adani

| Growth with Goodness

Adani Enterprises Limited
ESG Factbook 2023-24

|About the **Company**

Adani Enterprises Limited (hereafter referred to as 'We', 'Our', 'AEL', or 'the Company') the flagship company of the Adani Group, is India's largest listed business incubator, dedicated to building and nurturing diverse new businesses across sectors. With a workforce of more than 7,000 full-time employees & workers and total consolidated income of INR 98,282 crore in FY 2024, AEL's current business portfolio spans sectors such as the Airports, Solar Manufacturing, Data Centers, Natural Resources, Aerospace and Defence, Roads and Water.

AEL has a proven track record of successfully incubating businesses such as ports and logistics (Adani Ports), power transmission (Adani Energy Solutions), thermal and renewable power generation (Adani Power and Adani Green), city gas distribution (Adani Total Gas), and food FMCG (Adani Wilmar). These businesses have now become publicly traded entities and market leaders in their respective sectors.

About the ESG Factbook

AEL is pleased to present the Company's ESG Factbook for Financial Year 2023-24. Annually, AEL disclose its financial and sustainability disclosures as well as its performance and accomplishments,

using a comprehensive Integrated Annual Report encompassing the frameworks of GRI, UN SDGs, TCFD, IIRC <IR>, and BRSR. This ESG Factbook is an extension of our Integrated Report FY 2023-24.

Scope & Boundary

The ESG Factbook has been compiled to showcase AEL's ESG performance, encompassing all activities under its operational control and/or majority ownership. This includes Natural Resources, the New Energy Ecosystem (Solar Manufacturing), Roads and Water, the Airport Business, the Data Center Business, and Defence & Aerospace. Please
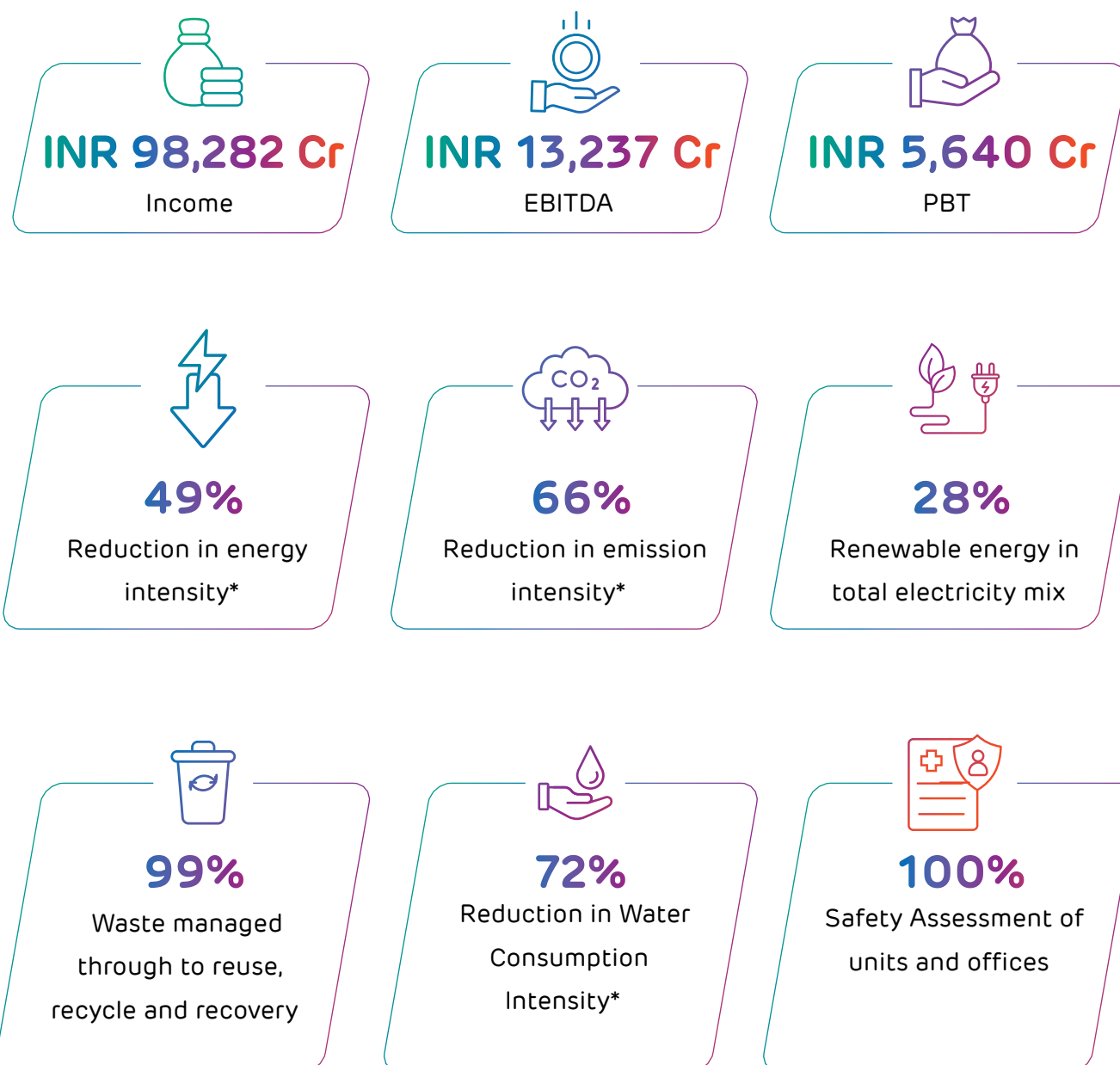
note that throughout this ESG Factbook, FY 2024 refers to the period from April 2023 to March 2024, and similarly, FY 2023 refers to the period from April 2022 to March 2023, and so forth. All the financial figures provided in the document are in Indian Rupees (INR).

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Performance **highlights** FY 2024

INR 98,282 Cr
Income

INR 13,237 Cr
EBITDA

INR 5,640 Cr
PBT

49%
Reduction in energy intensity*

66%
Reduction in emission intensity*

28%
Renewable energy in total electricity mix

99%
Waste managed through to reuse, recycle and recovery

72%
Reduction in Water Consumption Intensity*

100%
Safety Assessment of units and offices

* The targets and the achievements are against the baseline year FY 2021-22. Operational emission, energy and water intensity are calculated on a turnover basis.

ESG **Governance**

AEL-ESG Governance Structure

Board of Directors

- Risk Management Committee (RMC)
- Corporate Responsibility Committee (CRC)
- Corporate Social Responsibility Committee
- Stakeholder Relationship Committee

AEL Sustainability Head

ESG Committee

Business Sustainability Head

- Natural Resources
- Solar Manufacturing
- Airports
- Data Center
- Roads and water
- Defence and Aerospace

Site Sustainability team/Nominated SPOCs

Our ESG and climate-related governance is driven through a structured oversight mechanism at both the board level and management level, ensuring a comprehensive approach to addressing climate-related and ESG issues.

The Corporate Responsibility Committee (CRC) at board level is tasked with overseeing the implementation of critical policies, and it is responsible for monitoring key ESG-related issues such as climate action, energy efficiency, human rights, gender diversity, safety, cybersecurity, etc., its material impact on business and mitigation strategy, ESG targets, and overall ESG plans, processes and performance. The CRC plays an important role in overseeing the implementation of ESG strategy and policies. CRC provides assurance to the Board regarding the progress made by AEL's businesses towards the intended ESG goals and targets.
The Board of Directors, with support from several key committees such as the Corporate Responsibility Committee (CRC), Corporate Social Responsibility Committee (CSRC), Stakeholder Relationship Committee (SRC), and the Risk Management Committee (RMC), monitors the organization's

performance, compliance with standards, and management of risks.

At the management level, the oversight of ESG priorities is integrated across all business areas, from the corporate level down to individual business units. AEL has also established an internal ESG committee, chaired by Chief Sustainability Officer (CSO) and comprising sustainability leads from different businesses, to ensure the effective execution of ESG policies and procedures. This internal committee plays a vital role in aligning business activities with environmental targets, driving minimal impact, and achieving continuous improvement in ESG commitments.

The ESG committee, comprising sustainability heads from various AEL businesses, further strengthens the company's governance on climate-related issues. The ESG Committee is responsible for reviewing performance against environmental and social metrics and shaping AEL's climate strategy at business level. The ESG team works closely with different business functions to support the implementation of the company's ESG agenda.

Environment **Dimension**

At AEL, environmental stewardship is core to our operations, with a focus on resource efficiency, waste reduction & circular economy, and biodiversity preservation, consistently surpassing regulatory standards. The Board of Directors oversees environmental stewardship at the highest level. A key component of this governance is the Board-level ESG committee, recognized as the Corporate Responsibility Committee (CRC), which is constituted entirely of independent directors.

Environmental Policy and Management

We have established a comprehensive set of policies to address various environmental challenges, the policies outline clear roles and responsibilities, emphasizing compliance with environmental laws and regulations. Our Environmental Management System (EMS) integrates these robust policies, controls, and procedures to effectively manage the environmental impacts of all our operational activities.

We also conduct regular training sessions both in-person and online across all levels of the organization, including for the Board and various committees. These training programs aim to enhance awareness of key environmental issues, the impact of operations on the environment, and the latest developments in environmental management practices.

100% of our units are
ISO 14001:2015 certified

Comprehensive set of Environmental Policies:

- ESG (Environment, Social, and Governance) Policy
- Resource Conservation Policy
- Climate Change Policy

- Waste Management Policy
- Environment Policy
- Energy Management Policy
- Water Stewardship Policy
- Biodiversity Policy

Our robust environmental management framework extends beyond mere legal compliance, driving enhanced environmental performance. The company's commitment is reflected in its strong environmental track record, investment in advanced technologies, and focus on innovation and R&D. We are continuously improving our environmental performance, fostering a culture of responsibility among our workforce while collaborating with stakeholders to create a sustainable future for both its communities and the environment.

Zero fines and **penalties** towards environmental non-compliance

Energy Management

Our commitment to energy efficiency is rooted in comprehensive energy management practices. We have dedicated policy for energy management which provide the guidelines to continuously enhance energy performance. We conduct comprehensive energy audits on a regular basis, leveraging both our internal experts and external auditors to identify opportunities for improving energy performance. The energy audits across our facilities are crucial in assessing consumption patterns, identifying potential improvements, and implementing targeted energy-saving measures. The company's energy management systems are aligned with ISO 50001 standards, ensuring a systematic approach to improving energy performance.

Regular energy audits at all business units by internal energy managers and third-party agencies

We have set quantified targets to drive energy savings and continuously evaluate the progress in reducing energy consumption. A key highlight includes the integration of 142 GWh of renewable energy, which now constitutes 12% of its total energy mix.

We actively invest in innovation and R&D to discover new methods for energy reduction and promote the use of clean, green energy. We provide energy management training to our employees, fostering awareness and enabling them to contribute to the increased energy performance across all levels of operations.

28% Renewable energy in total electricity

Energy Targets

Target	Coverage	Progress in FY'24
25% reduction in energy intensity by FY'25	Organization Wide	• Achieved 49% in energy intensity reduction
20% renewable energy in total energy mix by FY'25	Organization Wide	• Achieved 12% of renewable energy in total energy mix
Transition to 100% green electricity by FY'26	Airport	• Achieved transition to 100% green electricity for Mumbai International Airport. • More than 56% energy procured from Renewable Sources across all airports.
15% reduction in energy intensity by FY'28	Mining Services	• Energy intensity per MT of mineral production increased by 21% in FY'24 as compared to FY'22.
5% energy optimisation, considering per MW of module production	Solar Manufacturing	• 7% of energy procured from Renewable Sources. • Decreased energy intensity per crore of turnover by 4%.
Sourcing up to 100% renewable energy for operational sites by 2030	Data Center	• 11.45% of total energy consumed sourced directly from renewable source in FY 2023-24.

Energy Saving Initiatives:

1. Switched to energy-efficient LED lighting, significantly reducing energy consumption and replaced over 1,000 outdated pumps with high-efficiency models and introduced variable frequency drives to save energy and improve water management efficiency at Adani Roads, Metro, Railway and Water (RMRW) business.

2. The transition to Electrically Controlled (EC) fans from traditional AC fans (belt-driven)

contributes significantly to energy conservation and operational cost reduction at Mumbai Airport (Terminal-2).

