	Adani Total Gas Ltd. (ATGL) Supplier Code of Conduct	Version	Release version 2.0
		Issue Date	
		Effective Date	
		<i>This version supersedes all previous versions with a lesser version number</i>	

1. Introduction

Adani Total Gas Limited (ATGL) is committed to responsible and ethical business practices in the areas of human rights, labour practices, environment, anti-corruption, and other governance related areas. ATGL considers suppliers as business partners. This Code of Conduct is aimed at collaborating with our suppliers in the promotion of lawful, professional, and fair business practices that integrates respect of human rights, business ethics and environment.

2. Applicability

This Supplier Code of Conduct is applicable to all Suppliers globally. Here, "Supplier" refers to material suppliers/ service providers/ vendors/ traders/ agents/ consultants/ contractors / third parties including their employees, agents and other representatives, who have a business relationship with and provide, sell, seek to sell, any kinds of goods or services to ATGL or any of its subsidiaries and associated entities.

The Supplier shall communicate the code to related entities and subcontractors who support them in delivering materials or services and ensure adherence from all related entities and subcontractors.

3. Guidelines on Code:


- **Regulatory Compliance:**

The Supplier shall ensure to comply with all applicable laws and regulations in all the territories it operates.

- **Human Resources**

- **Freely Chosen Employment:** The Supplier shall ensure to hire all their employees on their own free will; and all their operations are free from child, forced, and bonded labour or any other form of compulsory labour or slavery.
- **Equal Opportunity:** The Supplier shall ensure to provide equal employment opportunities and conducive environment to all its employees for their growth without any discrimination and harassment.
- **Working Hours, Wages and Benefits:** The Supplier shall comply with all applicable laws and regulations with respect to working hours, minimum wages, employing labour, including those pertaining to women and children. The Supplier shall treat their employees with respect and dignity.
- **Human Trafficking:** The Supplier shall ensure the compliance with all anti-human trafficking laws internally and across their supply chains.
- **Freedom of Association and Collective Bargaining:** The Supplier shall be committed to an open and constructive dialogue with their employees and worker's representatives, in accordance with local law. The Supplier shall explicitly respect the right of employees to freely associate, form or join trade unions, and engage in collective bargaining in accordance with applicable laws and the International Labour Organization (ILO) Core Conventions. The Supplier shall not interfere with, discriminate against, or retaliate against workers for exercising such rights.

2

	Adani Total Gas Ltd. (ATGL) Supplier Code of Conduct	Version	Release version 2.0
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- **Health and Safety**

- The Supplier shall ensure provision of safe and healthy working environment to its employees/workers.
- The Supplier shall ensure necessary precautionary safety measures and shall design processes to protect against potential accidents and occupational hazards.
- The Supplier shall ensure that general principles of health and safety risk prevention are met in the process of delivery of products and services. General principles include identifying, minimizing and preventing hazards using competent and trained professionals; maintaining safe equipment and tools; providing personal protective equipment as required.
- The Suppliers shall ensure that adequate training is provided for all employees, workers/contractors on health and safety issues.
- The Supplier shall ensure provision of safe, clean and secure accommodations to their employees, if applicable.


- **Environment Management**

- **Natural Resource Conservation:** The Supplier shall ensure that optimal processes exist for conservation of natural resources and minimization of the release of harmful emissions to the environment.
- **Efficient Systems and Processes:** The Supplier shall ensure ongoing initiatives to promote environmental responsibilities and encourage environment-friendly processes and technologies to mitigate climate change effects. The Supplier shall establish energy management systems to track and reduce energy consumption and shall progressively transition to low-carbon and renewable sources of energy.
- **GHG Emissions:** The Supplier shall strive to monitor and adopt measures to reduce its GHG emission footprint.
- **Pollution Prevention:** The Supplier shall ensure compliance with all laws pertaining to sustainability, pollution, environment protection etc. as applicable.
- **Waste Management:** The Supplier shall ensure management of wastes of any form - hazardous, non-hazardous, industrial, solid/ liquid/gaseous as per the prevailing laws and recommended guidelines.
- **Biodiversity and Land Use:** The Supplier shall commit to no deforestation and ensure that business activities do not negatively impact biodiversity or contribute to ecosystem degradation. The Supplier shall promote land conservation, restoration, and biodiversity protection practices.
- **Environmental Certifications:** The Supplier shall obtain and maintain relevant environmental certifications (e.g., ISO 14001, FSC, EMAS) as applicable to their industry.

