

Environment, Social & Governance Policy

Introduction

AdaniConneX is committed towards the Adani Group's vision of "Growth with Goodness". We believe that the long-term success of our business depends on our ability to integrate sustainability into our operations, respond effectively to environmental challenges and contribute positively to our employees, communities and other stakeholders. This ESG Policy outlines the commitments and frameworks that guide AdaniConneX's approach to sustainable and responsible business conduct.

Commitment

AdaniConneX shall endeavour to demonstrate sustainability leadership across its operations by embedding ESG considerations into business strategy, risk management, operational decision-making and stakeholder engagement. To achieve this, AdaniConneX will:

- Ensure compliance with all applicable laws, regulations and internal requirements, while striving to go beyond compliance through responsible and sustainable business practices that safeguard people, host communities and the environment.
- Practice energy conservation and continuously improve operational energy efficiency through innovative technologies, efficient infrastructure design and optimisation of Power Usage Effectiveness (PUE) across facilities and operations.
- Advance the transition towards a low-carbon future by increasing the procurement and utilisation of renewable energy sources, while implementing a long-term decarbonisation roadmap to reduce dependence on fossil-fuel-based energy.
- Promote responsible resource management by implementing technologies, management systems and operational practices that reduce water consumption, minimise waste generation, ensure safe management of hazardous waste and support circular economy principles through reuse, recycling and resource recovery initiatives
- Continuously strengthen the EHS management system by fostering a zero-harm culture through robust safety practices, active worker consultation and participation, and ongoing training and awareness programmes to maintain safe and healthy workplaces.
- Foster an inclusive, equitable and high-performing workplace culture by investing in employee development, continuous learning, capability building, fair labour practices, equal opportunity and merit-based growth and advancement.
- Respect and uphold internationally recognised human rights standards and principles (such as UNHRC, UNGC etc) across all operations, supply chains and business relationships, while ensuring compliance with applicable labour laws, ethical employment practices and principles of dignity, equality and respect for all individuals
- Contribute to the sustainable development and well-being of local communities through meaningful stakeholder engagement, social investment initiatives and programmes that create long-term positive social, economic and environmental value
- Adhere to the highest standards of corporate governance by maintaining robust internal controls, transparent reporting mechanisms, accountability frameworks, responsible decision-making processes & credible ESG disclosures supported by independent assurance/verification where appropriate, to promote stakeholder trust and long-term value creation.
- Uphold the highest standards of business ethics and professional conduct, ensuring compliance with the ACX's Code of Conduct and fostering a culture of integrity, transparency and responsible business behaviour across all operations and business relationships
- Promote responsible and ethical business practices throughout the value chain by communicating ESG expectations to suppliers and business partners through the Supplier Code of Conduct, engagement programmes, periodic assessments and continual improvement initiatives.

Governance and Review

This Policy applies to all employees, operations and facilities of AdaniConneX and where applicable, extends to suppliers, contractors, consultants, business partners and other entities across its value chain. AdaniConneX expects all relevant stakeholders to uphold the principles and commitments set forth in this Policy and to conduct business in a manner consistent with its ESG objectives. The management-level ESG Committee shall be responsible for supporting the implementation and driving ESG initiatives across the organisation. The Policy shall be reviewed annually and approved by the Board to ensure continued alignment with applicable laws, stakeholder expectations, evolving ESG priorities and industry best practices.

Place: Ahmedabad

Date: 22/07/2026