

21st September, 2023

**BSE Limited** 

P J Towers, Dalal Street, Mumbai – 400001. National Stock Exchange of India Limited

Exchange plaza,

Bandra-Kurla Complex,

Bandra (E), Mumbai - 400051.

Scrip Code: 512599 Scrip Code: ADANIENT

Dear Sir,

Sub: Submission of Business Responsibility and Sustainability Report (BRSR)

With reference to the captioned matter, we are attaching herewith the BRSR report of our Company for the financial year ended on 31<sup>st</sup> March, 2023 in PDF mode.

You are requested to take the same on your records.

Thanking you,

Yours faithfully, For **Adani Enterprises Limited** 

Jatin Jalundhwala

Company Secretary & Joint President (Legal)

Encl: As above

# Business Responsibility and Sustainability Report FY 2022-23

# **SECTION A: GENERAL DISCLOSURE**

# I. Details of the listed Entity

1	Corporate Identity Number (CIN) of the	L51100GJ1993PLC019067
	Listed Entity	25.73333,7337,233,7337
2	Name of the Listed Entity	Adani Enterprises Limited ("AEL/Company")
3	Year of incorporation	1993
4	Registered office address	"Adani Corporate House", Shantigram, Near Vaishnodevi Circle, S. G. Highway, Khodiyar, Ahmedabad – 382421, Gujarat, India.
5	Corporate address	"Adani Corporate House", Shantigram, Near Vaishnodevi Circle, S. G. Highway, Khodiyar, Ahmedabad – 382421, Gujarat, India.
6	E-mail	jatin.jalundhwala@adani.in
7	Telephone	+91 79 25555286
8	Website	www.adanienterprises.com
9	Financial year for which reporting is being done	01.04.2022 to 31.03.2023
10	Name of the Stock Exchange(s) where shares are listed	BSE Limited (BSE) and National Stock Exchange of India Limited (NSE)
11	Paid-up Capital	₹114 Crore
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Name: Mr. Pranav V. Adani Designation: Director DIN Number: 00008457 Telephone Number: (079) 2555 5665 Email ld: pranav.adani@adani.in
13	Unless stated otherwise, 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).	<ol> <li>Natural Resources (IRM and Mining Services)</li> <li>Solar Manufacturing</li> <li>Road, Metro, Rail and Water (RMRW)</li> <li>Airport Business</li> </ol>

### 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	Integrated Resources Management	End to End procurement & logistics services of minerals	72%
2	Mining	Mining & Mining Services	6%
3	Power Trading	Trading of Power	7%
4	Roads Business	Construction, operations & maintenance of road assets	4%
5	Airport Business	Construction, operations & maintenance of Airports	4%
6	New Energy Ecosystem	Cell & Module manufacturing	3%

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

Sr. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Integrated Resources Management	46610	72%
2	Mining	05101 & 05103	6%
3	Power Trading	46909	7%
4	Roads Business	42101	4%
5	Airport Business	52231	4%
6	New Energy Ecosystem	27900	3%

# 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	44 (includ	44			
International	7 (includi	7 (including offices)			

### 17. Markets served by the entity:

a. Locations	Number
National (No. of States)	16
International (No. of Countries)	7

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

Exports contribute to 0.09% of total turnover of AEL on a standalone basis.

# c. A brief on types of customers:

The Company is primarily serving B2B customers (IRM, Mining Services, Solar Manufacturing, Defence & Aerospace, Data Center, Roads Business and Power Trading) with a B2C Model only in case of the Airports business.

### IV. Employees

18. Details as at the end of Financial Year

# 1. Employees (including differently abled):

Particulars	Total (A)	M	ale	Female		
		No. (B)	% (B/A)	No. (C)	% (C/A)	
EMPLOYEES						
Permanent (D)	5,731	5,222	91.12%	509	8.88%	
Other than Permanent (E)	274	214	78.10%	60	21.90%	
Total Employees (D+E)	6,005	5,436	90.52%	569	9.48%	
WORKERS						
Permanent (F)	916	836	91.27%	80	8.73%	
Other than Permanent (G)	15,715	14,004	89.11%	1,711	10.89%	
Total Workers (F+G)	16,631	14,840	89.23%	1,791	10.77%	

# 2. Differently abled Employees and workers:

Particulars	Total (A)	M	ale	Female	
		No. (B) % (B/A)		No. (C)	% (C/A)
DIFFERENTLY ABLED EMPLOY	EES				
Permanent (D)	7	7	100%	0	0
Other than Permanent (E)	0	0	0	0	0
Total Employees (D+E)	7	7	100%	0	0
DIFFERENTLY ABLED WORKER	S				
Permanent (F)	0	0	0	0	0
Other than Permanent (G)	0	0	0	0	0
Total Workers (F+G)	0	0	0	0	0

# 19. Participation/Inclusion/Representation of women

	Total (A)	Number (B)	Percentage of Females % (B/A)
Board of Directors	9	1	11.11%
Key Management Personnel	6	0	0%

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

	Turnover Rate in FY 2022-23			Turnover Rate in FY 2021-22			Turnover Rate in FY 2020-21		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	13.97%	9.95%	13.57%	13.39%	10.94%	13.26%	14.25%	18.67%	14.33%
Permanent Workers	4.61%	1.39%	4.14%	7.87%	2.35%	7.47%	5.84%	0	5.80%

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

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

Sr. No.	Name of the holding /	Indicate whether	% of shares held by	Does the entity indicated
	subsidiary / associate	holding/ Subsidiary/	listed entity	at column A, participate
	companies / joint ventures (A)	Associate/ Joint		in the Business
		Venture		Responsibility initiatives
				of the listed entity?
				(Yes/No)

Refer to Form AOC-1 provided at page nos. 469 of this Annual Report for information on holding/subsidiary/ associate companies/joint ventures.

# VI. CSR Details

	Response
22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes
(ii) Turnover (in ₹Crore)	₹1,36,977.76 Cr
(iii) Net worth (in ₹Crore)	₹37,890.05 Cr

# 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	Grievance Redressal		FY 2022-23		FY 2021-22		
whom complaint is received	Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	NIL	NIL	NIL	NIL	NIL	NIL
Investors (other than shareholders)	Yes	NIL	NIL	NIL	NIL	NIL	NIL
Shareholders	Yes	25	1#		8	0	NIL
Employees and workers	Yes	NIL	NIL	NIL	NIL	NIL	NIL
Customers	Yes	1,504*	0	NIL	1,448	0	NIL
Value Chain Partners	Yes	NIL	NIL	NIL	NIL	NIL	NIL
Other (please specify)	NIL	NIL	NIL	NIL	NIL	NIL	NIL

<sup>\*</sup> The number of customer complaints mentioned in above table pertains to Airport business which is the only B2C business of AEL.

#Complaint was received on 27 March 2023. As on date of this report, the said complaint has been resolved.

Weblink: https://www.adanienterprises.com/-/media/Project/Enterprises/Investors/corporate-governance/Polices/ Employee-Grievance-Management-Policy.pdf

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

Sr. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate the positive/ negative implications)
1	Employee Health, Safety and Well-Being	Risk	Failure to ensure the health, safety and well-being of the Company's workforce can impact productivity. This can consequently affect our business operations, customer satisfaction and profitability.	The primary goal of the Company is to promote a secure workplace and prioritize the concept of Zero Harm. Regular assessments are conducted to identify potential hazards and risks, and corresponding plans are developed to minimize their impact. Moreover, employees and workers receive frequent safety trainings to ensure their overall well-being.	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	Community Development	Opportunity	Community development activities help the Company to create a positive impact on society by undertaking meaningful interventions to bring significant benefits to large sections of society. The CSR efforts also help foster a more productive and positive work environment for employees.	The Adani Foundation is dedicated to generating sustainable opportunities for underprivileged communities through initiatives such as enhancing education, promoting sustainable livelihoods, fostering a healthy society, and supporting rural infrastructure development. Currently, the Adani Foundation has reached out to 5,753 villages across 19 states in India.  Driven by the goal of fostering overall community development, Adani Foundation actively contributes to the global effort of achieving the Sustainable Development Goals (SDGs).	Positive
3	Ecologica Impact	Risk	Reducing the Company's ecological impact is crucial to mitigating climate change and the physical and transition risks that accompany it.	AEL has implemented a range of policies such as the Climate Change Policy, Resource Conservation Policy, Water Stewardship Policy, and Energy Management Policy, with the aim of minimizing its ecological footprint.	Negative
4	Business Ethics, Integrity and Transparency	Risk	Ethical conduct, integrity and transparent two-way communication with stakeholders are integral to ensuring regulatory compliance and building stakeholder trust.  Nonadherence to business ethics and integrity related compliance obligations can lead to legal fines and penalties, financial forfeiture, damage to brand reputation, loss of business opportunities and valuation.	Our dedication to the personal and collective integrity is of utmost importance to us. This is evident in our adherence to government regulations, standards set by regulatory agencies, and global peer standards. Throughout the years, we have continuously reinforced our commitment to various aspects, such as gender respect, maintaining a zero-tolerance policy for sexual harassment and ethical transgressions, ensuring fair recruitment and unbiased performance evaluations, treating individuals and the environment with dignity and integrity, and abiding by the laws of the countries in which we operate.	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)
				To ensure ethical practices within our organization, we have established and implemented a Code of Business Conduct and Ethics that is applicable to all members of our Board and senior management personnel. This code aligns with the requirements of corporate governance as specified in the SEBI Listing Regulations. Additionally, all employees across the Adani Group, including AEL, are expected to adhere to the Adani Group's Code of Conduct.	
5	Human Rights	Risk	Failing to address human rights issues can risk damaging brand value and reputation and can also bring an increasing risk of litigation and of non-compliance with a growing body of legislation in the area.	The Company has established a platform at both the Group Level and within each individual entity, which plays a crucial role in assisting and guiding the management's efforts to promote sustainable Human Rights practices. The Group HR, in collaboration with Business HR, holds the responsibility of ensuring that any human rights concerns or effects are effectively dealt with in accordance with the prescribed procedures and within the given timeframe.	Negative
6	Water	Risk	We are directly affected by the availability and quality of water considering the nature of business operations. Water scarcity can interrupt our business operations, disrupt supply chains, raise the costs of raw materials, and put employee's and community's health and safety at risk. It may also lead to loss of social license to operate due to competition for water with local communities.	Due to the significant role of water in our operations, it becomes essential for us to prioritize its efficient utilization and strive for water security. Our water management strategy involves various measures such as minimizing freshwater consumption, implementing water recycling and reusing practices, and implementing water-saving initiatives. To guide our actions, we have implemented a Water Stewardship Policy, which acts as a guiding principle in reducing water consumption and conserving water whenever possible.	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)
7	Waste Management	Risk	Waste management has become a global issue impacting the environment and health of the people. Industries are one of the large generators of hazardous waste and are directed by the pollution control board (PCB) for waste management practices. Not abiding to the practices prescribed the PCBs may lead to legal penalties and impact the brand image.	At AEL, we have implemented a Resource Conservation Policy that acts as a guiding principle to minimize waste generation, implement appropriate waste treatment measures, and ensure environmentally friendly disposal practices. The Company has established specific procedures for waste management at each of its sites or locations. Our approach is based on the fundamental principle of segregating waste at its source and embracing the 3R concept of "Reduce, Reuse, and Recycle."	Negative
8	Energy and Emissions management	Risk /Opportunity	Considering India's commitment to become NET ZERO by 2070, stringent energy and emission related laws and regulations may be enacted for companies to follow. If as a Company we are not prepared in time to comply with these emerging laws and regulations, we may face additional unexpected cost to comply as a result of not timely anticipating to the new requirements. Business restrictions leading to loss of revenue and/or additional costs may also force our business to change our business model.	Energy represents a significant portion of overhead costs of our businesses. However, we recognize the potential for cost savings by implementing various energy efficiency initiatives. These may include utilizing high-energy efficient equipment, incorporating on-site renewable energy installations whenever feasible, and other measures. By adopting these practices, we not only reduce carbon emissions but also achieve cost savings. Our goal to eliminate direct greenhouse gas emissions from our operations not only reduces overhead costs but also enhances our energy supply resilience. Furthermore, it attracts investors who are increasingly concerned about carbon emissions as a risk factor. This commitment may also enable us to explore new business prospects in the clean technologies sector.  To demonstrate our dedication, we have established Adani New Industries Limited as a subsidiary of our Company. Additionally, the Adani Group's businesses have planned investments	Negative / Positive