3. Outdoor duty 6.6kV APFC panel is installed at Suliyari coal mine that has helped reduce the effective HT power consumption and resulting in conservation of energy in mines and affiliated areas. This step has resulted in energy conservation of 95,558.50 units in 5 months.

	Unit	FY 2021	FY 2022	FY 2023	FY 2024	Target FY 2024
Total non-renewable energy consumption	MWh	3,00,441	6,65,057	10,04,790	10,60,260	11,61,138
Total renewable energy consumption	MWh	2,439	4,968	1,50,895	1,41,972	

Emission Management

Our emission management is a key component of our sustainability strategy. We are committed to reducing our carbon footprint through proactive measures aimed at minimizing greenhouse gas (GHG) emissions across all operations. Our decarbonisation efforts are guided by clearly defined targets, and we regularly monitor and report on our progress. By investing in innovative solutions and optimizing energy use, we strive to mitigate our impact on the environment and contribute to global climate action.

Our emission management includes robust data collection mechanisms to track greenhouse gas emissions across operations, ensuring accurate and timely reporting. Our emissions reduction strategies focus on energy efficiency, renewable energy adoption, and operational improvements aimed at minimising our carbon footprint. Additionally, verification mechanisms are in place to ensure data accuracy and compliance, with third-party audits providing external validation of our emissions performance. We provide training programs to raise awareness about emission reduction practices, ensuring that emission management remains a collective responsibility at AEL.

The following section provides information on emission performance, emission reduction and Net Zero targets.

	Unit	FY 2021	FY 2022	FY 2023	FY 2024	Target FY 2024
Total direct GHG emissions (Scope1)	MTCO$_2$e	4,72,445	6,92,537	7,87,145	7,90,770	9,57,337

	Unit	FY 2021	FY 2022	FY 2023	FY 2024	Target FY 2024
Total indirect GHG emissions (Scope 2) – Location Based	MTCO$_2$e	1,02,141	2,14,762	1,90,707	3,37,709	2,15,814
Total indirect GHG emissions (Scope 2) – Market Based	MTCO$_2$e	1,02,141	2,14,762	1,67,163	2,98,876	2,08,916

• Location-based approach: We applied the Central Electricity Authority's (CEA) emission factor, excluding renewable energy sources.

• Market-based approach: We applied the Central Electricity Authority's (CEA) emission factor, including renewable energy sources.

• For the FY 2021 and 2022, since the CEA provided a single emission factor, the market-based and location-based emissions were identical.

	Unit	FY 2022	FY 2023	FY 2024
Total indirect GHG emissions (Scope 3)	MTCO$_2$e	34,49,274	75,56,516	73,24,015

List of Categories	Scope 3 Emissions in the reporting year (MT CO$_2$e)
Cat 1: Purchased Goods and Services	25,53,571
Cat 2: Capital Goods	2,555
Cat 3: Fuel-and-energy-related-activities (not included in Scope 1 or 2)	1,18,041
Cat 4: Upstream transportation and distribution	44,83,707
Cat 5: Waste generated in operations	1,231
Cat 6: Business travel	1,634
Cat 7: Employee commuting	6,638
Cat 8: Upstream leased assets	Not Applicable
Cat 9: Downstream transportation and distribution	99,169
Cat 10: Processing of sold products	1,488
Cat 11: Use of sold products	Not Applicable
Cat 12: End of life treatment of sold products	44,220
Cat 13: Downstream leased assets	11,310
Cat 14: Franchises	Not Applicable
Cat 15: Investments	Not Applicable
Other Upstream	Not Applicable
Other Downstream	Not Applicable

Emission Reduction Targets

At AEL emission reduction is a central focus of our sustainability efforts. The company is committed to minimizing greenhouse gas (GHG) emissions through proactive strategies such as adopting cleaner technologies, improving energy efficiency, and integrating renewable energy sources. With clear emission reduction targets, AEL continuously monitor and optimize its operations to lower our carbon footprint. AEL also invests in innovation and sustainable practices, driving progress toward decarbonisation and contributing to global climate goals.

Coverage	Unit	Emission Reduction Target	Base Year	Progress
Scope 1+2	Organization Wide	25% reduction in emission intensity by FY'25 and 45 % reduction in emission intensity by FY'30	FY'22	Achieved 66% Reduction in operational emission intensity
Scope 1+2	Natural Resources	15% reduction in emission intensity by FY 2027-28	FY'22	Decreased emission intensity per tonne of mineral production by 9%
Scope 1+2	Solar Manufacturing	Annual emission intensity reduction target 10%	Y-o-Y	Decreased emission intensity per crore of turnover by 12%

Climate Action & Net Zero Ambition

Our emission reduction goals leading to Net Zero is well aligned with India's national ambition to achieve net-zero emissions. In this spirit, we aim to reduce our operational Scope 1 and 2 emissions by 100% and reduce Scope 3 emissions for India operations by 40-50% by collaborating with our value chain partners by 2050, reflecting the global commitment under the Paris Agreement to limit global warming to well below 2°C, with efforts towards the 1.5°C target. Our approach is guided by the Science Based Targets initiative (SBTi) Net Zero pathways and the IPCC Scenarios. Our climate-related disclosures follow the TCFD framework, ensuring transparency and accountability in our progress towards a sustainable future.

Leading the Way: Adani Group's Commitment to the WEF 'Transitioning Industrial Clusters' Initiative

Three Adani Group firms have joined the World Economic Forum's 'Transitioning Industrial Clusters' initiative, forming the Adani Mundra Cluster. One of these firms, Adani New Industries Limited (ANIL), is a business vertical of Adani Enterprises Limited. This initiative aims to enhance collaboration and align the vision of co-located companies to drive economic growth, generate employment, and advance decarbonisation by 2050. The Adani Mundra Cluster aspires to become an integrated green hydrogen manufacturing hub, helping to decarbonise the hard-to-abate sectors of the Indian economy and reduce the country's dependency on energy imports.

In one of the largest commitments of its kind globally, a significant USD 100 billion investment has been earmarked for a green transition and transport by 2030. This includes building Integrated Green Hydrogen Ecosystem encompassing three giga factories to develop 10 GW solar panels, 5 GW wind turbines and 5 GW hydrogen electrolysers and expanding the portfolio of Adani Renewables to 50 GW.

Unit	Base Year	Net Zero Target Year	Emission Covered as % of Base Year
Airport	2022	2029	100
Data Center	2024	2030	100
Adani New Industries Limited (ANIL)	2024	2050	100

We strive to achieve **net-zero*** emissions and reduce our **scope 3 emissions** for India operations by **40-50%** from the base year of **2022 by 2050**

*Operational Emissions (Scope 1+2)

Roadmap to Net Zero

1. Establish partnerships and secure renewable energy supplies to increase the share of renewable energy in the Company's operations.

2. Seek green building certifications for Adani data canters, solar facilities and new airport sites, wherever feasible.

3. Implement energy-efficient measures and technologies to reduce energy consumption and emissions across operations.

4. Expand the adoption of electric vehicles (EVs) and establish charging infrastructure to support the transition to a low-carbon transportation fleet.

5. Enhance employee engagement and training programmes to promote climate awareness and sustainability practices.

6. Investment plan of around USD 100 billion across the energy transition value chain by the Adani Group's businesses.

7. Implement advanced renewable energy systems and energy storage systems to optimise energy utilisation.

8. Develop long-term climate resilience plans, including measures to adapt to the impacts of climate change, such as sea-level rise, extreme weather events and water scarcity.

9. Engage in nature-based solutions by supporting reforestation, afforestation and conservation projects to enhance carbon sequestration and biodiversity preservation.

10. Advocate for policies and regulations that support renewable energy development, energy efficiency and sustainable practices at the local, national and international levels.

We will address residual emissions by purchasing carbon credits and investing in permanent carbon removal solutions. At Mumbai International Airport, we actively offset residual emissions by sourcing carbon offsets from credible and verified providers to uphold our ACA Level 4+ certification status.

(Refer page 148-149 of Integrated Annual Report FY'24 for more information on "Strategic Investments" for Decarbonisation)

Climate Risk Assessment

We have conducted a comprehensive Climate Risk Assessment in line with the TCFD framework. This assessment identifies both physical and transition-related climate risks across our operations, offering insights into potential impacts on key assets and value chains. We are actively integrating these findings into our long-term strategy to enhance climate resilience and support sustainable growth.

The scope of our assessment, which includes categories, types of risks, scenarios as per IPCC AR6, stages of the value chain, and time horizons, is outlined in the table below.

Category	Types of Climate-related Risk Covered	Scenario Covered	Value Chain Stages Covered	Time Horizon(s) Covered
Transitional Risk	• Current Regulation • Emerging Regulation • Technology Risk • Legal Risk • Market Risk • Reputational Risk	NGFS scenarios: Net Zero 2050 scenario NGFS scenarios: Current Policies scenario	• The assessment includes our own operations • The assessment includes our upstream activities	1. Short-term 2. Medium-term 3. Long-term
Physical Risk	• Acute Physical Risk • Chronic Physical Risk	RCP 2.6, SSP1, 1.5ºC & below RCP 4.5, SSP2, 2.0ºC - 2.4ºC RCP 8.5, SSP5, 3.0ºC - 3.4ºC		

Climate-Related Management Incentives

Position	Type of Incentive	KPI
Chief Executive Officer	Monetary	Emission Reduction

Description

CEO's incentives are directly tied to achieving climate-related KPIs and KRAs, structured across both short- and long-term performance periods. Annually, the CEO's performance is evaluated based on metrics like emission reductions, energy efficiency, and renewable energy adoption. For instance, a portion of the annual bonus is linked to reducing emission intensity within the fiscal year. Long-term incentives focus on strategic climate goals over 3-5 years, such as achieving 100% renewable energy in data centers by 2030. These incentives, tailored to AEL's diverse sectors, have played a key role in driving successful environmental outcomes, including a 66% reduction in operational emission intensity in FY 2023-24. This clear alignment between performance metrics and AEL's climate transition strategy ensures the CEO's ongoing commitment to the company's sustainability goals.

Position	Type of Incentive	KPI
Chief Sustainability Officer	Monetary	Emission Reduction

Description

Chief Sustainability Officer's (CSO) 10% of the incentive is directly linked to achieving the assigned ESG KPIs. CSO of various business units are responsible for achieving emission reduction and sustainability performance goals as part of their Key Responsibility Areas. Their performance is directly linked to the organization's ESG targets, with annual metrics monitored quarterly. Long-term incentives form a significant part of the CSO's compensation, tied to achieving strategic ESG goals, including climate, waste, water, and biodiversity, over a 3–5 year period. Each business unit sets specific decarbonisation goals aligned with sector benchmarks, cascading these targets down to individual sites. The Board monitors progress quarterly through the Corporate Responsibility Committee (CRC), ensuring alignment with AEL's environmental commitments.

Position	Type of Incentive	KPI
Business Unit Managers	Recognition	Energy Reduction

Description

Business Unit Manager's incentives are evaluated annually and linked to specific environmental targets. Typically, 10-15% of their annual incentive is subjected on meeting operational climate goals, such as reducing energy consumption, improving efficiency, and increasing the use of renewable energy within their unit. These performance metrics are tailored to each unit's operational context, whether in airports, data centers, solar, or mining, and reflect sector-specific climate challenges. The alignment of these incentives with AEL's climate strategy has driven tangible environmental outcomes, ensuring that each business unit contributes effectively to the company's overall sustainability goals.

Internal Carbon Pricing

AEL has implemented an Internal Carbon Pricing (ICP) mechanism with several strategic objectives aimed at enhancing sustainability and driving climate action. This initiative serves to navigate evolving regulations, influence both strategy and financial planning, and promote energy efficiency across the organization. By setting and achieving climate-related policies and targets, AEL utilizes ICP to establish a emission reduction budget and incentivise the integration of climate considerations into decision-making processes.

Additionally, the ICP drives low-carbon investments and facilitates cost-benefit analyses to evaluate the economic implications of carbon emissions. In determining the internal carbon price, AEL aligns its pricing strategy with scientific guidance, the price of allowances under emissions trading schemes, international standards, and the cost of voluntary carbon offset credits.

