adani	Adani Enterprises Limited **Supplier Code of Conduct**	Updated on – 30.07.25 Version – 1.2

Adani Enterprises Limited (AEL) is committed to responsible and ethical business practices in the areas of human rights, labour practices, environment, anti-corruption, and other governance related areas. AEL considers suppliers as business partners. This Code of Conduct is aimed at collaborating with our suppliers in the promotion of lawful, professional, and fair business practices that integrates respect for human rights, business ethics and the environment.

Applicability - This Supplier Code of Conduct is applicable to all Suppliers globally. Here, "Supplier" refers to material suppliers, service providers, vendors, traders, agents, consultants, contractors, third parties including their employees, agents and other representatives, who have a business relationship with and provide, sell, seek to sell, any kinds of goods or services to AEL or any of its subsidiaries and associated entities. The Supplier shall communicate the code to related entities and subcontractors who support them in delivering materials or services and ensure adherence from all related entities and subcontractors.

Guidelines on the Code of Conduct

Regulatory Compliance: The Supplier shall ensure to comply with all applicable laws and regulations in all the territories it operates.

Human Resources

- **Freely Chosen Employment:** The Supplier shall ensure to hire all their employees on their own free will; and all their operations are free from child labour, forced labour, and bonded labour or any other form of compulsory labour or slavery.
- **Prevention of Discrimination and Harassment:** The Supplier strive to ensure that its employees do not face any form of discrimination and harassment and ensure equal employment opportunities and a conducive environment to all its employees for their growth.
- **Working Conditions:** The Supplier shall comply with all applicable laws and regulations with respect to working hours, minimum wages and employing labour, including those pertaining to women and children. The Supplier shall treat their employees with respect and dignity and ensure humane working conditions.
- **Prevention of Human Trafficking:** The Supplier shall ensure the compliance with all anti-human trafficking laws internally and across their supply chains.
- **Freedom of Association and Collective Bargaining:** The Supplier shall be committed to an open and constructive dialogue with their employees and worker's representatives, in accordance with applicable laws.

Health and Safety

- The Supplier shall ensure provision of safe and healthy working environment to its employees/ workers.
- The Supplier shall ensure necessary precautionary safety measures and shall design processes to protect against potential accidents and occupational hazards.
- The Supplier shall ensure that general principles of health and safety risk prevention are met in the process of delivery of products and services. General principles include identifying, minimizing and preventing hazards using competent and trained professionals; maintaining safe equipment and tools; providing personal protective equipment (PPE) as required.
- The Suppliers shall ensure that adequate training is provided for all employees, workers/ contractors on health and safety issues.
- The Supplier shall ensure provision of safe, clean and secure accommodations to their employees, if applicable.

Environment Management

- **Mitigation of greenhouse gas (GHG) emissions:** The Supplier shall strive to monitor and adopt measures to reduce its GHG emission footprint.
- **Energy Consumption:** The Supplier shall monitor energy consumption and implement efficiency measures, prioritizing the use of renewable energy wherever feasible.
- **Natural resource conservation**: The Supplier shall ensure that optimal processes exist for conservation of natural resources and minimization of the release of harmful emissions to the environment.
- **Efficient systems and process**: The Supplier shall ensure ongoing initiatives to promote environmental responsibilities and encourage environmentally friendly processes and technologies.

- **Pollution prevention:** The Supplier shall ensure compliance with all laws pertaining to sustainability, pollution, environment protection etc. as applicable.
- **Water management:** The Supplier shall monitor its water withdrawal and establish targets to reduce consumption. Additionally, the Supplier shall ensure the provision of fully-functioning and safely managed Water, Sanitation, and Hygiene (WASH) services for all their employees, in compliance with statutory obligations.
- **Waste management:** The Supplier shall ensure management of wastes of any form – hazardous, non-hazardous, industrial, solid, liquid, gaseous as per the prevailing laws and recommended guidelines.
- **Biodiversity:** The Supplier shall strive to protect biodiversity and ecosystems in and around its operational areas.

Governance

- **Adherence with Company Policy**: The Supplier shall follow all contract conditions and other applicable policies of the Company while executing any work at AEL Company sites.
- **Anti-Bribery and Anti-Corruption**: The Supplier shall not offer or accept bribes or other unlawful incentives to/from their business partners.
- **Anti-Competitive Practices**: The Supplier should abstain from undertaking any form of anti-competitive practices.
- **Conflict of Interest**: The Supplier shall not take advantage of any family/ social/ political connections to obtain favourable treatment that creates any actual or potential conflict of interest.
- **Grievance Redressal**: The Supplier shall ensure that any worker/ employee, acting individually or with other workers, can submit grievance and an effective grievance procedure should be established for its redressal.
- **Reporting Unethical Practices**: The Suppliers shall report any unethical activity or discrimination if practiced by any employee of AEL or other related parties, as per the Whistle-Blower Policy.
- **Intellectual Property**: The Supplier shall ensure that all employees' and business partners' privacy and intellectual property rights, which includes protection against disclosures, patents, copyrights and trademarks are protected.
- **Third Party Representation**: The Suppliers shall not be authorized to represent AEL or to use its brand without written permission from AEL. Third parties and their employees who are authorized to represent AEL are expected to abide by provision in the non-disclosure agreement to be signed by them.
- **Prohibition on Insider Trading**: The Suppliers and their personnel shall not use any material or non-publicly disclosed information for trading of AEL Businesses securities or enabling others for the same.

Subcontracting: The Supplier shall not use any subcontractor in connection with any AEL business unless subcontractor abides by the same conditions as put forth by AEL. The Supplier shall submit declaration with list of subcontractors to AEL prior to commencement of work. AEL BUs must be notified immediately in case of any changes in subcontracting.

Supplier Evaluation: AEL has set specific supplier expectations regarding supplier performance with the Code. AEL will continue to evaluate the Suppliers taking into consideration the ability to meet the objective and expectations of this Code.

Continuous Improvement: Where applicable, AEL will support Suppliers in the establishment of best practices to meet and exceed the standards outlined in the Code.

Acceptance: By signing the purchase order/contract/agreement, the Supplier acknowledges having read, understood, and accepted the guidelines as described in the Supplier Code of Conduct. The Suppliers are expected to fulfil the aforementioned key elements of this policy by incorporating them in their own business practices.

Policy Approval:

The updated version of the Supplier Code of Conduct was placed before the Board-level Corporate Responsibility Committee (CRC) at its meeting held on 30th July 2025 and reviewed/approved thereat.