

adani

Ports and
Logistics

Adani Ports and Special Economic Zone Limited

Tax Transparency Report for
Financial Year 2023-24



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Presenting Adani Ports and SEZ Limited Tax Transparency Report

Aligned with the highest standards of ethics and transparency, Adani portfolio of companies ('the Group') has been coming out with Tax Transparency Reports since FY 2022-23 as a voluntary extra-statutory initiative. The Tax Transparency Report provides a holistic review of our approach to tax management, along with our long-term policies, tax computation model, and what and when we pay as taxes and other contributions. The document comprises operational and financial numbers related to Adani Ports and Economic Zone Limited ('APSEZ / the Company') and the Group as on March 31, 2024. We believe that this future-driven document, aimed at bolstering stakeholder transparency, will help reinforce our philosophy of 'Growth with Goodness'.

'Growth with goodness'

This ethos motivates us to strive to be a world-class leader in businesses that enrich lives and contribute to nation building. It reinforces our belief that anyone who is touched by our business, whether a company or an individual, must grow holistically. It underpins our unflinching commitment and indefatigable spirit to grow in the face of every adversity with the objective of delivering positive outcomes. Going beyond merely stating our purpose, these three words represent a platform for long-term business sustainability. They demonstrate our commitment to staying engaged with the government, with our tax and other contributions representing our contribution to the government. This engagement, in turn, makes it possible for the government to empower the society at large to drive sustained growth momentum for the nation.



Part 1 Perspective

04 Managing Director's Message

05 Chief Executive Officer's Message

Managing Director's Message



During the year, APSEZ contributed ₹ 86,813 mn as tax and other contributions globally, demonstrating our commitment to robust economic growth and community development worldwide.

The all-encompassing transformation witnessed by APSEZ over the past two and half decades has led to its emergence as a powerhouse of operational and financial excellence. This transformation has propelled our evolution from a single-location business into a global leader in transport utilities, underpinned by a robust infrastructure, diverse operations, and strategic partnerships, structured to drive holistic and sustainable growth.

This Tax Transparency Report for FY 2023-24 highlights our impact on sustainable development in the regions we serve, while underlining our deep-rooted commitment to responsible tax practices. Marking its second year of voluntary publication, this report reaffirms APSEZ's dedication to the highest corporate transparency and exemplary disclosure standards, which we believe are critical to ensuring inclusive and sustainable national growth.

During the year, APSEZ contributed ₹ 86,813 mn as tax and other contributions globally, demonstrating our commitment to robust economic growth and community development worldwide. APSEZ's world-class infrastructure facilities and efficient cargo handling helps the Government collect significant customs duties. By streamlining global trade routes, these ports contribute directly to the nation's growth. The custom contribution generated by the Government at our ports during the fiscal stood at ₹ 809,155 mn.

In line with our strong focus on promoting ESG as a key enabler of sustainable progress, we enhanced our tax compliance and transparency efforts across the three pillars of environmental, social and governance. We made targeted investments towards aligning our tax policies more intricately with the Company's wider sustainability thrust.

The positive outcomes of our tax transparency and business investments were also manifest in our record-breaking achievements during FY 2023-24, along with the significant strides made by APSEZ towards becoming a global, diversified transport utility. Our initiatives to expand and modernise our port capacities, both domestically and internationally, reinforced our industry and market leadership, paving the way for greater future growth and stakeholder value creation.

Thank you for your sustained trust and cooperation. With your continued support and engagement, we shall steer further positive change and contribute to a fairer, more sustainable future.

Karan Adani

Chief Executive Officer's Message

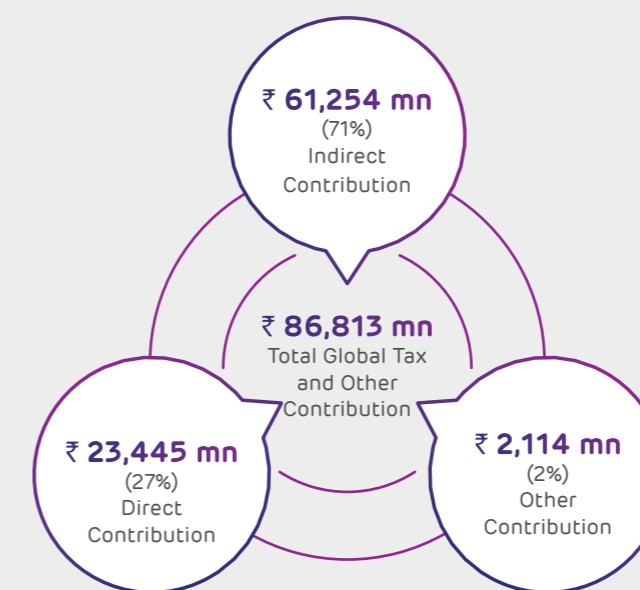


“APSEZ is currently experiencing a pivotal moment in its journey towards nation-building and sustainable growth. We are in an extraordinary phase characterised by significant milestones in our operational, financial, and ESG (Environmental, Social, and Governance) performance. This progress is not only a testament to our commitment to excellence but also reflects the trust and support we receive from our nation and stakeholders.

Together, we are fostering a future that emphasises 'Growth with Goodness', laying the foundation for a prosperous and resilient economy.”

Ashwani Gupta

Overall Snapshot - Global Tax and Other Contributions



For more details on India and overseas tax and other contribution, please refer to Part 6 of the Report.



Part 2
**Adani Portfolio of
Progress**

08 About Adani Portfolio

13 Adani Portfolio of Companies - Overall Tax and
Other Contributions for FY 2023-24

About Adani Portfolio

At the heart of Adani Portfolio of progress, there is a remarkable journey of evolution over the years. Like the ascending peaks of a mountain range, we have grown every year – not only on the strength of our business performance, but equally and importantly, through our steadfast commitment to environmental, social and governance practices, underpinned by a culture of transparency.

The Adani portfolio of companies today stands amongst India's largest and fastest-growing diversified business portfolios, spanning transport, logistics, energy and utility, materials, metals, mining, and various B2C sectors. The portfolio comprises 11 publicly

traded companies, including four investment grade (IG)-rated businesses, and is India's sole Infrastructure Investment Grade bond issuer.

The financial performance for FY 2023-24 demonstrated the portfolio's deep-rooted strength and expertise. The year saw Adani portfolio of companies achieve an unprecedented milestone, recording the highest-ever EBITDA of ₹ 82,917 crore (roughly USD 10 bn), a remarkable surge of 45%. This exceptional financial performance drove PAT to a record high of ₹ 40,129 crore, demonstrating a remarkable 70.8% growth. Net Debt to EBITDA further fell to 2.2x from 3.3x over the previous year, lend the portfolio additional headroom for

future growth. All this resulted in all-time-high levels of liquidity for the Group, with a cash balance of ₹ 59,791 crore.

The portfolio's robust contribution to the exchequer, in the form of direct, indirect and other contributions, underlines its transparent and sustainable approach to taxation. The Adani Group sees this contribution as a vital engine for the nation's socio-economic development, in line with its vision for sustainable and holistic value creation. Stringent compliance with all statutory obligations remains an uncompromising imperative for the portfolio to uphold the highest standards of corporate responsibility.

The Promoter

Adani portfolio of companies, headquartered in Ahmedabad, India, has been founded and promoted by visionary industrialist Mr. Gautam Adani. The operations of the portfolio commenced in 1988 with commodity trading business under the flagship company, Adani Enterprises Limited (previously Adani Exports Limited), and has, since, grown and expanded under the inspiring leadership of Mr. Adani to scale new heights.

Core Philosophy

Adani portfolio of companies is guided by the philosophy of 'Growth with Goodness', which emphasises sustainable and responsible development aligned with national priorities. To this end, ambitious ESG targets, with a focus on decarbonisation, have been set.

In one of the largest commitments of its kind globally, a significant USD 100 bn investment has been earmarked for a green transition and transport by 2030. This includes building Integrated Green Hydrogen Ecosystem encompassing three giga factories to develop 10 GW solar panels, 5 GW hydrogen electrolyzers and expanding the portfolio of Adani renewables to 50 GW. Five major companies – Adani Ports, Adani Green Energy, Adani Energy Solutions, ACC and Ambuja – have

committed to achieving net zero by 2050. Furthermore, a pledge has been made at WEF's 1t.org to plant 100 mn trees by 2030.

Adani Foundation, currently touching over 9.1 mn lives, is positioned to address the critical needs of New India in areas like health, nutrition, education, basic sanitation, women's livelihood and skills development.

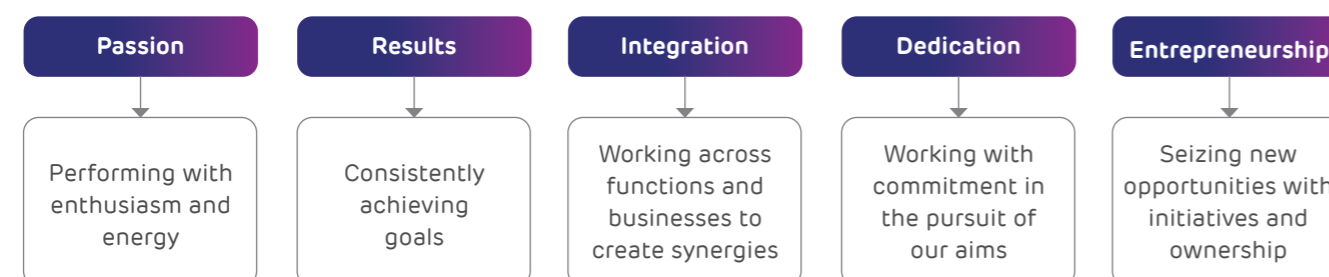
Vision

To be a world-class leader in businesses that enrich lives and contribute to nations in building infrastructure through sustainable value creation.

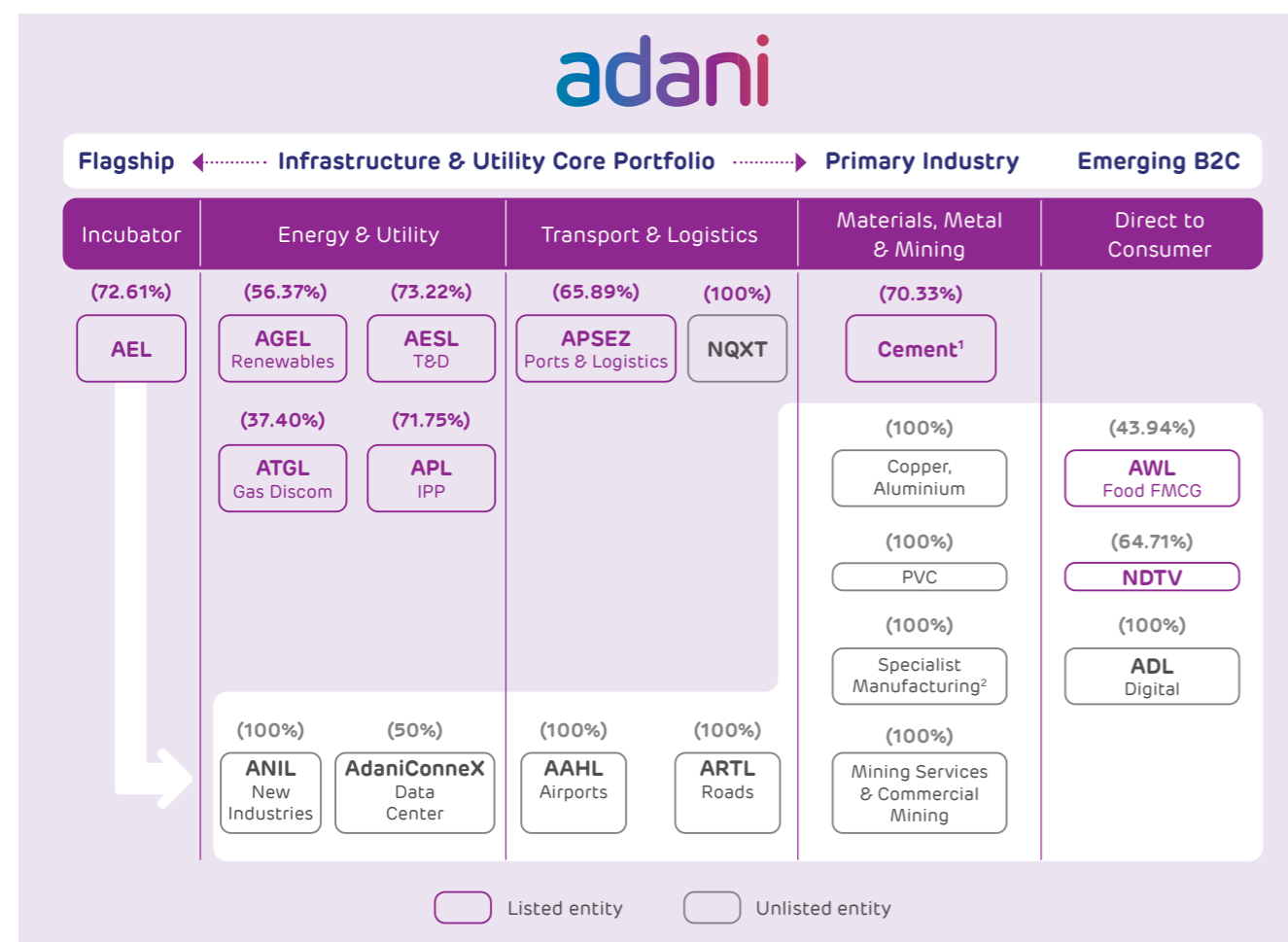
Values



Culture



Portfolio structure: A world-class infrastructure and utility portfolio



(%) Adani family's equity stake in the Adani portfolio companies

(%) AEL equity stake

Holdings are as on March 31, 2024, except for cement, in which holding is as on April 30, 2024.