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)
9	Labor Practices	Risk / Opportunity	Risk: Failing to manage sound labor management practices can lead to prosecution by regulators, insurance claims due to accidents and injuries, reduce employee motivation in turn leading to loss of productivity and also hamper the brand image and reputation.  Opportunity: Ensuring sound labour practices allows the organisation to avoid regulatory action, penalties and empower its employees and workers.	In case of risk:  The energy-intensive characteristics of our business operations compel us to prioritize both energy conservation and the incorporation of clean energy sources into our overall energy mix.  To guide and formalize our efforts, we have implemented an Energy Management Policy. This policy outlines our commitment to managing energy consumption, reducing emissions, integrating renewable energy sources whenever possible, and adopting efficient energy usage practices. To ensure that we achieve our resource conservation objectives, we consistently monitor our energy performance across all our operational units.  Our unwavering commitment remains to ensure a safe work environment for all individuals, including our employees, contractual workers, visitors, and the broader community. To achieve this, we have embraced the Adani Group's Safety Management System, which prioritizes enhancing working conditions, creating a favorable work environment, and safeguarding and promoting the health of our workers.  To effectively manage contractual labor, we have implemented a robust Contract Labor Management System. Through a thorough registration process, we ensure that every member of our contractual workforce is of legal age for employment, as defined by the applicable legal authority. Furthermore, we have established a grievance redressal process at our various locations to address any concerns raised by our employees.  As an organization, we strictly adhere to all relevant laws governing human rights and labor practices in the countries where we operate. We strive to uphold these regulations and ensure compliance with them in every aspect of our operations.	Negative / Positive

Sr. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate the positive/ negative implications)
10	Climate Change Adaption and Mitigation	Risk /Opportunity	Climate change-related regulations focused on mitigation (e.g. carbon pricing) have a direct impact on AEL business. Emerging and potential regulations may introduce or escalate regulatory risks.	To effectively manage and mitigate risks associated with emerging regulations, AEL leverages the expertise of subject matter experts as needed. These experts assist in identifying and addressing potential risks and impacts, including those related to regulatory compliance, health and safety, environmental and community considerations, as well as reputation.  Furthermore, we also recognize that climate change presents opportunities for us. The transition towards low-carbon practices opens doors for efficiency improvements, innovation, and growth. By investing in clean technologies, AEL's businesses can achieve cost savings in energy and materials, meet evolving customer demands, enhance their reputations, and attract and retain top talent. This commitment to reducing emissions, not only within our own operations but also those of our customers and suppliers, can lead to a range of positive outcomes.  The establishment of Adani New Industries Limited as a subsidiary of AEL and the Adani Group's huge investment plan across the energy transition value chain further demonstrate our dedication and recognition of the opportunities presented by addressing climate change.	Negative / Positive

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)
11	Responsible Supply Chain	Opportunity	Organizations are under increased pressure from investors, customers, and regulators to mitigate environmental, social and governance (ESG) risk exposures within their supply chain. Not having sustainable supply chain management practices, a company may be exposed to more risks including labor disruptions, workforce health and safety incidents, human rights issues, and shortages of raw materials.		Positive

# SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

Sr. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	Р9		
	Policy and management processes		Į.									
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 Yes Yes th all the fire of the fir	Yes		
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes		Yes		
	c. Web Link of the Policies, if available		://www nance	.adani	enterp	rises.c	om/in\	estors	/corpo	rate-		
2	Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes		
3 [	Do the enlisted policies extend to your value chain partners? (Yes/No)  Yes. The suppliers are required to comply with all the applicable Company's policies including ESG, as stated Suppliers Code of Conduct.											
4	Name of the national and international codes/ ISO 14001: 2015											
	Stewardship Council, Fairtrade, Rainforest											
	Alliance, Trustea) standards (e.g. SA 8000,	• IS	0 900	1: 201	8							
	OHSAS, ISO, BIS) adopted by your entity and	• IS	0 260	00: 20	010							
	mapped to each principle.	• G	RI Star	ndard								
		• A	dani So	olar: P\	√ Cycle	e – Glo	bal Me	mbers	hip			
			lumbai ccredit					ted: Ai	rport (	Carbon		
		• T	RV (Ker	rala) In	ternati	onal Ai	rport L	imited:	ACA L	evel 2		

١	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	Р9	
	Specific commitments, goals and targets set by the entity with defined timelines, if any.	deve ove obje	Compa elopmen rarching ective ac erprises	t close object cts as that p	ely cor tive of a gui propel	respor foster ding p India's	nds to ring Na princip econ	the A stion E le for	dani ( Buildin invest	∂roup g. Th :ing	
		Gov ESG enc env	part of rernance of framew ompass ironmen	(ESG) ork wit a ranç tal an	consident of the consideration	leratio goals a areas ial im	ns, AEl nd am aimed	has a bitions at dri	well-d s. Theso ving p	efin e goa ositi	
		<ul><li>Energy and Emissions:</li><li>Airport Business - work towards achieving</li></ul>									
		•	Airport 4+ (Net airports	Zero d	carbon						
		•	Data Ce center of Renewa	nter - compa	aim to	power	all its				
		•	Airport operation					iesses	to b	ecoi	
		<ul> <li>Green building certification for Adani d solar and airport new sites, wherever feas</li> </ul>								cent	
		<ul> <li>Aligning with the recommendations of Tas Climate-related Financial Disclosures (TCF</li> </ul>						rce			
		Reducing the Energy and Emission Intensity p Rupee of Turnover.									
		Wat	er Mana	gemer	nt:						
		•	Becoming a net water positive company b								
			Land Us				•				
			No net I IBBI (Inc							ic W	
		•	Circular	Econo	my and	d Wast	e Man	ageme	ent:		
		<ul> <li>Zero waste to landfill certification for AEL opsites (Airports, Data Center, Adani Road wherever feasible.</li> </ul>									
		Hun	Wherever reasible.  Human Rights:								
		•	Become	a sign	atory t	o UN	Global	Compa	act (UI	NGC	
		•	No геро				-	e or fo	rced la	bor.	
			Innovati								
		•	IT enab disclosu	res acı	oss AE	EL busi	nesses		dicato	rs a	
		•	Health,				-				
		•	Achieve systems				-	inst	itution	alizi	

No.  Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.  Benergy Intensity (GJ per Rupee of Turnover) Achieved a reduction of 26% against the baselin year of FY 21-22.  Emission Intensity (MtCO2e per Rupee of Turnover) Achieved a reduction of 55% against the baselin year of FY 21-22.  Water Intensity (Water consumed in KL per Rupee of Turnover): Achieved a reduction of 28% against the baselin year of FY 21-22.  Single Use Plastic (SUP) Free: Mumbai airport is SUI free for own operations.										Р9
<ul> <li>The Mumbai Airport has achieved the prestigiou ACA 4+ certification, a distinction held by onl three airports in Asia for the efforts taken toward Decarbonization.</li> </ul>	commitments, goals and targets along-with reasons in case the same are not met.	Targe  A ye  A ye  NT  Sift  TI  A th	ts and nergy chievedear of F mission chievedear of F //ater In urnove aseline ingle U dee for 0 the Mu CA 4+ nree ain	Intensited a reserved	taken laste (sity (for duction 2).  sity (for duction 2).  sy (Wathieved of FY 2).  stic (Sign arrivation Airport fication in Asi	ast years of 2 per con a reduction of 5 per co	er Rup 26% ag e per F 55% ag sumed juction ee: Mu achiev distinc	ndicate  pee o  painst  Rupee painst  in KL  of 28%  mbai a  ed the tion h	ed below of Turn the base of Turn the present of the base of th	nover): aseline nover): aseline pee of ast the is SUP asigious y only

Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements

At Adani Enterprises Limited, we have embarked on a journey of incubating sustainability across all our business verticals, which is reflected in our increasing investments in climate resilient services and energy transition. Our seemingly diverse forays into Airports. Natural resources. Data center, Solar manufacturing, Renewable energy, Defence and aerospace, among others, are guided by our philosophy of building 'adjacency' to infrastructure – the core foundation of a nation's progress and prosperity. These businesses converge to reinforce our commitment to nation building, and in turn, help to usher in shared prosperity for millions of lives.

