



Ports and
Logistics

Ref No: APSEZL/SECT/2025-26/37

May 30, 2025

BSE Limited

Floor 25, P J Towers,
Dalal Street,
Mumbai – 400 001
Scrip Code: 532921

National Stock Exchange of India Limited

Exchange Plaza,
Bandra Kurla Complex,
Bandra (E), Mumbai – 400 051
Scrip Code: ADANI PORTS

**Sub.: Business Responsibility and Sustainability Report for the financial year
2024-25**

Dear Sir/Madam,

Pursuant to Regulation 34 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), we are submitting herewith the Business Responsibility and Sustainability Report for the Financial Year 2024-25 which is being sent through electronic mode to the Members.

The Integrated Annual Report along with the Business Responsibility and Sustainability Report for the Financial Year 2024-25 is also uploaded on the Company's website and can be accessed at www.adaniports.com.

You are requested to take the same on your record.

Thanking you,

Yours faithfully,

For Adani Ports and Special Economic Zone Limited

**Kamlesh Bhagia
Company Secretary**

Encl.: As above

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

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Business Responsibility & Sustainability Report

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Listed Entity	L63090GJ1998PLC034182
2	Name of the Listed Entity	Adani Ports and Special Economic Zone Limited
3	Year of incorporation	1998
4	Registered office address	Adani Corporate House, Shantigram, Near Vaishno Devi Circle, S. G. Highway, Khodiyar, Ahmedabad-382421 Gujarat
5	Corporate address	Adani Corporate House, Shantigram, Near Vaishno Devi Circle, S. G. Highway, Khodiyar, Ahmedabad-382421 Gujarat
6	E-mail	investor.apsezl@adani.com
7	Telephone	079-25554444
8	Website	www.adaniports.com
9	Financial year for which reporting is being done	April 01, 2024 to March 31, 2025
10	Name of the Stock Exchange(s) where shares are listed	a) BSE Limited b) National Stock Exchange of India Limited
11	Paid-up Capital	Paid up equity capital – INR 432.03 crore Paid up preferential capital – INR 2.50 crore
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Rahul Agarwal Head – ESG & IR Email: Rahul.Agarwal5@adani.com Phone: 079 – 25558888
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements taken together).	The financial, environmental, social and governance disclosures made in this report are on a consolidated basis. Nearly 100% of APSEZ's Consolidated employee base and over 95% of APSEZ's Consolidated energy, water and emission footprint. It should be noted that we have restated the FY2023-24 disclosures at specific locations with notes, based on the revised boundary, to provide a like-for-like comparison on account of inclusion of new entities.
14	Name of assurance provider	TUV India Pvt Ltd
15	Type of assurance obtained	Reasonable Assurance, as defined by International Standards on Assurance Engagements (ISAE 3000)

II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Transport and storage	Services incidental to land, water & air transportation	100

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

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

III. Operations

18. Number of locations where plants and/or operations/offices of the entity are situated.

Location	Number of plants*	Number of offices	Total
National	50	1	51
International	4	1	5

*Including the under construction

19. Markets served by the entity:

i. Number of locations

Locations	Number
National (No. of States)	28 States and 8 Union Territories
International (No. of Countries)	4

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

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

iii. A brief on types of customers:

APSEZL primarily serves B2B customers handling cargo, from dry cargo, liquid cargo, crude to containers. APSEZL provides integrated services in the ports, logistics, port base services and SEZ segment. It has a diverse range of customers, including businesses in the industrial, manufacturing, servicing, and agricultural sectors as well as those in shipping, container handling, freight forwarding, oil and gas, and agricultural industries. These customers range from local companies to transnational corporations. Additionally, Adani also serves government entities, institutions, and individuals. Its subsidiary, Adani Logistics Limited (ALL), operates inland container depots, ALL is a diversified end-to-end logistics provider with expertise in handling varied customers across segments like Retail, Industrial, Container, Bulk, Break-Bulk, Liquids, Auto and Grain Handling. Another subsidiary, Adani Agri Logistics Limited (AALL), provides storage infrastructure (silos) build for agricultural produce by Agri-logistics and is certified with Food Safety Management systems (ISO 22000:2018).

IV. Employees

20. Details as at the end of Financial Year

i. Employees and workers (including differently abled):

Particulars	Total (A)	Male		Female	
		No. (B)	% (B/A)	No. (C)	% (C/A)
EMPLOYEES					
Permanent (D)	2,788	2,714	97	74	3
Other than Permanent (E)	94	90	96	4	4
Total Employees (D+E)	2,882	2,804	97	78	3
WORKERS					
Permanent (F)	330	329	100	1	0
Other than Permanent (G)	42,042	40,080	95	1,962	5
Total Workers (F+G)	42,372	40,409	95	1,963	5

Note: Other than permanent workers including third party contractors as well

ii. Differently abled Employees and workers:

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
DIFFERENTLY ABLED EMPLOYEES						
1	Permanent (D)	11	11	100	0	0
2	Other than Permanent (E)	1	1	100	0	0
3	Total differently abled employees (D + E)	12	12	100	0	0
DIFFERENTLY ABLED WORKERS						
4	Permanent (F)	0	0	0	0	0
5	Other than permanent (G)	0	0	0	0	0
6	Total differently abled workers (F + G)	0	0	0	0	0

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	10	1	10
Key Management Personnel	5	0	0

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

	FY 2024-2025			FY 2023-2024			FY 2022-2023		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	16	21	16	15	23	16	13	0	13
Permanent Workers	8	0	8	4	100	4	5	0	5

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

23. i. Names of holding / subsidiary / associate companies / joint ventures

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Adani Ports and Special Economic Zone Ltd.	Parent company	Parent	Yes
2	Adani Petronet (Dahej) Port Ltd.	Subsidiary	74%	Yes
3	Adani Harbour Services Ltd. ("AHSL")	Subsidiary	100%	Yes
4	Adani Hazira Port Ltd. ("AHPL")	Subsidiary	100%	Yes
5	Adani Murmugao Port Terminal Pvt. Ltd.	Subsidiary	100%	Yes
6	Adani Vizag Coal Terminal Pvt. Ltd.	Subsidiary	100%	Yes
7	Adani Kandla Bulk Terminal Pvt. Ltd.	Subsidiary	100%	Yes
8	Adani Vizhinjam Port Pvt. Ltd.	Subsidiary	100%	Yes
9	Shanti Sagar International Dredging Ltd. ("SSIDL")	Subsidiary	100%	Yes
10	The Dhamra Port Company Ltd. ("DPCL")	Subsidiary	100%	Yes

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11	Karnavati Aviation Pvt. Ltd.	Subsidiary	100%	Yes
12	Karaikal Port Pvt. Ltd.	Subsidiary	100%	Yes
13	Marine Infrastructure Developer Pvt Ltd.	Subsidiary	97%	Yes
14	Adani Kattupalli Port Ltd.	Subsidiary	100%	Yes
15	Mundra SEZ Textile and Apparel Park Pvt. Ltd.	Subsidiary	55.28%	Yes
16	Mundra International Airport Ltd.	Subsidiary	100%	Yes
17	Adani Warehousing Services Ltd.	Subsidiary	100%	Yes
18	Adani Hospitals Mundra Ltd.	Subsidiary	100%	Yes
19	Madurai Infrastructure Ltd.	Subsidiary	100%	Yes
20	HDC Bulk Terminal Ltd.	Subsidiary	100%	Yes
21	Adani Aviation Fuels Ltd. (Applied for strike off)	Subsidiary	100%	Yes
22	Adani Ports Technologies Pvt. Ltd. ("APTPL")	Subsidiary	100%	Yes
23	Tajpur Sagar Port Ltd.	Subsidiary	100%	Yes
24	Mundra Crude Oil Terminal Ltd.	Subsidiary	100%	Yes
25	Adani Tracks Management Services Ltd.	Subsidiary	100%	Yes
26	Adani Container Terminal Ltd.	Subsidiary	100%	Yes
27	Adani Gangavaram Port Ltd.	Subsidiary	100%	Yes
28	Adani Container Manufacturing Ltd.	Subsidiary	100%	Yes
29	Adani Bulk Terminals (Mundra) Ltd.	Subsidiary	100%	Yes
30	Dighi Port Ltd. ("DPL")	Subsidiary	100%	Yes
31	Aqua Desiting Pvt. Ltd. (Applied for strike off)	Subsidiary	100%	Yes
32	Adinath Polyfills Pvt. Ltd.	Subsidiary	100%	Yes
33	Gangavaram Port Services (India) Ltd.	Subsidiary	100%	Yes
34	Adani Krishnapatnam Port Ltd. ("AKPL")	Subsidiary	100%	Yes
35	Udanvat Leasing IFSC Ltd.	Subsidiary	100%	Yes
36	Adani Logistics Ltd. ("ALL")	Subsidiary	100%	Yes
37	Dholera Infrastructure Pvt. Ltd. (DIPL)	Subsidiary	49%	No
38	Mundra LPG Terminal Pvt. Ltd.	Subsidiary	48.97%	No
39	DPA Container and Clean Cargo Terminal Limited	Subsidiary	100%	Yes
40	Gopalpur Ports Limited	Subsidiary	95%	Yes
41	Abbot Point Operations Pty Ltd., Australia ("APOPL")	Subsidiary	100%	Yes
42	Anchor Port Holding Pte Ltd. (Formerly, Adani Mundra Port Holding Pte. Ltd.), Singapore ("APHPL")	Subsidiary	100%	Yes
43	Adani Bangladesh Ports Private Limited, Bangladesh	Subsidiary	100%	Yes
44	Adani International Ports Holdings Pte Ltd, Singapore ("AIPH")	Subsidiary	100%	Yes

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45	Ocean Sparkle Ltd. ("OSL")	Step-down subsidiary	98.52% (74.21% by TAHSL + 24.31% by Savi Jana)	Yes
46	Savi Jana Sea Foods Pvt. Ltd. ("Savi Jana")	Step-down subsidiary	100% (TAHSL)	Yes
47	Sea Sparkle Harbour Services Ltd.	Step-down subsidiary	100% (OSL)	Yes
48	Sparkle Port Services Ltd.	Step-down subsidiary	100% (OSL)	Yes
49	Sparkle Terminal & Towage Services Ltd.	Step-down subsidiary	100% (OSL)	Yes
50	Hazira Infrastructure Ltd.	Step-down subsidiary	100% (AHPL)	Yes
51	Poseidon Leasing IFSC Limited	Step-down subsidiary	100% (SSIDL)	Yes
52	Dhamra Infrastructure Ltd.	Step-down subsidiary	100% (DPCL)	Yes
53	Seabird Distriparks (Krishnapatnam) Ltd.	Step-down subsidiary	100% (AKPL)	Yes
54	Dholera Port and Special Economic Zone Ltd.	Step-down subsidiary	100% (DIPL)	Yes
55	Mundra Solar Technopark Pvt. Ltd.	Step-down subsidiary	38.95% of ALL	Yes
56	Adani Agri Logistics Ltd. ("AALL")	Step-down subsidiary	100% (ALL)	Yes
57	Adani Agri Logistics (Samastipur) Ltd.	Step-down subsidiary	100% (ALL)	Yes
58	Adani Agri Logistics (Darbhanga) Ltd.	Step-down subsidiary	100% (ALL)	Yes
59	Blue Star Realtors Ltd.	Step-down subsidiary	100% (ALL)	Yes
60	Mandhata Build Estate Ltd. ("MBEL")	Step-down subsidiary	100% (ALL)	Yes
61	Nabhganga Enterprises Pvt. Ltd.	Step-down subsidiary	100% (MBEL)	Yes
62	Griptronics Enterprises Pvt. Ltd.	Step-down subsidiary	100% (MBEL)	Yes
63	Adrita Realtors Ltd.	Step-down subsidiary	100% (MBEL)	Yes
64	Agratas Projects Ltd.	Step-down subsidiary	100% (MBEL)	Yes
65	Dependencia Infrastructure Ltd.	Step-down subsidiary	100% (MBEL)	Yes
66	Adani Agri Logistics (Dahod) Ltd.	Step-down subsidiary	100% (MBEL)	Yes
67	Adani Warehousing Ltd.	Step-down subsidiary	100% (MBEL)	Yes
68	AY Builders Private Limited	Step-down subsidiary	100% (MBEL)	Yes
69	AY Buildwell Private Limited	Step-down subsidiary	100% (MBEL)	Yes
70	VMM Developers Private Limited	Step-down subsidiary	100% (MBEL)	Yes
71	YYA Realtors and Developers Private Limited	Step-down subsidiary	100% (MBEL)	Yes
72	AY Realtors and Developers Private Limited	Step-down subsidiary	100% (MBEL)	Yes
73	VAMI Realtech Private Limited	Step-down subsidiary	100% (MBEL)	Yes
74	YA Developers Private Limited	Step-down subsidiary	100% (MBEL)	Yes
75	Dermot Infracon Ltd.	Step-down subsidiary	100% (ALL)	Yes
76	Shankheshwar Buildwell Ltd.	Step-down subsidiary	100% (ALL)	Yes
77	Sulochana Pedestal Ltd. ("SPPL")	Step-down subsidiary	100% (ALL)	Yes
78	NRC Ltd.	Step-down subsidiary	100% (SPPL)	Yes
79	Adani Forwarding Agent Ltd.	Step-down subsidiary	100% (ALL)	Yes

