

## **Contents**

#### Part 1: Perspective

- **04** Managing Director's Message
- **05** Chief Executive Officer's Message

#### Part 2: Adani Portfolio of Progress

- 08 About Adani Portfolio
- 13 Adani Portfolio of Companies Overall Tax and Other Contribution

## Part 3: About Adani Energy Solutions Limited

- **16** About Adani Energy Solutions Limited
- 20 AESL Nationwide Presence
- 21 Environmental, Social & Governance (ESG) Initiatives

#### Part 4: Tax Overview

- 30 Tax and How its Perception has Evolved
- 31 Tax and Transparency
- **31** Tax Transparency and Governance
- 33 The Tax Universe

#### Part 5: Our Approach to Tax

- 36 Introduction
- 36 Our Approach to Tax

#### Part 6: The Numbers

- **46** Our Contribution to the exchequer: Tax and Other Contributions
- 49 The Basis of Preparation
- 51 Independent Reasonable Assurance Report
- 54 Annexures

#### Presenting Adami Energy Solutions Limited Tax Transparency Report

Aligned with the highest standards of ethics and transparency, Adani portfolio of companies ('the Group') has been coming out with Tax Transparency Reports since FY 2022-23 as a voluntary extra-statutory initiative. The Tax Transparency Report provides a holistic review of our approach to tax management, along with our long-term policies, tax computation model, and what and when we pay as taxes and other contributions. The document comprises operational and financial numbers related to Adani Energy Solutions Limited ('AESL / the Company') and the Group as on March 31, 2024. We believe that this future-driven document, aimed at bolstering stakeholder transparency, will help reinforce our philosophy of 'Growth with Goodness'.

#### 'Growth with goodness'.

This ethos motivates us to strive to be a world-class leader in businesses that enrich lives and contribute to nation-building. It reinforces our belief that anyone who is touched by our business, whether a company or an individual, must grow holistically. It underpins our unflinching commitment and indefatigable spirit to grow in the face of every adversity with the objective of delivering positive outcomes. Going beyond merely stating our purpose, these three words represent a platform for long-term business sustainability. They demonstrate our commitment to staying engaged with the government; with our tax and other contributions payments representing our contribution to the government. This engagement, in turn, makes it possible for the government to empower the society at large to drive sustained growth momentum for the nation.



## Managing Director's Message



During the year,
AESL contributed
₹ 38,737 mn as
tax and other
contributions. We
also made significant
strides across our
businesses, leveraging
our capabilities to
deliver value to our
customers.

India's energy landscape is transforming, with rising demand and a focus on green, sustainable and reliable energy. Adani Energy Solutions Limited (AESL), formerly Adani Transmission Ltd., is leading this shift. We have strategically transformed into a comprehensive energy solutions provider, backed by robust project execution capability, competencies and innovation. Our recent rebranding reflects our strategic pivot to addressing the nation's energy needs, positioning us as a key player in the energy sector.

I am delighted to present our Tax Transparency Report for FY 2023-24, marking our second year of this voluntary publication. This report reflects

our unwavering commitment to upholding the highest standards of governance, ensuring transparency and accountability in our tax practices. It offers a comprehensive overview of our national footprint, our contributions to the exchequer, tax responsibilities, strategies, and governance practices. Through such additional disclosure, we go beyond regulatory compliance, taking greater responsibility for nation-building, stakeholder value creation and promoting sustainable growth.

Our efforts are reflected in the strategic growth initiatives undertaken during the year, that ensured robust performance and supported India's energy needs. During the year, AESL contributed ₹ 38,737 mn as tax and other contributions. We also made significant strides across our businesses, leveraging our capabilities to deliver value to our customers. Our belief is ESG is a key enabler driving sustainable progress and responsible business practices. We continue to enhance our tax compliance and transparency efforts to contribute meaningfully to the nation's development and to the community at large.

I express my sincerest gratitude to all stakeholders for their continued trust and support. We remain committed to upholding our principles of transparency while actively working to make a positive impact on people's lives.

Anil Sardana

## Chief Executive Officer's Message



46

It has been an incredible journey for AESL, as we navigate a new era of growth and transformation. Despite the dynamic and evolving industry landscape, we advanced with resilience, evolving into a comprehensive energy solutions provider, ready to seize new opportunities. Driven by our passion for innovation and customer-centric solutions, we achieved remarkable accomplishments across the key operational, financial and ESG metrics. Through this report, I am happy to share with you the details of our contributions to the exchequer, and other initiatives to build on the trust placed in us by our stakeholders and progress towards achieving bigger aspirations.

Kandarp Patel

#### Overall Snapshot - Tax and Other Contributions



For more details on tax and other contribution, please refer to Part 6 of the Report.



## **About Adani Portfolio**

At the heart of Adani Portfolio of progress, there is a remarkable journey of evolution over the years. Like the ascending peaks of a mountain range, we have grown every year – not only on the strength of our business performance, but equally and importantly, through our steadfast commitment to environmental, social and governance practices, underpinned by a culture of transparency.

The Adani portfolio of companies today stands amongst India's largest and fastest-growing diversified business portfolios, spanning transport, logistics, energy and utility, materials, metals, mining, and various B2C sectors. The portfolio comprises 11 publicly

traded companies, including four investment grade (IG)-rated businesses, and is India's sole Infrastructure Investment Grade bond issuer.

The financial performance for FY 2023-24 demonstrated the portfolio's deep-rooted strength and expertise. The year saw Adani portfolio of companies achieve an unprecedented milestone, recording the highest-ever EBITDA of ₹82,917 crore (roughly USD 10 billion), a remarkable surge of 45%. This exceptional financial performance drove PAT to a record high of ₹ 40,129 crore, demonstrating a remarkable 70.8% growth. Net Debt to EBITDA further fell to 2.2x from 3.3x over the previous year, lend the portfolio additional headroom for

future growth. All this resulted in all-time-high levels of liquidity for the Group, with a cash balance of ₹ 59,791 crore.

The portfolio's robust contribution to the exchequer, in the form of direct, indirect and other contributions, underlines its transparent and sustainable approach to taxation. The Adani Group sees this contribution as a vital engine for the nation's socio-economic development, in line with its vision for sustainable and holistic value creation. Stringent compliance with all statutory obligations remains an uncompromising imperative for the portfolio to uphold the highest standards of corporate responsibility.

Adani portfolio of companies, headquartered in Ahmedabad, India, has been founded and promoted by visionary industrialist Mr. Gautam Adani. The operations of the portfolio commenced in 1988 with commodity trading business under the flagship company, Adani Enterprises Limited (previously Adani Exports Limited), and has, since, grown and expanded under the inspiring leadership of Mr. Adani to scale new heights.

In one of the largest commitments of its kind globally, a significant USD 100 billion investment has been earmarked for a green transition and transport by 2030. This includes building Integrated Green Hydrogen Ecosystem encompassing three giga factories to develop 10 GW solar panels, 5 GW hydrogen electrolysers and expanding the portfolio of Adani renewables to 50 GW. Five major companies – Adani Ports, Adani Green Energy, Adani Energy

Solutions, ACC and Ambuja – have committed to achieving net zero by 2050. Furthermore, a pledge has been made at WEF's 1t.org to plant 100 mn trees by 2030.

Adani Foundation, currently touching over 9.1 mn lives, is positioned to address the critical needs of New India in areas like health, nutrition, education, basic sanitation, women's livelihood and skills development.

#### Core Philosophy

The Promoter

Adani portfolio of companies is guided by the philosophy of 'Growth with Goodness', which emphasises sustainable and responsible development aligned with national priorities. To this end, ambitious ESG targets, with a focus on decarbonisation, have been set.

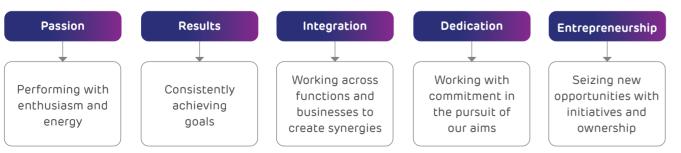
#### Vision

To be a world-class leader in businesses that enrich lives and contribute to nations in building infrastructure through sustainable value creation.

#### **Values**

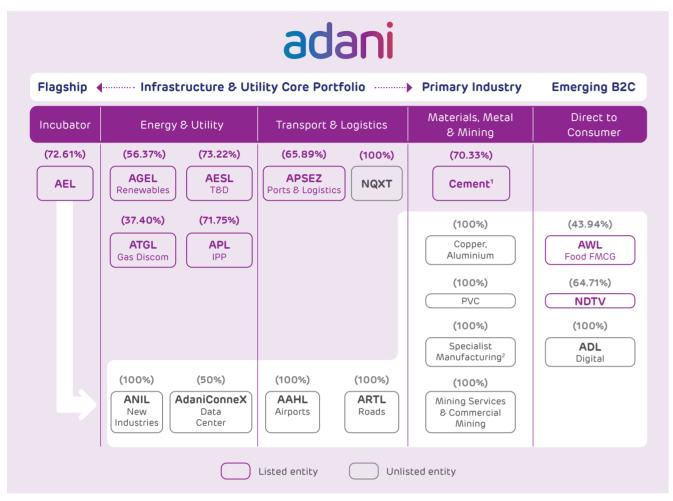


#### Culture





#### Portfolio structure: A world-class infrastructure and utility portfolio



(%) Adani family's equity stake in the Adani portfolio companies

(%) AEL equity stake

Holdings are as on March 31, 2024, except for cement, in which holding is as on April 30, 2024.

