



Ports and
Logistics

Ref No: APSEZL/SECT/2026-27/31

May 29, 2026

BSE Limited

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

Scrip Code: 532921

National Stock Exchange of India Limited

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

Scrip Code: ADANIPORTS

Sub: Business Responsibility and Sustainability Report for the financial year 2025-26

Dear Sir/Madam,

Pursuant to Regulation 34 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Business Responsibility and Sustainability Report for the Financial Year 2025-26 which is being sent through electronic mode to the Members who have registered their e-mail addresses with the Company/Depositories.

The Integrated Annual Report along with the Business Responsibility and Sustainability Report for the Financial Year 2025-26 is also uploaded on the Company's website and can be accessed at www.adaniports.com.

You are requested to take the same on your record.

Thanking you,

Yours faithfully,

For Adani Ports and Special Economic Zone Limited

Kamlesh Bhagia
Company Secretary

Encl.: As above

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

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Business Responsibility and Sustainability Report FY 2025-26

SECTION A: GENERAL DISCLOSURE

I. DETAILS OF THE LISTED ENTITY

1	Corporate Identity Number (CIN) of the Listed Entity	: L63090GJ1998PLC034182
2	Name of the Listed Entity	: Adani Ports and Special Economic Zone Limited
3	Year of Incorporation	: 1998
4	Registered office address	: Adani Corporate House, Shantigram, Near Vaishno Devi Circle, S. G. Highway, Khodiyar, Ahmedabad-382421 Gujarat
5	Corporate address	: Adani Corporate House, Shantigram, Near Vaishno Devi Circle, S. G. Highway, Khodiyar, Ahmedabad-382421 Gujarat
6	E-mail	: investor.apsezl@adani.com
7	Telephone	: 079-25554444
8	Website	: www.adaniports.com
9	Financial year for which reporting is being done	: April 01, 2025 to March 31, 2026
10	Name of the Stock Exchange(s) where shares are listed	a) BSE Limited b) National Stock Exchange of India Limited
11	Paid-up Capital	: Paid up equity capital – INR 460.79 crore Paid up preferential capital – INR 2.50 crore
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	: Mr. Rahul Agarwal Head – ESG & IR Email: Rahul.Agarwal5@adani.com Phone: 079 – 25558888
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements taken together).	: The financial, environmental, social and governance disclosures made in this report are on a consolidated basis . Nearly 100% of APSEZ's Consolidated employee base and over 95% of APSEZ's Consolidated energy, water and emission footprint.
14	Name of assessment or assurance provider	: TUV India Pvt Ltd
15	Type of assessment or assurance obtained	: Reasonable Assurance, as defined by International Standards on Assurance Engagements (ISAE 3000)

II. PRODUCTS AND SERVICES

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

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

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

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

III. OPERATIONS

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

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

*Including the under construction

19. Markets served by the entity:

a. Number of locations

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

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

Not Applicable. The Company is not a manufacturing entity. It is a service-providing company, primarily engaged in port operations, cargo handling, end-to-end logistics services, and marine services.

c. A brief on types of customers:

Adani Ports and Special Economic Zone Limited (APSEZ) operates as an integrated transport utility, primarily serving B2B customers across port operations, cargo handling, logistics, marine services, and SEZ infrastructure. The Company handles diversified cargo including dry, liquid, crude oil, containers, and break-bulk, catering to customers from the industrial, manufacturing, shipping, freight forwarding, and agricultural sectors, ranging from domestic enterprises to multinational corporations. Through its subsidiaries, APSEZ provides end-to-end inland logistics and agri-logistics services, including ICDs, multi-modal logistics parks, and modern agricultural storage infrastructure, and also serves government and institutional customers in select operations.

IV. EMPLOYEES

20. Details as at the end of Financial Year

i. Employees and workers (including differently abled):

Particulars	Total (A)	Male		Female		Others	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (H)	% (H/A)
EMPLOYEES							
Permanent (D)	2,490	2,332	93.65	158	6.35	0	0.00
Other than Permanent (E)	97	82	84.54	15	15.46	0	0.00
Total Employees (D+E)	2,587	2,414	93.31	173	6.69	0	0.00
WORKERS							
Permanent (F)	882	831	94.22	51	5.78	0	0.00
Other than Permanent (G)	47,353	45,227	95.51	2,126	4.49	0	0.00
Total Workers (F+G)	48,235	46,058	95.49	2,177	4.51	0	0.00

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

ii. Differently abled Employees and workers:

Particulars	Total (A)	Male		Female		Others	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (H)	% (H/A)
DIFFERENTLY ABLED EMPLOYEES							
Permanent (D)	7	7	100.00	0	0.00	0	0.00
Other than Permanent (E)	0	0	0.00	0	0.00	0	0.00
Total differently abled employees (D+E)	7	7	100.00	0	0.00	0	0.00
DIFFERENTLY ABLED WORKERS							
Permanent (F)	1	1	100.00	0	0.00	0	0.00
Other than Permanent (G)	0	0	0.00	0	0.00	0	0.00
Total differently abled workers (F+G)	1	1	100.00	0	0.00	0	0.00

21. Participation/Inclusion/Representation of women

Particulars	Total (A)	Number (B)	Percentage of Females % (B/A)
Board of Directors	9	1	11
Key Management Personnel	4	0	0

Note: (1) Details as on March 31, 2026; (2) Two Directors are a part of KMPs

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

Particulars	Turnover Rate in FY 2025-26				Turnover Rate in FY 2024-25				Turnover Rate in FY 2023-24			
	Male	Female	Others	Total	Male	Female	Others	Total	Male	Female	Others	Total
Permanent Employees	16.04	12.66	0.00	15.82	16.00	21.00	0.00	16.00	15.00	23.00	0.00	16.00
Permanent Workers	5.42	3.92	0.00	5.33	8.00	0.00	0.00	8.00	4.00	100.00	0.00	4.00

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

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

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Adani Ports and Special Economic Zone Limited	Holding	100.00%	Yes
2	Adani Petronet (Dahej) Port Limited	Subsidiary	74.00%	Yes
3	Adani Harbour Services Limited (amalgamated with Adani Ports and Special Economic Zone Limited from April 21, 2026)	Subsidiary	100.00%	Yes
4	Shanti Sagar International Dredging Limited ("SSIDL")	Subsidiary	100.00%	Yes
5	Ocean Sparkle Limited ("OSL")	Subsidiary	98.52%	Yes
6	Sea Sparkle Harbour Services Limited	Subsidiary	98.52%	Yes
7	Sparkle Port Services Limited	Subsidiary	98.52%	Yes
8	Sparkle Terminal & Towage Services Limited	Subsidiary	98.52%	Yes
9	Adani Hazira Port Limited ("AHPL")	Subsidiary	100.00%	Yes
10	Hazira Infrastructure Limited	Subsidiary	100.00%	Yes
11	Adani Murmugao Port Terminal Private Limited	Subsidiary	100.00%	Yes
12	Adani Vizag Coal Terminal Private Limited	Subsidiary	100.00%	Yes
13	Adani Kandla Bulk Terminal Private Limited	Subsidiary	100.00%	Yes

ADANI PORTS AND SPECIAL ECONOMIC ZONE LIMITED

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
14	Adani Vizhinjam Port Private Limited	Subsidiary	100.00%	Yes
15	The Dhamra Port Company Limited ("DPCL")	Subsidiary	100.00%	Yes
16	Dhamra Infrastructure Limited	Subsidiary	100.00%	Yes
17	Karnavati Aviation Private Limited	Subsidiary	100.00%	Yes
18	Karaikal Port Private Limited	Subsidiary	100.00%	Yes
19	Marine Infrastructure Developer Private Limited	Subsidiary	97.00%	Yes
20	Adani Kattupalli Port Limited	Subsidiary	100.00%	Yes
21	Mundra SEZ Textile and Apparel Park Private Limited	Subsidiary	55.28%	Yes
22	Mundra International Airport Limited	Subsidiary	100.00%	Yes
23	Adani Warehousing Services Limited	Subsidiary	100.00%	Yes
24	Adani Hospitals Mundra Limited	Subsidiary	100.00%	Yes
25	Madurai Infrastructure Limited	Subsidiary	100.00%	Yes
26	HDC Bulk Terminal Limited	Subsidiary	100.00%	Yes
27	Adani Ports Technologies Private Limited ("APTPL")	Subsidiary	100.00%	Yes
28	Tajpur Sagar Port Limited	Subsidiary	100.00%	Yes
29	Mundra Crude Oil Terminal Limited	Subsidiary	100.00%	Yes
30	Adani Tracks Management Services Limited	Subsidiary	100.00%	Yes
31	Adani Container Terminal Limited	Subsidiary	100.00%	Yes
32	Adani Gangavaram Port Limited	Subsidiary	100.00%	Yes
33	Adani Container Manufacturing Limited	Subsidiary	100.00%	Yes
34	Adani Bulk Terminals (Mundra) Limited	Subsidiary	100.00%	Yes
35	Dighi Port Limited	Subsidiary	100.00%	Yes
36	Adinath Polyfills Private Limited	Subsidiary	100.00%	Yes
37	Gangavaram Port Services (India) Limited	Subsidiary	100.00%	Yes
38	Adani Krishnapatnam Port Limited ("AKPL")	Subsidiary	100.00%	Yes
39	Seabird Distriparks (Krishnapatnam) Limited	Subsidiary	100.00%	Yes
40	Udanvat Leasing IFSC Limited	Subsidiary	100.00%	Yes
41	Adani Logistics Limited ("ALL")	Subsidiary	100.00%	Yes
42	Dholera Infrastructure Private Limited ("DIPL")	Subsidiary	49.00%	Yes
43	Mundra LPG Terminal Private Limited	Subsidiary	48.97%	Yes
44	Dholera Port and Special Economic Zone Limited	Subsidiary	49.00%	Yes
45	Mundra Solar Technopark Private Limited	Subsidiary	48.99%	Yes
46	DPA Container and Clean Cargo Terminal Limited	Subsidiary	100.00%	Yes
47	Gopalpur Ports Limited	Subsidiary	95.00%	Yes
48	Adani Agri Logistics Limited ("AALL")	Subsidiary	100.00%	Yes
49	Adani Agri Logistics (Samastipur) Limited	Subsidiary	100.00%	Yes
50	Adani Agri Logistics (Darbhanga) Limited	Subsidiary	100.00%	Yes
51	Blue Star Realtors Limited	Subsidiary	100.00%	Yes
52	Mandhata Build Estate Limited ("MBEL")	Subsidiary	100.00%	Yes
53	Nabhganga Enterprises Private Limited	Subsidiary	100.00%	Yes
54	Griptronics Enterprises Private Limited	Subsidiary	100.00%	Yes
55	Adrita Realtors Limited	Subsidiary	100.00%	Yes
56	Agratas Projects Limited	Subsidiary	100.00%	Yes
57	Dependencia Infrastructure Limited	Subsidiary	100.00%	Yes
58	Adani Agri Logistics (Dahod) Limited	Subsidiary	100.00%	Yes
59	Adani Warehousing Limited	Subsidiary	100.00%	Yes

