

**SUPPLIER CODE OF CONDUCT**

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## 1. ABOUT OUR SUPPLIER CODE

ACX is a leading data center operator. In addition to offering quality services and generating financial value for our shareholders, we are committed to operating to the highest ethical standards. We expect our suppliers and sub-contractors to meet the same standards.

This Supplier Code of Conduct (the **Code**) sets out the minimum standards of behavior that we require from you as a supplier of the ACX Group. You must comply with these standards and ensure that your sub-contractors do the same.

We may need to review your business practices so that we can be assured that they meet the standards set out in this Code. To enable this, we may also require you to provide us with appropriate and reasonable access to your business standards and relevant supporting information.

## 2. WHO DOES THIS CODE APPLY TO?

This Code applies to our suppliers and to sub-contractors appointed by our suppliers in order to fulfil any obligations to the ACX Group. Our suppliers are individuals and organisations who supply goods and/or services to the ACX Group or to another individual or organisation acting on behalf of the ACX Group. We refer to any such individuals and organisation as our **Suppliers** in this Code. Sub-contractors are only required to comply with this Code to the extent that their work is connected to the ACX Group.

The **ACX Group** means AdaniConneX Private Limited (**ACX**) and any subsidiary of ACX.

## 3. OUR EXPECTATIONS AND STANDARDS

### 3.1 Business compliance and ethics

You must comply with all applicable laws and regulations in the jurisdictions in which you operate or conduct business.

We also expect you to comply with the highest ethical and operational standards so as not to harm others or the reputation of the ACX Group. Ensuring that we have transparent and ethical supply chains is of utmost importance to our business.

Suppliers are expected to manage any sub-contractors and ensure that they fully comply with this Code.

#### *Anti-bribery, corruption and fraud*

We do not tolerate any form of bribery, corruption or fraud.

You must comply with all applicable bribery and corruption laws, regulations and standards. You must always behave ethically when acting for and on behalf of the ACX Group.

In particular, you must not:

- (a) offer, promise, give, ask for or receive a bribe or any other improper payment or advantage;
- (b) make a facilitation payment (being a payment to any government entity or public official to expedite or secure the performance of a routine government action that is not expressly provided for by law), except where making such a payment is necessary to avoid risk to life or personal injury; or

- (c) make any payments to public officials, politicians, political candidates, political parties or political party officials. You should disclose to us any close connections you have with the same.

We also expect you to have and maintain comprehensive policies and internal procedures to manage bribery, corruption, and fraud-related risks in your business effectively.

### ***Gifts and entertainment***

Reasonable and proportionate gifts, hospitality and entertainment can be a legitimate part of doing business. However, before offering or accepting any gifts, hospitality or entertainment, you must ensure that they are lawful, appropriate and will not unduly influence the business relationship or any associated decision-making.

In particular, you should not offer, seek or receive, in connection with the ACX Group's business, any:

- (a) gifts, hospitality or entertainment to or from any public officials, politicians, political candidates or political party officials;
- (b) gifts that are cash or cash equivalents (for example a voucher or gift card); or
- (c) gifts, hospitality or entertainment during an open bidding process involving anyone concerned with the procurement process.

### ***Sanctions and trade controls***

You must comply fully with all applicable Sanctions and trade control-related laws and regulations.

You must not conduct business with any Sanctioned Persons, nor transact with any Sanctioned Country in connection with the ACX Group's business, unless you have received prior written consent from the ACX Group's Compliance Officer.

You must never act in a way that puts any member of the ACX Group or its personnel in breach of Sanctions.

For the purposes of this Code:

- (a) **Sanctions** means any trade, economic or financial sanctions laws, regulations, embargoes, and restrictive measures administered, enacted or enforced by the United Nations, the United States, the European Union, the United Kingdom, the Republic of India and/or any other applicable country;
- (b) **Sanctioned Countries** are countries and/or territories which are subject to comprehensive country- and/or territory-wide Sanctions; and
- (c) **Sanctioned Persons** are persons, entities or any other parties:
  - (i) located, domiciled, resident or incorporated in **Sanctioned Countries**;
  - (ii) targeted by any **Sanctions** administered by the United Nations, the United States, the European Union, the United Kingdom, the Republic of India and/or any other applicable country; and/or
  - (iii) owned or controlled by or affiliated with persons, entities or any other parties as referred to in (i) and (ii) above.