- Cement business includes 70.33% stake in Ambuja Cements Limited which, in turn, owns 50.05% in ACC Limited, Adani directly owns 6.64% stake in ACC Limited. Ambuja also owns 60.44% stake in Sanghi Industries
- 2. Includes the manufacturing of Defence and Aerospace Equipment

Data Center, JV with EdgeConneX,
AEL: Adani Enterprises Limited;
APSEZ: Adani Ports and Special
Economic Zone Limited; AESL:
Adani Energy Solutions Limited;
APL: Adani Power Limited: AGEL:

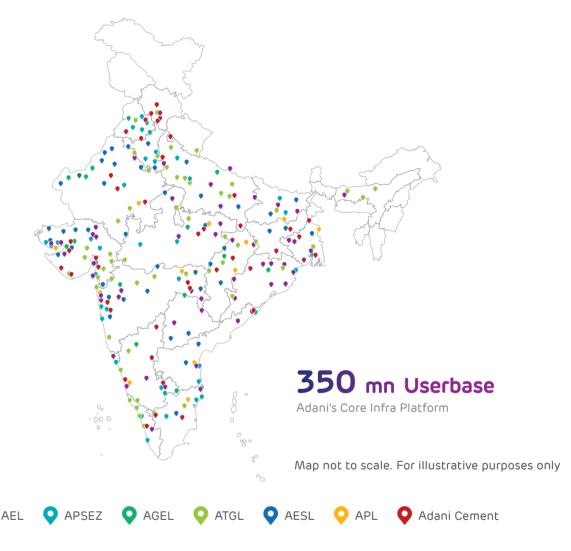
Adani Green Energy Limited; AAHL:
Adani Airport Holdings Limited; ARTL:
Adani Roads Transport Limited; ANIL:
Adani New Industries Limited; AWL:
Adani Wilmar Limited; ADL: Adani
Digital Labs Private Limited; NDTV: New

Delhi Television Limited; **PVC**: Polyvinyl Chloride; **NQXT**: North Queensland Export Terminal; **ATGL**: Adani Total Gas Ltd, JV with TotalEnergies; **T&D**: Transmission & Distribution; **IPP**: Independent Power Producer

#### Committed to a Stronger than Ever India

With its extensive capacities spanning critical sectors of the economy and a nationwide footprint, Adani portfolio of companies boldly leads the way in building a stronger than ever India designed to steer global growth. The Adani portfolio of companies are strategically positioned to capture market leadership and propel the nation forward.

#### National Footprint with Deep Penetration



#### Scale and Market Leadership Across Businesses

#### Adani Enterprises Limited

- India's largest business incubation company
- India's largest airport infrastructure company
- 4 GW module manufacturing
- 1.5 GW wind turbine generator capacity

- 17 MW data center capacity
- 500 KTPA Copper unit at Mundra
- 5,000+ lane kms of road projects
- 9 mine service contracts (operational: 4 coal and 1 iron ore)

#### Ambuja Cements Limited

(with subsidiaries ACC Limited and Sanghi Industries Limited)

- Second-largest cement manufacturer in India
- Iconic cement brand
- 78.9 MTPA cement manufacturing capacity

#### Adani Total Gas Limited

- India's largest private city gas distribution business
- 52 geographical areas of gas supplies, including 19 IOAGPL GA's
- 606 EV charging points and 1,040 under various stages of construction

#### Adani Power Limited

- India's largest private sector thermal power producer
- India's largest single location private thermal IPP (Mundra)
- 15.25 GW of operating capacity and 4.72 GW locked-in portfolio including under-construction and under-acquisition plants

## Adani Ports and Special Economic Zone Limited

- India's largest private sector port operator
- India's largest port (Mundra)
- Highest margin among peers
- 627 MMT cargo handling capacity

#### Adani Green Energy Limited

- Among the world's largest renewable energy business
- World's largest wind-solar hybrid power project (2,140 MW) in Rajasthan
- 21,953 MW locked-in portfolio
- Fully secured growth up to 50 GW by 2030

#### Adani Energy Solutions Limited

- India's largest private-sector transmission and distribution company with over 20,500 ckm of network and 12 mn consumers
- Only private player in the country to have built and operating a HVDC line
- One of India's most efficient transmission and distribution players in terms of line availability benchmarks, and distribution losses and other operating parameters
- AEML is rated as India's No.1 power utility (2<sup>nd</sup> year in a row)
- 34.35% Renewable power in the overall energy mix of AEML by FY 2023-24

#### **NDTV** Limited

- Among India's most trusted media companies
- Countries Presence 65
- Cables & DTH Households (in mn)
   NDTV 24\*7 (88), NDTV India (140), NDTV Profit (34)
- 32.25 mn YouTube subscribers

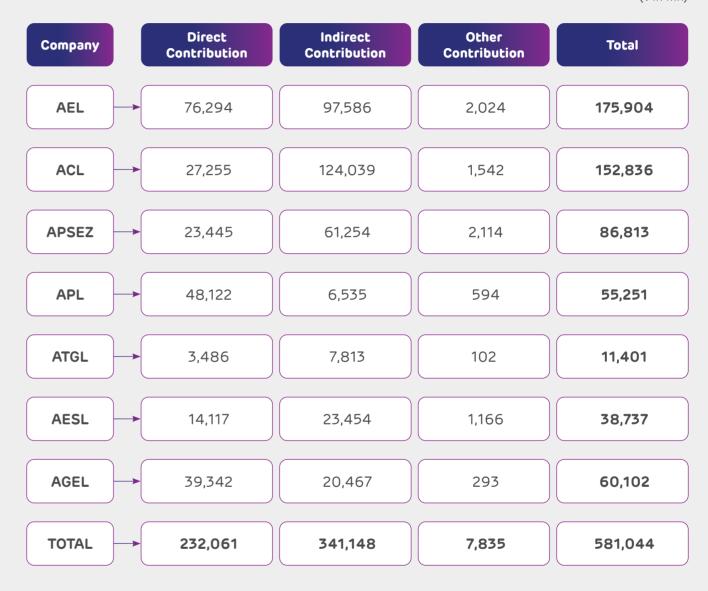
#### Adani Wilmar Limited

- India's largest edible oil brand
- Amongst India's largest port-based edible oil refinery
- 5,000 MT per day edible oil refinery capacity
- 7.2 lakh retail outlets

# TREA

# Adani Portfolio of Companies - Overall Tax & Other Contributions for FY 2023-24

(₹ in mn)



For Basis of Preparation and Scope, please refer Individual Tax Transparency Reports published by each entities.



## About Adani Energy Solutions Limited

#### Leading India's Quest for Energy Access and Energy Security

AESL is India's largest private integrated energy service provider, pioneering transformative solutions across the nation's dynamic energy spectrum in the most efficient, sustainable and affordable manner through operational excellence and technology-led innovation. From transmission to retail electricity distribution, smart metering, cooling solutions and energy-as-a-service, our portfolio spans various facets of the energy domain.

AESL is consolidating its position as India's largest private Transmission & Distribution (T&D) company with a growing smart metering portfolio, contributing to nation-building by delivering energy in the most efficient, sustainable and affordable manner through operational excellence and technology-led innovation. AESL's recent forays into smart metering, cooling solutions, and energy-as-a-service will further enhance the energy sector's sustainability and resilience.

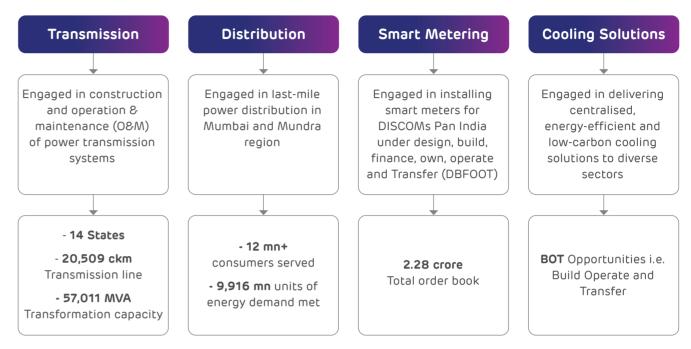
Through integrated offerings that are aligned with sustainable development goals, AESL leads

the charge in revolutionising the energy delivery paradigm for end consumers. Our catalytic role positions us to strengthen our market foothold and maximise value creation for all stakeholders.

#### Portfolio and Presence -Stronger Tomorrow with Expansive Ecosystems

AESL stands at the helm of India's energy landscape, powering industries, illuminating homes, and driving economic growth. With the Company's formidable presence spanning diverse energy domains and geographies, we ensure that energy flows reliably, sustainably, and efficiently, fuelling the nation's journey towards a brighter, more prosperous, and climate-resilient future.