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
60	AY Builders Private Limited	Subsidiary	100.00%	Yes
61	AY Buildwell Private Limited	Subsidiary	100.00%	Yes
62	VMM Developers Private Limited	Subsidiary	100.00%	Yes
63	YYA Realtors and Developers Private Limited	Subsidiary	100.00%	Yes
64	AY Realtors and Developers Private Limited	Subsidiary	100.00%	Yes
65	VAMI Realtech Private Limited	Subsidiary	100.00%	Yes
66	YA Developers Private Limited	Subsidiary	100.00%	Yes
67	Dependencia Logistics Private Limited	Subsidiary	100.00%	Yes
68	Dermot Infracon Limited	Subsidiary	100.00%	Yes
69	Shankheshwar Buildwell Limited	Subsidiary	100.00%	Yes
70	Sulochana Pedestal Limited ("SPPL")	Subsidiary	100.00%	Yes
71	NRC Limited	Subsidiary	100.00%	Yes
72	Adani Forwarding Agent Limited	Subsidiary	100.00%	Yes
73	AYN Logistics Infra Private Limited	Subsidiary	100.00%	Yes
74	Adani Logistics Services Limited ("ALSPL")	Subsidiary	98.39%	Yes
75	Adani Noble Limited	Subsidiary	98.39%	Yes
76	Adani Logistics Infrastructure Limited	Subsidiary	98.39%	Yes
77	Saptati Build Estate Limited	Subsidiary	100.00%	Yes
78	Adani Agri Logistics (MP) Limited	Subsidiary	100.00%	Yes
79	Adani Agri Logistics (Harda) Limited	Subsidiary	100.00%	Yes
80	Adani Agri Logistics (Hoshangabad) Limited	Subsidiary	100.00%	Yes
81	Adani Agri Logistics (Satna) Limited	Subsidiary	100.00%	Yes
82	Adani Agri Logistics (Ujjain) Limited	Subsidiary	100.00%	Yes
83	Adani Agri Logistics (Dewas) Limited	Subsidiary	100.00%	Yes
84	Adani Agri Logistics (Panipat) Limited	Subsidiary	100.00%	Yes
85	Adani Agri Logistics (Katihar) Limited	Subsidiary	100.00%	Yes
86	Adani Agri Logistics (Kotkapura) Limited	Subsidiary	100.00%	Yes
87	Adani Agri Logistics (Kannauj) Limited	Subsidiary	100.00%	Yes
88	Adani Agri Logistics (Barnala) Limited	Subsidiary	100.00%	Yes
89	Adani Agri Logistics (Moga) Limited	Subsidiary	100.00%	Yes
90	Adani Agri Logistics (Mansa) Limited	Subsidiary	100.00%	Yes
91	Adani Agri Logistics (Nakodar) Limited	Subsidiary	100.00%	Yes
92	Adani Agri Logistics (Raman) Limited	Subsidiary	100.00%	Yes
93	Adani Agri Logistics (Dhamora) Limited	Subsidiary	100.00%	Yes
94	Adani Agri Logistics (Sandila) Limited	Subsidiary	100.00%	Yes
95	Adani Agri Logistics (Gonda) Limited	Subsidiary	100.00%	Yes
96	Adani Agri Logistics (Chandari) Limited	Subsidiary	100.00%	Yes
97	Adani Agri Logistics (Katihar Two) Limited	Subsidiary	100.00%	Yes
98	PU Agri Logistics Limited	Subsidiary	100.00%	Yes
99	BU Agri Logistics Limited	Subsidiary	100.00%	Yes
100	HM Agri Logistics Limited	Subsidiary	100.00%	Yes
101	Kliptek Projects Private Limited	Subsidiary	100.00%	Yes
102	Nihita Green Energy Private Limited	Subsidiary	100.00%	Yes
103	Vidip Realtors Private Limited	Subsidiary	100.00%	Yes
104	Sarwa Projects Private Limited	Subsidiary	100.00%	Yes
105	Seed Biocoat Private Limited	Subsidiary	100.00%	Yes

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
106	RG Data Center Private Limited	Subsidiary	100.00%	Yes
107	West Peak Data Center Private Limited	Subsidiary	100.00%	Yes
108	Infradigest Developers Private Limited	Subsidiary	100.00%	Yes
109	Beamx Infra Private Limited	Subsidiary	100.00%	Yes
110	Pillstrong Infra Private Limited	Subsidiary	100.00%	Yes
111	Adani International Container Terminal Private Limited	Joint Venture	50.00%	Yes
112	Adani CMA Mundra Terminal Private Limited	Joint Venture	50.00%	Yes
113	Adani Ennore Container Terminal Private Limited	Joint Venture	51.00%	Yes
114	Adani Total Private Limited (ATPL)	Joint Venture	50.00%	Yes
115	Dhamra LNG Terminal Private Limited	Joint Venture	50.00%	Yes
116	IndianOil Adani Ventures Limited (IAVL)	Joint Venture	49.99%	No
117	IAV Utkarsh Limited	Joint Venture	49.99%	No
118	IAV Engineering Projects Limited	Joint Venture	49.99%	No
119	IAV Engineering & Construction Services Limited	Joint Venture	49.99%	No
120	IAV Infrastructures Private Limited	Joint Venture	49.99%	No
121	IAV Biogas Private Limited	Joint Venture	49.99%	No
122	IAV Urja Services Limited	Joint Venture	49.99%	No
123	IAV Udaan Limited	Joint Venture	49.99%	No
124	IOT Utkal Energy Services Limited	Joint Venture	35.78%	No
125	Zuari IAV Private Limited	Joint Venture	25.00%	No
126	KN IAV Private Limited	Joint Venture	24.50%	No
127	Kazakhstan Caaspishelf India Private Limited	Joint Venture	49.99%	No
128	Adani NYK Auto Logistics Solutions Private Limited	Joint Venture	51.00%	Yes
129	Adani KP Agriwarehousing Private Limited	Joint Venture	74.00%	Yes
130	EZR Technologies Private Limited	Joint Venture	51.00%	Yes
131	Abbot Point Operations Pty Ltd., Australia ("APOPL")	Subsidiary	100.00%	Yes
132	Abbot Point Bulkcoal Pty Ltd., Australia	Subsidiary	100.00%	Yes
133	Anchor Port Holding Pte Ltd. ("APHPL")	Subsidiary	100.00%	Yes
134	Noble Port Pte Ltd., Singapore	Subsidiary	100.00%	Yes
135	Pearl Port Pte Ltd., Singapore	Subsidiary	100.00%	Yes
136	Adani Bangladesh Ports Private Limited, Bangladesh	Subsidiary	100.00%	Yes
137	Adani International Ports Holdings Pte Ltd, Singapore ("AIPH")	Subsidiary	100.00%	Yes
138	Colombo West International Terminal (Private) Ltd., Srilanka	Subsidiary	51.00%	Yes
139	East Africa Ports FZCO	Subsidiary	100.00%	Yes
140	Sparkle Overseas Pte Ltd. ("SOPL")	Subsidiary	98.52%	Yes
141	The Adani Harbour International DMCC, UAE ("TAHID")	Subsidiary	100.00%	Yes
142	Omni Marine Solutions	Subsidiary	100.00%	Yes
143	Port Harbour Services International Pte. Ltd, Singapore	Subsidiary	100.00%	Yes

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
144	East Africa Gateway Limited ("East Africa")	Subsidiary	30.00%	Yes
145	Tanzania East Africa Gateway Terminal Limited	Subsidiary	28.50%	Yes
146	Sunrise Worldwide Enterprise Limited ("SWEL")	Subsidiary	80.00%	Yes
147	Astro Offshore Pte. Ltd ("AOPL")	Subsidiary	80.00%	Yes
148	Astro Offshore ME Ltd	Subsidiary	80.00%	Yes
149	Astro Capella S.A.	Subsidiary	80.00%	Yes
150	Astro Offshore Ships Management and Maintenance	Subsidiary	39.20%	Yes
151	AOP Marine Agency Services LLC ("AOPLLC")	Subsidiary	80.00%	Yes
152	Astro Middle East Ship Management DMCC	Subsidiary	80.00%	Yes
153	Astro Worldwide Investment Ltd ("AWIL")	Subsidiary	80.00%	Yes
154	B300 PTE. LTD.	Subsidiary	80.00%	Yes
155	B301 PTE. LTD.	Subsidiary	80.00%	Yes
156	B311 PTE. LTD.	Subsidiary	80.00%	Yes
157	B312 PTE. LTD.	Subsidiary	80.00%	Yes
158	B313 PTE. LTD.	Subsidiary	80.00%	Yes
159	B314 PTE. LTD.	Subsidiary	80.00%	Yes
160	B3311 PTE. LTD.	Subsidiary	80.00%	Yes
161	B511 PTE. LTD	Subsidiary	80.00%	Yes
162	B3312 PTE LTD	Subsidiary	80.00%	Yes
163	B411 PTE LTD.	Subsidiary	80.00%	Yes
164	TP01 PTE LTD	Subsidiary	80.00%	Yes
165	TP02 PTE LTD	Subsidiary	80.00%	Yes
166	TP03 PTE. LTD	Subsidiary	80.00%	Yes
167	TP04 PTE. LTD	Subsidiary	80.00%	Yes
168	TP05 PTE. LTD	Subsidiary	80.00%	Yes
169	TP06 PTE.LTD	Subsidiary	80.00%	Yes
170	TP07 PTE. LTD	Subsidiary	80.00%	Yes
171	TP08 PTE. LTD	Subsidiary	80.00%	Yes
172	TP09 PTE. LTD	Subsidiary	80.00%	Yes
173	TP10 PTE.LTD	Subsidiary	80.00%	Yes
174	TP11 PTE LTD	Subsidiary	80.00%	Yes
175	TP12 PTE LTD	Subsidiary	80.00%	Yes
176	TP13 PTE LTD	Subsidiary	80.00%	Yes
177	TP14 PTE LTD	Subsidiary	80.00%	Yes
178	Astro Offshore Ship Management Pte. Ltd.	Subsidiary	80.00%	Yes
179	B315 Pte. Ltd.	Subsidiary	80.00%	Yes
180	TP15 Pte. Ltd.	Subsidiary	80.00%	Yes
181	TP17 Pte. Ltd.	Subsidiary	80.00%	Yes
182	TP18 Pte. Ltd.	Subsidiary	80.00%	Yes
183	TP19 Pte. Ltd.	Subsidiary	80.00%	Yes
184	TP20 Pte. Ltd.	Subsidiary	80.00%	Yes
185	TP21 Pte. Ltd.	Subsidiary	80.00%	Yes
186	TP23 Pte. Ltd.	Subsidiary	80.00%	Yes
187	TP24 Pte. Ltd.	Subsidiary	80.00%	Yes

