

# Growth with Goodness



Helping you navigate through the report



The icon shows references within this report, where the information is further elaborated



GRI Standards references are indicated by the icon, across this report

About the Report

For the sixth consecutive year, we are glad to present to you a crisp and pointed narrative on our environmental, social and governance performance. Conventionally known as the Sustainability Report, we are now glad to present to you our ESG Report. This Report sums up our strategy, management approach and performance, an effective confluence of which drives our sustainability agenda.

Approach to ESG Report

To better serve our investors and other stakeholders and help them make informed decisions, Adani Power Limited has developed an environmental, social, governance report, that presents information on Environment (E), Social (S) and Governance (G) pillars in a modular, uniform and consistent manner. The Report is developed in line with GRI Standards

– ‘in accordance’ with Comprehensive reporting requirement. The Report also presents the key content elements as per the International Integrated Reporting Framework and it presents the ‘multi-capitals’ thought process of the Company. This Report depicts the contribution of the Company towards the United Nation’s Sustainable Development Goals through strategy and actions. Adani Power Limited, being a signatory to the Task Force on Climate-related Disclosures (TCFD), has also presented its governance and strategy around climate change and its preparedness in mitigating climate risks. The detailed methodology followed for developing the content of the Report, based on the principles of materiality and stakeholder inclusiveness, is depicted on Page 27. The Content Index presented on Page 104 also maps the content with the United Nations Global Compact (UNGC) principles.

|                             |   |
|-----------------------------|---|
| Reporting period            | 01 <sup>st</sup> April, 2019 – 31 <sup>st</sup> March, 2020 |
| Restatement                 | LDO consumed in 2018-19 is updated (pg. 50)                 |
| Date of most recent report  | 30 <sup>th</sup> November, 2019                             |
| Reporting cycle             | Annual  |
| GRI Standards in accordance | Comprehensive   |
| Location of headquarter     | Ahmedabad, Gujarat, India                                   |

Contents

01 About Us  
Pg 02

04 The Vision that drives us  
05 About Adani Group  
06 About Adani Power Limited

04 ESG Performance  
Pg 38

38 Environment Report  
59 Air Emissions Management  
62 Social Report  
88 Governance Report

02 Sustainability for Us  
Pg 16

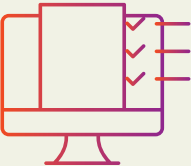
16 Sustainability Context  
20 From MD’s Desk  
24 CSO’s Statement  
26 Sustainability Governance

05 Annexures  
Pg 104

104 GRI Content Index  
104 Mapping with voluntary disclosure: CDP, DJSI, UNGC, TCFD, SEBI <IR>


03 ESG Priorities  
Pg 28

31 Materiality Analysis  
34 Integration of ESG priorities in core business strategy



You can view this report online on [www.adanipower.com](http://www.adanipower.com)

Performance Highlights

Environment

Specific Water Consumption

2.50 m³/MWh

2.34 m³/MWh

GHG Intensity

0.84 tCO<sub>2</sub>eq.

0.85 tCO<sub>2</sub>eq.

Biodiversity

No net loss to biodiversity by 2025

Signatory to IBBI

Waste Management

100% fly ash utilization

97% fly ash utilization

Target

Performance FY 2019-20

Social

Safe Workplaces\*

0 Lost time injury

0 fatality

\*for on roll employees

Training & Development

49.9 hr avg. training per employee

10.38% employees trained on human rights


CSR Project Impact

Impact assessment studies

Coverage and impact 3.4 million beneficiaries

Target

Performance FY 2019-20

Governance

Compliance Management

100% compliance/ zero non-compliance

No significant non-compliance

Anti-Corruption

Zero corruption

Zero corruption cases reported

Grievance Management

Zero grievance pending at the end of year

No grievance pending

Target

Performance FY 2019-20



# Growth with Goodness

Growth, for Adani Power, is the ability to improve the quality of life, propel businesses and inspire a shared future. Goodness is our overriding priority, across every decision we make, to support the safe and reliable supply of electricity – at a local, regional and national level – on which people and organisations critically depend. We strongly believe the way we work, the way we do business, even the way in which we lead our lives, can all change for the better. Achieving the right balance between growth and goodness while providing energy needed today as well as tomorrow has never felt so vital. It has, in effect, become the perfect rallying point for Adani Group as a whole during these extraordinary times.

## About Us

- 04 Our Vision and Values
- 05 About Adani Group
- 06 About Adani Power Limited
- 10 Our Value Creation Model
- 12 Awards and Recognitions in FY 2019-20
- 13 Memberships and Associations





# About Us

Adani Power Limited (APL), a part of the diversified Adani Group, is the largest private thermal power producer in India. We have a power generation capacity of 12,450 MW comprising thermal power plants in Gujarat, Maharashtra, Karnataka, Rajasthan, and Chhattisgarh and a 40 MW solar power project in Gujarat.

**'Growth with Goodness' is the defining philosophy of the Adani Group. For us, the two words 'growth' and 'goodness' complement each other. From building assets of national relevance to transforming lives through self-reliance and sustainability, balancing growth with goodness is central to our way of life.**



## Our Vision and Values

The ethos that define us are enshrined in our Vision statement. Our purpose is all about creating robust infrastructure and providing utility services that help build nations and impact lives positively through our responsible and sustainable businesses.



GRI 102-16

## Vision

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

## Values

### Courage

We shall embrace new ideas and businesses

### Trust

We shall believe in our employees and other stakeholders

### Commitment

We shall stand by our promises and adhere to high standards of business



GRI 102-2



GRI 102-3



GRI 102-4

GRI 102-5  
49-54(AR)

GRI 102-6



GRI 102-7

## About Adani Group

The USD 21 billion Adani Group is one of India's largest integrated infrastructure conglomerates with interests in:



**Resources**  
(coal mining and trading)



**Logistics**  
(ports, logistics, shipping and rail)



**Energy**  
(renewable and thermal power generation, transmission and distribution)



**Agro**  
(commodities, edible oil, food products, cold storage and grain silos)



**Real Estate**  
Public Transport Infrastructure, Consumer Finance, Solar Manufacturing and Defence



True to its values, the Group is embracing new opportunities and has a slew of new business ventures under Adani Enterprise Limited Incubator, which include airports, roads, water and data centres.