#### Our diversified business verticals



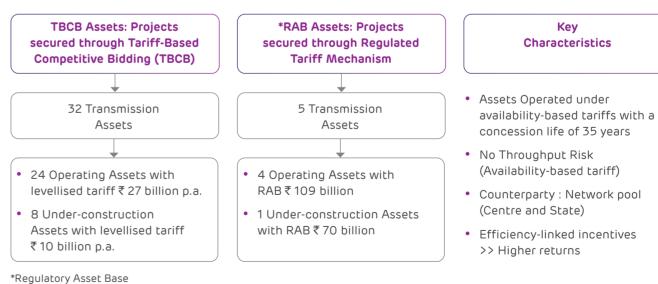
#### **Business Segment Review**

#### Transmission / Grid-Network Vertical

#### Empowering India with reliable transmission infrastructure

Power transmission is a mega opportunity in India as the country's power demand grows rapidly along with an emphasis on meeting it through renewable energy. With our project management expertise, coupled with technology-led operations and maintenance capabilities, AESL remains at the forefront of swiftly expanding transmission capacities and efficiently taking power to demand centres.

#### **Business structure outlook**



Market Opportunity: ₹ 2,280 billion (USD 28 billion) opportunity for private sector over 10-15 years

#### Distribution / Retail Power Distribution Vertical

#### Delivering reliable and quality power for sustainable growth

AESL is revolutionising India's energy landscape, consistently raising the bar for operational efficiency and customer services. With its state-of-the-art infrastructure, advanced technology, digitisation, and customer-centric approach, the Company has become a trusted provider of reliable, dependable, and affordable electricity supplies to millions in Mumbai and Mundra SEZ. It is also driving grid decarbonisation by enhancing its renewable energy share, leading the way towards a cleaner and greener future for our communities.

#### Business structure outlook



- Adani Electricity Mumbai Limited in Mumbai with RAB of ₹ 79 billion
- MPSEZ Utilities Limited in Mundra SEZ with RAB of ₹ 0.8 billion

#### Key Characteristics

- Licence period: 25-year and perpetual business
- Counterparty: Pool of 12 mn+ consumers
- No throughput risk (RAB-based returns)
- · Operations & Maintenance costs are pass-through

Market Opportunity (new parallel distribution areas): Parallel Distribution Licensee : Target ≥20% of the total market size (38.8 BUs (billion units) or ~4.5 millions customers or ₹ 200 billion capital outlay)

The Company has proposed and applied for parallel licensing opportunities in Navi Mumbai, Gautam Buddha Nagar and Mundra.

\*Regulated Asset Base refers to the value of the assets that companies use to provide regulated services and includes infrastructure investments such as power lines, substations, and other assets necessary for transmission and distribution of electricity.

#### Smart Metering

#### Energy Monitoring Solutions for Sustainable Consumption

AESL's steadfast commitment to providing customer-centric solutions, especially in retail last-mile connectivity, has unlocked significant growth potential and positioned us to seize a dominant market share in the smart meters segment. By leveraging our execution excellence, the Company aims to rapidly deploy advanced metering infrastructure that enables real-time monitoring and management of energy usage, empowering consumers to make informed decisions and optimise their energy consumption.



#### **Business structure outlook**

Operates under DBFOOT model i.e. Design, Build, Finance, Own, Operate and Transfer

- · Currently, under implementation stage
- Leading position with ~20% market share i.e.
   Secured 2.28 crore smart meter contracts out of
   11.28 crore contracts awarded with contract value of ~₹ 27,200 crore

#### Key Characteristics

- Contract period: 10 Years
- Payment Security through Direct debit facility
- Counterparty: Pool of over 91 mn consumers
- Enhanced energy efficiency and RE integration
- Revolving capex model aided by upfront billing

Market Opportunity: 250 mn meters - Capital investment of ~ ₹ 2,200 billion by 2026

#### Cooling Solutions Vertical

#### Pioneering Sustainable Solutions in Comfort and Space Cooling

Amidst the rising climate crisis and India's march towards a new-age economy characterised by large-scale infrastructure creation, industrial development, and emphasis on data centres and cold chains, the cooling solutions sector is gathering momentum. The need is to deliver optimised solutions economically, efficiently and sustainably. The Company is leading the charge in addressing this urgency. With its centralised, energy-efficient, and low-carbon cooling solutions, AESL is poised to redefine standards and drive sustainability in the comfort and space cooling sector.

#### Business structure outlook

Operates under CaaS model i.e. Cooling as a service with flexible power sources options from grid, wholesale or captive sources

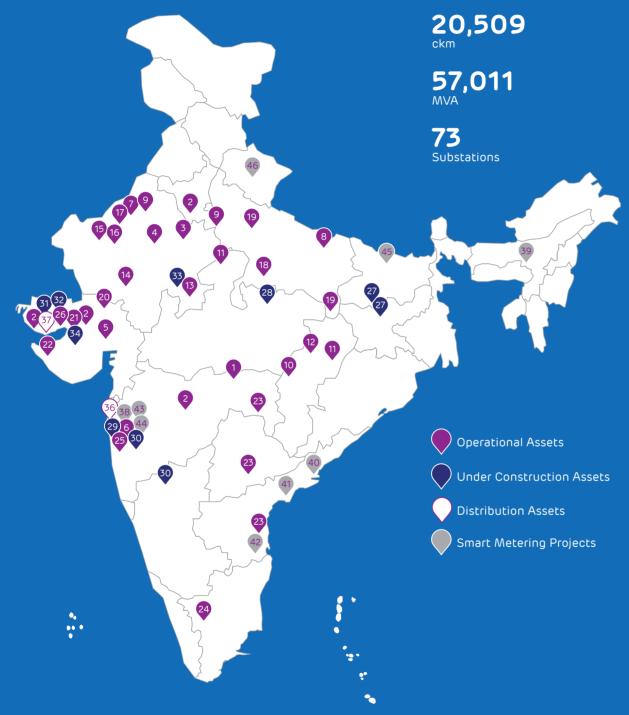
- Developed plan of action for cooling solutions business in FY 2023-24
- Dedicated entity: Adani Cooling Solutions Limited

#### Key Characteristics

- Due to presence in transmission and distribution business, inputs can be efficiently arranged i.e. electricity and water
- Cooling market is primarily dominated by international competition, diverse business expertise and comprehensive understanding of Indian market gives unique advantage

<sup>\*</sup>Regulatory Asset Base

## **AESL Nationwide Presence**



#### Notes:

Map not to scale (for representation purposes only)

Assets include fully built, under-construction projects based on regulatory-approved and bid-based tariff profiles.
\*Projects awarded under RTM basis (extension of existing projects).

ckm: Circuit Kilometre; MVA: Mega Volt Amp

# Environmental, Social & Governance (ESG) Initiatives

Power infrastructure construction has significant ESG impacts.
Responsible, safe and sustainable Operations & Maintenance of power lines and development of nearby communities are therefore both ethical and business critical. It leads to enhanced reputation,

risk management, regulatory compliance, market opportunities, and employee engagement. The Company's ESG approach is guided by goal-based commitments, supported by robust governance for effective decision-making and their implementation.

The Company further ensures tax is an integral part of each ESG element – compliance with environmental taxes, changing attitude to tax behaviours, increased transparency and robust tax governance structures to ensure that tax policies reflect wider sustainability efforts.

#### AESL's Alignment with Global and National Sustainability Standards

## Guiding principles

- United Nations Global Compact
- UN Sustainable Development Goals
- India Business & Biodiversity Initiative (IBBI)
- Sustainability-Linked Bond Principles
- IFC E&S Performance Standards

## Disclosure standards

- Task Force on Climate-related Financial Disclosures
- Taskforce on Nature-related Financial Disclosures
- Global Reporting Initiative Standards
- Carbon Disclosure Project Disclosure
- Business Responsibility and Sustainability Reporting
- Greenhouse Gas Protocol

There is a growing realization that ESG forms a critical part of business and value creation. Tax is an integral part of each element of the ESG agenda - compliance with Environmental Taxes; changing attitude to tax behaviors; increased transparency and robust tax governance structures to ensure tax policies reflect wider sustainability efforts.

	Tax to ESG Metrics	
Environmental	Social	Governance
Tax in the E	Tax in the S	Tax in the G
<ul> <li>Environmental taxes e.g., carbon taxes, plastics</li> </ul>	<ul> <li>Social insurance, healthcare and pension premiums</li> </ul>	<ul> <li>Aligning ESG policy with tax behaviour</li> </ul>
• Green subsidies and incentives	Gig economy, flexible workforce and	Tax reporting and
<ul> <li>Compliance and reporting requirements</li> </ul>	global mobility • Equal pay, living wages and	<ul><li>stakeholder communication</li><li>Process controls and</li></ul>
Carbon adjustment mechanism	remuneration policies	compliance assurance

#### **ESG Commitments & Targets**

AESL has defined its ESG focus under three strategic pillars – global climate action, corporate citizenship and enabling social transformation and responsible business practices – in alignment with the UN SDGs. The Company has set targets under each and undertook several efforts to achieve them.

#### **Environmental**

AESL strives to effectively address climate change and nurture the ecosystems, committed to becoming Net Zero by 2050 with all actions fully aligned to it.