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
188	TP25 Pte. Ltd.	Subsidiary	80.00%	Yes
189	TP26 Pte. Ltd.	Subsidiary	80.00%	Yes
190	B316 Pte. Ltd.	Subsidiary	80.00%	Yes
191	TP16 Pte. Ltd.	Subsidiary	80.00%	Yes
192	TP27 Pte. Ltd.	Subsidiary	80.00%	Yes
193	TP28 Pte. Ltd.	Subsidiary	80.00%	Yes
194	TP29 Pte. Ltd.	Subsidiary	80.00%	Yes
195	TP30 Pte. Ltd.	Subsidiary	80.00%	Yes
196	TP31 Pte. Ltd.	Subsidiary	80.00%	Yes
197	TP32 Pte. Ltd.	Subsidiary	80.00%	Yes
198	TP33 Pte. Ltd.	Subsidiary	80.00%	Yes
199	TP34 Pte. Ltd.	Subsidiary	80.00%	Yes
200	TP35 Pte. Ltd.	Subsidiary	80.00%	Yes
201	TP36 Pte. Ltd.	Subsidiary	80.00%	Yes
202	Abbot Point Port Holdings Pte. Ltd. ("APPH")	Subsidiary	100.00%	Yes
203	North Queensland Export Terminal Holdings Pty Ltd. ("NQETHPL")	Subsidiary	100.00%	Yes
204	NQXT Port Pty Ltd ("NQXT")	Subsidiary	99.99%	Yes
205	NQXT Capital Holdings Pty Ltd ("NCHPL")	Subsidiary	100.00%	Yes
206	NQXT Holdings Trust	Subsidiary	99.99%	Yes
207	NQXT Holdings Pty Ltd.	Subsidiary	99.99%	Yes
208	North Queensland Export Terminal Pty Ltd	Subsidiary	100.00%	Yes
209	NQXT Capital Pty Ltd	Subsidiary	100.00%	Yes
210	Abbot Point Terminal Expansion Pte. Ltd. ("APTEPL")	Subsidiary	100.00%	Yes
211	Adani Abbot Point Company Pty. Ltd.	Subsidiary	100.00%	Yes
212	Adani Australia Company Pty. Ltd.	Subsidiary	100.00%	Yes
213	Adani Abbot Point Holding Trust ("AAPHT")	Subsidiary	100.00%	Yes
214	Adani Australia Coal Terminal Holdings Pty. Ltd. ("AACTHPL")	Subsidiary	100.00%	Yes
215	Queensland Tug Services Pty Ltd.	Subsidiary	100.00%	Yes
216	Adani Australia Holding Trust.	Subsidiary	100.00%	Yes
217	Adani Australia Coal Terminal Pty Limited	Subsidiary	100.00%	Yes
218	AOP Marine and Logistics Services LLC	Subsidiary	80.00%	Yes
219	IOT Vito Muhendislik Insaat ve Taahhut AS, Turkey	Joint Venture	34.99%	No
220	Indian Oiltanking Engineering & Construction Services LLC, Oman	Joint Venture	34.99%	No
221	JSC Kazakhstancapishelf	Joint Venture	28.34%	No
222	Harbour Services Lanka (Pvt) Ltd	Joint Venture	50.00%	No
223	Mediterranean International Ports A.D.G.D Ltd, Israel ("MIPAL")	Joint Venture	70.00%	Yes
224	Haifa Port Company Ltd.	Joint Venture	70.00%	Yes
225	Khimji Sparkle Marine Services, SAOC	Joint Venture	48.27%	No
226	Al Annabi Marine Services	Joint Venture	49.00%	No

VI. CSR DETAILS

	Response
24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)	Yes
(ii) Turnover (in ₹ Crore)	38,735.77 Crore
(iii) Net worth (in ₹ Crore)	98,981.48 Crore

VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES**25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:**

Stakeholder group from whom compliant is received	Grievance Redressal Mechanism	FY 2025-26			FY 2024-25		
		No. of complaints filled during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filled during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	https://www.adaniports.com/Grievance	8	0	NA	188	9	NA
Investors (other than shareholders)	https://scores.sebi.gov.in/scores-home	21	1	1 complaint resolved in April	23	0	All complaints were disposed off
Shareholders	https://scores.sebi.gov.in/scores-home	0	0	NA	0	0	NA
Employees and workers	https://www.adaniports.com/-/media/project/ports/investor/corporate-governance/policies/whistle-blower_policy-v1.pdf	0	0	NA	6	0	All complaints were disposed off
Customers	https://www.adaniports.com/Grievance	0	0	NA	0	0	NA
Value Chain Partners	https://www.adaniports.com/Grievance	0	0	NA	0	0	NA
Other (please specify)	Nil	0	0	NA	0	0	NA

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

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

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate the positive/negative implications)
1	Climate Change	R	Rising instances of climate-change related disasters (such as cyclones, flooding, sea level rise, and heat stress) present physical risks (revenue vulnerability and increased costs from infrastructure damage and operational disruption) and transitional risks (evolving regulations and shift to a low-carbon economy)	<ol style="list-style-type: none"> 1. Structured long-term decarbonisation roadmap aligned with net-zero (2040) ambitions 2. Integrated climate resilience into asset planning based on Climate Change Vulnerability Assessments and adaptation planning 3. Expanded the use of renewable energy through captive solar and wind power plants, energy-efficient technologies (like mechanised bulk cargo handling and LED lighting), electric fleet (like electric internal transfer vehicles, electric reach stackers, e-mobile harbour cranes), and low-emission operational practices 	Negative Implications
2	Biodiversity and Land Use	R&O	Risk:Port and integrated logistics operations can cause habitat fragmentation, deforestation and coastal erosion, leading to habitat loss for animals, degradation of the marine ecosystem and decline in species diversity. It may also impact the local community, whose livelihood is dependent on fishing. These can lead to regulatory constraints, reputational risk and project delays. Opportunity: Responsible biodiversity management enables sustainable growth (ecosystem and climate stability, food security), ensuring license to operate and strengthening reputation.	<ol style="list-style-type: none"> 1. Committed to Net Positive Impact (NPI) on biodiversity by 2050, supported by Environment and Social Management Plans (ESMPs) aligned with CII's India Business and Biodiversity Initiative (IBBI); i.e. Dhamra follow's IUCN's lighting and dredging protocol to protect endangered Ridley turtles and dolphins 2. Oil spill preparedness at ports aligned with National Oil Spill Disaster Contingency Plan (NOS-DCP) and the International Petroleum Industry Environmental Conservation Association (IPIECA) 3. Adhering to global biodiversity protection practices with location-specific Biodiversity Management Plans for Mundra, Dhamra, Hazira, and Vizhinjam, in accordance with IFC Performance Standards and the Equator Principles⁴. Focused measures around natural habitat protection (threat monitoring and avoiding developments in eco-sensitive areas) and restoration (afforestation) 	Positive Implications

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate the positive/negative implications)
3	Occupational Health & Safety (OHS)	R	Human rights violations across operations and the value chain can result in regulatory penalties, operational disruption, reputational damage, and adverse ESG and credit implications.	<ol style="list-style-type: none"> Safety Management System, covering Group/Business/Site OHS guidelines, governance model, standard operating procedures, RACI (responsible, accountable, consulted, and informed) matrix, strategic goals and objectives alongside ten lifesaving safety rules Emphasised Process Safety Management (PSM) and cultivated safety leadership across all organisational levels Regular safety training, audits, inspections, and incident investigations Focussed measures like zero harm, deployment of emergency preparedness and response protocols, hazard identification and contractor safety management 	Negative Implications

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the Policies, if available									
Directors Familiarization Programme	✓			✓					
Code of Conduct	✓	✓	✓	✓	✓	✓	✓	✓	✓
Material Events Policy	✓			✓					
Nomination & Remuneration Policy	✓								
Supplier Code of Conduct		✓	✓	✓	✓	✓			✓
Working Hours Guidelines	✓		✓						
Environmental Policy		✓				✓			
Code of Conduct Guidelines	✓	✓	✓	✓	✓	✓	✓	✓	✓
Cyber Security Policy				✓					✓

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Diversity Equity & Inclusion Guidelines			✓		✓				
Anti-Bribery & Anti-Corruption Guidelines	✓						✓		
Human Rights Guidelines			✓	✓	✓				
Water Stewardship Policy		✓				✓			
Stakeholder Engagement Policy				✓					
Energy & Emission Policy		✓				✓			
Board Diversity Policy	✓								
Occupational Health & Safety Policy		✓	✓						
Sustainable Procurement Policy		✓	✓	✓	✓	✓			✓
Biodiversity Policy		✓				✓			
Policy on Prevention of Sexual Harassment			✓		✓				
Terms and conditions of appointment of Independent Directors	✓								
BRR Policies	✓								
Code of Fair Disclosure of UPSI	✓								
CSR Policy									
Dividend Distribution & Shareholder Return Policy	✓								
Guidelines for Employment of Differently abled People			✓	✓	✓			✓	
Policy on Material Subsidiary	✓			✓					
Policy of Related Party Transactions for Acquiring and Sale of Assets	✓								
Policy on Preservation of Documents	✓						✓		
Website Content Archival Policy	✓								
Whistle Blower Policy	✓		✓	✓			✓		✓
Insider Trading Code	✓						✓		
Policy for Procedure of Inquiry in case of leak or suspected leak of UPSI	✓								
Related Party Transaction	✓								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes, APSEZ's Code of Conduct and Sustainable Procurement Policy and supplier code of conduct Guidelines cover key aspects of APSEZ's policies related to its value chain partners.								
4. Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	ISO 14001: 2015 ISO 28000:2017 ISO 9001:2015 ISO 45001: 2018 ISO 50001:2018 IFC Performance Standard GRI UNGC CEO Water Mandate IBBI & IUCN								

<p>5. Specific commitments, goals and targets set by the entity with defined timelines, if any.</p>	<p>P3: Employees:</p> <ul style="list-style-type: none"> - Zero fatalities and Zero Incidents by 2030 - Employee Turnover: <8% Voluntary Attrition by 2030 - 10% women in the workforce by 2030 <p>P4: Stakeholder Engagement:</p> <ul style="list-style-type: none"> - Employee net promotor score of 8.5 by 2030 - Supplier Satisfaction Rate of 4.5/5 by 2030 - Customer Satisfaction Rate of 4.5/5 by 2030 <p>P6: Energy & Emission:</p> <ul style="list-style-type: none"> - 20% Energy intensity reduction by 2030 - 50% Emission intensity reduction by 2030 - 100% RE share in total electricity by 2030 <p>P6: Water and Waste:</p> <ul style="list-style-type: none"> - 20% Water consumption intensity reduction - Zero waste to landfill 16 ports by 2030. - Zero Unauthorized Waste Disposal (ZUWD) - Zero Effluent Discharge (ZED)
<p>6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.</p>	<p>P3: Employees: Number of fatalities in FY 2025-2026= 4 Number of LTI = 29 Voluntary attrition rate = 9% % of women workforce as of FY 2025-26= 6%</p> <p>P4: Stakeholder Engagement: Employee Satisfaction Rate in FY 2025-26= eNPS score 8.3 Supplier Satisfaction Rate in FY 2025-26= 4.3/5 Customer Satisfaction Rate in FY 2025-26= 4.5/5</p> <p>P6: Environment</p> <p>Energy & Emission:</p> <p>RE share in total electricity FY 2025-26– Target: 25% FY 2025-26– Status: 28%</p> <p>Energy intensity reduction FY 2025-26– Target: 10% FY 2025-26– Status: 17%</p> <p>Waste and Water:</p> <p>Zero waste to landfill FY 2025-26– Target: 12 sites FY 2025-26– Status: 12 sites</p> <p>Water consumption intensity reduction FY 2025-26– Target: 10% FY 2025-26– Status: 20%</p>
<p>7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)</p>	<p>Refer the CEO statement in integrated report</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

10. Details of Review of NGRBCs by the Company:

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

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

Yes, TUV India Pvt Ltd.