- Cement business includes 70.33% stake in Ambuja Cements Limited which, in turn, owns 50.05% in ACC Limited, Adani directly owns 6.64% stake in ACC Limited. Ambuja also owns 60.44% stake in Sanghi Industries
- Includes the manufacturing of Defence and Aerospace Equipment

Data Center, JV with EdgeConneX, **AEL:** Adani Enterprises Limited; **APSEZ:** Adani Ports and Special Economic Zone Limited; **AESL:** Adani Energy Solutions Limited; **APL:** Adani Power Limited; **AGEL:** Adani Green Energy Limited;

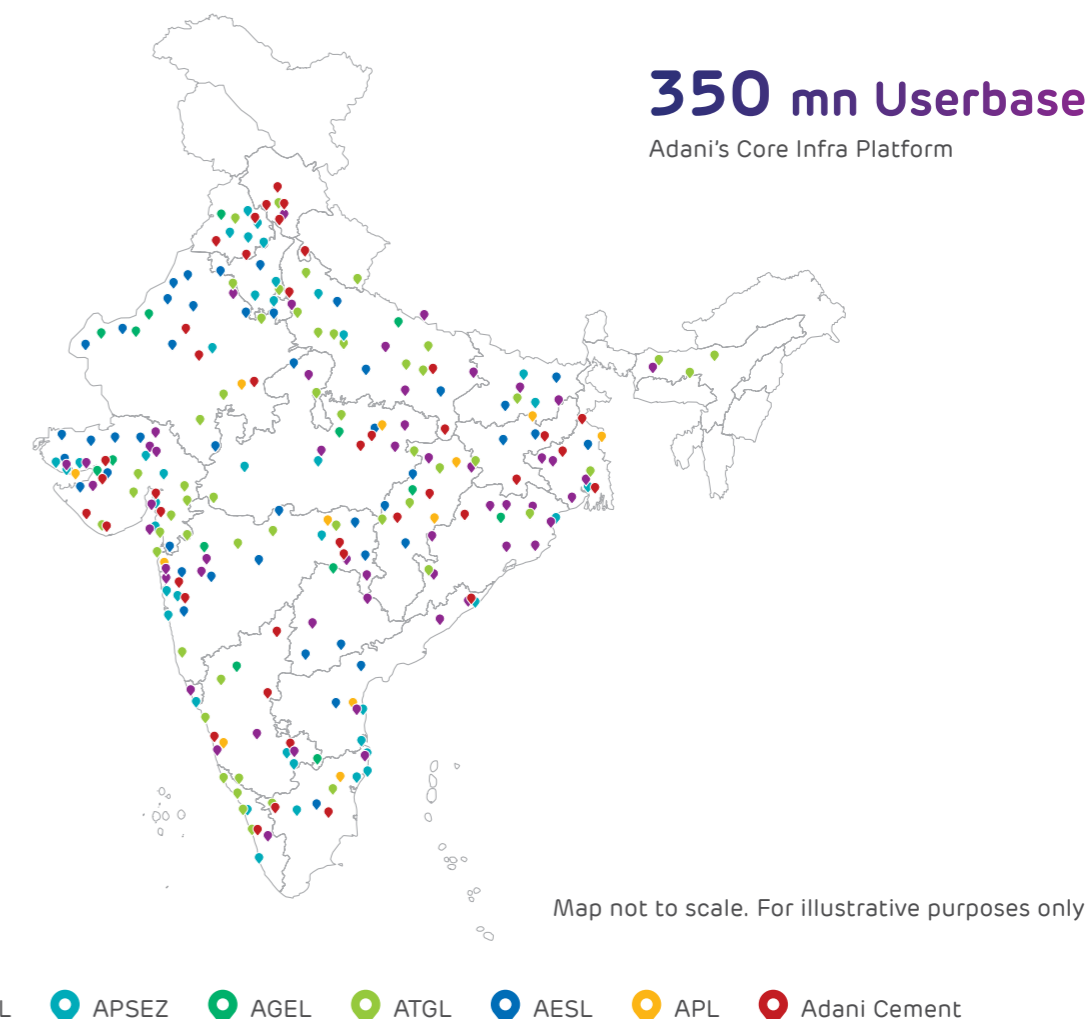
AAHL: Adani Airport Holdings Limited; **ARTL:** Adani Roads Transport Limited; **ANIL:** Adani New Industries Limited; **AWL:** Adani Wilmar Limited; **ADL:** Adani Digital Labs Private Limited; **NDTV:** New Delhi Television Limited; **PVC:** Polyvinyl

Chloride; **NQXT:** North Queensland Export Terminal; **ATGL:** Adani Total Gas Ltd, JV with TotalEnergies; **T&D:** Transmission & Distribution; **IPP:** Independent Power Producer

Committed to a stronger than ever India

With its extensive capacities spanning critical sectors of the economy and a nationwide footprint, Adani portfolio of companies boldly leads the way in building a stronger than ever India designed to steer global growth. The Adani portfolio of companies are strategically positioned to capture market leadership and propel the nation forward.

National footprint with deep penetration



Scale and market leadership across businesses

- | | | |
|--|---|--|
| <ul style="list-style-type: none"> India's largest business incubation company India's largest airport infrastructure company 4 GW module manufacturing 1.5 GW wind turbine generator capacity | <ul style="list-style-type: none"> 17 MW data center capacity 500 KTPA Copper unit at Mundra 5,000+ lane kms of road projects 9 mine service contracts (operational: 4 coal and 1 iron ore) | <p>Ambuja Cements Limited (with subsidiaries ACC Limited and Sanghi Industries Limited)</p> <ul style="list-style-type: none"> Second-largest cement manufacturer in India Iconic cement brand 78.9 MTPA cement manufacturing capacity |
|--|---|--|

Adani Total Gas Limited

- India's largest private city gas distribution business
- 52 geographical areas of gas supplies, including 19 IOAGPL GAs
- 606 EV charging points and 1,040 under various stages of construction

Adani Ports and Special Economic Zone Limited

- India's largest private sector port operator
- India's largest port (Mundra)
- Highest margin among peers
- 627 MMT cargo handling capacity

Adani Energy Solutions Limited

- India's largest private-sector transmission and distribution company with over 20,500 ckm of network and 12 mn consumers
- Only private player in the country to have built and operating a HVDC line
- One of India's most efficient transmission and distribution players in terms of line availability benchmarks, and distribution losses and other operating parameters
- AEML is rated as India's No.1 power utility (2nd year in a row)
- 34.35% Renewable power in the overall energy mix of AEML by FY 2023-24

Adani Power Limited

- India's largest private sector thermal power producer
- India's largest single location private thermal IPP (Mundra)
- 15.25 GW of operating capacity and 4.72 GW locked-in portfolio including under-construction and under-acquisition plants

Adani Green Energy Limited

- Among the world's largest renewable energy business
- World's largest wind-solar hybrid power project (2,140 MW) in Rajasthan
- 21,953 MW locked-in portfolio
- Fully secured growth up to 50 GW by 2030

NDTV Limited

- Among India's most trusted media companies
- Countries Presence – 65
- Cables & DTH Households (in million)
NDTV 24*7 (88), NDTV India (140), NDTV Profit (34)
- 32.25 mn YouTube subscribers

Adani Wilmar Limited

- India's largest edible oil brand
- Amongst India's largest port-based edible oil refinery
- 5,000 MT per day edible oil refinery capacity
- 7.2 lakh retail outlets

Adani Portfolio of Companies - Overall Tax and Other Contributions for FY 2023-24

(₹ in mn)

Company	Direct Contribution	Indirect Contribution	Other Contribution	Total
AEL	76,294	97,586	2,024	175,904
ACL	27,255	124,039	1,542	152,836
APSEZ	23,445	61,254	2,114	86,813
APL	48,122	6,535	594	55,251
ATGL	3,486	7,813	102	11,401
AESL	14,117	23,454	1,166	38,737
AGEL	39,342	20,467	293	60,102
TOTAL	232,061	341,148	7,835	581,044

For Basis of Preparation and Scope, please refer Individual Tax Transparency Reports published by each entities.





Part 3

Adani Ports and Special Economic Zone Limited

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About Adani Ports and Special Economic Zone Limited

India's largest transport utility: Revolutionising ports, logistics, and industrial landscape

APSEZ, India's largest private-sector port player, has rapidly grown in just over two decades, from a single port to become India's largest transport utility operating 13 domestic ports/terminals (including Gopalpur Port) and 2 under construction ports/terminals across 8 maritime states and 1 union territory. The Company provides integrated services in the ports, logistics, and SEZ segments. It is well recognised for its industry-leading performance and best-in-class efficiency, resulting in domestic port EBITDA margins of 71%. The Company has also expanded operations on a global scale, with a presence in Israel, Sri Lanka, Australia and Tanzania. Its flagship Mundra Port in Gujarat is distinguished as India's largest port, and also the largest container handling port, housing the 8,000+

hectares Mundra SEZ, India's largest multi-product SEZ, Free Trade and Warehousing Zone (FTWZ), and Domestic Industrial Zone.

The Company's model, fortified by advanced technologies, world-class infrastructure and extensive scale, equips it to efficiently handle large cargo volumes, aiding logistics cost reduction and the Government's 'Make in India' journey through seamless movement of goods nationwide. This value proposition, and our presence across the value chain, solidifies the Company's standing as a preferred partner, offering port-gate-to-customer-gate solutions. The Company's wide-ranging impact makes it an embodiment of progress, contributing to India's industrialisation, economic development, and net zero transition through green transportation (rail and coastal cargo movement). Extending

its influence to new frontiers of growth, APSEZ is building a presence in strategic global destinations, aiming to become the world's largest port company with integrated logistics offerings, and to strengthen India's prominence as a global trade hub.

Progressive portfolios with string of ports and integrated logistics network

APSEZ excels as a formidable entity, with a robust portfolio covering the port ecosystem and a dominant presence across India's coastline that provides access to 90% of the hinterland. It is also actively building a global presence, aiming to become a vital link in the global ports network. Its strategic approach positions the Company to capture opportunities arising from structural trade shifts and increasing consumption trends.