The pricing framework also considers the implications of carbon taxes and potential carbon border adjustment mechanisms, ensuring a comprehensive approach to carbon management that reflects both regulatory requirements and market dynamics.

Through the implementation of ICP, AEL aims to reinforce its commitment to reducing carbon emissions and enhancing overall environmental performance while supporting the company's long-term sustainability goals.

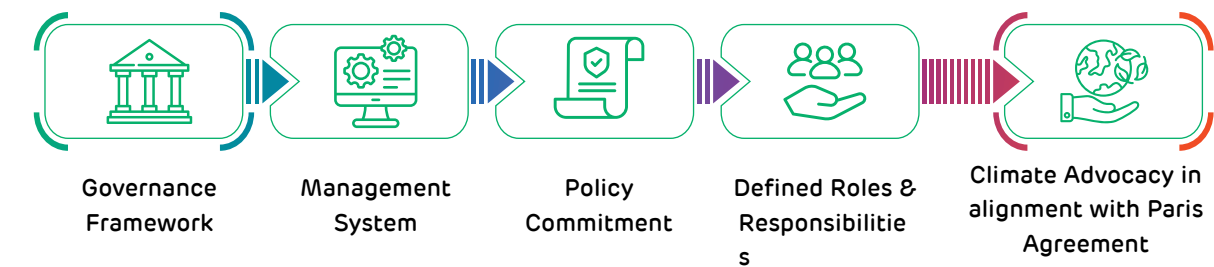| GHG Scope	Type of ICP	Coverage	Price (INR per metric $MTCO_2e$)	Price setting approach
Scope 1+2	Shadow Pricing	Organisation Wide	917	External Approach and Internal Consultation

Note: AEL has set an internal carbon pricing range of 9 to 13 USD per tonne of $MtCO_2e$, with an average price of approximately 9 USD per tonne of $MtCO_2e$.

Climate Related Policy Advocacy

Our commitment to climate-related advocacy is rooted in a robust governance framework designed to engage effectively with public policy. This framework establishes clear accountabilities that extend to the executive level, ensuring that all advocacy efforts align with our corporate values and sustainability goals..

Governance Framework → Management System → Policy Commitment → Defined Roles & Responsibilities → Climate Advocacy in alignment with Paris Agreement

Governance Framework for Public Policy Engagement

We are committed to addressing climate advocacy in alignment with the Paris Agreement through our comprehensive policy on "Responsible Policy Advocacy." This policy outlines essential guidelines for all employees engaged in public policy activities, ensuring responsible and effective engagement with both internal and external stakeholders. By establishing clear expectations and accountability at all levels, we strengthen our dedication to advancing climate-friendly policies and practices.

Through this framework, we aim to shape climate-related policy discussions, advocate for sustainable solutions, and foster collaboration with stakeholders to drive meaningful change in the fight against climate change.

Management System for Advocacy Activities and Trade Association Memberships

Our advocacy approach is built around two primary methods: direct climate-related advocacy and engagement through trade associations.

- **Direct Lobbying Activities:** AEL's CXOs are actively involved in climate-related lobbying efforts that are aligned with the goals of the Paris Agreement. These leaders receive proposed policies directly and provide their insights and recommendations to ensure that our positions reflect the latest advancements in climate science and policy. This proactive

approach facilitates continuous improvement and adaptation of our advocacy strategies.

- **Trade Association Engagement:** In addition to direct lobbying, AEL collaborates with various trade organizations to further our climate agenda. Through these partnerships, we work to amplify our message and advocate for policies that support the objectives of the Paris Agreement. By aligning our efforts with like-minded organizations, AEL strive to influence broader industry practices and standards.

Addressing Climate Policy Position

We recognise the importance of transparency and consistency in our climate advocacy. We have established a clear framework for addressing any misalignments between the climate change policy positions of our trade associations and our own climate commitments. This framework enables us to assess and report on the climate policy positions and activities of these associations, ensuring they are in line with AEL's environmental goals.

We commit to reporting on our climate-related direct advocacy activities through specified communication channels. This commitment to transparency allows stakeholders to understand our advocacy efforts and their alignment with our broader sustainability initiatives.

Waste Management

At AEL, waste management is integral to our commitment towards environmental sustainability. We are committed to responsible waste management through our comprehensive waste management policy. The policy emphasises minimising waste generation, maximising resource efficiency, and promoting the recycling and reuse of materials across all operations. We are dedicated to adopting sustainable waste management practices, aligning with circular economy principles, and complying with environmental regulations. Through continuous improvement and innovation, we strive to reduce our environmental impact and contribute to a cleaner, more sustainable future.

We conduct waste audits regularly to identify opportunities for enhancing waste performance, and action plans then developed to systematically reduce waste generation across operations.

We set quantified targets to minimise waste and rigorously tracks progress to ensure our goals are met. Continuous investment in innovation and
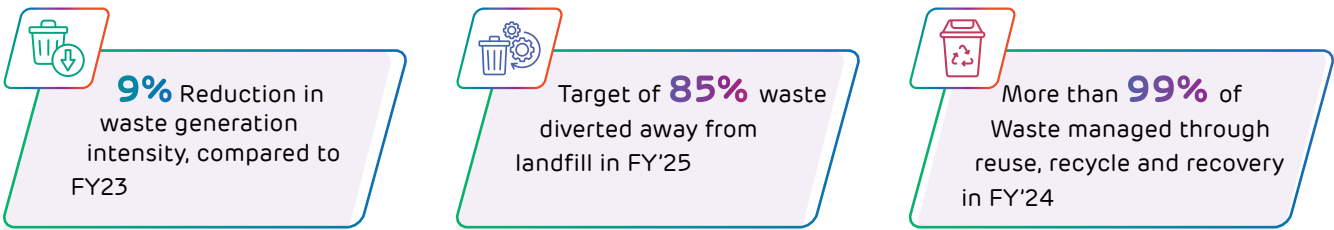
R&D helps us to discover new ways to reduce and manage waste more effectively. We provide waste management training to employees, fostering awareness and promoting responsible waste practices.

Reinforcing the principles of the circular economy, we have integrated recycling programs to minimise the amount of waste sent to landfills. We adopt a comprehensive waste-to-wealth strategy, focusing on converting waste into valuable resources, for example, we diverted 1,109 MT of chemical sludge from Effluent Treatment Plants (ETPs) to other industries for recycling, generating revenue while minimizing environmental impact.

We use Biogas Energy Generation technology at the Sewage Treatment Plant (STP), converting disposable waste into energy. The use of fly and pond ash in road construction highlights our dedication to waste reutilisation and circular economy principles.

9% Reduction in waste generation intensity, compared to FY23

Target of **85%** waste diverted away from landfill in FY'25

More than **99%** of Waste managed through reuse, recycle and recovery in FY'24

Waste Performance

Parameters	Unit	FY 2021	FY 2022	FY 2023	FY 2024	Target FY 2024
Total waste recycled/reused	MT	7,69,13,536	10,00,59,954	10,14,84,115	14,11,72,526	
Total waste disposed	MT	1,606	4,341	25,099	26,555	28,240
Waste landfilled	MT	-	-	5,354	49	
Waste incinerated with energy recovery	MT	12	1	15	-	
Waste disposed other method: Sent to Government authorized waste handlers	MT	1,594	4,340	19,730	26,506	

Waste Management Initiatives:

1. All e-waste, such as batteries and damaged solar panels, are returned to the Original Equipment Manufacturers (OEMs) for repair, refurbishment or material recovery, minimising environmental impact. The Hazardous waste and E-Waste management processes are strictly in compliance with the applicable statutory obligations.

2. Repurpose mining overburden for backfilling, significantly reducing waste and optimising resource use while facilitating mine reclamation efforts.

3. Organic waste is converted into biogas, tapping into its potential as a renewable energy source and contributing to energy sustainability.

4. At Mumbai and Ahmedabad airports, we have installed three Reverse Vending Machines (RVMs) to encourage travellers to recycle their plastic bottles, promoting a culture of recycling among the public.

Water Management

We adopt a proactive approach to water management through continuous assessments, water recycling initiatives, and efficiency improvements. By implementing targeted actions and raising awareness among employees, we strive to reduce water consumption and ensure responsible water stewardship across all operations.

We are committed to sustainable water management by minimising water consumption, optimising water use, and promoting recycling and reuse of water. Our water management policy serves as a guiding document which ensures compliance with environmental regulations while setting clear targets to enhance water efficiency and protect water resources. We regularly conduct detailed water audits, led by our internal experts and external assurance providers, to identify opportunities for optimising water usage and improving overall water management performance.

Water efficiency management is a key aspect of our sustainability efforts. Comprehensive water use assessments is conducted at all locations to identify opportunities for improving water efficiency across all operations. Based on these assessments, targeted actions are implemented to reduce water consumption and continuously work to enhance the quality of wastewater through advanced treatment processes.

We have set clear targets to reduce water use, ensuring that water conservation remains a priority. Water recycling is a fundamental part of our approach, allowing us to minimise freshwater usage by reusing treated water wherever possible. We provide awareness training to employees, promoting active participation in water efficiency management programs and reinforcing our commitment to sustainable water practices.

Target of **15%** reduction in water intensity by FY'25

Achieved **72%** reduction in water intensity by FY'24

Our airport business has carried out detailed third-party water assessments at Jaipur and Mangaluru and internal assessments at all other airports.

Water Saving Initiatives:

1. At Adani Solar, the redirection of RO reject water to construction activities saved approximately 1,200 KL of water per month, offering a cost-effective alternative to using raw water.

2. A 5 KLD Sewage Treatment Plant (STP) was installed at the Talabira II & III Open Cast Project (OCP). This initiative was aimed at treating domestic wastewater effectively, enabling the reuse of treated water for gardening and plantation activities, thereby conserving freshwater resources.

3. In our journey towards sustainable water management, we have adopted zero-liquid discharge (ZLD) systems across our operations, including mining sites and select airports (Ahmedabad, Jaipur, Guwahati, Lucknow, and Mangaluru).

4. Our commitment to water stewardship extends to incorporating extensive rainwater harvesting (RWH) systems within our facilities. This method captures and stores rainwater, addressing various operational needs, such as irrigation, landscaping and facility upkeep.

5. Successful recharge of approximately 1542.1 kilolitres (KL) of rainwater into the groundwater system during FY 2023-24 at Talabira II & III Open Cast Project (OCP).

Water Performance

Parameters	Unit	FY 2021	FY 2022	FY 2023	FY 2024	Target FY 2024
Total Withdrawal (Excluding saltwater)	Million cubic meters	3.22	2.76	7.31	5.30	
Discharge: Water returned to the source of extraction at similar or higher quality as raw water extracted (excluding saltwater)	Million cubic meters	0	0	0.50	0.88	
Total Net Fresh Water Consumption	Million cubic meters	3.22	2.76	6.81	4.42	9.11

Biodiversity

Our environmental stewardship includes a strong focus on the protection and enhancement of biodiversity. We are committed to safeguarding biodiversity and contributing to a nature-positive future on a global scale. We understand the essential role biodiversity plays in sustaining ecosystems where our sites operate and interact with nature.

To align our efforts with the global nature-positive goal, we are in the process of formalizing a Nature & Biodiversity Management Framework at the organizational level. This framework will enable our businesses to align with national and international benchmarks, such as the Indian Business & Biodiversity Initiative (IBBI) and the TNFD framework, ensuring a structured approach to mitigating biodiversity risks and promoting positive outcomes. We are dedicated to maintaining transparency and accountability in our nature-related disclosures, empowering stakeholders to make well-informed decisions.

We also prioritize stakeholder engagement to ensure that diverse perspectives are considered in our decision-making processes. By integrating biodiversity into company's sustainability strategy, we strive to promote healthy ecosystems and contribute positively to the environments in which we operate.

