

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.

Given the nature of AEL's operations, the company has very limited opportunities to reuse, recycle, and dispose of products at the end of their life cycle. Nonetheless, AEL has established stringent waste management protocols across its sites. Hazardous waste is meticulously handled, segregated, stored, and transported in compliance with regulatory mandates and industry best practices. This includes the environmentally sound disposal of hazardous waste through certified recyclers who adhere to all relevant regulations.

In addition to hazardous waste, AEL manages significant amounts of non-hazardous waste, such as mining by-products, scrap metal, wood, glass, tires, electronic waste, cardboard, and paper. The company's strategic goal is to reduce waste production and prevent waste from reaching landfills by promoting reuse and recycling whenever possible. AEL is committed to achieving Zero Waste to Landfill certification for all its business units wherever feasible, striving to enhance sustainability and environmental stewardship.

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.

Owing to the nature of the Company's product/service offerings, EPR is not applicable to the Company.

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

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

Category	% 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	7,825	7,825	100%	7,825	100%	--	--	7,825	100%	--	--	
Female	618	618	100%	618	100%	618	100%	--	--	--	--	
Total	8,443	8,443	100%	8,443	100%	618	7.32%	7,825	92.68%	--	--	
Other than Permanent employees												
Male	308	308	100%	308	100%	--	--	308	100%	--	--	
Female	150	150	100%	150	100%	150	100%	--	--	--	--	
Total	458	458	100%	458	100%	150	32.75%	308	67.25	--	--	

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	2,546	2,546	100%	2,546	100%	--	--	2,546	100%	--	--	
Female	582	582	100%	582	100%	582	100%	--	--	--	--	
Total	3,128	3,128	100%	3,128	100%	582	18.61%	2,546	81.39%	--	--	
Other than Permanent workers												
Male	24,780	24,780	100%	24,780	100%	--	--	--	--	--	--	
Female	2,179	2,179	100%	2,179	100%	2,179	100%	--	--	--	--	
Total	26,959	26,959	100%	26,959	100%	2,179	8.08%	--	--	--	--	

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent):

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the company	0.18%	0.08%

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

Benefits	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted & deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	Yes	100%	100%	Yes
ESI*	100%	100%	Yes	100%	100%	Yes
Others – Pls specify	NIL	NIL	NIL	NIL	NIL	NIL

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

3. Accessibility of workplaces

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 Ac, 2016? If not, whether any steps are being taken by the entity in this regard.

In accordance with the Rights of Persons with Disabilities Act of 2016, we are committed to fostering an inclusive environment for our workforce that offers equal opportunities to all, valuing a workforce rich in diversity and fairness. Our workplace design incorporates modifications and support to facilitate job performance for our staff with disabilities.

Our corporate premises feature wheelchair-accessible ramps at all entrances and public areas. Facilities tailored for employees with disabilities include specially designed restrooms. Additionally, our elevators are equipped with Braille signage to assist individuals who are blind or have visual impairments.

The Company's infrastructure, both existing and new, adheres to a detailed plan ensuring workplace accessibility for employees with disabilities. This includes workstations, restrooms, communal spaces, and pathways within and around our buildings, all thoughtfully designed with full accessibility in mind.

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

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

We cultivate an inclusive workplace that promotes a culture of support and professionalism, underpinned by trust, empathy, and reciprocal respect. Our dedication to diversity, equality, and inclusion is mirrored in the formulation of our policies.

Weblink:<https://www.adanienterprises.com/-/media/Project/Enterprises/Investors/corporate-governance/Polices/Policy-on-Diversity-Equity-and-Inclusion.pdf>

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	95.01%	100%	100%
Female	92.59%	92.59%	100%	100%
Total	99.43%	94.83%	100%	100%

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

(If Yes, then give details of the mechanism in brief)

Permanent Workers	Yes. An online grievance redressal mechanism is available for permanent employees and workers. The system is designed to redress the grievance within a defined timeline of 14 working days. The grievances are resolved in a fair and time bound manner maintaining utmost confidentiality.
Other than Permanent Workers	Yes. Contractual workers can report their grievances either to their contractor representative or the supervisor from Adani. It is the responsibility of the contractor to take the necessary steps to address these grievances. If needed, the contractor may escalate the grievance to the site HR department and the relevant functional heads for further resolution.
Permanent Employees	Yes. 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. To ensure the prevention of sexual harassment in the workplace, we regularly conduct workshops, group meetings, online trainings and awareness programs for our employees. These initiatives are held on a regular basis and aim to sensitize our employees about the importance of preventing sexual harassment and creating a safe work environment.
Other than Permanent Employees	Yes. Suppliers, consultants, retainers, clients, or any other parties engaged on a project or periodic basis are subject to the terms and conditions specified in their contracts. In the event of grievances, they have the option to raise their concerns with the relevant HR Business Partners and the respective department heads as per the established procedures.