The Group owes its success and leadership position to its core philosophy of 'Nation

Building' and 'Growth with Goodness' – a guiding principle for sustainable growth. It is committed to protecting the environment and improving lives of communities through its CSR programmes and adhering to the principles of sustainability, diversity and shared values.

## Adani Group – Energy business and climate commitment

The Energy vertical of the Adani Group is committed to expanding the clean energy footprint and adopting the best of energy efficient systems. It comprises the following business operations:

- Thermal Power Generation – Adani Power Limited
- Renewable Energy Generation – Adani Green Energy Limited
- Transmission & Distribution – Adani Transmission Limited

Energy business portfolio within the Adani Group is becoming future-ready, with ambition to become the largest renewable power company by 2030. The existing portfolio of renewable power generating assets in Energy business stands today at over 14 GW. This is expected to grow further touching 25 GW by 2025.

Adani Power Limited contributes 12,410 MW of thermal and 40 MW of renewable power generation capacity in the Adani Energy business portfolio.

Total generation capacity = 38 GW by 2025 of which, more than 40% will be from renewables

Emission factor in 2025 (Thermal + RE) 0.54 tCO<sub>2</sub>/MWh; 36% lower than base year 2015)

## Energy mix 2025 for Adani Energy business vertical





About Adani Power Limited

GRI 102-1

GRI 102-2

GRI 102-3

GRI 102-4

We, at Adani Power, are well positioned to deliver sustainable and profitable growth, backed by our robust business model and best-in-class O&M. Our ability to identify and capitalise on value-accretive opportunities while minimising associated risks has created an unmatched value proposition in the thermal power space. We are leveraging the best available technologies to further improve efficiencies and reduce our environmental footprint.



Value-led Growth

As India revives its economic growth engine to take confident strides towards the next phase of its prosperity, we will continue to be a dedicated partner in that journey.

With an expanding portfolio of modern power plants, coupled with our unmatched fuel management, logistics, and technical capabilities, we remain fully committed to delivering sustainable value to all our stakeholders.

Adani Power Limited (APL), a part of the diversified Adani Group, is the largest private thermal power producer in India. We have a total power generation capacity of 12,450 MW comprising thermal power plants in Gujarat, Maharashtra, Karnataka, Rajasthan and Chhattisgarh and a 40 MW solar power project in Gujarat. Our corporate office is located in Ahmedabad, Gujarat.

Our business model promotes the UN Sustainable Development Goals and is in line with the Group's overall vision of nation building and creating sustainable value for all its stakeholders. The resilience of our business model has made it possible for us to sustain the challenges that the power sector in India has been facing.

Our thermal power plants are equipped with industry leading supercritical or ultra-supercritical technologies, which make it possible for us to meet the energy needs of the nation while combating climate change. Today, APL is the largest private-sector independent power producer, contributing to 16% of India's coal and lignite-based power generation capacity in private sector.

APL is a public limited company. Details of the Company's registration, key subsidiaries and shareholding patterns are provided in pages 49-54 of the Directors' Report as part of the Annual Report 2019-20. The company's total capitalization with debt and equity is given on page 158 of the Annual Report.

Our operations help address the following SDGs



A snapshot of our business in FY 2019-20

Existing operations  
**12,450**  
MW

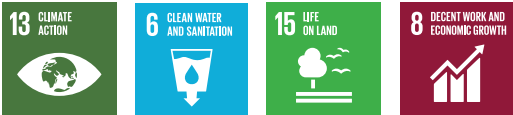
Operations under development  
**2,920**  
MW

Commercial Availability (PLF)  
**68%**

Our principal business activities



Operational efficiency



All the business activities contributing 10% or more of the total turnover of the Company shall be stated:

1. Existing Operations

APL has seven fully operational power plants which generate 12,450 MW capacity. The operations are strategically located based on the accessibility of raw materials. Almost 78% of the power generation capacity is based on supercritical and ultra-supercritical technologies. Further, 74% of the power purchase agreements are long-term tie-ups with the distribution companies.

| Location              | Raw material source  | Technology used  | Generation capacity |
|-----------------------|----------------------|--|---------------------|
| Mundra, Gujarat       | Coal Hard, Sea Water | (4*330 MW) - Subcritical<br>(5*660 MW) - Supercritical | 4,620               |
| Tiroda, Maharashtra   | Coal Hard            | 5*660 MW - Supercritical                               | 3,300               |
| Kawai, Rajasthan      | Coal Hard            | 2*660 MW - Supercritical                               | 1,320               |
| Udupi, Karnataka      | Coal Hard, Sea Water | 2*600 MW - Subcritical                                 | 1,200               |
| Raipur, Chhattisgarh  | Coal Hard            | 2*685 MW - Supercritical                               | 1,370               |
| Raigarh, Chhattisgarh | Coal Hard            | 600 MW - Subcritical                                   | 600                 |
| Bitta, Gujarat        | Solar Energy         | Solar PV   | 40                  |



2. Operations under development

The Godda Project in Jharkhand, India is a 1,600 MW project which is under construction. Located at a 100 km distance from the Indo-Bangladesh border, the project is being developed to supply power to Bangladesh. The project is aimed at addressing the power deficit of Bangladesh. It is based on the ultra-supercritical technology, which is more efficient and less carbon intensive.

A power purchase agreement (PPA) has been signed between Adani Power (Jharkhand) Limited (APJL), a wholly-owned subsidiary of APL, and the Bangladesh Power Development Board on 05<sup>th</sup> November, 2017, for supplying 1,496 MW (net) of power to Bangladesh through a dedicated transmission line across the Indo-Bangladesh border for a period of 25 years.

Another 1,320 MW supercritical power project is under development in Chhindwara District, Madhya Pradesh.