Policy Commitment

A cornerstone of our approach is our Biodiversity Policy, established to guide actions and decisions concerning biodiversity. This policy provides a structured framework for identifying, evaluating and managing biodiversity-related impacts and risks at our project sites.
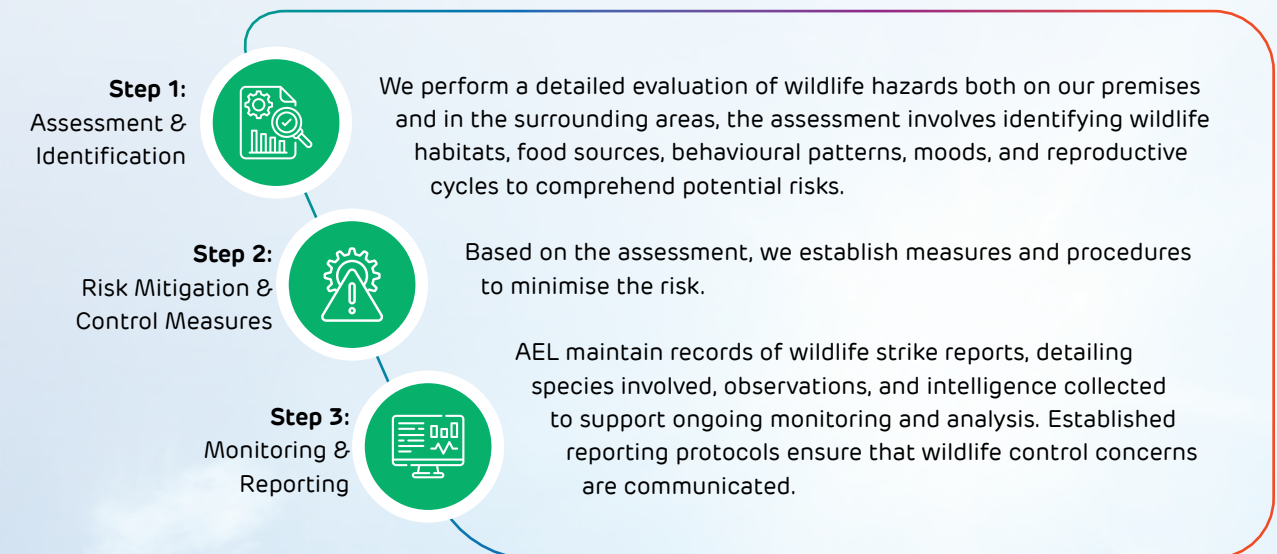
Aims & Objectives

1. "No Net Loss" of biodiversity and encouragement for achieving Biodiversity "Net Positive Impact" at operations which have biodiversity risks.

2. Strive towards integrating a nature-based solutions (NbS) approach to enhance ecosystem resilience and promote sustainable practices across our operations.

3. Overall, strive for having no net deforestation and the implementation of afforestation initiatives.

Risk Assessment

At Adani Enterprises, we integrate Biodiversity Impact Assessment into the Environmental Impact Assessment (EIA) for greenfield and brownfield projects. Prior to project initiation, we conduct baseline studies focused on endangered species, ensuring compliance with national and international standards. We also engage in public consultations to incorporate local stakeholder input.

Independent third-party agencies, accredited by the Ministry of Environment, Forest, and Climate Change (MoEFCC), oversee our assessments for transparency. Tailored biodiversity management plans are developed to mitigate risks, with progress reported biannually to the MoEFCC. This reflects our commitment to minimizing environmental impacts and safeguarding biodiversity for future generations.

Wildlife Hazard Management Plan

Step 1: Assessment & Identification — We perform a detailed evaluation of wildlife hazards both on our premises and in the surrounding areas, the assessment involves identifying wildlife habitats, food sources, behavioural patterns, moods, and reproductive cycles to comprehend potential risks.

Step 2: Risk Mitigation & Control Measures — Based on the assessment, we establish measures and procedures to minimise the risk.

Step 3: Monitoring & Reporting — AEL maintain records of wildlife strike reports, detailing species involved, observations, and intelligence collected to support ongoing monitoring and analysis. Established reporting protocols ensure that wildlife control concerns are communicated.

Biodiversity Initiatives

1. The Adani Group has pledged to grow 100 million trees by 2030 on 1t.org the "Trillion Trees Platform" of the World Economic Forum. As a part of this commitment, AEL has taken an ambitious target to plant nearly 15.4 million trees by 2030.

2. Developed and maintained a mini forest, spanning 10 hectares with 4,000 plants at Jaipur Airport.

3. Managing a 7-acre land within the airport premises, showcasing eco-friendly practices and fostering local flora and fauna at Guwahati Airport.

4. Implemented nature-based solutions for wildlife management within the airport premises. This initiative includes grass species selection, drainage management, and installation of anti-perch devices at Ahmedabad Airport.

5. Parsa East Kente Basan (PEKB) mine has initiated a unique process for effective afforestation in the mining area as 'Sal regeneration' for the propagation of indigenous Sal trees and forest restoration in the area.

(For more detailed information on Biodiversity please refer page 168 to 174 of Integrated Annual Report FY'24 and AEL's Webpage on "Land Use & Biodiversity")

Social **Dimension**

AEL places a strong emphasis on nurturing positive social impact by integrating comprehensive approach into core operations, with a focus on enhancing and strengthening employee relations, upholding human rights, ensuring workplace safety, and fostering community well-being.

AEL actively promotes a diverse and inclusive workplace. With a workforce of 7,176 employees, the company has 9% women employees, aiming to further enhance gender balance across all levels. AEL is dedicated to creating a safe, engaging, and supportive work environment. We provide opportunities for employees to thrive through career development, wellness programs, and open communication channels to foster engagement and job satisfaction. AEL also prioritizes continuous learning and skills development, offering extensive training programs to enhance employees' technical and leadership skills. Safety is a top priority for AEL. The company conducts regular human rights and safety assessments at all its plants and offices, achieving a 100% assessment coverage.

AEL is deeply committed to community development through its social arm Adani Foundation. CSR initiatives have reached over 9.1 million people across 6,769 villages. AEL core focus is on education, healthcare, nutrition, and skill development. Programs like the SuPoshan project have improved the health and nutrition of women and children, while skill development initiatives have empowered thousands of youth.

Comprehensive set of Social Policies:

- Non-Discrimination & Anti-Harassment Policy
- Working Hours Guidelines
- CSR Policy
- POSH Policy
- Employee Grievance Management Policy
- Freedom of Association
- Human Rights Policy

Total Permanent Employee

Parameter	Unit	FY 2021	FY 2022	FY 2023	FY 2024
Employees	Nos.	3,500	4,508	6,005	7,176

Gender Pay Gap

Indicator	Average Women Salary	Average Men Salary
Executive level (base salary only)	1,69,82,000	1,51,46,000
Executive level (base salary + other cash incentives)	1,74,62,000	1,53,31,000
Management level (base salary only)	39,88,000	41,09,000
Management level (base salary + other cash incentives)	40,42,000	41,48,000
Non-Management level (base salary only)	9,25,000	10,35,000

The compensation details provided above have been verified by a third-party agency during the statutory audit.

Workforce Breakdown: Gender

Diversity Indicator	Percentage (%)
Female share of total workforce (%)	9.02
Females in all management position including senior, middle, and junior management position (as % of total management workforce)	7.60
Females in junior management position (as % of total junior management positions)	9.80
Females in top management position, i.e., maximum two levels away from the CEO or comparable positions (as a % of total top management positions)	4.00
Females in management positions in revenue-generating functions (e.g., sales) as a % of all such managers (i.e., excluding support functions such as HR, IT, Legal, etc.)	2.10
Share of women in STEM-related positions (as % of total STEM positions)	6.80

Workforce Breakdown: Nationality

Country wise share in total workforce	Percentage
India	
Share in total workforce	100
Share in all management positions	100

Aiming to have **10%** women representation by FY 2028.

Human Rights

AEL is deeply committed to upholding and promoting human rights across all its business sectors. The company's human rights approach is embedded in its corporate culture and operational practices, ensuring that respect for human rights is fundamental to its values. AEL actively fosters a culture of accountability and continuously works to improve its human rights performance, both within the organization and in the communities where it operates.

1. AEL ensures safe and equitable work environments, strictly adhering to labour laws and regulations. The company stands against forced labour, child labour, and all forms of discrimination.

2. Through its Supplier Code of Conduct, AEL enforces human rights standards throughout its supply chain, engaging only with partners who uphold the same principles.

3. AEL operates with full respect for community rights, including cultural heritage, land rights, and livelihoods, ensuring transparent and respectful interactions with local communities.

4. AEL promotes a diverse and inclusive workplace, ensuring fair treatment and equal opportunities for all, while combating discrimination based on race, gender, religion, disability, or sexual orientation

Human Rights Due Diligence

AEL employs a comprehensive due diligence process to identify, assess, and mitigate potential human rights risks. This includes proactive risk assessments within its operations, supply chain, and in new business relationships. The company monitors and addresses risks related to forced labour, child labour, freedom of association, and discrimination, ensuring compliance with international human rights standards like the Universal Declaration of Human Rights and ILO conventions.

AEL is committed to educating its workforce on human rights through mandatory training, including topics like the Prevention of Sexual Harassment (POSH) and maintaining a respectful and non-discriminatory work environment. Continuous human rights training and assessments across all offices and units ensure ongoing compliance and awareness.

Human Rights Assessment

We regularly conduct Human Rights Assessments across its own operations, joint ventures, and tier 1 suppliers. These assessments are carried out with the support of third-party experts and internal subject matter specialists to ensure a comprehensive evaluation of potential risks and compliance with human rights standards.

The table below outlines the scope, coverage, and outcomes of these risk assessments.

Sr. No.	Category	Coverage	% of total assessed where risks have been identified	% of risk with mitigation actions taken
1.	Own Operation	100%	Nil	NA
2.	Joint Ventures	100%	Nil	NA

All Tier 1 suppliers have confirmed their compliance with key human rights aspects by formally acknowledging AEL's Supplier Code of Conduct.

Human Rights Mitigation

AEL takes a proactive approach to identifying and mitigating human rights risks, particularly in new business relationships such as mergers, acquisitions, and joint ventures. As part of its comprehensive human rights due diligence process, AEL systematically evaluates potential human rights risks in all new business engagements to ensure alignment with its ethical standards and human rights commitments. This ensures that all partners and acquisitions uphold similar values involving labour rights, community engagement, and non-discrimination.

Before entering mergers, acquisitions, or joint ventures, AEL conducts thorough human rights assessments to identify any potential risks related to forced labour, child labour, freedom of association, and discrimination. This due diligence ensures that new business partners align with AEL's human rights standards, safeguarding the company's commitment to ethical practices across its expanding operations.

AEL regularly updates and reviews its human rights risk mappings across all areas of its operations and supply chain. These systematic reviews are essential for identifying emerging risks and addressing ongoing human rights concerns. By consistently monitoring potential human rights issues, AEL ensures continuous improvement and compliance with international frameworks such as the Universal Declaration of Human Rights and the ILO conventions.

AEL adopts a proactive and comprehensive approach to addressing human rights risks, focusing on identification, prevention, and remediation. The company ensures that any human rights issues, whether within its operations or supply chain, are swiftly and effectively mitigated through well-defined corrective actions.

Human Rights Remediation

AEL has established accessible grievance mechanisms and has a clear process in place for addressing human rights violations or risks. When potential or actual issues, such as forced labour, child labour, discrimination, or violations of labour rights, are identified, the company takes immediate remediation action.

These actions include:

1. Detailed investigations into any reported violations, ensuring timely and fair resolution. Working with affected stakeholders to implement corrective actions, which may include improved working conditions, addressing grievances.

2. Remediation also includes conducting additional training programs.

Freedom of Association

AEL's engagement strategy is centerd on the principles of freedom of association and collective bargaining. AEL recognize that freedom of association and the right to collective bargaining are fundamental principles that empower workforce and foster a positive work environment. Company's engagement strategy focuses on actively collaborating with various stakeholders to promote the wellbeing and professional growth of our employees.

At AEL, 100% of workforce is covered by various committees established within the company. These committees serve as vital forums for collective bargaining, allowing employees to discuss their concerns. This structure ensures that all employees have a voice and the opportunity to participate in discussion which address their concerns.

Human Capital Management

At Adani Enterprises Limited (AEL), training and development are integral components of our commitment to fostering a high-performance culture and enhancing employee capabilities. Our training programs are designed to equip employees with the necessary skills and knowledge to excel in their roles and adapt to the evolving demands of the industry.