## Environmental commitments

- To be in Top 10 companies of the world in ESG benchmarking of electric utility sector by FY 2024-25
- To purchase RE power at Adani Electricity Mumbai Limited (AEML) 60% by FY 2026-27 (committed under SLB framework) & 70% RE sources by FY 2029-30
- To reduce Emission intensity [tCO $_2$ e/ EBIDTA] @ AEML by 40% by FY 2024-25, 50% by FY 2026-27 & 70% by FY 2029-30 w.r.t baseline FY 2018-19
- To remain Single-use-Plastic-Free (SuPF) company
- To remain Zero-Waste-to-Landfill (ZWL) company
- To retain Water Positive status for the company
- To achieve No Net Loss of biodiversity on ongoing basis
- To complete ESG Evaluation and engage all Tier-1 critical suppliers through GHG Suppliers' Engagement Programme for decarbonisation of value chain by FY 2025-26

Targets			
Indicator	FY 2025 Target	FY 2023 Target	Status: FY 2024
Ranking in Global ESG benchmarking of electric utility sector	Top 10	NA	Top 20*
Water positive sites	100%	100%	100%
<ul> <li>Zero waste to landfill operating sites</li> </ul>	100%	100%	100%
Single-use plastic-free operating sites	100%	100%	100%
<ul> <li>No Net Loss of biodiversity</li> </ul>	100%	NA	Ongoing

<sup>\*</sup>AESL is in the Top 20 companies globally for Sustainalytics ESG benchmarking of the Electric Utility Sector by FY 2024-25

## Social - Health & Safety

AESL ensures a culture of "No Fatality, No Injuries, and No Excuses" for all employees and contractors, guided by its Occupational Health and Safety Policy, a comprehensive safety governance structure and ISO 45001:2018 aligned Integrated Management System (IMS).

#### Safety Awareness Drives in FY 2023-24

May Safe -Season 4

Online training covering 8 safety-related topics for employees and business associates

Unchaaicampaign on working at heights

2-days campaign themed 'Knowing the Heights Better' based on 5C Model (Climb, Control, Competence, Capacity and Check) to ensure safety while working at heights across sites

#### Audio Video Learning Pack

'Excavation Safety Standard' and 'Hot Work Safety Standard' awareness drive conducted at various sites along with a short message for the leadership team

#### Saksham

Mandatory Contractor Workmen Incubation & Induction Programme released by group safety was conducted at various sites for better learner experience and to enhance training effectiveness

Work at Height and Rescue Training

 $\ensuremath{\text{2-days}}$  training conducted at various sites to demonstrate multiple fall-arrest equipment and procedures

Urja -Campaign on Electrical Safety

2-days campaign on 5E Model (Exposure, Enable, Educate, Equip and Ensure) conducted at various sites to create mass awareness on Electrical Safety

Safety Campaign on Electrical Safety

'Excavation Safety Standard' and 'Hot Work Safety Standard' awareness drive conducted at various sites along with a short message for the leadership team

Mandatory Training on Gensuite Reporting

Training sessions on Gensuite reporting conducted at sites to provide guidance on the Gensuite reporting process and procedures for improving the quality of observations

#### Case study - Ensuring Driving Safety Through Digital Solution

Introduction of smart safety solution

- Evaluates high-risk behaviours
- Measures average safety score for the employees
- Counselling of employees with high-risk behaviours

 Significant decline in road accidents, zero road-accidents occurred in FY 2023-24 owing to the deployment of smart safety solution

#### Targets achieved

Indicator	FY 2023-24	FY 2024-25 target
Workplace Fatality	0	Zero
Lost Time Injury Frequency Rate (LTIFR)	0.33	Zero
Total Recordable Incident Frequency Rate - TRIFR	0	Zero
Average Hours of Training Provided per Employee and Contractual Worker on Health and Safety baseline	30.13	To improve continuously as compared to the baseline i.e., 15.6 hours in FY 2020-21
		(Total training hours/ number of employees)
Locations (Sites and Offices) Assessed by Third-party on Health & Safety Practices	20	25

#### Social - Corporate Social Responsibility

AESL collaborates with the Adani Foundation towards the equitable and sustainable development of marginalised communities in alignment with the Group's 'Growth with Goodness' philosophy. The aim is to drive the nation's prosperity through empowered societies.

#### **Empowerment through Education**

#### **Projects**

#### **Objectives**

#### Achievements

Project Uthhan

Enhance learning capabilities in Government schools

12,050 students; 60 Brihanmumbai Municipal Corporation (BMC) schools; 20 Uthhan Sahayaks

#### Sustainable Livelihood Development

Meri Sangini Meri Margdarshika in Sirohi & Jalore, Rajasthan and Nagpur, Maharashtra

**>>** 

Empowering women leaders to drive awareness and facilitate utilisation of government schemes

**>>** 

32 villages covered; 15,648 total beneficiaries linked with government's social welfare scheme; 3,780 facilitated to avail legitimate documents; facilitated access to benefits worth ₹ 162 lakh in Nagpur & ₹ 173 lakh in Sirohi

Swabhiman (Mumbai)



Promoting self-reliance and entrepreneurship in women from economical weaker sections by forming Entrepreneurship Self Help Groups (ESHGs) and encouraging them to save in ESHG account

*y* 

3,985 Women united to form 278 ESHGs; ₹ 56 lakh saved collectively by beneficiaries and bank linkages; 434 women benefited through trade-based entrepreneurship trainings;

₹ 2,000 - ₹ 3,500 average increase in beneficiaries' income; 23 Groups received ₹ 23 lakh through bank credit linkage for business expansion

#### **Community Health**

Deploying Mobile Healthcare Units (MHCU)



Offering Preventive healthcare awareness and medical services across 25 villages



33,511 Medical consultations provided; 3,776 Patients treated in 12 multi-speciality camps by General Physicians and Specialists

#### Governance

AESL is committed to the highest standards of ethical and governance practices, supported by its Code of Conduct and robust governance policies and principles. This supports long-term partnerships, financial stability and business integrity.

#### Key governance focus areas

Board Composition and Independence - Maintaining Board diversity (Independent Directors, industry expertise and background representation)

Transparency and Disclosure - Regularly publish financial and sustainability reports, and other relevant information

Risk Management – Robust risk framework for effective management

Ethical Conduct and Anti-Corruption Measures – Implement Code of Conduct for employees and Directors to promote business ethics, anti-corruption and positive work culture

Shareholder Rights and Engagement – Protecting rights and making informed decision-making aligned with their

Environmental and Social Responsibility – Focus on achieving environmental and social well-being targets

#### Targets achieved

Indicator	FY 2023-24	Short-term to Medium-term Targets
% of Women Directors in the Board	28.5%	28.5%
% of Independent Directors in the Board	57.14%	57.14%
Cases Related to Corruption and Bribery, Fines & Settlements for Anti-Competitive Practices or Breach of Code	Zero	Zero
% of Governance Body Members and Employees Trained on Anti-Corruption	100%	100%

#### **UN SDGs**























#### Awards and accolades



Won Golden Peacock Award in Environment Management (GPEMA) for sustainable practice



Awarded Excellence in Road Safety and Excellence in Innovation in Safety Technology by OSH India Awards for Road & Workplace Safety



Won Global Sustainability Leadership Award 2023 by the World Sustainability Congress for best sustainable performance



Won 4th CII's Climate Action Programme (CAP 2.00) award 2023 under Resilient (highest) category



Excellence in Procurement Innovation & Outstanding Leader in Procurement award at 8th ISM-India Conference & CPO Awards 2023



Platinum Award for Occupational Health and Safety at the 8<sup>th</sup> Apex India Occupational Health and Safety Award 2023



Confederation of Indian Industry 2023 DX Award in the Best Practices category as the Most Innovative Company





## Tax and How its Perception has Evolved

#### Overview

Recent years have witnessed a fundamental transformation in the way tax is perceived. From being seen as a cost for staying in business and a licence to operate, tax is now being increasingly accepted as a welcome and voluntary initiative, communicating private contributions to public finances and making it possible for the government to provide society with an enabling platform. A new generation of corporate thinkers are, in fact, placing tax at the centre of the governance circle, treating it as a valuable contribution that empowers governments to provide citizens with a range of facilities

and benefits rather than as an expense entry in their books.

This evolved tax perception is also commensurately driving an increased emphasis on transparent explanations by companies on vital tax-related issues, such as policies related to tax management, quantum of various taxes, process of tax computation, compliance discipline that makes timely payment a reality, the operating structure that makes timely

compliance possible, and periodic checks (audits) covering the discipline. This has made tax responsibility a subject central to good governance, and has necessitated a separate document called the Tax Transparency Report.



## Tax and Transparency

#### Overview

With the global tax environment entering a new age, forward-looking companies are voluntarily bringing out the Tax Transparency Report even though the same is not mandatory. Through the report, such companies seek to drive wider stakeholder attention and greater credibility, besides creating the basis for the highest standards of tax transparency.

The emergence of this subject as one of the levers of long-term value creation for the wider stakeholder community has been led by the growing shift towards complete corporate transparency, along with the need to clearly describe the interpretation used by a company to arrive at its tax computation. The Tax Transparency Report helps stakeholders make informed investing decisions by

understanding the nature of the Company's tax jurisdictions and the quantum of their tax payments. It contributes to better stakeholder perception and valuation.

For companies, such reporting helps in strengthening their stakeholder recruitment and retention, leading to enhanced business sustainability. It further aids them in distinguishing between

the taxes received on behalf of the government and on the profit generated by them, enabling a more informed understanding. Such documentation also provides a consolidated picture on a company's holistic contribution (statutory taxes and levies) towards economic development and sustainability through tax payments, which is essential for corporate credibility.

The broad structure of the tax transparency report is inspired by Global Reporting Initiative 207 ('GRI') issued by the Global Sustainability Standards Board and inspired by global best practices. In addition to the tax and other contributions made to the exchequer, the report further elaborates on our outlook on taxation and how responsibly and effectively we have designed our tax principles.