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

SECTION C: PRINCIPLE WISE PERFORMANCE

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

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

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	5	i) Update on Capital Markets and Adani Airports ii) An overview of ESG Bravus Australia & ESG Global Trends iii) Credit summary, Hydrogen Business & Data Centre site visit iv) Update on Business, Strategic Direction, Technology & Human Resources v) Credit Summary, ABEX Assurance & Renewable Site visit	100%
Key Managerial Personnel	9	Sustainability, Human Rights, Employee Well-being, Ethics & Governance	100%
Employees other than BoD and KMPs	258	Sustainability, Human Rights, Employee Well-being, Ethics & Governance, Stakeholder Engagement, Inclusive Development, Consumer Responsibility	65.88%
Workers	448	Human Rights, Employee Well-being, Ethics & Governance, Stakeholder Engagement	75.99%

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

Monetary

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

Non-Monetary

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

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

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

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

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

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

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

Particulars	FY 2025-26	FY 2024-25
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

Particulars	FY 2025-26		FY 2024-25	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	Nil	0	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	Nil	0	Nil

7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.
Not Applicable

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

Particulars	FY 2025-26	FY 2024-25
Number of days of accounts payables	63	82

9. Open-ness of business

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

Parameter	Metrics	FY 2025-26	FY 2024-25
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	0	0
	b. Number of trading houses where purchases are made from	0	0
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0	0
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	0	0
	b. Number of dealers / distributors to whom sales are made	0	0
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	0	0
Share of RPTs	a. Purchases (Purchases with related parties / Total Purchases)	18.07%	11.3%
	b. Sales (Sales to related parties / Total Sales)	19.80%	16.43%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	27.94%	28.84%
	d. Investments (Investments in related parties / Total Investments made)	66.56%	72.19%

Leadership Indicators

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
80	<ol style="list-style-type: none"> 1. ESG introduction 2. Supplier code of conduct 3. Human Rights 4. Sustainable procurement policy 5. Best available technology sharing 	75%

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

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

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

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

Essential Indicators

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

	Current FY 2025-26	Previous FY 2024-25	Details of improvements in environmental and social impacts
R&D*	0	0	Not Applicable
Capex	8%	11%	Refer ESG Investment section

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

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

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

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

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

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

In FY2025-26, All suppliers of APSEZL must declare their commitments to APSEZ's sustainability expectations during registration and sign off work orders. 100% of APSEZ's inputs are sourced from suppliers who commit to its guiding principles by providing declarations during the vendor onboarding /registration phase.

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

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

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

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

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

Other Waste: APSEZL has initiated 'Zero Waste to Landfill' (ZWL) initiative for non-hazardous waste as we are committed towards responsible waste disposal practices, and we have implemented the 5R approach (Reduce, Reuse, Recycle, Recover, and Reprocess) across all our facilities. As part of the ZWL initiative 12 of our ports have achieved Zero Waste to Landfill certification. Essential measures taken towards effective waste management are:

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

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

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

Leadership Indicators

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

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

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

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

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2025-26	FY 2024-25
Plastic Waste	1%	4%

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

	FY 2025-26			FY 2024-25		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)			NA			NA
E-waste						
Hazardous waste						
Other waste						

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

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

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

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

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	2,332	2,332	100.00	2,332	100.00	NA	NA	2,332	100.00	0	0.00
Female	158	158	100.00	158	100.00	158	100.00	NA	NA	0	0.00
Others	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	2,490	2,490	100.00	2,490	100.00	158	6.35	2,332	93.65	0	0.00
Other than Permanent Employees											
Male	82	82	100.00	82	100.00	NA	NA	82	100.00	0	0.00
Female	15	15	100.00	15	100.00	15	100.00	NA	NA	0	0.00
Others	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	97	97	100.00	97	100.00	15	15.46	82	84.54	0	0.00

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Workers											
Male	831	831	100.00	831	100.00	NA	NA	831	100.00	0	0.00
Female	51	51	100.00	51	100.00	51	100.00	NA	NA	0	0.00
Others	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	882	882	100.00	882	100.00	51	5.78	831	94.22	0	0.00
Other than Permanent Workers											
Male	45,227	45,227	100.00	45,227	100.00	NA	NA	45,227	100.00	0	0.00
Female	2,126	2,126	100.00	2,126	100.00	2,126	100.00	NA	NA	0	0.00
Others	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	47,353	47,353	100.00	47,353	100.00	2,126	4.49	45,227	95.51	0	0.00

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

	FY 2025-26	FY 2024-25
Cost incurred on well-being measures as a % of total revenue of the company	0.06%	0.03%

FY25 figures revised as per the latest guidance

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

Benefits	FY 2025-26			FY 2024-25		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. Of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	100	Y	100	100	Y
Gratuity	100	100	Y	100	100	Y
ESI	100	100	Y	100	100	Y
Others – please specify	NA	NA	NA	NA	NA	NA

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

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

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

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

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

Weblinks:

Diversity Equity & Inclusion guidelines:

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

Guidelines for Employment of Differently abled people:

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

5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100	84.62	100	66.67
Female	66.67	100	NA	NA
Others	NA	NA	NA	NA
Total	97.10	84.62	100	66.67

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

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

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

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

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

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

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

Category	FY 2025-26			FY 2024-25		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. Of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	2,490	495	19.88	2,788	0	0.00
- Male	2,332	440	18.87	2,714	0	0.00
- Female	158	55	34.81	74	0	0.00
- Others	0	0	0.00	0	0	0.00

Category	FY 2025-26			FY 2024-25		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. Of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Workers	882	624	70.75	330	0	0.00
- Male	831	568	68.35	329	0	0.00
- Female	51	56	109.80	1	0	0.00
- Others	0	0	0.00	0	0	0.00

8. Details of training given to employees and workers:

Category	FY 2025-26 Current Financial Year					FY 2024-25 Previous Financial Year				
	Total (A)	On Health & safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	2,414	2,414	100.00	1,722	71.33	2,804	2,695	96.11	2,626	93.65
Female	173	173	100.00	72	41.62	78	74	94.87	78	100.00
Others	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Total	2,587	2,587	100.00	1,794	69.35	2,882	2,769	96.08	2,704	93.82
Workers										
Male	46,058	46,058	100.00	3,235	7.02	40,409	17,786	44.01	7,941	19.65
Female	2,177	2,177	100.00	3	0.14	1,963	120	6.11	100	5.09
Others	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Total	48,235	48,235	100.00	3,238	6.71	42,372	17,906	42.26	8,041	18.98

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

Category	FY 2025-26			FY 2024-25		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
EMPLOYEES						
Male	2,414	2,414	100.00	2,804	2,804	100.00
Female	173	173	100.00	78	78	100.00
Others	0	0	0.00	0	0	0.00
Total	2,587	2,587	100.00	2,882	2,882	100.00
WORKERS						
Male	46,058	46,058	100.00	40,409	40,409	100.00
Female	2,177	2,177	100.00	1,963	1,963	100.00
Others	0	0	0.00	0	0	0.00
Total	48,235	48,235	100.00	42,372	42,372	100.00

10. Health and safety management system:

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

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

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

Process: APSEZL has established and aligned globally recognized high level Safety Intervention and Risk Assessment programs such as Safety Interaction (SI), Vulnerability Safety Risks (VSR), Site Risk Field Audits (SRFA), Process Hazard Analysis (PHA), and Prestart up Safety Review (PSSR) with Business specific Integrated Management System based Hazard Identification and Risk Assessment Process (HIRA) and Job Safety Analysis (JSA). The Company has adopted this framework and the reporting businesses have developed an ecosystem of participative and consultative approach for engaging concerned stakeholders, including employees, associates, and contract workforce. The Company recognizes that the dynamic risks need to be managed and mitigated as per the Hierarchy of Control to protect its stakeholders and achieve the objective of Zero Harm with enablement of Sustainable Growth. These interventions bring together an understanding of the potential upside and downside of all job and personal factors which can impact the organization with an objective to prevent injury, protect assets and add maximum sustainable value to all the activities and processes of the organization.

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

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

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

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

safety performance. Employees and workers can also report incidents and inaction on the safety incident through a formal whistle blower portal, the details of which are displayed at each site.

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

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

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

Safety Incident/Number	Category	FY 2025-26	FY 2024-25
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0.02
	Workers	0.21	0.26
Total recordable work-related injuries	Employees	0	2
	Workers	29	22
No. of fatalities	Employees	0	0
	Workers	4	6
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

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

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

Category	FY 2025-26			FY 2024-25		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	NA	0	0	NA
Health & Safety	0	0	NA	0	0	NA

14. Assessments for the year: FY 2025-26

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

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

All incidents are investigated thoroughly as per APSEZL Safety Guidelines on Incident Reporting & Investigation and learning is shared across sites to ensure non-occurrence of similar incidents. Also, employees and workers are encouraged to report the maximum number of unsafe acts and conditions to eliminate such incidents. Please refer to IR page no. 270 for safety incidents and corrective actions taken.

Leadership Indicators

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

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

(B) Workers: Yes

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

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

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

Category	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2025-26	FY 2024-25	FY 2025-26	FY 2024-25
Employees	0	0	0	0
Workers	4	6	0	0

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

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

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	75% of supply chain partners were assessed for health and safety in FY 2025-26
Working Conditions	75% of supply chain partners were assessed for working conditions in FY 2025-26

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

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

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

Essential Indicators

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

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

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

Our stakeholder groups have been majorly classified as:

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

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

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

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

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

Leadership Indicators

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

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

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

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

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

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

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

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

The Company identifies the disadvantaged, vulnerable and marginalized stakeholders on an on-going basis. Any new proposed project or expansion is mapped by engaging the stakeholder proactively, specifically via CSR activities. A comprehensive stakeholder management and grievance mechanism exists at all our locations. Company engages with the disadvantaged, vulnerable and marginalized stakeholders through various CSR programs with an aim to empower women and make them financially independent and also develop their skills towards leadership and economic enhancement. Various CSR initiatives undertaken for farmers, women, students, unemployed youth, etc. Please refer to the CSR section of our Annual Integrated Report FY 2025-26 (page no. 277) for more details.

PRINCIPLE 5: Businesses should respect and promote human rights.

Essential Indicators

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

Category	FY 2025-26			FY 2024-25		
	Total (A)	No. employees of workers covered (B)	% (B/A)	Total (A)	No. employees of workers covered (B)	% (B/A)
Employees						
Permanent	2,490	1,483	59.56	2,788	2,468	88.52
Other than permanent	97	0	0.00	94	0	0.00
Total Employees	2,587	1,483	57.33	2,882	2,468	85.63
Workers						
Permanent	882	0	0.00	330	0	0.00
Other than permanent	47,353	18,010	38.03	42,042	1,279	3.04
Total Workers	48,235	18,010	37.34	42,372	1,279	3.02

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

Category	FY 2025-26					FY 2024-25				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	2,490	0	0.00	2,490	100.00	2,788	0	0.00	2,788	100.00
Male	2,332	0	0.00	2,332	100.00	2,714	0	0.00	2,714	100.00
Female	158	0	0.00	158	100.00	74	0	0.00	74	100.00
Female	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Other than Permanent	97	0	0.00	97	100.00	94	0	0.00	0	0.00
Male	82	0	0.00	82	100.00	90	0	0.00	0	0.00
Male	15	0	0.00	15	100.00	4	0	0.00	0	0.00
Female	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Workers										
Permanent	882	0	0.00	882	100.00	330	0	0.00	0	0.00
Male	831	0	0.00	831	100.00	329	0	0.00	0	0.00
Male	51	0	0.00	51	100.00	1	0	0.00	0	0.00
Female	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Other than Permanent	47,353	0	0.00	47,353	100.00	42,042	0	0.00	0	0.00
Male	45,227	0	0.00	45,227	100.00	40,080	0	0.00	0	0.00
Male	2,126	0	0.00	2,126	100.00	1,962	0	0.00	0	0.00
Female	0	0	0.00	0	0.00	0	0	0.00	0	0.00

3. Details of remuneration/salary/wages

a. Median remuneration / wages:

(₹ in lakhs)

Particulars	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	8	57.04	1	55.80
Key Managerial Personnel	4	911	0	NA
Employees other than BoD and KMP	2410	12.81	173	10.44
Workers	883	109.68	51	121.44