SEZ and Port Development

- 16,500+ hectares (ha) total land bank – 12,500+ ha at Mundra, India's largest SEZ, and 2,000+ ha each in Dhamra and Krishnapatnam Industrial Zones
- Supporting industry growth around the ports, bringing port services to customer's gate

₹ 413 crore

Revenue

₹ 98 crore

EBITDA

APSEZ value chain offerings and business edge

Ports

National footprint: 15 ports across the coastline with ~627 MMT installed capacity

Global presence: 2 ports (Haifa Port, Israel and under construction container terminal at Colombo, Sri Lanka) and 2 ports with O&M contracts in Australia and Tanzania

Advanced infrastructure capable of efficiently handling diverse cargo – dry bulk/break bulk, liquid/crude, containers, LNG, LPG and car/vehicle export

Comprehensive harbour services (dredging, vessel management, anchorage, pilotage, tug pulling, berthing, goods handling, internal transport, storage and handling, processing and final evacuation by road or rail)

Marine services provider with 111 tugs serving ports in India, Sri Lanka and Oman

₹ 24,125 crore

Revenue

₹ 15,246 crore

EBITDA

Logistics (through Subsidiary - Adani Logistics Limited)

- Extensive infrastructure: 127 trains, 12 MMLPs, 1.2 MMT grain silos, 2.4 mn sq ft warehousing space, 690 km rail tracks, 900 trucks
- Offering first and last-mile connectivity by connecting ports to customer gate

₹ 2,079 crore

Revenue

₹ 540 crore

EBITDA



A growth model aligned with stakeholder's prosperity and India's future

The pool of resources used



Financial capital

- ₹ 54,543 crore net worth
- ₹ 9,817 crore in cash and cash equivalents
- ₹ 7,416 crore capex in enhancing ports capacity and logistics network



Social and relationship capital

- ₹ 112.3 crore CSR spending
- Strategic partnerships across terminals and ports, ensuring cargo stickiness
- 5,805 suppliers (tier-1)



Manufactured capital

- Amongst largest transport utilities with 19 ports (incl. 4 international), industrial land (SEZ) and integrated logistics network
- World-class ports using a string of ports strategy, equipped with modern technology and infrastructure
- Stable and scalable operations with diversification across geographies (east-west coast) and cargo type



Natural capital

- Invested ₹ 1,493 crore in environmental initiatives
- Emphasis on responsible use of natural resources
- Undertaken comprehensive climate risk assessment



Intellectual capital

- Robust technology infrastructure driving unprecedented efficiencies and customer experiences
- 2,919 employees



Human capital

- 4,46,336 man-hours of skill training and 7,15,074 man-hours of safety training
- ₹ 2.3 crore spent on employee training and development

The outcomes generated



Financial capital

- ₹ 26,711 crore revenue
- ₹ 15,864 crore EBITDA
- ₹ 8,104 crore PAT
- 2.3x net debt/EBITDA
- ₹ 6 per share, Dividend distributed
- ₹ 15,018 crore net cash flow from operations
- 9% net debt reduction
- Investment grade rating from leading international agencies



Manufactured capital

- Top performing port operator with 67% capacity utilisation in India and 71% domestic EBITDA margins
- Sticky cargo with 56% volumes from tied-in customers
- 27% market share in India's cargo volumes and 2 ports amongst the top 10 for their annual cargo volumes
- 14% growth in rail transport, yielding a rail coefficient of 48%



Intellectual capital

- Agile and efficient transport utility with pricing power
- Real-time vessel tracking
- Ease of doing business and timely decision-making



Human capital

- 10% employee voluntary turnover
- Productive workforce with ₹ 9.66 crore revenue per employee
- 0.28 injury frequency rate and 0.07 fatality rate with 6 fatalities
- Employee Net-promoter score of 7.9



Social and relationship capital

- 1.64 mn direct and indirect beneficiaries from social programmes
- One-stop solution for customers with single window service, and offering first and last-mile connectivity
- Customer satisfaction score of 4.5
- Supplier satisfaction score of 4.25
- 73% sourcing from India and 54% within districts and neighbouring districts



Natural capital

- On track for net zero carbon emissions by 2025
- 13% renewable share in total electricity
- 9% reduction of total energy intensity
- 3% reduction in GHG emission intensity
- 6 ports ensuring zero waste to landfill

Global Presence

Domestic Presence

Pan-India footprint with a growing global presence
India operations



Map not to scale and used for representation only

■ Multipurpose Ports



- Container Terminals
- Warehouse (Operational)
- Bulk Terminals
- Agri Silos
- Multipurpose Ports
- Warehouse (Under Construction)
- Logistics Parks

APSEZ handled about a quarter of India's port cargo which has contributed ₹ 809,155 mn* of Customs Duty for the Indian Government's treasury during FY 2023-24.

* Mundra ₹ 356,485 mn; Kattupalli ₹ 121,532 mn; Hazira ₹ 99,602 mn; Navkar ICD Umbergaon ₹ 81,170 mn; Krishnapatnam ₹ 47,750 mn; Gangavaram ₹ 32,392 mn; Dhamra ₹ 29,673 mn; Patli ICD ₹ 18,702 mn; Dahej ₹ 11,373 mn; Karaikal ₹ 6,165 mn; Adani ICD Kilaraipur ₹ 2,945 mn; Dighi Port ₹ 1,035 mn; Adani ICD Borkhedi ₹ 287 mn; ICD Loni ₹ 43 mn; Kanech ICD Sahnewal ₹ 1 mn

Map not to scale and used for representation only.

APSEZ's ports and terminals are located across the Indian coastline, along both the west and east coasts. On the west coast, Mundra Port, Tuna Tekra terminal in Kandla Port, Dahej Port and Hazira Port in Gujarat, cater to the northern, central and western hinterlands. Mundra Port supports regional industries and fosters economic growth, and offers a strategic advantage on account of its location along the Delhi-Mumbai Industrial Corridor and the Western Dedicated Freight Corridor. The port also, benefits from its proximity to the NCR compared to other ports, and from its efficient rail connectivity to key hinterlands. Hazira Port is an all-weather port, built to serve multiple commodities such as Oil, Chemicals, Container and Bulk Cargo. Its excellent road connectivity and direct berthing facilities, dedicated warehouses, liquid tank farms, and open stockyards facilitate faster turnaround of vessels, storage and evacuation of cargoes. Additionally, Dighi Port and the Company's terminal at Mormugao Port caters to the demand-rich hinterland of central and southwestern India.

On the eastern coast, Dhamra Port serves the resource-rich, landlocked hinterland of eastern and northeastern India. Gopalpur Port is located in the mineral-rich hinterland with coal mines, iron

ore mines and large mineral based industries like integrated steel plants, alumina plants etc., while Gangavaram Port serves the mineral-rich state of Chhattisgarh and western Odisha. Moving South, Kattupalli Port, Krishnapatnam Port, Karaikal Port and Ennore container terminal cater to the growing industrial hubs in the south. The under-construction terminal at Haldia would cater to a large hinterland, including Bengal, Bihar, Uttar Pradesh, Jharkhand, Assam, Northeastern Hill States, and the landlocked neighbouring country of Nepal. Vizhinjam Port, with its proximity to major shipping routes connecting Europe, the Persian Gulf and the Far East, is poised to emerge as a global transshipment hub.

APSEZ's journey over the last two and half decades has been exceptional. From a single-business, single-location operation, it has evolved into one of the largest transport utilities with a global robust infrastructure ecosystem spanning multiple businesses, expertise, and partnerships. Its customer-centric model and technology-driven platform have been instrumental in this transformation. The intent, from here onwards, is to leverage this strong foundation to sustainably grow globally, with several definitive steps underway.

APSEZ is positioning itself for aggressive global expansion, especially in key trade routes. Our operations in Haifa Port, Israel's largest port, provide us with access to the busy Mediterranean and to the unfolding opportunities for expansion in the Middle East. We are nearing commissioning of India's first semi-automated mega transshipment terminal at Vizhinjam, Kerala. With the disruptions in the Red Sea region, this port is well positioned to address the growing trans-shipment demand in the Indian Ocean Region (IOR). The ongoing development of an international container terminal in Colombo, Sri Lanka, will further bolster our presence in this region.


We are currently present in four international geographies – Australia, Israel, Tanzania and Sri Lanka. APSEZ owns the Haifa Port in Israel, and has an O&M contract for Abbot Point Bulk Coal Terminal in Australia and for Container Terminal 2 at the Dar es Salaam Port in Tanzania. The Company is also developing a trans-shipment container terminal at Colombo Port in Sri Lanka.

APSEZ has set an ambitious goal to become the world's leading integrated transport utility company and the world's largest private port company by 2030.


Expanding our global presence

Actions taken in FY 2023-24		
Completed integration with Haifa Port	O&M contract for Dar es Salaam Port in Tanzania	Providing marine services in Sri Lanka, Oman and Mexico
Way forward		
Commissioning container terminal in Colombo, Sri Lanka by FY 2024-25	Expand globally in ports sector and explore replication of our offerings in logistics and marine services	Expand marine services offering to 5+ countries in FY 2024-25 and 15+ countries by 2030


Awards and accolades




'Non-Major Port of the Year' award at the "Maritime and Logistics Awards 2023"




Mundra Port won Sea Port of the Year (for Northern India) award at the 'Northern India Multimodal Logistics Awards'




Mundra Port secured a prestigious accolade as the non-major port of the year at the 10th International Samudra Manthan Awards 2023




Mundra Port was chosen as the 'Port of the Year – Containerised Cargo' at the Exim Star Awards




Mundra Port was felicitated with the "Best Port of the Year - Containerised" award at the Gujarat Star Awards




Ennore Container Terminal was awarded the 'Best Business Partner for FY 2022-23' for achieving the highest throughput within Kamarajar Port



AICTPL won two awards at the 7th Edition of Maritime Awards held in Mumbai - Best Port of the Year {Containerised & Non-Containerised in Private Sector} and Best Container Terminal of the Year (Volume)}



Ocean Sparkle Ltd. won the prestigious 'Best Company of the Year 2023' award from Berkshire Media Pvt Ltd and the 'Best O&M Operator' award by Paradip Port Authority



Adani Logistics awarded with the prestigious Logistics Excellence Advancement & Performance Shield 2023 (LEAPS) in recognition of excellence & innovation in the Multimodal Transport Operators Category

Environmental, Social & Governance (ESG) Initiatives

Globally, there is a growing realisation that ESG constitutes a critical aspect of business and value creation. Tax is an integral part of each element of the ESG agenda – compliance with environmental taxes; changing attitude to tax behaviours; increased transparency; and robust tax governance structures to ensure that tax policies reflect wider sustainability efforts.

Tax to ESG Metrics		
Environmental Tax in the E	Social Tax in the S	Governance Tax in the G
<ul style="list-style-type: none"> Environmental taxes, e.g., carbon taxes, plastic packaging tax Green subsidies and incentives Compliance and reporting requirements Carbon adjustment mechanism 	<ul style="list-style-type: none"> Social insurance, healthcare and pension premiums Gig economy, flexible workforce, and global mobility Equal pay, living wages, and remuneration policies 	<ul style="list-style-type: none"> Aligning ESG policy with tax behaviour Tax reporting and stakeholder communication Process controls and compliance assurance

APSEZ's ESG strategy is aligned with various national and international standards, frameworks, guidelines, and commitments such as TCFD, UNGC principles, NGRBC, GRI standards, IIRC, BRSR, SDGs and IBBI. The ESG principles are implemented throughout the project's lifecycle – from conception to the end of life – through material ESG topics across all business stages. APSEZ prioritises setting and implementing targets backed by an appropriate policy framework, approved by the Board of Directors and relevant committees.

Addressing stakeholder concerns and responding to the voice of various stakeholders, internal as well as external, is important to our ESG approach. We achieve this through continuous stakeholder consultations and grievance redressal initiatives.