- **Governance**


- **Adherence with Company Policy:** The Supplier shall follow all contract conditions and other applicable policies of the Company while executing any work/service or undertaking any other activity with ATGL.
- **Bribery or Corruption:** Supplier must not, either directly or indirectly, offer money or anything of value to public officials, their close relatives, employees or personnel of the company or any private sector with the intention of gaining a business advantage or encouraging improper conduct. Additionally, suppliers must refrain from giving or receiving gifts or hospitality that could influence on the normal course of business decisions, create conflicts of interest, or foster a sense of obligation.
Further, Suppliers are strictly prohibited from offering or accepting bribes, gifts, hospitality, or other illicit incentives to or from their business partners.

2

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- **Conflict of Interest:** Supplier shall disclose any personal, professional, or financial relationships or interests with the Company or any of its group company/affiliates that could be seen as influencing or biasing the work/services being undertaken to uphold transparency and ethical standards. Suppliers must not use family, social, or political connections to seek preferential treatment or create situations that could result in actual or potential conflicts of interest with their business partner.
- **Grievance Redressal:** The Supplier shall ensure that any worker/ employee, acting individually or with other workers, can submit grievance and an effective grievance procedure should be established for its redressal.
- **Reporting of Unethical Practices:** The Suppliers shall report any unethical activity or discrimination if practiced by any of ATGL employee/ Manpower and other supplier(s) as per the whistle-blower policy.
- **Intellectual Property:** The Supplier shall ensure that all employees' and business partners' privacy and intellectual property rights which includes protection against disclosures, patents, copyrights and trademarks are protected.
- **Third-Party Representation:** The Suppliers shall not be authorized to represent ATGL or to use its brands without written permission from ATGL. Third parties and their employees who are authorized to represent ATGL shall be abided by provision of the non-disclosure agreement/confidentiality clause signed with the Company.
- **Prohibition on Insider Trading:** The Suppliers and their personnel shall not use any material or non-publicly disclosed information for trading of ATGL/affiliates 's Businesses securities or enabling others for the same.
- **Anti-Competitiveness:** The Supplier shall comply with all applicable antitrust and competition laws and avoid anti-competitive practices.
- **Respect Human Rights:** Supplier shall respect fundamental human rights and complies with both Company policies and international standards on Human Rights. Supplier shall promote equal opportunities for all employees and applicants, upholding non-discrimination on any basis including personal characteristics, backgrounds, or categories protected by law.
- - **Work Practices Integrity Management**
 - **Supplier shall ensure** availability and validity of all governance and compliance documents, including labor license, PF, ESIC, BOCW registrations, and relevant insurance policies.
 - **Supplier shall ensure** up-to-date documentation of project and O&M activities, including Pipebook, RT reports, hydrotest and commissioning records, maintenance logs per ATGL checklist etc.
 - **Supplier shall ensure** effective inventory management of Free Issue Material (FIM) & spares with quality storage as per OEM guidelines, FIFO methodology, timely reconciliation and return of unused materials linked to RA invoices.
 - **Supplier shall ensure** submission of bill within 1 month and contract closure within 3 months of work completion
 - **Subcontracting:**
 - The Supplier shall not use any subcontractor in connection with any ATGL business unless subcontractor abides by the same conditions as put forth by ATGL. The Supplier shall submit declaration with list of subcontractors to ATGL prior to commencement of work. ATGL BUs must be notified immediately in case of any changes in subcontracting.



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4. Supplier Evaluation:

ATGL has set specific supplier expectation regarding supplier performance with the Code. ATGL will continue to evaluate the Suppliers taking into consideration the ability to meet the objective and expectations of this Code.

5. Continuous Improvement


Where applicable, ATGL will support Suppliers in the establishment of best practices to meet and exceed the standards outlined in the Code.

6. Acceptance

By signing the purchase order/ contract/ agreement copy the Supplier acknowledges having read, understood, and accepted the guidelines as described in the Supplier Code of Conduct. The Suppliers are expected to fulfil the aforementioned key elements of this policy by incorporating them in their own business practices.

The content and robustness of implementation of this policy will be reviewed periodically and revised accordingly.

For Adani Total Gas Limited


 Suresh P Manglani
 ED & CEO
 16/09/2025