## Tax Transparency and Governance

#### Overview

Amid the growing acceptance of tax treatment as a subject integral to a company's governance commitment, Adani portfolio perceives its tax and related payments as an important measure of its character and growth strategy. We look at the government as the biggest stakeholder in our business, providing us with the platforms and freedoms needed to stay and grow in business. We view tax transparency as one of the most significant levers of corporate intent and pedigree, and

believe that our contribution to the exchequer makes it possible for the government to reinvest in enabling infrastructure, which accelerates the virtuous national cycle. In our opinion, enhanced disclosures can be transformed into a deeper stakeholder understanding and competitive advantage.

Adani portfolio's governance commitment ensures that tax affairs are managed ethically and methodically, leading to stakeholder assurance. Our tax teams engage with the business teams to

understand the operating models of transactions, and tax decisions are initiated by competent tax professionals in collaboration with experienced business colleagues and senior management. To replicate progressive practices, the Group facilitates an exchange of best practices among the Adani Group constituent, through standard operating procedures and policies that guide compliance and periodic reassessment of the financial controls embedded in processes.

#### **Responsible Tax Principles**

#### Transparency

Provide complete information to all our stakeholders about our tax approach and payments.

#### Structures

Use structures guided by commercial considerations and aligned with business activities (as opposed to abusive tax outcomes).

# Accountability and governance

Contribution to the exchequer represents an extension of our corporate responsibility and is overseen by our Board of Directors.

## Tax incentives

Tax incentives claimed are transparent and consistent with statutory or regulatory frameworks.

#### Compliance

Stringent compliance with the tax legislation of the regions of our presence, paying the right amount of tax at the right time and at the right place.

#### Relationships

Develop co-operative relationships with tax authorities and other stakeholders based on trust.

## Supporting the tax eco-system

Engage in dialogues with governments, advocacy groups and civil society to help formulate tax systems, legislation and



## The Tax Universe

At Adani portfolio, we are an intermediate collector of tax on behalf of the government that is then paid, besides being a payer of tax in our own right. This dual role puts a premium on the capacity to transparently report collections, disbursements and payments.

#### The Corporate Tax Range We Cover

Direct contribution	Indirect contribution	Other contributions
Corporate tax on income	Withholding tax	Social security
Indirect tax borne	Indirect tax	
Other charges	Electricity duty	
	Other taxes	

#### **Our Tax Transparency Structure**





## Introduction

At Adani portfolio, we consider tax as a material topic that plays a significant role in making economic and social contributions (sustainable development goals).

This commitment is aligned with our vision to be a world-class leader in businesses that enrich lives and contribute to nations in building

infrastructure through sustainable value creation.

We believe that companies are under an obligation to comply with prevailing tax legislations; the management owns a responsibility to stakeholders to address expectations of good tax AESL is fully committed to complying with the applicable tax laws of respective countries, wherever applicable and paying its fair share of taxes to government(s). The Company's approach to tax balances compliances with business activities and articulates Group strategies and processes.



#### Disclosures and Reporting

At AESL, we focus on transparency and standards related to disclosures / reporting on how tax matters are managed. This report is a validation of the commitment. As a policy, we

disclose what is required under law and extend beyond, setting a standard in terms of disclosures/ reporting. We view appropriate disclosures and reporting as an opportunity to engage with key stakeholders. The objective of

Pillar 1 reallocates a certain portion

of the residual profits to the market

jurisdiction, while Pillar 2 lays down

a global minimum tax rate of 15%

in the countries in which such

such disclosures / reporting is to increase transparency and promote credibility leading to stakeholder trust (government, regulators and investors).

## Our Approach to Tax

#### **Fundamentals**



Compliances



Disclosures and Reporting

In-house Tax Team



Tax Strategy



Risk Management and Dispute Resolution



Related Party Transactions and Transfer Pricing





Tax Processes and Controls



Advocacy



Engaging with Tax **Authorities** 



#### Compliances

Tax Governance

We endeavour to be fully compliant with applicable tax laws in the geographies of our presence and fulfil statutory obligations in those countries which means setting the threshold at zero-tolerance towards non-compliances or any compliance delays.

In view of this, our vision is to create efficient systems from a tax governance perspective (including compliances). We will continue to

seek the assistance of tax advisors whenever warranted to ensure complete and timely compliance with applicable regulations.

Our operational framework comprises an annual compliance calendar that tracks/monitors statutory due dates. These compliances are monitored in real-time. A system of checks and balances (preparer-reviewerapprover) ensures that no compliances are deferred or missed. This system is reviewed periodically and aligned with regulatory changes, ensuring that it remains contemporary. This ensures that the system is adaptive, responsive and relevant. It is our endeavour to set internal timelines for statutory compliances and meet such internal timelines. We endeavour to ensure that there are no lapses in adhering to the statutory timelines and that we set a benchmark for others in the industry to follow.

All tax returns and tax audit reports were filed within statutory due dates

Be that as it may, Adani Group All multinational corporations has proactively evaluated the are impacted by changes in the implications under Pillar 1 and Pillar international tax framework as they 2. This provides greater certainty in operate across borders in multiple terms of the tax impact and leads countries. Currently, under BEPS to development of a robust tax 2.0 - Pillar 1 and Pillar 2 are workin-progress for implementation.

> The Company invests in a location with a goal to build long-term relationships with investors, respective governments, employees and local communities. Taxes collected and paid by the Company, on behalf of the government is a representation of company's adherence towards responsible practice as an organisation.



#### Tax Strategy

As a principle, we believe in paying our fair share of taxes without seeking to circumvent, avoid or evade taxes. We endeavour to operate businesses efficiently and create value for shareholders. In this context, tax optimisation is undertaken with a commercial rationale and substance of the transaction being at the helm.

We track tax laws and concessions, seeking to optimise our tax exposure within available guardrails. Our tax planning is guided by a sense of integrity. The result is that we claim tax incentives/deductions aligned with our strategy and which relate to investments and economic substance.

The international tax landscape has been rapidly evolving following the inception of base erosion and profit shifting ('BEPS') project of G20 / Organization of Economic Cooperation and Development. BEPS attempts to ensure that profits are taxed in the country of economic activity and value creation. India has been an extremely active participant in this regard.

multinational corporations operate. While many jurisdictions are moving forward with the implementation of Pillar 2, consensus on Pillar 1 is uncertain. Pillar 2 is designed to create a more equitable tax environment, enhance revenue protection for countries facing tax base erosion, and promote more stable and predictable international tax policies. This transformative approach supports a fairer global economy. While it may involve adjustments to domestic tax laws, international agreements, and increased administrative responsibilities, it also encourages robust international cooperation to achieve its goals.



## Risk Management and Dispute Resolution

We do not adopt aggressive tax positions; we are committed to positions with an underlying substance and commercial activities / rationale. Wherever significant positions are taken, we seek advice from external experts / senior counsels. We follow sustainable tax practices with high governance. We identify tax risks with the perspective that they may be avoided / mitigated. This approach comprises tax risk analysis and aligns with governance

best practices. Our tax governance framework focusses on how tax risks are identified, managed, monitored and mitigated.

We do recognise that there could be differences of opinion with the tax authorities, potentially leading to disputes. AESL focusses on proactively presenting relevant facts before the tax authorities with comprehensive documentation and a transparent dialogue. In respect of tax disputes, the assistance of external tax experts and senior counsels could be sought.

As a measure of corporate predictability, we periodically review the tax risks to ascertain tax position changes in the context of an evolving tax landscape (law changes, subsequent judicial precedents etc.). The key positions adopted are appropriately documented along with the basis for the same. Material tax matters are reported to the committee / sub-committee of Board of Directors, as considered appropriate.

Adani portfolio's transfer pricing framework covers transfer pricing filings with the tax authorities. Such filings include country-by-country reporting and the master file. These filings transparently report the key business aspects (e.g. number of employees in a country, third party revenues, intra-group revenues) to the tax authorities.

The transfer pricing documentation as specified under the income tax laws is maintained for related party transactions and such transactions are also undertaken on an arm's-length basis, as required under income tax laws. To determine the arm's-length price, a FAR (functions performed, assets employed and risks assumed) Analysis

and benchmarking exercise is undertaken internally or externally (as considered appropriate). This framework is directed to a standardised uniform practice across Adani Portfolio entities.

