

ENVIRONMENTAL, SOCIAL AND GOVERNANCE

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Greenmosphere Biodiversity Park, Ahmedabad - CSR initiative

ESG approach

Driving resilient growth and responsible practices

At Adani Total Gas Limited (ATGL), our sustainability and ESG framework goes beyond compliance to drive innovation and sustainable development in all aspects of our operations. Our commitment to having a transformative influence on environment, employees, communities, partners and other key stakeholders is central to our ESG framework. This commitment is driven through ambitious goals and initiatives, with a focus on decarbonisation, occupational health and safety, resource conservation, local procurement, and stakeholder engagement to generate sustainable value.



Mission

To be ranked as a top performer in the ESG ratings across Energy utility sector in India.

To be a leader in ESG performance within the Gas utility sector by actively engaging with stakeholders and adopting responsibly.

Aligning with UNSDGs

Business, Climate and Environment

Contribution to UNSDGs

Decarbonisation

- Deploying energy-efficient technologies, IGBC certification, renewable energy sources, Methane Leak Detection and Repair surveys (LDAR) and fleet decarbonisation to achieve ATGL's Operational Net Zero 2045 goal
- Expanding clean energy solutions such as Compressed Bio Gas (CBG), EV charging, LNG infrastructure and GH₂ blending in our PNG network to support India's clean energy transition



Circular Economy

- Our CBG plants utilise Agri waste, livestock and municipal solid waste converting it into sustainable energy
- Water recycling through rainwater harvesting structures across ATGL sites
- ZWL approach with 99.99% waste diversion from landfill through reuse and recycling



Biodiversity

- Advancing towards Net Positive impact on Biodiversity as per IBBI principles
- Development of a low-carbon society through greenmosphere initiative
- Paperless billing to save trees



Social

Contribution to UNSDGs

- Foster a diverse and inclusive workplace focussing on employees' learning and development, safety and well-being
- Robust framework of policies and procedures to strengthen human rights and labour practices
- Enhancing customer delight through uninterrupted gas supply, and digital interventions
- Inclusive community empowerment programmes supporting education, skills and sustainable livelihood, health, resilience against climate change, rural infrastructure development



Robust Governance

Contribution to UNSDGs

- Strong corporate and ESG governance framework to balance sustainability, and ethics with profits and compliance
- Robust enterprise risk management framework for resilient growth and value creation
- Comprehensive Data Privacy and Security systems and procedures

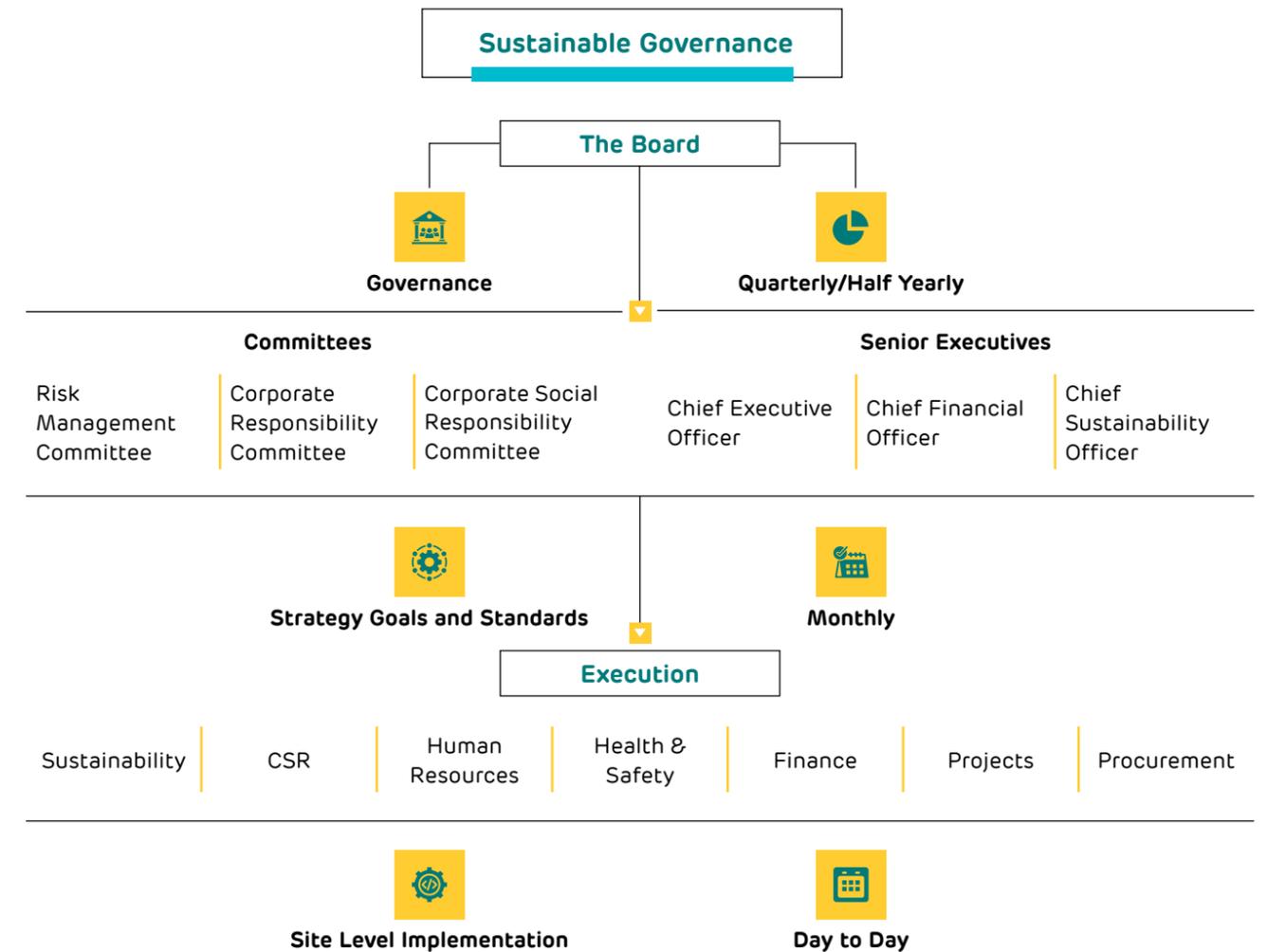


ESG Framework

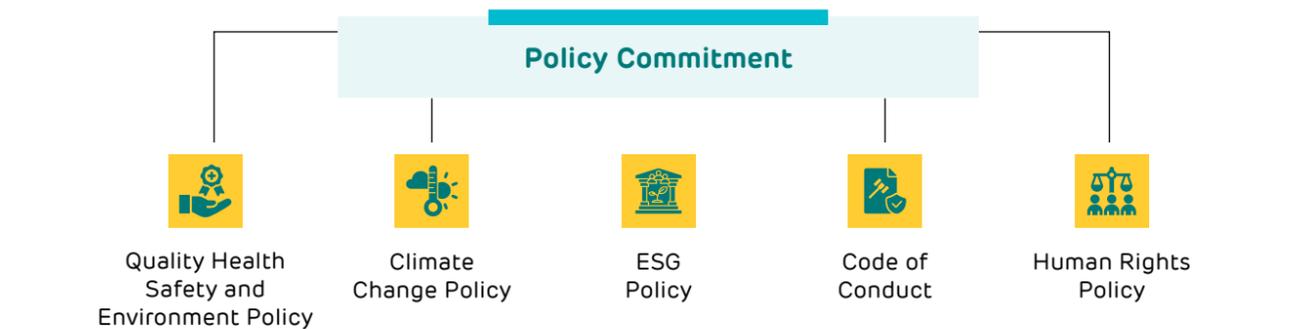
Guiding Principles and Disclosure Standards



Climate and ESG Governance Structure



At ATGL, the Board leads sustainability governance by setting strategic direction and providing oversight to the climate and ESG agenda. The Board is assisted by its 100% independent Corporate Responsibility Committee (CRC) in overseeing the implementation of sustainability commitments across the organisation. The senior management team is responsible to shape and operationalise this agenda, integrating it into ATGL's daily operations through actionable strategies.



[Read about our policies on our website from here](#)

Best-in-Class Management Systems and Assurance

Integrated Management Systems	Information Security and Business Continuity	Robust Sustainability Governance and Impact Management
<ul style="list-style-type: none"> ISO 14001:2015 (Environmental Management System) ISO 9001:2015 (Quality Management System) ISO 45001:2018 (Occupational Health & Safety Management System) 	<ul style="list-style-type: none"> ISO 27001* Multi-factor authentication for end-point system access Data Leak prevention monitoring and control Regular patch update to servers and end user systems to keep the infrastructure up to date against vulnerabilities Regular quarterly vulnerability assessment and mitigation for servers <p>*Implementation is in progress</p>	<ul style="list-style-type: none"> Board-led ESG governance with support from management team to drive implementation Structured process for stakeholder engagement and material issues identification Regular audits, inspections and independent assurance to enhance compliance Training and capacity building of employees and business partners to drive impact

Roles and Responsibilities

Board Level

Board

- Convenes annually, to review and approve ATGL's sustainability strategy and action plans for the upcoming financial year
- Finalises ESG targets, climate action plans and environmental initiatives
- Approves budget for climate initiatives and sustainable investments

Corporate Responsibility Committee (CRC)

- Review decarbonisation progress against the climate action plan, sanction annual budgets and update on progress related to capex initiative to address climate change risks and opportunities
- Regularly monitor ESG progress against defined Key Performance Indicators (KPIs) and targets
- Review the ESG Performance on a quarterly basis
- Review and approve environmental, social and governance disclosures as a part of annual integrated reports (IR) and Business Responsibility and Sustainability Report (BRSR)
- Periodically evaluate ESG policies, setting clear guidelines, objectives and processes for sustainable development

Risk Management Committee (RMC)

- Assists the Board in identifying, evaluating, and managing potential risks, including the climate-related physical and transition risks to enhance organisation's resilience.

Management/Executive Leadership Level

Chief Executive Officer (CEO)

- Oversees Company's operations, obtains internal approvals for key strategic initiatives, including climate action
- Presents proposals for Board approval
- Oversees execution of climate-change agenda in alignment with the Board's vision, budget and strategic plan

Chief Sustainability Officer (CSO)

- Leads cross-functional coordination for development and implementation of sustainability strategies
- Tracks and evaluates sustainability progress across business functions
- Prepares for quarterly sustainability business review with the CRC committee

Chief Financial Officer (CFO)

- Leads economic evaluation of investment plans and actions, including climate change & mitigation strategy

Chief Risk Officer (CRO)

- Leads and reviews climate-related risks and opportunities assessment, presented quarterly to the Risk Management Committee of the Board

Key Component of our Climate Action Plan

Low Carbon Diversification: Invest in clean energy ventures such as Compressed Biogas, E-Mobility, LNG, Green Hydrogen (GH₂)

Strategic Investments: Implement prudent capex plans for infrastructure digitalisation and energy efficiency measures

Policy Advocacy: Collaborate with regulators and policymakers to shape inclusive sustainability policies

Climate Informed Decisions: Plan investments and project financial impacts, integrating climate risk-opportunity analysis

Goals and Targets: Set clear climate action targets, such as energy and emission reductions, with rigorous performance tracking

Value Chain Assessments: Undertake assessment of value chain for Scope 3 emission target setting in upcoming year

Greenosphere Initiative: Create low carbon society by promoting mass plantation, engaging young students (green millennials), energy conservation champions

Carbon Footprint Incentive (CFI): Boost gas consumption volumes through CFI

Infrastructure Expansion: Scale up natural gas network to accelerate energy transition

Employee Engagement: Offer climate-change incentives to drive participation from the management team & employees

ESG Performance

ENVIRONMENTAL

Key Performance Indicators (KPIs)	Baseline/Base Year	Performance in FY 2024-25	Target for FY 2025-26
Decarbonisation of fleet through CNG adoption	50% (FY 2021-22)	100%	100%
Enhancement of Renewable energy (Captive Solar Installation Capacity)	550 KW (FY 2021-22)	45.16 kW capacity installed (943.16 kW total capacity)	Achieve 2 MW total capacity
Advanced Leak Detection Survey of gas grid	1,000+ Km (FY 2022-23)	7,200 km	3,500 km of gas grid to be surveyed
Zero Waste to Landfill (ZWL) certification	Zero ZWL sites (FY 2023-24)	04 GA sites certified for ZWL	Renewal of certificate and achieve ZWL certification for another 05 sites
Number of sites with rainwater harvesting infrastructure	18 Sites (FY 2023-24)	12 sites	10 sites
Mass Plantation	2.2 lakh trees (FY 2022-23)	1,875 Trees planted during the year (Cumulative 2.7 lakh trees planted till March 31, 2025)	50,000 tree plantations
CDP Climate Change Ratings	'C' (FY 2022-23)	'B'	Improve rating to 'A -'
DJSI-ESG Rating (S&P global)	'50' (FY 2022-23)	'62'	Improve score to '70'

SOCIAL

Key Performance Indicators (KPIs)	Baseline/Base Year	Performance in FY 2024-25	Target for FY 2025-26
Percentage of employees trained on ESG	31% (FY 2022-23)	70%	100% employees
Percentage of employees provided performance and career development reviews	100% (FY 2022-23)	100%	Sustain 100%
Assessment of plants & offices for HSE & working conditions	100% (FY 2022-23)	100%	Sustain 100%
Employee workplace fatality	Zero (FY 2021-22)	Zero	Zero
Lost Time Injury Frequency (LTIFR)	Zero (FY 2022-23)	0.57	<0.75
Number of students engaged through Greenmosphere initiative	4,250 (FY 2022-23)	Over 18,500 students covered	30,000 students to be covered

GOVERNANCE

Key Performance Indicators (KPIs)	Baseline/Base Year	Performance in FY 2024-25	Target for FY 2025-26
Percentage of employees trained on human rights	25% (FY 2022-23)	100%	100%
Percentage of employees trained on Anti-Bribery and Anti-Corruption	Zero (FY 2022-23)	100%	100%
Percentage of Board of Directors upskilled on ESG	Zero (FY 2022-23)	100%	100%
Incidents of discrimination and harassment, including sexual harassment	Zero (FY 2022-23)	Zero	Zero
Incidents of corruption, bribery or anti-competitive behaviour	Zero (FY 2022-23)	Zero	Zero
Incidents of breach of data privacy and cybersecurity	Zero (FY 2022-23)	Zero	Zero

ESG Ratings

<p>B Climate Change CDP</p>	<p>62 DJSI-S&P Global CSA S&P Dow Jones Sustainability Indexes</p>	<p>58 (Adequate) Crisil a company of S&P Global</p>	<p>24.5 (Medium Risk) Sustainalytics SUSTAINALYTICS</p>
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Awards and Recognitions

- Received CII-CAP 2.0 Climate Change Award (Oriented category) as recognition for its sustainable solutions
- Humanity HERO Award 2024-25 conferred by CSR associate partner – Yuva Unstoppable



CSO Message

Being in the natural gas distribution business, sustainability is intricately woven into ATGL's organisational tapestry. Our approach prioritises climate action plan, environmental stewardship, safety of our people and plants, social accountability, strong governance, and economic vitality. By reducing carbon footprint, enhancing energy efficiency, and accelerating renewable energy solutions, we are forging a greener and more equitable future for all.

Pranab Kumar Ghosh
Chief Sustainability Officer



CII - CAP 2.0, Award Ceremony, New Delhi

Environmental

Advancing sustainability and striving towards a greener future

We are making significant strides towards achieving our climate and environment goals. We continuously monitor and evaluate our environmental footprint and implement innovative solutions to establish sustainable and low-carbon operations. Our environmental management systems are accredited to ISO 14001:2015 standards and we set annual goals and objectives aimed at mitigating climate change and protecting invaluable ecosystems.

Key Linkages

SDGs



Associated Risks

R1 R3

Material Topics

M1 M2 M3 M4
M5 M6 M7 M8

Strategic Priorities

S1 S4 S5

Capitals



Focus Areas and Key Highlights

Climate Change and Decarbonisation – Energy and Emissions

943.16 kW
Installed in-house solar energy capacity

7,200 km
LDAR survey & Lock Pressure Test (LPT)

Water Stewardship

35,303 KL
Units water savings due to water conservation initiatives i.e Rainwater Harvesting

Waste Management

05
Single-Use-Plastic (SUP) free sites



Environmental Management System

In the Oil & Gas Sector, we are a pioneer in having an Environmental Management System (EMS) which addresses each of the regulatory requirements in a systematic and cost-effective manner. It also helps us address non-regulated issues, such as energy conservation, promote stronger operational control, monitoring mechanism and employee stewardship. Our EMS extends beyond mere legal compliance and help reduce the risk of non-compliance and improve health and safety practices for employees and the public.

Our [Climate Change Policy](#), [Quality, Health, Safety & Environment \(QHSE\) Policy](#), and other environmental policies guide our efforts to ensure compliance with environmental laws and regulations. We provide trainings across the organisation on various ESG issues to drive synergies towards enhancing our environmental performance and ESG goals.

The Board-level Corporate Responsibility Committee (CRC) comprising 100% Independent Directors oversee the implementation of ESG policies, goals and strategies across the Company's operations. CRC communicates and provides assurance to the

Board regarding the ESG issues and progress. At the management level, the CEO and the CSO are responsible to provide oversight to the day-to-day implementation of the ESG policies and initiatives and provide quarterly updates to the Board.

In FY 2024-25, there were zero instances of environmental non-compliance, including the fines/penalties.

 [Read about our climate change and environmental policies](#)

 **Our Integrated Management Systems in Ahmedabad, Faridabad, Vadodara and Khurja GAs are certified for ISO 9001:2015, 14001:2015, and ISO 45001:2018. We aim to extend these certifications to all our GAs by 2027.**

Commitment Towards Climate Action

Climate Risk Assessment

We have conducted a comprehensive climate risk assessment in FY 2024-25 covering 04 sites. The assessment helped us understand the vulnerabilities of our assets and operations due to climate change over the short, medium and long term. The assessment was carried in alignment IFRS S2 Climate-related disclosure issued by the International Sustainability Standard Board (ISSB). The Board-level Corporate Responsible Committee (CRC) and Risk Management Committee (RMC) ensure the alignment with global best practices and regulatory frameworks. The climate-related risk management is integrated into our Enterprise Risk Management (ERM) framework. It is carried out in supervision of the Chief Sustainability Officer, who in turn, provides the inputs to the Risk Management Committee of the Board. The Chief Risk Officer is responsible for managing and addressing the identified risks.

Our total annual financial impact and cost of response to risk/opportunity for physical risks by temperature variation (Chronic category) is estimated to be in the range of ₹ 0.974 crore to ₹ 1.177 crore and ₹ 0.541 crore respectively.

Our total annual financial impact and cost of response to risk/opportunity for transitional risk by policy and legal risk is estimated to be in the range of ₹ 1.85 crore to ₹ 5.56 crore and ₹ 14.5 to ₹ 43.7 crore respectively.

The cost of capitalising the climate-related opportunities for ability to diversify the business activities (CBG) & Energy Sources is to be estimated at ₹ 526.98 crore & ₹ 7.58 crore respectively.

 [Our Climate Risk Assessment Report can be accessed here](#)



Greenmosphere Oxygen Park, Gota, Ahmedabad

Accelerating Decarbonisation Pathways Towards Net Zero

While India aspires to become a USD 30 trillion economy by 2050, a recent report* published by the Reserve Bank of India (RBI) starkly warns that climate change could slash nearly 10% off the country's GDP by then if global emission trends remain unchanged. ATGL is committed to establishing a comprehensive decarbonisation strategy to minimise its carbon footprint and contribute positively towards energy security, and economic growth, while prioritising the environment.

The Indian Scenario

India's rapid economic growth and its dependency on fossil fuels for development have resulted in it becoming the world's third-largest emitter of greenhouse gases. This is despite its per capita emissions being lower than those of developed nations.

In response to India's growing gas and energy demand, our business sector is pivotal in promoting sustainable practices. By investing in renewable energy sources and adopting energy-efficient technologies, we aim to reduce greenhouse gas emissions and energy intensity. Our strategic initiatives align with India's commitment to achieving Net Zero by 2070, ensuring a steady transition to cleaner energy. Through continuous monitoring and setting annual environmental performance targets, we are dedicated to driving accountability and impact, ultimately fostering a sustainable future while meeting the nation's energy needs.

India's Climate Change Commitments

As part of its Nationally Determined Contribution (NDC) under the Paris Agreement, India has set a target of becoming Net Zero by 2070. Additionally, India intends to achieve 500 GW of non-fossil energy capacity, and source 50% of its energy requirements from renewable energy by 2030. It also aims to reduce the emission intensity of its economy by 45% and create an additional carbon sink of 2.5 - 3.0 billion tonnes of CO₂ equivalent through additional forest and tree cover.

Presently in India, the share of natural gas in energy basket is 6.7% and the Government has set a target to raise the share of natural gas in energy mix to 15% in 2030. Furthermore, India is developing a domestic carbon market to encourage industries to adopt low-carbon technologies and trade carbon credits, fostering emission reductions across key sectors.

Strategic Approach to Decarbonisation

ATGL's decarbonisation approach closely aligns with India's commitment to achieving Net Zero by 2070. Our decarbonisation and Net Zero targets are designed to contribute to India's Nationally Determined Contribution (NDC) targets and the Conference of Parties (COP) agreements, in sync with the ESG goals laid down by our promoter partners – Adani Group and TotalEnergies. We establish annual environmental performance targets and measure our progress through continuous monitoring and engage with the leadership team to drive accountability and impact. We are focussing on reducing our energy intensity and Greenhouse Gas emissions by implementing energy-efficient technologies and renewable energy sources.

Pathway to Attain Operational Net Zero by 2045

(For Scope 1 and 2 only)

In our ambitious quest to combat climate change and achieve Net Zero Emissions for Scope 1 and Scope 2 emissions by 2045, we are focussing on reducing our energy intensity and emission intensity.

Our pathway to operational Net Zero involves a strategic approach to reducing our operational footprint. This includes adopting decarbonisation levers such as installation of rooftop solar systems at CNG/CGS stations, sourcing green electricity via open access and deploying energy-efficient technologies. Improving energy efficiency, advancing our E-mobility and Compressed Biogas (CBG) businesses, we aim to offer sustainable mobility solutions and low-carbon energy alternatives to broader communities.

We are steadfast in our journey towards sustainability, utilising innovative technologies and strategic planning to diminish our environmental impact. Through these concerted efforts, we are not only moving closer to our Net Zero objectives but also championing a greener and more sustainable future for all.

