2 equivalent	90	26
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity		N/A	N/A

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.

**5. 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.

**6. 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:**

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
	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 FY23 (page no. 142)		

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

All our ports have on-site and 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/1-EC-Compliance-ReportApr22-to-Sep22MPT-APSEZ-Mundra.pdf>

**8. 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.**

We make sure to take all the necessary measures to reduce any adverse environmental impacts arising from our value chain. For instance, none of the vessels entering the port limit are allowed to discharge any waste, bilge, ballast into the water. The company has provided waste reception facilities for incoming vessels to avoid marine water pollution. Also, PUC certification has been mandated for incoming vehicles to minimize emissions. We are also working towards electrification of Corporate Overview Statutory Reports Financial Section 397 railway lines to minimize emissions. Under the International Maritime Organization'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.

**9. 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 FY22-23 (page no. 180)

**PRINCIPLE 7: BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT.****ESSENTIAL INDICATORS****1. a. Number of affiliations with trade and industry chambers/ associations: 13****b. 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.**

S. 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 associations (FOKIA)	State
9	Hazira Area Industries Association (HAIA)	State
10	Gujarat Chamber of Commerce and Industry (GCCCI)	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 the authority	Brief of the case	Corrective action taken
Nil	Nil	Nil

**LEADERSHIP INDICATORS****1. Details of public policy positions advocated by the entity:**

Sl. No	Public Policy Advocated	Method resorted for such advocacy	Whether information available in public domain (Yes/No)	Frequency review by Board (Annually/ Half Yearly/Quarterly/ Others please specify)	Web Link, if available
1	Harit Sagar, The green port guidelines 2023	Internal communication	No	Quarterly	N/A
2	GHG Emission control under ministry of port, shipping & water ways	Discussion at marine environment protection committee (MEPC)	No	Quarterly	N/A

**PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT.****ESSENTIAL INDICATORS****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 Notification	Whether conducted by independent external agency (yes/No)	Results communicated in public domain (Yes/No)	Relevant Web
Nil					

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

Sl. No.	Name of the Project for with R&R is on going	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to the PAFs in the FY (INR)
Nil						

**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 rolling 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 2022-23	FY 2021-22
Directly sourced from MSMEs/ small producers	N/A	N/A
Sourced directly from within the district and neighboring districts	56%	26%

## LEADERSHIP INDICATORS

### 1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
Not applicable	Not applicable

### 2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

Sl. No.	State	Aspirational District	Amount Spent (INR)
1	Andhra Pradesh	Visakhapatnam	758.9 Lakhs

### 3. a. Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups?

Yes, APSEZL has a Sustainable Procurement Policy and Supplier Code of Conduct in place, which covers the aspect related to procurement/purchase from marginalized/vulnerable groups. APSEZL 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. Utilizing 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.

For further details refer to the Supply Chain section of our Integrated Annual Report FY22-23 (page no. 176).

### 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?

During FY2022-23, 56% of the Company's procurement was derived from local State vendors and 22% from the same district.

### 4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

Sl. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit Shared (Yes/No)	Basis of Calculating benefit share
N/A				

### 5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Name of authority	Brief of the Case	Corrective action taken
N/A		

### 6. Details of beneficiaries of CSR Projects:

Sl. 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 FY22-23 (page no. 244).

**PRINCIPLE 9: BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER.**

**ESSENTIAL INDICATORS**

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

The company has formal mechanisms in place to collect feedback from the customers. The 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. To report any grievance, we can be reached at Grievance.apsez@adani.com.

Besides, APSEZL proactively engages with our customers regularly. We also carry out customer satisfaction surveys through deployment of internal resources on an annual basis and covers feedback of customers across all port and logistics locations. Based on the feedback, necessary process improvements are undertaken as a part of standard management systems.

**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:**

	FY 2022-23			FY 2021-22		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	Nil	N/A	Nil	Nil	N/A
Advertising	Nil	Nil	N/A	Nil	Nil	N/A
Cyber-security	Nil	Nil	N/A	Nil	Nil	N/A
Delivery of essential services	Nil	Nil	N/A	Nil	Nil	N/A
Restrictive Trade Practices	Nil	Nil	N/A	Nil	Nil	N/A
Unfair Trade Practices	Nil	Nil	N/A	Nil	Nil	N/A
Other	Nil	Nil	N/A	Nil	Nil	N/A

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

	Number	Reasons of recall
Voluntary recalls	N/A	
Forced recalls		

**5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? If available, provide a web-link of the policy.**

Yes, APSEZL has a Cyber Security Policy: <https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Adani-Cyber-Security-Policy.pdf> in place that covers all aspects of cyber risk for IT and business areas. We are committed to establishing and improving cyber security posture and minimizing our exposure to such risks. Please refer to integrated report on page no. 222.



**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.**

So far, APSEZL has not faced any substantiated incidents concerning breaches of cybersecurity/ data privacy, etc. However, we have all the measures in place to avoid any such incidents.

- APSEZL mitigation plan included a cyber-security program, SOP across functions, cyber security awareness programs to employees and the development of business continuity plans.
- APSEZL has mandated annual trainings on cyber security for all the employees and conducts it with utmost rigor and sincerity. Any deviation will be dealt with as per applicable procedures laid out in relevant guidelines and policies. Also, awareness programs on Information Security are available to all employees and wherever applicable to third parties e.g., sub-contractors, consultants, vendors etc.

## LEADERSHIP INDICATORS

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

Yes, all the required information about our services has been uploaded on our website and can be accessed at:

Growth with Sustainability - Adani Ports and SEZ Ltd: <https://www.adaniports.com/>

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

Corporate Governance: Adani Ports and Logistics

**2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.:**

We continuously engage with our customers on a proactive basis to inform and educate them. We conduct a Survey annually to know their ESG performance and inform them about our policies.

**3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.**

During disruption/discontinuation of essential services, consumers are intimated through:

- a) Electronic communications
- b) Over telephonic calls.
- c) Corporate website (Adani Ports and SEZ Ltd) <https://origin-webapp.adaniports.com/>

**4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No):**

N/A

**5. Provide the following information relating to data breaches: Nil.**

- a) Number of instances of data breaches along with impact: N/A
- b) Percentage of data breaches involving personally identifiable information of customers: N/A