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

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

Category	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Total employees / workers in respective category(A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)
Total Permanent Employees	NIL	NIL	NIL	NIL	NIL	NIL
- Male	NIL	NIL	NIL	NIL	NIL	NIL
- Female	NIL	NIL	NIL	NIL	NIL	NIL
Total Permanent Workers	NIL	NIL	NIL	NIL	NIL	NIL
- Male	NIL	NIL	NIL	NIL	NIL	NIL
- Female	NIL	NIL	NIL	NIL	NIL	NIL

8. Details of training given to employees and workers:

Category	FY 2024-25 Current Financial Year						FY 2023-24 Previous Financial Year					
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation			
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)		
Employees												
Male	8,133	3,765	46.29%	5,428	66.74%	6,529	4,458	68.28%	5,742	87.95%		
Female	768	370	48.17%	527	68.62%	647	294	45.44%	535	82.69%		
Total	8,901	4,135	46.46%	5,955	66.90%	7,176	4,752	66.22%	6,277	87.47%		
Workers												
Male	27,326	27,326*	100%	6,324	23.14%	17,752	6,930	39.04%	6,235	35.12%		
Female	2,761	2,761*	100%	439	15.90%	2,004	185	9.23%	134	6.69%		
Total	30,087	30,087*	100%	6,763	22.48%	19,756	7,115	36.01%	6,369	32.24%		

*Safety related parameters are covered as part of the mandatory induction program for all the workers.

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

We have implemented a comprehensive Performance Management System (PMS) designed to provide clear and transparent guidance at every stage of the process and to define the expectations of all participants. This system encompasses a variety of activities, including year-end performance reviews, recommendations for ratings and promotions, moderation, and personalized feedback.

All eligible employees, including permanent staff, undergo an annual performance evaluation as per the Company's guidelines. For non-permanent employees, performance assessments are conducted by contractors according to the terms outlined in their respective agreements.

Category	FY 2024-25 Current Financial Year			FY 2023-24 Previous Financial Year		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	7,825	6,578	84.06%	6,529	6,208	95.08%
Female	618	569	92.07%	647	607	93.82%
Total	8,443	7,147	84.65%	7,176	6,815	94.97%
Workers						
Male	2,546	1,714	67.32%	1,566	1,491	95.21%
Female	582	200	34.36%	156	149	95.51%
Total	3,128	1,914	61.19%	1,722	1,640	95.24%

Note: The data on performance and career development reviews is for permanent employees and permanent workers. The balance employees and workers were not eligible for PMS, considering their tenure in the company not falling in the PMS cycle.

10. Health and safety management system:

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

Yes, the Company has successfully adopted and implemented the Adani Group's Safety Management System framework. This integration of essential business operations, combined with the application of key principles and processes, ensures safe and healthy work environments across all company locations. The primary goal is to prevent occupational injuries and diseases, reduce hazards, and continually improve safety performance.

The Adani Safety Management System is built on eight fundamental components: Performance orientation, Executive commitment, Teamwork orientation, Employee empowerment & enlistment, Scientific decision-making, Continual improvement, Comprehensive & ongoing training, and Unity of purpose.

The establishment and operation of seven Safety Taskforces, addressing Standards & Procedures, Contractor Safety Management, Training & Capability, Logistics Safety, Safety Interaction, Incident Investigation & Audits, and Technological Intervention, are robust and adhere to the outlined charter and a three-tier governance structure.

Most of AEI's business sites have achieved certification under ISO 45001:2018 (OHSMS), demonstrating their commitment to occupational health and safety management standards.