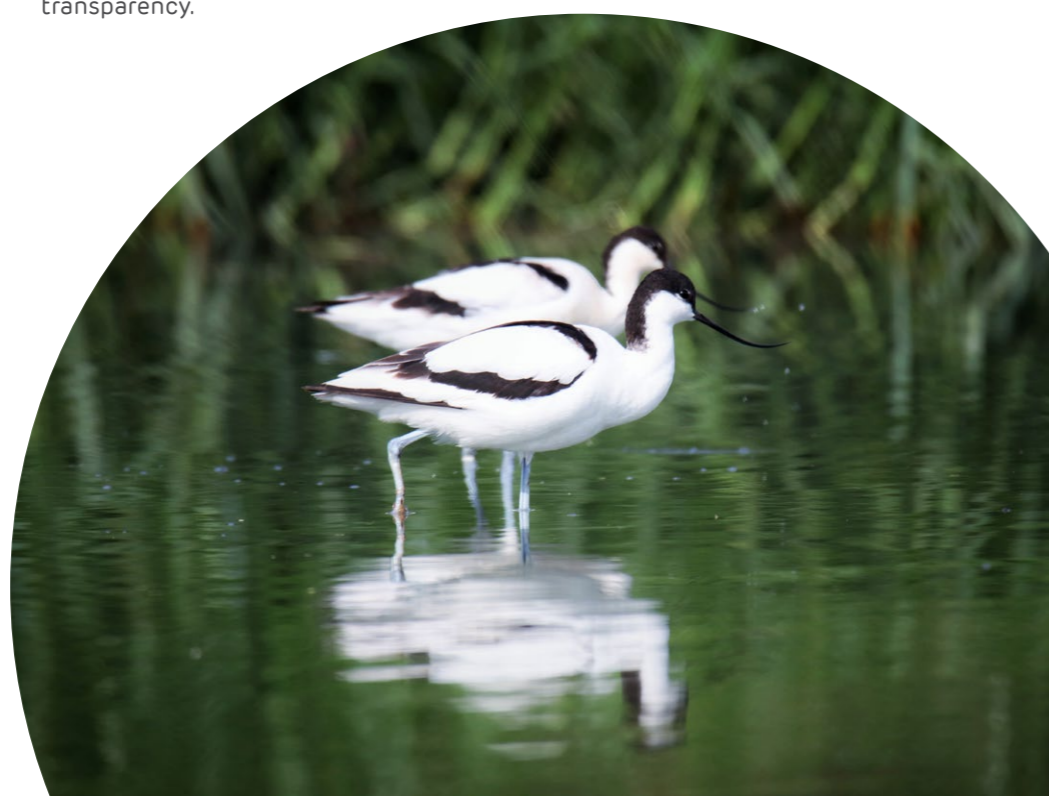
Our ESG commitment

We are committed to achieving carbon neutrality by 2025 and net zero emissions by 2040 through renewable capacity deployment and greening transportation.

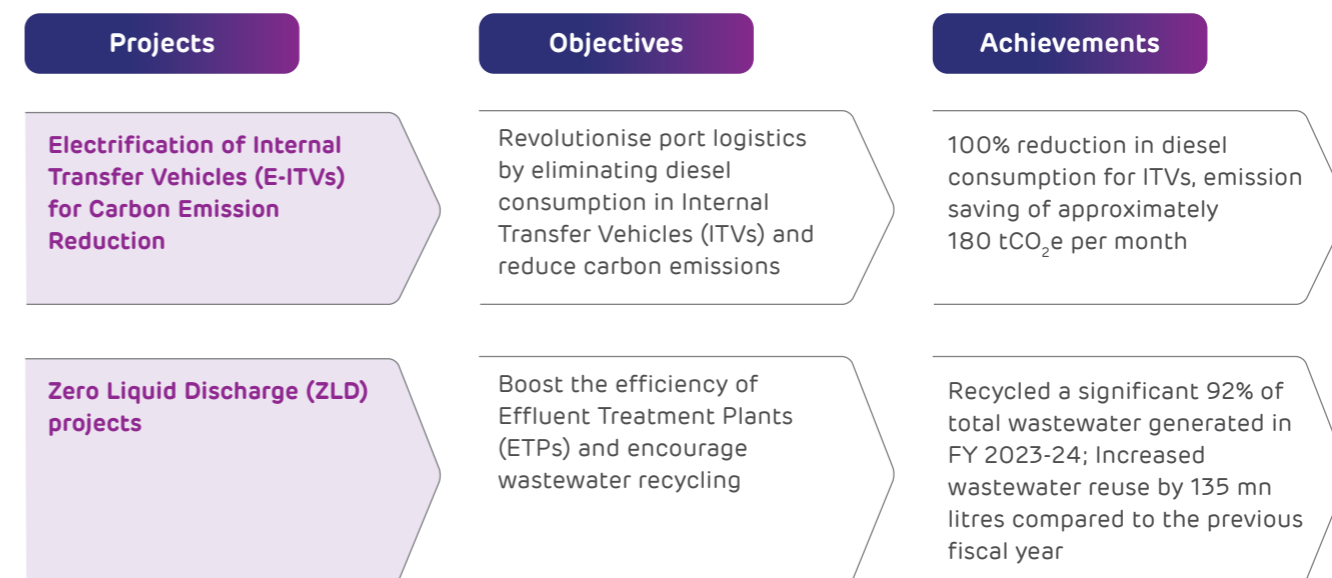
We also actively engage with local communities, promote employee well-being, and uphold the highest standards of ethical conduct and transparency.

Environmental

We have undertaken various projects to reduce our carbon footprint and boost the ecological environment in the regions of our presence.



Projects & campaign highlights



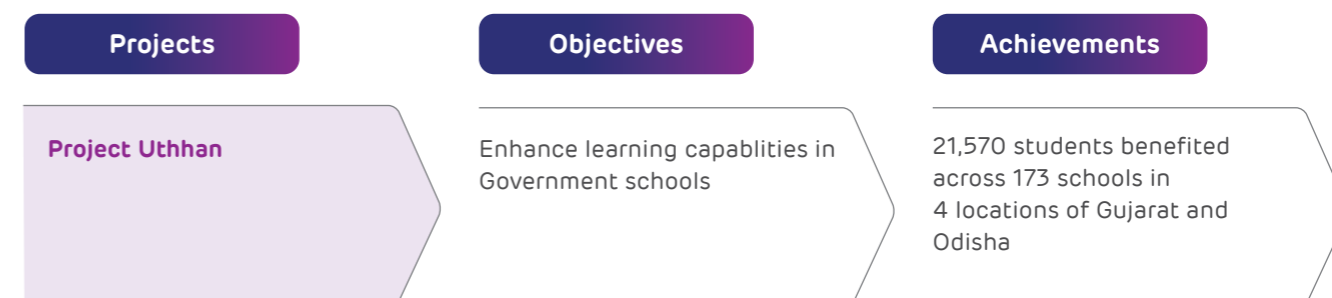
Targets achieved

Indicator	FY 2023-24 target	Actual achievement by FY 2023-24	2025 target
Renewable share in total electricity	15%	13%	100%
Energy intensity reduction	50%	51%	50%
Water consumption intensity reduction	60%	61%	60%
Water withdrawal from non-shared resources	55%	56%	80%
Waste intensity reduction	30%	52%	30%
Zero waste to landfill certification	6 ports	6 ports	12 ports
Mangrove afforestation	4,200 Ha	4,240 Ha	5,000 Ha
Terrestrial plantation executed	1,150 Ha	1,267 Ha	1,200 Ha

Social

In partnership with Adani Foundation, we are dedicated to fostering equitable and sustainable development for marginalised communities.

Educational Initiatives



Community Healthcare Initiatives

Projects	Objectives	Achievements
Deploying Mobile Healthcare Units (MHCU)	Offering free medical consultations, medications and home visits in villages	85,141 patients treated through MHCUs in FY 2023-24
Health Camps	Access to basic and specialised medical services in rural areas	48 health checkup camps organised in villages 11,281 patients benefited from the health camps

Sustainable Livelihood Development

Projects	Objectives	Achievements
Kamdhenu initiative - Dairy initiative in Dahej	Strengthen animal husbandry livelihood in 30 villages	Asset worth ₹ 1.23 crore, and with total milk production of 7,77,200 litres, employment for 42 families created

Community Development

Projects	Objectives	Achievements
Aahaar	Aahaar programme aims to provide high-quality, hot cooked meals at a minimal cost to those in need in urban areas of Odisha	1,56,000 meals were provided daily in Bhadrak district
Access to Clean Drinking Water, Dhamra	Availability of safe and clean drinking water in Dhamra, Odisha	Installed 15 hand pumps with wastewater recharge pits, benefiting 3,629 people with access to clean drinking water during fiscal year 2023-24
Support in the Aftermath of Train Accident	Supporting people in the aftermath of train accidents	Provided financial support of ₹ 18 lakh for complete education, up to high school, to 138 children who lost their parent(s) in the train accident

Targets achieved

Indicator	FY 2023-24 target	Actual achievement by FY 2023-24	2025 target
Voluntary attrition	6%	10%	< 4%
Employee satisfaction	4.2	3.95	4.5/5
Average employee training (days)	4.5	8	5 days
Supplier satisfaction	4.25	4.25	4.75/5
Customer satisfaction	4.25	4.5	4.75/5
Safety (fatalities)	Zero Incident	6	Zero Incident
Community-based skill development programme (no. of beneficiaries)*	1,00,000	1,22,510	1,00,000 enrolments
Women's self-help group (no. of groups formed)*	265	338	265
Access to primary education (Students)	15,000	21,570	25,000
Enhancing access to primary health (Mobile Health Care Units)	80,000	85,141	1,50,000
Enhancing green cover and promotion of biodiversity through tree plantation	1,51,000	1,64,038	1,60,000

* These KPIs have already been achieved

Governance







We remain committed to ensuring the highest standards of ethical and transparent governance across the operational and organisational hierarchy.

Indicator	Details
New Policy	Privacy Policy: Introduced the policy for personal data protection for concerned stakeholders.
Updated Policy	Stakeholder Engagement Policy: Redefined our approach and scope to engage with stakeholders.

UN SDGs



Awards and accolades

 APSEZ recognised among the top 50 Indian companies in sustainability by Business World	 Mundra Port won the 'Platinum Award' in the 'Environment Management' category by Grow Care India at the 7 th Annual Environment Awards in April 2023 at Delhi	 Kattupalli Port won its first ever Platinum Award for Sustainability by APEX India Green Leaf
 Krishnapatnam Port won the prestigious Gold Award at the CII Andhra Pradesh Industrial Safety Excellence Awards 2023	 Vizhinjam Port received the International Safety Award 2023 from the British Safety Council	 APSEZ, Mundra was awarded Platinum Award by Sustainability Foundation under the "Environmental Preservation" category



Part 4 Tax Overview

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31 Tax and Transparency

31 Tax Transparency and Governance

33 The Tax Universe

Tax and How its Perception has Evolved

Overview

Recent years have witnessed a fundamental transformation in the way tax is perceived. From being seen as a cost for staying in business and a licence to operate, tax is now being increasingly accepted as a welcome and voluntary initiative, communicating private contributions to public finances and making it possible for the government to provide society with an enabling platform. A new generation of corporate thinkers are, in fact, placing tax at the centre of the governance circle, treating it as a valuable contribution that empowers governments to provide citizens with a range of facilities

and benefits rather than as an expense entry in their books.

This evolved tax perception is also commensurately driving an increased emphasis on transparent explanations by companies on vital tax-related issues, such as policies related to tax management, quantum of various taxes, process of tax computation, compliance discipline that makes timely payment a reality, the operating structure that makes timely

compliance possible, and periodic checks (audits) covering the discipline. This has made tax responsibility a subject central to good governance, and has necessitated a separate document called the Tax Transparency Report.



Tax and Transparency

Overview

With the global tax environment entering a new age, forward-looking companies are voluntarily bringing out the Tax Transparency Report even though the same is not mandatory. Through the report, such companies seek to drive wider stakeholder attention and greater credibility, besides creating the basis for the highest standards of tax transparency.

The emergence of this subject as one of the levers of long-term value creation for the wider stakeholder community has been led by the growing shift towards complete corporate transparency, along with the need to clearly describe the interpretation used by a company to arrive at its tax computation. The Tax Transparency Report helps stakeholders make informed investing decisions by

understanding the nature of the Company's tax jurisdictions and the quantum of their tax payments. It contributes to better stakeholder perception and valuation.

For companies, such reporting helps in strengthening their stakeholder recruitment and retention, leading to enhanced business sustainability. It further aids them in distinguishing between

the taxes received on behalf of the government and on the profit generated by them, enabling a more informed understanding. Such documentation also provides a consolidated picture on a company's holistic contribution (statutory taxes and levies) towards economic development and sustainability through tax payments, which is essential for corporate credibility.