All transfer pricing tax filings are completed within statutory due dates

#### Our tax risk management approach

#### Risk assessment

Continuously track changes in tax legislations and policies

#### Self-assessment

Invest controls and governance that prevent non-compliance

#### Resource management

Seek professional advice wherever the tax law is unclear

#### Industry benchmark

Examine approaches by peers related to tax risks management



## Related Party Transactions and Transfer Pricing

Adani portfolio enters related party transactions with portfolio companies in the following manner:

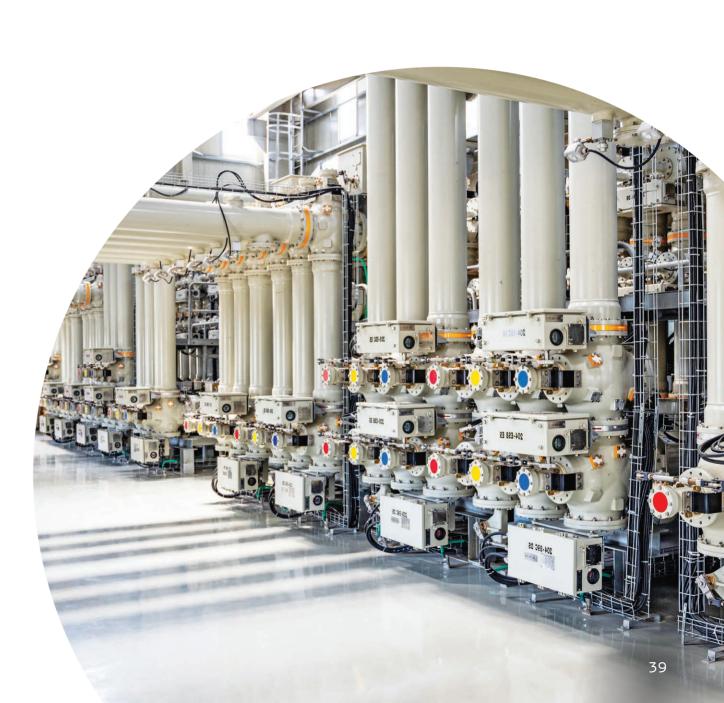
- Adani portfolio is one of the most dynamic infrastructure and utilities platforms with a significant expertise across the value chain for infrastructure development. Its operation and maintenance practices are benchmarked to global standards. It assists portfolio companies to execute projects efficiently with in-house resources.
- When financial support is provided by the parent company

to subsidiaries, the transfer price is determined considering factors like commercial expediency, envisaged cash flows, profitability, etc.

 Since Adani Group companies are built around adjacencies within businesses inter-se, there are synergies and business exigencies for inter-company flow of goods and services, leading to related party transactions.

AESL adopted a related party transaction policy, framed around the provisions of the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015 and Income-tax Act, 1961. The policy regulates related party transactions to ensure proper transaction approval, disclosure and reporting.

Based on this policy, the companies identify related party transactions and obtain approvals (e.g. Audit Committee) for these transactions. The Board of Directors reviews related party transactions and supporting documentation is provided to the Board of Directors to substantiate such transactions on an arm's-length principle and in the ordinary course of business.





#### Tax Governance

Our endeavour is to practice best-inclass tax governance. Our tax function is managed ethically and professionally by our proprietary tax team comprising dedicated professionals led by subject matter experts and supported by external tax specialists (whenever needed). This tax team has formulated standard operating procedures,

replicating international best practices with the objective to follow uniform and standardised procedures. The highest body for decision-making/overseeing tax aspects is the Board of Directors.

AESL's macro-level tax governance structure comprises:

- Board of Directors
- Audit Committee, Risk Management Committee,

Mergers & Acquisitions Committee, Legal, Regulatory and Tax Committee

- Group Chief Financial Officer/Group Financial and Management Controller
- Chief Financial Officer/ Financial Controller
- In-House Tax Team (dedicated tax professionals)

The periodic meetings of the Board of Directors review strategic tax matters. In the event of mergers and acquisitions, a due diligence exercise covers risk mitigation and certainty perspectives.

Board of Directors

Committees

CFO, Finance Controller

Tax Head

In-House Tax Team

## Legal, Regulatory & Tax Committee

- Exercise oversight with respect to the structure, operation and efficacy of the Company's compliance program.
- Review tax matters that may have a material impact on

AESL's financial statements and disclosures, reputational risk or business continuity risk.

- Review compliance with applicable laws and regulations.
- Review significant enquiries received from, and reviews by, regulators or government

agencies, including issues pertaining to compliance with various laws.

 Consider action tax risk management issues that are brought to the attention of the Committee.



#### In-House Tax Team

Adani Group has a top-notch dedicated tax team comprising senior tax professionals. This in-house team focusses on all facets of tax and reports to the Chief Financial Officer/Financial Controller on key aspects. AESL has its own finance and tax team, and this is supported by Adani Group's corporate tax team (both referred to as in-house tax team). The in-house tax team collaborates with businesses to provide sound tax advice regarding implications of business decisions/ agreements/transactions. On

account of interpretation issues with respect to tax laws, there could be an uncertainty or complexity regarding tax implications. In such a scenario, assistance is sought from external professional advisors and senior counsels (as required). A similar practice is also adopted for significant mergers and acquisitions undertaken.

AESL's robust framework addresses dynamic tax laws by focussing on training and updates of latest tax developments (judicial pronouncements). Regular tax updates from multiple sources and key updates are disseminated to

the relevant stakeholders internally (e.g., businesses), facilitating informed decision-making. The in-house tax team also participates in topical training (external seminars cum conferences as well as internal discussions).

The in-house tax team is responsible for the implementation of tax functions and principles by identifying, evaluating and advising on tax laws. This in-house tax team also focusses on building effective tax processes and bringing a uniformity in tax compliances.

#### Our tax risk management approach:



Headed by professional with 25+ years of experience



130+ dedicated tax professionals



Average 10+ years of experience



#### Tax Processes and Controls

Adani Group has robust processes and controls that address tax obligations, whether related to the payment of taxes or undertaking tax compliances. These processes comprise tracking and monitoring pending tax litigation and necessary compliances required to be legally undertaken. It also includes real-time status monitoring.

Standard operating procedures are

built for tax processes, with the objective to follow uniform and standardised procedures. From a control's perspective, the concept of checks and balances are in place (maker-reviewer-approver).



Comprehensive Tax Compliance Calendar



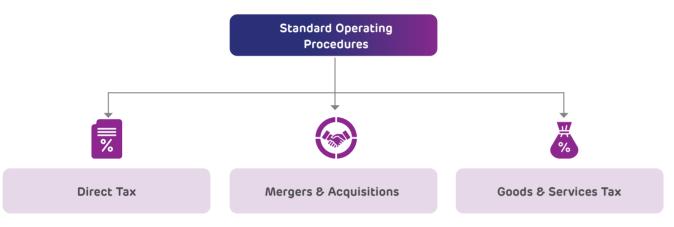
Maker-Reviewer-Approver Approach



Standard Operating Procedures

AESL increasingly leverages technology tools to supplement the human interface, helping automate tax processes. Extensive technology changes drive efficiencies related to tax aspects. A repository for the archival of historical and current tax data / documents has helped build a safeguard against subsequent data non-availability.

An internal audit covers tax, covering the effectiveness, efficiency and adequacy of internal control systems and adherence to various frameworks, policies and procedures.



#### Tax Technology

At Adani Group, we lead the way in innovation, embracing emerging technologies long before they become mainstream. Our proactive adoption of advanced tax technology reflects a strategic

commitment to elevating efficiency and compliance in managing our global tax responsibilities. By integrating state-of-the-art tax solutions, we streamline processes and optimise our tax strategies, setting the stage for

sustainable growth and securing a competitive edge. Adani Group's forward-thinking approach not only anticipates future trends but also drives our mission of operational excellence and leadership in the industry.

#### Illustrations of leveraging on tax technology:



Online income tax notice tracking



Automation in direct tax like withholding tax compliances, returns, etc.



Automation of lower withholding rate in SAP for vendors



Automated
GST ITC Reconciliation
process



#### **Advocacy**

AESL has developed an advocacy framework leading to a constructive and transparent dialogue with governments and policymakers across all tax facets (policy, legislation and administration). These advocacy initiatives are engaged either directly by AESL or through relevant industry

bodies with the objective of appropriate representation before the Government and policymakers on key tax issues / concerns that impact business or lead to unintended consequences.

AESL identifies issues impacting businesses on account of the changing landscape; it considers advocacy as an opportunity to present not only its concerns, but also partner with / represent the larger industry and engage with policymakers on key growth drivers for the country / industry.



#### Engaging with Tax Authorities

Our engagement with the tax authorities is transparent and co-operative. Our endeavour is to disclose relevant and complete facts to the tax authorities for their assessment. Our representations to the tax authorities are typically undertaken by the external professional advisors engaged by AESL, supported by

our proprietary tax team in line with our standard approach for representing / communicating with the tax authorities. AESL obtains withholding tax orders / other certificates from the tax authorities in advance, from a risk mitigation and certainty perspective.





## Our Contribution to the exchequer: Tax and Other Contributions

In the earlier section of this report, we outlined our approach to tax to share the organisation's perspective towards tax.

We also presented a summary of Tax and Other Contributions made to the Government, Ministries, Local Authorities, etc. ('exchequer') during the financial year 2023-24.

These Tax and Other Contributions are captured under the following categories:

- Direct contributions include payments made by AESL and its subsidiaries directly to the exchequer; these comprise corporate tax, indirect taxes borne, and other charges.
- Indirect contributions include payments by AESL and its subsidiaries on behalf of other stakeholders, such as withholding tax on vendor payments, withholding tax on payroll, Goods and Services Tax (GST) on outward supply & services, Electricity Duty etc.
- Other contributions comprise non-tax payments by AESL and its subsidiaries such as Provident Fund, and Labour Welfare Fund.