### ***Competition***

You must comply fully with all applicable antitrust/competition laws as they apply to the ACX Group and your own business. For instance, you must not fix prices, share the ACX Group's commercially sensitive information, co-ordinate market activity or otherwise attempt to prevent, restrict or distort competition.

### ***Money laundering and terrorist financing***

You must not engage in and/or facilitate money laundering and/or terrorist financing in any way whatsoever. You are to have appropriate due diligence processes in place so that you engage with reputable counterparties only (including sub-contractors) and follow robust processes to prevent and detect any illegal payments or illegitimate business activities or transactions.

### ***Conflicts of interest***

You must avoid any activity that creates any actual, potential or perceived conflict of interest between you and us, or otherwise in relation to our business relationship. You must inform us of any such conflict, for example, if there is a personal connection between individuals in our respective organizations.

## **3.2 Environmental and social matters**

### ***Human rights***

You must uphold and respect fundamental human rights principles as set out in the International Bill of Human Rights, the fundamental International Labour Organization Conventions and such other international conventions or protocols on human rights that the Republic of India is a signatory to. Where there is a conflict in human rights standards, the most stringent standard that provides the most protection to workers will prevail. You must avoid any activity that causes adverse human rights impacts, including indirectly in your supply chain. When any such impacts occur, you must take steps to remediate them and implement corrective action to prevent further impacts.

You must not subject your employees to harassment (including physical, verbal, sexual, emotional or psychological harassment), violence, or threats of violence or discrimination.

You must comply with all applicable laws and regulations in relation to working hours and overtime. All employees and workers must be paid wages at least equivalent to the statutory minimum or, where there is no such minimum, the prevailing industry amount. You must otherwise comply with all other applicable compensation laws and regulations, including in relation to overtime payments, benefits, pension payments and allowances.

### ***Forced Labour, Bonded labour, child labour and human trafficking***

We have zero tolerance for any form of forced labour, bonded labour, child labour and human trafficking within our supply chain. This includes slave labour, indentured servitude and prison labour.

All of your employees and workers must provide their services willingly and without threat of penalty. They must not be coerced to work through the use of physical or sexual violence, threats, intimidation, manipulated or fraudulent debt, retention of identity papers (including passports) and/or withholding of wages. All of your employees and workers must be permitted to freely move and not be required to work to pay off a debt.

You must not have any instances of child labour in your operations. All of your employees and workers must not be deprived of the opportunity to attend school and must not be obliged to leave school prematurely. You will not employ or engage persons under the age of 16 years old or under the legal employment age in the country where you operate, whichever is the higher.

You must not have any instances of human trafficking within your business. All of your employees or workers must have been recruited fairly and in accordance with laws and not subject to any threats, force, coercion, abduction, fraud or deception.

You must require that business partners and others in your supply chain do not use forced or child labour or engage in human trafficking. Further, you must have systems in place to ensure that any sub-contractors you appoint to fulfil any obligations to the ACX Group do not employ the use of forced labour, child labour or human trafficking, including the use of contractual requirements and annual certifications of compliance.

### ***Workplace health and safety***

You must comply with all applicable health and safety laws and with the terms and conditions of all health and safety permits required for your operations. You must maintain workplaces that protect the health, safety and wellbeing of your employees and workers.

You must have effective systems in place to ensure that all health and safety hazards, including in relation to fire, hazardous substances and materials, infection and disease and equipment or machinery malfunction, are identified and adequately mitigated and managed. All employees and workers must be appropriately trained on health and safety matters relevant to their role.

### ***Environmental compliance***

You must comply with all applicable environmental laws and with the terms and conditions of all environmental permits required for your operations. You must have effective systems in place to ensure that all environmental risks and impacts, including in relation to hazardous substances and materials, waste and emissions to water, land or air are identified and adequately mitigated and managed. All employees and workers must be appropriately trained on environmental matters relevant to their role.