Plant Load Factor (PLF) and Sales Trend by Plants in FY 2019-20 over FY 2018-19

Average Plant Load Factor (%)

|                    | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|--------------------|------------|------------|------------|------------|
| APL Consolidated   | 68         | 62         | 55         | 70         |
| Mundra (4,620 MW)  | 74         | 59         | 54         | 81         |
| Tiroda (3,300 MW)  | 80         | 75         | 61         | 61         |
| Kawai (1,320 MW)   | 69         | 66         | 44         | 72         |
| Udupi (1,200 MW)   | 31         | 50         | 59         | 75         |
| Raipur* (1,370 MW) | 52         | -          | -          | -          |
| Raigarh^ (600 MW)  | 33         | -          | -          | -          |

\* Effective PLF for Operational period (August'19 to March'20)  
^ Effective PLF for Operational period (December'19 to March'20)

Power Sales (Billion Units)

|                           | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|---------------------------|------------|------------|------------|------------|
| APL Consolidated          | 64.12      | 55.25      | 48.07      | 60.2       |
| Mundra (4,620 MW)         | 27.19      | 21.77      | 19.9       | 27.6       |
| Tiroda (3,300 MW)         | 22.02      | 21.14      | 17.3       | 17.3       |
| Kawai (1,320 MW)          | 7.55       | 7.39       | 5.0        | 7.9        |
| Udupi (1,200 MW)          | 3.03       | 4.87       | 5.8        | 7.4        |
| Raipur* (1,370 MW)        | 3.79       | -          | -          | -          |
| Raigarh^ (600 MW)         | 0.47       | -          | -          | -          |
| Bitta Solar Plant (40 MW) | 0.065      | 0.075      | 0.072      | 0.056      |

\* Effective PLF for Operational period (August'19 to March'20)  
^ Effective PLF for Operational period (December'19 to March'20)

3. Future operations on the anvil

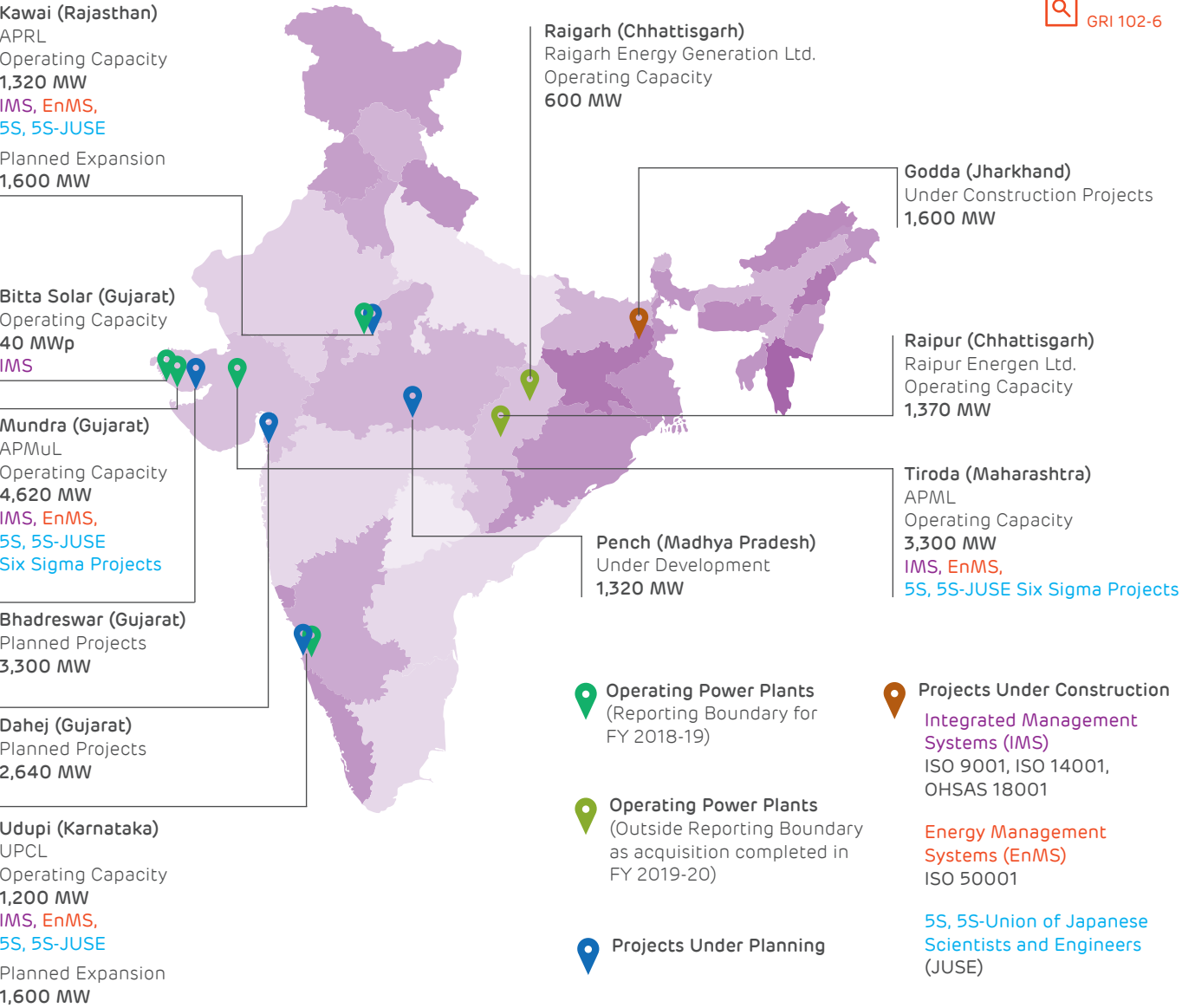
- Pench Thermal Energy (MP) Limited (Formerly known as Adani Pench Power Limited)**  
Planned project with 1320 MW generation capacity At Chhindwara Dist, Madhya Pradesh
- Kutch Power Generation Limited**  
Planned projects with 3,300 MW generation capacity At Bhadreswar, Gujarat
- Adani Power Dahej Limited**  
Planned projects of 2,640 MW generation capacity At Dahej, Gujarat
- Adani Power Resources Limited**