As we continue to grow our business and drive progress for our country, we remain committed to reducing our environmental impact and addressing any potential adverse effects. In order to tackle these challenges, we have established formidable objectives that are in line with our dedication to achieving ESG superiority. Our strategic objectives encompass the reduction of greenhouse gas emissions, optimization of water usage, enhancement of waste management practices, and promotion of biodiversity conservation. We have implemented strong frameworks to prioritize the safety, health, and well-being of our valued employees, while also promoting diversity and inclusion throughout our workforce.

As a Company, we acknowledge the imperative to shift towards a low-carbon economy and are resolute in our efforts to curtail our carbon footprint. Our aim is to achieve Operational Net Zero for our key businesses, namely Airport and Data Centre, by 2030. Our Company has made a substantial investment in renewable energy to enhance our energy portfolio and advance sustainable power production.

Sr. No.	Disclosure Questions	P1	P2	Р3	P4	P5	P6	P7	P8	P9
		reducto the imple proces we hengage education as	tion of e base mente sses to ave s gement ition, s	55% is seline yet cutton improved the continuities of the continui	in our year. (ing-ed ing-ed in	emissinger Co ge teo source execut with ment,	on intermony hnology effici ed m a str	ensity y has gies ar ency. ultiple ong e ealthc	a rema as com succe nd opti Furthe comr emphas are, res ty of I	npared ssfully imized rmore, munity sis on sulting
		ESG work	objecti towar	ves w ds fur	ill per ther s	sist, a	nd we nening	will the	cation contin sustain ses.	uously
		excell appre to ge	ence i ciates nerate	s a co your s susta	ntinuo upport sinable	us jou : and e	ney. C ngager for a	our cor ment in Il our	hieving mpany n our m stakeh nt.	highly nission
8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Respo Indep the Bo by AE gives	nsibili enden pard of L bus	ty Cor t Direct Directinesse nce to	mmitte ctors. <sup>-</sup> tors in s agai o the E	ee (CR The CR formed nst the	C) cor C is ta about E ESG	nsisting sked the processing the comments of t	a Cor g entir with ke rogress nitment check o	ely of eeping made as and
		Name	of Me	mber		Co	mposit	ion of	Comm	ittee
			emant 102658		kar			•	Execul	tive &
			Subra )03577		n			`	xecutiv rector)	
			/ijaylax )0032(		shi				xecutiv rector)	ve &
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.	has comp meets	onstitu rising s on a	uted a solely quarte	Corp of the erly ba	orate f e Indep	Respor Dender discus	nsibilit nt Dire s the :	s const y Come ectors, sustain	mittee which

# 10. Details of Review of each NGRBCs by the Company

Subject for Review		lerta	ken l	by Di	rect	r revi or / C ner C	omn	nitte					•		•	•	early ecify	
	P1	P2	P3	P4	P5	P6	P7	P8	Р9	P1	P2	P3	P4	P5	P6	P7	P8	Р9
Performance against above policies and follow up action	С	С	С	С	С	С	С	С	С				Qu	iarte	rly			
Compliance with statutory requirements of relevance to the principles and, rectification of any non-compliances.	С	С	С	С	С	С	С	С	С				Qı	uarte	rly			
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.							P3 No	P4 No	P5 No	P6 No	P7 No	P8 No	P9 No					

# SECTION C: PRINIPLE WISE PERFORMANCE

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

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

Segment	Total number of training and awareness programs held	Topics / principles covered under the training and its impact	Percentage of persons in respective category covered by the awareness programs
Board of	1	ESG regulatory framework	100%
Directors		<ul> <li>Emerging Trends in ESG</li> </ul>	
and KMPs		<ul> <li>Role of Board of Directors in driving ESG</li> </ul>	
Employees	574	Prevention of sexual harassment	58%
other than		<ul> <li>Employee well-being programs</li> </ul>	
BoD and KMPs		<ul> <li>Insider Trading Programs</li> </ul>	
		<ul> <li>Introduction to ESG</li> </ul>	
		<ul> <li>Occupational Health and Safety</li> </ul>	
		<ul> <li>Airport Regulations, Concession Agreement covering Ethics &amp; transparency principles.</li> </ul>	
		Advanced Communication Skills	
		Business Ethics and Integrity	
		Sustainable Supply Chain	
Workers	19	Occupational Health & Safety	45%
		<ul> <li>Human Rights</li> </ul>	
		<ul> <li>Working Conditions</li> </ul>	
		Prevention of Harassment and abuse	
		Cyber Security Awareness	
		<ul> <li>Insider Trading policy</li> </ul>	
		Skill Upgradation	
		<ul> <li>Introduction to ESG</li> </ul>	

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

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

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

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Not Applicable	Not Applicable

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

Yes. The Company has a comprehensive Anti-Corruption and Anti-Bribery (ABAC) Policy.

The Company is deeply committed to maintaining the highest standards of transparency and accountability across all its operations. It diligently strives to fulfill its purpose by complying with both national and international legal and ethical requirements. The Company unequivocally condemns any form of bribery, fraud, or corruption, and it is fully committed to upholding all relevant laws that combat these unethical practices.

The ABAC Policy establishes the underlying principles and values that guide all stakeholders in ensuring compliance with applicable laws, rules, and regulations. The Company also ensures compliance with all antimoney laundering laws applicable in the jurisdictions where it conducts business, including fulfilling any necessary registration and reporting obligations for suspicious transactions.

The ABAC Policy applies to all transactions, dealings, and expenses conducted on behalf of the Company. This policy extends to all stakeholders working for or representing the Company, as well as its subsidiaries, and mandates strict adherence to its principles.

Weblink: https://www.adanienterprises.com/-/media/Project/Enterprises/Investors/corporate-governance/Polices/ANTICORRUPTION--ANTIBRIBERY-POLICY.PDF

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

	FY 2022-23	FY 2021-22
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

#### 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	NIL	Not Applicable	NIL	Not Applicable	
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	NIL	Not Applicable	NIL	Not Applicable	

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

Yes, the Company has developed a Code of Conduct that details out the processes in place to avoid and manage conflict of interest. The Code of Conduct is applicable to all the members of Board and Senior Management of 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.

The Code of Conduct can be referred at:

https://www.adanienterprises.com/-/media/Project/Enterprises/Investors/corporate-governance/Polices/ Code of Conduct.pdf

Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe.

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

	FY 2022-23	FY 2021-22	Details of improvements in environmental and social impacts
R&D	NIL	NIL	NA
Capex	₹16,049 Cr	₹40,654 Cr	

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

Yes. Adani Enterprises is prima facie a service-oriented company having largely the Business to Business (B2B) model. However, all our procurement follows the principles of sustainable sourcing wherever feasible.

However, currently the percentage of sustainably sourced inputs has not been mapped for AEL.

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.

Considering the nature of AEL's businesses, the Company has very limited scope when it comes to reusing, recycling, and disposing of products at the end of their lifespan.

Nevertheless, the Company has established specific procedures for waste management at each of its sites or locations. For hazardous waste, the Company ensures compliance with relevant regulatory requirements and adheres to the best industry practices. These measures include proper handling, segregation, storage, and transportation of hazardous waste. The disposal of hazardous waste is carried out in an environmentally responsible manner through authorized vendors who recycle the waste in accordance with applicable regulations.

Apart from hazardous waste, the Company also encounters significant volumes of non-hazardous waste, such as overburden (generated by mining activities), scrap metal, wood waste, glass, tires, e-waste, cardboard, and paper. Our strategic objective is to minimize waste generation and divert waste from disposal by promoting reuse and recycling whenever feasible. Across all our businesses, we are actively working towards achieving Zero Waste to Landfill certification wherever possible.

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

Considering to the nature of the AEL's business, EPR is not applicable to the Company.

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

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

Category Total (A)		% of employees covered by										
				Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities		
	Number (B)	% (B/A)	Number (C)	% (C/A)		% (D/A)	Number (E)	% (E/A)	Number (F)	% (F /A)		
Permanent em	ployees	3						`			-	
Male	5,222	5,222	100%	5,222	100%	-	-	5,222	100%	810	15.51%	
Female	509	509	100%	509	100%	509	100%	-	-	138	27.11%	
Total	5,731	5,731	100%	5,731	100%	509	8.88%	5,222	91.12%	948	16.54%	
Other than Pe	rmanen	employ	ees									
Male	214	214	100%	214	100%	-	-	214	100%	133	62.15%	
Female	60	60	100%	60	100%	60	100%	-	-	52	86.67%	
Total	274	274	100%	274	100%	60	21.90%	214	78.10%	185	67.52%	

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	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F /A)	
Permanent Wor	kers											
Male	836	836	100%	836	100%	-	-	836	100%	315	37.68%	
Female	80	80	100%	80	100%	80	100%	-	-	71	88.75%	
Total	916	916	100%	916	100%	80	8.73%	836	91.27%	386	42.14%	
Other than Perr	naneni	Worker	S									
Male	14,004	13,409	95.75%	14,000	99.97%	-	-	12,054	86.08%	6,943	49.58%	
Female	1,711	1,639	95.79%	1,711	100%	1,711	100%	-	-	1,149	67.15%	
Total	15,715	15,048	95.76%	15,711	99.97%	1,711	10.89%	12,054	76.70%	8,092	51.49%	

### 2. 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%	Yes	100%	100%	Yes	
Gratuity	100%	100%	Yes	100%	100%	Yes	
ESI*	100%	100%	Yes	100%	100%	Yes	
Others – Pls specify	NIL	NIL	NIL	NIL	NIL	NIL	

<sup>\*</sup> Note: All eligible employees and workers are covered under ESI. For the Business locations which don't come under the purview of ESI, the workforce is covered under the Workmen's Compensation Act 1923.