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80	AYN Logistics Infra Pvt. Ltd.	Step-down subsidiary	100% (ALL)	Yes
81	Adani Logistics Services Ltd. ("ALSPL")	Step-down subsidiary	98.39% (ALL)	Yes
82	Adani Noble Ltd.	Step-down subsidiary	100% (ALSPL)	Yes
83	Adani Logistics Infrastructure Ltd.	Step-down subsidiary	100% (ALSPL)	Yes
84	Saptati Build Estate Ltd.	Step-down subsidiary	100% (AALL)	Yes
85	Adani Agri Logistics (MP) Ltd.	Step-down subsidiary	100% (AALL)	Yes
86	Adani Agri Logistics (Harda) Ltd.	Step-down subsidiary	100% (AALL)	Yes
87	Adani Agri Logistics (Hoshangabad) Ltd.	Step-down subsidiary	100% (AALL)	Yes
88	Adani Agri Logistics (Satna) Ltd.	Step-down subsidiary	100% (AALL)	Yes
89	Adani Agri Logistics (Ujjain) Ltd.	Step-down subsidiary	100% (AALL)	Yes
90	Adani Agri Logistics (Dewas) Ltd.	Step-down subsidiary	100% (AALL)	Yes
91	Adani Agri Logistics (Panipat) Ltd.	Step-down subsidiary	100% (AALL)	Yes
92	Adani Agri Logistics (Katihar) Ltd.	Step-down subsidiary	100% (AALL)	Yes
93	Adani Agri Logistics (Kotkapura) Ltd.	Step-down subsidiary	100% (AALL)	Yes
94	Adani Agri Logistics (Kannauj) Ltd.	Step-down subsidiary	100% (AALL)	Yes
95	Adani Agri Logistics (Barnala) Ltd.	Step-down subsidiary	100% (AALL)	Yes
96	Adani Agri Logistics (Moga) Ltd.	Step-down subsidiary	100% (AALL)	Yes
97	Adani Agri Logistics (Mansa) Ltd.	Step-down subsidiary	100% (AALL)	Yes
98	Adani Agri Logistics (Nakodar) Ltd.	Step-down subsidiary	100% (AALL)	Yes
99	Adani Agri Logistics (Raman) Ltd.	Step-down subsidiary	100% (AALL)	Yes
100	Adani Agri Logistics (Dhamora) Ltd.	Step-down subsidiary	100% (AALL)	Yes
101	Adani Agri Logistics (Sandila) Ltd.	Step-down subsidiary	100% (AALL)	Yes
102	Adani Agri Logistics (Gonda) Ltd.	Step-down subsidiary	100% (AALL)	Yes
103	Adani Agri Logistics (Chandari) Ltd.	Step-down subsidiary	100% (AALL)	Yes
104	Adani Agri Logistics (Katihar Two) Ltd.	Step-down subsidiary	100% (AALL)	Yes
105	PU Agri Logistics Ltd.	Step-down subsidiary	100% (AALL)	Yes
106	BU Agri Logistics Ltd.	Step-down subsidiary	100% (AALL)	Yes
107	HM Agri Logistics Ltd.	Step-down subsidiary	100% (AALL)	Yes
108	Kliptek Projects Pvt. Ltd.	Step-down subsidiary	100% (AALL)	Yes
109	Nihita Green Energy Pvt. Ltd.	Step-down subsidiary	100% (AALL)	Yes
110	Vidip Realtors Pvt. Ltd.	Step-down subsidiary	100% (AALL)	Yes
111	Sarwa Projects Pvt. Ltd.	Step-down subsidiary	100% (AALL)	Yes
112	Seed Biocoat Pvt. Ltd.	Step-down subsidiary	100% (AALL)	Yes
113	RG Data Center Private Limited	Step-down subsidiary	100% (AALL)	Yes
114	West Peak Data Center Private Limited	Step-down subsidiary	100% (AALL)	Yes
115	Infradigest Developers Private Limited	Step-down subsidiary	100% (AALL)	Yes
116	Beamx Infra Private Limited	Step-down subsidiary	100% (AALL)	Yes

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117	Pillstrong Infra Private Limited	Step-down subsidiary	100% (AALL)	Yes
118	Abbot Point Bulkcoal Pty Ltd., Australia	Step-down subsidiary	100% (APOPL)	Yes
119	Noble Port Pte Ltd., Singapore (Formerly, Adani Abbot Port Pte Ltd., Singapore)	Step-down subsidiary	100% (APHPL)	Yes
120	Pearl Port Pte Ltd., Singapore (Formerly, Adani Mundra Port Pte Ltd., Singapore)	Step-down subsidiary	100% (APHPL)	Yes
121	Colombo West International Terminal (Private) Ltd., Srilanka	Step-down subsidiary	51% (AIPH)	Yes
122	Sparkle Overseas Pte Ltd. ("SOPL")	Step-down subsidiary	100% (OSL)	Yes
123	The Adani Harbour International DMCC, UAE ("TAHID")	Step-down subsidiary	100% (TAHSL)	Yes
124	Omni Marine Solutions	Step-down subsidiary	100% (TAHID)	Yes
125	Port Harbour Services International Pte. Ltd, Singapore	Step-down subsidiary	100% (TAHSL)	Yes
126	East Africa Gateway Limited ("East Africa")	Step-down subsidiary	30% (AIPH)	Yes
127	Tanzania East Africa Gateway Terminal Limited	Step-down subsidiary	95% (East Africa)	Yes
128	Sunrise Worldwide Enterprise Limited ("SWEL")	Step-down subsidiary	80% (TAHID)	Yes
129	Astro Offshore Pte. Ltd ("AOPL")	Step-down subsidiary	100% (SWEL)	Yes
130	Astro Capella S.A.	Step-down subsidiary	100% (AOPL)	Yes
131	Astro Offshore Ships Management and Maintenance	Step-down subsidiary	49% (AOPL)	Yes
132	AOP Marine Agency Services LLC	Step-down subsidiary	100% (AOPL)	Yes
133	Astro Middle East Ship Management DMCC	Step-down subsidiary	100% (AOPL)	Yes
134	Astro Worldwide Investment Ltd ("AWIL")	Step-down subsidiary	100% (SWEL)	Yes
135	B300 PTE. LTD.	Step-down subsidiary	100% (AWIL)	Yes
136	B301 PTE. LTD.	Step-down subsidiary	100% (AWIL)	Yes
137	B311 PTE. LTD.	Step-down subsidiary	100% (AWIL)	Yes
138	B312 PTE. LTD.	Step-down subsidiary	100% (AWIL)	Yes
139	B313 PTE. LTD.	Step-down subsidiary	100% (AWIL)	Yes
140	B314 PTE. LTD.	Step-down subsidiary	100% (AWIL)	Yes
141	B3311 PTE. LTD.	Step-down subsidiary	100% (AWIL)	Yes
142	B511 PTE. LTD	Step-down subsidiary	100% (AWIL)	Yes
143	B3312 PTE LTD	Step-down subsidiary	100% (AWIL)	Yes
144	B411 PTE LTD.	Step-down subsidiary	100% (AWIL)	Yes
145	TP01 PTE LTD	Step-down subsidiary	100% (AWIL)	Yes
146	TP02 PTE LTD	Step-down subsidiary	100% (AWIL)	Yes
147	TP03 PTE. LTD	Step-down subsidiary	100% (AWIL)	Yes
148	TP04 PTE. LTD	Step-down subsidiary	100% (AWIL)	Yes
149	TP05 PTE. LTD	Step-down subsidiary	100% (AWIL)	Yes

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150	TP06 PTE.LTD	Step-down subsidiary	100% (AWIL)	Yes
151	TP07 PTE. LTD	Step-down subsidiary	100% (AWIL)	Yes
152	TP08 PTE. LTD	Step-down subsidiary	100% (AWIL)	Yes
153	TP09 PTE. LTD	Step-down subsidiary	100% (AWIL)	Yes
154	TP10 PTE.LTD	Step-down subsidiary	100% (AWIL)	Yes
155	TP11 PTE LTD	Step-down subsidiary	100% (AWIL)	Yes
156	TP12 PTE LTD	Step-down subsidiary	100% (AWIL)	Yes
157	TP13 PTE LTD	Step-down subsidiary	100% (AWIL)	Yes
158	TP14 PTE LTD	Step-down subsidiary	100% (AWIL)	Yes
159	Astro Offshore Ship Management Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
160	B315 Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
161	TP15 Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
162	TP17 Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
163	TP18 Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
164	TP19 Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
165	TP20 Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
166	TP21 Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
167	TP23 Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
168	TP24 Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
169	TP25 Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
170	TP26 Pte. Ltd.	Step-down subsidiary	100% (AWIL)	Yes
171	Adani International Container Terminal Pvt. Ltd.	Joint Venture	50% (APSEZL)	No
172	Adani CMA Mundra Terminal Pvt. Ltd.	Joint Venture	50% (APSEZL)	No
173	Adani Ennore Container Terminal Pvt. Ltd.	Joint Venture	51%	No
174	Adani Total Pvt. Ltd. (ATPL)	Joint Venture	50% (ALL)	No
175	Dhamra LNG Terminal Pvt. Ltd.	Joint Venture	100% (ATPL)	No
176	Veracity Supply Chain Ltd.	Joint Venture	50% (ALL)	No
177	IndianOil Adani Ventures Ltd. (IAVL)	Joint Venture	49.99%	No
178	IAV Utkarsh Ltd.	Joint Venture	100% (IAVL)	No
179	IAV Engineering Projects Ltd.	Joint Venture	100% (IAVL)	No
180	IAV Engineering & Construction Services Ltd.	Joint Venture	100% (IAVL)	No
181	IAV Infrastructures Pvt. Ltd.	Joint Venture	100% (IAVL)	No
182	IAV Biogas Pvt. Ltd.	Joint Venture	100% (IAVL)	No
183	IAV Urja Services Limited	Joint Venture	100% (IAVL)	No
184	IAV Udaan Limited	Joint Venture	100% (IAVL)	No
185	IOT Utkal Energy Services Ltd.	Joint Venture	71.57% (IAVL)	No
186	Zuari IAV Pvt. Ltd.	Joint Venture	50.00% (IAVL)	No

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187	KN IAV Pvt. Ltd.	Joint Venture	49.00% (IAVL)	No
188	Kazakhstan Caaspishelf India Pvt. Ltd.	Joint Venture	100% (IAVL)	No
189	Adani NYK Auto Logistics Solutions Pvt. Ltd.	Joint Venture	51% (ALL)	No
190	Adani KP Agriwarehousing Pvt. Ltd.	Joint Venture	74% (AKPL)	No
191	EZR Technologies Pvt. Ltd.	Joint Venture	51% (APTPL)	No
192	IOT Vito Muhendislik Insaat ve Taahhut AS, Turkey	Joint Venture	70.00% (IAVL)	No
193	Indian Oiltanking Engineering & Construction Services LLC, Oman	Joint Venture	70.00% (IAVL)	No
194	JSC Kazakhstancapishelf	Joint Venture	56.70% (IAVL)	No
195	Harbour Services Lanka (Pvt) Ltd	Joint Venture	30% (TAHID)	No
196	Mediterranean International Ports A.D.G.D Ltd, Israel (" Mediterranean ")	Joint Venture	70%	No
197	Haifa Port Company Ltd.	Joint Venture	100% (Mediterranean)	No
198	Khimji Sparkle Marine Services, SAOC	Joint Venture	49% (SOPL)	No
199	Al Annabi Marine Services	Joint Venture	49% (TAHSL)	No