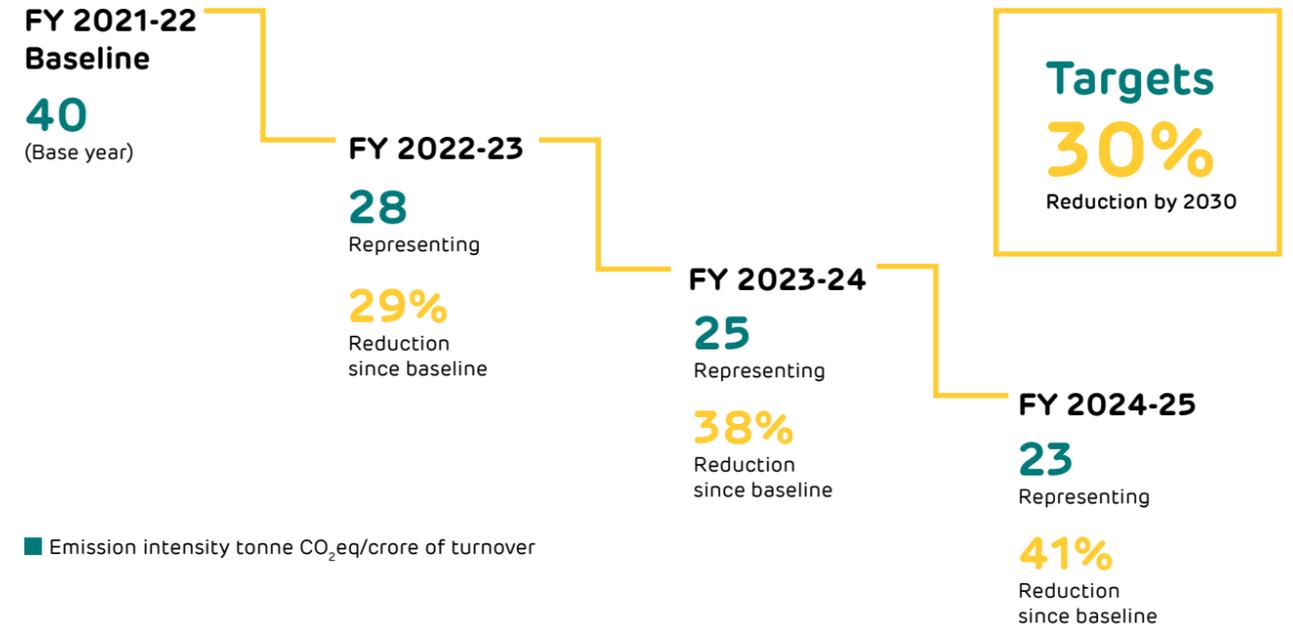
Net Zero Targets

Aiming to achieve Net Zero Emissions by 2045
(For Scope 1 and 2 only)

Intermediary Targets

Achieve 30% reduction in emission intensity by 2030
(Only for Scope 1 & 2 emission)

Reduction in Emissions Intensity (Scope 1 and Scope 2)



Strategically Reducing Our Operational Footprint



Low-Carbon Businesses Opportunities

Our E-Mobility and Compressed Biogas (CBG) businesses are enabling us to offer sustainable mobility and low-carbon energy solutions to the broader communities.

We are well on the path of diversification by installing 02 CBG plants with a Total 13 Tonne capacity and 546 EV charging stations.



Methane Leak Detection and Repair (LDAR)

Our Leak Detection and Repair (LDAR) programme helps us address any methane leaks into the environment and reduce our Scope 1 emissions.

In FY 2024-25, Methane Leak Detection Survey has been conducted for 7,200 kms of gas grid.



Adoption of Renewable Energy and Energy Efficiency

We are installing captive solar plants under our Solarisation initiative, to integrate renewable energy into our operational framework.

Rooftop solar panel are installed across 54 sites, including Company Owned Dealer Operated (CODO) and Dealer Owned Dealer Operated (DODO) CNG stations, City Gate stations and offices. We are generating 0.94 MW of solar power through these panels versus the target of 1.5 MW.



Decarbonisation of Fleet

To cut logistics-related emissions, we have transitioned all owned and contracted transport from HSD to CNG.

We averted 922 tCO₂e emissions due to 100% decarbonised fleet operations in FY 2024-25.

■ Decarbonisation Levers ■ Current Progress in Road to Net Zero

* <https://rbi.org.in/Scripts/PublicationsView.aspx?id=21769>

Strategically Reducing Our Operational Footprint



Investment in Low-carbon Technology – CCUS

Blending hydrogen with natural gas offers low emission solutions for the energy sector. We also plan to consider Carbon Capture, Usage and Storage (CCUS) technologies in the coming years, based on its effectiveness and nation's readiness.

We have implemented a pilot scale project in Ahmedabad GA, by blending of 2% of Hydrogen gas mixture in our PNG distribution network.



Carbon Sinks and Offsets

We undertake mass plantation to create natural carbon sinks and enhance carbon sequestration. We may also consider purchasing credible carbon and green credits to compensate for greenhouse gas emissions and invest in community-based carbon offset projects.

2.7 lakh+ trees planted under the Adani Group's Pledge for planting 100 million trees by 2030.



Carbon Pricing

The SATAT (Sustainable Alternative Towards Affordable Transportation) scheme, launched by the Government of India in October 2018, aims to promote the production and usage of Compressed Biogas (CBG) as a green, renewable fuel for the transportation sector.

Additionally, there is a growing possibility that the CBG blending mandate could evolve to incorporate formal carbon pricing mechanisms, such as Carbon Credit Trading Schemes (CCTS) or Emissions Trading Systems (ETS).

To assess the attributing costs and financial consequences related to the emission of CO₂ per tonne or its equivalent greenhouse gases, we have established an Internal Carbon Pricing (ICP) at ~USD 21-25 using Shadow Pricing Mechanism, contingent upon the level of intensity and emissions.



Climate Risk Assessment and Transparent Disclosures

We consider climate risks into our business decisions and strategies to create a future-ready climate resilient business.

We have digitalised our greenhouse gas inventory process and set clear emission reduction goals and strategies. Our GHG emissions are measured and reported transparently using GHG protocol data and other international standards.

We conducted climate risk assessment in FY 2024-25 covering ATGL operations to ascertain the vulnerabilities against the climate-related threats.



The latest climate risk assessment report can be accessed from [here](#).

- Decarbonisation Levers
- Current Progress in Road to Net Zero

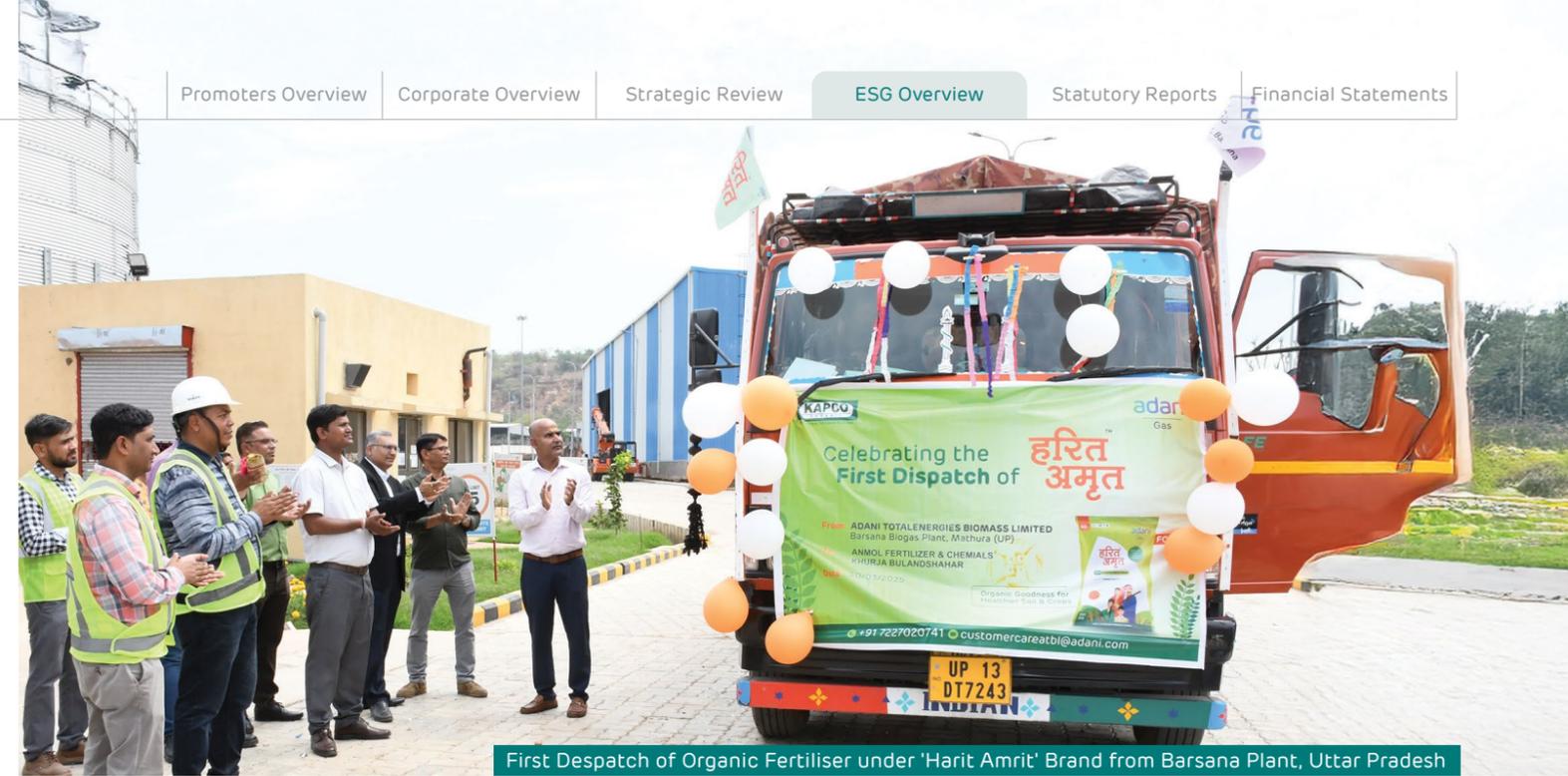
Performance-linked Climate Incentives

We have linked climate and sustainability performance metrics to the incentives of leadership team and employees, to align with ATGL's ESG ratings, commitments and climate transition plan.

The incentives for the Executive Board are crucial in driving the Company's environmental commitments and climate transition plan. The incentives ensure that Board member provide strategic oversight and align our efforts with the Company's climate-change initiatives. This alignment guarantees that our leadership is focussed on achieving specific environmental targets.

The Nomination and Remuneration Committee's recommends remuneration framework, including the incentives. The incentives of CEO, CSO, CFO and CRO and sustainability managers are tied to the achievement of sustainability targets, improvement in ESG ratings, and compliance with environmental regulations and standards. Some of these KPIs are reduction in GHG emission & emission intensity, installation of solar panels, achieving Zero Waste to Landfill certification for four sites, mass (tree) plantation, decarbonisation of fleets etc.

'Maadhyam', an Adani Group online reward scheme, enables employees to share impactful ideas with the Chairman and win incentives ranging from ₹5,000 to ₹50,000 for successful implementation.



First Dispatch of Organic Fertiliser under 'Harit Amrit' Brand from Barsana Plant, Uttar Pradesh

Energy and Emission Management

Approach

Our Board-approved [Climate Change Policy](#) and [Energy Management Policy](#) guide our strategies and operations to optimise our energy use and reduce emissions through renewables, innovative technology, and low-carbon alternatives. We conducted energy conservation audits for sites, including CNG stations, City Gate stations and offices.

These audits have helped us implement innovative energy-efficient solutions such as installation of occupancy sensors, energy-efficient fans, and energy-saving air conditioners. While the precise quantification of the impact is difficult due to the complexity of energy optimisation, the implementation of these measures has undoubtedly enhanced the efficiency of our natural gas and electricity consumption.

CASE STUDY

IGBC Gold Certified Corporate Office at Inspire Business Park

Background

The IGBC Gold certification for our Corporate Office at Inspire Business Park shines as a key milestone in our sustainability journey. The corporate office is designed with cutting-edge technologies and eco-friendly materials, optimising resource efficiency. The building's energy management system is optimised to reduce consumption and enhance operational efficiency, while the advanced water management system supports conservation and recycling. Additionally, the waste management protocols in place ensure minimal environmental impact through effective segregation, recycling, and disposal methods.

Impact

- Score of **70** GOLD rating
- 23%** Enhanced energy efficiency
- 32%** Enhanced water saving potential
- 6.3%** Renewable power consumption
- 100%** Wastewater & wet waste recycling

Way Forward

The IGBC Certification – Gold rating is a blueprint for future projects, with plans to extend it across all our CNG stations. By implementing these green building standards, we aim to create a network of sustainable and energy-efficient facilities that contribute to our overall environmental goals.

3%

Reduction in energy intensity from FY 2023-24

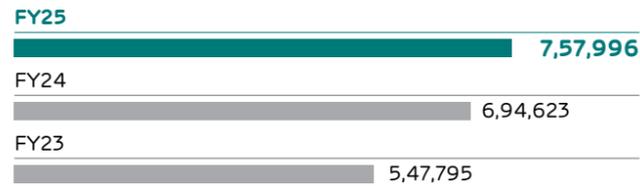
1,25,862

MtCO₂e emissions (Scope 1 & 2) during the year
■ **946 MtCO₂e** from 2021-22 baseline

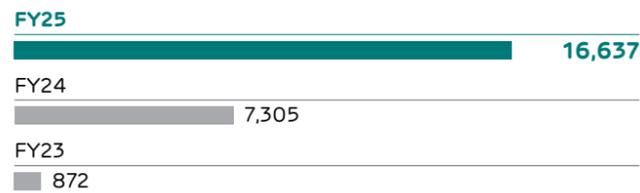
Energy Performance in FY 2024-25

Energy consumption during operations includes electricity from the grid and fuel used in the compressors at Gas dispensing facilities. There was no consumption of fuel from renewable sources.

Total Energy Consumption (GJ)



Total Energy Consumption Outside of the Organisation (GJ)



Note: The above figures are for energy consumption at our EV charging stations.

Reduction in Energy Consumption in FY 2024-25

Amount of energy savings due to conservation and efficiency initiatives - LDAR (in GJ)	6,761
Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all	Fuel
Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it	Y-o-Y
Standards, methodologies, assumptions, and/or calculation tools used	Based on saving in gas of fugitive emission through LDAR.

For computational details, refer environmental annexure on Pg. 150-153

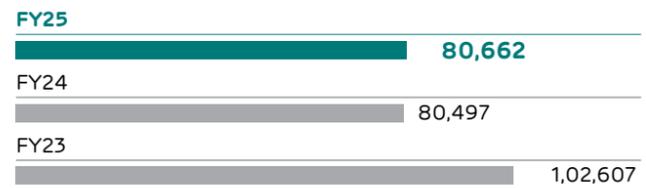
Emissions Performance in FY 2024-25

All GHG emissions are reported in CO₂ equivalents. ATGL sources its grid electricity directly from the local grid. ATGL's Scope 2 emissions are reported solely using the location-based method, representing emissions from the local grid electricity used.

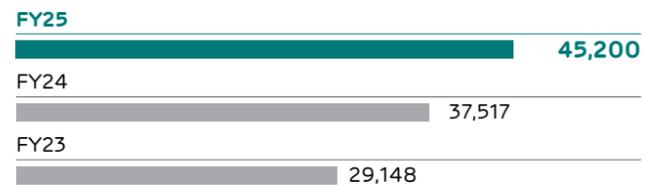
We use renewable energy generated by the captive rooftop solar panel installed across our sites to power our operations which effectively offsets our Scope 2 emissions. Total location-based emissions, were at approximately 45,200 metric tonnes of CO₂e in the reporting year.

Methane leaks are the primary source of our Scope 1 emissions. Our Advanced Leak Detection System has significantly improved quantification and reporting of methane leaks, which was earlier done using assumption-based reporting. Methane leaks account for 0.16% of the total gas sold during the reporting period.

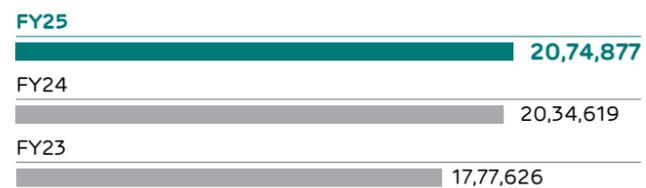
Gross Direct GHG Emissions (Scope 1) (Metric Tonnes of CO₂ Equivalents)



Gross Energy Indirect Location-Based GHG Emissions (Scope 2) (Metric Tonnes of CO₂ Equivalents)

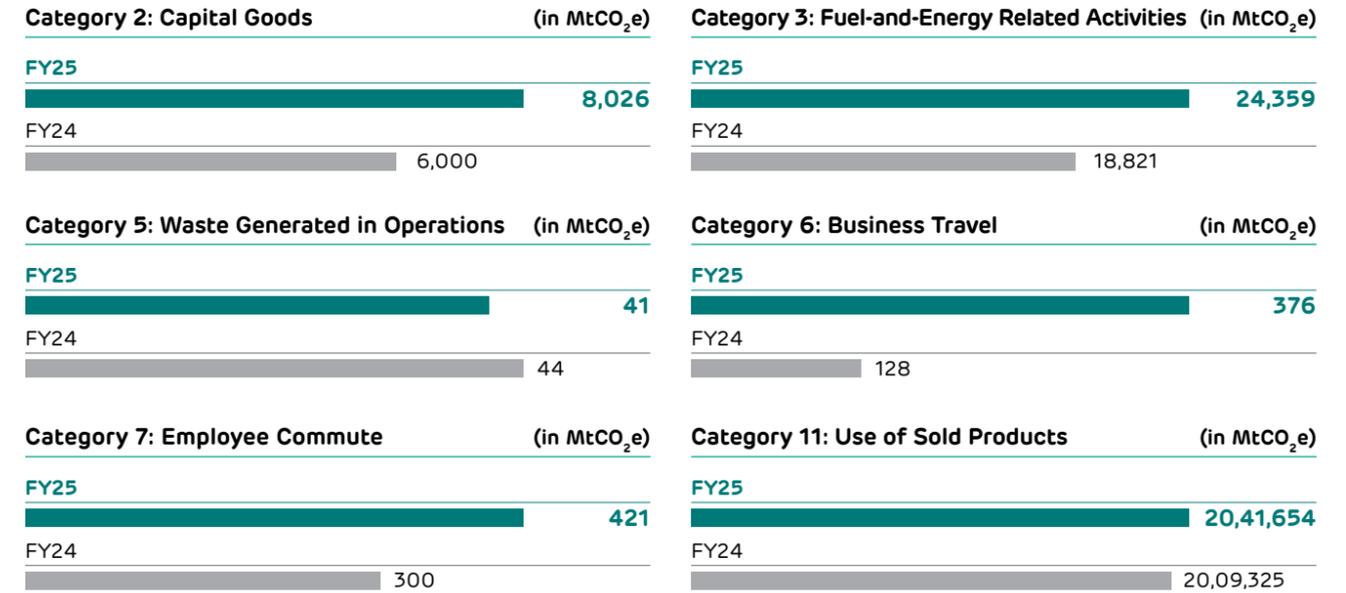


Total Value Chain GHG Emissions (Scope 3) (Metric Tonnes of CO₂ Equivalents)



Value Chain Emissions Across Scope 3 Categories

98.40% of our value chain emissions are from 'use of sold products' category which was 98.76% in the last reporting year. We currently report our value chain emissions across the following Scope 3 categories:



Note: The other Scope 3 categories are not applicable for ATGL business and hence are not reported in the table above.

For computational details, refer environmental annexure on Pg. 150-153

Ozone-Depleting Substances (ODS) and Other Air Emissions in FY 2024-25

Our heating, ventilation, and air conditioning (HVAC) systems have historically utilised refrigerants such as R22, R134, R407C, and R410, essential for our business operations. Recognising the environmental impact, we have transitioned to refrigerants with minimal Ozone Depleting Potential (ODP) and Global Warming Potential (GWP). This shift aligns with our commitment to sustainability and reducing our carbon footprint. We are currently in the process of mapping emissions under this category to ensure accurate reporting and continuous improvement in our environmental performance.

Indicators	Unit	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	Target FY 2025-26
Direct NOx emissions (MT)	Metric tonnes	336	103	143	181	247	225
Data coverage (as % of denominator)	Percentage of revenue from GA sites	100	100	100	100	100	(Around 10% Reduction)

NOx emissions are estimated from the emissions generated through fuel combustion of fleets (HCVs) & AEO Vehicles

Access our Annual Environment Statement for air emissions.

Read more about our energy and emissions under BRSR-Principle 6 on Pg. 334

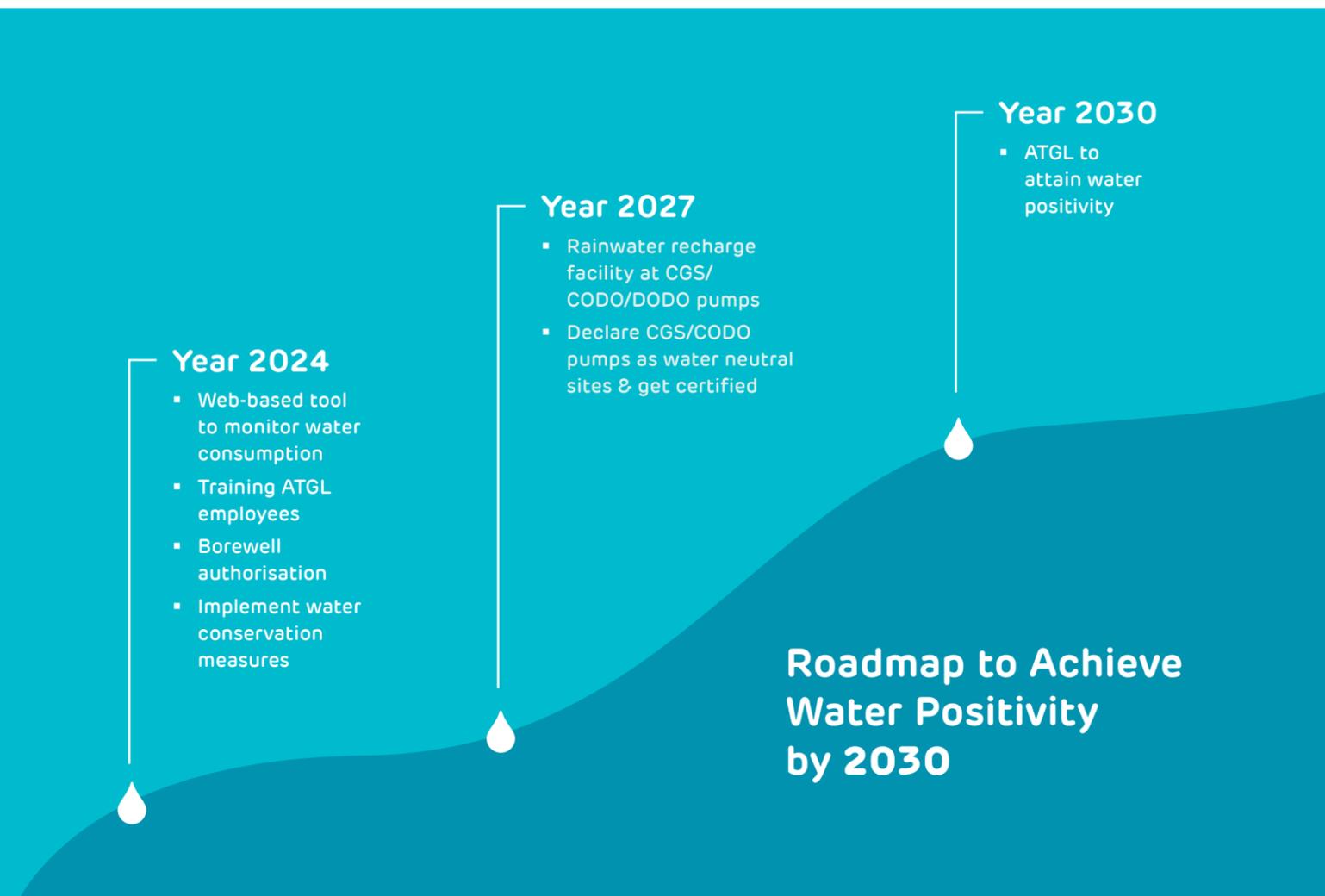
Water Management

Approach

We consider water as a shared resource and its management is a part of long-term sustainability strategy. Our **Board-approved Water Stewardship policy** focusses on effective water management practices, driving compliance with applicable laws and regulations. Through comprehensive discussions, our management has established the aspirational goal of achieving water positivity by 2030. Our primary water consumption is designated for domestic usage at our facilities and not

used in any process operations. Therefore, there is no discharge of industry effluent. Since, we operate in a service-oriented industry, water consumption does not directly affect the procurement of goods, services or the overall value chain. Some of our sites have borewells to access groundwater resources, while certain sites use third-party water tankers to replenish their overhead tanks. We use fresh water solely for domestic purposes and all wastewater generated in the form of sewage is directed to the municipal sewer line.