Furthermore, the operational businesses have integrated the Group Safety Management System with their existing Integrated Management Systems (IMS), such as ISO 14001 (EMS) and ISO 45001 (OHSMS), enhancing the overall safety framework. All our sites are assessed on Health & Safety practices.

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

The Adani Group has implemented a comprehensive array of globally recognized Safety Intervention and Risk Assessment initiatives. These include Safety Interaction (SI), Vulnerability Safety Risks (VSR), Site Risk Field Audits (SRFA), Process Hazard Analysis (PHA), and Pre-Startup Safety Review (PSSR). These initiatives are integrated into the Business-specific Integrated Management System, which is based on the Hazard Identification and Risk Assessment Process, such as HIRA and JSA. This structure has been adopted by the company, and its reporting entities have developed a participative and consultative approach to engage all relevant stakeholders, including employees, associates, and contract workers.

The Safety Assurance & Due Diligence program for internal Group Safety procedures is systematically carried out by the Group Safety Team at Adani locations, based on project criticality and risk levels.

Furthermore, the Group Technological Intervention Taskforce has been pivotal in initiating and implementing technology-driven solutions to reduce operational risks and enhance efficiency.

The Company acknowledges the necessity of managing and mitigating dynamic risks according to the Hierarchy of Control to protect stakeholders and achieve the goal of Zero Harm, while also promoting sustainable development.

These measures encompass a thorough understanding of the potential positive and negative impacts of various occupational and personal factors on the organization. The primary objective is to prevent injuries, protect assets, and create sustainable value across all organizational activities and processes.

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

Yes, the Company effectively utilizes the Adani Group's robust Incident Management and Investigation System to ensure fair and transparent documentation of occupational hazards and risks. This includes unsafe practices, hazardous conditions, close calls, injuries, diseases, and significant events. A comprehensive Root Cause Failure Analysis follows, leading to the development and implementation of corrective measures in line with the Hierarchy of Controls. These measures are then diligently tracked, monitored, and ultimately resolved.

Insights and lessons learned from these occurrences are shared throughout the Group via a structured mechanism known as the 'Critical Vulnerable Factor' (CVF), which is integral to the Group's Safety Governance Process. The progress of CVF initiatives is regularly reviewed at the Adani Apex Group Safety Steering Council and Business Safety Council Meetings.

Supporting these processes, the Adani Group has introduced a digital platform for Occupational Health and Safety (OH&S) reporting. This platform is accessible to all company employees and workers through both its website and a dedicated mobile application.

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

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

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

Safety Incident/Number	Category	Current FY (2024-25)	Previous FY (2023-24)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.14	0.04
	Workers	0.13	0.03
Total recordable work-related injuries	Employees	3	3
	Workers	16	13
No. of fatalities	Employees	0	0
	Workers	4	4
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 well-being and safety of our personnel are of utmost importance to us. To achieve this, we have adopted a collaborative approach that underscores the shared responsibility. We engage with individuals across all levels to strengthen a culture of safety across our company's operations. Our goal is to decrease reportable incidents, reduce injuries, and maintain consistent oversight of our sites' safety performance.

At Adani Group, a core tenet of 'Growth with Goodness' is the protection of our people within the 'Zero Harm culture'. We are dedicated to fostering a 'Culture of Care', ensuring every task is conducted safely, which supports the ongoing growth and sustainability of our enterprises for a 'Generative Safety Culture' through both 'Top Down' and 'Bottom Up' approaches.

Our initiatives are focused on Three Safety Enablers: 'Organization & Culture', 'Systems & Processes', and 'Equipment & Facilities', which guide us toward the 'Safety Integral Stage' of the Integral Culture Model.

Adani Group has implemented extensive Safety Management Systems in line with international standards and best practices. These systems include policies, procedures, and guidelines designed to identify, evaluate, and mitigate workplace hazards and risks. They offer a systematic approach to enhance safety awareness and ensure adherence to safety regulations. All AEL businesses are in compliance with the Group's Safety Management Systems.