The broad structure of the tax transparency report is inspired by Global Reporting Initiative 207 ('GRI') issued by the Global Sustainability Standards Board and inspired by global best practices. In addition to the tax and other contributions made to the exchequer, the report further elaborates on our outlook on taxation and how responsibly and effectively we have designed our tax principles.

Tax Transparency and Governance

Overview

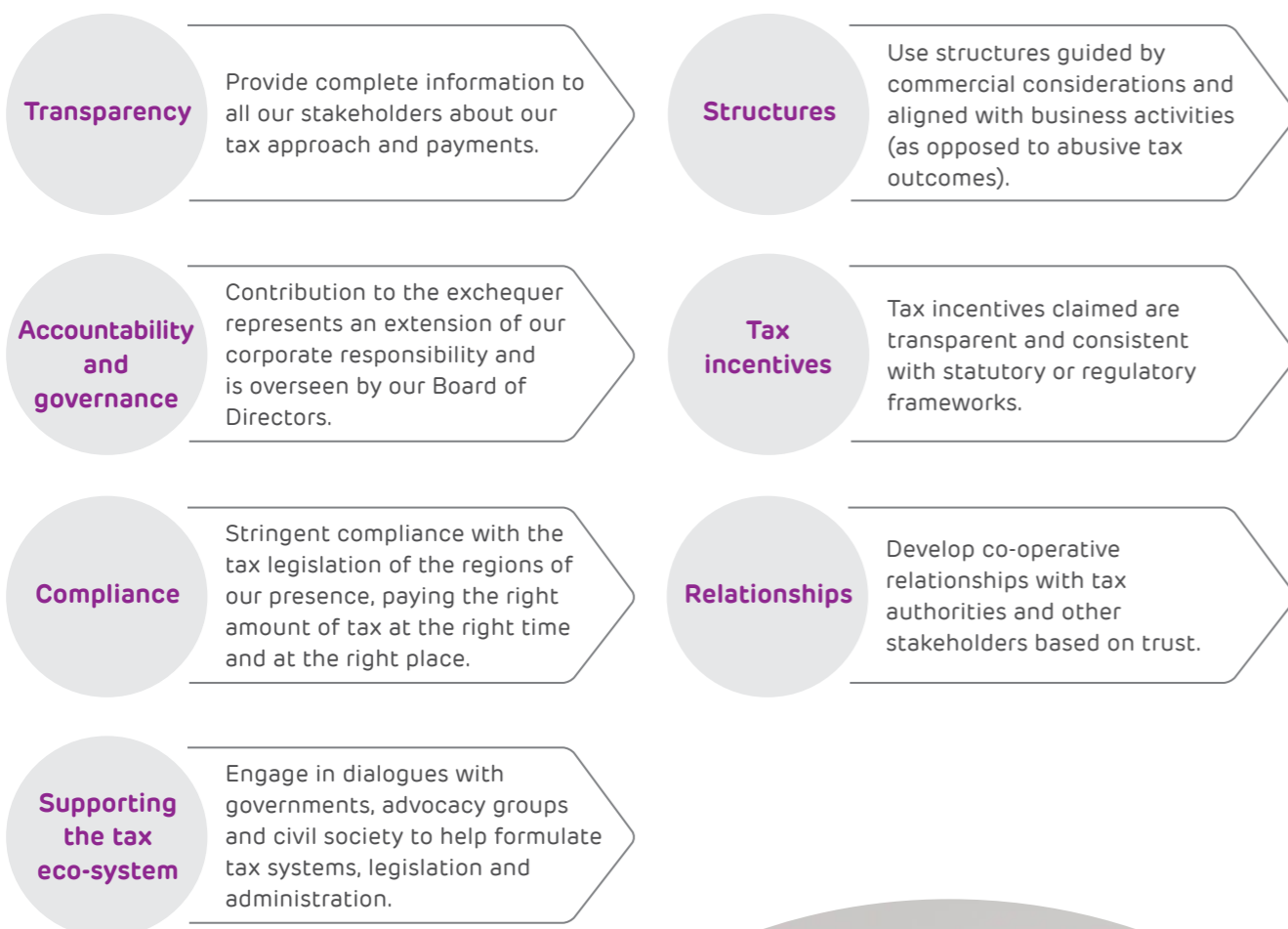
Amid the growing acceptance of tax treatment as a subject integral to a company's governance commitment, Adani portfolio perceives its tax and related payments as an important measure of its character and growth strategy. We look at the government as the biggest stakeholder in our business, providing us with the platforms and freedoms needed to stay and grow in business. We view tax transparency as one of the most significant levers of corporate intent and pedigree, and

believe that our contribution to the exchequer makes it possible for the government to reinvest in enabling infrastructure, which accelerates the virtuous national cycle. In our opinion, enhanced disclosures can be transformed into a deeper stakeholder understanding and competitive advantage.

Adani portfolio's governance commitment ensures that tax affairs are managed ethically and methodically, leading to stakeholder assurance. Our tax teams engage with the business teams to

understand the operating models of transactions, and tax decisions are initiated by competent tax professionals in collaboration with experienced business colleagues and senior management. To replicate progressive practices, the Group facilitates an exchange of best practices among the Adani Group constituent, through standard operating procedures and policies that guide compliance and periodic reassessment of the financial controls embedded in processes.

Responsible tax principles



The Tax Universe

At Adani portfolio, we are an intermediate collector of tax on behalf of the government that is then paid, besides being a payer of tax in our own right. This dual role puts a premium on our capacity to transparently report collections, disbursements and payments.

The corporate tax range we cover

Direct contribution	Indirect contribution	Other contributions
Corporate tax on income	Withholding tax	Social security
Indirect tax borne	Indirect tax	
Government Royalty	Waterfront Royalty	
Other charges	Other taxes	

Our tax transparency structure





Part 5

Our Approach to Tax

36 Introduction

36 Our Approach to Tax

Introduction

At Adani portfolio, we consider tax as a material topic that plays a significant role in making economic and social contributions (sustainable development goals). This commitment is aligned with our vision to be a world-class leader in businesses that enrich lives and contribute to nations in building

infrastructure through sustainable value creation. We believe that companies are under an obligation to comply with prevailing tax legislations; the management owes a responsibility to stakeholders to address expectations of good tax practices.

APSEZ is fully committed to complying with the applicable tax laws of respective countries, and paying its fair share of taxes to government(s). The Company's approach to tax balances compliances with business activities, and articulates the Group's strategies and processes.

Our Approach to Tax

Fundamentals



Compliances



Disclosures and Reporting



Tax Strategy



Risk Management and Dispute Resolution



Related Party Transactions and Transfer Pricing



Tax Governance



In-house Tax Team



Tax Processes and Controls



Advocacy



Engaging with Tax Authorities



Compliances

We endeavour to be fully compliant with applicable tax laws in the geographies of our presence, and to fulfil all the statutory obligations in those countries, which means setting the threshold at zero-tolerance towards non-compliances or any compliance delays.

In view of this, our vision is to create efficient systems from a tax governance perspective (including compliances). We will continue to seek the assistance of tax advisors,

whenever warranted, to ensure a complete and timely compliance with applicable regulations.

Our operational framework comprises an annual compliance calendar that tracks/monitors statutory due dates. These compliances are monitored in real-time. A system of checks and balances (preparer-reviewer-approver) ensures that no compliances are deferred or missed.

This system is reviewed periodically and aligned with regulatory changes, ensuring that it remains

contemporary. This ensures that the system is adaptive, responsive and relevant. It is our endeavour to set internal timelines for statutory compliances and meet such internal timelines. We endeavour to ensure that there are no lapses in adhering to the statutory timelines, and that we set a benchmark for others in the industry to follow.



Disclosures and Reporting

At APSEZ, we focus on transparency and standards related to disclosures/reporting on how tax matters are managed. This report is a validation of the

commitment. As a policy, we disclose what is required under law and extend beyond, setting a standard in terms of disclosures/reporting. We view appropriate disclosures and reporting as an opportunity to engage with key

stakeholders. The objective of such disclosures/reporting is to increase transparency and promote credibility, leading to stakeholder trust (government, regulators and investors).



Tax Strategy

As a principle, we believe in paying our fair share of taxes without seeking to circumvent, avoid or evade taxes. We endeavour to operate businesses efficiently and create value for shareholders. In this context, tax optimisation is undertaken with a commercial rationale, and with the substance of the transaction at the helm.

We track tax laws and concessions on a global scale, seeking to optimise our tax exposure within available guardrails. Our tax planning is guided by a sense of integrity. The result is that we claim tax incentives/deductions, as legitimately available in the countries, aligned with our strategy and relating to investments and economic substance.

The international tax landscape has been rapidly evolving following the inception of base erosion and profit shifting ('BEPS') project of G20/Organisation of Economic Co-operation and Development. BEPS attempts to ensure that

profits are taxed in the country of economic activity and value creation. India has been an extremely active participant in this regard.

All multinational corporations are impacted by changes in the international tax framework as they operate across borders in multiple countries. Currently, under BEPS 2.0 – Pillar 1 and Pillar 2 are work-in-progress for implementation. Pillar 1 reallocates certain portion of the residual profits to the market jurisdiction, while Pillar 2 lays down a global minimum tax rate of 15% in the countries in which such multinational corporations operate. While many jurisdictions are moving forward with the implementation of Pillar 2, consensus on Pillar 1 is uncertain. Pillar 2 is designed to create a more equitable tax environment, enhance revenue protection for countries facing tax base erosion, and promote more stable and predictable international tax policies. This transformative approach supports a fairer global

economy. While it may involve adjustments to domestic tax laws, international agreements, and increased administrative responsibilities, it also encourages robust international cooperation to achieve its goals.

Be that as it may, Adani Group has proactively evaluated the implications under Pillar 1 and Pillar 2. This provides a greater certainty in terms of the tax impact, and leads to the development of a robust tax function.

The Company invests in a location with a goal to build long-term relationships with investors, respective governments, employees and local communities. Taxes collected and paid by the Company, globally, on behalf of the government, is a representation of its adherence towards responsible practice as an organisation.

All tax returns and tax audit reports were filed within statutory due dates



Risk Management and Dispute Resolution

We do not adopt aggressive tax positions; we are committed to positions with an underlying substance and commercial activities/rationale. Wherever significant positions are taken, we seek advice from external experts/senior counsels at applicable jurisdictions. We follow sustainable global tax practices with high governance. We identify global tax risks with the perspective that they may be avoided/mitigated. This approach comprises tax risk

analysis and aligns with governance best practices. Our tax governance framework focusses on how tax risks are identified, managed, monitored and mitigated.

We do recognise that there could be differences of opinion with the tax authorities, potentially leading to disputes. APSEZ focusses on proactively presenting relevant facts before the tax authorities with comprehensive documentation and a transparent dialogue. In respect of tax disputes, the assistance of external tax experts and senior counsels could be sought.

As a measure of corporate predictability, we periodically review the tax risks to ascertain tax position changes in the context of an evolving tax landscape (law changes, subsequent judicial precedents etc.). The key positions adopted are appropriately documented along with the basis for the same. Material tax matters are reported to the committee/sub-committee of Board of Directors, as considered appropriate.

Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015 and Income-tax Act, 1961. The policy regulates related party transactions to ensure proper transaction approval, disclosure and reporting.

Based on this policy, the companies identify related party transactions and obtain approvals (e.g. Audit Committee) for these transactions. The Board of Directors reviews related party transactions, and supporting documentation is provided to the Board of Directors

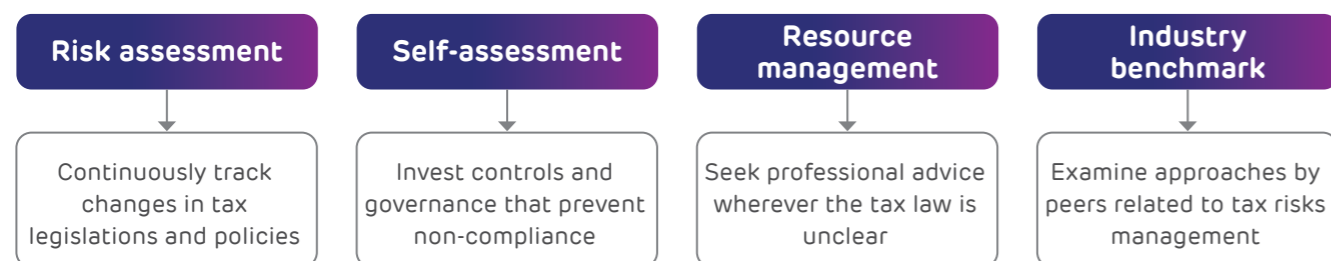
to substantiate such transactions on an arm's-length principle and in the ordinary course of business.