▶ We are committed to achieving water positivity by 2030



Improving Water Use Efficiency

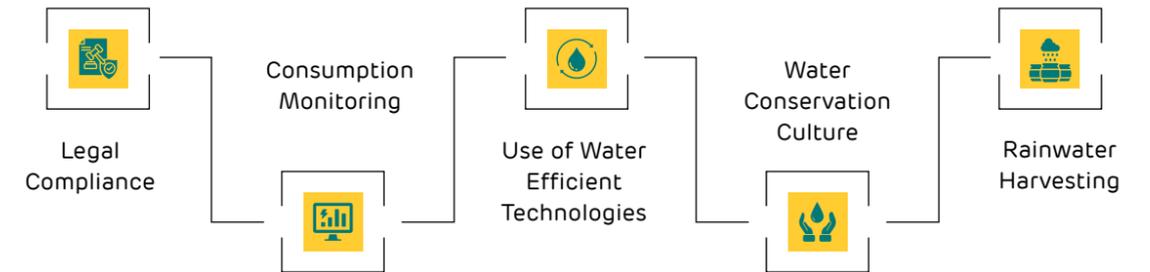
Water meters installed at all sites to monitor water consumption, prevent leaks and wastages for enhancement of accuracy & transparency

Regular water audits are conducted at sites with support of third-party to identify improvement opportunities in FY 2024-25

Environmental Impact Assessments (EIA) are conducted for all Geographical Areas (GAs) with emphasis on water, and outcomes are considered to enhance our business operations

Water conservation measures are taken across sites, including rainwater harvesting to improve water use efficiency

Water Neutrality



Rainwater Harvesting

We actively promote rainwater harvesting to mitigate our reliance on conventional water sources and enhance groundwater recharge.

To date, we have successfully installed rainwater harvesting structures at CGS and CNG station sites. Furthermore, we are steadfast in our commitment to mandatorily incorporate rainwater harvesting infrastructure in all new upcoming stations. Our goal is to achieve water neutrality certification for CODO stations, ensuring sustainable water management practices across our operations.

This initiative is particularly crucial in the context of climate change and increasing droughts, as it helps to secure water resources and maintain groundwater levels.

Total Water Withdrawn & Consumption* (in kilolitres)

FY25	FY24	FY23
1,07,709	72,323	54,055

- *All water withdrawals equate to recorded water consumption
- Recorded water consumption refers to the water meter-based value and in some cases it is based on average footfall of visitors and employees where water meter is not available
 - Third-party water refers to water provided by municipal water suppliers through tankers
 - Out of the total water withdrawal above, the freshwater water withdrawal ($\leq 1,000$ mg/L Total Dissolved Solids) in FY 2024-25 is: 107709
 - Out of the total water withdrawal above, the other water ($> 1,000$ mg/L Total Dissolved Solids) in FY 2024-25 is: Zero

▶ Read more under BRSR-Principle 6 on Pg. 334



Waste Management

Approach



We have instituted comprehensive policies, stringent procedures, and monitoring systems to ensure responsible waste management. Our policy on waste management emphasises resource efficiency and waste management. We continually seek innovative measures meet our sustainability goals, comply with required waste management standards and ensure a cleaner future for all. Our key waste minimisation initiatives focus on paper-saving measures and creating Single-Use Plastic-Free office premises.

We have waste management facilities at site for its proper collection, segregation, storage and disposal in environment-friendly manner in accordance with hazardous waste management rules & guidelines published by pollution control boards. ATGL operations have no major impact on land degradation and all waste generated comes from organisation's own activities, except for the used oil collected from customers at CNG stations.

Waste Categories	Waste Types	Waste Handling
Hazardous Waste	E-waste, Battery waste generated from own operations	Safely collect, segregate & dispose through PCB authorised recycling vendor as per the Hazardous and Other Wastes (Management and Transboundary Movement) Rules.
	Other waste Used oil collected from the customers at CNG stations and generated by own operation.	
Non-Hazardous Waste	Plastic Waste (Small MDPE pipe, Empty barrel), generated from own operation	
	Metal scraps generated from old assets	Selling to third-party vendor

[Access our waste management policy from here.](#)



05

Offices certified as Single-Use-Plastic-Free

04

GA sites certified as Zero Waste to Landfill (ZWL)

Over 99%

Waste avoided/diverted from landfill through recycle/reuse

Waste-related Performance in FY 2024-25

(in Metric Tonnes)

Indicators	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Waste Generated				
Hazardous Waste	55.97	63.60	33.61	37.30
Non-Hazardous Waste	183.99	129.78	130.60	102.47
Total Waste Generated	239.96	193.38	164.21	139.77
Waste Diverted from Disposal				
Hazardous Waste	55.97	63.60	33.61	37.30
Non-Hazardous Waste	183.99	129.78	130.60	102.47
Total Waste Diverted from Disposal	239.96	193.38	164.21	139.77

[Read more under BRSR-Principle 6-E9 on Pg. 337](#)



Biodiversity Management

Approach

Our [Biodiversity Policy](#), approved by the Board, emphasises the importance of assessing the impacts of our operations on surrounding biodiversity and creating net positive impact. This entails developing and implementing biodiversity action plans to effectively mitigate negative impacts.

As a proud signatory of the India Business and Biodiversity Initiative (IBBI), we have aligned ourselves with global best practices, striving to avoid, reduce, and restore any adverse effects on biodiversity. Our initiatives include a comprehensive manual for the use of land, water, and biodiversity resources, as well as a strategic approach to responsible land use. We also adhere to the ten key areas of biodiversity integration within our operations, to ensure considering and addressing the impact of our operations.

▶ We are committed to conserving and enhancing biodiversity and have a net positive impact on the environment by 2030

Avoid, Reduce and Restore Strategy



Avoid

- Avoid ecologically sensitive areas
- Avoid cutting of trees, especially where bird nesting is observed



Reduce

- Route optimisation to prevent intrusion of gas pipelines into wildlife habitats
- Alternative routes to minimise impact on wildlife areas, wherever possible



Restore

- Forest and habitat restoration through 'Revival of Roots' initiative in Kajalgaon, Assam
- Mass plantation in Pusad of Maharashtra to expand green cover (planned in FY 2025-26)

Biodiversity Management Process

Biodiversity is integrated into our Enterprise Risk Management (ERM). Regular audits and assessments help us identify the areas for improvement and ensure continuous compliance. We undertake comprehensive Environmental Impact Assessment (EIA) of all Geographical Areas (GAs) before commencing our operations. Based on the outcome of these assessment, we develop comprehensive biodiversity management plans to address the impacts related to land, water and biodiversity. These reports are submitted to the concerned regulators for compliance verification. In FY 2024-25, there were zero significant biodiversity risks found as per the ESIA study. There are no IUCN Red List species and national conservation list species with habitats found in areas affected by the operations of our organisation, by level of extinction risk including critically endangered, endangered, vulnerable, near threatened, least concern.

 [Access our EIA reports here.](#)

Biodiversity/Environment Impact Assessment of Sites

Parameters	FY 2023-24	FY 2024-25
Total number of Geographical Areas (GAs)	33	33
Total sites covered under biodiversity/environment impact assessments	19	23
Total sites which are in close proximity to critical biodiversity/environment	0	0
Total sites in close proximity to critical biodiversity/environment for which biodiversity/environment management plans are prepared	NA	NA
Other low-priority sites for which biodiversity/environment management plans are prepared	03	04

Tree Plantation for a Greener Future

We extensively undertake tree plantation initiatives to create natural carbon sinks for carbon sequestration, reducing GHG concentrations, improving the overall biodiversity and enhancing climate resilience. The tree plantation activity under Greenmosphere and Revival of Roots initiatives were carried out in consultation with the officials of the local authorities and communities, who were engaged throughout the execution and maintenance activities.

 [Read more under Corporate Social Responsibility on Pg. 195](#)

 [Read more about biodiversity performance under BRSR-Principle 6 on Pg. 334](#)

Annexure 1

Data Computation Methods for GHG Emissions

Baseline for Calculations of Scope 1, 2 and 3 Emissions	FY 2021-22
Gases Considered in Calculation	Carbon dioxide (CO ₂), N ₂ O and methane (CH ₄), with all emissions being reported in CO ₂ e units
Biogenic Emissions	There are no Biogenic CO ₂ emissions in FY 2024-25
Standard, Methodologies, Assumptions	GHG Protocol
Consolidation Approach	Operational Control
Organisation-specific Metric (the denominator) Chosen for GHG Emission Intensity	Revenue from Operations is used as the denominator to calculate Energy Intensity
Types of GHG Emissions Included in the Emission Intensity	Emission intensity includes only Scope 1 and 2

Inclusions in Scope 1 Emissions

Stationary Combustion	The total quantity of natural gas combusted by gas-based compressors is measured and used for emission calculations.
Mobile Emissions	The total quantity of petrol, diesel and Compressed Natural Gas (CNG) used by vehicles under the operational control of ATGL was considered.
Fugitive Emissions	Methane leaks from the gas grids are continuously monitored using an advanced leak detection system. Additionally, gas loss during venting and compression is also considered in the calculation for fugitive emissions.

Inclusions in Scope 2 Emissions

Purchased Electricity Consumption	Comprises emissions resulting from the production of purchased electricity, from the Company's own facilities and those under leased management with 'operational control'. This involves assessing the consumption of purchased electricity from utility providers, some of whom issue monthly invoices, while in other cases, meter readings are considered. This data is collected to track the consumption of electricity units and is recorded on the dashboard for reference and analysis.
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Scope 3 Emission Categories

Categories	Description	Emission Calculation Methodology
Category 2: Capital Goods	Comprises emissions from production of capital goods that ATGL purchases, including pipelines. The lifecycle emissions (cradle to gate) for pipelines were calculated and included in this category, within which the Company plans to include all capex expenditures in the coming years.	Average data method was used, where total volume of steel used determine based on steel lowering. Emission factors for this category were referred from https://rmi.org/wpcontent/uploads/2022/09/steel_emissions_reporting_guidance.pdf
Category 3: Fuel-and-energy-related Activities (Not Included in Scope 1 or 2)	Comprises emissions from transportation and distribution of energy that ATGL purchases, such as transmission and distribution (T&D) losses. The emissions from T&D losses for every unit of grid electricity and gas, diesel procured were calculated and included in this category.	T&D losses occurring in the grid for the consumed electricity and emissions due to extraction, production, and transportation of fuels consumed by the organisation. Central Electricity Authority of India published emissions factors and declared T&D Losses.
Category 5: Waste Generated in Operations	Comprises emissions from waste generated by ATGL's operations. The amount of waste disposed was multiplied by the waste-specific emission factor.	We have diverted 99.99% of waste from landfill and our 4 GAs certified as Zero waste to landfill by M/s Intertek Private Limited for O&M sites
Category 6: Business Travel	Comprises emissions from business travel undertaken by ATGL employees. The total distance and mode of business travel was tracked and multiplied by the emission factor specific to India.	Distance-based data for air, rail and road mode was selected as data input. We refer emission factor for this category from Transport Emission Factors India GHG Program
Category 7: Employee Commute	Comprises emissions from commute undertaken by ATGL employees to and from work. The employee commute calculation was sourced from a survey conducted within ATGL to understand the commuting practices of its employees. The results of the survey were utilised for calculating the GHG emissions stemming from the employee commute.	Average data method based on survey responses received from employees. Data inputs include mode of travel and distance. We refer GHG Protocol mobile combustion guidance for determining the emission factors.
Category 11: Use of Sold Products	Comprises emissions from use of products that ATGL sells, such as natural gas. The volume of gas sold by ATGL during the reporting period was considered for estimation of the emissions in this category. The total volume was multiplied with the emissions factors of natural gas during its combustion.	Fuel-based method was used, where total volume of sold natural gas was taken in consideration. We refer IPCC cross sector tools for determining the emission factors.

Data Computation Methods for GHG Emissions

Base year for Energy Consumption Data	FY 2021-22
Standards, Methodologies, Assumptions, and/or Calculation Tools Used	Conversion factors for electricity and various fuel sources as defined in the IPCC 5 th Assessment Report Note: Heating, cooling and steam consumption is not applicable to our business
Source of Conversion Factors Used (for energy consumption within as well as outside the organisation)	CDM - Emission factors by Central Electricity Authority
Energy Sold in FY 2024-25	4,622 MWh Electricity unit consumed for selling through EV charging station (April 2024 to March 2025)
Organisation-specific metric (the denominator) chosen to Calculate Energy Intensity	Revenue from Operations is used as the denominator to calculate Energy Intensity
Types of Energy included in the Intensity Calculation	Both fuel and electricity consumed within the organisation are included in the intensity calculation

Source of Emission Factors & Global Warming Potential (GWP) Referenced

Description	Unit	Reference
Diesel	tCO ₂ /TJ	IPCC Cross Sector Tool
Diesel	tCH ₄ /TJ	https://ghgprotocol.org/calculation-tools-and-guidance
Diesel	tN ₂ O /TJ	
Natural Gas	Kg of CO ₂ e /Tonnes of NG	
CNG	tCO ₂ e/tCNG	
Gas Sold – CNG	tCO ₂ e/tCNG	
Gas Sold – PNG	kg CO ₂ eq/m ³	
Natural Gas	GWP	

Source of Emission Factors & Global Warming Potential (GWP) Referenced (Cont'd...)

Description	Unit	Reference
Air	kgCO ₂ e/passenger.km	India GHG Programme https://indiaghgp.org/transport-emission-factors
Rail	kgCO ₂ e/passenger.km	
Auto Rickshaw	kg CO ₂ /km	
Car	kg CO ₂ /km	
Bus	kg CO ₂ /pax-pkm	
Owner Car	kg CO ₂ /km	
Cab/Third-Party Taxi Services	kg CO ₂ /km	
Own Two-wheeler	kg CO ₂ /km	
Metal Waste	kg CO ₂ eq/kg	EPA SGEC Tool https://www.epa.gov/climateleadership/simplified-ghg-emissions-calculator
Other Waste	kg CO ₂ eq/kg	
Steel Pipes Production	tCO ₂ e/t	Steel GHG Emissions Reporting Guidance https://rmi.org/wp-content/uploads/2022/09/steel_emissions_reporting_guidance.pdf
Grid Electricity Losses	kg CO ₂ e/kWh	RBI Declaration – State-wise https://www.rbi.org.in/Scripts/PublicationsView.aspx?id=21531
Natural Gas Distribution Losses	kg CO ₂ e/Tonne	DEFRA Database https://www.gov.uk/government/publications/greenhouse-gas-reportingconversion-factors-2023

Social – employees

Creating impact by nurturing talent

At ATGL, we believe that our employees are the driving force behind our success. We are committed to fostering a workplace that values innovation, diversity, and continuous growth. From leadership development to employee well-being initiatives, our HR practices are designed to empower individuals, cultivate talent, and create a culture of ownership. By providing strategic learning opportunities, meaningful engagement and focussing on employees well-being, we enable our people to thrive while contributing to a sustainable future.

Key Linkages

SDGs



Associated Risks

R1 R8 R11

Material Topics

M11 M22

Capitals



Strategic Priorities

S4

Key Performance Highlights for FY 2024-25

691

Total workforce

▲ 43 (6.62%) from FY 2023-24

3.47%

Women in the workforce

65

Average hours per FTE of training provided with 64 average hours for female employees

Human Capital Development Focus Areas

At ATGL, we believe that attracting, developing and retaining top talent is critical to our success. To achieve this, we have designed an effective talent management strategy aimed at building a future-ready workforce by fostering a culture of learning, engagement, and performance. Our approach encapsulates the following key areas:

- Implement HR-focussed initiatives for people development
- Develop peoples' capacities and capabilities
- Develop leadership through focussed L&D programmes
- Drive digital initiatives across all levels & functions
- Institutionalise, sustain and mitigate risks related with top talent
- Provide accelerated career pathways to engage top talent
- Induct talent with niche and other specialised skills to bridge gaps

Our Workforce Snapshot

Total Workforce in FY 2024-25

Our Employees

All our permanent and non-permanent employees are employed on a full-time basis, with no employees

under non-guaranteed hours or part-time basis. Our operations span multiple Geographical Areas (GA's) across India. We have also incubated two wholly-owned subsidiaries (ATBL & ATEL).

Our Workers

100% workers in our workforce are engaged through contractual arrangements with manpower service agencies (except permanent workers), in line with our operational requirements. Majority of these workers are engaged as supervisors within ATGL's Support Services Business Division. We pay no less than the stipulated minimum wage to our workers, as per the contractual obligations. We implement meticulous verification processes and obtain contractor declarations to ensure that they align with the expected labour standards and maintain workers dignity. For any discrepancies found, we take appropriate action against the concerned manpower agency.

Senior Management

In ATGL, Senior Management Personnel include those at the General Manager level and above. In FY 2024-25, we hired 14.28% of our senior management personnel from the local community. We define local communities as individuals who are residents/inhabitants of the same geographical area, where our operations are based.

Employee Category	Male Age group			Female Age group			Total
	>50 Total years	30-50 years	<30 years	>50 Total years	30-50 years	<30 years	
Permanent and Other Than Permanent Employees							
A Top Management (Governance Bodies)	1	01	00	00	00	00	02
B Senior Management	18	06	00	00	00	00	24
C Middle Management	12	76	00	00	00	00	88
D Junior Management	11	203	192	00	04	13	423
E Total Permanent Employees (A+B+C+D)	42	286	192	00	04	13	537
F Total Other than Permanent Employees	04	00	00	00	01	00	05
Workers							
G Permanent Workers	03	35	00	01	02	00	41
H Other Than Permanent Workers	04	47	54	00	01	02	108
I Total Workers (G+H)	07	82	54	01	03	02	149
Total Workforce (E+F+I)	53	368	246	01	08	15	691

Footnotes:

100% of our workforce represents Indian nationality as we do not have operations outside India. The above workforce figures are reported in Full-time Equivalents (FTE).

Educational Profile

35.3

Years average age of the workforce in FY 2024-25

66

Graduates

26

Masters

326

Engineers

77

MBA's

15

Chartered Accountants

Talent Acquisition and Retention

Talent Acquisition

We hire exceptional talent, following a rigorous merit-based recruitment process based on the skills and competencies of the candidate.

Inducting New Talent

We hire fresh talent through campus placement as Graduate Engineering Trainees (GETs) and Executive Trainees (ETs), to embark on their career journeys with us.

Prioritising Internal Mobility

As a part of our HR strategy, we prioritise filling open positions through IJP. We prefer internal talent over external hires for new roles within the Company. This initiative enables employees to transition into new roles, locations and departments in alignment with their career aspirations, passion and personal exigencies. The programme offers multi-fold benefits, including internal talent development, enhanced employee engagement, optimal skill utilisation, reduced turnover and retention of institutional knowledge.

134

New hires onboarded

5.97%

Open positions filled through internal candidates in FY 2024-25



Talent Retention through a Nourishing Work Culture



Speakerphone Culture

We cultivate operational openness at work through candid, courageous and participatory discussions



Small-team Culture

We empower our people to take on greater responsibilities for accelerated career growth, enabling their progression



Management-Employee Interactions

We promote regular dialogues between management and employees to understand employee objectives and align them with organisational goals through participatory discussions

New Hires and Employee Turnover in FY 2024-25

	Age Group	TM	SM	MM	JM	OM	Total	Percentage
New Hires								
Male	< 30 years	00	00	01	57	00	58	43.3%
	30-50 years	00	03	13	54	00	70	52.2%
	> 50 years	00	04	01	00	00	05	3.7%
Female	< 30 years	00	00	00	01	00	01	0.7%
	30-50 years	00	00	00	00	00	00	0.0%
	> 50 years	00	00	00	00	00	00	0.0%
Employee Turnover								
Male	< 30 years	00	00	00	39	01	40	41.24%
	30-50 years	00	02	12	34	04	52	53.61%
	> 50 years	00	02	01	00	00	03	3.09%
Female	< 30 years	00	00	01	00	00	01	1.03%
	30-50 years	00	01	00	00	00	01	1.03%
	> 50 years	00	00	00	00	00	00	0.0%

TM: Top Management; SM: Senior Management; MM: Middle Management; JM: Junior Management; OM: Other than Management Positions

Footnotes:

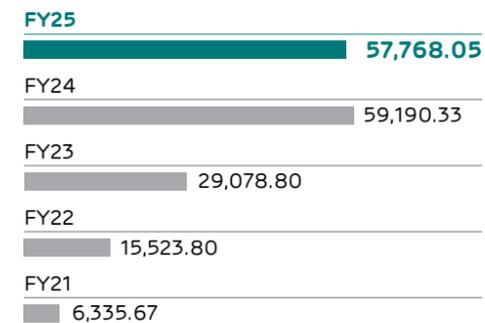
00 Foreign nationals hired during the year

17.06% turnover rate for employees and 16.20% turnover rate for contractual workforce



Recipients of Long Service Award

Average Hiring Cost/FTE (in ₹)



Diversity, Equal Opportunity & Inclusivity (DEI)

We acknowledge workforce diversity as important drivers of innovation, productivity and growth. From recruitment to career progression, we provide equal opportunities to all our employees. Our [Policy on Diversity, Equity and Innovation \(DEI\)](#) provides strategic framework to improve organisational

capabilities, promoting equality and inclusivity across operations. We hire talent from diverse genders, backgrounds and demographic landscape, with a focus on improving women's representation in our workforce. We deploy women across various roles such as Projects, Gas Sourcing, Business Development and other functions, through Internal Job Postings (IJPs).

We maintain a zero tolerance towards any form of discrimination and encourage employees to report any instances to the DEI safeguard forum. All allegations are duly investigated, and appropriate disciplinary actions are taken in substantiated cases.

Regional Diversity in Hiring



Fair Remuneration and Pay Equity

We offer fair and competitive remuneration based on employees' skills, experience and market standards, without any discrimination. We offer more than minimum wages to our employees and workers.

01:1.05

Ratio of basic salary and remuneration of women to men

01:01

Ratio of entry level wage of women to men

Gender Pay

Employee Level	Average Women's Salary (in ₹)	Average Men's Salary (in ₹)
Executive level (base salary only)	00	1,79,60,004
Executive level (base salary + other cash incentives)	00	8,21,77,170
Management level (base salary only)	3,40,051	6,22,691
Management level (base salary + other cash incentives)	10,87,143	17,91,599
Non-Management level (base salary only)	2,15,036	3,06,228

Learning & Development

Approach

At ATGL, we implement various learning and development programmes to empower our workforce to stay agile, innovative and future-ready, driving both individual and organisational success. We offer a diverse range of programmes, including leadership development, behavioural and technical skill enhancement, digital learning, and Environmental, Social and Governance (ESG) topics. Employees also benefit from mentorship programmes, cross-functional learning opportunities and structured

career progression pathways. Our online training platform, e-Vidyalaya, provides employees with 24X7 learning opportunities across wide range of domains and topics.

Training Needs Assessment

We conduct training needs assessment of our employees, especially for the ones in critical roles, through observations, feedback and inputs from the respective heads of departments. Customised training programmes are developed to bridge the identified learning and skill gaps and are delivered by the experts.