ESG Requirements:

To align with our ESG philosophy, we expect our suppliers and service providers to adhere to the following requirements:

#### **Environment**

- Obtain and maintain all necessary environmental permits and licenses.
- Implement measures to reduce, reuse, and recycle waste and water.
- Ensure safe handling, storage, and disposal of hazardous materials.
- Prevent pollution and minimize environmental impact through sustainable practices.

#### **Social**

- Prohibit child labor, forced labor, and any form of discrimination or harassment.
- Ensure fair wages, reasonable working hours, and safe working conditions.
- Provide appropriate health and hygiene facilities and personal protective equipment.
- Promote diversity, equity, and inclusion within the workforce.

#### **Governance**

- Comply with all applicable laws, regulations, and industry standards.
- Maintain transparency and accountability in business operations.
- Implement a grievance redressal mechanism for all stakeholders.

- Obtain relevant certifications such as ISO 9001, ISO 14001, SA8000, etc. as per applicability.

“It is expected that you may adopt applicable ESG KPIs and set targets to ensure that our ESG philosophy is disseminated in our value chain.”

“To ensure that our value chain partners are aligned with our overall ESG targets, periodic reviews may be conducted to take corrective and preventive measures”

### 3.3 **Operational Requirements**

#### ***Books and records***

You must maintain accurate and transparent books, records and accounts and you must demonstrate compliance with applicable accounting and record-keeping laws and regulations. You should monitor and report internally any irregular payments, suspicious transactions or suspected money laundering.

#### ***Audits and assessments***

You must cooperate with internal and external investigators and auditors. Unless prohibited by law, such investigators and auditors must notify the ACX Group’s Compliance Officer of any investigation, audit, assessment or irregular request that relates to the ACX Group. Upon request, you must also allow us (and any appointed external representatives) to inspect and audit your books and records. When necessary, we may also conduct operational audits.

#### ***Confidential information***

You must safeguard any confidential information, intellectual property and personal data that you receive through our business relationship. You must comply with all applicable data protection,

privacy and security laws and regulations. You must never disclose or share any confidential or personal information relating to the ACX Group or its personnel without our prior written consent.

We expect you have implemented internal systems and processes to keep information secure and accessible only to those with a legitimate need to access such information. You must not seek to obtain insider, material or confidential information derived from our competitors or other third parties.

***Co-operation***

You must be alert to any possible violations of the law or this Code in the context of our business relationship and you are to notify the ACX Group’s Compliance Officer of any such concerns. Unless prohibited by law, you must immediately inform the Compliance Office if you are notified or become aware of any investigation, claim or other inquiry that involves the ACX Group or its personnel. You must promptly notify us if you become subject to any material criminal, civil or administrative legal action.

We expect you to respond transparently to any reasonable request we make for you to demonstrate your compliance with this Code and to assist us with any investigations related to your compliance with this Code.

**4. REPORTING**

If you have any concerns over any actual or suspected violations of this Code, or the conduct of any of your sub-contractors or ACX personnel, you should refer these to the ACX Group’s Compliance Officer as soon as possible by email at [compliance.adaniconnex@adani.com](mailto:compliance.adaniconnex@adani.com).

We will investigate any concerns raised. If we believe that you are not complying with the standards set out in this Code, we will seek to discuss the issue with you in the first instance. If remedial actions are required, we expect you to implement such actions promptly and effectively.

You must never take any retaliatory action against anyone who reports any concerns to the ACX Group in good faith.

**5. NON-COMPLIANCE**

We take any breaches of this Code seriously. We may consider any non-compliance to be a material breach of contract and we reserve the right to end our business relationship with you in such circumstances.

**6. UPDATES**

We may update this Code from time to time. It is your responsibility to ensure that you read, understand and comply with the current version of this Code.

**7. REVISION HISTORY**

Issue No	Version No	Issue Date	Summary of Changes
1	1.0	April 2022	Initial Document