Adani portfolio's transfer pricing framework covers transfer pricing filings with the tax authorities. Such filings include country-by-country reporting and the master file. These filings transparently report the key business aspects (e.g. number of employees in a country, third party revenues, intra-group revenues) to the tax authorities. The transfer pricing documentation, as specified under

the income tax laws, is maintained for related party transactions, and such transactions are also undertaken on an arm's-length basis, as required under income tax laws. To determine the arm's-length price, a FAR (functions performed, assets employed, and risks assumed) analysis and benchmarking exercise is undertaken internally or externally (as considered appropriate). This framework is directed to a standardised uniform practice across Adani portfolio entities.

All transfer pricing tax filings are completed within statutory due dates

Our tax risk management approach



Related Party Transactions and Transfer Pricing

Adani portfolio enters related party transactions with portfolio companies in the following manner:

- Adani portfolio is one of the most dynamic infrastructure and utilities platforms, with a significant expertise across the value chain for infrastructure development. Its operation

and maintenance practices are benchmarked to global standards. It assists portfolio companies in executing projects efficiently, with in-house resources.

- When financial support is provided by the parent company to subsidiaries, the transfer price is determined considering factors like commercial expediency, envisaged cash flows, profitability, etc.

- Since Adani portfolio companies are built around adjacencies within businesses inter-se, there are synergies and business exigencies for inter-company flow of goods and services, leading to related party transactions.

APSEZ adopted a related party transaction policy, framed around the provisions of the Companies





Tax Governance

Our endeavour is to practice best-in-class tax governance. Our tax function is managed ethically and professionally by our proprietary tax team, comprising dedicated professionals led by subject matter experts and supported by external tax specialists (whenever needed). This tax team has formulated standard operating procedures, replicating

international best practices with the objective to follow uniform and standardised procedures. The highest body for decision-making/overseeing tax aspects is the Board of Directors.

APSEZ's macro-level tax governance structure comprises:

- Board of Directors
- Audit Committee, Risk Management Committee,

Mergers & Acquisitions Committee, Legal, Regulatory and Tax Committee

- Group Chief Financial Officer/Group Financial and Management Controller
- Chief Financial Officer/Financial Controller
- In-house Tax Team (dedicated tax professionals)



In-House Tax Team

Adani Group has a top-notch dedicated tax team comprising senior tax professionals. This in-house team focusses on all facets of tax, and reports to the Chief Financial Officer / Financial Controller on key aspects. APSEZ has its own finance and tax team, and this is supported by Adani Group's corporate tax team (both referred to as in-house tax team). The in-house tax team collaborates with businesses to provide sound tax advice regarding implications of business decisions/ agreements/ transactions. On account of

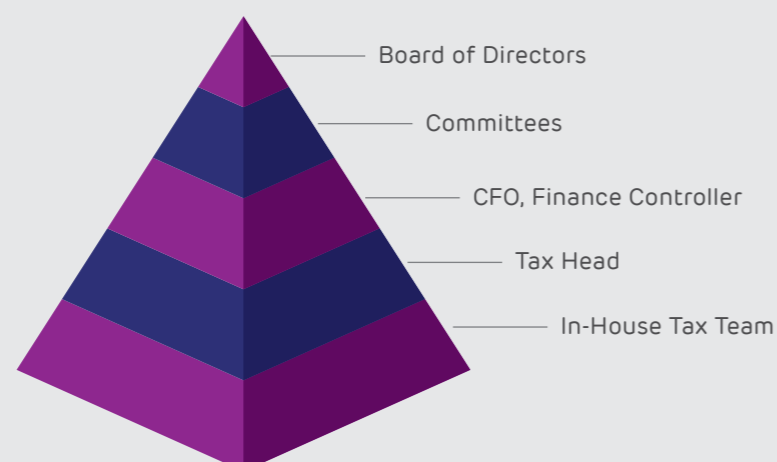
interpretation issues with respect to tax laws, there could be an uncertainty or complexity regarding tax implications. In such a scenario, assistance is sought from external professional advisors and senior counsels (as required). A similar practice is also adopted for significant mergers and acquisitions undertaken.

APSEZ's robust framework addresses dynamic tax laws by focussing on training and updates of latest tax developments (judicial pronouncements). Regular tax updates from multiple sources and key updates are disseminated to the

relevant stakeholders internally (e.g. businesses), facilitating informed decision-making. The in-house tax team also participates in topical training (external seminars cum conferences as well as internal discussions).

The in-house tax team is responsible for the implementation of tax functions and principles by identifying, evaluating and advising on tax laws. This team also focusses on building effective tax processes and bringing a uniformity in tax compliances.

The periodic meetings of the Board of Directors review strategic tax matters. In the event of mergers and acquisitions, a due diligence exercise covers risk mitigation and certainty perspectives.



Our tax risk management approach:



Headed by professional with 25+ years of experience



130+ dedicated tax professionals



Average 10+ years of experience

Legal, Regulatory & Tax Committee

- Exercise oversight with respect to the structure, operation and efficacy of the Company's compliance programme
- Review tax matters that may have a material impact on APSEZ's financial statements and

disclosures, reputational risk, or business continuity risk

- Review compliance with applicable laws and regulations
- Review significant enquiries received from, and reviews by, regulators or government agencies, including issues

pertaining to compliance with various laws

- Consider and action tax risk management issues that are brought to the attention of the Committee



Tax Processes and Controls

Adani portfolio has robust processes and controls to address its tax obligations, whether related to the payment of taxes or undertaking tax compliances. These processes

comprise tracking and monitoring pending tax litigation and necessary compliances required to be legally undertaken. It also includes real-time status monitoring. Standard operating procedures are

built for tax processes, with the objective to follow uniform and standardised procedures. From a control's perspective, the concept of checks and balances is in place (maker-reviewer-approver).



Comprehensive Tax Compliance Calendar



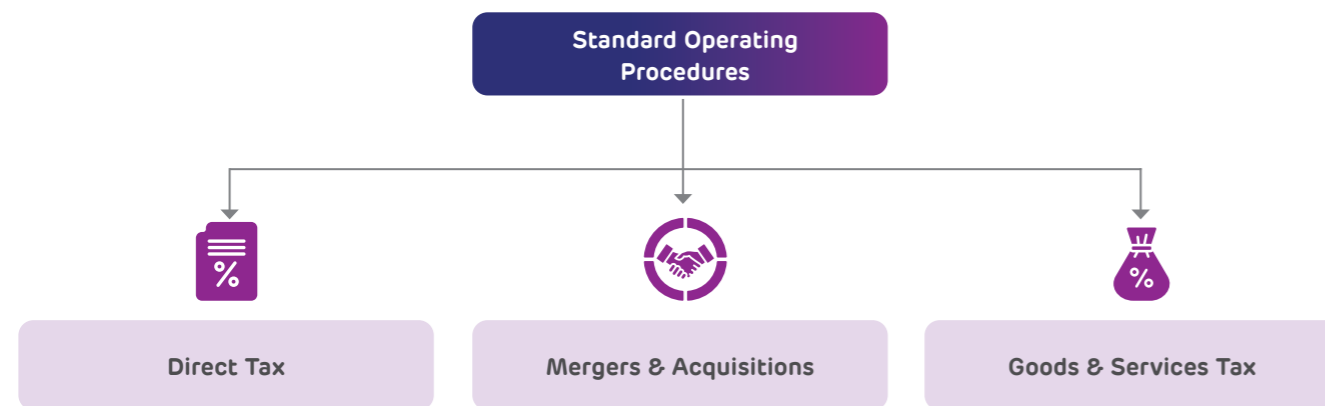
Maker-Reviewer-Approver Approach



Standard Operating Procedures

APSEZ increasingly leverages technology tools to supplement the human interface, helping automate tax processes. Extensive technology changes drive efficiencies related to tax aspects. A repository for the archival of historical and current tax data/documents has helped build a safeguard against subsequent data non-availability.

An internal audit covers tax, and encompasses the effectiveness, efficiency and adequacy of internal control systems and adherence to various frameworks, policies and procedures.



Tax Technology

At Adani Group, we lead the way in innovation, embracing emerging technologies long before they become mainstream. Our proactive adoption of advanced tax technology reflects a strategic

commitment to elevating efficiency and compliance in managing our global tax responsibilities. By integrating state-of-the-art tax solutions, we streamline processes and optimise our tax strategies, setting the stage for sustainable

growth and securing a competitive edge. Our forward-thinking approach not only anticipates future trends but also drives our mission of operational excellence and leadership in the industry.

Illustrations of leveraging on tax technology:



Online income tax notice tracking



Automation in direct tax, such as withholding tax compliances, returns, etc.



Automation of lower withholding rate in SAP for vendors



Automated GST ITC reconciliation process



Advocacy

At APSEZ, we have developed an advocacy framework, leading to a constructive and transparent dialogue with governments and policymakers across all tax facets (policy, legislation and administration) in the jurisdictions where we operate. These advocacy initiatives are engaged either

directly by APSEZ or through relevant industry bodies, with the objective of appropriate representation before the Government and policymakers on key tax issues/concerns that impact business or lead to unintended consequences.

APSEZ identifies issues impacting business on account of the

changing landscape; it considers advocacy as an opportunity to present not only its concerns, but also partner with / represent the larger industry and engage with policymakers on key growth drivers for the country / industry.



Engaging with Tax Authorities

Our engagement with the tax authorities is transparent and co-operative. Our endeavour is to disclose relevant and complete facts to the tax authorities for their assessment. Our representations to the tax authorities are typically undertaken by the external professional advisors engaged by APSEZ, supported by our

proprietary tax team in line with our standard approach for representing / communicating with the tax authorities. APSEZ obtains

withholding tax orders / other certificates from the tax authorities in advance, from a risk mitigation and certainty perspective.





Part 6 The Numbers

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49 The Basis of Preparation

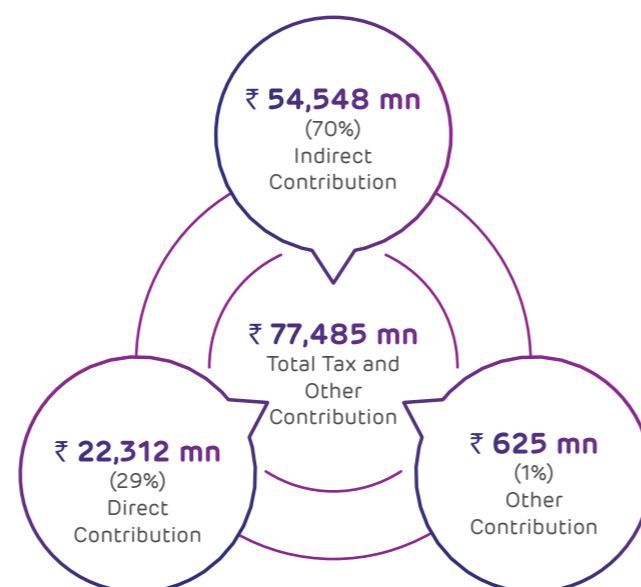
51 Independent Reasonable Assurance Report