Our online training platform, e-Vidyalaya, provides employees with 24X7 learning opportunities across wide range of domains and topics



Safety Leadership training by HSE Head

Leadership Development Programmes

Programme Name	Description	Business Benefits	FTEs Participated
Takshashila	A 6–8 month programme delivered in partnership with Indian Schools of Business	Functional Leaders Development Programme	01
Young Leaders Programme (YLP)	Its 21 days programme consisting of 15 days of residential course in IIMs and 6/7 days of on-line programme for junior to mid-level engineers to provide them exposure to strategic, operational existence etc.	Will be able to lead their respective areas for transformation	10
Technical Education (IIT)	Two Safety Engineers have been sent for 2 years full time M. Tech course in Safety Engineering & for the current at COSEA of IIT, Kharagpur	Will act as Change Agent in strengthening safety system and act as resource person in business	02

Skill Upgradation Programmes

ATGL is driving digital transformation across its operations. To enhance digital skills of our employees, we have mandated them to complete virtual training on digital skills, followed by an assessment. As part of our Saksham programme, we are providing specialised Oracle-based trainings to our HR personnel, enabling a strategic transition from conventional HR-led processes to a digitally-driven, employee-centric career ownership model.

Training and Development in FY 2024-25

Employee Category	Number of Employees		Total Training Hours		Average Training Hours	
	Male	Female	Male	Female	Male	Female
Senior Management	24	00	511	00	21	00
Middle Management	88	01	7399	04	84	04
Junior Management	406	17	27,892	1,341	68	78
Below Engineer Positions	38	03	38	03	01	01

Performance Management

Our performance management system embeds agility, objectivity, adaptability and responsiveness in performance management and career development process.

- Individual performance goals, roles and responsibilities are clearly established for all employees
- 360° performance feedback and discussion take place between employees and managers, to evaluate progress against set goals

₹ 11,245

Average training & development expenditure per FTE

91.34%

Employees received performance and career development reviews

Employee Well-being and Benefits

At ATGL, we prioritise the well-being and professional growth of our employees. Our comprehensive range of benefits and support initiatives are designed to enhance their work-life balance, financial security, productivity and overall job satisfaction. We are not obligated to provide pension benefits to employees. We also do not offer stock ownership to our employees.

Employee Benefits and Support Programmes

- Comprehensive health and wellness benefits like medical insurance, preventive healthcare programmes, and mental wellness initiatives
- Physical health benefits such as health-checkups, medical consultation by doctors in corporate office
- Parental leave and family support

- Women self-care policy prioritising their health on their personal days
- Learning & Development Support
- Financial benefits such as loans and insurance

Minimum Notice Periods

In the event of significant changes in the organisation structure or the system, the HR team informs all employees through official communication by HR team 10 or 15 days in advance.

₹ 1.19 crore

Spent on employee well-being and benefits in FY 2024-25

Read more under BRSR-Principle 3 on Pg. 322



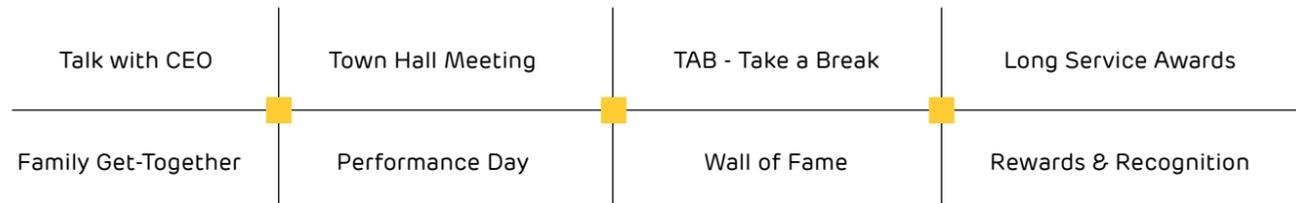
Adani Total Gas Cricket League, 2025

Engaging with Our Employees

At ATGL, we believe that an engaged workforce is the key to driving innovation, productivity and long-term success. Our employee engagement initiatives foster a culture of collaboration, open communication and continuous growth. Our initiatives include

professional development programmes, well-being support and recognition platforms that celebrate employee achievements and contribution. We actively engage with our employees through regular town halls, feedback and engagement surveys, seeking their feedback and insights to enhance our people practices.

Key Engagement Programmes



Employee Satisfaction

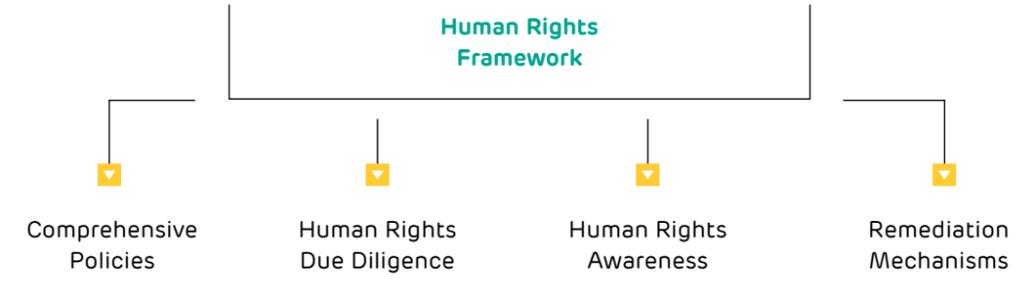
We conduct Gallup surveys through third-party once every two years, to assess employee satisfaction levels across various aspects such as job satisfaction, stress management, purpose and happiness index.

Human Capital Return on Investments (RoI)

Particulars (in crore)	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
(a) Total revenue	1,828.83	3,247.86	4,720.24	4,860.51	5,442.48
(b) Total operating expenses	858.49	2,568.82	4,005.05	3,982.1	4,582.68
(c) Total employee-related expenses (salaries + benefits)	51.52	54.73	55.68	66.71	56.68
Resulting HC (RoI) (a - (b-c)) / c monetary units	19.83	13.41	13.84	14.17	16.16
Total employees	425	466	550	549	578

Human Rights and Labour Relations

Human Rights Management Approach



At ATGL, we are committed to upholding and promoting human rights across our operations, ensuring a workplace built on fairness, dignity and respect. By embedding human rights into our corporate values, we create a responsible and inclusive environment that supports the well-being and rights of every individual.

We have established a comprehensive policy framework to uphold highest standards of human rights in our workplace and business practices. These policies align with globally recognised human rights standards and guidelines, fostering equal opportunities workplace, free from discrimination, harassment or forced labour. Our Board-level Corporate Responsibility Committee (CRC) provides oversight for the policy implementation across our business operations, ensured by the CEO and HR Head.

 Access our policies from [here](#)

ZERO

Incidents reported of violation of Human Rights including discrimination, harassment, child labour and forced labour

ZERO

Complaints received regarding the violation of human rights of Indigenous people

Human Rights Policy

We have adopted [Human Rights Policy](#) that aligns with the Universal Declaration of Human Rights, Social Accountability (SA 8000) Standards, International Labour Organisation on Fundamental Principles and Rights at Work as well as the United Nations Guiding Principles on Business and Human Rights.

Employee Code of Conduct

ATGL's [Employee Code of Conduct](#) applicable to all employees of ATGL and its subsidiaries, sets forth our human rights standards and expectations, which all employees and Directors are required to uphold.

Human Rights in Supply Chain

ATGL's [Supplier Code of Conduct](#) promotes lawful and fair business practices across supply chain, by promoting human rights, environment and business ethics. All our suppliers are strictly required to comply with the code. Human Rights parameters have also been integrated into our vendor onboarding process and all new vendors undergo thorough screening on those parameters. Every tender document includes human rights compliance requirement, that bidders must review and accept via the online portal.

Prevention of Sexual Harassment (POSH)

Our [Policy on Prevention of Sexual Harassment \(POSH\)](#) explains our zero tolerance approach to sexual harassment, ensuring a safe work environment for all employees and stakeholders, especially women. All POSH-related complaints are investigated and handled by our Internal Complaints Committee (ICC).

Embedding Policy Commitments

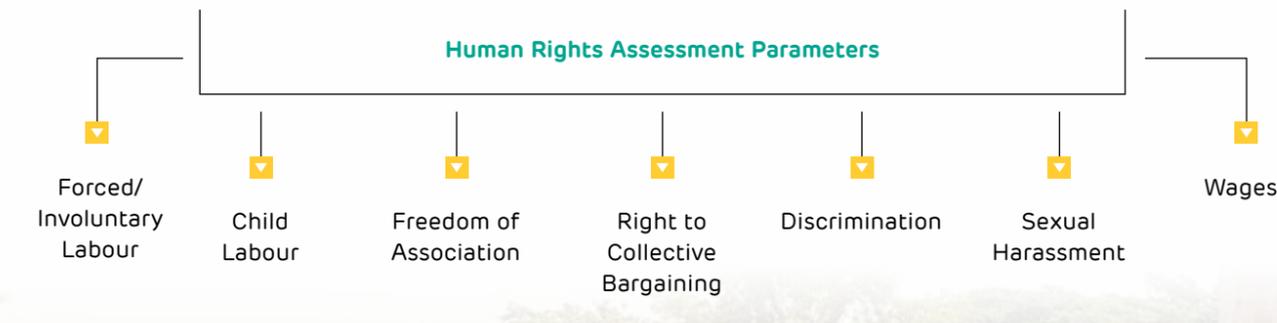
Human Rights Due Diligence and Assessment

We conduct human rights due diligence covering own operations, supplier operations and communities, to proactively identify, assess and mitigate potential human rights risks. We regularly review suppliers compliance on human rights related parameters and Supplier Code of Conduct, during contract execution.

The HR department carries out thorough background and police verification for the employees and contractual personnel respectively, during hiring or new employment, via external agency. Before onboarding the employees or hiring the contractual worker, the HR team validates their date of birth from the Aadhaar and birth certificate, to prevent the risk of child labour.

Human Rights due diligence is also a part of the overall ISO assessment. Furthermore, we conduct comprehensive due diligence before entering into new business engagements such as Joint Ventures, Mergers and Acquisitions.

Read more about Supplier Risk Assessment on Pg. 200



Human Rights Training & Communication

- Mandatory online trainings and awareness modules on human rights policies, required to be completed by all employees
- Mandatory awareness sessions for all new hires during induction, conducted through monthly orientation meetings to reinforce Code of Conduct, Human Rights Policies and Prevention of Sexual Harassment (POSH) policies
- Human Rights training is also provided to our security personnel who are on the payroll of third-party vendors
- All suppliers are trained on our human rights policies and procedures

100%

New hires covered through human rights training sessions

100%

Security personnel trained on human rights policies and procedures, including the third-party security personnel

Freedom of Association & Right to Collective Bargaining

ATGL has established a [Policy on Freedom of Association](#) to uphold employees' right to freedom of association and collective bargaining, without any interference and discrimination. The policy allows any potential employee unions to be recognised by ATGL's Board. However, there were no active employee unions, associations or collective bargaining agreements in place during FY 2024-25.

Human Rights Remediation

Our online Adani Grievance Management Tool and whistleblower channel allows the employees to freely raise their grievances and violations of the code, including human rights violations. The reported incidents are duly investigated and required actions are taken on all substantiated incidents.

Read more under:
BRSR-Principle 5 on Pg. 331
Corporate Governance on Pg. 258



BOOTS ON GROUND Safety briefing by Regional Head

Social – customer delight

Strengthening customer relations: seamless service and engagement

At ATGL, we focus on delivering true 'Consumer Delight' by prioritising seamless gas supply and continuous engagement. We embrace both digital innovation and direct engagement to elevate the customer experience. By combining targeted digital outreach with proactive on-ground campaigns, ATGL has successfully expanded its customer base while delivering exceptional service to its customers.

Key Linkages

SDGs



Material Topics



Capitals



Associated Risks



Strategic Priorities



Key Performance Highlights for FY 2024-25

9.63 lakhs Consumers

▲ 1.43 lakhs from FY 2023-24

₹ 4.47 crore Spent on customer delight initiatives

100% Consumers onboarded digitally

98% Digital revenue received in all consumer transactions



Customer interaction through KIOSK at Customer Care Centre, Ahmedabad

Customer Satisfaction

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	Target for FY 2025-26
Customer satisfaction percentage	80	85	73	82*	85
Percentage of customers covered through engagement survey	0.38	0.13	0.23	0.11*	0.15

*internal CSAT survey carried out

Customer Focus Areas

- Ensuring 24x7 continuous safe supply of gas
- Ensuring highest safety standards
- Continuous customer feedback and improvement
- Digitalisation for enhanced customer experience
- Timebound grievance redressal and after sales services

Customer Value Proposition

- Faster gas delivery
- Multi-fuel solutions via CNG outlets
- Moderating gas price fluctuations in volatile markets
- Advocating responsible gas pricing with government stakeholders

Multi-channel Engagement throughout Consumer Lifecycle

- Emails, online surveys, including customer satisfaction survey
- Online grievance and feedback mechanism
- Customer meets, reports and brochures
- Website, AdaniGas Mobile App and social media platforms
- Customer delight centres & 24x7 call centre
- Promotional and digital campaigns

Digital Innovation to Elevate Consumer Experience

ATGL enhances customer experience through multiple digital initiatives, prioritising customer satisfaction, operational excellence, and making services seamless, accessible, and customer-centric.

Seamless Service Digitalisation

- Achieved 100% online name transfer and digital registration for DPNG (Domestic Piped Natural Gas) services
- 98% digital revenue collection from payments via various online channels

Customer Convenience Initiatives

- Launch of a cloud-based SAP-integrated IVRS to streamline customer interactions
- 62% of tickets managed via digital platforms such as the app, website, and IVRS
- 59% emergency calls and 30% of total calls handled through IVRS

Enhanced Self-Service Capabilities

- Introduction of self-service kiosks, with 19% utilisation
- 11% of customers now utilise self-billing for DPNG services

Customer Journey Enrichment

- MCMP (My Customer My Pride 2.0) and Customer Coach 2.0 Programmes to strengthen relationships by amplifying customer engagement
- "PPA - My AdaniGas Mobile App" simplifies customer journeys and boosts digital service adoption, with 307K app downloads in FY 2024-25

Effective Communication and Automation

- Email automation and AI-based chatbot systems delivering prompt information and resolutions to customers

Efficient Refund and Request Handling

- 85% of refunds processed via mobile app, reflecting the success of digitisation efforts
- 43% of service requests registered digitally, enhancing operational efficiency

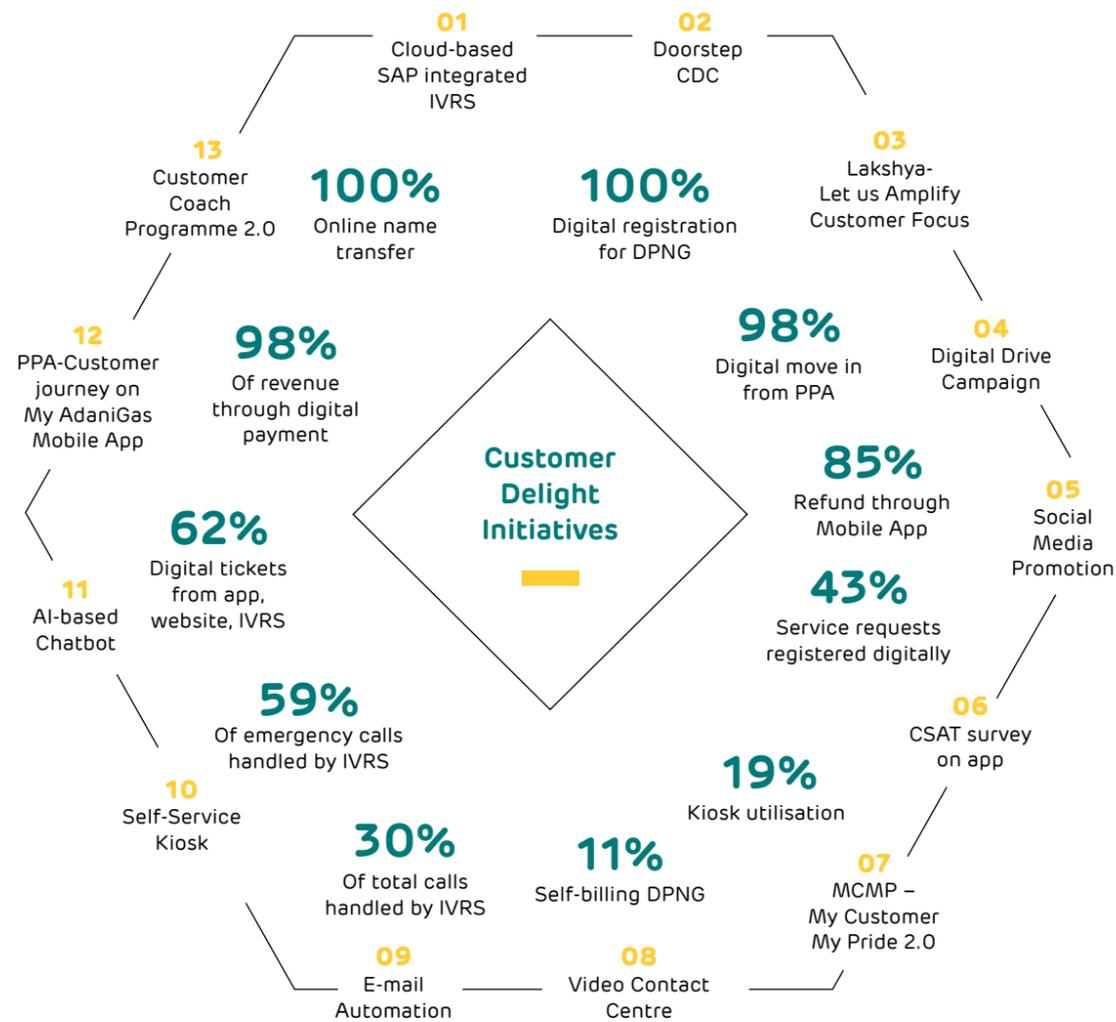
Marketing and Community Engagement

- Digital Drive Campaigns at high footfall locations and social media promotions via influencer along with the webinar sessions covering important topics such as:
 - Safety precautions for PNG usage
 - Advantages of switching to PNG
 - Available discount schemes and offers
- Digital marketing through collaboration with society visitor apps by publishing advertising to generate new leads of DPNG connections



Reaching to Customer Doorstep

Digital Touchpoints - Growing Digital Tree of ATGL



CASE STUDY

Digital Campaigns through Society Visitor Approval Platforms

Initiative

- Collaborations with popular society visitor approval apps like My Gate and No Broker Hood for targeted customer outreach
- Launched digital campaigns at residential societies in East and West Ahmedabad zones

Implementation

- Strategic placement of promotional material at society's key entry points, including lifts and gates
- Visual campaigns showcased ATGL's DPNG offerings to drive interest and generate leads

Impact

- Increased visibility in residential clusters, effectively targeting high-potential audience for new DPNG connections

CASE STUDY

Launch of Doorstep CDC (Customer Delight Campaign)

Objective

Deliver on-site customer experience, generate new DPNG leads, and ensure doorstep customer service

Execution

- A dedicated mobile van with ATGL branding was deployed to visit residential societies
- Notifications about the visit schedule were sent via WhatsApp, ensuring customers were informed in advance

Activities

- Lead generation for DPNG connections
- Resolution of customer queries
- Promotion of ATGL's digital service platforms

Outcomes

- Strengthened ATGL's footprint in key residential areas
- Enhanced customer satisfaction with personalised service delivery and real-time resolution of service issues



Ensuring Timely Access to Gas for Our Consumers

Managing Uninterrupted Gas Supply

- Resilient structure for consistent gas supply
- Strong contract-based ties with key suppliers

Managing Gas Demand through Key Partnerships

- Contracts with Gas Authority of India Limited and Indraprastha Gas Limited for allocation and delivery of Administered Pricing Mechanism (APM) Gas, in compliance with the guidelines from Ministry of Petroleum and Natural Gas (MoPNG)
- Contract as well as spot-basis purchase of RLNG from diverse sources, for consumers in the non-priority segment comprising commercial and industrial PNG sectors
- Procurement of natural gas through agreements with Bharat Petroleum, Exploration (Alpha) Limited and Reliance Industries Limited

- Short and medium-term RLNG contracts with Gas Authority of India Limited and Gujarat State Petroleum Corporation Limited, having price linkages with Henry Hub and Japanese Crude Cocktail, for diversification and cost-optimisation
- Gas supply and purchase agreements of intent for the RLNG procurement or domestically produced gas for consumers in the non-priority segment

Managing Volatility in Gas Prices

- Short and medium-term contracts to moderate the impact of purchase price fluctuations in spot contracts
- Alternative strategies such as hedging, to manage gas costs and shield cashflows from RLNG spot price volatility

Read more under BRSR-Principle 9 on Pg. 345

Commencement of ATEL Contact Centre Operations

ATGL CD Team on momentous occasion of Shri Pranav Adani Ji's birthday i.e. August 9, 2024, commenced ATEL contact centre operations. Overseeing 24x7 call centre support for ATEL customers.



Video Contact Centre ("Seamless Interaction, No matter the distance")

Adani Total Gas (ATGL) aims to enhance customer interaction by allowing customers to connect or schedule virtual meetings with our customer care team, providing them with an additional channel to resolve their queries. We have identified a growing need for more personalised and convenient customer support options. Implementation of a video contact centre to improve the overall customer experience. This will reduce the customers waiting at our customer delight offices and empowered customers to solve their queries from their home only. Further reducing the carbon footprint due to vehicle emissions by ~59 MT, significantly contributing to our sustainability goals.

Customer Coach Programme 2.0

As part of our continuous efforts to enhance customer awareness and engagement, ATGL launched the Customer Coach Programme 2.0 in 2024. This initiative aims to educate customers about Piped Natural Gas (PNG) services, safety guidelines, and the benefits of adopting digital solutions for seamless gas service management.

Key Objectives

- Educate customers about PNG services, including installation, safety, and benefits
- Promote digital adoption through the My AdaniGas application and online platforms
- Generate new Domestic PNG (DPNG) leads by engaging with potential customers
- Encourage participation in webinars by providing valuable insights and exclusive discount schemes

Programme Highlights

- The Customer Coach Programme 2.0 was executed through physical events and online engagement, ensuring a broad reach and impact

1. Live Demonstrations

- Mock setups were created at event venues to demonstrate PNG services and showcase the ease of use and safety features

2. Digital Platform Promotion

- Customers were introduced to the My AdaniGas application, enabling them to manage their services online, access bills, and raise service requests conveniently

3. Webinar Registration & Lead Generation

- Customers were encouraged to register for webinars, where they could learn about safety guidelines, benefits of PNG, and discount schemes
- The programme also focussed on generating new DPNG connection leads through interactive engagement

4. Webinar Content & Awareness Drive

The webinar sessions covered important topics such as:

- Safety precautions for PNG usage
- Advantages of switching to PNG
- Available discount schemes and offers

5. Customer Rewards & Engagement

- As part of the engagement initiative, gift distributions were organised for lucky customers who attended the webinar sessions

- Additionally, the programme was extensively promoted through social media and community outreach to maximise participation

Event & Webinar Schedule

- Physical Events: June, July, August 2024
- Webinar Sessions: August 2024



Digital Drive Programme

Social – occupational health and safety

Safety first in everything we do

ATGL envisions a Zero Harm Health, Safety, and Environment (HSE) Incident culture, making workplaces safer and healthier for its employees, workers and contractors. Our HSE policies and practices emphasise robust risk management, timely incident reporting and investigations, and capacity building, ensuring compliance with all applicable external reporting requirements.