Economic Performance (₹ million)

| Particulars                    | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|--------------------------------|------------|------------|------------|------------|
| Economic Value Generated (A)   | 278,418    | 263,616    | 210,934    | 232,028    |
| Revenue from Operations        | 264,677    | 238,842    | 206,110    | 227,838    |
| Other Income                   | 13,741     | 24,774     | 4,824      | 4,190      |
| Economic Value Distributed (B) | 260,972    | 245,866    | 206,110    | 227,139    |
| Fuel Cost                      | 175,804    | 159,492    | 125,484    | 146,236    |
| Purchase of Stock-in-Trade     | 4,671      | 8,099      | 3,093      | 2,157      |
| Other Expenses*                | 23,081     | 18,078     | 17,084     | 15,712     |
| Employee Wages and Benefits    | 4,268      | 3,632      | 3,537      | 4,017      |
| Finance Costs                  | 53,148     | 56,565     | 55,702     | 59,017     |
| Economic Value Retained (A-B)  | 17,446     | 17,750     | 1,264      | 4,889      |

\* including Community Investment, Payments to Providers of Capital and Payments to Government

Markets Served:





## Our Value Creation Model

### Our Pool of Resources



#### Financial Capital

Equity from investors  
Long-term loans



#### Manufactured Capital

India's largest private thermal power producer with six operational thermal power stations and a solar plant, with 12,450 MW installed capacity.



#### Human Capital

2,792 Employees across 8 locations are at the heart of APL's business. Their collective strengths and skills make our journey towards achieving our vision possible.



#### Natural Capital

Diversified fuel mix including imported coal and domestic coal. Full tie-up of domestic coal requirements through long-term Fuel Supply Agreements (FSAs) with Coal India subsidiaries.

Use of sea water at our coastal plants and efficient use of freshwater withdrawn from various sources.



#### Intellectual Capital

A culture of innovation that focuses on operational efficiency and enhanced productivity. Capitalising the digital technologies and transitioning to smarter technologies.



#### Social and Relationship Capital

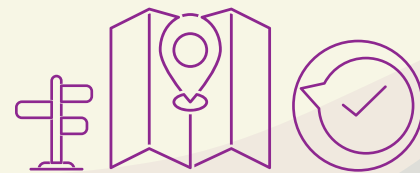
Preference for long-term PPAs to tie-up merchant capacity have held us in good stead; 74% of gross capacity tied to long-term PPAs; average life of PPAs ~18 years; PLF of 68%; availability of 89% for long-term PPAs.

Robust supply chain management, digital systems for supplier engagement, payments, monitoring and evaluation. Co-existing with communities and engaging in areas of health, education, infrastructure and livelihoods.

### Business Operations



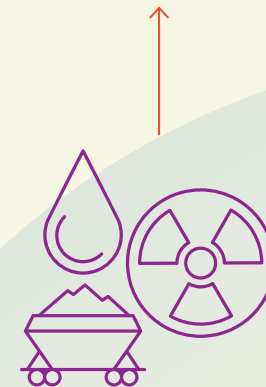
- Development
- Origination
- Market analysis
- Strategic value identification
- Investment case development



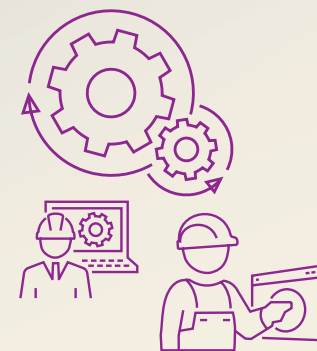
- Site development
- Land acquisition
- Permits and clearances



- Construction
- Engineering and design
- Sourcing and contracting
- Funding



- Fuel management
- Fuel sourcing
- Logistics coordination



- Operations
- Operations and maintenance
- Lifecycle O&M planning
- Technology usage
- Training and development

### Value Creation for our Stakeholders



#### Investors

We create long-term value by adding capacity and improving efficiency through prudent capital allocation.



#### Customers

Our customers are primarily state-owned power distribution companies (DISCOMs). We continuously engage with our existing and new customers under established commercial and regulatory channels.



#### Employee or Contractual Workforce

We strive towards creating a healthy and safe work environment for our employees as well as our contractual workforce.



#### Government/Regulators

We operate in a highly regulated business and need to continuously engage with the central and state governments, as well as central and state electricity regulatory commission to ensure that our businesses are compliant with the existing regulations and standards.



#### Local Communities

Starting from the project planning stage to the operational stage, we engage with the local communities that are affected by our business. Our CSR programmes address local needs, enabling us to maintain harmonious relationship with our communities.



#### Vendors and Suppliers

We engage with them continuously from the onboarding process, conduct site visits and collaborate with them for knowledge exchange based on the results of monitoring and evaluation.

### APL's Approach to Enhancing Outcomes

We continually seek ways to engage and maintain relationships of mutual trust with our stakeholders. Our quarterly and annual communication indicating our efforts of maximising financial value creation can be found on

Optimising our manufactured assets remains a key strategic priority.

A review of our operational performance is provided in the following sections of our ESG Report and Annual Report.

Ensuring that we safeguard the health and wellbeing of our people is a top priority. Detailed review of our people practices can be found on

Minimising our environmental impacts and seeking ways to be an active player in the global transition towards a low-carbon economy. More details on our environmental performance can be found on

Ensuring competitive advantage through innovation and digitalization remains the mainstay of our future growth strategy. More details on our progress on this front can be found at



## Awards & Accolades

We have been recognized and felicitated for our exemplary performance in several fields. These distinguished awards are truly a testimony to our culture of innovation and a track record of our excellence.