Our Learning and Organization Development (L&OD) initiatives adhere to the 70:20:10 principle of adult learning, where 70% of learning is experiential, 20% comes from collaborative projects, and 10% is delivered through formal training. To facilitate flexible learning, we leverage our digital platform, e-Vidyalaya Percipio, allowing employees—especially those in remote locations—to access learning resources at their convenience. Additionally, our "Digital Dexterity" initiative promotes a digital mindset, equipping employees with critical skills in areas such as customer-centric innovation and data-driven decision-making.

We collaborate with globally renowned educational institutions to curate our training programs, ensuring they remain at the forefront of industry standards. Our curriculum encompasses a wide range of subjects, including Strategy, Finance, Design Thinking, and Environmental, Social, and Governance (ESG) practices, and is periodically revised to remain relevant.

Mentorship and coaching are also central to our development strategy. Senior leaders play a crucial role in mentoring team members, using their insights into organizational priorities and individual motivators to guide career progression. This comprehensive approach to training and development fosters a culture of continuous improvement, leadership development, and employee engagement, strengthening AEL's commitment to empowering its workforce.

Indicator	Values
Average hours per FTE of training and development FY 2023-24	30
Average amount spent per FTE on training and development FY 2023-24 in INR	10,000

Type of Trainings

Gender	Total Training Hours	Safety Training	Human Rights Training	Skill Upgradation & Other Training
Male	1,90,470	4,458	4,662	1,81,350
Female	18,150	294	69	17,787

Hiring

At AEL, we recognize that effective talent attraction and retention are crucial for achieving sustainable growth and maintaining a competitive edge in the industry. Our strategy focuses on attracting high-caliber talent, nurturing their development, and fostering long-term commitment to the organization. To draw exceptional candidates, we employ diverse recruitment channels, including direct sourcing through our Adani Career webpage, social media platforms for employer branding, online job portals for wider access to potential hires, and recruitment consultants for niche skill sets.

We also leverage professional networks, campus hiring programs, employee referrals in our recruitment strategy. Furthermore, we promote internal job postings (IJP) to facilitate career progression within our workforce, ensuring that our employees have opportunities to advance or transition to more fulfilling roles.

During the reporting period, we hired 1,901 new employees, reflecting our commitment to growth and talent development. Additionally, we successfully filled 10% of our positions from our internal talent pool, reinforcing our dedication to employee skill-building and career advancement. By cultivating an environment that supports talent development and recognizes achievements, AEL aims to enhance innovation, productivity, and long-term employee engagement.

Particulars	FY 2021	FY 2022	FY 2023	FY 2024
Total number of new employee hires	385	2,948	2,705	1,901
Percentage of open positions filled by internal candidates	25	04	10	10

Hiring Breakdown in FY'24

Category	Age Group			Gender	
	<30	30-50	>50	Male	Female
Non-Management	468	232	00	619	81
Junior Management	299	472	06	684	93
Middle Management	16	312	18	329	17
Senior Management	01	39	38	74	04

Performance Appraisal

AEL implements individual-based performance appraisals through Performance Management System (PMS). The system includes Management by Objectives (MBO), where clear goals and expectations are set for each employee, followed by regular check-ins and reviews to assess their performance and contributions. This ensures that each individual's impact is aligned with the company's objectives. In addition, AEL fosters Agile Conversations for Performance Appraisal through frequent dialogues on career progression, feedback, and development plans.

These conversations help employees continuously adapt and grow in response to evolving business needs.

AEL conducts mid-year check-ins and annual reviews to analysis defined goals and expectations, ensuring that employees' performance is evaluated at least twice a year. This comprehensive process supports timely recognition, promotions, and development planning based on individual achievements and needs for improvement.

Long-term Incentive

At AEL, employees across all management bands including middle and junior are incentivised through a structured approach that combines both annual targets and long-term performance metrics, with the latter spanning a 3- to 5-year timeframe. Reporting managers regularly, typically quarterly, review the progress of each eligible permanent employee's annual and long-term KPIs. They establish action plans to ensure targets are met, and upon successful achievement, the company rewards individuals in accordance with its incentive policy.

Aligning Long-Term Incentives with Sustainability Goals

AEL, along with its key business verticals such as Natural Resources, Airports, Solar Manufacturing, and Data Centers, has established a range of sustainability targets. These targets include decarbonisation, renewable energy integration, energy and water efficiency, circularity, and certifications like green building standards and management systems.

In alignment with the timeframe for these sustainability goals, respective departments and individuals set their KPIs, incorporating annual milestones to track progress. As the company moves toward achieving these targets, individual employees are incentivised accordingly, based on their contributions to meeting the set milestones.

Employee Well-being Programs

AEL fosters a highly engaging work environment through a comprehensive Employee Engagement Strategy designed to motivate, support, and connect its workforce. We offer various initiatives to enhance employee engagement and promote a sense of belonging

Mental & Physical Wellbeing

- **Fitness and Wellness Programs:** Encouraging physical fitness and well-being through online as well as in-person Yoga & fitness classes, sports facilities, wellness challenges, and access to health re-sources.
- **Mental and Emotional Wellbeing:** Recognising the importance of mental health in the workplace, we support our employees' emotional wellbeing through our Wellness program, and other Adani Cares initiatives.

Work Conditions

- **Flexible Working Hours:** We offer flexible working hours to help employees manage their personal and professional commitments efficiently.
- **Work-from-Home Arrangements:** Remote work options are available as needed, prioritizing employee health and work-life balance.

Family Benefits

- **Paid Parental Leaves:** We provide paid parental leave to both primary and non-primary caregivers, providing 26 weeks of leave for the primary caregiver and 1 week for the non-primary caregiver.
- **Childcare Facilities:** We prioritize the well-being of our employees by providing childcare facilities, including a crèche, at our all business units, and corporate offices. This initiative reflects our commitment to fostering a family-friendly workplace and supporting our employees' well-being.
- **Other Leaves & Benefits:** In addition to parental leave, we offer a range of other leave benefits to employees to support their family's wellbeing. We also provide regular health check-ups and extensive health insurance that covers employees and their families.

Employee Turnover Rate

The total employee turnover reflects the percentage of all employees who leave the organization within a given period, combining both voluntary and involuntary exits. Since AEL experienced only voluntary exits, such as resignations or retirements, the voluntary employee turnover rate is the same to the total turnover rate.

Particulars	FY 2021	FY 2022	FY 2023	FY 2024
Total employee turnover rate	14.33	13.26	13.57	15.90
Voluntary employee turnover rate	14.33	13.26	13.57	15.90

Category	Gender	Percentage	Indian Nationality
Total Employee Left	Male	15.29%	100%
	Female	22.31%	100%
Total Employee Left Voluntary	Male	15.29%	100%
	Female	22.31%	100%

Employee Satisfaction

AEL is committed to fostering a highly engaging and supportive work environment, designed to motivate employees and encourage long-term retention. The company regularly conducts engagement surveys to assess employee satisfaction. To ensure a thriving work environment, AEL conducts regular engagement surveys to gauge job satisfaction, purpose, happiness, and stress levels. These surveys offer a comprehensive view of employee sentiment and engagement across different aspects of the organization. By analysing the survey results, the company gains valuable insights into overall employee morale and identifies areas for potential improvement. The company uses the feedback to continuously enhance employee satisfaction.

Occupational Health & Safety

Our approach to Occupational Health and Safety (OH&S) is rooted in a proactive philosophy that integrates safety into every aspect of our decision-making and planning processes. We conduct comprehensive risk and hazard assessments to identify potential workplace hazards, prioritizing these risks and integrating action plans with quantified targets to effectively address them.

Our procedures include investigating work-related injuries, illnesses, and incidents to identify improvement areas. OHS criteria are also embedded in our procurement and contractual requirements, reinforcing our dedication to a culture of safety excellence and continuous improvement across all business sectors.

Our commitment towards health & safety extends to:

- Preparing emergency situations by integrating responsive actions within our Safety Management System (SMS) delineating clear accountability across our organizational structure.

- Regularly evaluating our progress in reducing health risks against established targets through internal inspections and independent external verification using ISO 45001 standards.

- Consultation with and participation of workers during stakeholder interaction to address their safety concerns.

- Setting up prioritisation and action plans. Providing robust OHS training to employees and relevant stakeholders to raise awareness and minimise incidents.

Safety assessment of **100%** of units and offices in alignment with ISO 45001

Fatalities

Particulars	Unit	FY 2021	FY 2022	FY 2023	FY 2024
Employees	Number	0	0	0	0
Contractors	Number	0	0	1	4

LTIFR

Particulars	Unit	FY 2021	FY 2022	FY 2023	FY 2024
Employees	n/ million hours worked	0	0	0	0.04
Contractors	n/ million hours worked	0	0.076	0.141	0.03

Customer Engagement

At AEL, our commitment to customer satisfaction is central to our operations, focusing on value enhancement through competitive pricing, sustainable practices, and active incorporation of customer feedback. We critically evaluate feedback and improvement suggestions, ensuring our customers are well-informed about our sustainable practices and policies. Our goal is to deliver services that not only align with our sustainability objectives but also enhance overall customer satisfaction.

AEL employs a QR Code-Based Feedback Management System to continuously capture customer feedback in real-time at airports, allowing passengers to easily share their experiences. This system ensures that customer voices are heard and acted upon promptly, with negative feedback triggering immediate tasks within the airport's management system for swift corrective actions. The ongoing collection of feedback enhances service quality and customer satisfaction while supporting AEL's commitment to value enhancement through competitive pricing and sustainable practices.

Moving forward, AEL plans to integrate insights from the feedback into its operational strategies, including the use of an AI-Enabled Passenger Flow & Queue Management System, which provides real-time data on passenger movements and optimizes staffing and resource allocation. This comprehensive approach not only aims to reduce congestion but also ensures that AEL consistently meets its sustainability objectives while elevating the overall customer experience.

Satisfaction Measurement	Unit	FY 2021	FY 2022	FY 2023	FY 2024	Target FY 2024
Percentage of satisfied customer	Percentage	92	92.08	98	98	99

| Governance **Dimension**

AEL is guided by a robust governance framework that emphasizes accountability, transparency, and ethical conduct. The company operates under a one-tier Board system, where the Board of Directors plays a pivotal role in steering corporate priorities. The Board is committed to upholding the highest standards of ethics and integrity, with each Director pledging to adhere to the 'Code of Conduct' and company policies, ensuring that their actions reflect the company's core values.

AEL also prioritizes responsible conduct, focusing on the company's broader role in contributing positively to the environment, communities, and society at large. This responsibility goes beyond compliance with laws and regulations, aiming for the company to emerge as a responsible corporate entity. Accountability and transparency are further reinforced through comprehensive financial and non-financial reporting, following best practices and governance procedures that include internal and external assurance.

Key pillars of AEL's corporate governance philosophy include the accurate and timely dissemination of corporate, financial, and operational information to stakeholders, allowing the Board to guide strategic decisions effectively.

The Board oversees governance through specialized sub-committees focusing on areas such as Audit, Risk Management, Human Resources, ESG, and Corporate Social Responsibility. AEL also maintains compliance with all relevant laws and fosters a clear governance structure with a diverse Board and management team. Its robust risk management framework and adherence to the Code of Conduct ensure that decisions are made with transparency and based on well-informed judgments. The Board maintains active oversight of the company's business strategy, major developments, and key activities, ensuring that AEL operates with integrity and in line with its corporate values.

As mentioned in the corporate governance section of Integrated Annual Report FY 2023-24, total number of meetings held during the tenure was six, out of which attending minimum one meeting is mandatory in a year as per Company's Act 2013. Thus, the minimum meeting attendance requirement for FY 2023-24 was 16.67 %, against which the average board meeting attendance for AEL was 98.14%.

Comprehensive set of Governance Policies:

- Board Diversity Policy
- Code of Conduct for Directors and Senior Management
- Code of Conduct for Employees
- Remuneration Policy
- Directors Familiarisation Program
- Whistle Blower Policy
- Responsible Advocacy Policy
- Stakeholder Engagement Policy
- Supplier Code of Conduct
- Cybersecurity & Data Privacy Policy

Materiality Assessment

AEL's Materiality Assessment was conducted in accordance with guidance from key standard-setting bodies, including the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB), and the Integrated Reporting Framework, covering both general and sector-specific standards. Our materiality assessment is integrated into the company's ERM process and has been verified by a third-party assurance provider. The materiality assessment process is depicted below:

Defining Purpose and Scope → Identifying and Categorising Potential Topics → Evaluating the Importance of the Topics → Prioritisation of the Topics → Engaging the Management & Seeking Stakeholder Feedback → Material Topics

For the effective management of key material issues, we have disseminated a detailed strategy, and the company's management has linked the compensation of top executives (i.e., Business CEOs, Unit Heads, and other relevant CXOs). Their incentive is directly tied to the performance on the top material issues presented in the table.