Key Linkages

SDGs



Material Topics

M11

Capitals



Associated Risks

R1 R7 R8

Strategic Priorities

S4

Key Performance Highlights for FY 2024-25

0.50
Lost Time Injury Frequency Rate (LTIFR)

Zero
Work-related fatality

Zero
Cases of occupational illnesses

0.58
Total Recordable Case Frequency Rate (TRC FR)

Focus Areas

- Zero Harm
- Zero Tolerance on Violation of Life Safety Saving Rules
- Proactive Risk Management and Reporting
- Safety Technology Integration
- Regulatory Compliance
- Recognising and Encouraging Safety Behaviour



ATGL's HSE Landscape



Integrated Health & Safety Management System

We have established comprehensive Quality, Health, Safety & Environment (QHSE) policy and management systems, 100% employees and contractors at ATGL. The policy has been approved by our CEO and integrates QHSE in all aspects of our business operations and ensure compliance with applicable legislation & other requirements. The policy also promotes consultation & participation from workers & worker representative in decision-making,

whenever required. Our integrated management system (IMS) are certified with ISO 9001:2015 (Quality Management System), ISO 14001:2015 (Environmental Management System) and ISO 45001:2018 (Occupational Health and Safety Management system). We also have been certified by Petroleum and Explosives Safety Organisation ("PESO") & Petroleum & Natural Gas Regulatory Board (PNGRB) for all our assets.

Regular HSE audits and assurance are conducted both internally and with third-party support, assessing compliance with PNGRB Regulations, workplace safety standards, asset integrity & contractor safety.

We regularly train our employees and contractors on critical HSE procedures to nurture safety behaviour, driving our commitment towards a Zero Harm workplace.

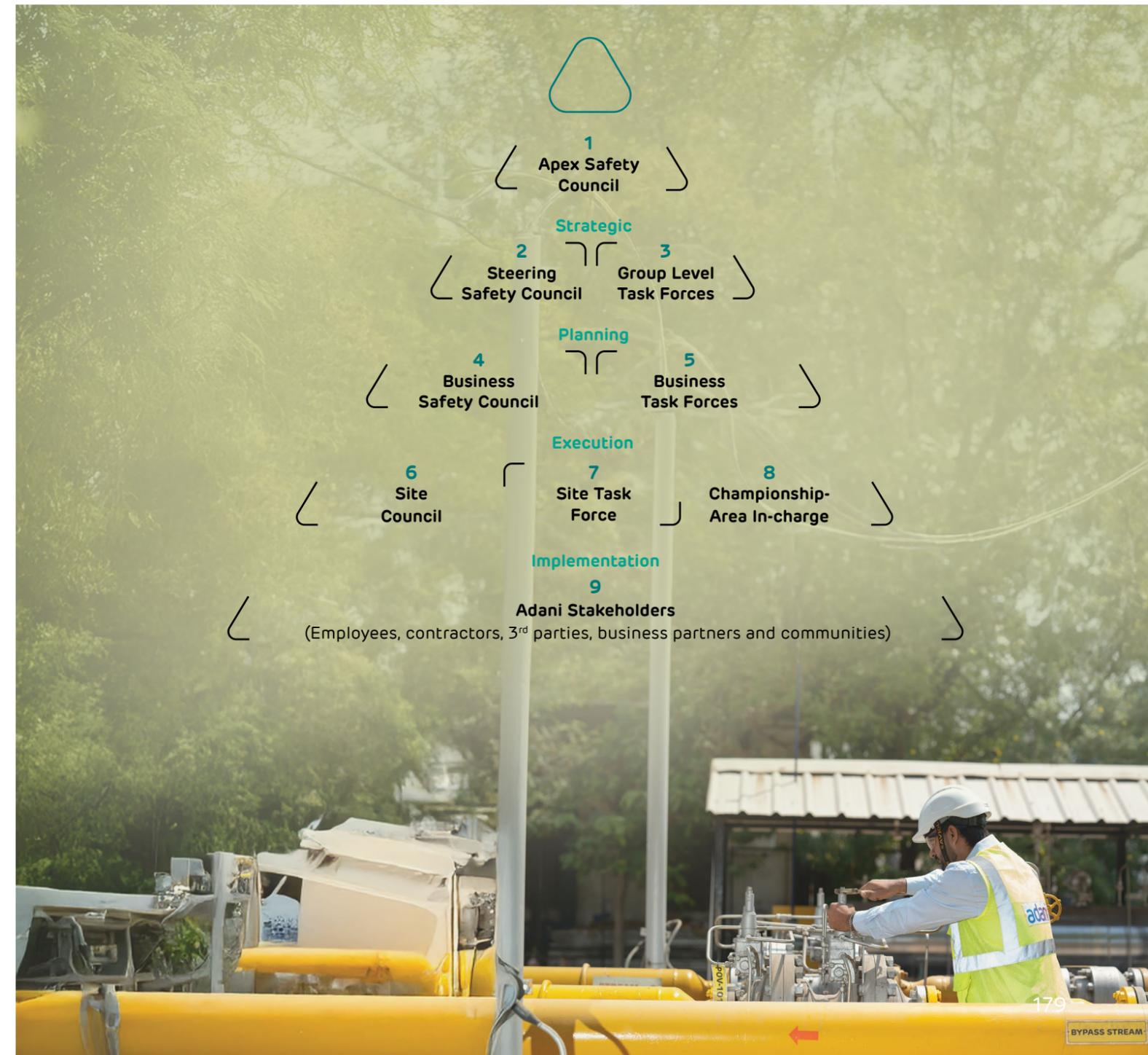
Access our QHSE Policy

Read more about our Health and Safety practices on our website from [here](#)

HSE Governance

Our multi-tier HSE governance model adopts a top-down approach, with the Board and the Board-led Corporate Responsibility Committee (CRC) providing strategic guidance and oversight to the implementation of HSE policies and Management System.

Business Safety Committees and five taskforces operate under the Board's and CRC's supervision, driving execution and compliance. These committees and taskforces, guided by dedicated HSE charters and KPIs, conduct bi-monthly reviews of the safety management system to ensure continuous improvement. The clearly defined roles and responsibilities ensure accountability at each level.



Hazard Identification and Risk Management

We have adopted a framework aligned with globally recognised high level Safety Intervention and Risk Assessment programmes:

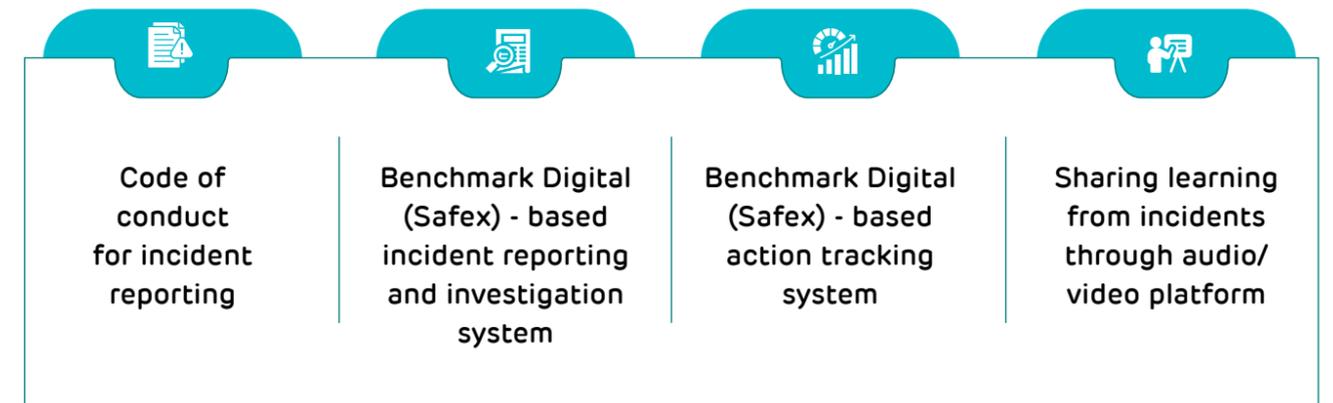
HAZOP	<p>Hazard and Operability Study (HAZOP) A systematic and structured technique to identify potential hazards and operability issues in processes, focussing on deviations from design intentions and their possible consequences. A multidisciplinary team reviews process diagrams to ensure safety and efficiency.</p>
VSR	<p>Vulnerability Safety Risks (VSR) Assessment of potential safety risks and vulnerabilities could affect system or operation, and identification of weaknesses that could be exploited or lead to failures. This process enables implementing proactive measures to mitigate risks and enhances overall safety.</p>
SRFA	<p>Site Risk Field Audits (SRFA) On-site evaluations are conducted to identify and assess potential risks and hazards in the workplace, ensuring compliance with safety regulations and standards for the tasks performed by our Business Partners. These audits involve comprehensive inspections and reviews of safety practices, equipment, and procedures.</p>
QRA	<p>Quantitative Risk Assessment (QRA) A methodical approach using numerical data and statistical techniques to evaluate the likelihood and impact of hazardous events, providing a quantitative insight for decision-making regarding risk management and mitigation strategies.</p>
PSSR	<p>Pre-Startup Safety Review (PSSR) A comprehensive safety review is conducted before the commencement of new or modified facilities to ensure all safety systems are in place and operational. This review verifies that equipment, procedures, and personnel are prepared to operate safely.</p>

Competency and Capability Building

ATGL has established a structured training and competency development plan for employees and business partners based on training needs identification (TNI). The Company organised mandatory trainings on safety induction, STOC (Safety, Technical & Operational Competency) and defensive driving for employees and business partners. Additionally, risk-based & TNI-based programmes are organised for different skill groups.

Incident Reporting & Investigation

We follow a well-structured incident reporting and investigation mechanism to maintain a strong safety culture. All incidents are duly investigated to understand the root causes. Appropriate mitigation plans are developed and implemented as per the hierarchy of controls. We believe in extracting valuable insights from all incidents and sharing the learnings with our employees to prevent any future occurrences. We have deployed a system of Critical Vulnerable Factors (CVF) through which corrective actions arising out of any incidents is deployed horizontally across all locations.



Protection Against Hazards and Reprisals

<ul style="list-style-type: none"> Employees and workers are encouraged to report hazards through ATGL's online reporting portal (Gensuite) that also maintains anonymity 	<ul style="list-style-type: none"> ATGL is committed to supporting an effective QHSE management system 	<ul style="list-style-type: none"> Management promotes a culture that supports the intended outcomes of the QHSE management system through the involvement and participation of all workers 	<ul style="list-style-type: none"> A safety committee is established to protect workers from reprisals when reporting incidents, hazards, risks, and opportunities
<ul style="list-style-type: none"> The GA Head and HSE Head ensure that a procedure for consultation and participation of workers is established and implemented 	<ul style="list-style-type: none"> The Director and GA Head support the establishment and functioning of health and safety committees 	<ul style="list-style-type: none"> The GA Head is responsible and accountable for preventing work-related injuries and ill health, as well as providing safe and healthy workplaces and activities 	<ul style="list-style-type: none"> ATGL promotes improvement through training, appreciation, and reward & recognition

Worker Participation, Consultation, and Communication

Workers' Participation and Consultation

- Suggestions from all employees is sought through Suggestion Scheme, HSE Talks/Meetings on continuous basis
- Employees are consulted in identification and assessment of OHS hazards, environmental aspects, and finalising HSE policies, programmes, operational control procedures and change management, while conducting HSE audits
- Employees participate in safety committee and share their concerns with respect to HSE

HSE Communication with Workers and External Partners

- The employees and business partners are communicated about the job-related hazards and through HIRA & JSA
- Internal communication is facilitated through QHSE policy display at prominent places, training programmes, HSE alerts and monthly HSE scorecards
- External communication with interested parties is managed by the concerned HODs/Asset Heads as relevant and required
- Legal compliances and periodic reports are shared with statutory authorities, as required
- QHSE performance updates are shared through our website

Managing OHS Impacts in Business Relationships

Ensuring Supply Chain Safety

We have established a comprehensive safety programme for supply chain that involves a stringent evaluation process from pre-qualification to post-contract assessment and recognition of the partners who uphold high safety standards.

Key Aspects of Our Supply Chain Safety Programme

- Due diligence during new partner onboarding
- Categorisation of partners into Red, Orange, Green & Purple Cap based on their scores, continuous training and awareness initiatives
- Annual third-party assessments under the 'ATGL Green Cap Programme'
- Partner roadmaps to enhance safety standards
- Performance-based incentives to recognise exceptional safety practices in the supply chain

CASE STUDY

Samarthan 4.0: Enhancing Supply Chain Safety Standards

The Samarthan 4.0 is our flagship initiative designed to promote, recognise, and reward safety practices within the supply chain. This collaborative and participative approach aims to build a safer and more resilient supply chain ecosystem. The programme evaluates and enhances our business partners' practices across various health and safety attributes, fostering a 'Zero Harm' culture throughout the value chain.

100+

Contractors were assessed in FY 2024-25

CASE STUDY

Logistic Control Centre (L.C.C): Enhancing Safety and Efficiency

Background

ATGL's state-of-the-art centralised Logistic Control Centre (L.C.C) is designed to efficiently track and monitor the Company's transport fleet, ensuring strict compliance with both company regulations and traffic laws. By employing real-time interjection and vehicle monitoring, the L.C.C ensures that all vehicles adhere to the permissible speed limit of 60 km/hr, guaranteeing safe and timely arrivals at their designated destinations.

Benefits

- Prevents potential gas leaks and fires in the event of an accident
- Mitigates environmental contamination and safeguards the surrounding population
- Minimises asset loss, ensuring safe and secure transportation of goods

Safety Measures and Awareness

ATGL has defined procedures for safety and technical competency training to ensure workforce competence and evaluate the effectiveness of the implemented actions. Each Process Owner and Management/HR Function determine the required competencies for site personnel, including workers performing work under its control, whose tasks affect or can affect the QHSE performance, regulatory compliance and effectiveness of the QHSE management system. The GA Head ensures that all site personnel, including workers, are competent in carrying out the tasks safely and identifying hazards through appropriate education, training, or experience on critical HSE procedures. The HSE department imparts Safety and Environment-related training to all employees and contractors employees.

51,738

Manhours of safety training conducted

Safety Engagement

ATGL engages personnel through induction, internal and external trainings, meetings and communication about organisation's vision and mission. ATGL supports personnel by understanding their needs and expectations in maintaining the effectiveness of the QHSE management system.

Samarthan 4.0 purple cap programme for contractors

Road safety week campaigns

PNGRB internal audits across various GAs

Self-assessment for contract workers using safety assessment checklist

Felt leadership from leaders by engaging site team through 'Suraksha Samwaad' – safety interaction process



L-CNG Plant, Lunawada, Gujarat

Digitising Safety

Various digital initiatives were taken during the year to enhance safety behaviour, such as SSY mobile application, PTW mobile application and DMS for hazardous goods vehicles.

<p>Site Supervision Year (SSY) Mobile Application</p> <p>Developed to encourage more boots on ground and monitor employees site visits for enhancing HSE practices.</p>	<p>Permit to Work (PTW) Mobile Application</p> <p>Designed to monitor compliance with permit-to-work procedures and enhance focus on high-risk jobs.</p>	<p>Driver Management System (DMS)</p> <p>AI-based Video Cameras are installed in our cascade vehicles carrying hazardous gas to improve driver behaviour towards safety.</p>
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Occupational Health Services

ATGL leverages Occupation Health Services offered by the Group's Occupation Health department, including medical consultation, health tips and periodic wellness programmes for the employees.

Worker's Access to Non-Occupational Health Services

- Life insurance and compensatory packages to permanent employees and workers in the event of death
- Periodic health checkups
- Access to healthcare services through online platform, such as telemedicine consultation, yoga

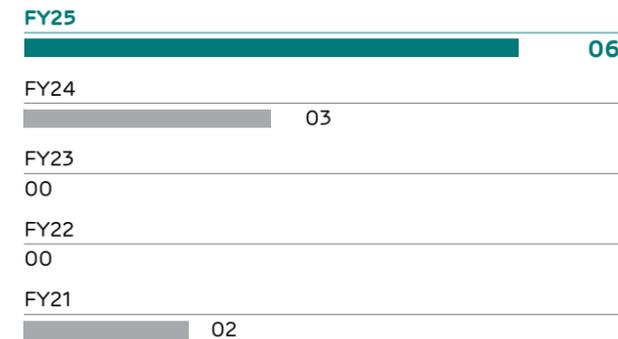
Ensuring Safety and Integrity of Our Assets

Call Before u Dig (CBuD) helpline urging people to call us before initiating excavation activity, to prevent any fire, gas leaks and damages to the underground utilities.

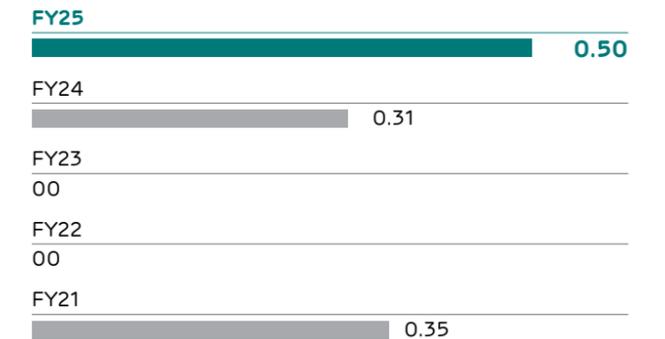
Indradhanush Programme launched in May 2023, evaluates GA-wide asset performance using industry KPIs and formulating improvement plans based on asset health.

Health & Safety Performance in FY 2024-25

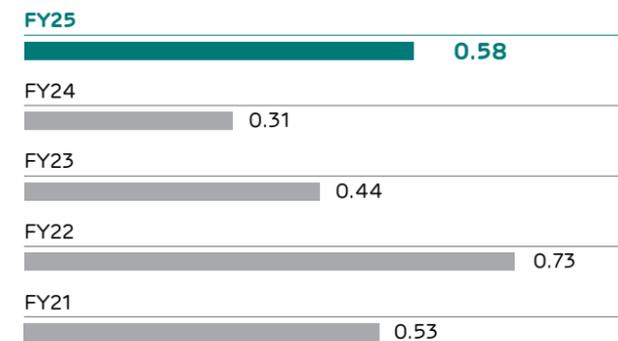
LTI (Lost Time Injury) Cases



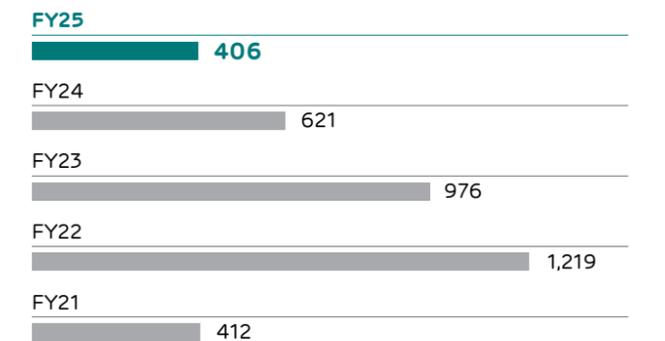
LTIFR (Lost Time Injury Frequency Rate)



TRC FR (Total Recordable Case Frequency Rate)



Near Miss + High Potential Near Miss (Numbers Reported)



Notes:

The data is inclusive of employees, workers and contract workforce.

LTIFR calculation: (Total LTI*1,000,000)/Total Manhours at ATGL

TRC FR calculation: (Total Recordable cases*1,000,000)/Total Manhours at ATGL

There were no work-related ill health hazards that occurred on the ATGL sites during FY 2024-25

[Read more under BRSR-Principle 3 on Pg. 322](#)

Social – corporate social responsibility

Creating value beyond business

Aligning with the Adani Group's 'Growth with Goodness' philosophy, we are committed to involving local communities in our growth journey. Through impactful initiatives, we strive to make a meaningful difference, contributing to a brighter and more inclusive future for all.

CSR Vision

Improve quality of life for all our communities through integrated and sustainable development.

Key Linkages

SDGs



Material Topics

M2 M9 M19

Capitals



Associated Risks

R1 R8

Strategic Priorities

S4 S5

Key Performance Highlights for FY 2024-25

1,42,964
CSR beneficiaries across 08 states

04
NGO partners

23,046
Women beneficiaries

100%
Students from economically weaker backgrounds received free education through Adani Vidya Mandir, Ahmedabad



CSR Expenditure

Total CSR Spend	(in ₹ lakhs)
FY25	1,550
FY24	1,355
FY23	1,245



No Fees ! No Limits !
It was said that they were born with fewer chances. But they studied harder and dreamed bigger!

Gautam Adani
Chairman and Founder of the Adani Group



Adani Vidya Mandir, Ahmedabad

CSR Approach

We implement our CSR initiatives through the Adani Foundation, the social welfare and development arm of the Adani Group, established in 1996. Currently, the Adani Foundation is operating in 6,769 villages across 19 states, transforming 9.1 million lives. The community development strategies of the Foundation are aligned with national priorities and Sustainable Development Goals (SDGs).

Read more about the Adani Foundation here

CSR Governance and Monitoring

All our CSR projects are implemented in alignment with the [CSR Policy](#), which guides our CSR efforts.

Corporate Responsibility Committee (CRC)

The CRC Committee constituted by Board determines the CSR spending, identifies CSR activities, and oversees its implementation in accordance with CSR policy, and the provisions of the Act and CSR Rules, as amended from time to time.

Business Unit Head and Site CSR Head

Support the CSR Committee in executing CSR plans and initiatives at the business unit level through continuous monitoring and regular updates.

Stakeholder Consultation and Engagement in Project Planning and Implementation



Stakeholder Consultation

- Identify and consult with key stakeholders such as local community members, NGOs, government officials
- Gather and document their feedback, concerns and expectations



Need Assessment

- Conduct participatory need assessment with rural communities, identifying and prioritising their needs



Programme Planning and Resource Allocation

- Develop detailed programme plan catering to the community needs
- Outline activities, milestones, timelines and responsible parties
- Allocate budget and manpower for project execution
- Incorporate feedback from affected communities into operational and project decision-making



Project Implementation

- Execute project in partnership with stakeholders adhering to the project plan
- Keep communities informed of the progress, seeking their inputs



Monitoring and Impact Assessment

- Closely monitor the project against the timelines
- Conduct impact assessment to evaluate impact on communities
- Seek and deploy feedback from the affected communities to enhance project effectiveness

Read about our Social Impact Assessment in BRSR-Principle 8-E1 on Pg. 343

Supporting Vulnerable Communities

Through the Adani Foundation, we implement key initiatives for socio-economic empowerment of the women community. Our initiatives are also directed towards mainstreaming the specially-abled and helping them lead a life of dignity and self-reliance.

CSR Activities in FY 2024-25

Focus Area – Education



The Adani Foundation aims to transform lives through education, especially for marginalised communities. It builds institutions like Adani Vidya Mandir and Adani Schools, and runs initiatives such as Project Utthan and Udaan, providing inclusive and affordable learning opportunities. The Foundation integrates advanced technologies with state-of-the-art infrastructure and core Indian values.

In addition to operating cost-free and subsidised schools across India, the Foundation runs initiatives such as Project Utthan to enhance learning outcomes in government schools. It also supports digital tools and classrooms at the grassroots level, offering free coaching, evening classes, and scholarships.

Project Udaan aims to inspire youth by organising exposure tours to Adani Group's business sites, giving students firsthand insights into large-scale operations.

Adani Vidya Mandir: A Place to Learn; A Space to Grow

Adani Vidya Mandir (AVM) schools offer a secure and stimulating learning environment, blending modern technology with traditional values. There are four AVM schools in Ahmedabad, Bhadrashwar, Surguja, and Krishnapatnam, providing free quality education. AVM focusses on students from economically disadvantaged backgrounds, enhancing their employability and productivity to contribute to national economic growth.

