

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

AESL has shown a strong commitment to engaging with vulnerable and marginalized groups through various initiatives. These include community outreach programs where regular town hall meetings and forums are held to allow community members to voice their concerns. We ensure to defend their rights, interests, natural and cultural resources as well as give them resources to participate and benefit from development.

**Educational initiatives** such as scholarships for underprivileged students and vocational training programs also play a significant role in empowering these groups.

In **healthcare**, AESL has made notable efforts in improving access to essential healthcare infrastructure and services by funding mobile clinics that offer free medical check-ups and essential health services in remote areas.

**Economic empowerment** is another focus area, with micro-financing projects, support for small businesses, and training programs designed to improve employment prospects for marginalized communities.

AESL is also active in **advocacy**, working with government bodies and NGOs to promote policies that protect the rights of vulnerable groups. Environmental sustainability projects, such as clean energy initiatives and waste management programs, further demonstrate AESL's commitment to creating a more equitable and inclusive society for everyone.

## PRINCIPLE 5

### BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

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

Category	FY 2024-25 (Current FY)			FY 2023-24 (Previous FY)		
	Total (A) number of Employees / Workers	No. of employees / workers covered (B)	% (B / A)	Total (A) number of Employees / Workers	No. of employees / workers covered (B)	% (B / A)
<b>Employees</b>						
Permanent	1,881	1,121	60%	2,268	981	43%
Other than permanent	0	0	0	0	0	0
<b>Total Employees</b>	<b>1,881</b>	<b>1,121</b>	<b>60%</b>	<b>2,268</b>	<b>981</b>	<b>43%</b>
<b>Workers</b>						
Permanent	2,310	0	0%	2,667	108	04%
Other than permanent	5,392	0	0%	6,189	150	02%
<b>Total Workers</b>	<b>7,702</b>	<b>0</b>	<b>0%</b>	<b>8,856</b>	<b>258</b>	<b>03%</b>

Note: above numbers for Refresher training on human rights.

All new joiners are provided Human rights training during induction program.

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

Category	FY 2024-25 Current FY					FY 2023-24 Previous FY				
	Total	Paid Equal to Minimum Wage		Minimum Wage		Total	No. of Employees covered on Health and safety measures		No. of Employees covered on Skill upgradation	
		No. (A)	No. (B)	% (B/A)	No. (C)		No. (D)	No. (E)	% (E/D)	No. (F)
<b>Permanent Employees</b>	<b>1,881</b>	<b>0</b>	<b>0%</b>	<b>1,881</b>	<b>100%</b>	<b>2,292</b>	<b>0</b>	<b>0%</b>	<b>2,292</b>	<b>100%</b>
Male	1,639	0	0%	1,639	100%	2,020	0	0%	2,020	100%
Female	242	0	0%	242	100%	272	0	0%	272	100%
<b>Other than Permanent Employees</b>	<b>0</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
Male	0	0	0%	0	0%	0	0	0%	0	0%
Female	0	0	0%	0	0%	0	0	0%	0	0%
<b>Permanent Workers</b>	<b>2,310</b>	<b>0</b>	<b>0%</b>	<b>2,310</b>	<b>100%</b>	<b>2,667</b>	<b>0</b>	<b>0%</b>	<b>2,667</b>	<b>100%</b>
Male	2,190	0	0%	2,190	100%	2,530	0	0%	2,530	100%
Female	120	0	0%	120	100%	137	0	0%	137	100%
<b>Other than Permanent Workers</b>	<b>5,392</b>	<b>0</b>	<b>0%</b>	<b>5,392</b>	<b>100%</b>	<b>6,189</b>	<b>0</b>	<b>0%</b>	<b>6,189</b>	<b>100%</b>
Male	5,255	0	0%	5,255	100%	6,027	0	0%	6,027	100%
Female	137	0	0%	137	100%	162	0	0%	162	100%

**3. Details of remuneration/salary/wages, in the following format:**

**a. Median remuneration / Wages:**

	FY 2024-25			
	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors	5 <sup>\$</sup>	21,65,000*	02	24,15,000*
Key Managerial Personnel	4	5,74,70,382	0 <sup>#</sup>	Not applicable <sup>#</sup>
Employees other than BoD and KMPs	1,676	21,68,356	247	10,20,859
Workers	7,570	2,65,824	259	2,65,824

Note:

\* Represents the sitting fees drawn by the Directors during FY 2024-25.

# No women in KMP position.

<sup>^</sup> On Consolidated basis.

<sup>\$</sup> Includes 1 Independent director who retired w.e.f. August 31, 2024, on completion of tenure.

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

	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Gross wages paid to females as % of total wages	8.64%	7.9 %

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

Yes, the Adani Grievance Management System is in place which is responsible for addressing human rights impacts or issues.

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

At AESL, all employees can report human rights abuse through an online grievance redressal mechanism, known as the Adani Grievance Management System. The system is accessible to permanent employees and workers. Initially, employees and workers can report their grievances to BU HR teams. In case the resolution is not satisfactory, a grievance can be raised through an online ticket on the system. The system is designed to resolve a grievance within a defined timeline of 14 days, from the day a grievance is raised. Furthermore, the Grievance Redressal Committee ensures to protect and safeguards the confidentiality of the aggrieved.