Note: Details are as of March 31, 2026

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

	FY 2025-26	FY 2024-25
Gross wages paid to females as % of total wages	6.98	1.62

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

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

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

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

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

Category	FY 2025-26 Current Financial Year			FY 2024-25 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour/Involuntary Labour	0	0	NA	0	0	NA
Wages	0	0	NA	3	0	NA
Other human rights related issues	0	0	NA	0	0	NA

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

Parameter	FY 2025-26	FY 2024-25
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Average number of female employees/workers at the beginning of the year and as at end of the year	2,350	2,041
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

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

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

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

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

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

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

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

10. Assessments for the year:

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

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

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

Fair Wages

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

Health & Safety

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

Forced Labour

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

Discrimination & harassment

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

Leadership Indicators

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

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

- a. Adani Group policy on Human Rights
- b. Human Rights Guidelines

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

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

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

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

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

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

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

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	75%
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others – please specify	-

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

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

- a. A responsible recruitment procedure
- b. Due diligence and screening process
- c. Clear contract with agencies
- d. Training for management and workers
- e. Grievance mechanism

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

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

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

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

Essential Indicators

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

Parameter	UOM	FY 2025-26	FY 2024-25
Revenue from operations (in Cr Rs.)		38,735.77	30,475.33
From renewable sources			
Total electricity consumption (A)	TJ	530.96	282.83
Total fuel consumption (B)	TJ	0.00	0.00
Energy consumption through other sources (C)	TJ	0.00	0.00
Total energy consumed from renewable sources (A+B+C)	TJ	530.96	282.83
From non-renewable sources			
Total electricity consumption (D)	TJ	1,380.64	1,509.12
Total fuel consumption (E)	TJ	2,068.54	1,997.73
Energy consumption through other sources (F)	TJ	0.00	0.00
Total energy consumed from non- renewable sources (D+E+F)	TJ	3,449.18	3,506.85
Total energy consumed (A+B+C+D+E+F)	TJ	3,980.14	3,789.68
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	TJ/INR	0.0000000103	0.0000000124
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	TJ/USD Million PPP Adj	0.208996	0.256184
Energy intensity in terms of physical output	TJ/MMT	7.95	8.42
Energy intensity (optional) – the relevant metric may be selected by the entity			

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

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

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

Parameter	UOM	FY 2025-26	FY 2024-25
Water withdrawal by source (in kilolitres)			
(i) Surface water	KL	23,00,879.41	19,88,434.00
(ii) Groundwater	KL	4,06,422.51	4,12,709.00
(iii) Third party water	KL	18,77,764.00	21,61,827.00
(iv) Seawater / desalinated water	KL	16,27,236.97	21,21,371.00
(v) Others	KL	16,43,242.00	11,11,378.00
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	KL	78,55,544.89	77,95,719.00
Total volume of water consumption (in kilolitres)	KL	77,17,746.68	76,72,982.00
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	KL/INR	0.0000199241	0.0000251777
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	KL/USD Million PPP Adj	405.255833	520.171282
Water intensity in terms of physical output	KL/MMT	15,410.84	17,043.50
Water intensity (optional) – the relevant metric may be selected by the entity			

4. Provide the following details related to water discharged:

Parameter	UOM	FY 2025-26	FY 2024-25
Water discharge by destination and level of treatment (in kilolitres)			
(i) To Surface water		0	0
- No treatment		0	0
- With treatment – please specify level of treatment		0	0
(ii) To Groundwater		0	0
- No treatment		0	0
- With treatment – please specify level of treatment		0	0
(iii) To Seawater		0	0
- No treatment		0	0
- With treatment – please specify level of treatment		0	0
(iv) Sent to third-parties		0	0
- No treatment		0	0
- With treatment – please specify level of treatment		0	0
(v) Others		0	0
- No treatment		0	0
- With treatment – please specify level of treatment		0	0
Total water discharged (in kilolitres)		0	0

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

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

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

Parameter	UOM	FY 2025-26	FY 2024-25
NOx	µg/m ³	22.94	16.57
SOx	µg/m ³	17.69	13.54
Particulate matter (PM)	µg/m ³	65.48	46.43
Persistent organic pollutants (POP)	µg/m ³	-	-
Volatile organic compounds (VOC)	µg/m ³	-	-
Hazardous air pollutants (HAP)	mg/Nm ³	-	-
Others – please specify		-	-

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

Parameter	UOM	FY 2025-26	FY 2024-25
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	1,58,998.00	1,50,398.25
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	2,82,689.55	3,23,098.43
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO ₂ equivalent/ INR	0.0000011403	0.0000015537
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	Metric tonnes of CO ₂ equivalent/ USD Million PPP Adj	23.192839	32.099442
Total Scope 1 and Scope 2 emission intensity in terms of physical output	tCO ₂ e/MMT	881.96	1,051.75
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity			

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

Refer our climate change report section of IR from page 150 - 172

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

Parameter	FY 2025-26	FY 2024-25
Total Waste generated (in metric tonnes)		
Plastic waste (A)	313	318
E-waste (B)	51	58
Bio-medical waste (C)	10	15
Construction and demolition waste (D)	235	165
Battery waste (E)	166	37
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any.(G)	6,432	5,975
Other Non-hazardous waste generated(H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	7,152	5,777
Total (A+B + C + D + E + F + G + H)	14,360	12,345
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) (MT/INR Cr)	0.370690966	0.405066522
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) (MT/USD Million PPP Adj)	0.753985	0.83673
Waste intensity in terms of physical output (MT/MMT)	28.7	27.4
Waste intensity (optional) – the relevant metric may be selected by the entity		
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	7,143	4,708
(ii) Re-used	534	539
(iii) Other recovery operations	3,862	4,044
Total	11,539	9,291
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	374	600
(ii) Landfilling	169	2,088
(iii) Other disposal operations	2,277	366
Total	2,821	3,053

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

APSEZL, being in the service industry (i.e., provides services for cargo handling & logistics, operations & maintenance of port sector) does not produce any products using hazardous and toxic chemicals. As such, we don't have potential to recycle generated waste in our operations. However, APSEZL complies with all the applicable regulatory requirements pertaining to waste management.

We dispose of our waste in an environmentally friendly manner through CPCB / SPCB registered CHWIF/ TSDF or authorized recyclers. As we move towards our vision of Zero Waste to landfill at all sites, several initiatives have been implemented in the handling and management of hazardous and non-hazardous waste at all operating

port locations by focusing on 5R principles of waste management i.e., Reduce, Reuse, Reprocess, Recycle and Recover. Essential measures we take towards effective waste management:

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

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

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

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

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
EC for Mundra SEZ for development of 1576.81 ha Industrial Park/SEZ at Siracha, Navinal, Dhruv, Mundra, Baroi, Goarsama, Luni, Bhadreshwar villages, Mundra Tehsil, Kutch District, Gujarat	SO 1533	14 th Sep, 2006 and its amendment thereafter	Yes through NABET accredited consultant	Yes	Welcome to PARIVESH

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Environmental & CRZ Clearance for Change in Cargo Mix for Development of Liquid Cargo Storage and Handling within Adani Gangavaram Port at Pedagantyada Mandal, Visakhapatnam District	SO 1533	14 th Sep, 2006 and its amendment thereafter	Yes, by NABET accredited consultant	Yes	Welcome to PARIVESH
Environmental & CRZ Clearance for Construction of balance work of Dighi Port, in Taluka Murud and Taluka Shrivardhan, District Raigad, Maharashtra by Dighi Port Ltd.	SO 1533	14 th Sep, 2006 and its amendment thereafter	Yes, by NABET accredited consultant	Yes	Welcome to PARIVESH
EC & CRZ clearance for the Development of Multi Cargo Port with supporting utilities and infrastructure facilities at Hazira, Surat, Gujarat	SO 1533	14 th Sep, 2006 and its amendment thereafter	Yes, by NABET accredited consultant	Yes	Welcome to PARIVESH

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India, such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

Yes, APSEZ is complying with all the conditions stipulated in EC & CRZ Clearance as well as CtE/CtO. Half yearly EC & CRZ Clearance Compliance reports are being submitted to all the concerned regulatory authorities and the same is being uploaded on Parivesh Portal as well as Adani Ports website <https://www.adaniports.com/Downloads>

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

Leadership Indicators

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

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

Parameter	FY 2025-26	FY 2024-25
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	79,213	98,497
(iii) Third party water	0	100
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres)	79,213	98,597
Total volume of water consumption (in kilolitres)	79,124	98,123
Water intensity per rupee of turnover (Water consumed / turnover) (KL/INR Cr)	2.04	3.03
Water intensity (optional) – the relevant metric may be selected by the entity		
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) Into Groundwater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) Into Seawater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (in kilolitres)	0	0

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

Parameter	UOM	FY 2025-26	FY 2024-25
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	20,13,014	20,05,650
Total Scope 3 emissions per rupee of turnover	tCO ₂ e / INR Cr	52	62
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			

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

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

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

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

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

Yes, APSEZ has "Onsite Emergency plan & Disaster Control" measure in place, focusing on business continuity to address disruptive events like Oil spillage, fire, cyber-attacks, acts of terror, etc. The practices have been developed through benchmarking against best practices at other organizations with mature Business Continuity Management practices. All our ports have on-site and off-site disaster management plans in place. The same is submitted to MOEF & CC as part of the half yearly EC & CRZ compliance report.

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

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

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

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

75% of value chain partners were assessed for environmental impacts. Details of assessment of value chain partners for assessed for ESG has been provided under Supplier section in our Integrated Annual Report FY2025-26.

8. How many Green Credits have been generated or procured:

- a. By the listed entity - 0
- b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners - 0

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

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations:

13

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

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Indian Maritime Centre (IMC)	National
2	World Economic Forum (WEF)	National
3	Federation of Indian Chamber of Commerce and Industry (FICCI)	National
4	Quality Circle Forum of India (QCFI)	National
5	The Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
6	Federation of Indian Export Organizations (FIEO)	National
7	Confederation of Indian Industry (CII)	National
8	Indian Private Ports and Terminals Association (IPPTA)	National
9	Centre for Transportation Research and Management (CTRAM)	National
10	Federation of Kutch Industries associations (FOKIA)	State

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

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

Leadership Indicators

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

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
1	Harit Sagar, The Green Port Guidelines 2023	Internal communication	No	Quarterly	N/A
2	Indian Ocean Conference – India Foundation	Formal participation and dialogues towards new horizons of maritime partnership	Yes	Others – please specify	https://indianocean.indiafoundation.in/wp-content/uploads/2025/02/indianocean-8con.pdf
3	Confederation of Indian Industry	Dialogues related to blue economy; participation in consultation process	No	Annually	N/A
4	India–Middle East–Europe Economic Corridor (IMEC) Ports Club	Partnership with Port of Marseille Fos to deepen trade facilitation, port innovation, and energy transition	Yes	Others – please specify	https://www.adani.com/newsroom/media-releases/adani-ports-and-sez-and-port-of-marseille-fos-sign-strategic-imec-partnership

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

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

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

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

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

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

The Company's grievance reporting initiatives comprised a 24x7 grievance reporting mechanism through its website, dedicated telephone numbers and drop boxes at prominent locations. Several people across the company's sites (supervisors, seniors, and department heads) can be reached directly for reporting grievances. The Company provides communities with a grievance reporting system (recorded, reviewed, escalated, and actioned upon within a timeframe). A Grievance Management System was implemented for the aggrieved to view status, resolution, and feedback. The Company is further in the process of developing and rolling out of an integrated Grievance Management System wherein all types of grievance will feed into one integrated system.