#### Tax and Other Contributions Overall Snapshot



#### State-wise Tax and Other Contributions (India Operations)

(₹ in mn)









104 Rajasthan





Uttar Pradesh





66 Bihar





Tamil Nadu





17 Uttarakhand



Andhra Pradesh





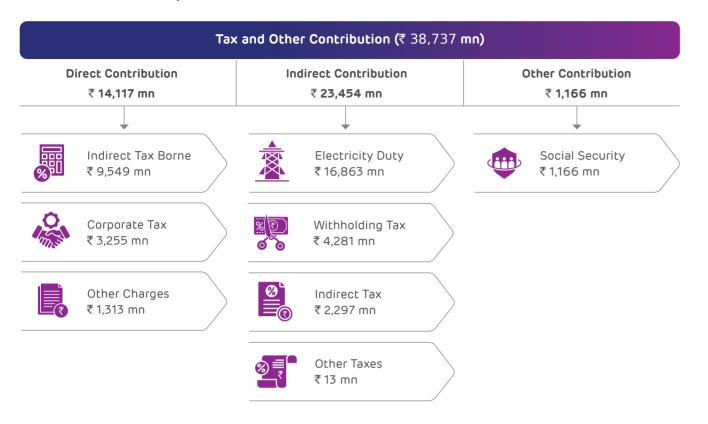




Chhattisgarh

Map not to scale (for representation purposes only)

#### Contribution-wise Snapshot





## The Basis of Preparation

This basis of preparation section provides the scope and methodology for the collection and reporting of data on the Tax & Other Contributions made directly and indirectly to the exchequer. Such data is reported in the section "Our Contribution to exchequer - Tax & Other Contributions".

The data reported is for the year from April 1, 2023 to March 31, 2024 and is based on the data used in the preparation of the Integrated Report for the year ended March 31, 2024. We have reported the Tax and Other Contributions on a cash basis, unless otherwise mentioned. The base information used to compute the Tax and Other Contributions is the same as that for the audited financial statements of respective companies with inherent differences in the accounting methodology.

We have categorised the Tax and Other Contributions into following parts:

- Direct contributions: It represents taxes, duties and other charges borne by AESL and its subsidiaries.
- Indirect contributions: It represents taxes and duties collected and paid on behalf of other stakeholders by AESL and its subsidiaries.
- Other contributions: It represents social security contributed for the benefit of the employees.

We have reported the Tax and Other Contributions to the exchequer, by AESL and its subsidiaries. In this context, the Tax and Other Contributions made by companies incorporated in India have only been considered for the purposes of this report as there are no operations of the Company outside India.

Such contributions are reported at gross amounts. We have also reported state-wise tax and other contributions made by AESL and its subsidiaries.

In addition to the above Tax and Other Contributions to the exchequer, we have also incurred social expenditures in the form of Corporate Social Responsibility (CSR) related contributions, which are not considered under this report as such amount are not paid to the exchequer.

The grouping of tax and other Contributions under the heads of 'Direct Contribution', 'Indirect Contribution' and 'Other Contribution' are based on our understanding of the nature of the payment and its payment mechanism.

#### 1. Direct Contribution

Corporate Tax on Income:
 This represents the actual

taxes paid directly on the taxable profits of AESL and its subsidiaries during the financial year 2023-24, including the taxes withheld by third parties while making payment to AESL and to its subsidiaries i.e., taxes withheld by the customers or taxes collected by the third-party vendors. State-wise contributions are determined based upon PAN (Permanent Account Number) jurisdiction of these entities for each state.

Since these taxes are reported on a cash basis, it may also include the tax paid in respect of the income tax liability for earlier years at respective corporate tax rates applicable for those years, if those were paid during the financial year 2023-24. Typically, these taxes would be reflected in

- corporate income tax returns made to Governments and tend to become payable, and are paid, either directly by way of advance tax or self-assessment tax or through credit of withholding tax, either in the year the profits were made or up to one year later.
- b. Indirect Tax Borne: This includes goods and services tax borne, customs duty borne, coal purchase related tax / cess / charges borne, etc. State-wise contributions for GST and Customs duty have been considered in the states where goods or services are consumed.
- c. Other Charges: This includes stamp duty, environmental contributions, licence fee, property tax and any other similar contribution by AESL and its subsidiaries. State-wise contributions have been considered in the state where other charges are paid by the Company.

#### 2. Indirect Contribution

#### a. Withholding Tax

- i. Suppliers and Vendors: These represent taxes withheld by AESL and its subsidiaries on various payments made to the suppliers and vendors and deposited with the exchequer on behalf of such suppliers and vendors.
- ii. Payroll Taxes: These represent taxes withheld from the salary payments made to the employees and deposited by AESL and its subsidiaries to the exchequer. Typically, these taxes would be reflected in payroll tax returns made to the exchequer and tend to

be payable, and are paid, on a periodic basis throughout the year.

We have presented state-wise contributions of these taxes according to TAN registrations of AESL and its subsidiaries under each state.

#### b. Indirect Tax:

This includes GST collected and paid to the exchequer on a gross basis. State-wise contributions have been determined based on the state in which the Company has paid the tax to the exchequer.

#### c. Electricity Duty:

This represents electricity duty and associated charges collected and paid to the exchequer. State-wise contributions have been determined based on the state in which the Company has paid the tax to the exchequer.

#### d. Other Taxes:

This includes professional tax withheld and deposited with the exchequer. State-wise contributions are determined based upon PAN jurisdiction of AESL and its subsidiaries for each state.

Refunds received, if any, have not been reduced for the purpose of Tax and Other Contributions. Separately, interest on tax is included in the Tax and Other Contributions, while penalty paid (if any) is not included. The withholding tax deducted on payments to group entities have been reported under indirect contributions and the corresponding pavees have reported the same under direct contributions as tax on its income.

#### 3. Other Contribution

contributions are obligatory payments to the exchequer that entitle employees to receive a future social benefit such as Provident Funds.

which are solely for the benefit of employees. State-wise contributions are determined based on registration in the state under relevant recognised authorities such as Employees Provident Fund Organization of AESL and its subsidiaries.

The amounts reported as Tax and Other Contributions are based on the periodic forms, returns, challans and other relevant documents filed with the exchequer.

An effort has been made to report various types of taxes, duties, levies and contributions. Any omission, inclusion or exclusion, other than that specifically mentioned, is unintentional and not expected to have any material impact on the disclosures.

Currency: Tax and Other Contributions disclosed in this report are in Indian National Rupees (INR) and are rounded-off to the nearest Million (mn).

Coverage: Please refer to Annexure 1 of the Report for list of taxes and other contributions covered and Annexure 2 of the Report for list of entities covered.



To

The Board of Directors of Adani Energy Solutions Limited,

Adani Corporate House, Shantigram, Near Vaishno Devi Circle, S. G. Highway, Khodiyar, Ahmedabad 382 421, Gujarat, India.

#### Report on the audit of the Tax and Other Contributions included in the Tax Transparency Report of Adani Energy Solutions Limited for the Financial Year 2023-24

We ('BDO India LLP' or 'BDO') were engaged by the management of Adani Energy Solutions Limited ('the Company') to report on 'Tax and Other Contributions' contained in the Tax Transparency Report of the Company and its subsidiaries for the financial year 2023-24, in the form of an independent reasonable assurance conclusion about whether Adani Energy Solutions Limited's statement that the Tax and Other Contributions is properly prepared, in all material respects, based on 'Basis of Preparation' attached to the Tax Transparency Report is fairly stated.

#### Management's Responsibility

The management of the Company is responsible for the preparation and presentation of the Tax and Other Contributions for the financial year 2023-24 in accordance with the 'Basis of Preparation' and for designing, implementing and maintaining such internal control as the management determines is necessary to enable the preparation and presentation of the Tax and Other Contributions for the financial year 2023-24 that is free from material misstatement,

whether due to fraud or error. The management of the Company is also responsible for preparing the Basis of Preparation.

In preparing the Tax and Other Contributions for the financial year 2023-24, 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.

## Independent Auditor's Responsibility

Our responsibility is to examine the Tax and Other Contributions prepared by the Company and to report thereon in the form of an independent reasonable assurance conclusion based on the evidence obtained. 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, which requires that we plan and perform our procedures to obtain reasonable assurance about whether the Tax and Other Contributions for the financial year 2023-24 is properly prepared and

free from material misstatement, whether due to fraud or error.

Reasonable assurance is less than absolute assurance and is not a guarantee that an audit conducted will always detect a material misstatement when it exists.

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which is founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

The procedures selected depend on our judgment, including the assessment of the risks of material misstatement of Tax and Other Contributions whether due to fraud or error. In making those risk assessments, we have considered internal control relevant to the preparation and presentation of Tax and Other Contributions in order to design assurance procedures that are appropriate in the circumstances, but not for the purposes of expressing a conclusion as to the effectiveness of the Company's internal control over the preparation and presentation of Tax and Other Contributions. Our engagement also included assessing the appropriateness of Tax and Other Contributions, the suitability of the Basis of Preparation used by the Company in preparing the Tax and Other Contributions in the circumstances of the engagement, evaluating the appropriateness of the procedures used in the preparation of Tax and Other Contributions and the reasonableness of estimates made by the Company and evaluating the



overall presentation of the Tax and Other Contributions.

#### Our Opinion

In our opinion, the Tax and Other Contributions for the financial year 2023-24 is properly prepared, in all material respects, in accordance with the 'Basis of Preparation'. Our opinion has been formed on the basis of, and is subject to, the matters outlined in this report.

This report is not issued under any statute / law.