Additionally, training sessions and awareness programs were conducted to educate employees and stakeholders about human rights, the importance of reporting grievances, and the mechanisms in place to address them. Physical complaint boxes were provided. To encourage reporting, mechanisms guarantee anonymity and confidentiality by allowing anonymous submissions and ensuring that all complaints are handled with the utmost privacy.

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

	FY 2024-25 (Current FY)			FY 2023-24 (Previous FY)		
	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		01	0	Refer note
Discrimination at workplace	0	0		0	0	
Child Labour	0	0		0	0	
Forced Labour / Involuntary Labour	0	0		0	0	
Wages	0	0		0	0	
Other human rights related issues	0	0		0	0	

**Note:** Necessary action related to training of employees undertaken.

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

	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	1
Complaints on POSH as a % of female employees / workers	0%	4%
Complaints on POSH upheld	0	0

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

AESL's Vigil mechanism (Whistle Blower Policy) and POSH policy have provisions for addressing complaints pertaining to discrimination, unethical behavior, actual or suspected fraud or violation of the code of conduct. All complaints are taken up by the Internal Complaint Committees (ICCs), which are governed under strict confidentiality. There are defined procedures to protect the complainant from any retaliatory actions. The policies have ample provisions that provide adequate safeguards against victimization of employees and Directors and provide direct access to the Chairperson of the Audit Committee in exceptional cases. An employee can also raise any other grievances through the online grievance portal. 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. All the pertinent information is maintained by the POSH Committee or Grievance Committee in a secure manner. Moreover, the identity of the aggrieved is protected until the final investigation is completed.

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

Yes, Human rights related requirements are covered as a part of the vendor onboarding process through ARIBA portal (IT enabled sourcing portal) and included under General terms and conditions of all purchase/service orders.

## 10. Assessments for the year:

We have defined systems for ensuring compliance with regulatory requirements. There is a Code of Conduct for employees and the Suppliers' Code of Conduct to ensure conformity with business ethics and human rights requirements. Also, the human rights criteria are screened through online ARIBA portal during vendor onboarding process. In addition, we review compliance with these requirements during contract execution. In all our business units, it is mandatory to check the age proof documents at the time of recruitment to prevent employment of child labour and during the induction session essential business ethics and human rights related aspects are covered for creating awareness among employees.

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100%
Forced/involuntary labour	100%
Sexual harassment	100%
Discrimination at workplace	100%
Wages	100%
<b>Others - please specify</b>	Not Applicable.

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

Not applicable. Refer "Core Principle of Our Human Rights Framework" in Employees section on page 215 for details

### Leadership Indicators

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

We have proactively assessed potential human rights issues across our operations in the last 5 years. We also conduct internal audits/assessments in addition to ISO audits to identify the observation if any. We are 100% compliant with Human rights related concerns.

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

At AESL, we have developed a code of conduct, and every employee needs to adhere to it. Under employees' code of conduct, there are many human rights issues noted such as anti-bribery, anti-corruption, etc. As a part of the Social Accountability Standard certification pursued by AESL, annual internal audits and continuous workplace monitoring activities ensure a strict adherence to policies, identify violations, and take necessary action. In accordance with the periodic Social Accountability Risk Assessment to identify and prioritize the area of actual or potential non-conformance to the standard needs to be conducted. The comprehensive list of human rights risks assessed are as follows:

- Engagement of child labour
- Engagement of child labour by suppliers and sub-contractors
- Engagement of forced labour
- Non-compliance of EHS guidelines
- Corporal punishment, mental or physical coercion or verbal abuse of personnel
- Exceeding working hours / Working without a weekly day of rest.
- Lower payment of wages
- Discrimination in the workplace

We recognize human rights as one of the key risk factors and pay significant emphasis on addressing its impact. Human rights also form part of our organization's risk matrix. This inclusion is reviewed periodically to ensure its effectiveness. Furthermore, periodic Social Accountability Risk Assessments are also carried out to systematically assess and address potential social responsibility risks. We also conduct training sessions for our on-roll and off-roll employees across divisions and zonal offices. This enables us to create awareness among our workforce about human rights and their associated impacts.

## 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?

All our offices comply with the Rights of Persons with Disabilities Act, 2016, ensuring equal opportunities and a diverse work environment. We have provisions for differently abled individuals (employees, workers and visitors) including assistance and workplace modifications which enable individuals (employees, workers & or visitors) with disabilities to carry out their jobs easily. Our corporate offices are equipped with wheelchairs, ramps, dedicated toilets, and Braille signs in elevators for accessibility. All our locations meet national and local requirements for accommodating individuals with disabilities. Our infrastructure incorporates comprehensive plans to ensure accessibility in work areas, restrooms, common areas, and movement around facilities.

## 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	0%*
Discrimination at workplace	100% w.r.t. pay and entitlement
Child Labour	100%
Forced Labour/ Involuntary Labour	100%
Wages	100%
Others - Please specify	Not applicable

**Note:** \* We encourage Supply chain partners to adhere to POSH requirements but have limited monitoring for the same.

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

We have revised our [Supplier Code of Conduct, Human Rights Policy](#) in the reporting period.