# 3. Accessibility of workplaces

Our corporate office embraces inclusivity and ensures the rights of differently abled employees and workers as outlined in the Rights of Persons with Disabilities Act, 2016. We are committed to promoting equal opportunities and recognize the significance of fostering a diverse and fair work environment. To facilitate the successful performance of employees with disabilities, we have implemented various measures in our workplaces.

We have specifically designed our workspaces to facilitate and support employees with disabilities by providing necessary assistance or modifications to their positions or work environments. Our corporate office features ramps at entry points and lobbies to facilitate wheelchair access. Additionally, we have dedicated restrooms and parking slots for differently abled employees, elevators equipped with braille signs to assist blind or visually impaired individuals.

We have taken a comprehensive approach to ensure accessibility for differently abled employees in all aspects of our existing and new infrastructure. This includes the design of work areas, restrooms, common areas, and movement areas within and around our facilities, with careful consideration given to all accessibility requirements.

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

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

We foster an inclusive work environment that encourages a supportive and professional culture, emphasizing trust, empathy, and mutual respect. Our commitment to diversity, equality, and inclusion is reflected in the development of our policies.

Weblink: https://www.adanienterprises.com/-/media/Project/Enterprises/Investors/corporate-governance/ Polices/Policy-on-Diversity-Equity-and-Inclusion.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	100%	100%	100%	100%		
Total	100%	100%	100%	100%		

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

(If Yes, then give details of the mechanism	in brief)
Permanent Workers	Yes.
	We have established an online mechanism for addressing grievances raised by our permanent employees and workers. This system is specifically designed to resolve grievances within a specified period of 14 working days. We ensure that all grievances are handled fairly and with the utmost confidentiality, prioritizing a time-bound resolution process.
Other than Permanent Workers	Yes.
	Contractual workers can report their grievances either to their contractor representative or the supervisor from Adani. It is the responsibility of the contractor to take the necessary steps to address these grievances. If needed, the contractor may escalate the grievance to the site HR department and the relevant functional heads for further resolution.
Permanent Employees	Yes.
	In addition to the online grievance redressal platform, AEL has implemented a policy that addresses the prevention, prohibition, and redressal of sexual harassment against women in the workplace. We have established Internal Complaints Committees (ICCs) in compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013. These committees are entrusted with the responsibility of conducting inquiries into complaints related to sexual harassment.
	To ensure the prevention of sexual harassment in the workplace, we regularly conduct workshops, group meetings, online trainings and awareness programs for our employees. These initiatives are held on a regular basis and aim to sensitize our employees about the importance of preventing sexual harassment and creating a safe work environment.
Other than Permanent Employees	Yes.
	Suppliers, consultants, retainers, clients, or any other parties engaged on a project or periodic basis are subject to the terms and conditions specified in their contracts. In the event of grievances, they have the option to raise their concerns with the relevant HR Business Partners and the respective department heads as per the established procedures.

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

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

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 (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	
Total	NIL	NIL	NIL	NIL	NIL	NIL	
Permanent Employees							
-Male	NIL	NIL	NIL	NIL	NIL	NIL	
-Female	NIL	NIL	NIL	NIL	NIL	NIL	
Total Permanent Workers	NIL	NIL	NIL	NIL	NIL	NIL	
-Male	NIL	NIL	NIL	NIL	NIL	NIL	
-Female	NIL	NIL	NIL	NIL	NIL	NIL	

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

Category	FY 2022-23					ory FY 2022-23			F	Y 2021-2	2	
	Total	On H & sa meas			Skill dation	Total	and s	ealth afety sures		Skill dation % (F/D)		
	(A)	No. (B)	% (B/A)	No. (C)	% (C/A)	(D)	No. (E)	% (E/D)	No. (F)	_		
Employees												
Male	5,436	3,085	56.75%	3,755	69.08%	4,159	1,927	46.33%	2,941	70.71%		
Female	569	170	29.88%	252	44.29%	349	105	30.05%	185	53.01%		
Total	6,005	3,255	54.20%	4,007	66.73%	4,508	2,032	45.08%	3,126	69.33%		
Workers												
Male	14,840	9,896	66.68%	5,510	37.13%							
Female	1,791	633	35.34%	434	24.23%							
Total	16,631	10,529	63.31%	5,944	35.74%							

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

We have implemented a robust Performace Management Process (PMS) with the goal of ensuring clarity and transparency in every step of the process and the expectations from the workforces involved. This process encompasses various activities such as performance measurement during the year-end review, rating and promotion recommendations, moderation, and individual feedback.

All the eligible employees, including permanent workers, undergo an annual performance appraisal process as prescribed by the Company. In the case of other than permanent workers, their performance evaluation is conducted by the contractors in accordance with the conditions outlined in the agreement.

Category		FY 2022-23		FY 2021-22			
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)	
Employees							
Male	5,436	4,819	88.65%	3,976	3,635	91.42%	
Female	569	462	81.20%	285	266	93.33%	
Total	6,005	5,281	87.94%*	4,261	3,901	91.55%	
Workers							
Male	836	793	94.86%	710	698	98.31%	
Female	80	79	98.75%	80	80	100%	
Total	916	872	95.20%*	790	778	98.48%	

Note: The data on performance and career development reviews is for all employees and permanent workers. \* The balance employees and workers were not eligible for PMS, considering their tenure in the Company.

#### 10. Health and safety management system:

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

Yes. The Company has embraced and executed the Safety Management System framework of the Adani Group by integrating all crucial business activities and applying principles and processes to ensure secure and healthy workplaces across all business locations. The aim is to prevent work-related injuries and illnesses, minimize risks, and consistently enhance the safety performance.

The Adani Safety Management System encompasses Eight key elements: Performance orientation, Executive commitment, Teamwork orientation, Employee empowerment & Enlistment, Scientific Decision-making, Continual improvement, Comprehensive & Ongoing training, and Unity of purpose.

Seven Safety Taskforces on Standards & Procedures, Contractor Safety Management, Training & Capability, Logistics Safety, Safety Interaction, Incident Investigation & Audits and Technological Intervention is very well established and are functioning as per the charter and three tier governance process.

Majority of AEL business locations are certified to ISO 45001:2018 (OHSMS).

The operational businesses have also linked the Group Safety Management System with their existing Integrated Management System (IMS), e.g., ISO 14001 (EMS), and ISO 45001 (OHSMS).

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

The Adani Group has implemented globally recognized and comprehensive Safety Intervention and Risk Assessment programs, such as Safety Interaction (SI), Vulnerability Safety Risks (VSR), Site Risk Field Audits (SRFA), Process Hazard Analysis (PHA), and Pre-Startup Safety Review (PSSR). These programs have been aligned with the Business-specific Integrated Management System, which is based on the Hazard Identification and Risk Assessment Process, such as HIRA and JSA. The Company has embraced this framework, and the reporting businesses have fostered a participative and consultative approach to engage all relevant stakeholders, including employees, associates, and contract workers.

Safety Assurance & Due diligence program on internal Group Safety processes are conducted periodically by Group Safety Team for Adani sites basis project criticality and risk severities.

Group Technological Intervention Taskforce has also facilitated initiation and deployment of technology-based solutions to minimize operational risks and increase efficiency.

The Company acknowledges the need to manage and mitigate dynamic risks according to the Hierarchy of Control in order to safeguard its stakeholders and achieve the objective of Zero Harm, while enabling sustainable growth.

These interventions combine a comprehensive understanding of the potential positive and negative impacts of various job and personal factors on the organization. The ultimate goal is to prevent injuries, protect assets, and create sustainable value across all activities and processes within the organization.

# 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 effectively utilizes the well-established Incident Management and Investigation System of the Adani Group to ensure fair and transparent reporting of work-related hazards and risks, including unsafe acts, unsafe conditions, near misses, injuries, illnesses, and serious incidents. This process is followed by a comprehensive Root Cause Failure Analysis, the development of corrective actions based on the Hierarchy of Controls, their tracking, monitoring, and subsequent closure.

The outcomes and insights gained from these events and incidents are shared horizontally across the Group through a systematic process called 'Critical Vulnerable Factor' (CVF) as part of the Group's 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 these activities, the Adani Group has implemented an advanced digital platform for Occupational Health and Safety (OH&S) reporting. All the company employees and workers can access this platform through its website as well as using its mobile application.

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

Yes, all the employees and workers have access to non-occupational medical and healthcare services.

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

	Category	FY 2022-23	FY 2021- 22
Lost Time Injury Frequency Rate	Employees	0	0
(LTIFR) (per one million-person hours worked)	Workers	0.141	0.076
Total recordable work-related injuries	Employees	0	0
	Workers	23	12
No. of fatalities	Employees	0	0
	Workers	1	0
High consequence work-related injury	Employees	0	0
or ill- health (excluding fatalities)	Workers	0	0

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

The well-being and safety of our personnel hold paramount significance for us. In order to accomplish this, we have embraced a collaborative approach that emphasizes shared responsibility. We engage with individuals at all levels of our workforce and work towards reinforcing a safety culture throughout all our Company's operations. Our objective is to reduce reportable incidents, minimize injuries, and consistently monitor the safety performance of our sites.