Our Contribution to the exchequer: Global Tax and Other Contributions

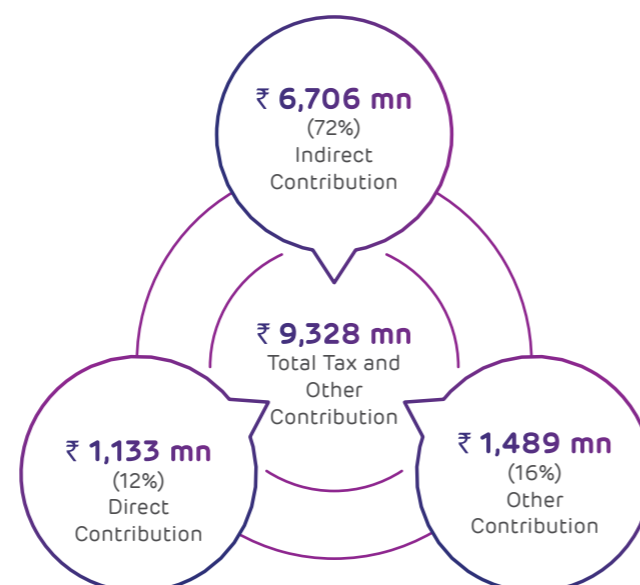
In the earlier section of this report, we have outlined our approach to tax to share the organisation's perspective towards tax. Further to the above, we have presented a summary of the Global Tax and Other Contributions made to the Government, Ministries, Local Authorities, etc. ('exchequer') during the financial year 2023-24. Such Global Tax and Other Contributions are captured under the following broad categories:

- Direct contributions include payments made by APSEZ and its subsidiaries directly to the exchequer, such as corporate tax, indirect tax borne, government royalty, and other charges
- Indirect contributions include payments made by APSEZ and its subsidiaries on behalf of other stakeholders, such as withholding tax on vendor payments, withholding tax on payroll, Goods and Services Tax ('GST') on outward supply & services, Waterfront Royalty, etc.
- Other contributions are non-tax payments made by APSEZ and its subsidiaries, such as provident fund and employee state insurance

Overall Snapshot - Tax and Other Contributions (India Business Operations)

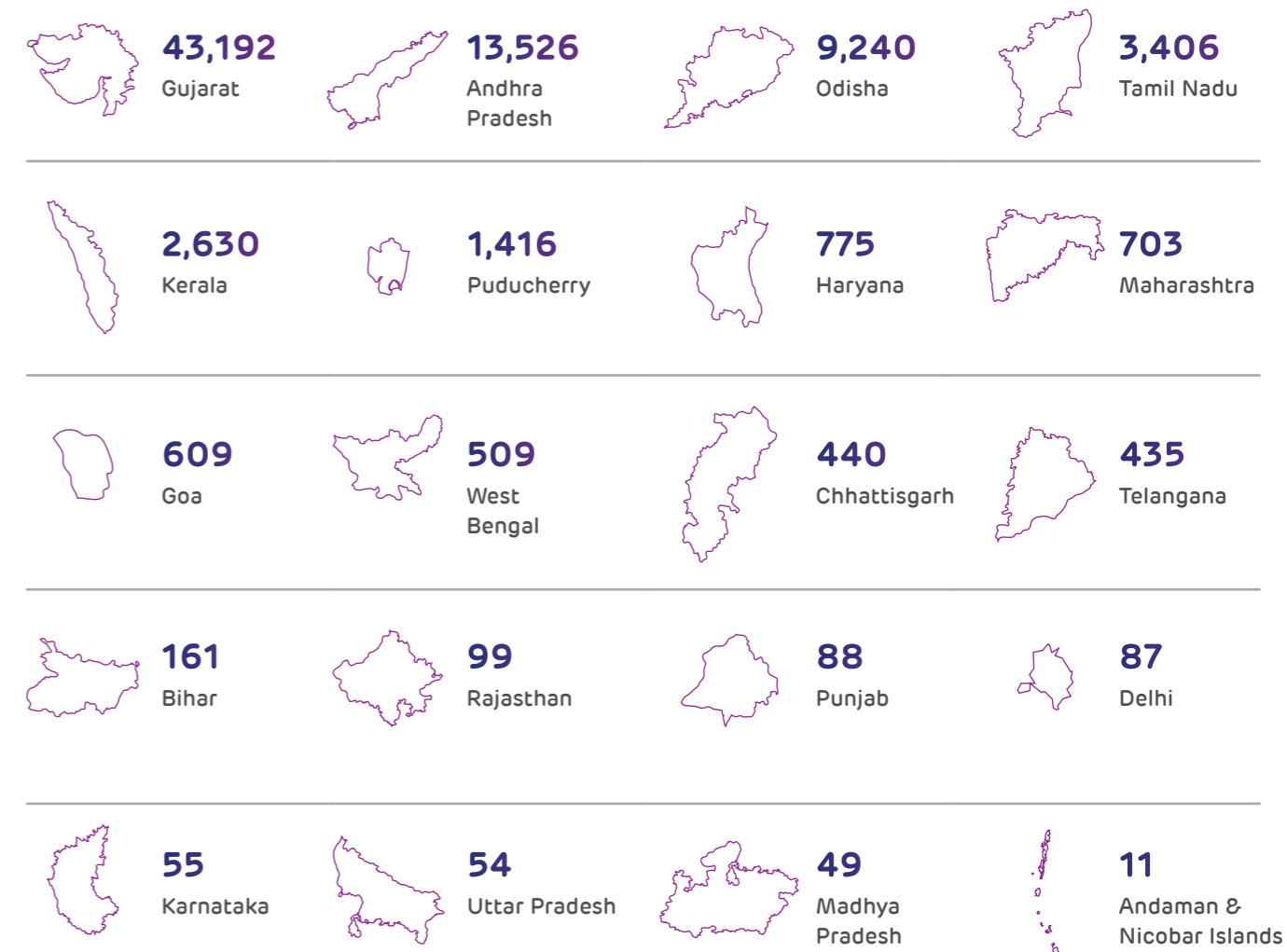


Overall Snapshot - Tax and Other Contributions (Overseas Business Operations)



State-wise Tax and Other Contributions (India Operations)

(₹ in mn)



Map not to scale (for representation purposes only)

Country-wise Tax and Other Contributions

(₹ in mn)

Country*	Direct Contribution				Indirect Contribution				Other Contribution	Total
	Corporate Tax	Government Royalty	Indirect Tax Borne	Other Charges	Indirect tax	Withholding Tax	Waterfront Royalty	Other Taxes	Social Security	
India	11,767	5,874	2,907	1,764	44,253	6,018	4,267	10	625	77,485
Israel	-	-	-	223	-	3,353	-	-	1,460	5,036
Australia	244	-	-	-	1,429	544	-	79	-	2,296
Singapore	646	-	-	20	576	720	-	-	6	1,968
Sri Lanka	-	-	-	-	-	5	-	-	23	28
Total	12,657	5,874	2,907	2,007	46,258	10,640	4,267	89	2,114	86,813

* Tax and Other Contributions pertaining to Bangladesh have not been considered since it is below ₹ 1 mn.



Contribution-wise snapshot - (Global Tax and Other Contributions)



The Basis of Preparation

This section provides the scope and methodology for the collection and reporting of data on the Tax & Other Contributions made directly and indirectly to the exchequer. Such data is reported in the section "Our Contribution to exchequer – Global Tax & Other Contributions".

The data reported is for the period April 1, 2023 to March 31, 2024, and is based on the data used in the preparation of the Integrated Report for the year ended March 31, 2024. We have reported the Global Tax and Other Contributions on a cash basis, unless otherwise mentioned. The base information used to compute Global Tax and Other Contributions is the same as that for the audited financial statements of respective companies with inherent differences in the accounting methodology. Any amounts resulting from foreign exchange fluctuations have been excluded while calculating contribution, as these amounts are not paid to any government entity and arise solely from book entries.

We have categorised the Global Tax & Other Contributions as follows:

- **Direct contribution:** It represents taxes, duties and other charges borne by APSEZ and its subsidiaries.
- **Indirect contribution:** It represents taxes and duties collected and paid on behalf of other stakeholders by APSEZ and its subsidiaries.
- **Other contribution:** It represents social security contributed for the benefit of the employees.

This Report lists out the Global Tax & Other Contributions paid to the exchequer by APSEZ and its subsidiaries. In this context, we have considered the individual financial statements of each portfolio company in the respective jurisdiction. If there is more than one portfolio company in a jurisdiction, the information has been reported on an aggregate basis at the country level. Such contributions are reported at gross amounts.

In addition to the Global Tax & Other Contributions to the exchequer, we have also incurred social expenditures in the form of Corporate Social Responsibility (CSR) related contributions, which are not considered under this report as such amounts are not paid to the exchequer.

The grouping of Global Tax & Other Contributions under the heads of 'Direct Contribution', 'Indirect Contribution' and 'Other Contribution' are based on our understanding of the nature of the payment and its payment mechanism.

1. Direct Contribution

a. Corporate Tax on Income: This represents the actual taxes paid directly on the taxable profits of APSEZ and its subsidiaries during the financial year 2023-24. It includes the taxes withheld by third parties while making payment to APSEZ and to its subsidiaries, i.e. taxes withheld by the customers or taxes collected by the third-party vendors. State-wise contributions

are determined based upon PAN (Permanent Account Number) jurisdiction of these entities for each state.

Since these taxes are reported on a cash basis, it may also include the tax paid in respect of the income tax liability for earlier years at respective corporate tax rates applicable for those years, if those were paid during the financial year 2023-24. Typically, these taxes would be reflected in corporate income tax returns made to the exchequer, and tend to become payable, and are paid, either directly by way of advance tax or self-assessment tax or through credit of withholding tax, either in the year the profits were made or up to one year later.

- b. Indirect Tax Borne:** This represents goods and services tax borne, VAT / Excise borne and customs duty borne. State-wise contributions have been considered in the states where goods or services are consumed.
- c. Government Royalty:** This represents payment of revenue share to the port authorities. State-wise contributions have been considered in the state where the port is located.

d. Other Charges: This represents stamp duty, environmental contributions, license fee, electricity duty borne and any other similar contribution by APSEZ and its subsidiaries. State-wise contributions have been considered in the state where other charges are paid by the Company.

2. Indirect Contribution

a. Withholding Tax

i. Suppliers and Vendors: These represent taxes withheld by APSEZ and its subsidiaries on various payments made to the suppliers and vendors and deposited with the exchequer on behalf of such service provider.

ii. Payroll Taxes: These represent taxes withheld from the salary payments made to the employees and deposited by APSEZ and its subsidiaries to the exchequer. Typically, these taxes would be reflected in payroll tax returns made to the exchequer, and tend to be payable, and are paid, on a periodic basis throughout the year.

We have also presented state-wise contributions of these taxes according to TAN registrations of APSEZ and its subsidiaries under each state.

b. Indirect Tax:

This includes GST collected and paid to the exchequer on a gross basis. State-wise contributions have been determined based

on the state in which the Company has paid the tax to the exchequer.

c. Waterfront Royalty:

This represents payment towards waterfront royalty collected and paid to the port authorities. State-wise contributions have been considered in the state where the port is located.

d. Other Taxes:

This includes professional tax withheld and deposited with the exchequer. State-wise contributions are determined based upon PAN (Permanent Account Number) jurisdiction of APSEZ and its subsidiaries for each state.

Refunds received, if any, have not been deducted for the purpose of Global Tax & Other Contributions. Separately, interest on tax is included in the Global Tax & Other Contributions, while penalty paid (if any) is not included. The withholding tax deducted on payments to Group entities have been reported under indirect contributions, and the corresponding payees have reported

the same under direct contributions as tax on their income.

3. Other Contribution

a. Social Security:

Social security contributions are obligatory payments to the exchequer that entitle employees to receive a future social benefit, such as Provident Fund and Employee State Insurance, which are solely for the benefit of employees. State-wise contributions are determined based on registration in the state under relevant recognised authorities, such as Employees Provident Fund Organisation of APSEZ and its subsidiaries.

The amounts reported as Global Tax & Other Contributions are based on the periodic forms, returns, challans, and other relevant documents filed with the exchequer.

An effort has been made to report various types of taxes, duties, levies and contributions. Any omission, inclusion or exclusion, other than that specifically mentioned, is unintentional and not expected to have any material impact on the disclosures.

Currency: Global Tax & Other Contributions disclosed in this report are in Indian National Rupees (INR) and are rounded off to the nearest Million (mn). The data on Global Tax and Other Contributions to the government, provided by any subsidiary in their local reporting currency, has been converted to INR using the exchange rate applied in the preparation of Form AOC-01 included in Integrated Report published for FY 2023-24.

Coverage: Please refer to Annexure 1 of the Report for list of taxes and other contributions by APSEZ in various countries and Annexure 2 of the Report for list of entities covered.