VI. CSR Details

24. i. Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
- ii. Turnover (in ₹): 32,383.08 crore
- iii. Net worth (in ₹): 64,973.34 crore

VII. Transparency and Disclosure Compliances

25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom compliant is received	Grievance Redressal Mechanism	FY 2024-2025			FY 2023-2024		
		No. of complaints filled during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filled during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	Yes, a mechanism is in place to interact with community leaders to understand and address their concerns, if any	188	9	NA	0	0	NA
Investors (other than shareholders)	Yes https://scores.sebi.gov.in/	23	0	All complaints were disposed off	13	0	All complaints were disposed off

Stakeholder group from whom compliant is received	Grievance Redressal Mechanism	FY 2024-2025			FY 2023-2024		
		No. of complaints filled during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filled during the year	No. of complaints pending resolution at close of the year	Remarks
Shareholders	Yes	0	0	NA			NA
Employees and workers	Yes https://www.adaniports.com/Grievance	6	0	NA	0	0	NA
Customers	Yes	0	0	NA	0	0	NA
Value Chain Partners	Yes	0	0	NA	0	0	NA
Other (please specify)	Nil	0	0	NA	0	0	NA

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

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

S 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 positive or negative implications)
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Please refer to Unlocking lasting value by addressing key issues addressing very high material matters section in the of Integrated Report

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	
Policy and management processes										
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
c. Web Link of the Policies, if available										
Directors Familiarization Programme	✓			✓						
Code of Conduct	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Material Events Policy	✓			✓						
Nomination & Remuneration Policy	✓									
Supplier Code of Conduct		✓	✓	✓	✓	✓			✓	
Working Hours Guidelines	✓		✓							
Environmental Policy		✓				✓				
Code of Conduct Guidelines	✓	✓	✓	✓	✓	✓	✓	✓	✓	

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Cyber Security Policy				✓					✓
Diversity Equity & Inclusion Guidelines			✓		✓				
Anti-Bribery & Anti-Corruption Guidelines	✓						✓		
Human Rights Guidelines			✓	✓	✓				
Water Stewardship Policy		✓				✓			
Stakeholder Engagement Policy				✓					
Energy & Emission Policy		✓				✓			
Board Diversity Policy	✓								
Occupational Health & Safety Policy		✓	✓						
Sustainable Procurement Policy		✓	✓	✓	✓	✓			✓
Biodiversity Policy		✓				✓			
Policy on Prevention of Sexual Harassment			✓		✓				
Terms and conditions of appointment of Independent Directors	✓								
BRR Policies	✓								
Code of Fair Disclosure of UPSI	✓								
CSR Policy	✓								
Dividend Distribution & Shareholder Return Policy	✓								
Guidelines for Employment of Differently abled People			✓	✓	✓			✓	
Policy on Material Subsidiary	✓			✓					
Policy of Related Party Transactions for Acquiring and Sale of Assets	✓								
Policy on Preservation of Documents	✓						✓		
Website Content Archival Policy	✓								
Whistle Blower Policy	✓		✓	✓			✓		✓
Insider Trading Code	✓						✓		
Policy for Procedure of Inquiry in case of leak or suspected leak of UPSI	✓								
Related Party Transaction	✓								
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, APSEZ's Code of Conduct and Sustainable Procurement Policy and supplier code of conduct Guidelines cover key aspects of APSEZ's policies related to its value chain partners.								

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	
4. Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	ISO 14001: 2015	ISO 28000:2017	ISO 9001:2015	ISO 45001: 2018	ISO 50001:2018	IFC Performance Standard	GRI	UNGC	CEO Water Mandate	IBBI & IUCN
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>P3: Employees:</p> <ul style="list-style-type: none"> - Zero fatalities and Zero Incidents by 2025 - Employee Turnover: <4% Voluntary Attrition by 2025 - 5% women in the workforce by 2025 <p>P4: Stakeholder Engagement:</p> <ul style="list-style-type: none"> - Employee Satisfaction Rate of 4.5/5 by 2025 - Supplier Satisfaction Rate of 4.75/5 by 2025 - Customer Satisfaction Rate of 4.75/5 by 2025 <p>P6: Energy & Emission:</p> <ul style="list-style-type: none"> - Carbon neutrality by 2025, and net zero thereafter. - 50% Energy intensity reduction by 2025 - 60% Emission intensity reduction by 2025 - 100% RE share in total electricity by 2025 - 25% RE share in total energy by 2025 <p>P6: Water and Waste:</p> <ul style="list-style-type: none"> - 60% Water consumption intensity reduction - Zero waste to landfill 12 ports by 2025. - Zero Unauthorized Waste Disposal (ZUWD) - Zero Effluent Discharge (ZED) <p>P6: Afforestation</p> <ul style="list-style-type: none"> - 5000 Ha Mangrove afforestation by 2025 - 1200 Ha Terrestrial plantation by 2025 									

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.			<p>P3: Employees: Number of fatalities in FY 2024-25= 6 Number of LTI = 24 Voluntary attrition rate = 11% % of women workforce as of FY 2024-25= 4.5%</p> <p>P4: Stakeholder Engagement: Employee Satisfaction Rate in FY 2024-25= 4/5 (eNPS score 7.9/10) Supplier Satisfaction Rate in FY 2024-25= 4.2/5 Customer Satisfaction Rate in FY 2024-25= 4.3/5</p> <p>P6: Environment Energy & Emission: RE share in total electricity FY 2024-25 – Target :15% FY 2024-25 – Status :16%</p> <p>Energy intensity reduction FY 2024-25 – Target: 50% FY 2024-25 – Status: 53%</p> <p>Waste and Water: Zero waste to landfill FY 2024-25 – Target: 12 sites FY 2024-25 – Status :12 sites</p> <p>Water consumption intensity reduction FY 2024-25 – Target: 60% FY 2024-25 – Status:62%</p> <p>Afforestation Mangrove afforestation FY 2024-25 – Target: 4240 Ha. FY 2024-25 – Status: 4240 Ha.</p>						
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)									Refer the CEO statement in integrated report

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).

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

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

9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.

The Board of Adani Ports and Special Economic Zone Limited has established several Board committees. These committees are responsible for overseeing and managing key sustainability-related policies of APSEZ, as outlined below:

Audit Committee: Ensures the integrity of financial statements and compliance with legal and regulatory requirements and internal controls.

Nomination and Remuneration Committee: Oversees Board and executive appointments and their compensation, fostering leadership and fairness.

Stakeholders' Relationship Committee: Manages and nurtures the relationships with various stakeholders, ensuring their concerns are addressed.

Corporate Responsibility Committee: Drives sustainable practices and ESG targets and goals.

Corporate Social Responsibility Committee: Drives ethical business practices and community engagement initiatives, reflecting our commitment to social responsibility.

Information Technology & Data Security Committee: Safeguards digital assets, ensuring the security and integrity of data and IT systems.

Risk Management Committee: Identifies, evaluates, and mitigates risks, ensuring robust risk management practices.

Merger & Acquisitions Committee: Guides strategic mergers, acquisitions, and partnerships, fostering growth and expansion.

Legal, Regulatory & Tax Committee: Manages legal, regulatory, and tax affairs, ensuring compliance and mitigating legal risks.

10. Details of Review of NGRBCs by the Company:

	was by Director / Committee of e									Frequency (Annually/ Half yearly/ Quarterly/ Any other - pls specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Y	Y	Y	Y	Y	Y	Y	Y	Y	The performance against the policies of the Company is reviewed on a quarterly basis by department heads / director / board committees / board members, wherever applicable.								
Compliance with statutory requirements of relevance to the principles and, rectification of any non-compliances.	Y	Y	Y	Y	Y	Y	Y	Y	Y	Status of compliance with all applicable statutory requirements are reviewed by the Board on a quarterly basis.								

11. Has the entity carried out independent assessment / evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.

Yes, TUV India Pvt Ltd.

APSEZ has also achieved certification under several national and international standards, such as ISO 14001:2015 and ISO 45001:2018/OHSAS 18001. These certifications involve independent external assessors evaluating the company's policies. Section B of this report provides a summary of the certifications received by APSEZ.

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as “Essential” and “Leadership”. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	4	<ol style="list-style-type: none"> 1. Digital initiatives & Digital Dividend 2. FY 25 Performance (Financials, ESG, Credit) 3. Cyber Security landscape 4. Adani Foundation 5. ESG & Climate Solutions: a force multiplier for India 6. Business immersion 7. Risk Management Framework, Audit & Assurance 8. Consumer Centricity (B2C businesses) 9. Adani – Leading with purpose and Branding and Digital dexterity. 	90
Key Managerial Personnel	13	Environment Management System; ESG, Health, Regulatory, Safety, Wealth awareness program; Value Chain Creation, Transformation Mind-set, Customer Centricity; Stakeholder partnering, Anti Bribery and Anti-Corruption (ABAC) Policy at Adani Group, Wealth awareness program	60
Employees other than BoD and KMPs	113	APSEZ conducts multiple remote and classroom sessions throughout the year on key topics such as Environment Management System, ESG, Health, Regulatory, Safety, Wealth awareness program; Value Chain Creation, Transformation Mind-set, Customer Centricity; Stakeholder partnering, Anti-Bribery and Anti-Corruption (ABAC) Policy at Adani Group, Wealth awareness program, policies, Conflict of Interest, Prevention of Sexual Harassment policies, etc., for employees and workers across managerial and non-managerial levels. These training sessions are mandatory for all employees.	100
Workers	314	APSEZ conducts multiple remote and classroom sessions throughout the year on key topics such as Environment Management System, ESG, Health, Regulatory, Safety, Wealth awareness program; Value Chain Creation, Transformation Mind-set, Customer Centricity; Stakeholder partnering, Anti-Bribery and Anti-Corruption (ABAC) Policy at Adani Group, Wealth awareness program, policies, Conflict of Interest, Prevention of Sexual Harassment policies, etc., for employees and workers across managerial and non-managerial levels. These training sessions are mandatory for all employees.	100

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	Nil	Nil	Nil	Nil	NA
Settlement	Nil	Nil	Nil	Nil	NA
Compounding fee	Nil	Nil	Nil	Nil	NA
Non-Monetary					
Imprisonment	Nil	Nil	Nil	Nil	NA
Punishment	Nil	Nil	Nil	Nil	NA

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

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

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

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

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

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

	FY 2024-25	FY 2023-24
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	Nil	0	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	Nil	0	Nil

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

Not Applicable

8. Number of days of accounts payables ((Accounts payable *365) / Cost of goods/services procured) in the following format:

	FY 2024-25	FY 2023-24
Number of days of accounts payables	82	73

9. Open-ness of business: Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

Parameter	Metrics	FY 2024-25	FY 2023-24
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	0	0
	b. Number of trading houses where purchases are made from	0	0
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0	0
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	0	0
	b. Number of dealers / distributors to whom sales are made	0	0
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	0	0
Share of RPTs	a. Purchases (Purchases with related parties / Total Purchases)	11.3%	6.73%
	b. Sales (Sales to related parties / Total Sales)	16.43%	14.94%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	28.84%	6.1%
	d. Investments(Investments in related parties / Total Investments made)	72.19%	69.59%

Note 1: Trading house considered as per the following A "trading house" is a specialized legal entity primarily engaged in the business of export, import, and/or domestic trade of goods and services, facilitating such import, export and/or domestic trade and providing related services to support these transactions. but, does not include related parties. There are no purchases from Trading houses in FY 2024-25.

Note 2: For loans and advances and Investments, closing balances disclosed in the Audited consolidated Financial statements for the year ended March 31, 2025 have been considered.