One of the fundamental principles of Growth with Goodness at Adani Group is taking care of people through the realms of "Zero Harm culture". It is our conviction to promote "Culture of Care" so that every activity is performed in a safe manner which facilitates continual growth and sustainability of our businesses for 'Generative Safety Culture' through 'Top Down' and 'Bottom's Up' Approach.

Our efforts have been concentrated into Three Safety Enablers viz. 'Organization & Culture', 'Systems & Processes' and 'Equipment & Facilities' for paving way towards reaching to "Safety Integral Stage" of Integral Culture Model.

Adani Group has established comprehensive Safety Management Systems that are aligned with international standards and best practices. These systems encompass policies, procedures, and quidelines aimed at identifying, assessing, and mitigating workplace hazards and risks. They provide a structured framework for promoting safety awareness and ensuring compliance with safety regulations. All businesses under AEL are align with Group's Safety Management Systems.

We conduct regular training and awareness programs to equip employees and contractors with the necessary knowledge and skills to identify and address workplace hazards. These programs cover various aspects such as safe work practices, emergency response procedures, proper handling of equipment and machinery, and the use of personal protective equipment (PPE). This year, Data Center business has taken various digital initiatives like Virtual Reality based trainings for High-Risk Activities to sensitize workers, Al based monitoring etc. While Solar manufacturing has implemented robust mechanism to drive safety system through seven different task forces in line with Group Safety guidelines. At Airport business, regular safety audits / inspections are carried out to identify the hazards / unsafe conditions existing in the workplace and appropriate mitigation measures are taken to eliminate such hazards. Besides this, a stringent work permit system in place and various programs like Toolbox talks, task briefing, job specific training, job safety analysis and mock drill help us in building a safety culture within our businesses.

We encourage active employee engagement and participation in safety initiatives. Employees are encouraged to provide feedback, share safety concerns, and contribute to the development and implementation of safety programs. This inclusive approach fosters a safety culture where everyone feels responsible for their own safety and the safety of others.

# 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	NIL	NIL	NA	NIL	NIL	NA		
Health & Safety	NIL	NIL	NA	NIL	NIL	NA		

#### 14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100%
Working Conditions	100%

# 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.

Every incident is subject to a comprehensive investigation in accordance with the Group Safety Guidelines on Incident Reporting & Investigation. The learnings from these investigations are then disseminated across various sites to prevent the recurrence of similar incidents. Additionally, we actively encourage employees and workers to report any unsafe acts and conditions they observe, aiming to eliminate such incidents entirely.

In AEL's Natural Resources business, we have deployed the 'Ground Zero Safety Personnel (GZSPs)' to identify hazards & assess the risk on the spot wherein a team consisting of 5-7 persons from each site shall inspect the workplace in two categories: General Inspection for initial 15 days and Purposeful inspection from remaining 15 days of the month. Inspection reports are then discussed with site leadership. In AEL's Solar Manufacturing business, we have ensured the provision of 360-degree machine guarding to all the machineries along with the continuous all vehicle inspections, segregation of pedestrian walkways in entire facility, assessment and authorization of MHE (Material handling equipments). At our Mumbai Airport, we have installed and commissioned the weather monitoring station in air-side for effective adverse weather operations management.

#### Leadership Indicators

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

Yes, to provide protection and assistance to the employees in times of uncertainty and distress, we have implemented a policy known as 'Group Term Life Insurance'. Its purpose is to safeguard and support employees during unfortunate circumstances. We also have 'Employee Death Relief Policy' with an objective to provide comprehensive assistance to the family of deceased employees (natural death or accidental death), on the rolls of the Company, who die while in service. All the workers are also covered under Accident insurance policy in compliance with statutory obligations.

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

We carry out regular reviews and checks to ensure compliance with statutory obligations pertaining to workers in our value chain, including the timely payment of wages and social security benefits. If any noncompliance occurs, strict measures are taken against business partners who fail to meet these obligations.

3. Provide the number of employees / workers having suffered high consequence work-related injury / illhealth / 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:

		r of affected s / workers	No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment			
	FY 2022-23	FY 2021-22	FY 2022-23	FY 2021-22		
Employees	0	0	NA	NA		
Workers	1	0	0	NA		

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

Yes, after the retirement age and as per business requirements, some of the distinguished employees are retained as advisors / consultants. Additionally, throughout their employment, various skill enhancement programs are provided to employees to ensure their continued employability.

5. Details on assessment of value chain partners.

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100%
Working Conditions	100%

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.

For all critical contractors and suppliers, both pre and post qualification reviews are conducted which coverers review of their OHS management system, policies and procedures, organisation structure, commitment, etc. We also have a practice of conducting Safety Risk Field Audits (SRFA) to identify the working conditions that needs further improvement and Suraksha Samwaad to identify areas of improvement in Health & Safety.

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

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

Adani Enterprises Ltd (AEL) recognizes the significance of engaging with key stakeholder groups to ensure effective communication, transparency, and collaboration. The identification of these stakeholders involves a comprehensive process that considers the diverse range of individuals and entities impacted by the company's operations.

The process of identifying key stakeholder groups at AEL involves a comprehensive analysis of the company's operations, stakeholder consultation, consideration of legal and regulatory requirements, assessment of impacts, media analysis, and alignment with industry best practices. By undertaking this diligent process, we strive to foster constructive relationships, address concerns, and meet the expectations of its diverse range of stakeholders.

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

Key identified stakeholders	Whether identified as Vulnerable and marginalized group (Yes/No)		Frequency of engagement	Purpose and scope of engagement
Employees	No	HR interactions, Performance management, Townhalls, announcements	Continual	HR policies, Career progression, trainings
Shareholders/ Investors	No	Email, Annual General Meetings, Quarterly/Annual results, Website information, Official press release	Email, Annual General Regular/ Meetings, Quarterly/Annual Need based esults, Website information,	
Customers	No	Regular customer meetings, Business Visits, Sales visit, Customer satisfaction Survey	Frequent, Need based	Quality, timely Delivery, Order placements
Suppliers	No	Regular supplier meeting, Suppliers Assessments, Seminars, Conferences	Continual	Quality, Sustainability, Cost
Regulators	No	Compliance meetings, Industry associations, Events, Telephonic, Video conferences and email communication	Continual, Need based	Compliance, Policy advocacy
Community and NGOs	Yes	Community meetings	Frequent and Need based	CSR, Education, Welfare
Media	No	Press Conferences, Telephonic Continual, and email communication Need based		Outlook, announcements
Peers and Key Partners	No	Industry association, Events, and conferences	Need based	Knowledge sharing
Academics	No	Meetings, Visits, Academics related tours	Need based	Knowledge sharing, recruitments

#### 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.

Our goal is to expand our business while simultaneously prioritizing environmental protection and social well-being. We firmly believe that in order to create exceptional long-term value, we must demonstrate care for all our stakeholders: consumers, customers, employees, suppliers, media, shareholders, business partners, and above all, the planet and society. We call this philosophy as the multi-stakeholder model of sustainable growth.

In order to further shape our strategy for engaging with stakeholders, we have implemented a Stakeholder Engagement Policy. The effective implementation of the policy has further enhanced our stakeholder consultation and communication process.

Engaging with stakeholders is an ongoing process that is actively led by the organization's leadership. The company has also constituted a 'Stakeholder Relationship Committee' with an objective to assist the Board with oversight of, inter-alia, the effective and efficient servicing and protecting the stakeholders' interest including but not limited to shareholders, debenture holders, other security holders and rating agencies, regulators, customers.

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

Yes, the Company actively collaborates with various stakeholders to ensure that the expectations of each group are acknowledged and addressed to identify the material ESG topics. Tailored questionnaires as a part of AEL's materiality assessment was created for different stakeholder categories to identify specific areas of ESG concerns or ongoing focus that stakeholders desire. The findings from the materiality survey are utilized to identify material topics that hold the highest priority for stakeholders and have a substantial estimated impact on Adani's business.

Based on the materiality assessment results and the identified ESG priorities, short, medium and long term ESG Goals and Targets have been set for AEL.

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

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 develop their skills towards leadership and economic enhancement. Various CSR initiatives undertaken be it for farmers, women, students, unemployed youth, etc.

The initiatives are undertaken by the Company under the thrust areas of Corporate Social Responsibility initiatives after assessing the need of the communities including the vulnerable/marginalized stakeholder groups and other members of the community.

For further details, please refer: https://www.adanifoundation.org/

#### Principle 5: Businesses should respect and promote human rights

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

Category		FY 2022-23			FY 2021-22	
	Total (A)	No. employees / workers covered (B)	% (B / A)	Total (C)	No. employees / workers covered (D)	% (D/C)
Employees						
Male	5,731	4,111	71.73%	4,261	1,710	40.13%
Female	274	225	82.12%	247	155	62.75%
Total	6,005	4,336	72.21%	4,508	1,865	41.37%
Workers						
Male	916	910	99.34%	790	336	42.53%
Female	15,715	7,557	48.09%			
Total	16,631	8,467	50.91%	790	336	42.53%

Note: Our approach to human rights is guided by our Group's policy on Human Rights which is aligned to relevant national and international standards/protocols. The corporate ESG Team at AEL conducts regular trainings on Human Rights for the individual AEL businesses.

In line with our learning and development strategy, we also have an e-learning platform (eVidyalaya -Percipio) where different dimensions of ESG including Human Rights have been covered under different learning modules (POSH, Health & Safety, Working Conditions etc.). Additionally, as part of the onboarding process for new employees including contract manpower, we conduct an induction program which includes awareness on Human Rights as well.