Independent Reasonable Assurance Report

To

The Board of Directors of Adani Ports and Special Economic Zone Limited,

Adani Corporate House,
Shantigram,
Near Vaishno Devi Circle,
S. G. Highway, Khodiyar,
Ahmedabad 382 421,
Gujarat, India.

Report on the audit of the Global Tax & Other Contributions included in the Tax Transparency Report of Adani Ports and Special Economic Zone Limited ('APSEZ') for the Financial Year 2023-24

We ('BDO India LLP' or 'BDO') were engaged by the management of Adani Ports and Special Economic Zone Limited ('the Company') to report on 'Global Tax & Other Contributions' contained in the Tax Transparency Report of the Company and its subsidiaries for the financial year 2023-24, in the form of an independent reasonable assurance conclusion about whether APSEZ's statement that the Global Tax & Other Contributions is properly prepared, in all material respects, and, based on 'Basis of Preparation' attached to the Tax Transparency Report, is fairly stated.

Management's Responsibility

The management of the Company is responsible for the preparation and presentation of the Global Tax & Other Contributions for the financial year 2023-24 in accordance with the 'Basis of Preparation', and

for designing, implementing and maintaining such internal control as the management determines is necessary to enable the preparation and presentation of the Global Tax & Other Contributions for the financial year 2023-24 that is free from material misstatement, whether due to fraud or error. The management of the Company is also responsible for preparing the Basis of Preparation.

In preparing the Global Tax & Other Contributions for the financial year 2023-24, the management of the Company is also responsible for ensuring the efficient conduct of its business, including adherence to the Company's policies, the safeguarding of its assets, implementing and maintaining internal control, preventing and detecting frauds and errors, ensuring the accuracy and completeness of the accounting records, and identifying and ensuring that it complies with the laws and regulations applicable to its activities.

Those charged with governance are responsible for overseeing the Company's and its subsidiaries' financial reporting process.

Independent Auditor's Responsibility

Our responsibility is to examine the Global Tax & Other Contributions prepared by the Company, and to report thereon in the form of an independent reasonable assurance conclusion based on the evidence obtained. We conducted our engagement in accordance with the International Standard on Assurance Engagements (ISAE)

3000: Assurance Engagements Other than Audits or Reviews of Historical Financial Information issued by the International Auditing and Assurance Standards Board, which requires that we plan and perform our procedures to obtain reasonable assurance about whether the Global Tax & Other Contributions for the financial year 2023-24 is properly prepared and free from material misstatement, whether due to fraud or error.

Reasonable assurance is less than absolute assurance, and is not a guarantee that an audit conducted will always detect a material misstatement when it exists.

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which is founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.

The procedures selected depend on our judgement, including the assessment of the risks of material misstatement of Global Tax & Other Contributions whether due to fraud or error. In making those risk assessments, we have considered internal control relevant to the preparation and presentation of Global Tax & Other Contributions in order to design assurance procedures that are appropriate in the circumstances, but not for the purposes of expressing a conclusion as to the effectiveness of the Company's internal control over the preparation and presentation of



Global Tax & Other Contributions. Our engagement also included assessing the appropriateness of Global Tax & Other Contributions, the suitability of the Basis of Preparation used by the Company in preparing the Global Tax & Other Contributions in the circumstances of the engagement, evaluating the appropriateness of the procedures used in the preparation of Global Tax & Other Contributions, and the reasonableness of estimates made by the Company and evaluating the overall presentation of the Global Tax & Other Contributions.

Our opinion

In our opinion, the Global Tax & Other Contributions for the financial year 2023-24 is properly prepared, in all material respects, in accordance with the 'Basis of Preparation'. Our opinion has been formed on the basis of, and is

subject to, the matters outlined in this report.

This report is not issued under any statute/law.

Restriction on use

In accordance with the terms of our engagement, this independent reasonable assurance report on Global Tax & Other Contributions has been prepared and issued at the request of APSEZ solely for inclusion in its Tax Transparency Report for the financial year 2023-24, and should not be used by any other person or for no other purpose or in any other context. We are appointed to only verify the Global Tax & Other Contributions in accordance with the Basis of Preparation shared with us of APSEZ, and BDO India LLP shall not be liable to the Company or to any other party for any claims, liabilities

or expenses relating to this report. Any party other than APSEZ who obtains access to our report or a copy thereof and chooses to rely on our report (or any part thereof) will do so at its own risk. Accordingly, we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this report is shown or, into whose hands it may come without our prior consent in writing.

Our report is released to APSEZ on the basis that it shall not be copied, referred to or disclosed, in whole (save for inclusion in APSEZ's Tax Transparency Report) or in part, without our prior written consent.

For BDO India LLP

Place: Ahmedabad

Date: November 23, 2024

Disclaimer

This voluntary report has been prepared by APSEZ considering best practices and to the best of our knowledge. This report is for information purposes only.

This report might contain statements that are forward-looking in nature. All statements other than statements of historical fact could be deemed as forward-looking in nature. Such statements are inherently subject to risks and uncertainties, some of which cannot be predicted or quantified. By accessing or relying on this report,

you acknowledge that you will be solely responsible for your own assessment of the market and our market position, and that you will conduct your own analysis and be solely responsible for forming your own view of the potential future performance of our business.

No duty to update:

APSEZ assumes no obligation to update any information or forward-looking statement contained herein, save for any information we are required to disclose by law.

Our reporting ecosystem:

We pay special attention to transparency and making content easy to find. This report is part of a broader reporting ecosystem which covers other topics relevant to Adani Portfolio companies. The publications include, among others, the Integrated Report 2023-24.

All content published is copyright of APSEZ and shall not be reproduced without the prior written permission of the Company.



Annexures

Annexure 1

List of Global Tax & Other Contributions Covered

Direct contribution	Indirect contribution	Other contributions
<ul style="list-style-type: none"> Corporate income tax (including surcharge & cess) Goods & Services Tax (borne) Custom Duty (borne) Government royalty Electricity duty (borne) Licence and other fees payment Environmental clearance fees Land revenue charges BOCW Cess Municipal Tax Permission fees Property Tax Stamp duty VAT / Excise (borne) RTO Charges 	<ul style="list-style-type: none"> Withholding tax collected on salaries Withholding tax collected on vendor payments Tax collected at source on sale from customers Goods & Services Tax (collected & paid) Professional tax Equalisation levy Waterfront Royalty (collected & paid) 	<ul style="list-style-type: none"> Employer's and Employee's contribution to provident fund Employer's and Employee's contribution to Employee State Insurance Employer's and Employee's contribution to Labour Welfare Fund

Annexure 2

List of Entities Covered

A. Indian entities

Sr.	Name of the entity	Sr.	Name of the entity
1	Adani Ports and Special Economic Zone Limited	49	Adani Warehousing Limited (Adani Agri Logistics (Borivali) Limited)
2	Adani Agri Logistics (Barnala) Limited	50	Adani Warehousing Services Limited
3	Adani Agri Logistics (Chandari) Limited	51	Adinath Polyfills Private Limited
4	Adani Agri Logistics (Dahod) Limited	52	Adrita Realtors Private Limited
5	Adani Agri Logistics (Darbhanga) Limited	53	Adani Petronet (Dahej) Port Limited
6	Adani Agri Logistics (Dewas) Limited	54	Adani Ports Technologies Private Limited (Mundra International Gateway Terminal Private Limited)
7	Adani Agri Logistics (Dhamora) Limited	55	Agratas Projects Private Limited
8	Adani Agri Logistics (Gonda) Limited	56	Aqua Desilting Private Limited
9	Adani Agri Logistics (Harda) Limited	57	AYN Logistics Infra Private Limited
10	Adani Agri Logistics (Hoshangabad) Limited	58	Blue Star Realtors Limited
11	Adani Agri Logistics (Kannauj) Limited	59	BU Agri Logistics Limited
12	Adani Agri Logistics (Katihar) Limited	60	Dependencia Infrastructure Private Limited

Sr.	Name of the entity	Sr.	Name of the entity
13	Adani Agri Logistics (Kotkapura) Limited	61	Dermot Infracon Limited
14	Adani Agri Logistics (Mansa) Limited	62	Dhamra Infrastructure Private Limited (Formerly Known Welspun Orissa Steel Private Limited)
15	Adani Agri Logistics (Moga) Limited	63	Dholera Infrastructure Private Limited
16	Adani Agri Logistics (MP) Limited	64	Dholera Port & SEZ Limited
17	Adani Agri Logistics (Nakodar) Limited	65	Dighi Port Limited
18	Adani Agri Logistics (Panipat) Limited	66	Gangavaram Port Services (India) Limited
19	Adani Agri Logistics (Raman) Limited	67	Griptronics Enterprises Private Limited
20	Adani Agri Logistics (Samastipur) Limited	68	Hazira Infrastructure Limited
21	Adani Agri Logistics (Sandila) Limited	69	HDC Bulk Terminal Limited
22	Adani Agri Logistics (Satna) Limited	70	HM Agri Logistics Limited
23	Adani Agri Logistics (Ujjain) Limited	71	Karaikal Port Private Limited
24	Adani Agri Logistics Katihar Two Limited	72	Karnavati Aviation Private Limited
25	Adani Agri Logistics Limited	73	Madurai Infrastructure Limited
26	Adani Aviation Fuels Limited	74	Mandhata Build Estate Private Limited
27	Adani Bulk Terminals (Mundra) Limited (Formerly Known As Adani Agri Logistics (Bathinda) Limited)	75	Marine Infrastructure Developer Private Limited
28	Adani Container Manufacturing Limited (Formerly known as Adani Cargo Logistics Private Limited)	76	Mundra Crude Oil Terminal Private Limited (formerly known as 'Adani Bhavanapadu Port Private Limited')
29	Adani Container Terminal Limited (Adani Pipelines Private Limited)	77	Mundra International Airport Limited
30	Adani Ennore Container Terminal Private Limited	78	Mundra LPG Terminal Private Limited
31	Adani Forwarding Agent Limited	79	Mundra SEZ Textile And Apparel Park Private Limited
32	Adani Gangavaram Port Limited	80	Mundra Solar Technopark Private Limited
33	Adani Harbour Services Limited	81	Nabhganga Enterprises Private Limited
34	Adani Hazira Port Limited	82	NRC Limited
35	Adani Hospitals Mundra Limited	83	Ocean Sparkle Limited
36	Adani Kandla Bulk Terminal Private Limited	84	Poseidon Leasing IFSC Limited
37	Adani Kattupalli Port Limited	85	PU Agri Logistics Limited
38	Adani Krishnapatnam Port Limited	86	Saptati Build Estate Limited
39	Adani Logistics Infrastructure Limited	87	Savi Jana Sea Foods Private Limited
40	Adani Logistics Limited	88	Sea Sparkle Harbour Services Limited
41	Adani Logistics Services Limited	89	Seabird Distriparks (Krishnapatnam) Limited
42	Adani Murmugao Port Terminal Private Limited	90	Shankheshwar Buildwell Limited
43	Adani Noble Limited	91	Shanti Sagar International Dredging Limited
44	Adani Petronet (Dahej) Port Limited	92	Sparkle Port Services Limited
45	Adani Ports Technologies Private Limited (Mundra International Gateway Terminal Private Limited)	93	Sparkle Terminal and Towage Services Limited
46	Adani Tracks Management Services Limited	94	Sulochana Pedestal Limited
47	Adani Vizag Coal Terminal Private Limited	95	Tajpur Sagar Port Limited
48	Adani Vizhinjam Port Private Limited		

B. Overseas entities

Sr.	Name of the entity	Sr.	Name of the entity
1	Abbot Point Bulkcoal Pty Limited	9	East Africa Gateway Limited
2	Abbot Point Operations Pty Limited	10	Haifa Port Company Limited
3	Adani Bangladesh Ports Private Limited	11	Mediterranean International Ports A.D.G.D. Limited
4	Adani International Ports Holdings Pte Limited	12	Noble Port Pte. Limited
5	Adani Yangon International Terminal Company Limited	13	Pearl Port Pte. Limited
6	Anchor Port Holding Pte. Limited	14	Port Harbour Services International Pte. Limited
7	Coastal International Terminals Pte Limited	15	Sparkle Overseas Pte. Limited
8	Colombo West International Terminal (Private) Limited	16	The Adani Harbour International DMCC