Note 3: FY 2023-24 figures have been revised as per the Industry standards note on BRSR Core

Leadership Indicators

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
5	1. ESG introduction 2. Supplier code of conduct 3. Human Rights 4. Sustainable procurement policy 5. Best available technology sharing	67

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

Yes, APSEZL has a Code of Conduct which is applicable to all the members of the Board of Directors and all the members of the Company. The code details the expectations regarding Conflict of Interest involving members of the Board. The Code is available at: <https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Code-of-Conduct.pdf>. The members of the board and Senior management should affirm their compliance with the code on an annual basis. The annual compliance report is forwarded to the Company Secretary. As per the Code of Conduct, Directors and members of Senior Management of APSEZL should avoid conflicts of interest with the Company. Any situation that involves, or may reasonably be expected to involve, a conflict of interest with the Company shall be disclosed promptly to the Company Secretary of the Company.

The Company receives an annual declaration from its Board of Directors and all employees confirming adherence to the Code of Conduct, which includes the provisions on dealing with conflict of interest.

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

Essential Indicators

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

	FY 2024-25	FY 2023-24	Details of improvements in environmental and social impacts
R&D*	0	0	Not Applicable
Capex	0	0	Not Applicable

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

2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)

Yes, APSEZL believes that the development of its suppliers is imperative for our business growth. Therefore, the Company is committed towards the suppliers to inculcate APSEZL's Sustainable Procurement policy that focuses on - reduced use of toxic substances, conservation of natural resources, minimization of waste generation and release of pollutants/emissions, maximizing reusability and recyclability across the value chain.

The Company has systems, policies, and procedures in place for sustainable sourcing. We are guided by our Sustainable Procurement Policies (sustainable procurement policy: <https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Sustainable-Procurement-Policy.pdf> & supplier code of conduct: <https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Supplier-Code-of-Conduct.pdf>) which covers sustainable sourcing requirement related to development of systems & process, products, and services (including office products). Additionally, APSEZL has established key performance indicators (KPIs) and targets for supply chain management sustainability that apply to Tier 1 suppliers. These suppliers are deemed highly dependent, as they are the direct vendors with whom the Company engages in large volume transactions.

Our system records and verifies all suppliers' Environment, Social, and Governance (ESG) parameters, and we provide them with the necessary knowledge to improve their ESG metrics.

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

In FY 2024-25, All suppliers of APSEZL must declare their commitments to APSEZ's sustainability expectations during registration and sign off work orders. 100% of APSEZ's inputs are sourced from suppliers who commit to its guiding principles by providing declarations during the vendor onboarding /registration phase.

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

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

Plastic Waste: As per the statutory guidelines, for obtaining Environmental Clearance (EC) from MoEF&CC, we are required to have Single Use Plastic (SUP) free ports. Accordingly, all our operating ports are SUP free. Other than SUP, plastic waste is being disposed to authorized vendors for reuse and recycle appropriately.

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

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

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

- i. We have implemented a sustainable waste management practice by recycling bio-degradable waste and using it as manure.
- ii. Non-biodegradable waste such as paper, plastic, and scrap is sent to recyclers.
- iii. Non-recyclable and non-recoverable dry waste (loose refused derived fuel) was sent to cement plants for co-processing.
- iv. STP sludge was used as a soil conditioner/manure.
- v. Under the International Maritime Organization's MARPOL 73/78 convention, vessels that call at our port deliver their waste safely to our facility at a nominal charge, in alignment with the 'polluter pays' principle'.
- vi. We continuously impart training to our employees on responsible waste disposal practices to ensure that they are aware of their roles in implementing sustainable waste management practices. In addition, we work with our customers to manage their waste through appropriate channels.

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

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

Leadership Indicators

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

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

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

Name of Product / Service	Description of the risk / concern	Action Taken
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APSEZ has not conducted LCA for its services.

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2024-25	FY 2023-24
Waste generated during operations	4%	5%

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

	FY 2024-25			FY 2023-24		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)			NA			NA
E-waste						
Hazardous waste						
Other waste						

The Company does not have any specific product to reclaim at the end of life, However, at the project and operation sites, there are systems in place to recycle, reuse and dispose in line with regulatory requirements for the above waste being generated during course of construction and operation.

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

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

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

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	2,714	2,714	100	2,714	100	NA	NA	2,714	100	0	0
Female	74	74	100	74	100	74	100	NA	NA	0	0
Total	2,788	2,788	100	2,788	100	74	3	2,714	97	0	0
Other than Permanent employees											
Male	90	90	100	90	100	NA	NA	90	100	0	0
Female	4	4	100	4	100	4	100	NA	NA	0	0
Total	94	94	100	94	100	4	100	90	100	0	0

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	329	329	100	329	100	NA	NA	329	100	0	0
Female	1	1	100	1	100	1	100	NA	NA	0	0
Total	330	330	100	330	100	1	100	350	100	0	0
Other than Permanent workers											
Male	40,080	40,080	100	40,080	100	NA	NA	40,080	100	0	0
Female	1,962	1,962	100	1,962	100	1,962	100	NA	NA	0	0
Total	42,042	43	100	43	100	0	100	43	100	0	0

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format –

	FY 2024-25	FY 2023-24
Cost incurred on well-being measures as a % of total revenue of the company	0.29%	0.28%*

*Revised as per latest BRSR guidance

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

Benefits	FY 2024-25			FY 2023-24		
	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.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	100	Y	100	100	Y
Gratuity	100	100	Y	100	100	Y
ESI	100	100	Y	100	100	Y
Others – please specify	NA	NA	NA	NA	NA	NA

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

Yes, APSEZL is committed to delivering value through equality to nurture and promote human diversity across its operations. At our corporate office, we have made special provisions for differently abled employees and workers in accordance with the Rights of Persons with Disabilities Act, 2016. We strongly promote equal opportunities for everyone and acknowledge the importance of having a diverse and equitable work environment. We have designed workplaces to enable employees with disabilities to carry out their jobs. Our Corporate office has ramps at entry locations and lobbies to facilitate wheelchairs. We have dedicated toilets for differently abled employees. We have elevators with Braille signs, designed for blind people or visually impaired people. Our other locations also comply with all the national/local requirements to accommodate differently abled person and their needs. All the Company's existing and new infrastructure has implemented a comprehensive plan to address the accessibility of workplaces for differently abled employees.

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

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

Yes. APSEZL is an equal opportunity employer and extends the right of equal opportunity for differently abled candidates. We promote an inclusive work culture of creating a supportive professional environment that promotes trust, empathy, and mutual respect. Our policy on Employment of Differently abled People and Diversity and Inclusion has been developed in line with our commitment.

Weblinks:

Diversity Equity & Inclusion guidelines:

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

Guidelines for Employment of Differently abled people:

<https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Employment-of-Differently-abled-People---Guidelines---APSEZ.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	88	100	100
Female	100	100	0	0
Total	100	88	100	100

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes. Further details are provided below.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

Yes, we have implemented an online Grievance Redressal system called "Speak-Up," which is exclusively for its workforce (permanent employees, permanent workers and other than permanent) to raise any concerns they may have. The system allows them to bring their concerns to the attention of the Grievance Redressal Committee (GRC), which resolves these issues within 14 working days. The grievances are resolved in a fair and time bound manner maintaining utmost confidentiality. In addition, grievance registers and complaint boxes are available at sites/locations wherein grievances/complaints can be registered/ submitted. Workers that are engaged on a contract basis can also report their grievances to their respective contractor representative or the company supervisor. The contractor is expected to take the required action to address the worker grievances, and if required, can raise the grievance to HR and respective functional heads.

Apart from the on-line grievance redressal platform, the Company also has a policy on prevention, prohibition and redressal of sexual harassment of women at the workplace and has Internal Complaints Committees (ICCs) in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Members of the ICCs are responsible for conducting inquiries pertaining to such complaints.

The Company has also adopted a Whistle Blower Policy and has established the necessary vigil mechanism for employees to report concerns about unethical behavior and financial irregularities. The Company, on a regular basis, sensitizes its employees on the prevention of sexual harassment at the workplace through workshops, group meetings, online training modules and awareness programs.

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

Category	FY 2024-25			FY 2023-24		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. Of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	2,788	0	0	2,778	0	0
- Male	2,714	0	0	2,699	0	0
- Female	74	0	0	79	0	0
Total Permanent Workers	330	0	0	351	0	0
- Male	329	0	0	350	0	0
- Female	1	0	0	1	0	0

8. Details of training given to employees and workers:

Category	FY 2024-25					FY 2023-24				
	Current Financial Year					Previous Financial Year				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No.(E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	2,804	2,695	96	2,626	94	2,835	2,835	100	2,528	89
Female	78	74	95	78	100	84	84	100	42	50
Total	2,882	2,769	96	2,704	94	2,919	2,919	100	2,570	88
Workers										
Male	40,409	17,786	44	7,941	20	393	393	100	355	90
Female	1,963	120	6	100	5	1	1	100	1	100
Total	42,372	17,906	42	8,041	19	394	394	100	356	90

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

Category	FY 2024-25			Category	FY 2023-24		
	Total No. (A)	No. reviewed (B)	% (B/A)		Total No. (A)	No. reviewed (B)	% (B/A)
Employees							
Male	2,804	2,804	100	Male	2,835	2,493	88
Female	78	78	100	Female	84	79	94
Total	2,882	2,882	100	Total	2,919	2,572	88
Workers							
Male	40,409	40,409	100	Male	393	363	92
Female	1,963	1,963	100	Female	1	1	100
Total	42,372	42,372	100	Total	394	364	92

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 of such a system?

Yes, The Company has adopted and implemented the Adani Group's Safety Management System framework which is built on International Safety Standards such as ISO 45001, by integrating all critical business activities and applying principles, processes in order to provide safe and healthy workplaces across all Company's establishments, prevent work related injury and ill health, minimize risks and continuously improve safety performance. All our ports are certified with ISO 45001: 2018 "Management System". It is applicable to the company's entire operations/ employees as well as contractors or individuals under the company's supervision.

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

Process: APSEZL has established and aligned globally recognized high level Safety Intervention and Risk Assessment programs such as Safety Interaction (SI), Vulnerability Safety Risks (VSR), Site Risk Field Audits (SRFA), Process Hazard Analysis (PHA), and Prestart up Safety Review (PSSR) with Business specific Integrated Management System based Hazard Identification and Risk Assessment Process (HIRA) and Job Safety Analysis (JSA). The Company has adopted this framework and the reporting businesses have

developed an ecosystem of participative and consultative approach for engaging concerned stakeholders, including employees, associates, and contract workforce. The Company recognizes that the dynamic risks need to be managed and mitigated as per the Hierarchy of Control to protect its stakeholders and achieve the objective of Zero Harm with enablement of Sustainable Growth. These interventions bring together an understanding of the potential upside and downside of all job and personal factors which can impact the organization with an objective to prevent injury, protect assets and add maximum sustainable value to all the activities and processes of the organization.

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

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

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

Yes, The Company uses the well-established Incident Management and Investigation System for fair and transparent reporting of work-related hazards and risks as unsafe acts/ unsafe conditions, near misses, injuries and illness and serious incidents. This is followed by a comprehensive Root Cause Failure Analysis (Investigation), formulation of corrective actions as per Hierarchy of Controls, its tracking and monitoring and subsequent closure. The outcome and learnings from these events and incidents are deployed horizontally across the Group through a systemic process of 'Critical Vulnerable Factor' (CVF) as a part of Safety Governance Process. The progress on CVF is reviewed during Adani Apex Group Safety Steering Council Meetings as well as during their Business Safety Council Meetings. To facilitate this, an advanced digital platform (GENSUITE) on OH&S Reporting has been deployed by APSEZL. The Company accesses this platform through its machines as well as native and lite Mobile App version. Moreover, each site has suggestion boxes where employees, workers and business partners can report grievances, and suggestions for improving the safety performance. Employees and workers can also report incidents and inaction on the safety incident through a formal whistle blower portal, the details of which are displayed at each site.