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

Category	FY 2022-23					FY 2021-22					
	Total		al to m Wage	More Minimu		Total	Equa Minimu	al to m Wage		than m Wage	
	(A)	No. (B)	%(B/A)	No. (C)	%(C/A)	(D)	No. (E)	%(E/D)	No. (F)	%(F/D)	
Employees											
Permanent											
Male	5,222	0	0	5,222	100%	3,976	0	0	3,976	100%	
Female	509	0	0	509	100%	285	0	0	285	100%	
Other than Per	manent										
Male	214	0	0	214	100%	183	0	0	183	100%	
Female	60	0	0	60	100%	64	0	0	64	100%	
				Wc	rkers						
Permanent											
Male	836	0	0	836	100%	710	0	0	710	100%	
Female	80	0	0	80	100%	80	0	0	80	100%	
Other than Per	manent										
Male	14,004	0	0	14,004	100%	12,690	62	0.49%	12,628	99.51%	
Female	1,711	0	0	1,711	100%	1,431	0	0	1,431	100%	

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

Gender		Male	Female			
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category		
Board of Directors (BoD)	08	₹1.38 Crore¹	01	₹0.32 Crore 1		
Key Managerial Personnel	06*	₹5.05 Crore¹				
Employees other than BoD and KMP	1173	₹0.13 Crore	260	₹0.07 Crore		
Workers		Nil		Nil		

<sup>1.</sup> Excluding performance based variable incentive.

Note: The information in the table above is for AEL on a standalone basis.

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

Yes.

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

We are committed to providing a harmonious work environment that thrives on fairness, trust, mutual respect and is free from bias and discrimination. As a conglomerate operating across multiple businesses and locations, we have diverse talent in terms of age, skill sets, backgrounds and perspective. We understand that while working together we may sometimes encounter situations or scenarios that can take the shape of grievances / concerns. These concerns may pertain to working conditions, conflict at workplace, process/people issues, supervisor/peer relationships etc. Hence with an objective to enable our people to voice their concerns, a confidential, transparent, quick and robust online Grievances Management System named 'Speak-Up' has been launched. Speak-up is the latest initiative launched as a part of our integrated suite of support and well-being services under the ambit of Adani Cares.

<sup>\*</sup> includes Executive Chairman, Managing Director, two Executive Directors, Chief Financial Officer and Company Secretary.

This online Grievance Redressal Mechanism, that enablers our people to raise concerns and get them addressed in a time-bound manner. Speak-Up is a completely confidential platform through which our people can raise concerns / issues without fearing any negative repercussions.

'Speak-Up' will enable real-time reporting of grievances. Employees can raise a ticket online and the Grievances Redressal Committee (GRC) would undertake the responsibility of resolving the grievances within the defined timeline of 14 days. In case GRC is unable to resolve a grievance satisfactorily within the defined timelines, the Appellate Authority would get involved for further actions.

Stakeholders can also raise their concerns pertaining to human rights issues as per our Whistleblower Policy by directly reaching to the Grievance redressal team through dedicated email – whistleblower@adani.com.

#### 6. 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
Sexual Harassment	NIL	NIL	NIL	NIL	NIL	NIL
Discrimination at workplace	NIL	NIL	NIL	NIL	NIL	NIL
Child Labour	NIL	NIL	NIL	NIL	NIL	NIL
Forced Labour / Involuntary Labour	NIL	NIL	NIL	NIL	NIL	NIL
Wages	NIL	NIL	NIL	NIL	NIL	NIL
Other human rights related issues	NIL	NIL	NIL	NIL	NIL	NIL

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

The Company has implemented a policy on Prevention of Sexual Harassment (POSH), which includes a well-defined mechanism for addressing complaints related to sexual harassment. Internal Complaint Committees (ICCs) are responsible for handling such complaints, and they operate under strict confidentiality guidelines. This committee also have procedures in place to safeguard the complainant from any retaliatory actions.

Employees can also raise grievances through the internal online grievance portal. The system is designed to resolve grievances within a specified timeframe of 14 working days. All grievances are addressed in a fair and timely manner, with a strong emphasis on maintaining utmost confidentiality.

However, it is worth noting that no instances of harassment or discrimination were reported during the financial year 2022-23.

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

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

#### 9. Assessments for the year:

	% of value chain partners (by value of business done with such partners) that were assessed
Child labour	100%
Forced/involuntary labour	100%
Sexual harassment	100%
Discrimination at workplace	100%
Wages	100%
Others – please specify	NIL

We have established comprehensive systems to ensure compliance with regulatory obligations. This includes the implementation of a Code of Conduct for employees as well as a Suppliers, which outline our expectations regarding business ethics and adherence to human rights principles. During the vendor onboarding process, the online ARIBA portal is utilized to assess the human rights criteria.

Furthermore, we conduct regular reviews to ensure compliance with these requirements throughout the contract execution phase. In all our business units, it is mandatory to verify age proof documents during the recruitment process to prevent the employment of child labor. Additionally, our induction sessions cover essential topics related to business ethics and human rights to create awareness among employees.

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

No significant risks / concerns identified during assessments.

#### Leadership Indicators

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

Yes, at our corporate office, we have implemented specific provisions to cater to the needs of differently abled employees as well as visitors, in accordance with the Rights of Persons with Disabilities Act, 2016. We strongly advocate for equal opportunities for all individuals and recognize the significance of fostering a diverse and inclusive work environment. Our workplaces are designed to provide necessary assistance and support, including modifications to workstations or positions, to enable employees with disabilities to perform their job responsibilities.

To ensure accessibility, our corporate office is equipped with wheelchair ramps at entry points and in lobbies. We have dedicated restroom facilities for differently abled people. Our elevators are fitted with Braille signs, catering to the needs of individuals who are blind or visually impaired. We have also dedicated parking lots assigned for the differently abled employees and visitors. Additionally, our other locations also adhere to all relevant national and local requirements to cater the needs of differently abled individuals.

# Principle 6: Businesses should respect and make efforts to protect and restore the environment.

#### 1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format #

Parameter	Unit	FY 2022-23	FY 2021-22
Total electricity consumption (A)	GJ	10,34,946	8,22,344
Total fuel consumption (B)	GJ	23,58,588	15,71,670
**Energy consumption through other sources (C)	GJ	7,66,605	17,884
Total energy consumption (A+B+C)	GJ	41,60,139	24,11,898
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	GJ/Cr	229 (Turnover: 18,148.85 Cr)*	309
Energy intensity (optional) – the relevant metric may be selected by the entity	NA	NA	NA

<sup>#</sup> The energy consumption details mentioned above for the current financial year is for all the six operational businesses under scope, whereas the last financial year's information was limited for Natural Resources, Airports and Solar Manufacturing businesses.

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

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

<sup>\*</sup> For all the Intensity calculations, we have considered the annual turnover for only those businesses whose Environmental data has been used for reporting purposes.

<sup>\*\*</sup> The energy consumption through other sources includes heat, steam and energy from Renewable sources.

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.

#### 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 kilolitres)		
(i) Surface water	9,67,136	NIL
(ii) Groundwater	45,78,313	21,75,126
(iii) Third party water	17,54,943	5,88,881
(iv) Seawater / desalinated water	6,203	NIL
(v) Others	10,950	NIL
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	73,17,545	27,64,007
Total volume of water consumption (in kilolitres)	73,17,545	27,64,007
Water intensity per rupee of turnover (Water consumed, KL / turnover in Cr)	403	562
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA

#The water withdrawal details mentioned above for current financial year is for all the six operational businesses under scope, whereas the last financial year's information was limited for Natural Resources and Solar Manufacturing businesses.

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

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

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

We prioritize compliance with all relevant statutory obligations set by the Central and State Pollution Control Board to ensure responsible environmental practices. At our mining locations, we have implemented and consistently maintained robust systems to ensure compliance against ZLD norms. All the process water of washery is being recycled and reused within mining lease area for dust suppression, irrigation of greenbelt, haul road water sprinkling etc.

Also, at five of our Airports (Ahmedabad, Jaipur, Guwahati, Lucknow and Mangalore), we have implemented a mechanism for Zero Liquid Discharge. We have installed a sewage treatment plant (STP) for sewage treatment and the treated water is being used at Airports for the horticulture purpose.

At our other business locations, we have established a well-defined mechanism to treat sewage and effluent in accordance with statutory obligations. Following the treatment process, we endeavor to maximize the utilization of the treated water for internal purposes whenever feasible, promoting sustainable water management practices. By adhering to these measures, we strive to minimize our environmental impact and contribute to the preservation of natural resources.

#### 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		The air emission sources (stacks, chimneys etc.) are monitored on a defined					
Sox		frequency by an approved laboratory/agency as mandated by the Central and respective State Pollution Control Boards. The details of air emissions are submitted to PCB annually through the Annual Environment Statement within the stipulated timelines.					
Particulate matter (PM)							
Persistent organic pollutants (POP)							
Volatile organic compounds (VOC)							
Hazardous air pollutants (HAP)"							
Others – please specify							

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 1 emissions (Break- up of	Metric	7,87,145*	6,92,537
the GHG into CO2, CH4, N2O, HFCs,	tonnes of		
PFCs, SF6, NF3, if available)	CO2 equivalent		
Total Scope 2 emissions (Break- up of	Metric	1,67,163	2,14,762
the GHG into CO2, CH4, N2O, HFCs,	tonnes of		
PFCs, SF6, NF3, if available)	CO2 equivalent		
Total Scope 1 and Scope 2 emissions	MtCO2e/Cr	53	116
per rupee of turnover	of turnover		
Total Scope 1 and Scope 2 emission	NA	NA	NA
intensity (optional) – the relevant			
metric may be selected by the entity			

GHG emissions data mentioned above for Current Financial year is for all the six operational businesses under scope, whereas the last financial year's information was limited for Natural Resources, Airports and Solar Manufacturing operations only.