Energy & Emission Management
- Integration of energy efficiency programs.
- Integration of renewable energy into the total energy mix.
- Reduction in energy consumption.
- Implementation of decarbonisation strategies.

Employee Health & Safety
- Zero work-related incidents.
- Training on health and safety.
- Compliance with safety protocols and SOPs.
- Implementation of a contractor safety management system.

Human Rights
- Zero human rights violations.
- Training on human rights principles.
- Implementation of the code of conduct.
- Human rights assessments.

(For more information on materiality, please refer page 52-59 of our Integrated Annual Report FY'24)

Risk Management Governance and Process

Under the Risk Management Framework, the Company has constituted a Risk Management Committee (RMC) with the objective to outline and implement and monitor the risk management plan for the Company and to continuously monitor, report and mitigate various risks.

Risk Management Committee

Business Level Risk Management

Unit Level Risk Management

Business Level

At the business level, AEL integrates risk management into its strategic planning and decision-making processes. Business-level risk management also involves developing long-term risk mitigation strategies.

The outcome of this monitoring is reported to the Audit Committee and to the Board on a quarterly basis. The RMC is responsible for reviewing the risk management plan and ensuring its effectiveness.

Risk Management Process Audit

Internal Audit is carried out in accordance with auditing standards to review effectiveness of internal control system & procedures to manage risks, compliance with relevant policies & procedure and to recommend improvement in processes and procedure. The Audit Committee of the

Unit Level

AEL focuses on identifying operational risks specific to each business unit's day-to-day activities. Each unit is responsible for conducting regular risk assessments that target potential operational, environmental, and safety risks. Unit-level risk management teams are equipped to monitor risks closely and take immediate corrective actions when necessary.

The Audit Committee has an additional oversight in financial risks and controls. The risks identified by the businesses are systematically addressed through mitigation actions on a continual basis.

Board regularly reviews execution of Audit Plan, the adequacy & effectiveness of internal audit systems, and monitors implementation of internal audit recommendations including those relating to strengthening of Company's risk management framework.

Risk Review

AEL employs a thorough risk review process to monitor and manage its exposure to various risks, ensuring that the likelihood and potential impact of these risks are clearly understood and addressed across all business operations. This approach integrates company-specific risk assessments with strategic mitigation actions.

Adani Enterprises Limited (AEL) has conducted a comprehensive assessment to identify key risks across Environmental, Social, and Governance (ESG) dimensions. These identified risks provide the company with a clear understanding of its risk exposure, factoring in both the likelihood of occurrence and the potential magnitude of their impact on business operations. For each of these risks, AEL formulates a mitigation strategy tailored to reduce or manage the specific threats.

Risk Appetite

Once the mitigation measures are implemented, AEL evaluates the remaining level of risk, known as residual risk. This residual risk, which persists despite the mitigation efforts, is then considered the company's risk appetite for the identified risks. By defining its risk appetite AEL ensures that it strikes a balance between managing risks effectively and maintaining flexibility to pursue opportunities within acceptable risk thresholds. This approach allows the company to prioritize resources toward the most critical risks while ensuring that it operates within its strategic objectives and tolerance for risk.

Risk Culture

Regular risk management education for all non-executive directors	Focused training throughout the organization on risk management principles	Incorporation of risk criteria in the development of products and services
As part of familiarisation program, the Independent Directors of the Company participate in the Directors' Engagement Series, where the Independent Directors are apprised about critical topics such as • Global trends in the domain of ESG • Capital Markets • Risk Management • Credit Profile • Financial Controls • General awareness about other Adani portfolio companies and key developments.	• AEL prioritises the importance of risk management across all levels of the organisation by implementing comprehensive training programs for all employees. • The training sessions are designed to enhance awareness and understanding of risk management principles, ensuring that each team member is trained and made aware of the necessary knowledge to identify, assess, and mitigate risks effectively.	Risk management is embedded into the development of products and services to ensure that all potential risks are assessed and addressed from the outset. During the design and development phases, we incorporate various risk criteria, including • Environmental • Social • Regulatory • Operational risks, etc. These criteria are to ensure that the products and services are not only innovative but also resilient to potential threats.

Financial incentives which incorporate risk management metrics

• AEL links financial incentives to its risk management framework by incorporating risk-related metrics into performance assessments and reward systems. This ensures that management and key employees are aligned with the company's overall risk management goals, encouraging them to adopt responsible practices that mitigate potential risks in their operations.

Emerging Risks

Risk 1 Technological Disruptions

Risk 2 Cybersecurity

Risk 1 — Technological Disruptions

Description

The rapid pace of technological advancement is creating a significant risk of stranded assets, as older systems and technologies quickly become obsolete. As industries evolve, businesses must keep up with innovation or risk being left behind by more advanced competitors. AEL operates in sectors such as solar manufacturing, which is continuously evolving with new technologies and innovations. Additionally, AEL's involvement in the airport industry exposes the business to risks related to technological outages in critical operating systems, an issue that has recently caused widespread concern across airports globally.

Impact

The failure to keep pace with technological advancements or to manage system disruptions could have severe consequences for AEL:

- **Operational Downtime:** In the airport sector, system outages could lead to disruptions in services, impacting passenger experience and leading to significant operational delays.
- **Stranded Assets:** Outdated technology in sectors like solar manufacturing could result in stranded assets, forcing costly upgrades or replacements to remain competitive.
- **Competitive Disadvantage:** Falling behind in technological innovation could put AEL at a competitive disadvantage, affecting market share and profitability.

Mitigation Action

- **Proactive Technological Upgrades:** AEL continuously monitors technological trends in its sectors and invests in upgrading systems and infrastructure to avoid obsolescence, ensuring that our assets remain efficient and competitive.
- **Resilient Systems:** We are investing in resilient and secure to prevent outages, ensuring smooth operations and minimizing disruptions.
- **Risk Management and Contingency Planning:** AEL implements comprehensive risk management strategies, including contingency planning, to prepare for potential system disruptions and quickly address any operational challenges that may arise.
- **Cross-Sector Innovation Monitoring:** A dedicated team is focused on cross-sector technological advancements, ensuring that AEL remains at the forefront of innovation in both the solar and airport industries.

Risk 2 — Cybersecurity

Description

With the rapid advancement of technology, including automation through IoT, AI, and other interconnected systems, the number of potential entry points for cyberattacks has significantly increased. This growing interconnection poses a increased risk of system-wide failures if targeted by attackers. For AEL, cybersecurity is particularly crucial as our business verticals are continuously automating processes to enhance efficiency and optimization. Protecting these digital infrastructures is vital to ensure the smooth functioning of our operations and the safety of our data.

Impact

Without robust cybersecurity measures, AEL faces several potential risks:

- **Operational Disruptions:** Any cyber threat could hinder the timely delivery of products and services to our primarily B2B clients, damaging business continuity.
- **Trust and Reputation:** A security breach could lead to a loss of trust among customers and stakeholders, negatively affecting future business prospects.
- **Financial Loss:** The costs associated with securing the system, recovering compromised data, legal proceedings, compensation, and system maintenance would result in significant financial impact.

Mitigation Action

- **Governance:** AEL has established an Information Technology & Data Security Committee, primarily comprising independent directors. Dr. Vinay Prakash, with over 20 years of experience in digitalisation, plays a key role in overseeing cybersecurity efforts.
- **Certification and Audits:** Continuous improvements are made to our information management systems, along with regular third-party audits for ISO 27001:2013 certification to ensure compliance with the highest security standards.
- **Employee Training:** AEL provides mandatory cybersecurity training to all employees to ensure they understand and adhere to best practices.
- **Awareness and Updates:** Regular updates and communications on emerging cybersecurity threats help keep the organization vigilant and prepared against potential attacks.

Business Ethics

AEL is committed to upholding the highest standards of business ethics across all its operations. Pivotal to this commitment is the Code of Business Conduct and Ethics (the "Code"), established by the Board for all Board Members and Senior Management. This Code outlines the principles of integrity, transparency, and accountability that guide AEL's decision-making processes.

All Board Members and Senior Management Personnel have affirmed their compliance with the Code, and a declaration to this effect, signed by the Managing Director, is attached to the company's report. The Board has also adopted a separate Code of Conduct specifically addressing the duties of Independent Directors in line with the provisions of the Companies Act.

These ethical guidelines ensure that AEL's leadership is held to the highest standards of professionalism and responsible conduct. Through these measures, AEL fosters a corporate culture where ethics and compliance are integral to business operations, reinforcing trust and responsible behaviour among its stakeholders.

AEL has established a Code of Conduct for its employees, designed to promote ethical behaviour, integrity, and compliance across all levels of the organization. This Code outlines the expected standards of conduct for employees in their day-to-day operations, emphasizing honesty, fairness, and responsibility.

Codes of Conduct: Systems/Procedure

At AEL, establishing a strong foundation for ethical behaviour is a priority. Every new employee is required to commit to the company's Code of Conduct upon joining. To ensure continuous adherence, AEL conducts mandatory training sessions for all employees, reinforcing their understanding of the Code's principles and guidelines. The Code of Conduct covers a wide range of critical aspects of professional behaviour, including information security, anti-corruption and anti-bribery practices, promoting non-discrimination and preventing harassment, guidelines for political and charitable activities, maintaining health, safety, and environmental standards, managing conflicts of interest, and general conduct in daily duties.

100% of employees are provided with comprehensive training on the Code of Conduct. Through regular training, clear governance structures, and a commitment to responsible conduct, AEL continues to embed business ethics as a cornerstone of its corporate culture.

To further strengthen ethical practices, adherence to the Code of Conduct is evaluated during the annual performance review process, ensuring compliance is integral to employee assessments. Employee remuneration is directly linked to compliance, with violations impacting compensation. This comprehensive system promotes accountability and transparency across the organization, ensuring AEL operates with the highest ethical standards.

> During the fiscal year 2023-24, AEL made no charitable donations, sponsorships, or financial contributions to political parties or individuals or organizations linked to political parties.

Mechanisms for Reporting and Ensuring Compliance with the Code of Conduct

AEL has established robust mechanisms to ensure the effective implementation of its Code of Conduct. Employees can raise concerns through the company's Whistle Blower Policy, which provides multiple secure channels for lodging a Protected Disclosure. Employees can either send an email to whistleblower@adani.com or submit a written letter to the Chairman's Office in Ahmedabad, ensuring confidentiality and protection. These mechanisms, including dedicated help desks and secure reporting channels, foster a transparent and accountable work environment, enabling employees to report unethical practices without fear of retaliation.

Reporting on breaches

Particulars	FY 2024
Corruption & Bribery	0
Discrimination & Harassment	2
Customer Privacy Data	0
Conflict of Interest	0
Money Laundering or Insider trading	0

Policy Influence

At AEL, advocacy plays a crucial role in ensuring that our perspectives are communicated and considered by policymakers. We primarily conduct our advocacy efforts through trade associations, which represent the interests of various industries and sectors we operate in. However, in cases where trade associations are either inactive or unable to meet our expectations.

We view it as both our duty and responsibility to provide input on laws, regulations, and policies that may affect our business operations. These engagements are always in line with AEL's Code of Conduct and governed by our Policy on Responsible Advocacy, ensuring transparency, ethical conduct, and alignment with our corporate values. Through these efforts, AEL aims to contribute constructively to policy discussions that shape the regulatory environment in which we operate.