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

	FY 2025-26	FY 2024-25
Directly sourced from MSMEs/ small producers	35%	17%
Directly from within India	95%	78%

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

Location	FY 2025-26	FY 2024-25
Rural	3%	36%
Semi-urban	29%	23%
Urban	12%	5%
Metropolitan	56%	35%

Leadership Indicators

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

Details of negative social impact identified	Corrective action taken
Not Applicable	

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

S. No.	State	Aspirational District	Amount spent (In INR)
1	Andhra Pradesh	Vishakhapatnam	9,59,35,833

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

Yes, APSEZL has a Sustainable Procurement Policy and Supplier Code of Conduct in place, which covers the aspect related to procurement/purchase from marginalized/vulnerable groups. APSEZL is driving economic development by enhancing procurement processes for social and environmental gains. The procurement focus was not just on local development but a range of accrued benefits of lower costs, higher brand recognition and livelihood support. Local vendors generally employ hundreds unlikely to leave that city, delivering benefits for the local economy in which they are based. Utilizing procurement more progressively and innovatively has facilitated the participation of small to medium sized enterprises (SMEs) in public procurement in support of common societal goals. For further details refer to the Supply Chain section of our Integrated Annual Report FY2025-26 (page no. 302).

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

Local/regional suppliers and Local communities.

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

During FY2025-26, 68% of the Company's procurement was derived from local State vendors and 27% from the same district.

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

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

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

Name of authority	Brief of the Case	Corrective action taken
NA		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Climate action Initiatives	1,01,224	25%
2	Community infrastructure development Initiatives	1,84,642	26%
3	Education initiatives	44,031	45%
4	Health initiatives	2,77,332	78%
5	Sustainable livelihood initiatives	22,925	47%

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

Essential Indicators

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

The company has formal mechanisms in place to collect feedback from the customers. The customers can reach out with their complaints related to our services or payment transactions through mail or online portal and a time-bound solution is provided to them. To report any grievance, we can be reached at Grievance.apsez@adani.com. Besides, APSEZL proactively engages with our customers regularly. We also carry out customer satisfaction surveys through the deployment of internal resources on an annual basis and covers feedback from customers across all port and logistics locations. Based on the feedback, necessary process improvements are undertaken as a part of standard management systems.

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

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

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

	FY 2025-26			FY 2024-25		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0	Nil	0	0	Nil
Advertising	0	0	Nil	0	0	Nil
Cyber-security	0	0	Nil	0	0	Nil
Delivery of essential services	0	0	Nil	0	0	Nil
Restrictive Trade Practices	0	0	Nil	0	0	Nil
Unfair Trade Practices	0	0	Nil	0	0	Nil
Other	0	0	Nil	0	0	Nil

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

Number	Reasons for recall
Voluntary recalls	Not Applicable
Forced recalls	

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

Yes, APSEZL has a Cyber Security Policy: <https://www.adaniports.com/-/media/project/ports/investor/corporate-governance/policies/adani-cyber-security-policy.pdf> in place that covers all aspects of cyber risk for IT and business areas. We are committed to establishing and improving cyber security posture and minimizing our exposure to such risks. Please refer to the integrated report on page no. 330.

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

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

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

7. Provide the following information relating to data breaches:

- a. Number of instances of data breaches: 0
- b. Percentage of data breaches involving personally identifiable information of customers: 0
- c. Impact, if any, of the data breaches: There has been no such instance which has occurred during FY2025-26.

Leadership Indicators

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

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

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

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

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

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

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

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

Not Applicable

Independent Assurance Statement

To the Directors and Management,
Adani Ports & Special Economic Zone Limited (APSEZL),
Adani Corporate House, Shantigram,
Near Vaishno Devi Circle, S.G. Highway, Khodiyar,
Ahmedabad – 382421, Gujarat, India

Adani Ports & Special Economic Zone Limited (hereinafter referred to as “APSEZL” or the “Reporting Organization”) engaged TUV India Private Limited (“TUVI”) to conduct independent assurance of BRSR Core disclosures (09 attributes as per Annexure I – Format of BRSR Core), and KPIs of BRSR placed under (**Annexure II – BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORTING FORMAT**), along with reasonable assurance of the 09 BRSR principles covering Essential and Leadership Indicators. APSEZL developed the Business Responsibility and Sustainability Report (hereinafter “the BRSR”) for the period 01/04/2025 to 31/03/2026, based on the National Guidelines on Responsible Business Conduct (NGRBC) and applicable SEBI BRSR reporting requirements. This engagement was conducted as a **reasonable assurance engagement** in accordance with ISAE 3000 (Revised), specifically aligned with the SEBI BRSR Core – Framework for Assurance and ESG Disclosures for Value Chain and the Industry Standards on Reporting of BRSR Core. TUVI confirms that, prior to acceptance, the preconditions for the assurance engagement were assessed in accordance with ISAE 3000 (Revised). TUVI determined that the subject matter is supported by suitable criteria (SEBI BRSR Core framework), management has acknowledged its responsibility for the preparation and presentation of the sustainability information and for providing access to relevant records, and that sufficient appropriate evidence was expected to be available to support the assurance conclusion. The assurance process was conducted with reference to the following applicable frameworks and guidelines:

- i. Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, requiring disclosure of the Business Responsibility and Sustainability Report (BRSR);
- ii. The Industry Standards on Reporting of BRSR Core, as per SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177, dated 20/12/2024;
- iii. SEBI circular SEBI/HO/CFD/CMD-2/P/CIR/2021/562, dated 10/05/2021;
- iv. The SEBI notification SEBI/LAD-NRO/GN/2023/131, dated 14/06/2023, related to BRSR reporting requirements;
- v. The BRSR Core – Framework for Assurance and ESG Disclosures for the Value Chain, as stipulated by SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated 12/07/2023;
- vi. ESG disclosures for value chain and disclosures on green credits – SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42, dated 28/03/2025; and
- vii. Master Circular for Compliance with SEBI (LODR) Regulations, 2015 – HO/49/14/14(7)2025-CFD-POD2/I/3762/2026, last updated on 30/01/2026.

The assurance engagement comprised a **reasonable assurance engagement** over: (i) the BRSR Core indicators / nine attributes as per Annexure I – Format of BRSR Core, and (ii) the nine BRSR principles covering Essential and Leadership Indicators, in accordance with ISAE 3000 (Revised) and as mandated by the applicable regulatory frameworks referenced above.

Management’s Responsibility

APSEZL has developed the BRSR content and is responsible for identifying material ESG topics, determining relevant sustainability issues, and establishing processes for performance management, data management, and data quality.

APSEZL is responsible for the BRSR content relating to the 09 BRSR principles covering Essential and Leadership Indicators, and the BRSR Core disclosures as per Annexure I – Format of BRSR Core. Its management is accountable for the collection, analysis, preparation, and disclosure of information presented in the BRSR, whether in web-based or printed format.

APSEZL’s management ensures that the BRSR is prepared accurately with reference to the applicable criteria – the National Guidelines on Responsible Business Conduct (NGRBC), SEBI BRSR reporting requirements, and the SEBI BRSR Core framework – and is free from material misstatements. This responsibility includes maintaining the company’s website, complying with applicable laws, archiving and reproducing disclosed information, and making such data available to relevant stakeholders and regulatory authorities upon request.

Any partial reproduction of this assurance statement may lead to misinterpretation of its scope, procedures, and conclusions. Therefore, the assurance conclusion should be read in its entirety, together with the defined scope, methodology, limitations, and criteria described in this statement.

Scope and Boundary

The scope of this assurance engagement conducted by TUVI covered the verification of BRSR disclosures pertaining to the BRSR Core (09 attributes as per Annexure I – Format of BRSR Core) and all nine BRSR principles, including Essential and Leadership Indicators, as mandated under Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, which requires listed entities to include a BRSR as part of their Annual Report.

The assurance engagement included the following activities:

1. Review of General Disclosures, Management and Process Disclosures, and APSEZL’s responses to all nine BRSR principles;
2. Review and evaluation of the nine attributes specified under Annexure I – Format of BRSR Core, as disclosed in the BRSR;
3. Assessment of the quality, clarity, and completeness of the reported information; and
4. Verification of supporting evidence on a sample basis, involving: a) Reasonable assurance for the nine attributes as per the BRSR Core framework; and b) Reasonable assurance for Section A and B of the BRSR, covering all nine BRSR principles including the Essential and Leadership Indicators.

This approach ensured an assessment aligned with the principles of ISAE 3000 (Revised). Reasonable assurance was mandated by SEBI LODR Reg. 34(2)(f), the Industry Standards circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated 20/12/2024, and the Master Circular dated 30/01/2026, for both the BRSR Core nine attributes and the nine BRSR principles, providing an independent and objective evaluation of the reliability and accuracy of APSEZL's ESG disclosures.

TUVI has verified the Essential and Leadership Indicators listed below in accordance with the BRSR Principles. The verified KPIs correspond to disclosures made in the respective Principles and sections of the BRSR. The table below maps the verified indicators to the assurance level applied — Reasonable Assurance for all BRSR Core Annexure I attributes and all nine BRSR principles, including Essential and Leadership Indicators — in line with the ISAE 3000 (Revised) Assurance Standard. For quantitative indicators (e.g., BRSR Core Annexure I KPIs for GHG, energy, water, waste, wages, safety), the applicable criteria are the SEBI BRSR Core framework, Annexure I KPI definitions, and APSEZL's documented calculation methodologies. For qualitative Leadership Indicators (e.g., governance disclosures, policy commitments, management approaches under each of the nine BRSR principles), the applicable criteria are the NGRBC principles, SEBI BRSR reporting guidelines, and the respective BRSR principle requirements. Reasonable assurance procedures for qualitative Leadership Indicators included: cross-referencing disclosed policies and governance structures against supporting documentary evidence; verifying the existence and implementation of stated policies through management interviews and document review; and confirming that disclosed management approaches are consistent with the responses received during stakeholder interviews and the evidence reviewed.

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

Note: Disclosures reported as 'Not Applicable' are not included in the table above. **Note on Leadership Indicators Methodology:** Reasonable assurance over qualitative Leadership Indicators across the nine BRSR principles was performed through review of supporting governance evidence, including approved policies, board/committee records, training records, grievance logs, CSR records, supplier onboarding documents, management interviews and process walkthroughs. The procedures covered existence, implementation, consistency and completeness of disclosures against applicable BRSR criteria. Illustrative evidence reviewed included Code of Conduct, Whistleblower Policy, POSH records, Human Rights Policy, ESG Policy/ISO 14001 documents, CSR reports and MSME procurement records. Detailed evidence for each indicator is retained in TUVI's engagement workpapers.

TUVI has verified the below 09 attributes as per Annexure I – Format of BRSR Core disclosed in the BRSR with reference to the Industry Standards on Reporting of BRSR Core (SEBI circular dated 20/12/2024) as part of the applicable assurance criteria.

