	Group Guidelines on Prevention of Sexual Harassment of Women at Workplace		
	Please also see:	Version	HRGPSHWW25
		Issue Date	1-Apr-25
		Effective Date	1-Apr-25
<i>This version supersedes all previous versions with a lesser version number</i>			

1. Background, Purpose & Objective:

1.1. Adani Group is an equal opportunity employer and treats all Employees and candidates equally and is committed to creating a healthy working environment free from discrimination on any ground and from harassment at work including Sexual Harassment. Thus, ensuring and enabling all Employees to work without fear of prejudice, gender bias and Sexual Harassment.

1.2. Sexual Harassment infringes the fundamental right of a person under Article 14 and 15 of the Constitution of India. Further, Article 21 of the Constitution of India guarantees right to life and to live life with dignity which includes right to a safe environment free from Sexual Harassment, The right to protection from Sexual Harassment and right to work with dignity are recognized as universal human rights by International Conventions, The Supreme Court of India had also laid down fundamental guidelines to address the issue of Sexual Harassment.

1.3. Adani Group will, not tolerate any form of Sexual Harassment, directly or indirectly, and is committed to take all necessary steps to ensure a Workplace free from any form of Sexual Harassment.


Sexual harassment at the Workplace, or other than workplace, if involving employees, is a grave and punishable offence. The Adani Group operates a zero- tolerance policy for any form of Sexual Harassment, deals with all incidents seriously and promptly investigates all allegations of Sexual Harassment. Any person found to have sexually harassed another shall face disciplinary action, to and including dismissal from employment.

1.4. The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (hereinafter referred to as "POSH Act") enjoins upon employers to lay down guidelines / policies for protection against sexual harassment of women at work place, directly or indirectly, and for prevention and redressal of complaints of sexual harassment and for matters connected with or incidental thereto.

1.5. Adani Group guidelines provide a platform for centralization of information / data on existing as well as formation of new Internal Complaint Committees as well as to oversee compliance with statutory requirements with respect to The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

To address any complaints of Sexual Harassment and ensure implementation of this Policy across all the locations of Adani Group, the following Committees are constituted:

- . Group Monitoring Committee a centralized redressal committee at Group level.
- . Internal Complaints Committee, (ICC) for each region/location

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2. Scope & Coverage:

The Policy is applicable to:

2.1 All employees / consultants / advisors / retainers of Adani Group including its subsidiaries, associates and affiliate companies.

2.2 All suppliers and clients of Adani Group e its subsidiaries Including their agents

2.3 All Third parties including their agents associated with Adani Group & its subsidiaries during all activities conducted at Workplace or all work related activities elsewhere.

Where Sexual Harassment occurs as a result of an act of commission or omission by any Third Party at their Workplace, Adani Group shall take all steps necessary and reasonable to assist the affected person/victim.

This policy is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

3. Definitions:

3.1 "Aggrieved Person" means in relation to a Workplace, any woman, of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent

3.2 "Committee(s)* means committee(s) formed by Adani Group far redressal of complaints of Sexual Harassment in accordance with the procedure laid down in this Policy.

3.3"Complaint" means and includes:

. any complaint (written or oral form) in the nature of Sexual Harassment made by an Aggrieved Person against any other Employee within Adani Group or any Third-Party having business dealings with Adani Group


.l Complaint by any other person not covered herein, can be considered only if made as per the procedure prescribed herein and as per the discretion of Committee.

3.4"Employer" means;

. In relation to any department, organization, undertaking, establishment. enterprise, institution, office, branch or unit. the head of that department, organization, undertaking, establishment, enterprise, institution, office, branch or unit:

. In any workplace not covered under (l) above, any person is responsible for the management, supervision or control of the workplace.

For the purposes of this definition "management*" Includes the person or board or committee (Including Group Committee) responsible for formulation and administration of policies related to prevention of sexual harassment at workplace.

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3.5 "Employee" would mean and include the following:

i)"Employee" used herein is to be strictly Interpreted in terms of and provisions of the POSH Act.

ii) For the purpose of this policy "Employee* means a person employed at a Workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker. probationer, deputation, trainee, apprentice or called by any other such name.

iii)This broad definition of "Employee used for the purpose of this policy cannot be used to claim the rights of an employee conferred by any other law of the land for the time being in force.

3.6 "Respondent means a person against whom the Aggrieved Person has made a Complaint.

3.7 "Sexual Harassment would mean and include, directly or indirectly, any of the following:

i)Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity:

ii)Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures. showing of pornography, lurid stares, including touching an employee's clothing, hair or body and/or touching or rubbing oneself sexually around another person or molestation, stalking, sounds including kissing sounds of smacking lips, display of pictures, signs including whistling, verbal or nonverbal communication which offends the individual's sensibilities and affects her/his performance:

iii)Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy:


iv)Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating for women employee and incudes implied or explicit threat about her present or future employment status as well as humiliating treatment likely to affect her health or safety

v)Any other unwelcome gesture by an employee having sexual overtones.

3.8 Third Party Includes any person not on the rolls of Adani Group but interacts with the employees such as consultants, retainers, customers, vendors, suppliers, contract workers, trainees or any outside visitor within or outside Adani Group

"Workplace would mean and include the following:

i)Any premises, locations, establishments, enterprises, institutions, offices, branches, or units established, owned, controlled by Adani Group

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ID - Any external location visited by the Employee arising out of or during employment including any mode of transportation provided by the Employer or use of public transport such as uber/ola etc. for undertaking a journey to and from the aforementioned locations.

