

Adani Total Gas Ltd. (ATGL) Non-Discrimination and Anti-Harassment Policy

rsion 1.0

This version supersedes all previous versions with a lesser version number

At Adani Total Gas Limited (ATGL), we are committed to fostering an inclusive, safe, and respectful environment for all individuals associated with our organization. Discrimination, Harassment, and abuse of any kind will not be tolerated under any circumstances. This policy outlines our zero-tolerance approach towards harassment, discrimination and abuse and provides guidelines for addressing and preventing such incidents.

Non-Discrimination:

ATGL does not discriminate in employment opportunities or practices based on race, color, religion, disability, national origin, genetic information, sex, age, sexual orientation, gender, marital status, or any other characteristic protected by applicable law.

Our policy of Non-discrimination in employment applies to recruitment, hiring, compensation, promotions, transfers, discipline, terminations, access to benefits and training and all other aspects of employment.

Anti-Harassment:

We will provide a safe and pleasant work environment where everyone is treated with fairness and respect. It is against Company policy for any employee to verbally or physically harass or discriminate against another employee based on an individual's race, color, religion, national origin, genetic information, sex (including pregnancy), age, sexual orientation, gender, marital status, or any other characteristic protected by applicable law. Harassment of employees in the workplace by any third party will not be tolerated either. Any employee who violates the company policy against harassment will be subject to corrective action, up to and including termination.

The conduct prohibited by this policy, whether verbal, physical, or visual, includes any discriminatory employment action and any welcome or unwelcome conduct that is inflicted on someone because of that individual's protected status. Among the types of conduct prohibited by this policy are epithets, slurs, jokes, negative stereotyping, intimidating acts, and the circulation or posting of written or graphic materials that show hostility toward individuals because of their protected status. The company prohibits that conduct in the workplace, even if the conduct is not sufficiently severe or pervasive to constitute unlawful harassment.

Sexual Harassment:

The ATGL has a policy of "Prevention of Sexual Harassment" to any instance of sexual harassment and ATGL shall take all necessary steps to investigate and take necessary action with respect to such incidents as per the policy Guidelines.

The policy can be found here:

https://www.adanigas.com/-/media/Project/AdaniGas/Investors/Investor-download/Policies/Prevention-of-Sexual-Harrssment1.pdf

Training and Awareness:

 The organization will provide regular training and educational programs to employees and stakeholders to raise awareness about discrimination, abuse, and their impact on the workplace.



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• The organization will ensure that all employees understand their rights and responsibilities under this policy and are aware of the available reporting mechanisms.

Reporting:

- Individuals who experience or witness discrimination or abuse are strongly encouraged to report the incident promptly to their immediate supervisor, Human Resources, or designated authority.
- Reports can be made verbally or in writing, ensuring that all details, including date, time, location, parties involved, and a description of the incident, are provided.
- Anonymous reporting mechanisms should be made available by the businesses to encourage reporting without fear of reprisal.

Responding To Complaints:

All reports describing conduct that is inconsistent with this policy will be investigated promptly and thoroughly. Employees are required to cooperate in investigations. The Company is committed to maintaining confidentiality.

Corrective Action:

We will not tolerate any harassment or discrimination in violation of this policy. If an investigation reveals that a violation of this policy or other inappropriate conduct has occurred, then the Company will take corrective action, including discipline, up to and including termination of employment, as is appropriate under the circumstances, regardless of the job positions of the parties involved. The Company may discipline an employee for any inappropriate conduct discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law. If the person who engaged in conduct in violation of this policy is not an employee of ATGL, then we will take whatever corrective action is reasonable and appropriate under the circumstances.

Applicability:

This policy applies to all individuals, including employees, contractors, volunteers, visitors, and clients associated with ATGL. It covers discrimination and abuse based on race, color, ethnicity, national origin, religion, gender, gender identity, sexual orientation, age, disability, or any other protected characteristic under applicable law.

ATGL will periodically review and update this policy to ensure its effectiveness and compliance with changing legal requirements and best practices.

For Adani Total Gas Limited

Suresh P Manglani ED & CEO