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

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

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

In line with Adani Group's target to meet India's Climate Change (NDC) commitments of emission reduction, the company has taken various initiatives such as:

- Implementation of 100% Green electricity at Mumbai Airport.
- 5% energy optimization plan has been taken under ISO 50001 considering per MW of module production at Adani Solar, Mundra location.
- Planning to introduce Hydrogen fuel cell-operated trucks to deploy in mining by FY 2023-24.
- Increased green cover across AEL businesses by planting more than 9 lakh trees to increase carbon sink.
- Initiated a pilot project for alternative fuel (Biodiesel) in the mining fleet operation.
- Proposed to install a solar power plant of 9 MW at our mine site (PEKB).
- Composite Pavement Construction is promoted wherein the emissions are considerably reduced by decreasing the asphalt pavement crust thereby conserving granite sources, bitumen and diesel.

<sup>\* 77%</sup> of our Total Scope - 1 emission is due to the fugitive emissions (methane) from our mining business. AEL is one of the few companies in the world to report on methane emissions from the mining operations.

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

Parameter	FY 2022-23	FY 2021-22
Total Waste generated (in metric tonnes)		
Plastic waste (A)	1,482	638
E-waste (B)	6	Nil
Bio-medical waste (C)	2	Nil
Construction and demolition waste (D)	27,942	Nil
Battery waste (E)	56	32
Radioactive waste (F)	0	NIL
Other Hazardous waste. Please specify, if any. (G)	144	107
Other Non-hazardous waste generated (H)	1,12,052	1,08,637
Total (A + B + C + D + E + F + G + H)	1,41,684	1,09,414
For each category of waste generated, total waste recovery operations (in metric tonnes)	covered timoogn recycling,	re-using or other
recovery operations (in metric tonnes)	covered timough recycling,	re-using or other
	9,516	1,00,059
recovery operations (in metric tonnes) Category of waste		
recovery operations (in metric tonnes)  Category of waste  (i) Recycled	9,516	1,00,059
recovery operations (in metric tonnes)  Category of waste  (i) Recycled  (ii) Re-used	9,516 1,05,632	1,00,059 91
recovery operations (in metric tonnes)  Category of waste  (i) Recycled  (ii) Re-used  (iii) Other recovery operations	9,516 1,05,632 1,437 <b>1,16,584</b>	1,00,059 91 NIL 1,00,151
recovery operations (in metric tonnes)  Category of waste  (i) Recycled  (ii) Re-used  (iii) Other recovery operations  Total  For each category of waste generated, total waste dis	9,516 1,05,632 1,437 <b>1,16,584</b>	1,00,059 91 NIL 1,00,151
recovery operations (in metric tonnes)  Category of waste  (i) Recycled  (ii) Re-used  (iii) Other recovery operations  Total  For each category of waste generated, total waste distonnes)	9,516 1,05,632 1,437 <b>1,16,584</b>	1,00,059 91 NIL 1,00,151
recovery operations (in metric tonnes)  Category of waste  (i) Recycled  (ii) Re-used  (iii) Other recovery operations  Total  For each category of waste generated, total waste distonnes)  Category of waste	9,516 1,05,632 1,437 <b>1,16,584</b> sposed by nature of dispos	1,00,059 91 NIL 1,00,151 al method (in metric
recovery operations (in metric tonnes)  Category of waste  (i) Recycled  (ii) Re-used  (iii) Other recovery operations  Total  For each category of waste generated, total waste distonnes)  Category of waste  (i) Incineration	9,516 1,05,632 1,437 <b>1,16,584</b> sposed by nature of dispos	1,00,059 91 NIL 1,00,151 al method (in metric

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

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

Our waste management is based on the cradle-to-cradle concept wherein the focus is on Refuse, Reduce, Reuse, Repurpose and Recycle the waste back into the system. It also comprises of five stages – Identification, Storage, Segregation, Recycling and Disposal. Our waste management system implies use of best-in-class waste management practices as it forms an integral part of our environmental management system. We also have a policy on Resource Conservation which has been effectively implemented at individual AEL husinesses.

For handling hazardous waste, we strictly adhere to applicable regulatory requirements and adopt best practices in the industry. This includes proper segregation, storage, and transportation of hazardous waste. In line with regulations, we ensure that hazardous waste is disposed of in an environmentally responsible manner through authorized vendors who specialize in recycling such waste.

All our businesses are actively working towards achieving Zero Waste to Landfill certification wherever it is viable. In addition to hazardous waste, various non-hazardous waste streams are significant, such as overburden from mining sites, scrap metal, wood waste, glass, tires, e-waste, cardboard, and paper. The entire overburden is used within the mining lease areas for backfilling and ecosystem restoration. Our strategic objective is to minimize or eliminate waste generation and divert waste from disposal through the promotion of reuse and recycling whenever feasible. At Adani Solar, ETP Chemical sludge sold to other industry for the use as a raw material. Our Mumbai Airport has become 100% SUP free Airport certified by CII. Similarly, at Thiruvananthapuram International Airport, we have installed an advanced Bioenergy Plant wherein the Biogas generated from the process is converted into electricity using the 15 KVA Biogas Genset and the generated units is consumed for operating the Airport. The Biogas slurry generated from the process is used as manure for Horticultural purposes. Also, at Mumbai and Ahmedabad Airport, we have installed three Reverse Vending Machines (RVM) to urge passengers and airport staff to recycle plastic bottles. Each Reverse Vending Machine is capable of both accepting and compressing a whopping 450 bottles per hour. It compresses around 70% of the waste, which can then be transported to recycling plants without any hassle.

By implementing these waste management measures, we aim to minimize the environmental impact of our operations and contribute to the sustainable use of resources.

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

Sr. No.	Location of operations/ offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
Nati	ural Resources Business		
1	PEKB Mine, Surguja (CG)	Opencast Coal Mine	Yes
2	GP-III Mine, Raigarh (CG)	Opencast Coal Mine	Yes
3	Talabira-II & II Mine, Jharsuguda (Odisha)	Opencast Coal Mine	Yes
4	Suliyari Coal Mine, Singrauli (M.P.)	Opencast Coal Mine	Yes
5	Kurmitar Iron Ore, Sundergarh (Odisha)	Iron Ore Mine	Yes
Airp	ort Business		
1.	Guwahati Airport	Aviation	Yes

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
1)Proposed Expansion of Mangaluru International Airport (MIA) to enhance the Passenger Handling Capacity up to 22.5 MPPA & Cargo Handling Capacity up to 0.12 MTPA	Proposal No. SIA/KA/ INFRA2/404084/2022 & File No. F. No. SEIAA 13 CON 2023	Applied on 14 <sup>th</sup> Nov 2022	Yes	Yes	In process
2) Proposed Capacity Expansion of Sardar Vallabhbhai Patel International Airport (SVPIA) to Enhance the Passenger Handing Capacity to 40.33 MPPA & cargo handling capacity up to 1.0 MTPA.	EC No -EC22B029GJ165952 File No- SIA/ GJ/134807/2022	12 <sup>th</sup> Nov 2022	Yes	Yes	https://www.adani. com/-/media/Project/ AhmedabadAirport/ Downloads/Environment- Clearance/EC-AIAL_ SVPIA.pdf

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
3)Proposed Expansion of Chaudhary Charan Singh International Airport (CCSIA) Lucknow, to enhance the Passenger Handling Capacity up to 39 MPPA & Cargo Handling Capacity up to 0.25 MTPA	EC22B000UP138223	15 <sup>th</sup> Nov 2022	Yes	Yes	https://www.adani. com/-/media/Project/ LucknowAirport/ Home/Environment- Clearances/15122022 Proposed-Expansion-of- CCSIA.pdf

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.

	Specify the law / regulation/ guidelines which was not complied with	the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	
1.	Nil	Nil	Not Applicable	Not Applicable

#### Leadership Indicators

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

Parameter	FY 2022-23	FY 2021- 22
From Renewable Sources		
Total electricity consumption (A)	5,43,183	17,884
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	5,43,183	17,884
From Non-renewable sources		
Total electricity consumption (D)	10,26,617	8,22,344
Total fuel consumption (E)	23,58,588	15,71,670
Energy consumption through other sources (F)	2,31,751	0
Total energy consumed from Non-renewable sources (D+E+F)	36,16,956	23,94,014

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

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

2. 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	Metric tonnes of CO2 equivalent	75,56,516	
Total Scope 3 emissions per rupee of turnover	MtCO2e/Cr of turnover	416	
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			

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

Sr. No.	Initiative Undertaken	Details of the Initiative	Outcome of the Initiative
1	Consumption of Pond Ash at Adani Road business	Pond Ash from Thermal Power Plants are being used for road construction works thereby conserving soil and biodiversity and also diesel required for processing.	2.2 Mn MT Pond Ash consumed in NPRP & MRRP sites of Road business.
2	Adani to deploy Hydrogen powered trucks	Adani Enterprises is the first in Asia and among the first in the world to adopt hydrogen fuel cell operated trucks for mining. (https://www.adanienterprises.com/newsroom/media-releases/In-a-first-Adani-to-deploy-Hydrogen-Powered-Trucks)	Handling hydrogen as a fuel for commercial fleet not only prepones the advent of hydrogen technology for the mining and logistics sector in the country but will also enable other businesses to opt for long-term sustainable solutions transitioning fleets in ports, airports and in their industrial operations. It will also provide zero emission engines providing long range, rapid refueling and heavy payload capabilities.

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

All individual businesses under AEL have Emergency Preparedness and Disaster Management Plan in place. The plan includes the possible emergency scenarios, risks and required mitigation plan including the existing controls to handle any emergency situations. Periodic drills are conducted to check their effectiveness.