Adani Vidya Mandir, Ahmedabad (AVMA)

Founded in 2008, AVMA is a co-educational, English medium - CBSE-affiliated school, offering state-of-the-art facilities to students. The school imparts free education from classes IV to XII (Commerce, Humanities, Science) to children from families with an annual income below ₹ 2.5 lakhs. Every year, AVMA witnesses 120 student enrolments from economically backward sections, through a merit-based selection process.

Over the years, AVMA's top-notch education has enabled several children to carve careers in diverse professional fields, transcending socio-economic barriers.

AVMA has become the first school in Ahmedabad to receive NABET accreditation, achieving one of the highest scores at the national level.

Master Meet Koladiya of Class XII (Science) secured 97.2% and ranked second in Ahmedabad, now seeking admission into a Medical College.

AVMA Highlights in FY 2024-25

Education Beyond Barriers

991

Total students
(46% girls)

39.3%

Students from
ST, SC, and OBC
categories

109

Students are
raised by single
mothers

Sports Achievements - BSE Cluster XIII 2024-25

6

National Selections in
BSE Cluster XIII 2024-25

Academic Laurels

83%

School average
in Class X in
FY 2023-24

79.9%

School average
in Class XII in
FY 2023-24

Several Research
Publications by
AVMA
students in
diverse fields

Collaborations

- Partnered with IIT Madras through School Connect Programme
- Partnered with ADOBE & GEMINI for AI training of staff and students
- Collaborated with NIE Singapore for STEM Training (Phase 4 has been conducted); the STEM lesson plans of 4 teachers will be compiled into a book with the assistance of NIE Singapore
- Parents as collaborators for skill development where parents run skill hubs for teaching life skills, such as carpentry/embroidery/stitching/pottery

AVMA - Value Creation Story

Tejasvini Yadav (2019-20) has recently embarked on an illustrious path in the **Indian Navy** as a **Naval Air Operations Officer**.

From an early age, she demonstrated a **passion for learning and an eagerness to excel, attributes** that did not go unnoticed by her teachers at Adani Vidya Mandir.

[Watch this story here](#)



Adani Foundation Vision Care Programme for Students & Truck Drivers

Project Adani Foundation Vision Care educates school children on the importance of vision screening and eyeglasses. In FY 2024-25, 23,234 students were screened with 51.5% being female. 2,198 students were provided with spectacles.

Improving WASH and Sanitation Facilities in School

Many government schools face inadequate sanitation and WASH facilities due to non-functional water connections, safety concerns, and lack of separate drinking water areas. These issues demotivate students and teachers, affecting the learning environment. We implemented programmes to improve sanitation and hygiene infrastructure in schools and provided Behaviour Change Communication (BCC) training to create a child-friendly learning space.

Outcomes

- Improved student health with lesser water-borne diseases
- Increased attendance due to better health and WASH facilities
- Enhanced learning outcomes due to higher student and teacher motivation

Digital Classrooms

Many schools in India lack the infrastructure for digital classrooms. We are emphasising on providing digital classrooms. A digital, or smart, classroom is an interactive learning environment that employs computer technology to deliver education through audio-visual formats. This approach enhances instructional delivery and supports classroom teaching with online resources.

Benefits

- Multisensory Learning:** The use of graphics, multimedia, and audio-visual tools improves comprehension and accommodates various learning styles
- Interactive Learning:** Multimedia tools make lessons engaging, thereby enhancing understanding and information retention
- Access to Resources:** Online content supports research and expands knowledge beyond traditional textbooks
- Streamlined Teaching:** Automation of routine tasks allows educators to focus on instruction, thus improving efficiency and educational effectiveness

6

Schools

2,494

Students

85

Teachers

Focus Area – Community Development



We address community needs by offering both immediate aid and long-term support, especially during crisis such as natural disasters or other emergencies.

Supporting Animal Welfare

During the year, we supported Shri ShyamLaxmi Hospital (Barsana), dedicated to protecting cows from sickness, starvation and slaughter. With our support, the hospital aims to provide modern medical facilities, nutrition and ambulance services to the injured cows. Over 10,000+ cattle were benefited through this service in FY 2024-25.

Rest Facilities for Drivers

Acknowledging the vital role drivers play in our operations, we created comfortable supportive rest facilities at our Tirupur GA, equipped with hygienic drinking water and sanitation facilities. These resting spaces help drivers recover from fatigue of demanding work, enhancing their productivity, focus and road safety. In FY 2024-25, 43 drivers benefited from these amenities.

Mangal Seva Programme

On the auspicious occasion of Mr Jeet Adani's wedding, the Adani Foundation launched Mangal Seva to empower differently abled married women supporting inclusive and sustainable development.

Under this initiative, the Adani Foundation has pledged one-time financial assistance of ₹10 lakhs to 500 married female divyangs. With support from ATGL, seven females from Kheda, Navsari, Vadodara and Surendranagar were provided assistance.

Impact

- Ensuring a future of dignity, security, and stability for beneficiaries
- Strengthening inclusivity and social upliftment through impactful support
- Reinforcing Adani Foundation's commitment to community welfare and equitable growth

Focus Area – Improving Access to Health and Nutrition



Adani Foundation Vision Care Programme: Vision Screening for Drivers

The project raises awareness among the drivers at Adani Gas Stations, including the commercial drivers, allied transport workers and associated communities. It provides free vision screening and eyeglasses for road safety. At present, this project is implemented at eight locations across four states and Delhi-NCR. 2,166 drivers were screened and 875 of them received eyeglasses. 572 women were screened, of which 473 received eyeglasses.

Quality and Affordable Healthcare at Barsana

Over 95,000 OPD consultations, 35,000 dental OPDs and 5,000 medical tests were provided to the communities in Barsana, making quality and affordable healthcare accessible to the underserved.

Focus Area - Climate Action with Community Engagement



Addressing the vulnerabilities of our communities to looming climate-related threats, the Adani Foundation closely engages with them to drive climate action for a sustainable future for all.

Climate Vision for Communities Near Our Areas of Operations

- No barren area
- Sustainable water resources
- Responsible disposal of solid and liquid waste

Climate Action Thrust Areas

- Organised plantation for transforming wastelands
- Promoting sanitation
- Green sources of energy
- Water conservation
- Climate-resilient farming practices

2,70,000

Trees/saplings of native species have been planted by ATGL with local community engagement, till FY 2024-25.

Greenmosphere: Creating Low Carbon Societies

Greenmosphere is our flagship initiative in alignment with our Sustainable Development Goals to mitigate climate change related problems in urban areas with community amenities. The initiative is focussed on fostering low-carbon societies and cultivating green pockets in urban areas through collaborative efforts with communities, employees, consumers, NGOs and green millennials.

Mass Plantation

Increasing fresh sources of oxygen

Influencing Green Millennials

Spreading Green awareness among educational institutions

Reducing Greenhouse Gases

Halting deforestation, boosting afforestation and supporting wetland conservation



CSR Initiative - Vision Care Programme in Government Schools at our GAs

Green Millennials: Instilling Compassion in Students Towards Environment

As part of our Greenmosphere initiative, we have been involving students – the Green Millennials, to amplify its impact and prepare the future generations to co-exist with nature harmoniously.

We educate millennials across schools and colleges through a structured programme focussing on green technology, energy efficiency and resource conservation. The programme empowers them to make environmentally conscious choices for a sustainable living. We will now identify 'Conservation Champions' – the students from past batches with strong interest in energy conservation and engage them through special sessions. These sessions will feature interactive awareness activities, story-telling sessions to share the success stories and challenges, field trips to observe real-life conservation efforts, and experiential learning exercises. The objective is to influence behavioural changes, fostering a commitment towards sustainable living among these young conservation ambassadors.

Motivating Green Millennials

- Teaching Miyawaki plantation technique
- Creating comics for engaging storytelling
- Skits and painting competitions
- Forest walks
- Certificates and memento for participation

Nature Walk: Amplifying Millennial Voices for the Planet

A field trip was organised for the Class V students of AVMA to the Greenmosphere Biodiversity Park, in Ahmedabad, designed using the Miyawaki forest concept. Spanning over 36,200 square metres, the park fosters biodiversity, while also creating a significant environmental impact. The trip enabled students to explore diverse plant species, learn about their roles in reducing CO₂ emissions, and understand sustainability initiatives that support global environmental goals.

Greenmosphere Highlights

18,500+

Students educated under Greenmosphere initiative in FY 2024-25

70

Green Millennial clubs formed across 3 cities - Ahmedabad, Surendranagar and Kheda in Gujarat

12,100

Interactions

1,536 MT

Oxygen generated annually by biodiversity park

3.14 MTCO₂

Annual offset by biodiversity park

Revival of Roots – Enhancing Biodiversity through Tree Plantation

We initiated a forest restoration project spanning 20 hectares of degraded habitats in collaboration with local forest authorities in Kajalgaon, Assam. The strategies employed were effective in halting further degradation and enhancing ecological resilience. These efforts resulted in significant positive changes in biodiversity, including the flourishing of native plant and animal species, the revitalisation of wildlife habitats, and the stabilisation of ecosystems.

We also conducted a tribal livelihood awareness programme in the local language, emphasising environmental conservation, tribal community well-being, and economic stability. Through culturally sensitive communication, they aimed to bridge linguistic barriers, ensuring effective participation and comprehension among indigenous communities, fostering holistic development and sustainable practices for long-term prosperity.

Impact

50,000

Saplings were planted in FY 2024-25 under Revival of Roots

Energy Audit Conservators: Guiding Consumers Towards Energy Efficiency

This programme aims to improve home energy performance by helping consumers adopt energy conservation practices for better comfort, health, and safety. Our certified energy audit conservators, trained at CERC, are empowered to conduct home visits, assess energy consumption patterns, and guide consumers on ways to improve energy efficiency through behavioural changes and low-cost energy improvements.

Consumers are guided to invest in energy-efficient appliances and solar systems, targeting a 15% reduction in energy bills within six months and recovering initial investments in approximately two years. In FY 2024-25, we certified 10 participants as Energy Conservators.

Resolving Community Grievances

We have established formal mechanisms for communities to raise their concerns to us and seek effective remediation. During FY 2024-25, no community grievances were reported.

 Read more about Community Grievance Redressal on BRSR-Principle 8-E3 on Pg. 344



Social – responsible sourcing

Advancing sustainable sourcing practices

Our Sustainable Procurement strategy governs our commitment to ethical and responsible practices throughout our supply chain operations. Comprehensive supplier assessments help us proactively manage Environmental, Social, and Governance (ESG) risks within our supply chain. By adopting a collaborative approach with our value chain partners, we aim to establish a resilient and responsible supply chain, that aligns with our ESG goals and strategies.

Key Linkages

SDGs



Material Topics



Capitals



Associated Risks



Strategic Priorities



Key Performance Highlights for FY 2024-25

814
Total suppliers in FY 2024-25

17
New suppliers added, out of which

05
Were identified as significant Tier 1 suppliers

71
Instances of penalties paid by our suppliers due to violation or non-compliance of regulation, Company Policy, HSE, labour laws or environmental regulations



Focus Areas



Approach Towards Sustainable Sourcing

Suppliers are our key stakeholders in our sustainability journey, and we take a collaborative approach with them to integrate ESG principles into our supply chain operations. We have established a comprehensive Supplier ESG programme, driven by well-defined targets, KPIs and continuous monitoring and tracking of progress. Our Board of Directors is responsible to provide the oversight for the implementation of the Supplier ESG programme. We focus on conducting supplier assessments and capacity building of our suppliers to enhance their ESG performance compliance with Supplier Code of Conduct. The supply chain and HSE – Sustainability team jointly manages the training and education, and HSE assessment criteria to ensure conformance with ATGL's commitments. We encourage and support our suppliers to align their operations with globally recognised standards, including SA8000, ISO 14001, and ISO 45001.

Local Sourcing

100%

% of total procurement budget spent on local suppliers (for significant locations of operations)

Supplier Code of Conduct

Our Supplier Code of Conduct respects the core conventions of the International Labour Organisation (ILO), principles of UN Global Compact and spirit of the United Nations' Universal Declaration of Human Rights and the prevalent industry standards. All our vendors are required to strictly adhere with the Supplier Code of Conduct.



Supplier ESG Programme

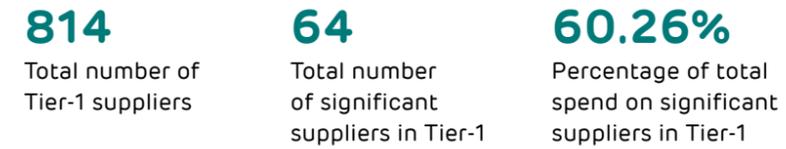
Key Elements of Our Supplier ESG Programme



Critical Supplier Identification

We define our Tier 1 suppliers as those engaged in large-scale significant transactions with our Company. Critical suppliers are identified as those with essential role and high impact on ATGL's operations.

Supplier Mapping FY 2024-25



New Vendor Screening and Onboarding

Our Contractor Safety Management portal and SAP-based Ariba portal facilitate new vendor screening by collecting their ESG and techno-commercial information. Based on this information along with the pre-defined supplier assessment parameters, vendors are assigned a score between 0 - 2. Vendor registration and onboarding is initiated only after they successfully clear the screening process. Prior to awarding the contract, due diligence and evaluation on Contractors Safety Management is carried out thoroughly.



TotalEnergies team visit at Barsana Plant, Uttar Pradesh

Supplier Risk Assessment

Contractor safety management is one of the significant component for suppliers where all the associated partners are annually assessed for safety performance through third-party agency as a part of Samarthan Green Cap Programme. Pre-qualification audit carried out for all the critical suppliers to evaluate them prior onboarding.

Additionally, we conduct thorough supplier due diligence through third-party agencies, covering both new and existing suppliers, with a focus on Tier 1 suppliers. Aligned with our third-party Due Diligence (DD) policy, these assessments help us proactively mitigate potential supply chain risks by assessing country-specific, sector-specific and commodity-specific risks. These evaluations enable us to identify our critical suppliers and assess their compliance with our Supplier Code of Conduct.

Supplier's Code of Conduct Policy

Supplier Engagement and Capacity Building

On an ongoing basis, we engage with the suppliers by developing and supporting the implementation of post-assessment corrective action plans, while actively monitoring their ESG performance. We also conduct mock audits based on the ESG checklist parameters and provide capacity building programmes to enhance supplier familiarisation and performance.

Read more under BRSR-Principle 5 on Pg. 331

Supplier Assessment Parameters



Mitigating Supply Chain Risks

- Procuring critical components or materials from diverse suppliers to reduce dependence on a single source
- Regularly evaluating suppliers' financial stability, reliability, and ESG performance
- Developing contingency plans and alternative sourcing options for critical components in case of disruptions
- Investing in supply chain insurance to cover losses from unforeseen events such as natural disasters or geopolitical conflicts
- Staying informed about legal and regulatory requirements to maintain compliance and minimise disruptions

Supplier Engagement and Development

Aiming to help suppliers enhance their ESG performance and create a safe and secure working environment within their facilities, we train all our suppliers on the Supplier Code of Conduct. We also conduct health and safety awareness sessions and train employees and contractors on HSE risk prevention and emergency procedures. Additionally, we engage with our suppliers through recognition programmes, surveys, and feedback mechanisms to continuously improve our supply chain practices and supplier ESG programme. The objective of supplier engagement is to help them achieve optimal ESG performance and produce high-quality goods and services.

Sampark 2024-25: Celebrating partnership and innovation

The annual "Sampark" Partners meet for FY 2024-25 by ATGL, testifies our commitment to engaging with our partners fostering long-term mutually beneficial ties. The event celebrated the spirit of collaboration, innovation and partnership bringing together our valued vendors from across the country, whose contributions are vital to our success. The agenda featured insights into ATGL's future roadmap, operational goals, growth potential and technology showcase. The meet provided a platform for interactive feedback and knowledge exchange, culminating in a partner recognition ceremony and a networking dinner.

Optimising Contractor Selection Process

Advancing our commitment to continuous improvement, we have strengthened our contractor selection process. We have enhanced our existing contractor selection procedure by formalising the use of Site Registers and performance feedback mechanism through vendor performance scorecard for continued association and engagement.

ATGL's Commitment to MSME Vendors

ATGL deeply values MSME vendors as key partners in its growth trajectory and is fully committed to ensuring their payments are made in compliance with the government guidelines. The necessary steps have been taken to uphold our commitment towards MSME vendors.

Supplier Coverage in Capacity Building Programmes in FY 2024-25

89

Total number of suppliers in capacity-building programmes (Sampark)

24.72

Percentage of significant suppliers in programmes

We have a target of 100% coverage for significant suppliers in capacity-building programmes, which was achieved in FY 2023-24.

Read more about supplier awareness programmes in BRSR-Principle 1-L1 on Pg. 320



Governance

Upholding high standards of corporate governance

We are committed to conducting our business operations with utmost transparency and accountability, fostering trust, financial stability and long-term sustainability. We have established a robust framework of policies, risk management structure and controls to guide our corporate conduct, balancing the Company's growth with stakeholder interests.

Key Linkages

SDGs



Associated Risks



Material Topics



Strategic Priorities



Capitals



Key Highlights for FY 2024-25

ZERO

Incidents of violations of business ethics and code, including corruption and bribery and anti-competitive behaviour

ZERO

Incidents of breach of cybersecurity and data privacy reported by external parties or regulatory authorities

ZERO

Incidents of sexual harassment

100%

Directors and Key Managerial Personnel are trained on Code of Business Ethics and Conduct

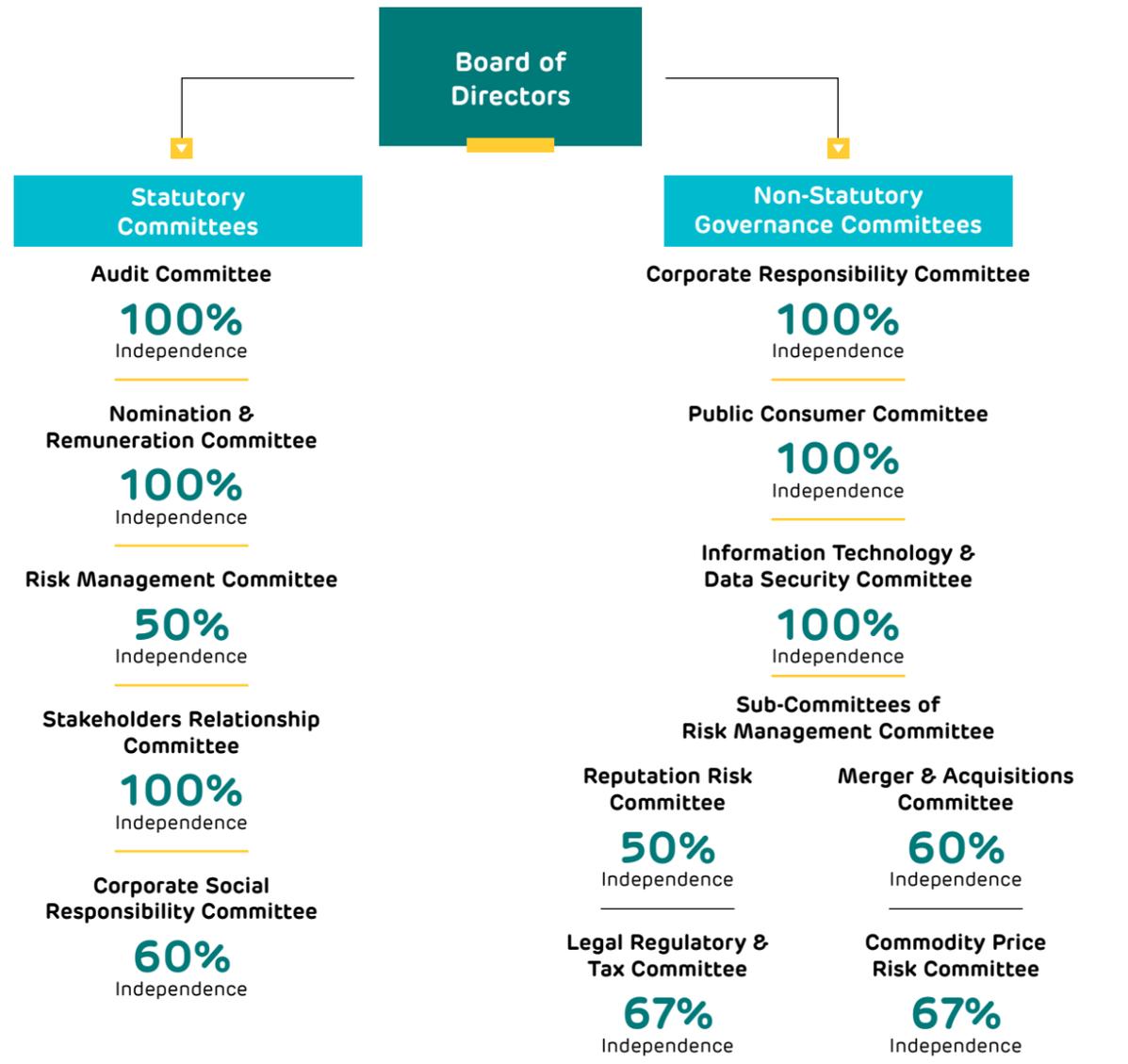
Focus Areas

- Board Composition and Structure
- Transparency and Disclosure
- Risk Management
- Ethics and Integrity
- Compliance and Legal Framework
- Board Effectiveness and Evaluation
- Sustainability and ESG



CGS, Bhadrak

Corporate Governance Structure



Governance Objectives

- Robust risk management/controls
- Implementation of policies & procedures
- Business integrity and regulatory compliance
- Frauds detection & prevention
- Accuracy & completeness of accounting records
- Asset protection
- Continuous monitoring and reporting
- Timely & reliable information to stakeholders
- Enhance ESG ratings

Board Snapshot

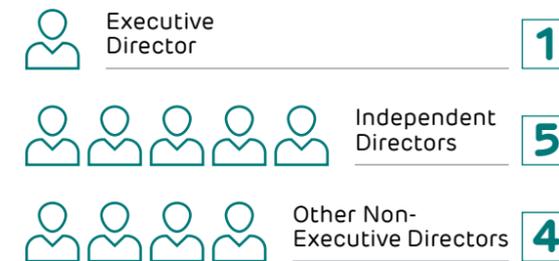
- 50%** Independent Directors on the Board
- 10%** Women Directors
- 3.4 years** Average tenure of Independent Directors
- 61 years** Average age of Board of Directors
- 100%** Directors with > 20 years of experience
- 96%** Statutory and Non-Statutory Committees chaired by Independent Directors
- 5** Board meetings held during the year with **92%** average attendance (minimum requirement: **40%**)

Size and Composition

The Board's composition complies with the guidelines outlined in the Companies Act, 2013, the SEBI Listing Regulations, and other applicable statutory requirements.

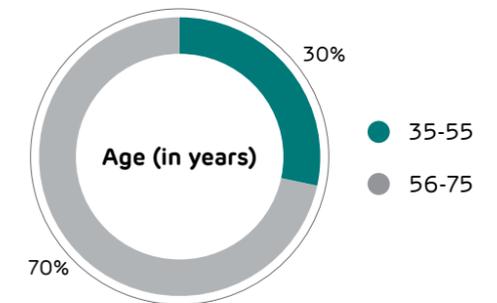
The Company's Board is well-balanced with an optimal mix of Executive and Non-Executive Directors with diverse skills, knowledge and experience. As of March 31, 2025, there are total 10 Directors on the Board including 1 Independent Woman Director.

Number of Directors



10 Total Board size

Board's Age Profile



Read more in the Corporate Governance Report on Pg. 258



Board's Structure

The Company follows a one-tier Board system, with the Board of Directors at the helm of the corporate governance. Board has formally approved the constitution of statutory and non-statutory committees, with dedicated role and responsibilities to handle specific business functions. The Board is committed to conducting Company's business operations based on the tenets of courage, trust and commitment, upholding the highest standards of ethics and integrity.