Particular	FY 2021	FY 2022	FY 2023	FY 2024
Lobbying, interest representation or similar	0	0	0	0
Local, regional or national political campaigns / organizations / candidates	0	0	0	0
Trade associations or tax-exempt groups (e.g. think tanks)	50,32,925	2,88,53,963	60,89,985	2,06,59,730
Other (e.g. spending related to ballot measures or referendums)	0	0	0	0
Total contributions and other spending	50,32,925	2,88,53,963	60,89,985	2,06,59,730

Name of Organization	AEL's Engagement
Green Hydrogen Organisation	AEL supports Green Hydrogen Organisation's (GH2) mission to promote green hydrogen as a sustainable global energy source. We recognize its crucial role in the global energy transition. Our collaboration with the council and its members focuses primarily on using renewable energy for hydrogen production, aligning with the council's goals. Key initiatives include manufacturing electrolysers, producing Green Ammonia, and building a large-scale compressed green hydrogen facilities. Annual Contribution: INR 68,00,000
Global Renewables Alliance	AEL supports the Global Renewables Alliance's mission to accelerate the transition to renewable energy. We recognize the vital role of clean energy in combating climate change and driving sustainable development. As a key player in India's energy sector, we back the Alliance's goals of decarbonisation global economies through collaboration. AEL engages in Alliance-led forums, sharing expertise in renewable energy and innovative power solutions. Annual Contribution: INR 90,00,000
Confederation of Indian Industry	AEL engages with the Confederation of Indian Industry (CII) through forums, knowledge-sharing sessions, policy discussions, and industry events. On the sustainability front, we actively contribute to discussions on the Indian Sustainability Disclosure Standards released by SEBI. We submitted our comments to CII, advocating for sector-specific sustainability disclosure standards to better address the unique needs of each sector, rather than a common standard for all. Annual Contribution: INR 11,17,800

Information Security & Cybersecurity

Adani Enterprises Limited (AEL) adopts a comprehensive approach to IT and cybersecurity, focusing on two key areas: enhancing the resilience of IT systems and proactively managing information security incidents. We are committed to continuously assessing our incident response capabilities to ensure swift action and minimal operational disruption. Our objective is to strengthen the resilience of our digital infrastructure while enhancing information security protocols.

AEL has established a three-tier cybersecurity governance model, and the company has achieved ISO 27001 certification, demonstrating adherence to the Information Security Management System standard. The company also upholds business continuity and contingency plans, which are regularly subjected to manual testing by IT representatives. Furthermore, AEL collaborates with third-party agencies to conduct vulnerability assessments.

Zero (0) breaches related to IT Security, Cybersecurity and Data Privacy

100 % units are certified with **ISO 27001**

IT Security and Cybersecurity Governance

Board Level
Information Technology & Data Security Committee

Business Level
IT Security & Cybersecurity Governance

Unit Level
IT Security & Cybersecurity Governance
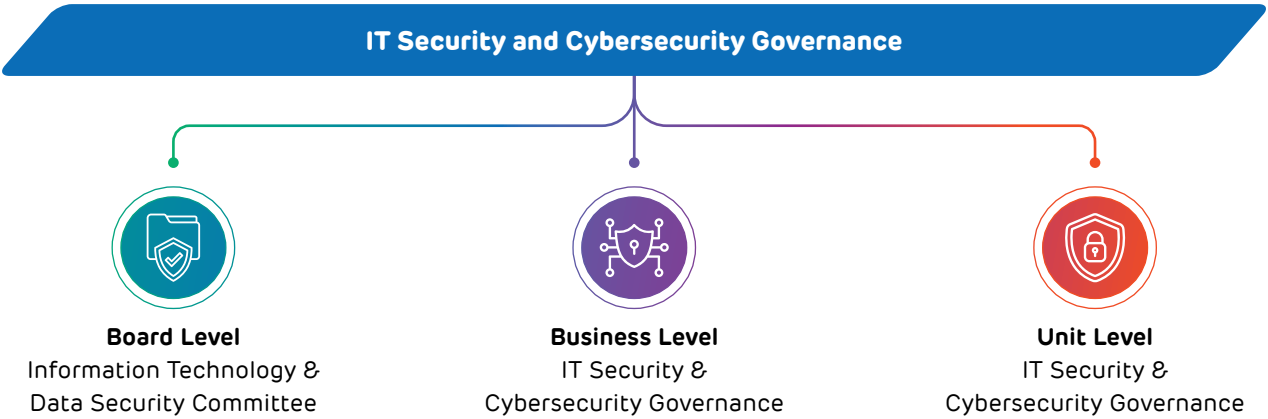
Dr. Vinay Prakash, a Director on AEL's Board, brings extensive experience in digitalisation, information security, and cybersecurity, gained through over 20 years of service with the Adani Group. He has played a key role in overseeing and leading digitalisation efforts within Adani's Natural Resource Business. Additionally, Dr. Prakash is a member of the Information Technology & Data Security Committee, which reviews cybersecurity issues and offers strategic guidance to management.

At board level, the Information Technology & Data Security Committee (IT & DS Committee) consists of five members, with a majority being Independent Directors. The Committee operates under a comprehensive charter, which can be accessed on the company's website at: https://www.adanienterprises.com/investors/board-and-committee-charters.

At the business level, the Chief Information Security Officer (CISO) of each division holds primary responsibility for implementing IT security and cybersecurity systems and procedures. They ensure the effectiveness and efficiency of security processes and infrastructure, safeguarding the organization from cyber threats.

At the unit level, governance is enforced through strict adherence to company-wide IT and cybersecurity policies. Each unit actively monitors its own systems, conducts regular risk assessments, and implements security protocols to protect sensitive data. Periodic training and awareness programs for employees further enhance security measures, ensuring that IT governance aligns with global best practices across all operations.

Information security measures

AEL has implemented a Cybersecurity and Data Privacy Policy that prioritizes safeguarding information and aligns with international standards and regulatory compliance. This policy ensures that data privacy and cybersecurity are integral to the company's operations across all sectors.

Training and Awareness initiatives are a critical part of AEL's cybersecurity framework. Based on training needs, various programs are conducted, such as AI audit tool implementation training, digital proficiency training in the airport business, Oracle programs for digital capability building, and cybersecurity-specific training for employees in the Data Center business.

Additionally, all employees are required to complete mandatory online courses on cybersecurity awareness, ensuring they understand fundamental data protection practices and threat mitigation techniques.
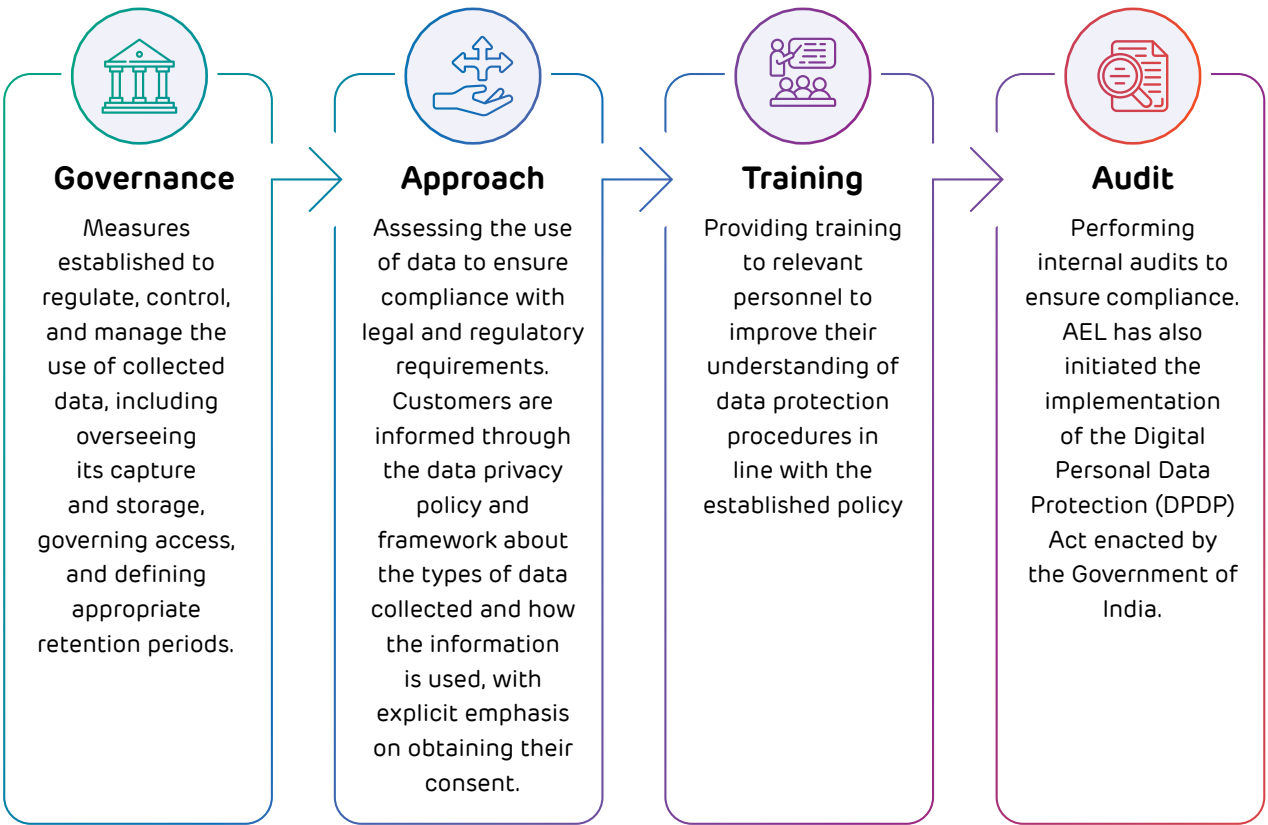
AEL has also established well-defined Escalation Procedures, with an escalation matrix categorized by the severity of incidents. This ensures that cybersecurity threats are addressed promptly and appropriately, minimizing potential risks to the company's operations and data.

Privacy Protection

AEL is committed to safeguarding personal information through a robust privacy policy that outlines how data is collected, used, and protected. This policy ensures transparency and accountability in managing both personal and other sensitive information. The policy is available on AEL's website (Privacy Policy)

Governance	Approach	Training	Audit
Measures established to regulate, control, and manage the use of collected data, including overseeing its capture and storage, governing access, and defining appropriate retention periods.	Assessing the use of data to ensure compliance with legal and regulatory requirements. Customers are informed through the data privacy policy and framework about the types of data collected and how the information is used, with explicit emphasis on obtaining their consent.	Providing training to relevant personnel to improve their understanding of data protection procedures in line with the established policy	Performing internal audits to ensure compliance. AEL has also initiated the implementation of the Digital Personal Data Protection (DPDP) Act enacted by the Government of India.

At Adani Enterprises Limited (AEL), we understand that the diverse nature of our business verticals leads to varying requirements for customer and stakeholder data collection, as well as data privacy measures. To address these specific needs, we have implemented vertical-specific privacy policies in addition to the overarching Adani Enterprises Limited Privacy Policy. This approach ensures that each vertical adheres to tailored data protection practices while maintaining a unified commitment to privacy and security across AEL.

For example, our airport business, being highly customer-centric, has a dedicated privacy policy that addresses the unique concerns related to data privacy and protection. This policy focuses on ensuring that customer information is handled securely, reflecting our commitment to trust and compliance with data protection regulations. The

Adani Airport Privacy Policy is readily available on the airports website, ensuring that customers are well-informed about how their personal information is managed.

1. **Nature of Information Captured:** As Category A data, we collect Passenger Name, Mobile Number, Email Address, PNR (Passenger Name Record), and Flight Details. In Category B, we collect Aadhaar Card information, Photographs, and Email IDs.

2. **Use of Collected Information:** Category A data is processed to enable end-to-end passenger journey systems within the airports. Category B data is processed to facilitate the provision of required services for employees, partners, and visitors. The data is necessary for generating invoices for services rendered and facilitating payment receipts.

3. **Customers' Control over Data Collection, Use, Retention, and Processing:** Both categories of data are used to ensure smooth operations for passengers, employees, visitors, and partners within the airport systems. Opt-out options are partially applicable for Category A, while not applicable for Category B. Opt-in consent is partially applicable for Category A, and fully applicable for Category B. Customers can request access to their data, which is maintained with restricted access. However, data transfer to other service providers is not applicable as per our policy. Customers can also request corrections to their data, subject to following standard operating procedures. Provision for data deletion is available upon request.

4. **Information Retention Period:** Data from both categories is kept since the point of collection or the date of creation.