4. Scope Of Group Monitoring Committee

A Committee at group level is formed to:

i) To provide a healthy and safe working environment at the Workplace which shall include safety from the persons coming into contact at the Workplace and further clearly display at any and all conspicuous places in the Workplace the penal consequences of Sexual Harassment Further, assist in designing required interventions for awareness and propagation of this policy at regular Intervals for sensitizing the Employees with the procedure and provisions of the Policy and Act

ii) Oversight and ensure the rightful implementation of the Policy at all locations /branches offices of all the verticals of the Adani Group. Further, provide required guidance / advice for continual compliance from time to time and necessary facilities to the Internal Complaints Committee (ICC) for dealing with the Complaint and conducting an inquiry.


iii) Monitor and review functions of Internal Complaints Committee (ICC) such as ensure the Complaints received have been redressed as per the policy without any deviation and further the Complaints which have been escalated are addressed promptly. Furthermore, provide an avenue for Aggrieved Person to register/ escalate their Complaints in case the same is not attended to by local ICC at an appropriate time.

iv) If it deems necessary may, suo moto, review an investigation / inquiry proceeding conducted by the Internal Complaints Committee (ICC) against Sexual Harassment and take any action as it may deem fit to protect and safeguard the interest and fairness of the redressal process.

5. Redressal And Enquiry Process:

i) The Committee shall be governed by provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 and any rules / amendments thereof, including Supreme Court Guidelines on the subject. Further it is to be noted that the entire Complaint procedure of redressal and enquiry has been already detailed and adopted by Internal Complaint Committees (ICC) for each region/location accordingly. [A copy of the entire Complaint procedure of redressal and enquiry detailed and adopted by Internal Complaint Committees (CC) for each region/location is marked and annexed as Annexure 1]

ii) A copy of the Complaint with all the annexures, the full inquiry report of the Complaint, post completion of investigation process along with its recommendations shall be made available by Internal Complaints Committee (ICC) to the Group Committee, wherever applicable, within 10 days of completion of inquiry/investigation.

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iii) Group Committee shall provide any other assistance, guidance and supervision, from time to time, as and when required to each and every Internal Complaints Committee (ICC) for a prompt and smooth redressal and enquiry procedure to be conducted in the most fair and just manner within the time frame and policy of the Adani Group.

iv) The Internal Complaints Committees (ICC) shall submit its final report on the investigation with recommendation for further action on the Complaint. The Group Committee upon receipt of such a report shall communicate to Internal Complaint Committees (CC) within 7 days its views to take final action against the Complaint.

v) The Group Committee may take up along with Internal Complaint Committees (ICC), at its discretion, any other Complaint(s) which are of grave and serious in nature requiring its immediate and direct involvement

6. Disciplinary Action for Sexual Harassment


The Committee shall recommend disciplinary action against Respondent, if found guilty, post completion of the investigation proceedings. The nature and severity of the disciplinary action will commensurate with the severity and persistence of misconduct. The disciplinary action includes but is not restricted to the below:

- i) Mandatory Written Apology accepting such action not to repeated in future towards any person.
- ii) Mandatory training or counselling session.
- iii) Letter of Warning that shall be marked in employee's employment record with the company.
- iv) Immediate transfer to a different department, location or both for either the aggrieved woman or the person against whom the complaint is made/ accused/ respondent.
- v) Withholding of promotion, increment, gratuity, incentives, bonus or all.
- vi) Demotion from the Respondent Employee's present grade.
- vii) Dismissal from service of the Company.
- viii) Any other action that the Committee deems reasonable.

7. Protection Against False Accusations

ix) False or malicious accusations of Sexual Harassment can have serious or disturbing effect on innocent Employees.

x) All Complaints made of Sexual Harassment should be factual and true. If after investigation it becomes clear that the Aggrieved Person or any other person making such Complaint, made false accusation including producing forged or misleading document) against the Respondent, the so-called Aggrieved person or any other person making the Complaint would become liable for appropriate disciplinary action.

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xi) A mere failure to substantiate a Complaint or provide adequate proof shall not attract action against the Aggrieved Person.

xii) The malicious intent on the part of the Aggrieved Person shall be established after an inquiry in accordance with the procedure prescribed by the Committee before any disciplinary action is recommended.

8. Protection Against Victimization/Retaliation

i) The Adani Group shall not accept, support nor tolerate victimization or retaliation measures of any kind against any person, who acts in good faith. reports acts of Sexual Harassments, It shall be considered and treated as a major misconduct.

ii) Any person who engages in such retaliation/ victimization, directly or indirectly or encourages others to do so, may be subject to appropriate disciplinary action.

iii) Victimization or Retaliation shall be treated as seriously as Sexual Harassment even if the original Sexual Harassment Complaint is not proven.

iv) Anyone feeling that a complaint of victimization or retaliation did not get a prompt response can raise a grievance with the Group Committee.

9. Confidentiality

It is to be noted that the Minutes of the Meeting of the Committees, the findings, recommendations, decisions of the Committees and any document or any verbal communication shall be kept strictly confidential and the members shall not divulge the details to any other Employee within or to any person outside the company.

Also, to other employees involved in such discussions, the members should emphasize the necessity for maintaining confidentiality and the consequences of possible disciplinary action in case of transgression