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

Yes, the employees and workers have access to non-occupational medical and healthcare services. We care for our employees and our business partners' health and well-being and provide them with well-equipped hospitals across locations. We have some of the best medical insurance and accident coverage policies to help employees deal with medical emergencies. Periodic health check-ups and awareness sessions for all employees are conducted regularly. Not only the physical well-being, but the mental well-being of our employees is also taken care of. We conduct several programs across locations to help employees deal with stress and maintain a healthy work-life balance. This includes medical check-ups, clinics, etc. at sites to promote healthy and fit employees. The Company ensures the presence of fully equipped emergency healthcare facilities at all its sites, prioritizing the well-being of employees and contractors. To monitor the health of individuals, comprehensive pre-employment and periodic medical assessments are conducted for all personnel.

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

Safety Incident/Number	Category*	FY 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.02	0.12
	Workers	0.26	0.28
Total recordable work-related injuries	Employees	2	1
	Workers	22	21
No. of fatalities	Employees	0	0
	Workers	6	6
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

The Health and Safety of our people is of the utmost importance to us. To achieve this, we have adopted a shared responsibility approach, with increased engagements at all levels of the workforce and strengthening the safety culture across all Company's businesses. We are taking steps to reduce reportable incidents, minimize injuries and regularly monitor the safety performance of our sites. Our occupational health and safety management system is also well aligned with Adani Safety Management System framework and covers all employees, contractors, business associates, visitors, and the community as well. In addition to that, all our sites are ISO 45001 (2018) certified. As a part of our strategy to prevent health and safety related incidents, we have identified two focus areas which are contractor safety management (CSM) and operational discipline. CSM procedure provides support in manpower deployment whereas the operational discipline ensures that proper measures to eliminate hazards are taken at all our sites. The safety intervention taken in FY 2024-25, are described in the committed to workers well being, health and safety section of integrated report FY 2024-25.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour/Involuntary Labour	0	0	NA	0	0	NA
Wages	3	0	NA	0	0	NA
Other human rights related issues	0	0	NA	0	0	NA

14. Assessments for the year: FY 2024-25

Health and safety practices	% 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.

All incidents are investigated thoroughly as per APSEZL Safety Guidelines on Incident Reporting & Investigation and learning is shared across sites to ensure non-occurrence of similar incidents. Also, employees and workers are encouraged to report the maximum number of unsafe acts and conditions to eliminate such incidents. Please refer to **Safety incident description and Actions taken to strengthen safety in the** committed to workers well being, health and safety section of integrated report FY 2024-25.

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).

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

(B) Workers: Yes

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

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

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

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25	FY 2023-24	FY 2024-25	FY 2023-24
Employees	0	0	0	0
Workers	6	6	0	0

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

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	67% of supply chain partners were assessed for health and safety in FY 2024-25
Working Conditions	67% of supply chain partners were assessed for working conditions in FY 2024-25

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

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

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

Essential Indicators

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

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

We proactively engage with our stakeholders on a regular basis. For long term ongoing projects, stakeholders are identified before initiation of the project, basis the geographical area of the project as well as through the baseline & need assessment that is conducted. For any new proposed project or expansion, we map and engage with all such stakeholders on a proactive basis, particularly through our CSR activities. Further, we have stakeholder management processes in place at all our locations.

Our stakeholder groups have been majorly classified as:

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

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

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders	No	Online survey, magazines, e-mails, intranet, reports, website, online grievance mechanism, one-to-one interactions, Town Hall meetings, brochures, HR communication, wellness initiatives and workshops	Quarterly, as, and when required	<ol style="list-style-type: none"> 1. Share price appreciation, dividends, profitability, and financial stability 2. Robust ESG practices, climate change risks, cyber risks 3. Growth prospects
Customers	No	Website, distributor/retailer/direct customer/achievers meet, senior leader customer meets/visits, helpdesk, conferences, joint BD plans, emails, customer surveys, reports, brochures, feedback mechanism, customer support cells	Quarterly, annually, as, and when required	<ol style="list-style-type: none"> 1. In surveys, customers (shipping lines) are asked to disclose their environment and health & safety management systems & certifications and targets on carbon reduction, waste management and water efficiency, human rights practices. 2. Service Quality 3. Responsiveness to needs

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Online survey, magazines, e-mails, intranet, reports, website, online grievance mechanism, one-to-one interactions, Town Hall meetings, brochures, HR communication, wellness initiatives and workshops	Continuous, weekly, monthly, quarterly, and annually	<ol style="list-style-type: none"> Career/performance discussion Training & Awareness Identify and report human rights issues, and the awareness of various means to report any abuse Operational efficiency Health, safety, and engagement initiatives
Suppliers	No	Prequalification/vetting, communication and partnership meets, plant visits, MoU and framework agreements, online survey, e-mails, ESG Assessment, vendor meet, online grievance mechanism, site visits, one-to-one interaction, reports, website and workshops	Monthly, quarterly, annually, as, and when required	<ol style="list-style-type: none"> Quality & sustainable supply Timely delivery and payments ESG consideration (sustainability, safety checks, compliances, human rights), ISO and OHSAS standards, Collaboration and digitalization opportunities
Community	No	Community visits and projects, partnership with local charities, volunteerism, seminars/ conferences, assessments & surveys, focused group discussions, one-to-one interactions, media, website, online grievance mechanism and field visits	Monthly, quarterly, annually, as, and when required	<ol style="list-style-type: none"> Identify and prioritize the interventions required by the communities. Impact assessments of various community development projects are performed by third parties for CSR interventions undertaken. Assessments for human rights CSR activities Awareness programmes
Regulatory authorities & rating agencies	No	Reports, website, online applications, presentation, one-to-one interaction, events, e-mails, letters, and meetings	Annually as, and when required	<ol style="list-style-type: none"> Regulatory & compliance requirements Support & Feedback on business performance Sustainability topics of concern

Leadership Indicators

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

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

To guide our approach to stakeholder engagement, we have established Stakeholder Engagement Policy available on our website. The appointment of respective stakeholder representatives enables this exercise to be conducted more efficiently as these representatives act as a channel to enable two-way engagement between the organization and stakeholders. There is continuous dialogue with the community stakeholders which is reviewed at Business Unit levels. Also, every two years through the thirdparty engagement, impact, baseline and need assessment, feedback from the stakeholders is taken. In addition to this through regular engagements at various platforms there is continuous dialogue with the stakeholders and the same is also presented to the Board. Public consultations are part of the new project and expansion plans, where feedback and views of the stakeholders is considered for project design.

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

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

Yes. Business partners are encouraged to share input and feedback during various stakeholder interactions within our business. Stakeholder consultation is used to support and strengthen the Company's initiatives. Financial planning, CSR outflows, program designing, etc. has been taken up as per the materiality assessment. We engage with selected stakeholders, identified on the principles of responsibility, influence, impact and dependency. Customized questionnaires for various stakeholder categories are developed to identify areas of concern or ongoing focus desired by stakeholders. This is to facilitate consultative processes to ensure full coverage of environmental, social and governance issues as well as the involvement of the personnel and management of APSEZL to address all stakeholder queries and grievances.

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

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

The Company identifies the disadvantaged, vulnerable and marginalized stakeholders on an on-going basis. Any new proposed project or expansion is mapped by engaging the stakeholder proactively, specifically via CSR activities. A comprehensive stakeholder management and grievance mechanism exists at all our locations. Company engages with the disadvantaged, vulnerable and marginalized stakeholders through various CSR programs with an aim to empower women and make them financially independent and also develop their skills towards leadership and economic enhancement. Various CSR initiatives undertaken for farmers, women, students, unemployed youth, etc. Please refer to the CSR section of our Annual Integrated Report FY 2024-25.

PRINCIPLE 5: Businesses should respect and promote human rights.**Essential Indicators**

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
Employees						
Permanent	2,788	2,468	89	2,778	2,213	80
Other than permanent	94	0	0	141	0	0
Total Employees	2,882	2,468	86	2,919	2,213	76
Workers						
Permanent	330	0	0	351	66	19
Other than permanent	42,042	1,279	3	43	0	0
Total Workers	42,372	1,279	3	394	66	17

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

Category	FY 2024-25					FY 2023-24				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	2,788	0	0	2,788	100	2,778	0	0	2,778	100
Male	2,714	0	0	2,714	100	2,699	0	0	2,699	100
Female	74	0	0	74	100	79	0	0	79	100
Other than Permanent	94	0	0	94	100	141	0	0	141	100
Male	90	0	0	90	100	136	0	0	136	100
Female	4	0	0	4	100	5	0	0	5	100
Workers										
Permanent	330	0	0	330	100	351	0	0	351	100
Male	329	0	0	329	100	350	0	0	350	100
Female	1	0	0	1	100	1	0	0	1	100
Other than Permanent	42,042	0	0	42,042	100	43	0	0	43	100
Male	40,080	0	0	40,080	100	43	0	0	43	100
Female	1,962	0	0	1,962	100	0	0	0	0	0

3. Details of remuneration/salary/wages

a. Median remuneration / wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (lakh)	Number	Median remuneration/ salary/ wages of respective category (lakh)
Board of Directors (BoD)	9	33.3	1	42.6
Key Managerial Personnel	5	709.96	0	0
Employees other than BoD and KMP	2,524	15.02	70	9.13
Workers	338	7.74	1	4.78

b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

	FY 2024-25	FY 2023-24
Gross wages paid to females as % of total wages	1.62	1.9

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

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

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

Stakeholders can raise concerns pertaining to human rights issues as per Whistle-blower Policy or by using online grievance management system available on Company website or by directly reaching to the Grievance redressal team through dedicated email – grievance.apsez@adani.com. Organization does not impede access to state-based judicial processes. Business HR conducts periodic audits to ensure compliance with the Human Rights Policies and ensure any issues or impacts are addressed in the defined manner within the stipulated timeline.

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

	FY 2024-25			FY 2023-24		
	Current Financial Year			Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0		0	0	NA
Discrimination at workplace	0	0		0	0	NA
Child Labour	0	0		0	0	NA
Forced Labour/Involuntary Labour	0	0		0	0	NA
Wages	3	0		0	0	NA
Other human rights related issues	0	0		0	0	NA

7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

	FY 2024-25	FY 2023-24
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

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

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

To keep an eye on any harassment and discrimination cases within our company, the Corporate Responsibility Committee ensures a strategic alignment of sustainability and human rights with the business. The Risk Management Committee oversees the potential and actual risk pertaining to human rights at every stage of the project including merger and acquisition through human rights due diligence. Ultimate oversight for human rights resides with the Board of Directors, which are briefed on a quarterly basis by the ESG Head.

To make our stakeholders aware of relevant guidelines pertaining to human rights, we upload these on our Company website for easy access to all employees and stakeholders. Awareness and familiarization sessions for different sets of employee population are also conducted.

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

Yes, all the suppliers and vendors are required to adhere to APSEZ's Supplier Code of Conduct and Human Rights guidelines which provides comprehensive guiding principles and embodies our commitment to internationally recognized standards, including UN Global Compact, the core conventions of the International Labor Organization (ILO) and United Nations' Universal Declaration of Human Rights and prevalent industry standards for our vendors and suppliers. APSEZL has zero tolerance towards violation of human rights and keeps a strict vigil on the policies and practices followed by the suppliers. Also, we try to enforce the best practices on human rights in our supply chain using the influence we have on our suppliers. Our expectation of respect for human rights from all our business partners is unambiguously conveyed at multiple levels of engagement. During the on-boarding process and later, the suppliers undergo third party audit of their operations for compliance with safe working condition requirements, avoidance of child and forced labour, environmental and social impacts, and human rights due diligence. The human rights aspects are also covered in-depth in our annual survey of the vendors and the training programs organized for them. In the survey, the suppliers are required to disclose their policy to avoid child labour, forced labour, workplace harassment, gender & ethnic discrimination and their human rights due diligence process. The suppliers are assessed on whether their policy is aligned with the requirements set by APSEZL for their suppliers and business partners.