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

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

Sr. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/ National)
1	Gujarat Chamber of Commerce and Industry (GCCI)	State
2	Federation of Indian Chambers of Commerce and Industry (FICCI)	National
3	Federation of Indian Mineral	National
4	Federation of Indian Export Organizations (FIEO)	National
5	Confederation of Indian Industry (CII)	National
6	Chemicals and Petrochemicals Manufacturers Association	National
7	Indian Chamber of Commerce (ICC)	National
8	The Associated Chambers of Commerce of India	National

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

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

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

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

Name and brief details of project	SIA Notification No	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
NA	NA	NA	NA	NA	NA

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

Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In ₹)
NA	NA	NA	NA	NA	NA

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

In order to effectively address the community related grievances, a formal mechanism has been put in place. A grievance redressal register (GRR) has been kept with the CSR in-charge at the site. The community members are encouraged to reach out to the CSR person in-charge via any mechanism including in-person visit to CSR office, phone call or a written letter. In addition to this, grievance boxes have been placed at select prominent locations in the villages where anyone may drop his/her complaint/grievance. The same is reviewed periodically and the grievances are then duly entered into GRR. The Program Officers working under the guidance of the CSR Head also keep in constant connect with the key community stakeholders - any concerns may also be communicated to them on one-to-one basis.

Many times, the community representatives register the grievance with the local district administration and the latter then forwards it to the relevant business site. In such a case, the grievance is duly registered in the GRR.

Mechanism to operationalize the system is as follows:

- The person in custody of the grievance register makes an entry as soon as the grievance is received.
- The CSR in-charge at site regularly monitors the register and leads the efforts in order to find an amicable resolve.
- Any new grievances registered are scrutinized and prioritized by the site CSR Head and the important ones (those that are deemed genuinely important by the site CSR team) shall be promptly brought to the notice of site BU Head.
- Once the grievance is addressed adequately, the same shall be marked completed/closed in the GRR.

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

Parameter	FY 2022-23	FY 2021-22
Directly sourced from MSMEs/ small producers	35%	13%
Sourced directly from within the district and neighbouring districts	48%*	The Company shall start monitoring and reporting this data in future.

<sup>\*</sup> Note: The information in the table above is for AEL on a standalone basis.

#### Leadership Indicators

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

Sr. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Adani Vidya Mandir, Surguja (CG)	769	78%
2	Airport Institution, Guwahati (Assam)	142	28%
3	Assam Flood 2022	36,755	100%

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

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

Our Airport business, the B2C business of the Adani Enterprises, has implemented well-defined systems to receive and address consumer complaints and feedback. Consumers are provided with multiple channels to express their concerns and provide feedback, including email and an online portal on our website. Resolving these issues in a timely and efficient manner is a key priority for our business operations.

The business ensures that all users receive prompt acknowledgments within 24 hours of submitting their complaints or feedback. Furthermore, a standard procedure is followed to close grievances within a specified timeframe, ensuring that each matter reaches a conclusive resolution. This proactive approach has allowed the business to effectively address the concerns of their stakeholders and continuously enhance the consumer experience.

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

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

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

	Received during the year	Pending resolution at end of year	Remarks
Data privacy	NIL	NIL	NA
Advertising	NIL	NIL	NA
Cyber-security	NIL	NIL	NA
Delivery of essential services	NIL	NIL	NA
Restrictive Trade Practices	NIL	NIL	NA
Unfair Trade Practices	NIL	NIL	NA
Other	1,504*	0	

<sup>\*</sup> Note: The number of consumer complaints mentioned in above table pertains to Airport business which is the only B2C business of AEL.

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

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

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

Yes, we have a Cyber Security and Data Privacy policy in line with our commitment to establishing and improving cyber security preparedness and minimizing exposure to associated risks.

Weblink: https://www.adanienterprises.com/-/media/Project/Enterprises/Investors/corporate-governance/ Polices/Cyber-Security-and-Data-Privacy-Policy.pdf

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

None.

Awareness programs on Information Security are available to all employees and wherever applicable to third parties e.g., sub-contractors, consultants, vendors etc. and regular training is imparted to them.

#### Leadership Indicators

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

Please refer the below link:

https://www.adanienterprises.com/businesses

- 2. Provide the following information relating to data breaches:
  - a. Number of instances of data breaches along-with impact: Nil
  - b. Percentage of data breaches involving personally identifiable information of customers: Nil



Science Based Assurance in Quality, Safety & Sustainability.

Independent Limited Assurance Statement to Adani Enterprises Limited on their Business Responsibility & Sustainability Report (BRSR) - FY2022-23

To the Management of Adani Enterprises Ltd., Ahmedabad, India

#### Introduction

Intertek India Private Limited ("Intertek") was engaged by Adani Enterprises Limited ("AEL") to provide an independent limited assurance on its BRSR (Business Responsibility & Sustainability Report) for FY2022-23 ("the Report"). The scope of the Report comprises the reporting periods of FY2022-23. The Report is prepared by AEL based on SEBI's (Securities and Exchange Board of India) BRSR guidelines. The assurance was performed in accordance with the requirements of International Federation of Accountants (IFAC) International Standard on Assurance Engagement (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information.

#### Objective

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

#### Intended Users

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

#### Responsibilities

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

Intertek's responsibility, as agreed with the management of AEL, is to provide assurance and express an opinion on the data and assertions in the Report based on our verification following the assurance scope and criteria given below. Intertek does not accept or assume any responsibility for any

other purpose or to any other person or organization. This document represents Intertek's independent and balanced opinion on the content and accuracy of the information and data held within.

# Assurance Scope

The Assurance has been provided for selected sustainability performance disclosures presented by Adani in its Report. The assurance boundary included data and information for the operations of Mining Services of Adani Natural Resources (PEKB & GP-III Mines), Integrated Resource Management (IRM), Adani Airport Holdings Ltd. (Mumbai & Mangalore Airports), Mundra Solar PV Ltd. (Mundra), DataConneX (Chennai & Noida), RMRW (Cluster 1), Adani Defence and Aerospace, and Adani Enterprises Ltd. (Corporate Office) in accordance with SEBI's BRSR guidelines. Our scope of assurance included verification of data and information on selected disclosures reported as summarized in the table below

#### Section A: General Disclosures

- Total number of permanent and other than permanent employees
- Total number of permanent and other than permanent workers
- Total number of female employees and workers
- Total number of differently abled employees and workers (permanent and other than permanent)
- Turnover rate for permanent employees and permanent workers
- Corporate Social Responsibility (CSR) Details (Total Expenditure)
- Number of beneficiaries of CSR projects and % of beneficiaries from vulnerable and marginalized groups

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

 Number and % of employees covered under health insurance, accident insurance, maternity benefits, paternity benefits, and day care facilities.





Science Based Assurance in Quality, Safety & Sustainability.

- Number and % of workers covered under health insurance, accident insurance, maternity benefits, paternity benefits, and day care facilities
- No. of employees covered as a % of total employees under the benefits of Provident Funds (PF), Gratuity and Employee State Insurance (ESI)
- No. of workers covered as a % of total workers under the benefits of PF, Gratuity and ESI
- Return to work and retention rates of permanent employees and workers that took parental leave
- Performance and career development reviews of employees and workers.
- Safety data (fatalities, loss time injuries and recordable work-related injuries).
- % of plants and offices that were assessed for health and safety practice and working conditions
- % of value chain partners that were assessed for health and safety practices and working conditions
- Number of complaints made by employees and workers on working conditions and Health and Safety.
- Number and % of employees and workers covered under training on health and safety related measures and skill upgradation.

# Principle 5: Businesses should respect and promote human rights

- Number and % of employees and workers covered under training on human rights policy and issues
- Minimum wage paid to employees and workers
- % of plants assessed for child labour, forced labour, sexual harassment, discrimination at workplace and wages

# Principle 6: Businesses should respect and make efforts to protect and restore the environment

- Total electricity and fuel consumption by renewable and non-renewable sources
- Energy intensity
- Total water withdrawn and consumption
- Water discharge data by destination and treatment
- Water intensity

- Air emissions (other than Greenhouse Gases)
- Scope 1,2 and 3 emissions data and emission intensity (scope 1, 2 and 3)
- Hazardous and non-hazardous waste generation, utilization, and disposal data

#### Assurance Criteria

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

- International Standard Assurance ΩN Engagements (ISAE) 3000 (revised) for 'Assurance Engagements other than Audits or Reviews of Historical Financial Information'.
- Standard International on Assurance Engagements (ISAE) 3410 for 'Assurance Engagements on Greenhouse Gas Statement

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

#### Methodology

Intertek performed assurance work using risk-based approach to obtain the information, explanations and evidence that was considered necessary to provide a limited level of assurance. The assurance was conducted by desk reviews, visit to AEL, Airport and RMRW's Corporate offices & stakeholder interviews with regards to the reporting and supporting records for the fiscal year 2023 at Adani's corporate office in Ahmedabad. Our assurance task was planned and carried out during May 2023. The assessment included the following:

- Assessment of the Report that was prepared in accordance with the SEBI's BRSR guidelines.
- Review of processes and systems used to gather and consolidate data.
- Examined and reviewed documents, data and other information made available at corporate offices and digitally.





Science Based Assurance in Quality, Safety & Sustainability.

- Conducted physical interviews with key personnel responsible for data management.
- Assessment of appropriateness of various assumptions, estimations and thresholds used by AEL for data analysis.
- Review of BRSR disclosures on sample basis for the duration from 1st April 2022 to 31st March of 2023 for AEL was carried out onsite at Adani's corporate office.
- Appropriate documentary evidence was obtained to support our conclusions on the information and data reviewed and details would be provided in a separate management report.

#### Conclusions

Intertek reviewed selected BRSR disclosures provided by AEL in its Report. Based on the data and

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

# Intertek's Competence and Independence

Intertek is a global provider of assurance services with a presence in more than 100 countries employing approximately 43,500 people. The Intertek assurance team included Sustainability Assurance Professionals, who were not involved in the collection and collation of any data except for this assurance opinion. Intertek maintains complete impartiality towards any people interviewed.

For Intertek India Pvt. Ltd.

Sumit Chowdhury

Technical Manager-Sustainability Intertek Assuris 19th June 2023 Elizabeth Mielbrecht

Elizabeth Mielbrecht Project Director Intertek Assuris

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