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

	Mixed metal (H) (MT)	
	Mixed Organic (I) (MT)	
	Total waste generated (A + B + C + D + E + F+G+H+I) (MT)	
	Waste intensity <ul style="list-style-type: none"> • MT / Rupee adjusted for PPP • MT /Cargo Handled (MMT) 	
	Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (MT)	
	Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (Intensity) <ul style="list-style-type: none"> ✓ Waste Recycled Recovered /Total Waste generated 	
	For each category of waste generated, total waste disposed by nature of disposal method (MT)	
	For each category of waste generated, total waste disposed by nature of disposal method (Intensity) <ul style="list-style-type: none"> ✓ Waste Recycled Recovered /Total Waste generated 	
	Enhancing Employee Wellbeing and Safety	Spending on measures towards well-being of employees and workers – cost incurred as a % of total revenue of the company - In % terms Details of safety related incidents for employees and workers (including contract-workforce e.g. workers in the company's construction sites) <ol style="list-style-type: none"> 1) Number of Permanent Disabilities 2) Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) 3) No. of fatalities
	Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid - In % terms Complaints on POSH <ol style="list-style-type: none"> 1) Total Complaints on Sexual Harassment (POSH) reported 2) Complaints on POSH as a % of female employees / workers 3) Complaints on POSH upheld
Enabling Inclusive Development	Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India - In % terms – As % of total purchases by value Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent /on contract) as % of total wage cost - In % terms – As % of total wage cost	
Fairness in Engaging with Customers and Suppliers	Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events - In % terms Number of days of accounts payable - (Accounts payable *365) / Cost of goods/services procured	
Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties <ol style="list-style-type: none"> 1) Purchases from trading houses as % of total purchases 2) Number of trading houses where purchases are made from 3) Purchases from top 10 trading houses as % of total purchases from trading houses 1) Sales to dealers / distributors as % of total sales 2) Number of dealers / distributors to whom sales are made 3) Sales to top 10 dealers / distributors as % of total sales to dealers / distributors Share of RPTs (as respective %age) in - <ul style="list-style-type: none"> • Purchases • Sales • Loans & advances • Investments 	

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

****Waste:** The data of total waste recovered through recycling, re-using or other recovery operations and total waste disposed by nature of disposal method was verified through site-level waste registers, weighbridge tickets, CPCB/SPCB returns, authorised recycler certificates, and third-party disposal manifests, supplemented by management interviews and on-site walkthroughs, providing sufficient appropriate evidence to support the reasonable assurance conclusion.

****Use of Estimates:** Certain BRSR Core KPIs, including energy consumption, water withdrawal, waste generation, and energy usage and corresponding GHG emissions for leased offices and employee-related activities, are based on estimates due to limitations in direct measurement. These estimates were derived using reasonable assumptions, headcount-based methodologies, Industry Standards on Reporting of BRSR Core, and industry-accepted factors. For such KPIs, our assurance procedures focused on evaluating the appropriateness and consistent application of estimation methodologies, the reasonableness of key assumptions, and the reliability of supporting data. The use of estimated data did not affect our reasonable assurance conclusion on the selected KPIs as a whole.

ISF Compliance Declaration: TÜV confirms that this assurance engagement has been conducted in compliance with the Industry Standards on Reporting of BRSR Core as specified in SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated 20/12/2024 and the Master Circular HO/49/14/14(7)2025-CFD-POD2/1/3762/2026 dated 30/01/2026. The nine BRSR Core attributes (Annexure I KPIs) and the nine BRSR principles covering Essential and Leadership Indicators, scope of reasonable assurance, assurance methodology, and reporting format adopted in this engagement are aligned with the applicable requirements of the said ISF circular and the Master Circular. A detailed clause-by-clause mapping of this assurance engagement against the ISF circular (SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177) requirements is included in the Management Report (Section 18 — Mapping report sections to SEBI requirements, and Appendix A through C).

Boundary Reconciliation: The ESG reporting boundary is consistent with the operational control approach adopted by APSEZL for financial reporting purposes, covering all entities and operations over which APSEZL exercises operational control. No material differences were identified between the financial reporting boundary (as per the audited consolidated financial statements for FY 2025–26) and the ESG reporting boundary applied in the BRSR. The reporting boundary includes APSEZL's integrated services in ports, logistics, port-based services and SEZ segment with 15 domestic and 2 international ports/terminals and corporate office. It also extends to its subsidiary Adani Logistics Limited (ALL), operating 8 warehouses, 12 logistics parks and 20 agri silos. APSEZL has 05 ports and one office outside India.

On-site verifications were conducted at,

1. The Dhamra Port Company Limited (“DPCL”): 08/12/2025 and 09/12/2025,
2. Adani Gangavaram Port Limited: 11/12/2025 and 12/12/2025,
3. Adani Krishnapatnam Port Limited (AKPL): 15/12/2025 and 16/12/2025,
4. Adani Vizhinjam Port Private Limited: 18/12/2025 and 19/12/2025,
5. Adani Hazira Port Limited, (AHPL): 22/12/2025 and 23/12/2025,
6. Adani Ports and Special Economic Zone Limited, Mundra: 24/12/2025 and 25/12/2025,
7. Adani Corporate House, Ahmedabad: 16/03/2026 to 18/03/2026.

The assurance activities were carried out together with a desk review of all remaining ports, terminals, logistics parks and offices as per the reporting boundary.

Limitations

Inherent Limitations: TUVI did not perform any assurance procedures on the prospective information disclosed in the BRSR, including targets, expectations, and ambitions, and therefore draws no conclusion on such information, value-chain KPIs (except Scope 3 GHG emissions), or any disclosure other than BRSR Core disclosures. During the assurance process, TUVI did not come across any limitation to the agreed scope. TUVI verified data on a sample basis; the responsibility for the authenticity of data entirely lies with APSEZL. TUVI has taken reference of the financial figures from the audited financial reports; financial figures are not assured under this engagement. APSEZL will be responsible for the appropriate application of financial data. The application of this assurance statement is limited w.r.t. SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated 12/07/2023 and Industry Standards on Reporting of BRSR Core, circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177, dated 20/12/2024 and the 09 BRSR principles covering Essential and Leadership Indicators in accordance with SEBI circular SEBI/HO/CFD/CMD-2/P/CIR/2021/562 dated 10/05/2021, as defined in the scope above.

Out of Scope Items: For the avoidance of doubt, the following disclosures in the BRSR are explicitly outside the scope of this assurance engagement and carry no assurance conclusion: (i) forward-looking statements, ESG targets, ambitions, and projections; (ii) financial figures referenced in the BRSR (sourced from audited financial statements but not independently assured under this engagement); (iii) voluntary disclosures beyond the defined BRSR Core Annexure I KPIs and nine BRSR principle indicators listed in the scope table above; and (iv) disclosures marked ‘Not Applicable’ by APSEZL. Readers should not place reliance on the items listed above as assured information.

A KPI-specific materiality approach was applied comprising two tiers: (i) a 5% quantitative threshold relative to the applicable KPI base value for volume-based KPIs (GHG emissions, energy, water, waste, and wages); and (ii) a qualitative zero-tolerance threshold for high-risk ESG indicators — fatalities, permanent disabilities, POSH complaints upheld, regulatory non-compliances, and customer data breaches — where any occurrence is treated as material irrespective of magnitude. This assurance statement does not endorse any environmental and social claims or advertisements by the Reporting Organization. The rationale for the 5% threshold by KPI category is as follows: GHG emissions — 5% reflects IPCC/GHG Protocol rounding tolerance and the aggregation uncertainty across multiple emission sources and sites; Energy — 5% reflects meter-reading and billing reconciliation tolerance across diverse port operations; Water — 5% reflects source-level measurement uncertainty for groundwater and third-party supply data; Waste — 5% reflects weighbridge tolerance and categorisation variability across waste streams. For KPIs where estimation is applied, a confidence range of ±10% has been applied to reflect this inherent estimation uncertainty in the underlying measurement and calculation methodologies only. This confidence range is a characteristic of the subject matter itself and does not modify, qualify, or dilute the overall reasonable assurance conclusion expressed in this statement. TUVI's reasonable assurance conclusion applies to whether the reported estimated KPIs are free from material misstatement within the accepted bounds of such estimation methodologies. This assurance statement is not intended to support, and should not be used in connection with, any greenwashing or misleading environmental or social claims. This assurance statement should be read in its entirety.

Our Responsibility

Terminology Note: Throughout this assurance statement, the terms “Reporting Organization”, “Report”, “Sustainability Report and BRSR”, and “Sustainability Information” are used consistently and interchangeably to refer to APSEZL's Business Responsibility and Sustainability Report (BRSR) and associated sustainability disclosures for FY 2025-26. These terms are harmonized across all assurance documents issued for this engagement. TUVI's responsibility in relation to this engagement is to perform a reasonable level of assurance over the 09 BRSR principles covering Essential and Leadership Indicators and the 09 attributes as per Annexure I – Format of BRSR Core, and to express a conclusion based on the work performed. Our engagement did not include an assessment of the adequacy or effectiveness of APSEZL's strategy, management of ESG-related issues, or the sufficiency of the BRSR against BRSR reporting principles, other than those mentioned in the scope of the assurance. TUVI's responsibility regarding this verification is in reference to the agreed scope of work, which includes assurance of non-financial quantitative and qualitative information disclosed by APSEZL. Data is verified on a sample basis; the responsibility for the authenticity of data lies entirely with the Reporting Organization, which is also responsible for archiving the related data for a reasonable time period.

The primary intended users of this assurance statement are APSEZL's management, Board, shareholders, and regulators. TUVI expressly disclaims any liability or co-responsibility: (1) for any decision a person or entity would make based on this assurance statement, and (2)

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for any damages in case of erroneous data reported. This assurance engagement is based on the assumption that the data and information provided to TÜVINDIA by APSEZL are complete and true.

Assurance Methodology

During the assurance engagement, TÜVINDIA adopted a risk-based approach, focusing verification efforts on disclosures and issues of high material relevance to APSEZL and its stakeholders. TÜVINDIA assessed the robustness of the underlying data management systems, information flows, and controls. TÜVINDIA's assurance activities included:

1. Document and Data Review

- i. Examination of documents, datasets, and supporting evidence provided by APSEZL for Section A and B of the BRSR, covering all nine BRSR principles, including Essential and Leadership Indicators, as well as the nine attributes listed in Annexure I – Format of BRSR Core.
- ii. Evaluation of disclosures related to Management Approach and performance indicators.

2. Stakeholder Interviews

- i. Conducted interviews with key representatives, including data owners, process managers, and decision-makers across various departments and port operations of APSEZL.
- ii. Interviews were conducted through both onsite visits and remote assessments, as applicable.

3. Process and System Assessment

- i. Review of systems and processes for implementing ESG and sustainability-related policies, and for collecting, managing, and reporting quantitative and qualitative data for the reporting period.
- ii. Assessment of data management systems and internal processes supporting ESG disclosures, including review of data flows, aggregation procedures, and supporting records. This review does not constitute an assessment of, or opinion on, the design adequacy or operating effectiveness of IT general controls or ESG application controls.

4. Substantive and Control Testing

TÜVINDIA performed walkthrough procedures to understand ESG data flows and substantive testing including document verification, recalculation, analytical review, and data traceability checks for selected KPIs. Examples of procedures applied: (a) **Qualitative Indicator Testing** — For qualitative Leadership Indicators and management approach disclosures under the nine BRSR principles, TÜVINDIA applied the following procedures: (i) existence verification — confirmed that stated policies (e.g., Code of Conduct, Whistleblower Policy, POSH Policy, ESG Policy, Human Rights Policy, Supplier Code of Conduct) are formally documented and Board/management-approved; (ii) implementation evidence — reviewed board resolutions, committee meeting minutes, training records, grievance logs, CSR project reports, and supplier onboarding checklists to verify that disclosed practices are operationally implemented; (iii) consistency check — cross-referenced qualitative disclosures in the BRSR against management interview responses and internal documents to identify material inconsistencies; and (iv) completeness review — confirmed that disclosures under each BRSR principle include both quantitative KPIs and qualitative management approaches as required. (b) **GHG Emissions** — recalculation of Scope 1 emissions from primary fuel consumption data (diesel, HFO, LNG, and other fuel types used in port equipment) using IPCC/GHG Protocol emission factors; reconciliation of Scope 1 fugitive emission records. For each reported Scope 3 category, TÜVINDIA verified the data quality hierarchy by tracing activity inputs — such as procurement records, fuel purchase invoices, logistics contracts, travel booking systems, and asset registers — against the emission factors and calculation methods applied, confirming alignment with the GHG Protocol Corporate Value Chain (Scope 3) Standard. Where primary supplier data was unavailable, TÜVINDIA assessed the appropriateness of secondary or proxy factors by cross-referencing against recognised databases including IPCC, IEA, and GHG Protocol Technical Guidance sector coefficients through document review and management interviews. Verification procedures also included consistency checks of category-level totals against prior-year figures, internal aggregation workpapers, and the organisation's GHG inventory tool, with findings retained in TÜVINDIA's engagement workpapers. This applies throughout this statement and to all sections of the assurance methodology; (b) **Energy** — cross-verification of meter readings against utility bills for port facilities; validation of renewable energy certificates and solar generation records; (c) **Water** — review of water intake records at port level, traceability to municipal supply invoices and groundwater extraction permits; (d) **Safety** — verification of LTIFR calculations against port-level incident registers, HR records, and contractor workforce records; (e) **Waste** — reconciliation of hazardous and non-hazardous waste disposal records against Pollution Control Board returns and third-party disposal manifests across port sites.