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

10. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	All APSEZ's plants and offices have undergone assessments for compliance with key human rights issues conducted by the company's internal teams. These assessments are part of the regular reviews carried out by the senior leadership team.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	

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

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

Fair Wages

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

Health & Safety

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

Forced Labour

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

Discrimination & harassment

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

Leadership Indicators

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

APSEZL fostered an inclusive culture free from discrimination and powered by diverse employee capabilities. The Company is committed to free and fair employment practices free of any harassment based on race, religion, colour, age, sexual orientation, national origin, disability, or any other classification as mandated by national laws, ILO and UNGP guidelines. The Company's commitment to human rights is reflected in its governance, procurement, and social strategy. APSEZL remained committed to uphold human rights across its value chain and its commitment was reflected in due diligence and implementation framework governed by the following policies:

- a. Adani Group policy on Human Rights
- b. Human Rights Guidelines
- c. Supplier Code of Conduct

- d. Corporate Social Responsibility Policy
- e. Stakeholder Engagement Policy
- f. Guidelines for employment of Differently abled people
- g. Business Responsibility Policy
- h. Group Guidelines on Prevention of Sexual Harassment of Women at Workplace
- i. Adani Group Code of Conduct Policy

In addition to the above policy implementation, this year we have amended our Human Rights Guidelines, Diversity, Equity & Inclusive Policy, and Supplier Code of conduct. We have conducted a human rights survey covering all our stakeholders. This year, we have asked the employees about any workplace harassment, or discrimination faced by them, the effectiveness of the system to identify and report human rights issues, and the awareness of various means to report any abuse. The Employee Grievance Management System has been launched at group level. The vendor onboarding process through ARIBA portal covers the Human rights related requirements. In addition, supplier/vendor and customer sustainability and ESG assessment has Human Right component integrated.

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

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

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

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

Yes, we strongly promote equal opportunities for everyone, and we acknowledge the importance of having a diverse and equitable work environment. We have designed workplaces to enable employees with disabilities to carry out their jobs. Our Corporate office has ramps at entry locations and lobbies to facilitate wheelchairs. We have dedicated toilets for differently abled employees. We have elevators with Braille signs, designed for blind people or visually impaired people. Our other locations also comply with all the national/local requirements to accommodate differently abled person and their needs.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	67
Discrimination at workplace	67
Child Labour	67
Forced Labour/Involuntary Labour	67
Wages	67
Others – please specify	-

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

Our assessment is designed to ensure that potential issues of forced labor are captured and brought to our attention. Our suppliers are expected to embed following system:

- a. A responsible recruitment procedure
- b. Due diligence and screening process

- c. Clear contract with agencies
- d. Training for management and workers
- e. Grievance mechanism

Provided training to all the employees for awareness of diversity of workforce and work-related harassment, and discrimination.

Suppliers are audited for their policy commitment and systems and processes for prevention of harassment and discrimination.

Before the suppliers onboarding process, we make sure they comply with all applicable laws and regulations with respect to minimum wages.

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

Essential Indicators

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

Parameter	UOM	FY 2024-25	FY 2023-24
From renewable sources			
Total electricity consumption (A)	TJ	283	228
Total fuel consumption (B)	TJ	0	0
Energy consumption through other sources (C)	TJ	0	0
Total energy consumed from renewable sources (A+B+C)	TJ	283	228
From non-renewable sources			
Total electricity consumption (D)	TJ	1,509	1,565
Total fuel consumption (E)	TJ	1,998	1,660
Energy consumption through other sources (F)	TJ	0	0
Total energy consumed from non-renewable sources (D+E+F)	TJ	3,507	3,225
Total energy consumed (A+B+C+D+E+F)	TJ	3,790	3,453
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	GJ/Cr	117	122
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	GJ/million USD PPP Adj	2,418	2,768
Energy intensity in terms of physical output			
Energy intensity (optional) – the relevant metric may be selected by the entity	TJ/MMT	8.4	8.2

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

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

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

Parameter	UOM	FY 2024-25	FY 2023-24
Water withdrawal by source (in kilolitres)			
(i) Surface water	KL	19,88,434	13,50,678
(ii) Groundwater	KL	4,12,709	4,10,463
(iii) Third party water	KL	21,61,827	29,38,298
(iv) Seawater / desalinated water	KL	21,21,371	17,78,522

Parameter	UOM	FY 2024-25	FY 2023-24
(v) Others	KL	11,11,378	12,20,162
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	KL	77,95,720	76,98,123
Total volume of water consumption (in kilolitres)	KL	76,72,982	70,36,727
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	ML/Cr	0.24	0.25
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	ML/USD Cr	4.90	5.165
Water intensity in terms of physical output	ML/MMT	17.04	16.75
Water intensity (optional) – the relevant metric may be selected by the entity			

4. Provide the following details related to water discharged:

Parameter	UOM	FY 2024-25	FY 2023-24
Water discharge by destination and level of treatment (in kilolitres)			
(i) To Surface water		0	0
- No treatment		NA	NA
- With treatment – please specify level of treatment		NA	NA
(ii) To Groundwater		0	0
- No treatment		NA	NA
- With treatment – please specify level of treatment		NA	NA
(iii) To Seawater		0	0
- No treatment		NA	NA
- With treatment – please specify level of treatment		NA	NA
(iv) Sent to third-parties		0	0
- No treatment		NA	NA
- With treatment – please specify level of treatment		NA	NA
(v) Others		0	0
- No treatment		NA	NA
- With treatment – please specify level of treatment		NA	NA
Total water discharged (in kilolitres)		0	0

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

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

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

Parameter	UOM	FY 2024-25	FY 2023-24
NOx	µg/m ³	16.57	44.25
SOx	µg/m ³	13.54	38.91
Particulate matter (PM)	µg/m ³	46.43	54
Persistent organic pollutants (POP)		-	-
Volatile organic compounds (VOC)		-	-
Hazardous air pollutants (HAP)		-	-
Others – please specify		-	-

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

Parameter	UOM	FY 2024-25	FY 2023-24
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	1,50,398	1,26,197
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	3,23,098	3,43,428
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO ₂ equivalent/ INR crore	14.6	16.6
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	Metric tonnes of CO ₂ equivalent/ USD crore	302	343
Total Scope 1 and Scope 2 emission intensity in terms of physical output	KT CO ₂ e/MMT	1.1	1.12
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity			

8. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details. Refer the Emission reduction initiatives of integrated report.

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

Parameter	FY 2024-25	FY 2023-24
Total Waste generated (in metric tonnes)		
Plastic waste (A)	318	591
E-waste (B)	58	82
Bio-medical waste (C)	15	125
Construction and demolition waste (D)	165	0
Battery waste (E)	37	56
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any.(G)	5,975	2,307
Other Non-hazardous waste generated(H).Please specify,if any. (Break-upbycompositioni.e.by materials relevant to the sector)	5,777	10,073

Parameter	FY 2024-25	FY 2023-24
Total (A+B + C + D + E + F + G + H)	12,345	13,234
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.38	0.27
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	7.88	5.56
Waste intensity in terms of physical output	27.4	32
Waste intensity (optional) – the relevant metric may be selected by the entity		
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	4,708	7,058
(ii) Re-used	539	783
(iii) Other recovery operations	4,044	2,259
Total	9,291	10,101
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	600	280
(ii) Landfilling	2,088	893
(iii) Other disposal operations	366	1,961
Total	3,054	3,133

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

APSEZL, being in the service industry (i.e., provides services for cargo handling & logistics, operations & maintenance of port sector) does not produce any products using hazardous and toxic chemicals. As such, we don't have potential to recycle generated waste in our operations. However, APSEZL complies with all the applicable regulatory requirements pertaining to waste management. Achieving Zero Waste to Landfill at all our sites by FY 2024-25 is an ambitious sustainability goal that aims to divert all waste from landfills and eliminate the need for traditional waste disposal practices.

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

- We have implemented a sustainable waste management practice by recycling bio-degradable waste and using it as manure.
- Non-biodegradable waste such as paper, plastic, and scrap are sent to recyclers.
- Non-recyclable and non-recoverable dry waste (loose refused derived fuel) was sent to cement plants for co-processing.
- STP sludge was used as soil conditioner/manure.
- APSEZL has successfully accomplished its objective of establishing a single-use plastic-free port across its sites as part of its commitment to the 5R's principle.
- We continuously educate and train our employees on responsible waste disposal practices to ensure that they are aware of their roles in implementing sustainable waste management practices.

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

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1	All ports & Terminal falls under coastal regulation zone (CRZ) area	Handling & storage of cargo	Yes*

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

12. 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
Waterfront Development Expansion of Mundra Port	SO 1533	August' 2024	Yes	Yes	Welcome to PARIVESH
Development of 1576.81 Ha SEZ / IP at Mundra (draft EIA)	SO 1533	-	Yes	No	Draft EIA has been prepared and Public Hearing Conducted. Now at the time of CRZ application EIA will be submitted and uploaded on Parivesh portal.
Master Plan Development of Vizhinjam International Deepwater Multipurpose Seaport at Vizhinjam, Kerala by Vizhinjam International Seaport Limited Located at Thiruvananthapuram, Kerala	SO 1533	March'25	Yes	Yes	https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=IA%2FKL%2FINFRA1%2F517128%2F2025&proposal=116616320
Development of Berth 4 & 5 at Kattupalli Port over an area of 136.28 Ha. The project site is located in Kattupalli Village, Ponneri Taluk, Thiruvallur District, Tamil Nadu by M/s Marine Infrastructure Developer Private Limited (MIDPL)	SO 1533	March'25	Yes	Yes	https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=IA%2FTN%2FINFRA1%2F518970%2F2025&proposal=117789787

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
Environmental Impact Assessment report for Amendment in EC & CRZ Clearance for Change in Cargo Mix for Development of Liquid Cargo Storage and Handling within Adani Gangavaram Port Limited	SO 1533	December '24	Yes	Yes	https://parivesh.nic.in/newupgrade/#!/trackYourProposal/proposal-details?proposalId=IA%2FAP%2FCRZ%2F501027%2F2024&proposal=109638250

13. 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:

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

Leadership Indicators

1. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres): For each facility / plant located in areas of water stress, provide the following information:

- Name of the area: Patli, Kishangarh, Kilarapur, Malur, Loni, Kanech, Dewas, Kannauj, Kotkapura, Panipat, Ujjain, Moga, Kaithal and Malur
- Nature of operations: Logistic services
- Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2024-25	FY 2023-24
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	98,497	1,57,816
(iii) Third party water	100	0
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres)	98.597	1,57,816
Total volume of water consumption (in kilolitres)	98,123	1,19,718
Water intensity per rupee of turnover (Water consumed / turnover)	3.03	4.2
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA
Water discharge by destination and level of treatment (in kilolitres)		

Parameter	FY 2024-25	FY 2023-24
(i) Into Surface water	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) Into Groundwater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) Into Seawater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (in kilolitres)	0	0

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

Parameter	UOM	FY 2024-25	FY 2023-24
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	20,05,650	18,87,215
Total Scope 3 emissions per rupee of turnover	tCO ₂ e/Cr.	62	67
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

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

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

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
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Refer ESG Section of the Integrated Report

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

Yes, APSEZ has "Onsite Emergency plan & Disaster Control" measure in place, focusing on business continuity to address disruptive events like Oil spillage, fire, cyber-attacks, acts of terror, etc. The practices have been

developed through benchmarking against best practices at other organizations with mature Business Continuity Management practices. All our ports have on-site and off-site disaster management plans in place. The same is submitted to MOEF & CC as part of the half yearly EC & CRZ compliance report.

Mundra port onsite emergency plan can be seen at our website: <https://www.adaniports.com/Downloads>

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

There has been no significant adverse impact arising from the value chain of APSEZ.

We make sure to take all the necessary measures to reduce any adverse environmental impacts arising from our value chain. For instance, none of the vessels entering the port limit are allowed to discharge any waste, bilge, ballast into the water. The company has provided waste reception facilities for incoming vessels to avoid marine water pollution. Also, PUC certification has been mandated for incoming vehicles to minimize emissions. We are also working towards electrification of Corporate Overview Statutory Reports Financial Section 397 railway lines to minimize emissions. Under the International Maritime Organization's MARPOL 73/78 convention, vessels that call at our port deliver their waste safely to our facility at a nominal charge, in alignment with the 'polluter pays' principle.

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

67% of value chain partners were assessed for environmental impacts. Details of assessment of value chain partners for assessed for ESG has been provided under Supplier section in our Integrated Annual Report FY 2024-25.

