

STAKEHOLDER ENGAGEMENT POLICY

AdaniConneX (ACX) believes that stakeholder engagement is fundamental to understanding stakeholder expectations, managing environmental and social risks, enhancing credibility, and building trust. ACX identifies its stakeholders as individuals and groups who can influence or are affected by its operations, projects, and business activities, including employees, communities, customers, supply chain partners, investors, regulators, contractors, media, and civil society organizations.

ACX is committed to maintaining transparent, inclusive, and continuous engagement with stakeholders to foster sustainable relationships, support informed decision-making, strengthen collaboration, and create long-term value across its operations and projects.

To achieve this, ACX and its subsidiaries will:

- Conduct business with integrity, compliance and alignment to ACX values, ESG commitments and stakeholder expectations.
- Earmark appropriate resources for stakeholder engagement based on stakeholders' level of interest, influence, expertise, expectations, willingness to engage, dependence on ACX, and the significance of engagement.
- Build stakeholder trust through transparency, accountability, inclusivity and collaboration.
- Increase organizational credibility by proactively identifying and addressing stakeholder concerns before they evolve into environmental, social, operational or reputational risks and by incorporating lessons learned into business operations and project activities.
- Identify vulnerable and potentially affected communities surrounding project locations and respect their rights, interests, wellbeing and opportunities for social and economic development.
- Ensure Informed Consultation and Participation (ICP), where applicable, by providing stakeholders with timely, accessible and relevant information and meaningful opportunities for engagement.
- Implement site-specific Stakeholder Engagement Plans (SEPs) for continuous two-way engagement.
- Promote awareness and capability development through training, communication and sharing of best practices among employees, contractors, and other relevant stakeholders.
- Improve organizational performance through stakeholder engagement, regular review of engagement outcomes, monitoring of commitments, incorporation of stakeholder feedback into decision-making processes and disclosure of material outcomes through ESG reporting and other communication channels.
- Maintain accessible grievance mechanisms for timely, fair and transparent resolution of concerns.

The process of stakeholder engagement is as important as the content of the engagement itself. Therefore, ACX shall establish appropriate engagement channels with suitable frequency and formats to facilitate meaningful, transparent, and continuous stakeholder participation. These channels may include, but are not limited to:

- Community meetings and consultations
- Contractor and supplier engagement sessions
- Periodic communications from management and project leadership
- Town halls and employee engagement programs
- Performance review and career development discussions
- Forums for grievances, concerns, and feedback
- Toolbox talks and HSE engagement sessions
- Operations and project review meetings
- Project-specific stakeholder consultations and engagement activities as defined in the Stakeholder Engagement Plan (SEP)

This Policy shall be reviewed periodically for its continued relevance and updated as necessary to reflect evolving stakeholder expectations, business requirements, regulatory obligations, and ESG commitments. The Stakeholder Engagement Plan (SEP) shall be implemented at the project/site level in accordance with this Policy to support effective stakeholder engagement and management.

Place: Ahmedabad

Date: 01.08.2026



Samir Vora
(CEO - India)