5. Sampling Methodology

- iii. **Risk-based sampling:** TÜVINDIA applied a risk-based sampling methodology considering materiality thresholds, data complexity, estimation uncertainty, geographical spread of port and logistics facilities, and site contribution to ESG impacts. Sample selection prioritised locations with significant operational impact and KPIs with higher inherent risk.
- iv. **Site Verification Coverage:** Onsite verification was conducted at 6 of 15 domestic ports/terminals (Dhamra, Gangavaram, Krishnapatnam, Vizhinjam, Hazira, and Mundra), along with the Corporate Office, Ahmedabad complemented by a complete desk review of GRI disclosure data across all remaining ports, terminals, logistics parks, and offices within the reporting boundary. TÜVINDIA applied a stratified, risk-based sampling methodology for onsite verification to support the reasonable assurance conclusion across APSEZL's reporting boundary, considering operational significance, ESG risk, operational/geographical diversity, boundary changes, emerging exposures, and centrally administered functions. Workforce and HR KPIs, including safety, training, diversity and employment, were fully covered as these are centrally managed and reported by the Corporate Office. For remaining domestic ports, terminals, logistics parks, agri silos, warehouses and international operations, TÜVINDIA performed substantive desk review procedures covering source records, reconciliations, analytical reviews, remote walkthroughs, targeted clarifications, and

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consolidation/QA-QC controls. This combined onsite and desk-review approach, supported by APSEZL's standardised ESG data framework, common KPI methodologies, centralised QA/QC review and homogeneous process controls, provided sufficient appropriate evidence to support the reasonable assurance conclusion in accordance with agreed scope of work.

- v. **KPI-specific materiality:** A 5% quantitative threshold was applied to volume-based KPIs; a qualitative zero-tolerance threshold was applied to high-risk indicators (fatalities, permanent disabilities, POSH complaints upheld, regulatory non-compliances, customer data breaches). For estimation-based disclosures (energy for leased offices using headcount-based methodologies; vehicular fuel from distance/efficiency estimates), a confidence range of $\pm 10\%$ is acknowledged and factored into the assurance conclusion.

6. Reporting Framework Adherence

Verified adherence to SEBI's BRSR guidelines, the BRSR Core – Framework for Assurance and ESG Disclosures for Value Chain (SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122), Industry Standards on Reporting of BRSR Core (SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177), and the Master Circular (HO/49/14/14(7)2025-CFD-POD2/1/3762/2026 dated 30/01/2026). TUVI evaluated BRSR disclosures against the following reporting quality principles: Stakeholder Inclusiveness, Materiality, Responsiveness, Completeness, Neutrality, Relevance, Sustainability Context, Accuracy, Reliability, Comparability, Clarity, and Timeliness.

Opportunities for Improvement

The following are the opportunities for improvement reported to APSEZL. These are generally consistent with APSEZL management's objectives and programs:

- i. The Company may consider exploring the progressive use of digital and artificial intelligence (AI)-enabled tools to further enhance ESG data collection, consolidation, validation, and trend analysis across its diverse operations.
- ii. Strengthen Scope 3 disclosure: While Scope 3 emissions are reported, APSEZL may further enhance disclosure by providing category-wise Scope 3 coverage, methodology, assumptions, exclusions, data quality and reduction actions for material categories, aligning with emerging peer practice and evolving SEBI expectations on value chain emissions reporting.

Conflict of Interest

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

In addition, TUVI maintains organizational safeguards to ensure impartiality. Independence is ensured through segregation of responsibilities, independent technical review, documented conflict-of-interest controls, and oversight mechanisms in accordance with ISO 14064-3:2019 and ISO 17029:2019. TUVI confirms that the engagement was performed under a system of quality management consistent with quality control, independence, and ethical requirements, thereby addressing the requirements of ISAE 3000 (Revised). Please refer to the paragraph "**Independence and Code of Conduct**" below.

Our Conclusion

In our opinion, based on the scope of this assurance engagement, the disclosures on BRSR Core KPIs described in the BRSR, along with the referenced information, comply with BRSR Core requirements as per Annexure I for the 9 attributes and the nine BRSR principles, including Essential and Leadership Indicators, and meet the general content and quality requirements of the BRSR. TUVI confirms its competency to conduct this assurance engagement as per SEBI guidelines. Our team possesses expertise in ESG verification, assurance methodologies, and regulatory frameworks. We ensure independence, employ robust methodologies, and maintain continuous improvement to deliver reliable assessments. Based on our procedures, we did not identify any material changes in the methodologies applied for the preparation of the selected BRSR KPIs during the reporting period. APSEZL has established a policy-led data control framework for BRSR disclosures, with documented processes and defined roles and responsibilities.

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

Reasonable Assurance Conclusion: Based on the procedures performed and evidence obtained, in our opinion, the BRSR Core Key Performance Indicators (KPIs) and the nine BRSR principles, including Essential and Leadership Indicators, presented in Adani Ports & Special Economic Zone Limited's Business Responsibility and Sustainability Report for the period 01/04/2025 to 31/03/2026 have been prepared, in all material respects, in accordance with the applicable BRSR Core criteria, including the requirements of the SEBI BRSR Core framework and Annexure I KPIs, and fairly represent the nine attributes and nine BRSR principles within the defined scope without material misstatement.

BRSR complies with the below requirements

- a) **Governance, leadership and oversight:** The messages of top management, the business model, action and strategies, risk management, protection and restoration of environment, and priorities are disclosed appropriately.
- b) **Connectivity of information:** APSEZL discloses 09 BRSR principles covering Essential and Leadership Indicators and 09 attributes as

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per Annexure I – Format of BRSR Core and their inter-relatedness and dependencies with factors that affect the organization’s ability to create value over time.

- c) **Stakeholder responsiveness:** The BRSR covers mechanisms of communication with key stakeholders to identify major concerns to derive and prioritize the short, medium and long-term strategies. The BRSR provides a fair representation of the extent to which the organization understands, takes into account and responds to the legitimate needs and interests of key stakeholders.
- d) **Materiality:** Material issues within the nine attributes and corresponding KPIs as per BRSR requirements are adequately identified and reported. In our view, the BRSR meets the requirements.
- e) **Conciseness:** The Report reproduces the requisite information and communicates clear information in as few words as possible. The disclosures are expressed briefly and to the point sentences, graphs, pictorial, tabular representation is applied. At the same time, due care is taken to maintain continuity of information flow in the BRSR.
- f) **Reliability and completeness:** APSEZL has established internal data aggregation and evaluation systems to derive the performance. All data provided to TUVI has been passed through QA/QC function. The data and information was verified by TUVI’s assurance team (on sample basis) and found to be fairly accurate. All data is reported transparently, in a neutral tone and without material error.
- g) **Consistency and comparability:** The information presented in the BRSR is on an annual basis and found to be in a reliable and complete manner. No material inconsistencies in methodology, boundary, or reporting approach were identified between FY 2025–26 and FY 2024–25 disclosures. Where boundary changes occurred, these have been appropriately disclosed by APSEZL.

Independence and Code of Conduct: TUVI follows IESBA (International Ethics Standards Board for Accountants) Code which adopts a threats and safeguards approach to independence. We recognize the importance of maintaining independence in our engagements and actively manage threats such as self-interest, self-review, advocacy, and familiarity. The assessment team was safeguarded from any type of intimidation. By adhering to these principles, we uphold the trust and confidence of our clients and stakeholders. In line with the requirements of the SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated 12/07/2023 and Industry Standards on Reporting of BRSR Core, circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177, dated 20/12/2024. TUVI confirms its independence in accordance with the IESBA Code, SEBI BRSR Core assurance expectations, and its own Policy regarding Independence and Impartiality. TUVI declares that during the reporting period: no consulting, advisory, system design, data preparation, or implementation services related to ESG or BRSR were provided to APSEZL; TUVI was not involved in the preparation of the BRSR or underlying data; and no relationships or circumstances exist that could create a conflict of interest or impair independence. TUVI solely focuses on delivering verification and assurance services and does not engage in the sale of service or the provision of any non-audit/non-assurance services, including consulting. **Independence Safeguards Declaration:** (i) Engagement fees are fixed and not contingent on assurance outcomes; (ii) a mandatory pre-engagement conflict-of-interest declaration was completed by each team member; (iii) an independent technical reviewer not involved in engagement execution reviewed all conclusions prior to issuance; (iv) formal segregation is maintained between assurance and advisory functions; and (v) a documented escalation protocol requiring management sign-off applies to any identified independence threat. The assurance team comprised qualified multidisciplinary professionals including competencies in GHG accounting, ESG reporting frameworks, social compliance, and ISAE 3000 (Revised) non-financial assurance methodology.

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

Our Assurance Team and Independence

TÜV India Pvt. Ltd. (TUVI) is an independent and neutral third-party assurance provider with qualified environmental and social specialists and confirms its independence, impartiality, and objectivity in accordance with ISAE 3000 (Revised) through internal conflict-of-interest checks, adherence to a documented code of ethics, separation of assurance and advisory functions, reviewer oversight, and quality control procedures. TUVI confirms that no non-assurance services were provided to APSEZL that could create self-review, advocacy, familiarity, self-interest, or other independence threats, including preparation of BRSR disclosures, ESG strategy development, target setting, ESG data system design, GHG inventory calculations, internal ESG audits, materiality assessments, or KPI improvement advisory services. TUVI further confirms that no engagements during the reporting year compromised its independence, and it was not involved in preparing report content or underlying data, except for this assurance statement, thereby ensuring an objective, unbiased, and transparent assurance process. **Rotation and Tenure Policy:** In line with best practice and the ISF Guidelines for independence, TUVI maintains a documented engagement partner rotation policy. The lead assurance practitioner for this engagement has not exceeded the maximum tenure threshold prescribed under TUVI’s internal quality and independence framework. The assurance team comprised qualified professionals with multidisciplinary competencies, including: (i) GHG accounting and emissions verification; (ii) ESG and sustainability reporting frameworks; (iii) social compliance and human rights due diligence; and (iv) non-financial assurance methodology in accordance with ISAE 3000 (Revised). This cross-disciplinary composition ensured that the assurance conclusions across all subject matter areas are supported by adequate technical expertise.



For and on behalf of TÜV India Private Limited
Manojkumar Borekar – Product Head (Sustainability Services)



Date: 18/05/2026
Place: Mumbai, India
Project Reference No: 8124245958

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