Sword of Honour awarded to Adani Power Rajasthan Limited (APRL) by British Safety Council



Udupi Power Corporation Limited (UPCL) won Platinum Prize at FICCI Safety Systems Excellence Awards



5-star certificate from Maharashtra Pollution Control Board to Adani Power Maharashtra Limited (APML) for stack emissions for 3rd consecutive year



Excellence Award during 5S Conclave at Varanasi to two teams from APRL



APML, APRL, UPCL certified with ISO 45001:2018 (OHS), ISO 50001:2018 (Environment Management System)



APMuL, APML, APRL and PCL certified for 5S (Workplace Management System)



Adani Power (Mundra) Limited (APMuL) certified for ISO 45000:2018 (OHSAS) and ISO :50001:2018 (EMS) in December 2019



APML won the IMC Ramakrishna Bajaj National Quality Awards Trust Performance Excellence Trophy 2019

## Memberships and Associations

As we remain committed towards our vision, we maintain active memberships in industry trade associations. We leverage this engagement with Associations to advance further initiatives aimed at making the industry even more sustainable.



GRI 102-13

### External initiatives

By engaging with trade and industry associations, we advocate matters impacting energy security, including but not limited to power sale, coal availability and logistics, financial health of DISCOMs, transmission evacuation constraints, clearances, environmental aspects related to power plants, financing, taxation and fiscal benefits. Through these bodies, we have presented the causes we stand for and have made our submissions to various governmental authorities such as the Ministry of Power, Ministry of Environment, Forests and Climate Change, Central Electricity Authority and Coal India Limited.

### Industry Associations



Confederation of Indian Industry (CII)



Federation of Indian Chamber of Commerce and Industry (FICCI)



Association of Power Producers (APP)



Independent Power Producers Association of India (IPPAI)



Gujarat Chamber of Commerce and Industry (GCCCI)



Ahmedabad Management Association (AMA)



National Safety Council (NSC)



Quality Circle Forum of India (QCFI)



Gujarat Safety Council



India Business and Biodiversity Initiative (IBBI)



At Adani Power, sustainability is the natural extension of our motto 'Growth with Goodness'. It refers to the social, environmental and economic responsibility of our operations, and is embedded into our strategy and innovation work at every step.

# Sustainability for Us

16 Sustainability for Us

20 From MD's Desk

24 CSO's Statement

26 Governance of ESG

28 Our ESG Priorities

31 Materiality Matrix

32 Our Stakeholder Priorities

34 Integrating our ESG  
Priorities







## External factors shaping our sustainability strategy



GRI 102-11



GRI 102-15



GRI 203-2

Several industrial sectors as well as the regional and global economies are undergoing a transformation that is bringing about structural changes. It is making us rethink the ways that available resources are used and helping us look at newer opportunities. At APL, progress and resilience are testimony to the soundness and sustainability of our business model that creates long-term value for all our stakeholders.

With a keen focus on the sustainability trends and based on the impacts that our activities have on our stakeholders and the risks and opportunities presented by these trends,

we formulate our strategy. Our approach to mitigating these impacts is based on the Precautionary Principle.

Our long-term strategy and day-to-day action plans are drawn in response to the opportunities and challenges that the external context presents to us. We are re-evaluating our inner strengths and realigning our processes to strengthen our positioning in a rapidly changing external environment.

### 1. Thermal power significantly contributes to India's growth

The Indian power sector has made significant inroads over the last decade, growing its installed capacity from about 200 GW in FY 2011-12 to about 370 GW in FY 2019-20. In terms of fuel mix, ~62% of total installed capacity and ~76% of total generation is thermal, indicating India's dependence on conventional fuel sources (Source: CEA). Coal-fired (including lignite) thermal power plants accounted for ~55% of installed capacity.

India's, peak power deficit decreased from 10.6% in FY 2011-12 to 0.7% in FY 2019-20. However, India's per capita electricity consumption still remains well below one-third of the global average at 1,181 kWh in FY 2018-19 (Source: CEA).

Commitment to our nation's growth and especially to its infrastructural requirements is embedded in our vision. We believe, despite the unpredictable business outcomes in the short-to-long term presented by the COVID-19 pandemic, India will be one of the growing consumption centres and business hubs in the decades to come.

Sustainability of our business in the challenging global economic scenario is assured with our focus on India's growth story, as our businesses are closely aligned to the lifeline of the economy - power, providing essential services and addressing critical national infrastructure priorities.

### 2. Commitment to mitigating climate change and adapting to its impacts is indispensable

India made a commitment at the 2015 United Nations Climate Change Conference in Paris that it would lead the climate change revolution; today, it is among the eight nations on track to meet their COP21 commitments. Ensuring that the country's power deficit is met without compromising on the requirements to mitigate climate risks, APL is taking all the possible measures to minimise

its carbon footprint through increased operational efficiency, maintaining fuel quality, reducing specific emissions and adopting best technologies.

Moreover, Adani Group's commitment towards combating climate change is further attested by the opportunity it identifies in the green energy space. The Group targets achieving an installed generation capacity of 25 GW of renewable power by 2025. We are also exploring all the possibilities of climate adaptation. Strengthening our resilience to climate-related issues cannot be considered independent of economic development priorities; job creation as well as decarbonization must be simultaneous objectives for our business.

### 3. Pollution standards are rapidly evolving to be more stringent

With increased environmental awareness, governments worldwide are increasingly coming up with stringent standards for managing environmental performance. Hence, innovative technology adaptation and timely measures are need of the hour for companies to stay ahead of these compliance requirements.

In December 2015, the Ministry of Environment, Forest and Climate Change (MoEFCC) issued the Environment (Protection) Amendment Rules, 2015, setting specific limits on water and stack emissions from thermal power plants for SO<sub>x</sub>, NO<sub>x</sub>, Particulate Matter (PM) and mercury. Accordingly, the Central Electricity Authority (CEA) mandated all operating power plants to install suitable devices to achieve the new emission standards. These requirements entail technology upgradation like flue-gas desulphurization (FGD) installation.

We, at APL, are prepared to completely abide by these regulations. Our continuous online emission monitoring system is functional at all our sites and the data is continually shared with the Central Pollution Control Board.







#### 4. Water stress presents significant impediment to smooth operations

Coal-based thermal power generation is a resource intensive process and also requires water in large quantities for cooling and other processes. Water being a shared resource, we are demonstrating responsibility towards managing water efficiently not only in the plant premises but also in managing this shared resource with our communities.