The Chair of the highest governance body is distinct from the senior executive leadership within the organisation.

Board's Role

The Board of Directors is responsible for providing strategic direction, overseeing Company's business strategies, ensuring integrity and accountability, and safeguarding stakeholders' interests. The Board also guides and oversees the execution of Company's business plan to achieve organisational goals ensuring, compliance with legal and statutory requirements.

Role of Board Committees

The specialised statutory and non-statutory committees guide the management in conducting business operations in line with corporate governance and sustainability policies, while ensuring compliance with all the applicable laws and regulations.

Board's Oversight for ESG Impacts

The Company has implemented a robust sustainability governance structure to manage its impact on the economy, climate, environment and people. The Board has entrusted its Corporate Responsibility Committee (CRC), comprising 100% Independent Directors, with the development and implementation of sustainability and social responsibility policies and initiatives. The Committee is also responsible for reviewing ATGL's stakeholder engagement plan, Annual Integrated Report, sustainability-related publications and providing

assurance to the Board on sustainability matters. Please refer to the [CRC Charter](#) available on Company's Website.

The Board meets annually, to review and approve the sustainability strategic plan for the upcoming financial year. This process includes setting ESG targets, finalising environmental and climate-related initiatives, and other financial aspects of the plan, including climate-related investments.

▶ Our climate and ESG governance structure has been explained on **Pg. 129** of this report.

Board Familiarisation and Upskilling

ATGL offers an extensive orientation and ongoing education programme for incoming Board members, to familiarise them with the Adani Group's ethos, ATGL's historical evolution, critical achievements, structural intricacies, business modalities, and operational arenas. Additionally, the programme imparts specialised risk management instructions, enhancing Board's understanding of Company's strategic objectives and risk mitigation frameworks. For more details, visit the [Directors-Familiarisation-Programme](#) on our website. In FY 2024-25, five capacity building and awareness sessions were conducted to enhance the knowledge and skills of our Board.

ESG Upskilling of the Board and Key Management Personnel

For ESG upskilling, we engaged a leading ESG practitioner from one of the largest global law firms, covering the following topics:

- ESG regulatory and policy landscape
- Identification and management of ESG risks and opportunities
- Key ESG trends including legal implications for the companies and its Directors

100%

Board of Directors were trained on ESG topics

Nomination and Selection

The Directors of the Company are appointed/reappointed by the Board based on the recommendation of the Nomination and Remuneration Committee and approval of the shareholders at the General Meeting(s) or through means of Postal Ballot.

▶ Read more under Corporate Governance Report on **Pg. 267**

Board's Remuneration

The compensation of the Board, Key Management Personnel and Senior Management is in line with our [Remuneration Policy](#) and applicable laws, maintaining an optimal remuneration structure, based on the periodic performance review and achievements of the goals. We do not involve external consultants in determining the remuneration for the Board and Key Management Personnel. The remuneration of VPs and above, is discussed in the Nomination and Remuneration Committee, during their joining or increment process. While we offer sign-on bonuses and termination payments, ATGL does not have a Clawback policy.

▶ Read more under Director's Report on **Pg. 242**

Board's Performance Evaluation

Internal Evaluation Process

The Nomination and Remuneration Committee has devised a performance evaluation criterion for the Board, its committees and individual Directors, to facilitate regular self-assessment.

External Evaluation Process

ATGL undertakes an independent external review of the Board's performance annually to strengthen governance protocols. For the fiscal period ending March 31, 2025, the evaluation was independently conducted by Institute of Directors, India, a leading third-party organisation. The evaluation involved comprehensive discussions, effectiveness assessment questionnaire and focussed dialogues, delving into nuanced dynamics of the Board, scrutinising aspects such as Board composition, strategic participation, quality of discourse, leadership efficacy, and overall organisational vitality. The Board subsequently deliberated upon the findings of the review, leading to consensus-driven initiatives to optimise Board's performance.

▶ Read more under Corporate Governance Report on **Pg. 231**



Corporate Ethics and Integrity

Policy Commitments

Our comprehensive framework of policies on corporate governance, environment and social responsibility helps us adopt high standards of governance, while transcending beyond the legal and statutory compliance requirements. These policies are developed internally, reviewed by the Board Committees and

approved by our Board. Its implementation across the business operations is ensured by the ATGLs management. We communicate these policies to our employees through mailers, training and awareness sessions while suppliers and business partners are informed at the time of onboarding and signing business contracts.

 Our corporate governance and ESG policies can be accessed on our website from [here](#)



India Energy Week, New Delhi - 2025

Corporate Governance and ESG Policies

	Stakeholder Coverage	Board-Committee Responsible for Policy Development & Review
ESG Policy		CRC RMC
Climate Change Policy		CRC RMC
Energy Management Policy		CRC RMC
Biodiversity Policy		CRC RMC
Resource Conservation Policy		CRC RMC
Water Stewardship Policy		CRC RMC
Waste Management Policy		CRC RMC
Human Rights Policy		SRC AC
Quality, Health, Safety & Environment Policy		CRC
Corporate Social Responsibility Policy		CRC CSRC
Diversity Equity and Inclusion Policy		CRC
Freedom of Association Policy		SRC AC
Stakeholder Engagement Policy		SRC
Code of Conduct and Supplier Code of Conduct		SRC RMC CRC
Prevention of Sexual Harassment		CRC RMC
Data Privacy		ITDS
Cybersecurity		ITDS
Whistle Blower Policy		AC
Anti-Corruption and Anti-Bribery Policy		CRC AC

 Shareholders and Investors  Customers  Employees  Suppliers  Community  Regulatory Authority and Rating Agencies

Board Committees:

CRC Corporate Responsibility Committee **RMC** Risk Management Committee **AC** Audit Committee
ITDS Information Technology & Data Security Committee **CSRC** Corporate Social Responsibility Committee

Human Rights

Our Human Rights Policy inscribes our commitment towards safeguarding and promoting the human rights of all those associated with us. Our human rights approach is rooted in globally recognised standards and frameworks, with emphasis on conducting human rights due diligence, along with training and awareness initiatives for our employees and business partners.

[Read more Pg. 165](#)

Embedding Policy Commitments

- Established robust climate and ESG governance framework with supervision from the Board and its committees. The Board is supported by the management team in the effective execution of ESG strategies and commitments at the operational level

[Read more Pg. 129](#)

- Linked a part of the compensation of the Board, Key Management Personnel and Sustainability Managers with their performance on climate and sustainability metrics, reinforcing ATGLs broader goals and commitments

[Read more Pg. 140](#)

- Implemented Integrated Management System (IMS) certified on ISO 14001, ISO 9001, ISO 45001, reinforced through regular internal and independent third-party audits

- Embedded human rights requirements into our business contracts and agreements. We also undertake human rights due diligence across our operations, supplier operations and joint ventures, for proactive identification and mitigation of potential risks

[Read more under Employees Pg. 165-167](#)

- Trainings, and awareness initiatives are conducted to communicate policies and procedures to our employees, contractual staff and suppliers, to enhance their adherence with the Code and human rights standards

- Internal and third-party assessments are carried out to evaluate suppliers' adherence with the Supplier Code of Conduct. New vendor requests are meticulously screened on the ESG parameters using desk assessments and on-site visits to qualify as ATGLs suppliers

[Read more 'Responsible Sourcing' Pg. 196](#)

- Formal channels are established for employees and stakeholders to report grievances and any potential breach of code

Code of Conduct

We have formally adopted a [Code of Conduct for all the Board Members and Senior Management Personnel](#), in accordance with SEBI listing regulations on Corporate Governance. The Code also outlines processes to avoid and manage conflicts of interest. For FY 2024-25, all Board members and senior management personnel have affirmed their compliance with the Code and a declaration signed by the CEO available on **page 305** of this report.

Additionally, ATGLs Employee Code of Conduct applies to all employees across the Company and its subsidiaries, ensuring mandatory adherence.

Anti-Corruption and Anti-Bribery

We maintain a zero-tolerance stance towards all forms of corruption and bribery. This commitment is underscored through our [Anti-Corruption and Anti-Bribery Policy](#) across our own and value chain operations. We get the background verification done for all employees and business partners before appointing them. Independent third-party due diligence is carried out for the business partners. Additionally, our JV partner conducts periodic assessment for anti-corruption and anti-bribery, ensuring our zero-tolerance approach towards corruption and bribery.

Training and Communication

- Mandatory fundamental compliance training for all employees, with periodic refreshers
- Compulsory induction sessions for new hires for awareness on ATGLs policies and Code
- Fortnightly mailers to all employees to enhance compliance awareness
- Facilitate employees' access to internal resources for insights on legal, statutory and regulatory requirements

Training on Anti-Corruption Policies

Particulars	Percentage of Individuals Trained
Governance Body Members	100%
Senior Management	100%
Full-time Employees (other than governance bodies and senior management)	100%
Business Partners	100%

Access to Remedy

Whistleblower Mechanism

We have formally implemented a vigil/whistleblower mechanism under our [Whistleblower Policy](#), enabling all employees and Directors to freely report any actual or suspected breach of code and serious irregularities in the system. The policy ensures protection against reprisals or unfair treatment, with the Audit Committee / Vigilance and Ethics Officer overseeing the investigation and taking required actions on the substantiated complaints.

Grievance Mechanism

ATGL provides formal channels to all its employees, workers, suppliers, business partners, communities and other stakeholders to raise their concerns to us and seek effective resolution. We respect their perspectives and integrate their considerations into our decision-making processes.

[Read more under BRSR](#)
 Principle 5 for human rights grievance on **Pg. 331**
 Principle 3 for employees and workers grievance on **Pg. 322**
 Principle 8 on community grievance on **Pg. 343**
 Principle 9 for consumer grievance on **Pg. 345**

Reporting on Breach of Code

Incidents of Breach	Number of Breaches in FY 2024-25
Corruption or Bribery	Nil
Discrimination/Harassment	Nil
Customer Privacy Data	Nil
Conflicts of Interest	Nil

Political Contribution

In FY 2024-25, there were zero political contributions or spending directed towards political campaigns, political organisations, lobbyists or lobbying organisations, trade associations and other tax-exempt groups.

Financial Assistance Received from Government

There was no monetary value of financial assistance received by the Company from any government during the reporting period, including tax reliefs, subsidies, grants, awards, royalty holidays, financial assistance from ECAs, financial incentives or any other financial benefits. There is no presence of government in the shareholding structure of the Company.

Cybersecurity and Data Privacy

Information Security Governance

ATGL has adopted a [Cybersecurity Policy](#) and [Data Privacy Policy](#) to ensure integrity and confidentiality of its cyber and information assets. We have also initiated the process for implementation of ISO 27001 Security Standards

and target to achieve the certification in FY 2025-26.

ATGL's Board is responsible to oversee organisation's preparedness to respond to cyber risks and ensure compliance with applicable statutory and legal requirements.

Information Technology & Data Security Committee (IT&DS)

- Fully independent, three-member Board committee, led by an Independent Director
- Oversees Company's IT resource management and security
- Assists the Board in implementing policies, strategies and initiatives to manage cybersecurity risks to Company's IT infrastructure

Chief Digital Officer (CDO)

- Leads IT and cybersecurity division of the Company
- Implements Board's directives within day-to-day operations through actionable strategies to safeguard enterprise assets and information

Training and Initiatives

- Compulsory online learning module for all employees on cybersecurity and data privacy policies and procedures
- Mandatory training for new hires as part of their induction programme
- 100% partners go through comprehensive cybersecurity and data checks before onboarding, as per ERP & cybersecurity and data policies

100%
Employees trained on cybersecurity and data privacy policy through e-Vidyalaya, in FY 2024-25

Cyber Security and Data Privacy Measures

To respond to the emerging cyber threats effectively and enhance our regulatory compliance, we have implemented several measures, including regular vulnerability assessments, security audits, employee training on best practices, and the adoption of advanced technologies such as encryption and multi-factor authentication.

Measures for Hardening of Systems in the Adani Network

- Multi-factor authentication for end-point system access
- Enterprise Mobility Management (EMM) for secure enterprise application access on mobile devices
- Data leak prevention and monitoring controls
- Restricted access to USBs, public domain emails and file transfer sites
- Regular patch updates for servers and end user systems to address vulnerabilities
- Up-to-date anti-virus protection against viruses and malwares
- Quarterly vulnerability assessments and mitigation for servers
- Routine iOS version upgrades for DC devices
- Firewall hardening for enhanced security

Application Security Measures

- Multi-factor authentication for common applications
- Vulnerability Assessment and Penetration Testing (VAPT) assessments

Measures to Protect PII

- Customer data masking
- Initiated the process for implementation of ISO 27001
- Initiated compliance with Digital Personal Data Protection Act 2025



CGD Representatives visit at ATGL – SOUL, Integrated Digital Platform, Ahmedabad

Board of Directors



Mr Gautam S. Adani

Chairman and Founder of the Adani Group
Non-Executive and Non-Independent Director

Under the visionary leadership of Mr Gautam S. Adani, the Chairman and Founder of the Adani Group, the organisation has positioned itself as a global integrated infrastructure player with interest spanning Resources, Logistics and Energy verticals. Mr Adani's extraordinary journey and experience over 35 years is characterised by his entrepreneurial ambitions, strategic foresight and relentless hard work. His leadership has not only steered the Group to achieve numerous significant milestones but also fostered the development of a robust business model, playing a crucial role in nation building and strengthening India's infrastructure.

Skills and Expertise



Committee Membership/Chairmanship

Nil



Mr Pranav Adani

Non-Executive and Non-Independent Director

Mr Pranav V. Adani has been active in the Group since 1999, playing crucial roles in initiating & developing numerous new business opportunities across various sectors. Notably, he led the Joint Venture with the Wilmar Group of Singapore, transforming it from a single refinery edible oil business into a pan-India food company. He also leads the Group's Oil & Gas, City Gas Distribution & Agri Infrastructure businesses. His keen understanding of the economic landscape has been instrumental in scaling up the Group's businesses multi-fold. He holds a Bachelor of Science in Business Administration from the Boston University, USA. He is also an Alumnus of the Owners/President Management Program of the Harvard Business School, USA. He has been conferred with several awards, including the prestigious Globoil Man of the Year Award 2009.

Skills and Expertise



Committee Membership/Chairmanship

RR CSR RM M&A



Dr Sangkaran Ratnam

Non-Executive and Non-Independent Director

Dr Ratnam read engineering at Cambridge where he completed his PhD in Geotechnical Engineering. He also holds a master's degree in Geo-Environmental Engineering from the Massachusetts Institute of Technology (MIT, USA) and a bachelor's degree in civil engineering (first class) from the Imperial College in London. He has been with TotalEnergies in various international assignments since 2002.

Following an early engineering career outside TotalEnergies, he joined TotalEnergies UK in Aberdeen in a commercial role, before embarking on a 21-year international business career with resident assignments in Africa, the Middle East, Asia Pacific, and Europe. During this period, he held various asset management functions including leading major negotiations, following up challenging E&P assets (exploration, production, LNG mega projects) and managing complex joint venture partnerships and Government relations. He worked on the Angola, Yemen, Ichthys & Gladstone (Australia), Bontang (Indonesia) and Brunei LNG projects in various capacities. Dr Ratnam was based in Paris, France where he was Vice-President, Libya and then Project Director for New Business negotiations for TotalEnergies across the MENA region. Later, he was Business Director for Papua New Guinea responsible for the progress to Final Investment Decision (FID) of the multibillion-dollar Papua LNG project.

Presently, Dr Ratnam is serving as Country Chair for TotalEnergies in India as well as the Chairman and Managing Director of TotalEnergies Gas, Renewables and Power (GRP) branch.

Skills and Expertise



Committee Membership/Chairmanship

CSR RM M&A RR



Mr Thibault Lesueur

Non-Executive and Non-Independent Director

Mr Thibault Lesueur, a French national with a degree in Business Administration, serves as the Chairman & Managing Director of TotalEnergies Marketing India Private Limited and Vice-President, South Asia for the Marketing & Services division of TotalEnergies, based in Mumbai.

With a career spanning 27 years within TotalEnergies, Thibault has held leadership roles across Europe, Africa, and the Middle East. He's managed businesses in diverse sectors including fuel stations, lubricants, LPG, and general trade. He has also served as a Board Director for various TotalEnergies affiliates and joint ventures. Prior to his current position in India, Thibault served as the Managing Director for Lubricants at TotalEnergies Marketing in France, where he pioneered initiatives to build a circular economy for lubricants.

Skills and Expertise



Committee Membership/Chairmanship

Nil



Mr Shashi Shanker

Independent and Non-Executive Director

Mr Shashi Shanker is the former Chairman and Managing Director (CMD) of Oil and Natural Gas Corporation Ltd. (ONGC) – a Fortune 500 company, a premier Maharatna PSU and the flagship National Oil Company. He also served as the Chairman of ONGC group of companies comprising its subsidiaries – ONGC Videsh Limited, MRPL and Joint Ventures - OPaL, OMPL, OTC and MSEZ. He is an industry veteran with more than four decades of experience in diverse Exploration & Production (E&P) activities. He is a Petroleum Engineer from Indian Institute of Technology (ISM), Dhanbad and holds an MBA with specialisation in Finance. He has also received executive education from prestigious institutes like Indian Institute of Management, Lucknow and Indian School of Business, Hyderabad.

Mr Shashi Shanker was President of Global Compact Network India (GCNI), the Indian Local Network of the United Nations Global Compact (UNGC) which has been providing a robust platform for Indian businesses, academic institutions and civil society organisations to embrace the ten principles of Global Compact Network, United Nations. In 2019, the CEOWORLD magazine ranked him 3rd in the Indian CEOs and 77th worldwide, among the most influential Chief Executives. He is also a recipient of distinguished Fellowship of the Institute of Directors (IOD) award in 2019.

Skills and Expertise



Committee Membership/Chairmanship

RM CPR AU SR CSR IT&DS M&A



Mr Shailesh Haribhakti

Independent and Non-Executive Director

Mr Shailesh Haribhakti is a five-decade career Chartered and Cost Accountant, and a Certified Internal Auditor, Financial Planner & Fraud Examiner. He has been conferred with the Global Competent Boards Designation (GCB.D) by Competent Boards Inc. Canada. He has been awarded "Vivekananda Sustainability Award 2022" by Vivekananda Youth Connect Foundation. Presented with the honorary PhD title of "Doctor of Letters" by ITM University.

Mr Haribhakti actively promotes shared value creation and a green environment through his own enterprise, and his leadership roles as Chairman of the CSR / ESG / Sustainability committees of some of the Boards that he serves on. He has successfully established the concept of "Innovate to Zero" and technology enabling CSR / ESG / SUSTAINABILITY which is in alignment with the idea of making the impact of every intervention focussed, widespread, co-operative and far-reaching.

Mr Haribhakti has a passion for teaching, writing and public speaking. He was associated with the Indian Institute of Management (IIMA) as visiting faculty from 1981-83. He frequently contributes his views on public forums, to the press and to the electronic media.

He is Chairman of M/s. Shailesh Haribhakti & Associates, Chartered Accountants Firm and Vice Chairman of GOEVA Consulting Pvt Ltd and also holds Chairmanship & Directorships in various reputed Public & Private companies.

Skills and Expertise



Committee Membership/Chairmanship

AU N&R M&A CSR CRC RR LR&T



Ms Gauri Trivedi
Independent and
Non-Executive Director

Ms Gauri Trivedi holds a master's degree in political science from Jawaharlal Nehru University (JNU), Delhi, and an M. Phil (Soviet Studies), JNU, Delhi. She earned her Doctorate in Philosophy from Institute of Social & Economic Change, Bangalore and Institute of Development Studies, Mysore and completed PGPPM from Indian Institute of Management (IIM), Bangalore.

She has held several administrative posts in Karnataka including Assistant Commissioner, Joint Director (Commerce and Industry), Chief Secretary/Director Rural Development and Panchayati Raj, Deputy Commissioner (Excise), Joint Registrar of Cooperative Societies. She has served as Managing Director of HESCOM, a power distribution company; Managing Director of the Karnataka State Food & Civil Supplies Corporation; Secretary to the Government in the Revenue Department of Karnataka; and Secretary to the Governor of Karnataka. She currently serves on the Board of companies such as Adani Airport Holdings, The Sandesh Group, Nikhil Adhesives and Bhaikaka University.

Skills and Expertise



Committee Membership/Chairmanship



Mr Mukesh Shah
Independent and
Non-Executive Director

Mr Mukesh M. Shah, a Chartered Accountant with an M. Com. LL.B. and FCA as qualifications, is the Founder and Managing Partner of the firm Mukesh M. Shah & Co. and has more than 48 years of experience. Under his leadership, the firm has grown from proprietorship in 1978 to a team of more than 90 professionals operating across India.

He possesses extensive knowledge in diversified fields of Audit & Assurance, Tax & Regulatory matters, Transactions advisory services, Due Diligence, Corporate Restructuring including Mergers, De-mergers, Valuations, Acquisition and Sale, Project Finance, FEMA & Regulatory matters.

He serves as the Trustee of a leading educational institute that operates 5 colleges and imparts education to more than 6,500 students in Ahmedabad. He has also been a committee member of the Chartered Accountants Association, Ahmedabad and ITAT Bar Association, Ahmedabad.

Skills and Expertise



Committee Membership/Chairmanship



Mr Suresh P. Manglani
Executive Director &
Chief Executive Officer

Mr Suresh P. Manglani is an Executive Director & Chief Executive Officer of our Company. His career spans over three decades in the oil and gas industry, including around 17 years in British Gas and BP Plc joint ventures in India, in the area of midstream and downstream (CGD) businesses. He joined our Company as Chief Executive Officer in September 2018. He has previously been associated with GAIL for approximately five years followed by Mahanagar Gas Limited (a joint venture of British Gas (later Shell) and GAIL) for over 13 years. Subsequently, he was associated with Reliance Industries Limited for over 10 years, in the capacity of Senior Leader and Chief Financial Officer for refinery and marketing divisions (retail petroleum business). He has vast experience in handling P&L responsibility, city gas distribution and across the value chain of the gas business, petroleum retail and policy advocacy. He is a passionate professional on driving digitalisation and process transformations in every business he has been entrusted with in his career.

Skills and Expertise



Committee Membership/Chairmanship



Mr Bharat Vasani
Independent and
Non-Executive Director

Mr Bharat Vasani is a seasoned legal professional with over 40 years of experience. He has a rich experience in large corporates and was the Chief Legal & Group General Counsel of the Tata Group for around 17 years and retired from the Group as the Legal Advisor to the Tata Group Chairman. He was also on the Board of several listed and unlisted companies of the Tata Group. He presently also serves as the Public Interest Director on the Board of Central Depository Services (India) Limited and an Independent Director of Phoenix ARC Private Limited.

In his long stint at senior management levels, Mr Vasani has successfully built and managed the in-house legal departments of large multinationals. He has steered several large and significant M&A transactions pursued by the Tata Group, including many successful cross-border deals. He has also successfully negotiated many joint ventures with various multinational conglomerates. Mr Vasani has also extensively advised on complex commercial transactions involving nuanced legal issues on various aspects such as the related party transactions (RPT) regime in India, new CSR regime, schemes of arrangement, M&A, joint ventures, etc. and has also extensively advised on aspects relating to inbound and outbound investments and securities law. Mr Vasani has a vast experience in advising clients on the SEBI LODR Regulations, including the recent amendments notified by SEBI.

