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		Original Issue Date:	01 April 2020
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		Version:	1.2
Adani Ports and Special Economic Zone Limited (APSEZ)			

Context & Purpose

Adani Ports & Special Economic Zone Limited (APSEZ) is committed to conduct its business with social responsibility and in compliance to the highest standards of business ethics. Organisation recognises the need to continuously impact society and environment, positively through its business endeavours. It upholds and protects human rights and personal security that is free from harassment or misuse of any kind. It promotes safe, clean and healthy workplace and living environment.

Employees of APSEZ carry several activities as part of their role and engage with internal & external stakeholders on continuous basis. While pursuing business imperatives, it is important for employees to maintain highest standards of corporate conduct, business ethics and protect human rights. 'Group Policy on Human Rights' has been enumerated in detail for Adani Group employees vide Policy Dt. 11/09/2018 HRP-HR. Provisions of Group Policy on Human Rights are applicable in totality to all employees of APSEZ as being integral part of Adani Group. These supplementary guidelines meant to address specific business context & requirements of APSEZ will have same effect with respect to applicability & enforcement as are the provisions of Group Policy on Human Rights.

APSEZ is committed towards protection of human rights of employees, associates, communities and those parts of its operations (including contractors and suppliers) in line with UN Guiding Principles on Business and Human Rights,

International Labour Organization Declaration on Fundamental Principles and Rights at Work and recognized frameworks and applicable laws and standards.

Scope


This policy applies to all employees, whether permanent, contract or temporary & other associates working for APSEZ and its' all other (Owned, Operated & Managed) entities. Supplier and vendors need to follow these guidelines, while dealing with ASPEZ.



Guiding Principles - Human Rights:

A. Community & Stakeholders Engagement

APSEZ has earned credibility & rightful place in neighbouring communities through its sustainability initiatives and programs meant to uplift quality and standards of life & livelihood. Organisation engages with communities on human rights matters that are important to them and involves with stakeholders in an inclusive, transparent and culturally appropriate manner on

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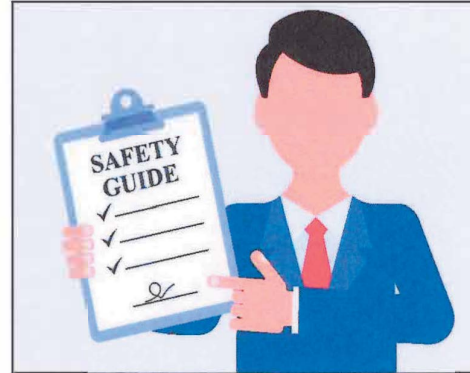
human rights concerns related to its business activities.

The reorganization process is undertaken with sensitivity, strategy, and foresight. A reorganization plan is prepared in concurrence with the relevant stakeholders at the time of acquisition, mergers, or expansions.

B. Prohibition of child labour and forced labour APSEZ operates within well-established corporate governance framework of Adani Group, which emanates from its vision and values. There is zero tolerance policy towards all forms & facets of modern slavery. Organisation's corporate governance framework prohibits all forms of bonded labour, child labour, forced labour, human trafficking, or any other form of modern slavery.

C. Safety & Wellness

APSEZ is committed to ensure a safe, healthy and hygienic environment to all its employees and associates. All managers and leaders are responsible to conduct operations in a manner safe for human life, which eliminates or minimizes adverse environmental impact. Provisions of systems and processes meant to prevent all possible accidents, incidents, injuries and occupational illness are to be fully complied by all Employees and Associates.



Organization will continue to create awareness among employees, associates through campaigns & training programs on adherence to work place practices expected from them. Employees are responsible to comply with environment, health and safety policy of the Company. Concerted efforts will continue to collectively enhance employee wellness standards, create and maintain a safe workplace.

D. Workplace Security

APSEZ continues to maintain a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions. Security safeguards are provided for employee privacy and dignity. Head of every establishment is responsible to maintain standard safeguards and deal with exceptions through observation and reporting. Special measures and programs for safety & wellbeing of diversity workforce will continue to be implemented at all locations.

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E. Freedom of Association & Right to Collective Bargaining

Rights of employees & associates to exercise freedom of expression in course of their work is to be respected and encouraged to create a truly enabling environment. For bargainable segment of workforce, right of association, negotiation and collective bargaining is well recognized and protected under Constitution of India in the Trade Union Act. Organisation will continue to respect the right of workers to form and join a trade union of their choice without fear of intimidation or reprisal, in accordance with law.



F. Diversity and Equal Opportunity

APSEZ workforce operating across

different locations is expected to live up to its commitment to diversity at workplace and provide equal opportunities to everyone based solely on merit and ability. Policies are in place to ensure that work environment across APSEZ is free from discrimination in any form, whether caste, religion, disability, gender, sexual orientation, race, colour, origin, marital status or affiliation with a political, religious or union organization or belonging to majority / minority group. In the event of sexual harassment or any other offensive conduct, processes and mechanisms instituted for the purpose are to be initiated and completed.


G. Transparent and Inclusive Workplace

Organisation will continue with its strive to create, maintain & enhance standards of a truly transparent and inclusive workplace which assimilates diversity and people from different backgrounds contribute towards common business goals. Confluence of organisation goals and individual interests to harness full potential of people will continue to be pursued.

H. Human Rights Due Diligence

APSEZ recognizes that human rights due diligence is an ongoing process that requires particular attention at various stages in business activities, such as when new partnerships are formed or during change in operating conditions, as these changes may create new potential or actual impacts on human rights.

APSEZ will continue to conduct human rights due diligence to identify such risks

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so as to avoid, prevent, mitigate and account them. Organization will publish relevant reports providing insights as also actions taken as a consequence of such due diligence. Based on requirement, organizations may periodically publish parts of due diligence report as relevant.