Moreover, our coastal operation at Mundra and Udipi use sea water, thereby minimising usage of surface water resources. For hinterland, operations as well as operations located near pitheads we are aware of the water stress that might be prevalent in the respective areas; hence, optimising water usage and responsibly sharing water resources and encouraging water conservation in the watersheds is our primary objective. At the same time, we recycle our effluents and use the treated water completely within the plant premises.

#### 5. Ensuring workers' health, safety and well-being becomes important while transitioning to a new industrial order

Providing equal opportunities of employment and ensuring fair and safe working conditions to all our

employees and contract labourers are the basic premises on which are human resources policies and practices are built. The coal-based thermal power operations are at an interesting juncture of transition. Whereas on one hand, we prepare our workforce to meet the demands of an increasingly changing technical requirements of the new digitized era and Industry 4.0, on the other, we need to ensure that the occupational health and safety and other requirements of the conventional operations are not compromised.

#### 6. Sustainable value-creation for communities is core to long-term sustainability

A harmonious partnership with the communities we serve is based on our efforts of creating shared value for the communities. We also ensure that our CSR programmes are aligned with community's needs. APL's approach to nation-building is reflected in all the CSR programmes that are designed to uplift community living standards and meeting needs of education, health, livelihood, community infrastructure and thereby truly empowering them.

#### 7. Investors and the larger stakeholder fraternity are looking for ESG integration

Our responsibility towards our stakeholders is not just in creating financial value but also how we are creating this value. We ensure that the environmental, social and governance considerations are mainstreamed in our business decisions. We use the ESG lens not only to monitor performance but also to proactively identify risks and address them accordingly.

Our efforts are concentrated on disclosing information on our future-readiness and preparedness for a world that demands transition in conventional ways of running business. Some of the world-renowned investor-driven initiatives that we are voluntarily part of are CDP and the Dow Jones Sustainability Index.

#### 8. Business continuity in the face of COVID-19 is a challenge

An unprecedented global pandemic like the COVID-19 has made us introspect and provided us with multiple opportunities for innovation. This pandemic crisis has further reinforced the criticality to have systematic risk mitigation plans in place. Both optimal capital structures and risk mitigation are a part of the maturing of the business philosophies as they grow in size and lay the foundation for stability as well as consistent value creation. While we may have to do need-based course correction in our strategies in the wake of the challenge that we are facing, the roadmap remains clear for business continuity and prosperity.

For further discussion on key impacts, risks, and opportunities, please refer strategic review section of annual report (page 16-24) and management messages.





## From MD's Desk



**Anil Sardana**  
Managing Director (w.e.f. 11<sup>th</sup> July, 2020)

Dear Stakeholders,

It gives me great pleasure to present to you our ESG Report for the FY 2019-20, the sixth such report published by us to date. The Report indicates how we have invested in India's energy infrastructure sustainably and responsibly. We are shaping the future of energy through innovation and investment in clean energy for the benefit of our customers.

The report includes examples of how we demonstrated our commitments and applied our management approach on a range of ESG topics, including environmental stewardship, health & safety, community relations, and governance. The combination of our governance practices, talented workforce, and sustainable business model is what has provided us with the

ability to create long-term sustainable value for our stakeholders.

We have supported the grid by catering to the baseload, to enable all resources and technologies, ensure access to reliable and secure power, reduce our environmental footprint, and support sustainable economic growth for the communities.

Amid these extraordinary times, we remained committed as ever to our long-term strategy. In response to the evolving practices and this year's pandemic, we acted with determination and took concrete actions to ensure that we continue to do our best work towards meeting India's energy demand. We delivered outstanding value to our customers, supported our communities, and empowered our teams, all this while

we generated significant shareholder value and did good for the environment.

At APL, the growth with goodness mantra is at the heart of our business decisions and it has propelled consistent value creation as well as robust performance against Environment, Social, and Governance parameters. We aspired to fulfill disclosure requirements of various standards and frameworks including GRI Standards, CDP, TCFD, DJSI, FTSE 4 Good, UNGC, IIRC, and UN SDGs. In doing so, we aimed at meeting the information requirement of all our stakeholders, including the providers of financial capital.

We always focused on building a business that is resilient and is able to deliver value for stakeholders by

having played our role as a sustainable energy company, with the best skills and capabilities across the industry.

### FY 2019-20 in brief

Our business model promotes the UN Sustainable Development Goals and is in line with the Group's overall vision of nation-building and creating sustainable value for all our stakeholders. Our thermal power plants are equipped with industry-leading supercritical or ultra-supercritical technologies, which makes it possible for us to meet the energy needs of the nation, while combating climate change. Today, APL is the largest private-sector independent power producer, contributing 5.36% of India's installed thermal power generation capacity. APL now operates 12,450 MW of generation capacity under its subsidiaries, that are Adani Power Mundra Limited (APMuL) at Mundra, Gujarat, Adani Power Maharashtra Limited (APML) at Tiroda, Maharashtra, Adani Power Rajasthan Limited (APRL) at Kawai, Rajasthan, Udupi Power Corporation Limited (UPCL), Udupi, Karnataka Adani Power Jharkhand Limited (APJL), Godda, Jharkhand. During the year, we completed the acquisition of two operational power plants – Raipur Energen Limited (REL) at Raipur, Chhattisgarh; and Raigarh Energy Generation Limited. (REGL) at Raigarh, Chhattisgarh with the idea of improving their efficiency too.

Power demand in India grew at a much slower pace of 1.2% during FY 2019-20, primarily due to a slowdown in economic growth. This was also owing to lower electricity demand in the agriculture sector on account of heavy monsoons across the country. In such a scenario, our well-diversified portfolio with 74% of generation capacity tied up with long-term PPAs provided strong revenue visibility. The power demand improved towards the closing of the financial year, underlining India's deep-rooted economic resilience and strong growth drivers. We are pleased to have contributed to this growth story.