#### Restriction on Use

In accordance with the terms of our engagement, this independent reasonable assurance report on Tax and Other Contributions has been prepared and issued at the request of AESL solely for inclusion in its Tax Transparency Report for the financial year 2023-24 and should not be used by any other person or for no 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 shared with us of AESL and are not the auditors of AESL 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 AESL 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 AESL on the basis that it shall not be copied, referred to or disclosed, in whole (save for inclusion in AESL's Tax Transparency Report) or in part, without our prior written consent.

For **BDO** India **LLP** 

Place: Ahmedabad

Date: November 23, 2024

#### Disclaimer

This voluntary report has been prepared by AESL considering best practices and to the best of our knowledge. This report is for information purposes only.

This report might contain statements that are forward-looking

in nature. All statements other than statements of historical fact could be deemed as forward-looking in nature. Such statements are inherently subject to risks and uncertainties, some of which cannot be predicted or quantified. By accessing or relying on this report, you acknowledge that you will be solely responsible for your own

assessment of the market and our market position and that you will conduct your own analysis and be solely responsible for forming your own view of the potential future performance of our business.

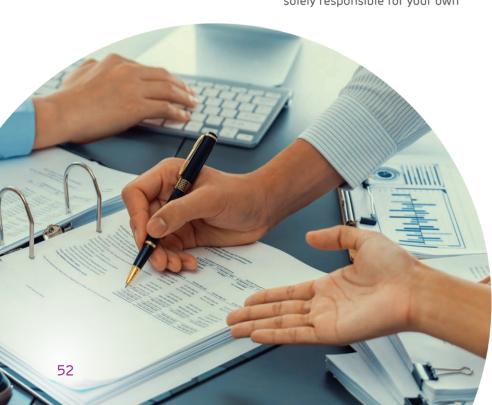
#### No duty to update

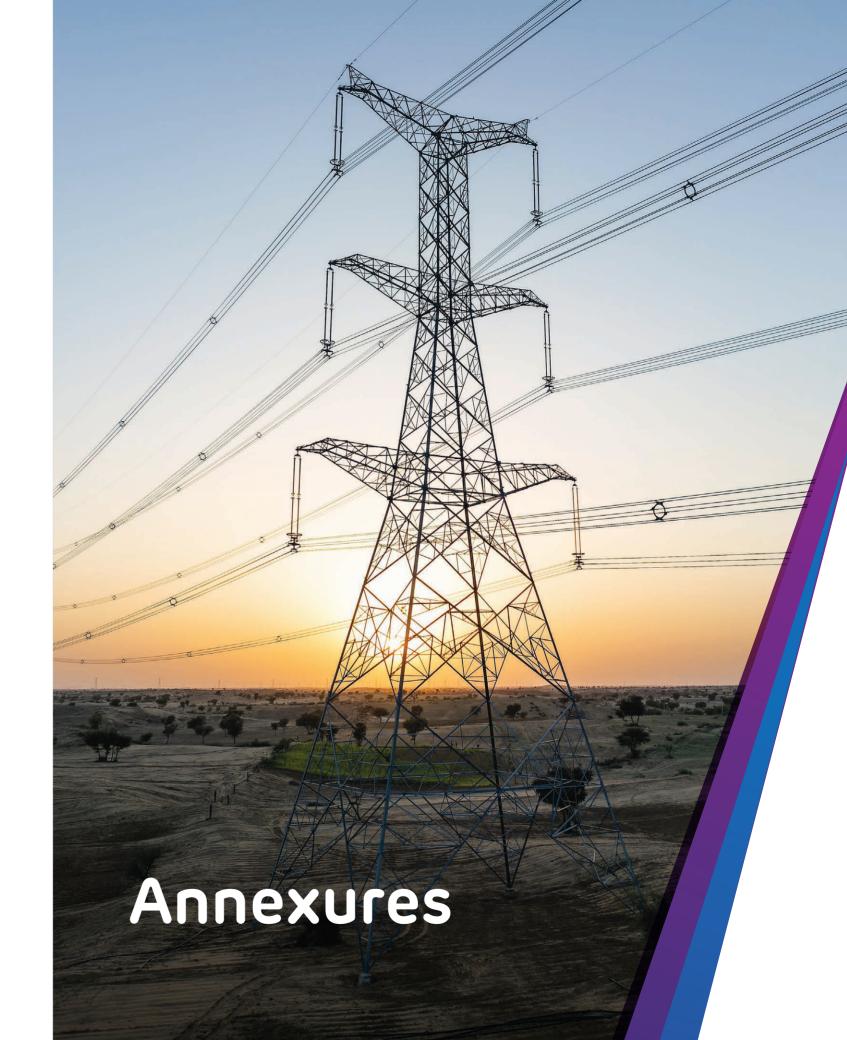
AESL assumes no obligation to update any information or forward-looking statement contained herein, save for any information we are required to disclose by law.

#### Our reporting ecosystem

We pay special attention to transparency and making content easy to find. This report is part of a broader reporting ecosystem which covers other topics relevant to Adani Portfolio companies. The publications include among others Integrated Report 2023-24.

All contents published is copyright of AESL and shall not be reproduced without the prior written permission of the Company.





#### Annexure 1

## List of Tax and Other Contributions Covered

Direct Contributions	Indirect Contributions	Other Contributions
<ul> <li>Corporate Income tax (including surcharge &amp; cess)</li> </ul>	<ul> <li>Withholding tax collected on salaries</li> </ul>	<ul> <li>Employer's and Employee's contribution to Provident Fund</li> </ul>
<ul> <li>Goods &amp; Services Tax (borne)</li> <li>Coal purchase related tax, cess &amp; statutory charges (borne)</li> <li>Licence and other fees payment</li> <li>Property tax</li> <li>Stamp duty</li> <li>Custom duty (borne)</li> <li>Entry tax</li> </ul>	<ul> <li>Withholding tax collected on vendor payments</li> <li>Tax collected at source on sale from customers</li> <li>Goods &amp; Services Tax (collected &amp; paid)</li> <li>Electricity duty (collected &amp; paid)</li> <li>Professional tax</li> <li>Equalization levy</li> </ul>	Employer's and Employee's contribution to Labour Welfare Fund

#### Annexure 2

## **List of Entities Covered**

Sr.	Name of the entity	Sr.	Name of the entity	Sr.	Name of the entity
1	Adani Energy Solutions Limited (formerly known as	11	Adani Green Energy Thirty Limited	22	Adani Transmission Step-Three Limited
	Adani Transmission Limited)	12	Adani Transmission (India)	23	Adani Transmission
2	Adani Cooling Solutions		Limited		Step-Two Limited
	Limited	13	Adani Transmission	24	AEML Seepz Limited
3	Adani Electricity Aurangabad		(Rajasthan) Limited	25	Alipurduar Transmission
	Limited	14	Adani Transmission Bikaner		Limited
4	Adani Electricity Jewar		Sikar Private Limited	26	Arasan Infra Limited
	Limited	15	Adani Transmission Mahan		(formerly Arasan Infra
5	Adani Electricity Mumbai		Limited		Private Limited)
	Infra Limited	16	Adani Transmission Step-	27	Arasan Infra Two Limited
6	Adani Electricity Mumbai		Eight Limited	28	Aravali Transmission Service
	Limited	17	Adani Transmission Step-Five		Company Limited
7	Adani Electricity Nashik		Limited	29	ATL HVDC Limited
	Limited	18	Adani Transmission	30	Barmer Power Transmission
8	Adani Electricity Navi		Step-Four Limited		Service Limited
	Mumbai Limited (formerly AEML Infrastructure Limited)	19	Adani Transmission	31	BEST Smart Metering Limited
9	Adani Energy Solutions Step-		Step-One Limited	32	Bikaner-Khetri Transmission
9	Thirteen Limited	20	Adani Transmission		Limited
10			Step-Seven Limited	33	Chhattisgarh-WR
10	Adani Energy Solutions Step- Twelve Limited	21	Adani Transmission Step-Six Limited		Transmission Limited
			•		

_	
Sr.	Name of the entity
34	Fatehgarh-Bhadla Transmission Limited
35	Ghatampur Transmission Limited
36	Hadoti Power Transmission Service Limited
37	Halvad Transmission Limited
38	Jam Khambaliya Transco Limited
39	Karur Transmission Limited
40	Kharghar Vikhroli Transmission Limited
41	Khavda II-A Transmission Limited
42	Khavda-Bhuj Transmission Limited
43	KPS 1 Transmission Limited
44	Lakadia Banaskantha Transco Limited

Sr.	Name of the entity	
45	Maharashtra Eastern Grid Power Transmission Company Limited	
46	Maru Transmission Service Company Limited	
47	MP Power Transmission Package-II Limited	
48	MPSEZ Utilities Limited	
49	NE Smart Metering Limited (formerly Adani Transmission Step Nine Limited)	
50	North Karanpura Transco Limited	
51	Obra-C Badaun Transmission Limited	
52	Power Distribution Services Limited	
53	Raipur-Rajnandgaon-Warora Transmission Limited	

Sr.	Name of the entity
54	Sangod Transmission Service Limited
55	Sipat Transmission Limited
56	Sunrays Infra Space Limited (formerly Sunrays Infra Space Private Limited)
57	Sunrays Infra Space Two Limited
58	Thar Power Transmission Service Limited
59	Warora Kurnool Transmission Limited
60	Western Transco Power Limited
61	Western Transmission (Gujarat) Limited
62	WRSR Power Transmission Limited
63	WRSS XXI (A)Transco Limited