Our organization conducts consistent training and awareness initiatives to provide our employees and contractors with the essential knowledge and skills required to recognize and mitigate workplace hazards. These initiatives encompass a range of topics, including safe work practices, emergency response procedures, correct equipment and machinery handling, and the utilization of personal protective equipment (PPE). This year, our Data Center business has launched several digital projects, such as Virtual Reality-based training for high-risk activities to increase worker awareness, and AI-based monitoring systems. Meanwhile, our Solar Manufacturing business under New Energy Ecosystem has established a strong framework to enhance the safety system through seven distinct task forces, adhering to the Group Safety standards. In our Airports business, regular safety audits and inspections are conducted to detect any hazards or unsafe conditions present in the workplace, followed by the implementation of appropriate measures to eradicate these hazards. Additionally, we maintain a rigorous work permit system and conduct various programs like Toolbox talks, task briefings, job-specific training, job safety analysis, and mock drills, all contributing to the cultivation of a safety culture across our enterprises.

We promote active engagement and participation from our employees in safety-related activities. Employees are motivated to offer feedback, voice safety concerns, and play a role in the creation and execution of safety measures. This collective approach nurtures a culture of safety where each individual feels accountable for not only their own safety but also the well-being of their colleagues.

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

Category	Current FY (2024-25)			Previous FY (2023-24)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	NIL	NIL	NA	NIL	NIL	NA
Health & Safety	NIL	NIL	NA	NIL	NIL	NA

14. Assessments for the year:

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

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

Each incident undergoes a comprehensive investigation following the Group Safety Guidelines on Incident Reporting & Investigation. The insights gained from these inquiries are disseminated across various locations to prevent the recurrence of similar incidents. We also proactively encourage our employees and workers to report any observed unsafe acts and conditions, striving to completely eliminate such incidents.

Within AEL's Natural Resources division, 'Ground Zero Safety Personnel (GZSPs)' have been introduced to identify hazards and assess risks. If feasible, they take immediate action to rectify the situation or report it to the relevant individuals for appropriate measures. The findings from these inspections are then reviewed at both the site and Business Unit (BU) levels.

In AEL's Solar Manufacturing sector under the New Energy Ecosystem, comprehensive machine guarding has been implemented for all equipment, along with ongoing vehicle inspections, delineation of pedestrian pathways throughout the facility, and the evaluation and approval of Material Handling Equipment (MHE). At our Mumbai Airport location, a weather monitoring station has been established and operationalized airside to manage operations effectively during adverse weather conditions.

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).

Employees: Yes, Workers: Yes

To offer protection and assistance to our employees during times of uncertainty and hardship, we have implemented a 'Group Term Life Insurance' policy. This policy is crafted to ensure security and support for employees in adverse situations. Additionally, we have an 'Employee Death Relief Policy' to provide comprehensive support to the families of our deceased employees, whether due to natural or accidental causes, while they are employed by the Company. Furthermore, in compliance with legal requirements, all employees and workers are covered under an Accident Insurance policy.

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

We conduct regular reviews and inspections to ensure compliance with statutory obligations related to workers in our value chain, including the timely payment of wages and social security benefits. In the event of any non-compliance, strict actions are taken against business partners who fail to meet these obligations.

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

	Total number 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	
		Current FY (2024-25)	Previous FY (2023-24)
Employees	0	0	0
Workers	0	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, upon reaching retirement age and in alignment with business needs, selected employees may be engaged as advisors or consultants. Furthermore, employees benefit from a variety of skill development programs throughout their tenure, designed to enhance their ongoing 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 & Safety Practices	100%*
Working Conditions	100%*

*Significant Suppliers

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

For all critical contractors and suppliers, we conduct both pre-qualification and post-qualification reviews, which encompass evaluations of their OHS management system, policies and procedures, organizational structure, and commitment. Additionally, we regularly perform Safety Risk Field Audits (SRFA) to identify working conditions that require improvement. Furthermore, we engage in 'Suraksha Samwaad', a dialogue aimed at identifying potential enhancements in Health and Safety practices.

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

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

AEL believes that stakeholder engagement is essential for understanding their needs, collaborating to reduce risks, maintaining social legitimacy, enhancing credibility, and building trust.

Stakeholders are defined as groups and individuals who can influence or be influenced by our operations, activities, technological changes, regulatory shifts, market dynamics, and societal trends, either directly or indirectly. This includes communities, employees, supply chain partners, clients, investors, regulatory bodies, and civil society organizations across all our operations. We are committed to engaging with our stakeholders openly and sincerely, aiming to strengthen cooperation and mutual support, thereby fostering sustainable relationships.