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

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations: 13
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

Sr. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Indian Maritime Centre (IMC)	National
2	World Economic Forum (WEF)	National
3	Federation of Indian Chamber of Commerce and Industry (FICCI)	National
4	Quality Circle Forum of India (QCFI)	National
5	The Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
6	Federation of Indian Export Organizations (FIEO)	National
7	Confederation of Indian Industry (CII)	National
8	Federation of Kutch Industries associations (FOKIA)	State
9	Hazira Area Industries Association (HAIA)	State
10	Southern Gujarat Chamber of Commerce & Industries (SGCCI)	State

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

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

Leadership Indicators

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

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
1	Harit Sagar, The green port guidelines 2023	Internal communication	No	Quarterly	N/A
2	Transitioning Industrial Clusters	Partnering with WEF for a Sustainable Future	Yes	Others	https://www.adani.com/newsroom/media-releases/adani-to-play-a-key-role-in-global-decarbonisation-wef-announces#:~:text=This%20initiative%20aims%20to%20enhance,a%20thriving%2C%20portled%20industrial%20cluster.
3	GHG Emission control under ministry of port, shipping & water ways	Discussion at marine environment protection committee (MEPC)	No	Quarterly	N/A

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

Essential Indicators

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
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The Social Impact Assessment (SIA) is integrated into our Environmental Impact Assessment. Detailed information is available under Principle 6 (Essential Indicator), question 12. No separate or additional SIA has been conducted.

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

S. No.	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 INR)
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NIL

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

The Company's grievance reporting initiatives comprised a 24x7 grievance reporting mechanism through its website, dedicated telephone numbers and drop boxes at prominent locations. Several people across the company's sites (supervisors, seniors, and department heads) can be reached directly for reporting grievances. The Company provides communities with a grievance reporting system (recorded, reviewed, escalated, and

actioned upon within a timeframe). A Grievance Management System was implemented for the aggrieved to view status, resolution, and feedback. The Company is further in the process of developing and rolling out of an integrated Grievance Management System wherein all types of grievance will feed into one integrated system.

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

	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/ small producers	17%	22%
Directly from within India	78%	73%

5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost

Location	FY 2024-25	FY 2023-24
Rural	36%	34%
Semi-urban	23%	25%
Urban	5%	5%
Metropolitan	35%	35%

Leadership Indicators

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

Details of negative social impact identified	Corrective action taken
Not Applicable	

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

S. No.	State	Aspirational District	Amount spent (In INR)
1	Andhra Pradesh	Vishakhapatnam	13,00,00,000

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

Yes, APSEZL has a Sustainable Procurement Policy and Supplier Code of Conduct in place, which covers the aspect related to procurement/purchase from marginalized/vulnerable groups. APSEZL is driving economic development by enhancing procurement processes for social and environmental gains. The procurement focus was not just on local development but a range of accrued benefits of lower costs, higher brand recognition and livelihood support. Local vendors generally employ hundreds unlikely to leave that city, delivering benefits for the local economy in which they are based. Utilizing procurement more progressively and innovatively has facilitated the participation of small to medium sized enterprises (SMEs) in public procurement in support of common societal goals. For further details refer to the Supply Chain section of our Integrated Annual Report FY 2024-25.

b. From which marginalized /vulnerable groups do you procure?

Local/regional suppliers and Local communities.

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

During FY 2024-25, 56% of the Company's procurement was derived from local State vendors and 22% from the same district.

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

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
NA				

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

Name of authority	Brief of the Case	Corrective action taken
NA		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Adani Chikistalayam	3,680	4%
2	AEEC - Adani Evening Education Centers	1,570	22%
3	AMMA	4,600	51%
4	Anganwadi English Medium Centers	76	13%
5	Annapurna	850	47%
6	Climate Action	32,870	4%
7	Community Development	1,22,321	10%
8	Education	31,697	36%
9	Fisherman Jetty	4,600	0%
10	Fogging Operation	16,000	0%
11	Health	3,69,970	47%
12	Kamadhenu	550	51%
13	Meri Sangini Meri Margadarsika	46	7%
14	RO Water Plants	13,650	0%
15	Rural Sports	850	6%
16	Support to Govt., Schools	884	8%
17	Sustainable Livelihood	29,271	49%
18	ULIC - Utthan Learning Improvement Classes	1,496	5%
19	Utthan: Education	11,875	23%
20	Vidyarathna Scholarships	6	17%
21	Village Health Camps	8,600	3%
22	Vruksh se Vikas	35,650	0%

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

Essential Indicators

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

The company has formal mechanisms in place to collect feedback from the customers. The customers can reach out with their complaints related to our services or payment transactions through mail or online portal and a time-bound solution is provided to them. To report any grievance, we can be reached at Grievance.apsez@adani.

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

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

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

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

	FY 2024-25			FY 2023-24		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0	Nil	0	0	Nil
Advertising	0	0	Nil	0	0	Nil
Cyber-security	0	0	Nil	0	0	Nil
Delivery of essential services	0	0	Nil	0	0	Nil
Restrictive Trade Practices	0	0	Nil	0	0	Nil
Unfair Trade Practices	0	0	Nil	0	0	Nil
Other	0	0	Nil	0	0	Nil

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

Number	Reasons for recall
Voluntary recalls	Not Applicable
Forced recalls	

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, APSEZL has a Cyber Security Policy: <https://www.adaniports.com/-/media/Project/Ports/Investor/corporate-governance/Policies/Adani-Cyber-Security-Policy.pdf> in place that covers all aspects of cyber risk for IT and business areas. We are committed to establishing and improving cyber security posture and minimizing our exposure to such risks. Please refer to the integrated report section of **Harnessing technology to enhance cybersecurity**.

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

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

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

7. Provide the following information relating to data breaches:

- a. Number of instances of data breaches: 0
- b. Percentage of data breaches involving personally identifiable information of customers: 0
- c. Impact, if any, of the data breaches: There has been no such instance which has occurred during FY 2024-25.

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

Yes, all the required information about our services has been uploaded on our website and can be accessed at: Growth with Sustainability - Adani Ports and SEZ Ltd: <https://www.adaniports.com/> Downloads (adaniports.com): <https://www.adaniports.com/Downloads> Corporate Governance: Adani Ports and Logistics

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

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

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

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

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

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

Not Applicable

Independent Assurance Statement

To
 Adani Ports & Special Economic Zone Ltd. (APSEZL)
 Adani Corporate House, Shantigram
 Near Vaishno Devi Circle, S. G. Highway, Khodiyar
 Ahmedabad-382421, Gujarat, India

Adani Ports & Special Economic Zone Ltd. (APSEZL) (hereafter 'APSEZL') commissioned TUV India Private Limited (TUVI) to conduct independent external assurance of BRSR Core disclosures ([09 attributes as per Annexure I - Format of BRSR Core](#)) following the ([BRSR Core –Framework for assurance and ESG disclosures for value chain](#) stipulated in SEBI circular [SEBI/HQ/CFD/CFD-SEC-2/P/CIR/2023/122, dated 12/07/2023](#) and [Industry Standards on Reporting of BRSR Core, circular SEBI/HQ/CFD/CFD-PoD-1/P/CIR/2024/177, dated 20/12/2024](#)) with reasonable assurance along with reasonable assurance of the [09 BRSR principles covering Essential and Leadership Indicators](#). APSEZL developed Business Responsibility and Sustainability Report (hereinafter 'the BRSR') for the period 01/04/2024 to 31/03/2025. The BRSR is based on the National Guidelines on Responsible Business Conduct (NGRBC), [SEBI circular, SEBI/HQ/CFD/CMD-2/P/CIR/2021/562, dated 10/05/2021](#) followed by the notification number [SEBI/LAD-NRO/GN/2023/131, dated 14/06/2023](#) pertaining to BRSR requirement. This assurance engagement was conducted in reference with BRSR, the terms of our engagement and ISAE 3000 (Revised) requirement.

Management's Responsibility

APSEZL developed the BRSR's content pertaining to the [09 BRSR principles covering Essential and Leadership Indicators](#) including the Core disclosures ([09 attributes as per Annexure I - Format of BRSR Core](#)). APSEZL management is responsible for carrying out the collection, analysis, and disclosure of the information presented in the BRSR (web-based and print), including website maintenance, integrity, and for ensuring its quality and accuracy in reference with the applied criteria stated in the BRSR, such that it's free of intended or unintended material misstatements. APSEZL will be responsible for archiving and reproducing the disclosed data to the stakeholders and regulators upon request.

Scope and Boundary

The scope of work includes the assurance of the following [09 BRSR principles covering Essential and Leadership Indicators](#) and [09 attributes as per Annexure I - Format of BRSR Core](#) disclosed in the BRSR report. The BRSR core requirements encompass essential disclosures pertaining to organization's Environmental, Social and Governance (ESG). In particular, the assurance engagement included the following:

- i. Review of [09 attributes as per Annexure I - Format of BRSR Core](#) submitted by APSEZL.
- ii. Review of [09 principles of BRSR covering Essential and Leadership indicators](#) submitted by APZEL.
- iii. Review of the quality of information.
- iv. Review of evidence (on a random samples) for reasonable assurance of [09 BRSR principles covering Essential and Leadership Indicators](#) and [09 attributes as per Annexure I - Format of BRSR Core](#).

TUVI has verified the below [09 attributes as per Annexure I - Format of BRSR Core](#) disclosed in the BRSR:

Attributes	KPI
Green-house gas (GHG) footprint Boundary: All domestic and international operations.	Total Scope 1 emissions (with breakup by type) - GHG (CO ₂ e) Emission in MT - Direct emissions from organization's owned- or controlled sources
	Total Scope 2 emissions in MT - Indirect emissions from the generation of energy that is purchased from a utility provider
	GHG Emission Intensity (Scope 1+2), Total Scope 1 and Scope 2 emissions (MT) / Total Revenue from Operations adjusted for PPP
	GHG Emission Intensity (Scope 1+2), (Total Scope 1 and Scope 2 emissions (MT) / Cargo Handled (MMT)
Water footprint Boundary: All domestic and international operations.	Total water consumption (in kL)
	Water consumption intensity - kL / Total Revenue from Operations adjusted for PPP
	Water consumption intensity - kL / Cargo Handled (MMT)
	Water Discharge by destination and levels of Treatment (kL)
Energy footprint Boundary: All domestic and international operations.	Total energy consumed in GJ
	% of energy consumed from renewable sources - In % terms
	Energy intensity - GJ/ Rupee adjusted for PPP
	Energy intensity - GJ / Cargo Handled (MMT)
Embracing circularity - details related to waste management by the entity Boundary: All domestic and international operations.	Plastic waste (A) (MT)
	E-waste (B) (MT)
	Bio-medical waste (C) (MT)
	Battery waste (D) (MT)
	Engine oil (E)
	Oil containers (F)
	Engineering spares (G) (MT)
	Mixed metal (H) (MT)
	Mixed Organic (I) (MT)
	Total waste generated (A + B + C + D + E + F+G+H+I) (MT)
	Waste intensity

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Attributes	KPI
	<ul style="list-style-type: none"> MT / Rupee adjusted for PPP MT /Cargo Handled (MMT)
	Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (MT)
	Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (Intensity)
	✓ Waste Recycled Recovered /Total Waste generated
	For each category of waste generated, total waste disposed by nature of disposal method (MT)
	For each category of waste generated, total waste disposed by nature of disposal method (Intensity)
	✓ Waste Recycled Recovered /Total Waste generated
Enhancing Employee Wellbeing and Safety	Spending on measures towards well-being of employees and workers – cost incurred as a % of total revenue of the company - In % terms Details of safety related incidents for employees and workers (including contract-workforce e.g. workers in the company's construction sites) <ol style="list-style-type: none"> Number of Permanent Disabilities Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) No. of fatalities
Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid - In % terms Complaints on POSH <ol style="list-style-type: none"> Total Complaints on Sexual Harassment (POSH) reported Complaints on POSH as a % of female employees / workers Complaints on POSH upheld
Enabling Inclusive Development	Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India - In % terms – As % of total purchases by value Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent / on contract) as % of total wage cost - In % terms – As % of total wage cost
Fairness in Engaging with Customers and Suppliers	Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events - In % terms Number of days of accounts payable - (Accounts payable *365) / Cost of goods/services procured
Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties <ol style="list-style-type: none"> Purchases from trading houses as % of total purchases Number of trading houses where purchases are made from Purchases from top 10 trading houses as % of total purchases from trading houses Sales to dealers / distributors as % of total sales Number of dealers / distributors to whom sales are made Sales to top 10 dealers / distributors as % of total sales to dealers / distributors Share of RPTs (as respective %age) in - <ul style="list-style-type: none"> Purchases Sales Loans & advances Investments

TUVI has verified the below principle wise performance disclosure Essential and Leadership Indicators disclosed in the BRSR

BRSR Principles	Essential Indicators	Leadership Indicators
PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner, that is Ethical, Transparent and Accountable.	1,2,3,4,5,6,8,9	1,2
PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe	2,3,4	3
PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15	1,2,3,4,5,6
PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders	1,2	1,2,3
PRINCIPLE 5: Businesses should respect and promote human rights	1,2,3(a),4,5,6,7,8,9,10,11	1,2,3,4,5
PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment	1,3,4,5,6,7,8,9,10,11,12,13	1,2,3,4,5,6,7,8
PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent	1,2	1
PRINCIPLE 8: Businesses should promote inclusive growth and equitable development	1,2,3,4,5	2,3,6
PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner	1,3,5,6,7	1,2,3

Note: Disclosures reported as 'Not applicable' are not included in table above.