5. **Information Protection:** We ensure the protection of customer information in accordance with our policy and industry best practices. When it comes to data handling and storage, active customer data remains within our system, and appropriate measures are taken to secure and protect it. We strictly adhere to data confidentiality and do not disclose customer information to any third parties unless required by government agencies for statutory compliance purposes.

6. **Third-Party Disclosure Policy:** We have Non-Disclosure Agreements (NDAs) in place for third parties, in accordance with our Company policy.

7. **Monitoring of Customer Data for Secondary Purposes**: We are committed to maintaining transparency and safeguarding customer privacy throughout our operations in compliance with applicable regulations and industry standards. We are proud to report that in FY 2023-24, there were zero substantiated incidents involving breaches of customer privacy, theft, leaks, or loss of customer data or critical information. This reflects our commitment to maintaining the highest standards of data privacy and security for our valued customers.

We have also embarked on the implementation of Digital Personal Data Protection Act (DPDP Act) enacted by the Government of India, which is focused on regulating the processing of digital personal data. It aims to balance individuals' right to protect their data with the need to process it for lawful purposes.

Using Data Leakage Prevention (DLP) technology all instances of data transfer are monitored to identify data exfiltration, thereby protecting confidential corporate information. We have implemented state-of-the-art perimeter security controls to monitor and protect our network.

1. Designated person or department responsible for privacy issues.

2. We conduct third-party audits of the privacy policy compliance based on ISO 27001 audits.

3. We conduct internal audits of the privacy policy system and processes.

Privacy Management

We ensure the privacy and security of customer data. Our Cyber Security policy includes provisions for data privacy and outlines how we handle data in compliance with applicable regulations and global best practices. Customers and business partners have the means to connect with our team via email and phone regarding their personal data concerns. The following mechanisms are in place to ensure effective implementation of our Company's privacy policy:

1. Privacy policy applies to the entire operations, including suppliers.

2. Designated IT and cyber security department responsible for privacy issues.

3. Privacy policy system embedded in group-wide risk/ compliance management.

4. Disciplinary actions are taken in case of breach. We have zero tolerance policy for this.

5. Management Audit and Assurance (MAAS) team conduct internal audit for privacy policy compliance.

Supply Chain Management

At AEL, supply chain management is integral to ensuring long-term sustainability across our diverse business sectors. Operating in industries ranging from solar manufacturing and mining to natural resource and infrastructure, AEL relies on a robust and resilient supply chain that contributes to operational efficiency and sustainability.

Given the critical role of suppliers, AEL views them as key partners in driving sustainable practices from upstream to downstream operations. Our suppliers are instrumental in helping AEL meet its environmental, social, and governance (ESG) goals, ensuring that materials are sourced responsibly, processes are optimized, and resources are used efficiently. Collaboration with suppliers enables us to minimize environmental impact, reduce waste, and promote responsible business practices across the value chain.

Identification and Selection of Suppliers & Supplier's Self-Assessment

Leveraging platforms like the ARIBA (vendor Onboarding Platform) portal, we screen suppliers based on ESG criteria and other relevant parameters during the onboarding process. After ARIBA screening, suppliers undergo further screening upon onboarding, where ESG indicators are integrated into purchase order terms. Subsequent screenings occur during regular meetings and training sessions, aiming to educate suppliers on best practices and industry developments.

Following are the criteria for supplier selection:

1. Outcome of online self-assessment on ESG and other relevant parameters through ARIBA.
2. Acceptance and Adherence to Supplier Code of Conduct (SCoC).
3. Outcome of Country-specific, Sector-specific, and Commodity-specific risk assessment.
4. Outcome of product quality assessment.
5. Supplier's screening with a focus on business relevance to identify suppliers that can effectively support AEL's diverse sectors.

Key suppliers are identified based on the following parameters:

1. Supplier delivering high value products based on "Spent Analysis".
2. Supplier delivering the core products important for operations.

3. Purchasing practices towards suppliers to ensure alignment with the Supplier Code of Conduct and to avoid potential conflicts with ESG requirements.

Supplier Engagement & Development

1. **Collaborative Partnerships:** We believe in fostering collaborative partnerships with our suppliers, engaging in open dialogue to address environmental concerns and explore sustainable solutions.
2. **Capacity Building:** We provide resources and support to suppliers to enhance their understanding of environmental issues and improve their environmental management capabilities.
3. **Continuous Monitoring:** We regularly monitor and assess the suppliers' environmental performance to identify areas for improvement and provide guidance on implementing best practices.

We have also delineated sustainability criteria for Tier 1 suppliers, motivating them to initiate sustainability measures while augmenting local sourcing to bolster economic development. Suppliers failed to adhere to minimum ESG standards, our SCoC, and other relevant parameters are excluded from contracting. This focus culminated in the implementation of a sustainability-based vendor ranking system for all procurement decisions, ensuring compliance with environmental, social, and governance standards.

Following screening and assessment, we identify areas for improvement and actively engage with the suppliers. Through awareness sessions and induction programmes conducted by respective departments we articulate our vision on safety, sustainability, human rights, and industrial relations requirements.

Supplier Profile

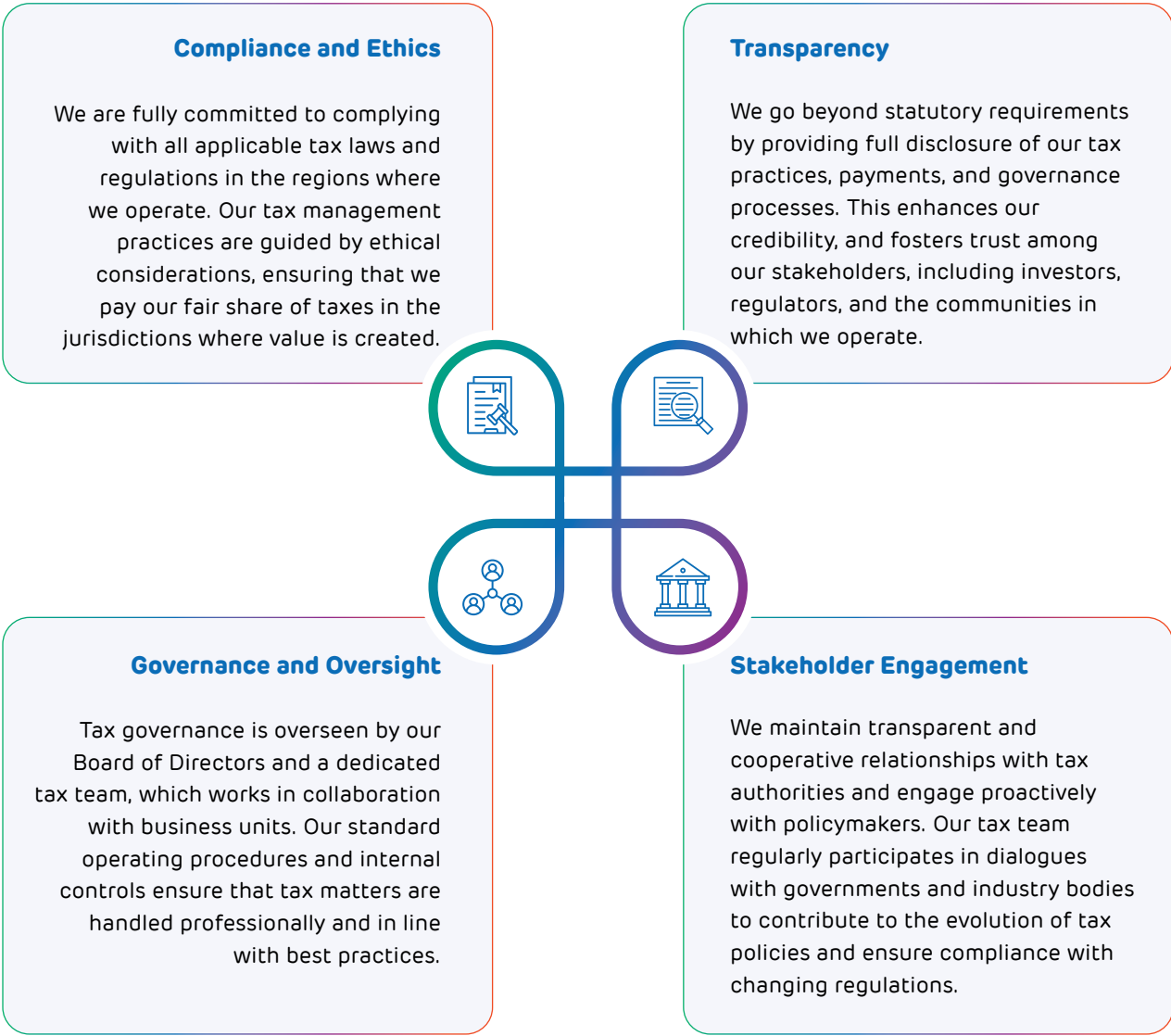| Particulars	FY 2024
Total number of Tier-1 suppliers	1125
Total number of significant suppliers in Tier-1	30
% Of total spend on significant suppliers in Tier-1	75
Total number of significant suppliers in non-Tier-1	0
Number of suppliers assessed with substantial actual/potential negative impacts	0
% of suppliers with substantial actual/potential negative impacts with agreed corrective action/improvement plan	0
% of suppliers assessed with substantial actual/potential negative impacts supported in corrective action plan implementation	0
Total number of suppliers supported in corrective action plan implementation	0
Total number of suppliers in capacity building programs	30

Our Commitment to Tax Transparency

Adani Enterprises Ltd. (AEL) firmly believes that tax transparency is not just a financial obligation but a key aspect of responsible corporate governance. As part of our ongoing commitment to Growth with Goodness, we have adopted a forward-looking approach that aligns tax management with our broader Environmental, Social, and Governance (ESG) strategy.

Our voluntary Tax Transparency Report highlights our transparent tax practices and is designed to enhance stakeholder trust and demonstrate our role in supporting national development.

Our Approach to Tax

At AEL, we view tax as a material contribution to society and a vital aspect of our governance structure. Our tax approach revolves around several key principles:

Compliance and Ethics

We are fully committed to complying with all applicable tax laws and regulations in the regions where we operate. Our tax management practices are guided by ethical considerations, ensuring that we pay our fair share of taxes in the jurisdictions where value is created.

Transparency

We go beyond statutory requirements by providing full disclosure of our tax practices, payments, and governance processes. This enhances our credibility, and fosters trust among our stakeholders, including investors, regulators, and the communities in which we operate.

Governance and Oversight

Tax governance is overseen by our Board of Directors and a dedicated tax team, which works in collaboration with business units. Our standard operating procedures and internal controls ensure that tax matters are handled professionally and in line with best practices.

Stakeholder Engagement

We maintain transparent and cooperative relationships with tax authorities and engage proactively with policymakers. Our tax team regularly participates in dialogues with governments and industry bodies to contribute to the evolution of tax policies and ensure compliance with changing regulations.

Categories of Contributions

AEL plays a dual role in tax contributions: both as a taxpayer in our own right and as a collector of taxes on behalf of the government. Our contributions fall into three broad categories:

1. Direct Contributions: These include corporate taxes on income, government royalties, and other charges borne by AEL and its subsidiaries. These payments are made directly to the government and reflect the taxes on profits generated by our business activities.

2. Indirect Contributions: As an intermediary, AEL collects taxes on behalf of the government from various stakeholders. This includes withholding taxes on vendor and employee payments, Goods and Services Tax (GST), Value Added Tax (VAT), and other levies. These contributions represent our responsibility to pass on collected taxes to the government in a timely and transparent manner.

3. Other Contributions: In addition to taxes, AEL makes significant contributions in the form of social security payments and other statutory obligations. These include Provident Fund contributions and Employee State Insurance, which support the welfare of our workforce and contribute to the broader social safety net.

ESG Integration

Tax transparency at AEL is closely linked with our ESG framework. We believe that transparent tax practices contribute to economic sustainability and social equity. Our approach ensures that tax governance is integrated with the broader principles of corporate responsibility, helping us support the communities we operate in while contributing to national infrastructure and social services.

Our dedication to tax transparency not only reflects our legal obligations but also our role as a responsible corporate citizen, committed to ethical practices and sustainable growth. This initiative further demonstrates our alignment with global best practices in tax governance, contributing to long-term value creation for all stakeholders.

For further information, we encourage you to refer to the Adani Enterprises Tax Transparency Report.