I. Equal Remuneration

Equal remuneration for all workers for work of equal value, without discrimination based on their gender, age, disability, ethnicity, sexual orientation, family status and religious beliefs.

J. Non Harassment

Harassment is verbal or physical conduct designed to threaten, intimidate, or coerce. *Sexual harassment* consists of unwelcome sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature. Harassment can be: Verbal and Non-Verbal. APSEZ have zero tolerance towards any form of harassment i.e., sexual harassment and non-sexual harassment.

The workforce at all locations and at all levels of the Company have the responsibility to avoid any act or actions, implied or explicit, that may suggest any form of harassment of any other person within the workplace, or in a work setting.

K. Data Privacy

APSEZ is committed to upholding data privacy as a fundamental human right. Information pertaining to individuals is accessible on need- to-know basis to key

personnel who are designated for specific tasks.

L. Rehabilitation & Resettlement

APSEZ seeks to avoid involuntary resettlements of communities or individuals. In situations where it is unavoidable, we commit to comply with applicable laws of land. APSEZ respects rights of indigenous communities as per applicable national and emerging international standards.

M. Grievance Redressal

APSEZ recognizes that an empowered workforce is key to identify, prevent and mitigate any potential or actual human right risks. Stakeholders can raise concerns pertaining to human rights issues as per Whistleblower Policy or by using online grievance management system available on Company website or by directly reaching to the Grievance redressal team through dedicated email [-grievance.apsez@adani.com](mailto:grievance.apsez@adani.com).

Organization does not impede access to state-based judicial processes.

N. Training

Relevant guidelines pertaining to human rights are defined and uploaded on company website for easy access to all employees and stakeholders. Organization conducts awareness and familiarization sessions for different sets of employee population as required.

O. Adherence and Implementation

Responsibility for implementation of these guidelines is with most senior executive responsible for each business segment and HR Team. These

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executives will report any potential or actual human rights concerns arising within operations to HR Head. Employees and other associates are responsible to comply with and uphold the provisions of this policy in fulfilment of organisation's commitment towards protection of human rights and its various dimensions. Managers & organisational leaders are responsible to ensure through initiatives & programs that provisions contained in this policy are implemented within their work area. This ensures that every part of business is clear about responsibility to respect human rights. Exceptions need to be addressed as per standard procedures. Violation of this policy or the refusal to cooperate will result in disciplinary action and shall be referred to the appropriate authorities.

P. Governance and Accountability

At Board level, Stakeholders' Relationship Committee ensures the strategic alignment of sustainability and human rights with the business. Risk Management Committee oversee the potential and actual risk pertaining to human rights at every stage of the project including merger and acquisition through human rights due diligence. Ultimate oversight for human rights resides with Board of Directors which are briefed on quarterly basis by the ESG Head.

Q. Community, Health, Safety & Security

The APSEZ ensures that the health, safety, and security of communities in our

landscapes are respected and protected. Health risks may include: communicable diseases; mental health due to harassment; community wellbeing (including cultural aspects – monuments, archaeological sites, sacred sites, pastoral, tribal sites). Safety risks are unintended threats to people and may include: natural hazards; impacts of climate change; dangerous working conditions. Security risks are intended or deliberate threats to people and may include: physical violence; gender-based violence; sexual exploitation and abuse. APSEZ, its subsidiaries and joint ventures, are committed to following objectives:

- To anticipate and avoid adverse impacts on the health and safety of the Affected Community during the project life from both routine and non-routine circumstances
- To ensure that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimizes risks to the Affected Communities
- To ensure that the security personnel should be provided in a manner that does not jeopardize the community's safety and security, or the APSEZ relationship with the community
- To identify the risks and impacts on community health, safety, and security, which requires further assessment, and development of an action plan (i.e., a Community Health, Safety and Security Plan) to

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minimize or eliminate the negative impact risks

- The implementation of the actions necessary to meet the requirements of this Policy shall be managed through the Environmental and Social Management System
- To ensure the design, construct, operate, and decommission of the structural elements or components of the project are carried out considering engineering safety competencies and risks to third parties or Affected Communities
- To avoid or minimize the potential for community exposure to hazardous materials and substances that may be released by the operations; the APSEZ will exercise special care to avoid or minimize the exposure by modifying, substituting, or eliminating the condition or material causing the potential hazards
- To provide the ecosystem services in case the operation/projects have significant changes to the physical environment which may results in health & safety risks & impacts to affected communities
- To avoid or minimize the potential for community exposure to water-borne, water-based, food-borne, and vector-borne diseases, and other communicable diseases that could result from operational activities, taking into consideration differentiated exposure to and

higher sensitivity of vulnerable groups


- Formulate emergency preparedness & response plans to manage all identified emergencies in collaboration with the Affected Communities, local government agencies and other relevant parties
- To ensure the retention of direct or contracted workers to provide security to safeguard its personnel and property and to assess risks posed by its security arrangements to those within and outside the operation site
- To ensure security against intended or deliberate threats to people like physical violence; gender-based violence; sexual exploitation and abuse.
- To record and investigate all the incidents and identify any necessary corrective or preventive actions needs to be taken related to the security operations

R. Reporting

APSEZ publicly discloses the performance of these processes in our Annual Disclosures or as and when needed through appropriate mediums.

S. Extension

This guideline should be followed in conjunction with other available policies or guidelines like Supplier Code of Conduct, Anti- Bribery & Anti-Corruption guidelines, Code of Conduct guidelines, Prevention of Sexual Harassment at

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Workplace, Diversity & Inclusion guidelines, Whistleblower policy and Stakeholder Engagement policy. This guideline shall be reviewed periodically for its appropriateness and updated as necessary.



Karan Adani
Whole-Time Director & CEO