Mr Vasani's influence extends beyond corporate practice into public policy, where he is highly regarded in government and industry circles. As the Chairperson of Legal Affairs Committee at the Bombay Chamber of Commerce and Industry, he has actively represented corporate interests before key regulators including the MCA, SEBI and RBI. His commitment to legal education and knowledge sharing is demonstrated through his participation in nearly 250 nationwide seminars, appearances on CNBC, and comprehensive training sessions for Board and Audit Committee members on corporate law and governance matters. He is a keen public speaker and was selected to speak on India's Competition Act at the reputed Chatham House, London. He is a prolific writer and routinely shares his views on various contemporary aspects related to corporate governance, and other corporate law issues on different public fora. He was also a specialist editor of the 19th Edition of A Ramaiya's celebrated commentary on the Companies Act.

Mr Vasani is presently a Senior Advisor – Corporate Laws at a leading law firm, Cyril Amarchand Mangaldas (CAM). In his role at CAM, Mr Vasani has provided nuanced guidance to clients on strengthening their internal compliance, governance frameworks and advised on complex aspects of corporate and securities laws and crisis management. Mr Vasani has also authored more than 100 blogs on a diverse array of topics ranging from company law, SEBI Regulations, FEMA, and corporate governance.

Skills and Expertise



Committee Membership/Chairmanship



Committee

N&R	Nomination & Remuneration Committee	M&A	Mergers & Acquisitions Committee (Sub-Committee to Risk Management Committee)
AU	Audit Committee	LR&T	Legal, Regulatory & Tax Committee (Sub-Committee to Risk Management Committee)
SR	Stakeholders' Relationship Committee	RR	Reputation Risk Committee (Sub-Committee to Risk Management Committee)
CSR	Corporate Social Responsibility Committee	CPR	Commodity Price Risk Committee (Sub-Committee to Risk Management Committee)
RM	Risk Management Committee		
CRC	Corporate Responsibility Committee		
PCC	Public Consumer Committee		
IT&DS	Information Technology & Data Security Committee		

■ Chairman / Chairperson ■ Member

Skills and Expertise

- Business Leadership
- Financial Expertise
- Risk Management
- Global Experience
- Corporate Governance & ESG
- Merger & Acquisition
- Technology & Innovation

Our tax and other contributions

Upholding responsible tax practices

We are committed to fulfilling our tax responsibilities by ensuring full compliance with applicable tax laws across all geographies we operate. Our tax governance framework is designed to maintain transparency, accountability, and adherence to statutory obligations, ensuring value creation for shareholders and sustainable business growth.

Taxes serve as a fundamental source of revenue for the Governments and are crucial in financing both development initiatives and socio-economic programmes. Consequently, taxes present a substantial opportunity for businesses to showcase their equitable contributions to nation-building covering society, public services, infrastructure, economic advancement and social welfare.

We consider tax as a material topic that plays a significant role in making economic and social contributions facilitating achievement of sustainable development goals. This dedication is in harmony with our aspiration to become a global leader in businesses that enhance lives and assist nations in developing infrastructure through the creation of sustainable value. We believe that companies are under an obligation to comply with prevailing tax legislations and the Management owns a

responsibility to the stakeholders to address expectations of good tax practice.

We are committed to fulfilling our tax responsibilities in all jurisdictions where we conduct business. Our approach to taxation and governance is structured to support such objectives and our goal is to consistently meet our tax obligations promptly, aligning with value creation and adhering to the relevant laws in each jurisdiction in which we operate.

As one of the foremost contributors to the exchequers, we acknowledge our duty to operate with integrity and accountability. Our belief is rooted in the creation of sustainable value for all stakeholders over the long term and we seek to affirm our dedication to transparency, build trust among stakeholders and support the establishment of a more accountable global tax framework.

Principles of Our Tax Approach

1. Compliance and Ethics

All taxes and related compliance reports are filed within statutory due dates. We strive to remain fully compliant with applicable tax legislations in the regions and geographies where we operate. We seek expertise from tax advisors wherever necessary and monitor our tax compliance in real time. We fulfil our obligation to pay a fair share of taxes in the jurisdictions where we generate value.

2. Transparency in Disclosures and Reporting

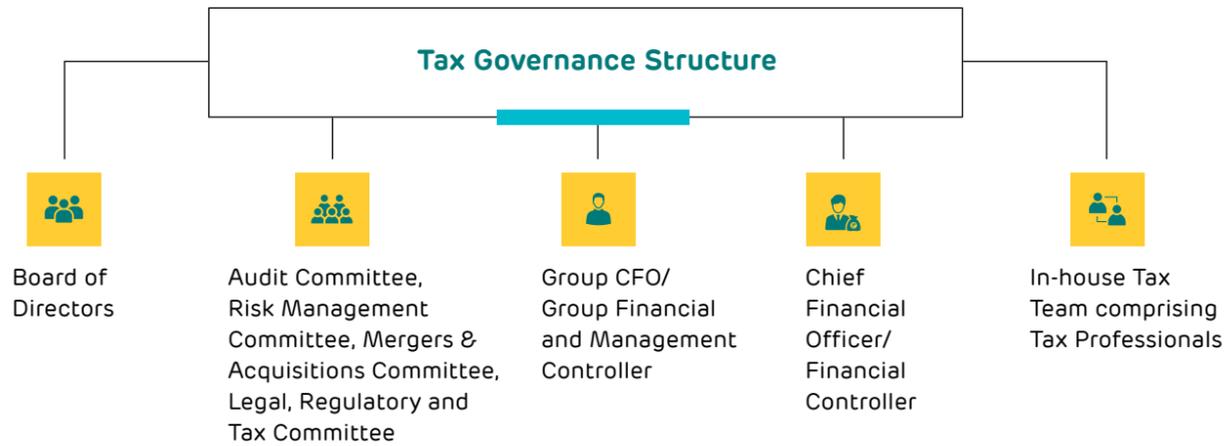
We make comprehensive disclosures on tax practices, payments, and governance processes, transcending merely the statutory requirements to promote trust and transparency with our key stakeholders including government, regulators and Investors.

3. Governance and Oversight

Our Board of Directors, along with the dedicated Tax team, oversees tax governance, closely engaging with the business units. We have established standard operating procedures and internal controls to handle tax-related matters, adhering to best practices and regulatory requirements.

4. Stakeholder Engagement

Our tax team collaborates with governments and industry bodies through participatory dialogues, to help shape and influence tax policies, while ensuring compliance with emerging regulations.



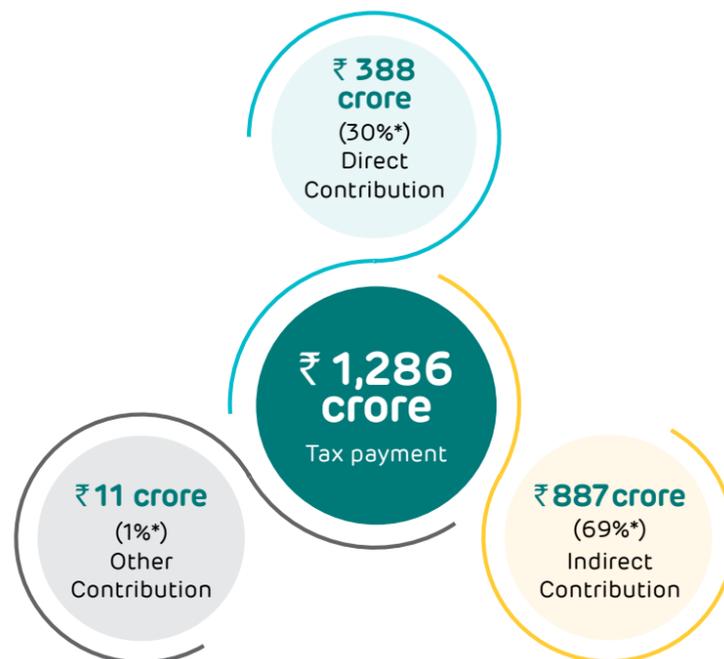
The Board periodically reviews all strategic tax matters in its meetings. Comprehensive due diligence is carried for Mergers and Acquisitions, to effectively manage risks and ensure certainty.

Tax Risk Management Approach

Risk Assessment Continuous tracking and monitoring of changes in tax legislations and policies	Self-Assessment Regular review of controls and governance practices to prevent non-compliances	Resource Management Engage external tax expertise to get clarity on the tax laws, wherever needed	Industry Benchmark Examine industry peers' tax approach to manage tax risks
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Our contribution to the exchequer

ATGL contributed ₹ 1,286 crore in tax payments across direct, indirect and other contribution categories in FY 2024-25.

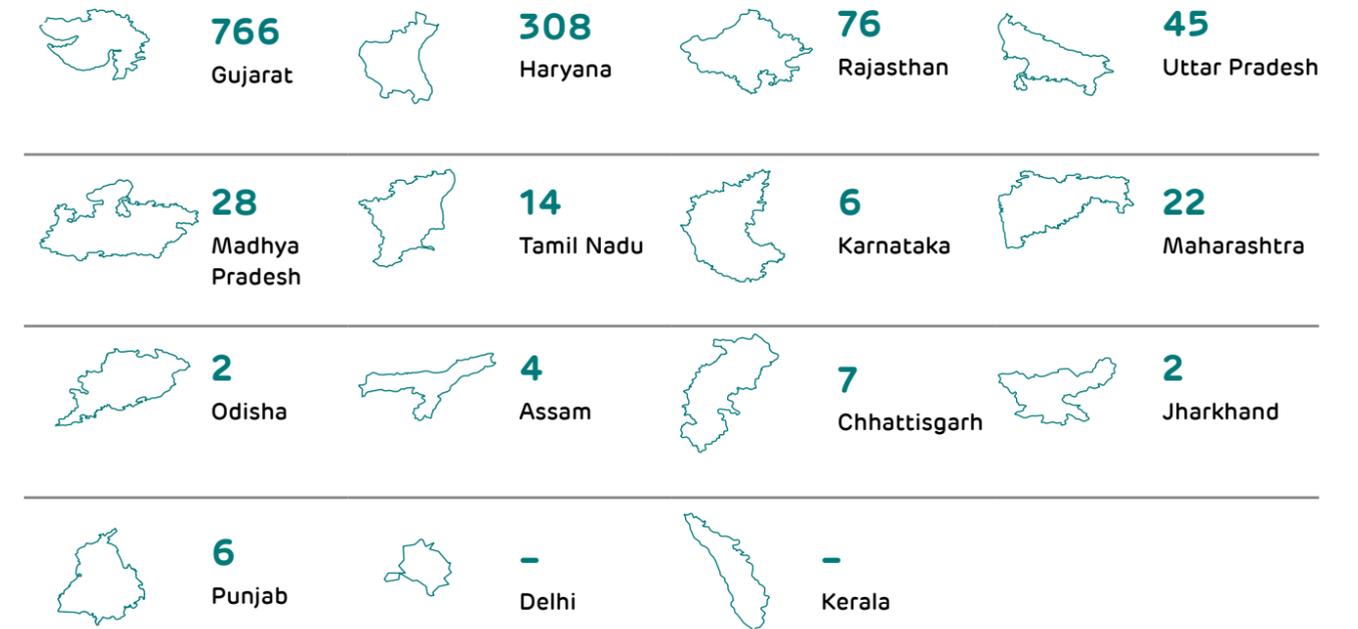


- Payments made by ATGL and its subsidiaries directly to the government in FY 2024-25
- Payments collected by ATGL and subsidiaries on behalf of the Government from other stakeholders in FY 2024-25
- Contributions in the form of social security payments and other statutory obligations in FY 2024-25

*% of total contribution

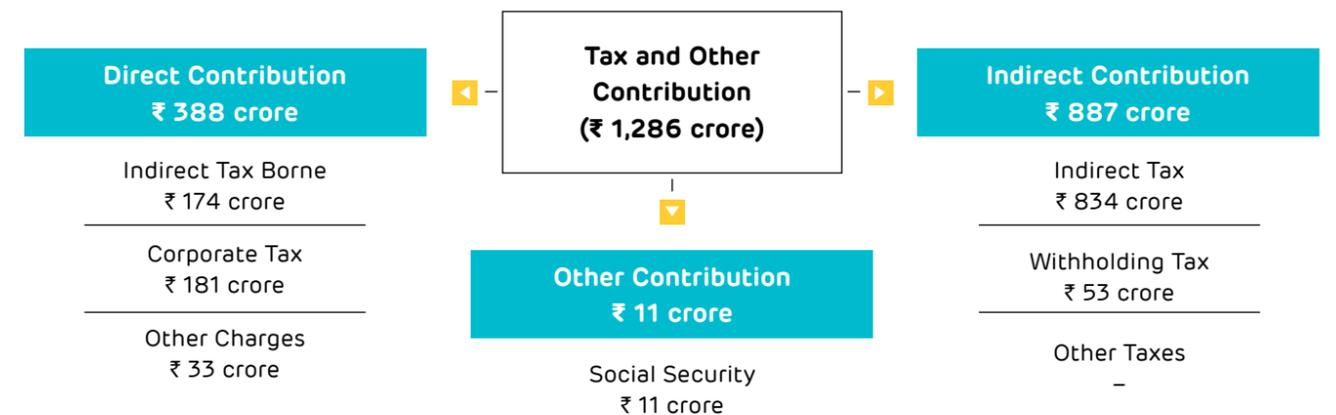
State-wise Tax and Other Contributions

(₹ in crore)



Map not to scale (for representation purposes only)

Contribution-wise Snapshot



We have engaged professional consultants to provide an independent assurance report on the Tax and other contributions to the exchequer. The basis for preparation and our approach to tax can be accessed through following link:

[Basis for preparation and our approach to tax](#)



Independent Limited Assurance Statement to Adani Total Gas Limited on Environmental, Social and Governance Report (FY2025)- Selected Disclosures as part of the Annual Integrated Report.

To the Management of Adani Total Gas Ltd., Ahmedabad, India

Introduction

Intertek India Private Limited ("Intertek") was engaged by Adani Total Gas Limited ("ATGL") to provide an independent limited assurance on its Sustainability Report for FY2025 ("the Report"). The scope of the Report comprises the reporting period of FY2025. The Report is prepared by ATGL based on Global Reporting Initiative (GRI) Standards ' with reference to ' option for sustainability reporting.

The assurance was performed in accordance with the requirements of International Federation of Accountants (IFAC) International Standard on Assurance Engagement (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information.

Objective

The objectives of this limited assurance exercise were, by review of objective evidence, to confirm whether any evidence existed that the sustainability related disclosures, as declared in the Report, were not accurate, complete, consistent, transparent and free of material error or omission with reference to the criteria outlined below.

Intended Users

This Assurance Statement is intended to be a part of the Annual Integrated Report FY2025 of Adani Total Gas Limited.

Responsibilities

The management of ATGL is solely responsible for the development the Report and its presentation. Management is also responsible for the design, implementation and maintenance of internal controls relevant to the preparation of the Report so that it is free from material misstatement, whether due to fraud or error.

Intertek's responsibility, as agreed with the management of ATGL, is to provide assurance and express an opinion on the data and assertions in the Report based on our verification following the assurance scope and criteria given below. Intertek does not accept or assume any responsibility for any other purpose or to any other person or organization. This document represents Intertek's independent and balanced opinion on the content and accuracy of the information and data held within.

Assurance Scope

The Assurance has been provided for sustainability performance disclosures presented by ATGL in its Report. The Assurance boundary included data and information for operation of City Gate Stations, CNG Stations, Offices, Stores, LCNG; EV charging station and Compressed Biogas Plant across pan India of ATGL, ATEL and ATBL respectively. Our scope of assurance included verification of data and information on selected disclosures reported as summarized below:

General Disclosures

- Employees 2021: 2-7
- Workers who are not employees 2021: 2-8

Topic Specific Disclosures

Governance Disclosures

- Diversity and Equal Opportunity 2016: 405-1

Social Disclosures

- Employment 2016: 401-1
- Training and Education 2016: 404-1
- Diversity and Equal Opportunity 2016: 405-2

Assurance Criteria

Intertek conducted the assurance work with reference to requirements of 'Limited Assurance' procedures as per the following standard:

- International Standard on Assurance Engagements (ISAE) 3000 (revised) for 'Assurance Engagements other than Audits or Reviews of Historical Financial Information'.



A limited assurance engagement comprises of limited depth of evidence gathering including inquiry and analytical procedures and limited sampling as per professional judgement of assurance provider. A materiality level of 10% was applied. Assessment of compliance and materiality was undertaken against the stated calculation methodology and criteria.

Methodology

Intertek performed assurance work using a risk-based approach to obtain the information, explanations and evidence that was considered necessary to provide a reasonable level of assurance. The assurance was conducted by desk reviews, visit to ATGL's City Gate station, CNG stations in Vadodara, CBG plant in Barsana, and stakeholder interviews with regards to the reporting and supporting records for the fiscal year 2025 at ATGL's corporate office in Ahmedabad. Our assurance task was planned and carried out during Feb-May 2025. The assessment included the following:

- Review of the Report that was prepared in accordance with the GRI guidelines.
- Review of processes and systems used to gather and consolidate data.
- Examined and reviewed documents, data and other information made available at ATGL's operational sites, corporate office and digitally.
- Conducted interviews with key personnel responsible for data management.
- Assessment of appropriateness of various assumptions, estimations and thresholds used by ATGL for data analysis.
- Review of GRI disclosures on sample basis for the duration from 1st April 2024 to 31st March of 2025 for ATGL was carried out onsite at ATGL's corporate office and selected business locations.
- Appropriate documentary evidence was obtained to support our conclusions on the information and data reviewed and details would be provided in a separate management report. reviewed and details would be provided in a separate management report.

Conclusions

Intertek reviewed selected sustainability disclosures provided by ATGL in its Report. Based on the data and information provided by ATGL, Intertek concludes with limited assurance that there is no evidence that the sustainability data and information presented in the Report is not materially correct. The report provides a fair representation of GRI disclosures and is with reference to the GRI Standards to the best of our knowledge.

Intertek's Competence and Independence

Intertek is a global provider of assurance services with a presence in more than 100 countries employing approximately 43,500 people. The Intertek assurance team included Competent Sustainability Assurance Professionals, who were not involved in the collection and collation of any data except for this Assurance Opinion. Intertek maintains complete impartiality towards any people interviewed.

For Intertek India Pvt. Ltd.

Poonam Sinha

Poonam Sinha
Assistant Manager-Sustainability
Intertek Assuris
2025/05/20

Beth Mielbrecht

Beth Mielbrecht
Project Director
Intertek Assuris
2025/05/20

No member of the verification team (stated above) has a business relationship with Mumbai International Airport Limited stakeholders beyond that is required of this assignment. No form of bribe has been accepted before, throughout and after performing the verification. The verification team has not been intimidated to agree to do this work, change and/or alter the results of the verification. The verification team has not participated in any form of nepotism, self-dealing and/or tampering. If any concerns or conflicts were identified, appropriate mitigation measures were put in place, documented and presented with the final report. The process followed during the verification is based on the principles of impartiality, evidence, fair presentation and documentation. The documentation received and reviewed supports the conclusion reached and stated in this opinion.





www.bdo.in

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Block- A, S. G. Highway, Makarba
Ahmedabad - 380051, INDIA

To
The Board of Directors of Adani Total Gas Limited,
Adani Corporate House,
Shantigram, Near Vaishno Devi Circle,
S. G. Highway, Khodiyar,
Ahmedabad 382 421,
Gujarat, India.

Independent Assurance Report on the audit of the Tax and Other Contributions included in 'ESG Overview' section of Integrated Annual Report of Adani Total Gas Limited ('ATGL') for the Financial Year 2024-25

We ('BDO India LLP' or 'BDO') were engaged by the management of Adani Total Gas Limited ('the Company') to report on 'Tax and Other Contributions' contained in "ESG Overview" section of Integrated Annual Report of the Company and its subsidiaries for the financial year 2024-25 ('Tax and Other Contributions'). This report is not issued under any statute / law.

Management's Responsibility

The management of the Company is responsible for the preparation and presentation of the Tax and Other Contributions in accordance with the 'Basis of Preparation' and for designing, implementing and maintaining such internal control as the management determines is necessary to enable that the Tax and Other Contributions is free from material misstatement, whether due to fraud or error.

In preparing Tax and Other Contributions and the Basis of Preparation, the management of the Company is also responsible for ensuring the efficient conduct of its business, including adherence to the Company's policies, the safeguarding of its assets, implementing and maintaining internal control, preventing and detecting frauds and errors, ensuring the accuracy and completeness of the accounting records and identifying and ensuring that it complies with the laws and regulations applicable to its activities.

Those charged with governance are responsible for overseeing the Company's and its subsidiaries' financial reporting process.

Inherent Limitations in Preparing the Tax and Other Contributions

The management of the Company is responsible for preparing the Basis of Preparation in compliance with relevant requirements including applicable laws and regulations and is also responsible for making estimates that are reasonable in the circumstances and assessing that the basis is appropriate in the context of determination of Tax and Other Contributions. The Basis of Preparation may not be suitable for another purpose.

Independent Auditor's Responsibility

Our responsibility is to examine whether the Tax and Other Contributions for the financial year 2024-25 has been properly prepared in all material respects in accordance with the Basis of Preparation.

We conducted our engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000: Assurance Engagements Other than Audits or Reviews of Historical Financial Information issued by the International Auditing and Assurance Standards Board.

The firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.



BDO India LLP, a Indian limited liability partnership firm, with LLP Identity No. AAB 7880, is a member of BDO International Limited, a UK company limited by guarantee, and forms part of the international BDO network of independent member firms.

Head Office: The Ruby, Level 9, North West Wing, Senapati Bapat Marg, Dadar (W), Mumbai 400028, INDIA | Tel: +91 22 6228 0817



www.bdo.in

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Block- A, S. G. Highway, Makarba
Ahmedabad - 380051, INDIA

We have complied with the independence and other ethical requirements of the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards (IESBA Code)), which is founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Summary of the Work Performed as the Basis for our Assurance Conclusion

A reasonable assurance engagement involves performing procedures to obtain evidence about the Tax and Other Contributions. The nature, timing and extent of procedures selected depend on professional judgment, including the assessment of risks of material misstatement, whether due to fraud or error, in the Tax and Other Contributions. In making those risk assessments, we considered internal control relevant to the preparation of Tax and Other Contributions.

Our procedures includes understanding the process adopted by the Company in preparing Tax and Other Contributions, reviewing basis of preparation, and issuing Independent Assurance Report on Tax and Other Contributions.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Our Conclusion

In our opinion, the Tax and Other Contributions for the financial year 2024-25 is properly prepared, in all material respects, in accordance with the Basis of Preparation.

Restriction on Use

In accordance with the terms of our engagement, this independent assurance report on Tax and Other Contributions has been prepared and issued at the request of ATGL solely for inclusion in its 'ESG Overview' section of Integrated Annual Report for the financial year 2024-25 and should not be used by any other person or for any other purpose or in any other context. We are appointed to only verify the Tax and Other Contributions in accordance with the Basis of Preparation of ATGL shared with us and BDO India LLP shall not be liable to the Company or to any other party for any claims, liabilities or expenses relating to this report. Any party other than ATGL who obtains access to our report or a copy thereof and chooses to rely on our report (or any part thereof) will do so at its own risk. Accordingly, we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this report is shown or, into whose hands it may come without our prior consent in writing.

Our report is released to ATGL on the basis that it shall not be copied, referred to or disclosed, in whole (save for inclusion in ATGL's 'ESG Overview' section of Integrated Annual Report for the financial year 2024-25) or in part, without our prior written consent.

For BDO India LLP



Maulik Manakiwala
Partner

Place: Ahmedabad
Date: 22 May 2025

BDO India LLP, a Indian limited liability partnership firm, with LLP Identity No. AAB 7880, is a member of BDO International Limited, a UK company limited by guarantee, and forms part of the international BDO network of independent member firms.

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