During FY 2019-20, our average PLF was higher at 68% as compared to 64% in the previous year owing to higher customer demand, especially in the states of Maharashtra and Rajasthan. Implementation of the Supplementary Power Purchase Agreements in Gujarat strengthened our power sale position. We achieved a 16% growth in units sold in FY 2019-20 at 64.1 Billion Units (BUs), compared to 55.2 BUs in FY 2018-19. Incremental addition of power sales of REL and REGL helped achieve higher growth in FY 2019-20. Our total revenue for FY 2019-20 stood at ₹ 27,842 crore, which was

5.6% higher over revenues of ₹ 26,362 crore during FY 2018-19. Adjusting for the exceptional and one-time revenue recognition as well as additional provisioning, normalized EBITDA for FY 2019-20 was ₹ 6,104 crore, an increase of 32% over the normalized EBITDA of ₹ 4,611 crore in the previous year of FY 2018-19.

### Prepared for unprecedented changes

In many ways, FY 2019-20 was a year of unprecedented changes in terms of businesses waking up to the new world order and the risks, on which there is consensus at various levels including the Global Risks identified by the World Economic Forum. The developments in the macroeconomic environment caused by the pandemic situation, climate change, extreme weather, delicate interactions between the business and biodiversity, world outlook towards digital innovation, and data privacy, alongside changing geopolitical balances, have been among the principal forces motivating enterprises to innovate and immunise their business model.

Adani Power Limited has an Enterprise Risk Management (ERM) system in place to ensure business continuity and value creation in line with the vision of the Company. Considering the dynamic nature of the macro business environment, a systematic ERM ensured the identification of emerging risks and the development of associated management plans. Our risk management process aimed at supporting the delivery of the Group's strategy by managing all risks that can impact the assumptions for the business and value generation process. Ensuring the supply of power and availability of critical infrastructure during the COVID-19 crisis has been a testimony of our systematic ERM.

For climate change mitigation, we believe that responsible action and innovation are the only ways forward. The Nationally Determined Contribution (NDC) from our Government has been submitted to the United Nations Framework Convention on Climate Change (UNFCCC). As per this NDC, India intends to reduce the emissions intensity of its GDP by 33-35% by 2030, from its 2005 levels. Further, the Government has set a target of achieving 450 GW of renewable energy by 2030, as per the National Action Plan on Climate Change.

At the Group level, we see Adani Power Limited as part of the Adani Energy Business vertical, where two other separate legal entities that are Adani Green Energy Limited and Adani Transmission Limited operate in the space of renewable energy generation

**Our total revenue for FY 2019-20 stood at ₹ 27,842 crore, which was 5.6% higher over revenues of ₹ 26,362 crore during FY 2018-19**

**SAKSHAM**  
Adani Skill Development Centre

**Udaan**  
get inspired

**fortune**  
**Suhooshan**  
A CSR initiative by Adani Wilmar Ltd.

**स्वच्छाग्रह**  
स्वच्छता का सन्तान

### Our CSR thrust areas



**Primary Education**



**Community Health**



**Sustainable Livelihoods**



**Community Infrastructure**



and T&D, respectively. The energy portfolio within Adani Energy Business vertical is being made more future-ready by having an optimal energy mix to ensure reliable power supply to the grid and customers. By generating thermal power, within the portfolio of Adani Power Limited, we have been contributing to the stability of the grid to leverage the future potential growth of renewables in the country. During FY 2019-20, our GHG emissions were recorded at 0.85 tCO<sub>2</sub>/MWh, keeping us well on course to achieve the internal target of 0.84 tCO<sub>2</sub>/MWh by 2025.

APL has been disclosing its GHG emissions in the public domain from FY 2014-15. APL has also disclosed its Climate Change mitigation and Water Security approach for the first time through CDP 2020. All the company's operating power plants have an energy efficiency target under the Perform Achieve Trade (PAT) mechanism of Bureau of Energy Efficiency (BEE) under the Ministry of Power, Government of India. Our better-than-PAT target performance has enabled two of our plants to generate energy saving certificates (EScerts) which are tradable instruments, as an incentive for higher energy efficiency performance.

#### Conserving the world's most precious resource

We recognise the importance of conserving water. Also, water being one of the most precious shared resources, we optimized water use not only within our plants, but also extended our water conservation practices beyond the boundaries of our operations. We use the India Water Tool developed by the World Business Council for Sustainable Development (WBCSD), which brought together datasets and risk indicators from the Government of India and other institutions, to help users understand their water risks and plan conservation and management interventions accordingly. We also used the GIS-based tool Aqueduct developed by the World Resources Institute (WRI) to help us in water risk assessment. Water Source Sustainability has been one of the fundamental decision-making criteria for us for the selection of the location for our thermal power plants. As selection of location and siting of our projects has been a major business decision in Adani Power Limited, ESG considerations are integrated for such decisions, which is demonstrated by us by conducting a prior study of competing usage of water downstream of our hinterland power plants before the finalization of the site. During operations, we planned our water conservation activities and watershed development activities backed by scientific information.

Our operating plant at Tiroda is one of the hinterland plants, where we source water from a river. We have identified a water risk at this location, that may happen once in 50 years, based on a scientific study. At Tiroda, we have been working towards better watershed management. Our continuous efforts towards de-silting and cleaning community water ponds have resulted in improved groundwater recharge. To continue our operations without eroding natural capital, water storage capacity was augmented to cater to 53 days of operations required for the Tiroda plant and 23 days for the Kawai plant. This was aimed at preventing possible loss of generation due to the paucity of water during the lean season. Besides, we have initiated rainwater harvesting at our all plants that have resulted in harvesting 9.88 million m<sup>3</sup> rainwater in FY 2019-20.

In India, for surface water consumption at thermal power plants, there is a regulatory limit of 3.5 m<sup>3</sup>/MWh. We have set a stricter internal target i.e. 2.5 m<sup>3</sup>/MWh of surface water consumption for our hinterland power plants. For seawater consumption, though there is no regulatory limit, we have set an internal target of 9.5 m<sup>3</sup>/MWh at plants with seawater-based Flue Gas Desulphurization (FGD) and 6 m<sup>3</sup>/MWh at plants without seawater-based FGD. During the year, we have performed well within our Internal target for seawater consumption as well.

