

ADANI POWER LIMITED (“APL”)

Supplier Code of Conduct

1. Introduction

Adani Power Limited (APL) considers suppliers as business partners. This Code of Conduct is to establish collaboration with our suppliers in the promotion of lawful, professional and fair business practices that integrates respect of human rights, business ethics and environment.

APL is committed for responsible business practices in the areas of human rights, labour, environment, and business ethics.

2. Applicability

This Supplier Code of Conduct is applicable to all our Suppliers globally. Here, “Supplier” refers to material suppliers/ service providers/ vendors/ traders/ agents/ consultants/ contractors / third parties including their employees, agents and other representatives, who have a business relationship with and provide, sell, seek to sell, any kinds of goods or services to APL or any of its subsidiaries and associated entities (hereafter referred as “APL”).

The Supplier shall communicate the code to related entities and subcontractors who support them in delivering materials or services and ensure adherence from all related entities and subcontractors.

3. Guidelines on Code

- **Regulatory Compliance:** The Supplier shall ensure to comply with all applicable laws and regulations in all the territories it operates.
- **Freely Chosen Employment:** The Supplier shall ensure to hire all their employees on their own free will; and all their operations are

free from child, forced, and bonded labour or any other form of compulsory labour or slavery.

- **Equal Opportunity:** The Supplier shall ensure to provide equal employment opportunities and conducive environment to all its employees for their growth without any discrimination and harassment.
- **Working Hours, Wages and Benefits:** The Supplier shall comply with all applicable laws and regulations with respect to working hours, minimum wages, employing labour, including those pertaining to women and children. The Supplier shall treat their employees with respect and dignity.
- **Human Trafficking:** The Supplier shall ensure to comply with all anti- human trafficking laws internally and across their supply chains.
- **Freedom of Association:** The supplier must be committed to uphold freedom of association, right to collective bargaining to safeguard employee and worker integrity; and committed to open and constructive dialogue in accordance with local law.
- **Health and Safety:**
 - The Supplier shall ensure to provide safe working environment to its employees/ workers.
 - The Supplier shall ensure to take necessary precautionary safety measures and design processes against potential accidents and occupational hazards.
 - The Supplier shall ensure to meet general principles of health and safety risk prevention while products and services delivery. General principles include identifying, minimizing and preventing hazards using competent and trained people; maintaining safe equipment and tools; providing personal protective equipment as required.
 - The Suppliers shall ensure to impart adequate training to all employees, workers/ contractors on health and safety issues.
 - The Supplier shall ensure to provide safe, clean and secure

accommodations to their employees, if applicable.

- **Environment Management:**
 - The Supplier shall ensure environmental sustainability regarding minimising the GHG emissions and reducing energy consumption.
 - The Supplier shall commit to protect and promote natural habitats, biodiversity, management of soil to avoid loss of nutrients, land pollution; and optimize the processes to conserve natural resources and reduce the release of harmful emissions to the environment.
 - The Supplier shall undertake initiatives on continuous basis to promote environmental responsibilities and encourage environment friendly processes and technologies.
 - The Supplier shall ensure to comply all laws pertaining to sustainability, pollution, environment protection etc. as applicable.
 - The Supplier shall ensure to manage wastes of any form – hazardous, nonhazardous, industrial, solid/ liquid/ gaseous as per the prevailing/ recommended laws.
- **Subcontracting:** The Supplier shall not use any subcontractor in connection with any APL business unless subcontractor abides by the same conditions as put forth by APL. The Supplier shall submit declaration with list of subcontractors to APL prior to commencement of work. APL must be notified immediately in case of any changes in subcontracting.
- **Adherence with Company Policy:** The Supplier shall follow all contract conditions and other applicable policies of the Company while executing any work at APL Company sites.
- **Bribery or Corruption:** The Supplier shall not offer or accept bribes or other unlawful incentives to/from their business partners.

- **Conflict of Interest:** The Supplier shall not take advantage of any family/ social/ political connections to obtain favorable treatment that creates any actual or potential conflict of interest.
- **Grievance Redressal:** The Supplier shall ensure that any worker/ employee, acting individually or with other workers, can submit grievance and an effective grievance procedure should be established for its redressal.
- **Reporting of Unethical Practices:** The Supplier shall report any unethical activity or discrimination if practiced by any of APL employee/ other supplier as per the whistle-blower policy. The policy is uploaded on the Company website(https://www.adanipower.com/-/media/Project/Power/Investors/Corporate-Governance/Policies/APL_Whistle_Blower_Policy_06_02_2019.pdf).
- **Ethical Competition:** The Supplier must strictly adhere to antitrust and competition laws, refraining from any anti-competitive practices, whether independently or in collaboration with other entities.
- **Intellectual Property:** The Supplier shall ensure that all employees' and business partners' privacy and intellectual property rights which includes protection against disclosures, patents, copyrights and trademarks are protected
- **Third Party Representation:** The Suppliers shall not be authorized to represent APL or to use APL brands without written permission from APL. Third parties and their employees who are authorized to represent APL are expected to abide by provision in the non-disclosure agreement to be signed by them.
- **Prohibition on Insider Trading:** The Suppliers and their personnel shall not use any material or non-publicly disclosed information for trading of APL securities or enabling others for the same.

4. Supplier Evaluation

APL has set specific supplier expectation regarding supplier performance with the Code. APL will continue to evaluate the Suppliers taking into consideration the ability to meet the objective and expectations of this Code.

5. Continuous Improvement

Where applicable, APL will support Suppliers in the establishment of best practices in order to meet and exceed the standards outlined in the Code.

6. Acceptance

By signing the purchase order/ contract/ agreement copy the Supplier acknowledges having read, understood and accepted the guidelines as described in the Supplier Code of Conduct. The Suppliers are expected to fulfill the aforementioned key elements by incorporating them in their own business practices.

Please contact suppliercoc@adani.com if you have any questions about this Code.