

Human Rights Policy

Purpose

AdaniConneX ('ACX') and ACX Group (any entity, operation, or investment more than 50% owned by ACX) hereinafter referred as ACX or Group is committed to conducting our business in a manner that respects and upholds the Human Rights of all the stakeholders, including our employees, the communities in which we operate and all individuals within our value chain. This policy is guided by internationally recognised principles and standards, including the International Bill of Human Rights, UN Guiding Principles on Business and Human Rights (UNGPs), UN Global Compact (UNGC), UN Sustainable Development Goals (UNSDGs), ILO Declaration on Fundamental Principles and Rights at Work, the Universal Declaration of Human Rights (UDHR) and SA8000, along with applicable national laws and regulations, including the Companies Act and SEBI's BRSR framework.

Commitment

We shall endeavor to:

- Ensure compliance with applicable regulatory requirements related to human rights principles.
- Maintain zero tolerance for forced labour, child labour, human trafficking and all forms of exploitative employment practices and prohibiting the employment of individuals below the legal minimum working age.
- Provide fair remuneration and benefits that meet or exceed legal minimum requirement.
- Provide a safe, secure, healthy and hygienic work environment for our workforce.
- Respect the rights of our workforce to form or join trade unions and to bargain collectively.
- Promote Diversity Equity & Inclusion (DEI) by ensuring equal opportunity and prohibiting discrimination or harassment based on gender, color, race, caste, language, religion, political or other opinion, origin, property, birth, disability, age, marital status, sexual orientation, economic or social situation, health status.
- Respect the cultural heritage, traditions and rights of local and indigenous communities impacted by our projects and operations. Where land acquisition is necessary, we are committed to transparent and fair processes, including the principle of Free, Prior and Informed Consent (FPIC) where applicable.
- Identify, assess & mitigate potential and actual adverse human rights impacts across our operations and value chain.
- Ensure suppliers, contractors and other business partners uphold similar human rights principles.
- Establish and maintain effective and accessible grievance mechanisms for employees and external stakeholders who may be adversely impacted by our operations, ensuring a transparent and fair process for remediation.
- Ensure that our security arrangements are consistent with the human rights standards.
- Communicate and report on human rights performance and progress in a transparent manner through public disclosures, in line with national or global reporting standards and rating frameworks.
- Promote and uphold respect for human rights across all functions and stakeholder groups by preventing human rights violations, addressing adverse impacts through fair and transparent remediation processes and fostering a culture of human rights awareness through regular training and capacity-building initiatives.
- Foster a safe and trusted environment for raising any form of human rights concerns and prohibit any form of retaliation or adverse treatment against individuals who, in good faith, report concerns or participate in grievance resolution processes.

Governance and Review

This policy is applicable to all AdaniConneX employees, contractors, suppliers and other associated business entities across the value chain. The Chief People Officer shall be responsible for the implementation of this policy with an oversight by the Company's Board of Directors. Performance against this Policy will be regularly reviewed to ensure its effectiveness, appropriateness and continuous improvement. The Policy shall be reviewed periodically and approved by the Board to reflect on evolving best practices, legal and regulatory requirements and stakeholder expectations.

Place: Ahmedabad

Date: 22/07/2026