Notes:

Energy: For all offices, in absence of monitoring of actual vehicular fuel consumption (i.e., Petrol/Diesel/CNG) data attributable to owned & leased vehicle for employees & upstream vendor transportation, the GHG emissions are estimated by calculating the fuel consumption in liters using the formula, (Distance Travelled in KM) / Fuel efficiency of the vehicle).

Waste: The data of total waste recovered through recycling, re-using or other recovery operations or total waste disposed by nature of disposal method could be assessed based on interviews and sample records as presented during the onsite visit.

The reporting boundaries for the above attributes include APSEZL integrated services in the ports, logistics, port-based services and SEZ segment with 15 Nos. domestic and 2 international ports/terminals & corporate office. It also extend to its subsidiary Adani Logistics Limited (ALL), operating 8 Nos. warehouses, 12 logistic parks and 20 Nos. of Agri silos. APSEZ serves 28 states/UT in India and have five ports and one office outside India. An on-site verification was conducted at four ports and the Corporate Office between 19/11/2024 to 19/03/2025.

Onsite Verification

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1. Adani Hazira Ports Ltd, Hazira: 19/11/2024 and 20/11/2024
2. Adani Ports & SEZ Ltd., Mundra: 21/11/2024 and 22/11/2024
3. Adani Dhamra Port Ltd., Dhamra :26/11/2024 and 27/11/2024
4. Adani Gangavaram Ports Ltd, Gangavaram : 29/11/2024 and 30/11/2024
5. Adani Corporate House, Ahmedabad: 17/03/2025 to 19/03/2025

The assurance activities were carried out together with a desk review as per reporting boundary.

Limitations

TUVI did not perform any assurance procedures on the prospective information disclosed in the Report, including targets, expectations, and ambitions. Consequently, TUVI draws no conclusion on the prospective information. During the assurance process, TUVI did not come across any limitation to the agreed scope of the assurance engagement. TUVI did not verify any ESG goals and claim through this assignment. TUVI verified data on a sample basis; the responsibility for the authenticity of data entirely lies with APSEZ. Any dependence of person or third party may place on the BRSR Report is entirely at its own risk. TUVI has taken reference of the financial figures from the audited financial reports. APSEZ will be responsible for the appropriate application of the financial data. The application of this assurance statement is limited w.r.t [SEBI circular SEBI/HQ/CFD/CFD-SEC-2/P/CIR/2023/122, dated Jul 12, 2023 and Industry Standards on Reporting of BRSR Core, circular SEBI/HQ/CFD/CFD-PoD-1/P/CIR/2024/177, dated 20/12/2024](#). This assurance statement does not endorse any environmental and social claims (related to the product, manufacturing process, packaging, disposal of product etc.) as well as advertisements by the reporting organization. TUVI does not permit use of this statement for Greenwashing or misleading claims. The reporting Organization is responsible for ensuring adherence to relevant laws.

Our Responsibility

TUVI's responsibility in relation to this engagement is to perform a reasonable level of BRSR assurance for [09 BRSR principles covering Essential and Leadership Indicators](#) and [09 attributes as per Annexure I - Format of BRSR Core](#) and to express a conclusion based on the work performed. Our engagement did not include an assessment of the adequacy or the effectiveness of APSEZ's strategy, management of ESG-related issues or the sufficiency of the Report against BRSR reporting principles, other than those mentioned in the scope of the assurance. TUVI's responsibility regarding this verification is in reference to the agreed scope of work, which includes assurance of non-financial quantitative and qualitative information disclosed by APSEZ. Reporting Organization is responsible for archiving the related data for a reasonable time period. The intended users of this assurance statement are the management of 'APSEZ'. The data is verified on a sample basis, the responsibility for the authenticity of data lies with the reporting organization. TUVI expressly disclaims any liability or co-responsibility 1) for any decision a person or entity would make based on this assurance statement and 2) for any damages in case of erroneous data is reported. This assurance engagement is based on the assumption that the data and information provided to TUVI by APSEZ are complete and true.

Verification Methodology

During the assurance engagement, TUVI adopted a risk-based approach, focusing on verification efforts with respect to disclosures. TUVI has verified the disclosures and assessed the robustness of the underlying data management system, information flows, and controls. In doing so:

- a) TUVI examined and reviewed the documents, data, and other information made available by APSEZL for non-financial [09 BRSR principles covering Essential and Leadership Indicators](#) and [09 attributes as per Annexure I - Format of BRSR Core](#) (non-financial disclosures)
- b) TUVI conducted interviews with key representatives, including data owners and decision-makers from different functions of APSEZL.
- c) TUVI performed sample-based reviews of the mechanisms for implementing the sustainability-related policies and data management (quantitative and qualitative)
- d) TUVI reviewed the adherence to reporting requirements of "BRSR"

Opportunities for Improvement

The following are the opportunities for improvement reported to APSEZL. However, they are generally consistent with APSEZL management's objectives and programs. APSEZL already identified below topics and Assurance team endorse the same to achieve the Sustainable Goals of organization.

- i. APSEZL may strengthen its internal reporting by opting a smart cloud-based data management system and compliment the same with periodic internal data and performance reviews.
- ii. APSEZL can further emphasize on imparting Health & Safety, Human Rights and skill development training to its workers across the operational boundary.
- iii. APSEZL may strengthen the process of accounting and addressing the grievances received from stakeholder at local/ community level.
- iv. APSEZL may develop an integrated platform to strengthen the process of the consumer complaints redressal.

Conflict of Interest

In the context of BRSR requirements set by SEBI, addressing conflict of interest is crucial to maintain high integrity and independence of assurance engagements. As per SEBI guidelines, assurance providers need to disclose any potential conflict of interest that could compromise the independence or neutrality of their assessments. TUVI diligently identifies any relationships, affiliations, or financial interests that could potentially cause conflict of interest. We proactively implement measures to mitigate or manage these conflicts, ensuring independence and impartiality in our assurance engagements. We provide clear and transparent disclosures about any identified conflicts of interest in our assurance statement. We recognize that failure to address conflict of interest adequately could undermine the credibility of the assurance process and the reliability of the reported information. Therefore, we strictly adhere to SEBI guidelines and take necessary measures to avoid, disclose, or mitigate conflicts of interest effectively.

Our Conclusion

In our opinion, based on the scope of this assurance engagement, the disclosures on BRSR Core KPI described in the BRSR report along with the referenced information provides a fair representation of the 9 attributes, and meets the general content and quality requirements of the BRSR. TUVI

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confirms its competency to conduct the assurance engagement for the BRSR as per SEBI guidelines. Our team possesses expertise in ESG verification, assurance methodologies, and regulatory frameworks. We ensure independence, employ robust methodologies, and maintain continuous improvement to deliver reliable assessments.

Disclosures: TUVI is of the opinion that the reported disclosures generally meet the BRSR requirements. APSEZL refers to general disclosure to report contextual information about APSEZL, while the Management & Process disclosures the management approach for each indicator [09 attributes as per Annexure I - Format of BRSR Core and 09 BRSR principles covering Essential and Leadership Indicators](#).

Reasonable Assurance: As per SEBI reasonable assurance requirements including scope of Assurance, Assurance methodologies (risk-based approach and data validation techniques), mitigating conflicts of interests, documentation on evidence and communication on findings, TUVI can effectively validate the accuracy and reliability of the information presented in the BRSR, instilling confidence in stakeholders and promoting transparency and credibility in ESG reporting practices.

BRSR complies with the below requirements

- a) Governance, leadership and oversight: The messages of top management, the business model to promote inclusive growth and equitable development, action and strategies, focus on services, risk management, protection and restoration of environment, and priorities are disclosed appropriately.
- b) Connectivity of information: APSEZL discloses [09 attributes as per Annexure I - Format of BRSR Core and 09 BRSR principles covering Essential and Leadership Indicators](#) and their interrelatedness and dependencies with factors that affect the organization's ability to create value over time.
- c) Stakeholder responsiveness: The Report covers mechanisms of communication with key stakeholders to identify major concerns to derive and prioritize the short, medium and long-term strategies. The Report provides insights into the organization's relationships (nature and quality) with its key stakeholders. In addition, the Report provides a fair representation of the extent to which the organization understands, takes into account and responds to the legitimate needs and interests of key stakeholders.
- d) Materiality: The material issues within 9 attributes and corresponding KPI as per BRSR requirement are reported properly.
- e) Conciseness: The Report reproduces the requisite information and communicates clear information in as few words as possible. The disclosures are expressed briefly and to the point sentences, graphs, pictorial, tabular representation is applied. At the same time, due care is taken to maintain continuity of information flow in the BRSR.
- f) Reliability and completeness: APSEZL has established internal data aggregation and evaluation systems to derive the performance. APSEZL confirms that, all data provided to TUVI, has been passed through QA/QC function. The majority of the data and information was verified by TUVI's assurance team (on sample basis) during the BRSR verification and found to be fairly accurate. All data, is reported transparently, in a neutral tone and without material error.
- g) Consistency and comparability: The information presented in the BRSR is on yearly basis. and founds reliable and complete manner. Thus, the principle of consistency and comparability is established.

Independence and Code of Conduct: TUVI follows IESBA (International Ethics Standards Board for Accountants) Code which, adopts a threats and safeguards approach to independence. We recognize the importance of maintaining independence in our engagements and actively manage threats such as self-interest, self-review, advocacy, and familiarity. The assessment team was safeguarded from any type of intimidation. By adhering to these principles, we uphold the trust and confidence of our clients and stakeholders. In line with the requirements of the SEBI [circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated 12/07/2023 and Industry Standards on Reporting of BRSR Core, circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177, dated 20/12/2024](#). TUVI confirms that there is no conflict of interest with APSEZL.

TUVI solely focuses on delivering verification and assurance services and does not engage in the sale of service or the provision of any non-audit/non-assurance services, including consulting.

Quality control: The assurance team complies with quality control standards, ensuring that the engagement partner possesses requisite expertise and the assigned team collectively has the necessary competence to perform engagements in reference with standards and regulations. Assurance team follows the fundamental principles of integrity, objectivity, professional competence, due care, confidentiality and professional behaviour. In accordance with International Standard on Quality Control, TUVI maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our Assurance Team and Independence

TUVI is an independent, neutral third-party providing ESG Assurance services with qualified environmental and social specialists. TUVI states its independence and impartiality and confirms that there is "no conflict of interest" with regard to this assurance engagement. In the reporting year, TUVI did not work with APSEZL on any engagement that could compromise the independence or impartiality of our findings, conclusions, and observations. TUVI was not involved in the preparation of any content or data included in the BRSR, with the exception of this assurance statement. TUVI maintains complete impartiality towards any individuals interviewed during the assurance engagement.

For and on behalf of TUV India Private Limited



Manojkumar Borekar
Product Head - Sustainability Assurance Service
TUV India Private Limited



Date: 16/05/2025
Place: Mumbai, India
Project Reference No: 8123286916