Besides, our efforts for optimising the use of natural resources, waste, and bio-products utilization, especially the fly ash utilization, is our focus area. During the year, we have improved utilization of fly ash and performed better national average utilization of the current fly ash utilization. This continues to remain one of our key challenge to address, as we go further.

#### Innovation and new technology

We realise that innovation and the use of new technology are needed to be competitive and efficient in the thermal power section also. Sonic soot blowers were installed in boilers to reduce ash accumulation at gooseneck areas of furnaces. Plants also installed turbine fast cooling devices to reduce turbine downtimes. Thermography of coal stockpiles has been carried out to identify hot spots in coal stockpiles, to prevent coal fires at yards at all plants, and to eliminate energy loss. A comparative study between UAV Ninja/Drone and 3D Scanner has been carried at west port Mundra for volumetric measurement to establish the suitability of the technologies.

#### For the cause of biodiversity

We understand biodiversity is a delicate web-of-life. The sustainability of our business is intricately linked with the biodiversity and ecosystem in which we operate, including the forests, grasslands, and mangroves. Our biodiversity policy drove us to do business with no net loss to biodiversity. We have also become signatory to the India Business and Biodiversity Initiative (IBBI), which is a business-led initiative to serve as a national platform for business, to promote sharing and learning, and ultimately lead to mainstreaming sustainable management of biological diversity. IBBI was initiated by the Ministry of Environment, Forests and Climate Change (MoEFCC), Government of India, along with the CII-ITC Centre of Excellence for Sustainable Development. We have made concerted efforts to ensure no loss to biodiversity through our operations.

#### Above all, safety

The safety of our people is of prime importance to us. Aligned with our objective of ensuring workplace safety, all our operations are certified for safety management system as per 45001: 2018 standard. We have set forth on the safety and cultural transformation journey, titled 'Project Chetna', in consultation with DuPont, a pioneer organization in the field of safety management.

There has been continual improvement and positive developments in safety culture within the company. However, we are saddened to have one fatal accident during the year. We remain ourselves in our commitment and in working towards our overarching 'Zero harm' goal.

Adani Power Rajasthan Limited, Kawai was awarded the British Safety Council (BSC) 'Five Star' rating, the highest category of safety award. Our operations have been recognized with the 'Sword of Honour-2019' from BSC. The Udupi Power Corporation Limited (UPCL) Udupi was the recipient of the Platinum Prize, while APML, Tiroda won the certificate of appreciation under the 8th FICCI Safety Systems Excellence Awards within the Power category of the Manufacturing sector. Our focus on enhancing our customer value proposition helped reduce customer complaints and earned award-winning customer satisfaction.

#### People that fuel our success

Our diverse teams delivered superior business results. The average age of our employees is 37 years. This provided us a competitive advantage to cultivate leadership within the organization

and engage in succession planning to meet our growth plans. We have genuinely invested in ensuring that we extend a productive and secure work environment that enables people to deliver their best. We also participated in the employee engagement survey conducted by well-known agencies in the world in this space. During the year, we participated in the survey carried out by Gallop, wherein 93% of the employees responded and the results measured by a grand mean score of APL reflected a higher level of employee engagement. To further enhance the engagement, additional initiatives have been taken to provide an enabling environment for our employees.

#### Empowering the community

As a responsible corporate citizen, APL has adopted an inclusive growth model. We are actively involved in the upliftment of the marginalized communities through the Adani Foundation, a non-profit organization focused on the implementation of CSR activities of the Adani Group. Our CSR approach has been to enable the communities and create a deep impact, and leave positive footprints in the areas of education, community health, sustainable livelihood, and community infrastructure. We have identified programs and activities to create a positive impact in these areas.

Our association with Adani Foundation has enabled us to continue the CSR programs and activities on the ground year on year, even if there is any low in the business in any particular year in the company. Although we did not generate any net profit in the reporting year and our contribution to Adani Foundation was limited within the purview of applicable CSR Regulations in India, the CSR programs and activities have continued on the ground for all the APL locations. Adani Foundation has enabled the communities and created impact through its programs that include: 'Adani Vidya Mandirs' which is a unique high quality, merit-based education for underprivileged children, and 'Gyanodaya' which is an e-learning program to support Government schools for improving quality of education through technology and improving access, 'Saksham' which is a Skill Development for underprivileged women in technical skills, 'SuPoshan' a program to fight malnutrition and anaemia, 'Udaan' to inspire young minds to dream big, 'Sanghini' as community

change agents in rural hamlets, 'S+5S' a program to inculcate the culture and behaviour of safety and cleanliness from the tender age of children in schools.

#### Corporate Governance in focus

We have pursued a well-rounded governance structure designed duly keeping in mind the applicable regulatory requirements in the geographies of APL's operations and international best practices. Context analysis, priority identification for the business as well as our stakeholders, and sustainability planning under the oversight of our experienced Board have been key to our governance framework. The members of the Board of Directors of the company are renowned experts in their field and have vast experience in governance.

At APL, we have codes, policies, procedures for better governance and for upholding the interests of all the stakeholders. Besides the Code of Conduct (CoC) for the members of the Board, we have also established a CoC for all employees and suppliers. Our codes, policies, and procedures also include Board Diversity Policy; Business Responsibility Report Policies; Policy on Material Subsidiaries; CSR Policy; Related Party Transaction Policy; Material Events Policy; Whistle Blower Policy; and Environment, Health & Safety Policy, which are in the public domain and address the key governance areas including anti-corruption and bribery. Besides, we have designated the senior management positions for Enterprise Risk Management (ERM). We have followed the COSO Framework for our ERM, which has enabled the identification of risks and develops mitigation plans for strategic, tactical, and operational risks. Strategic and tactical risks are appraised to the Board of Directors quarterly.

Stakeholder engagement in APL is an alive and ongoing process and we understand this, as if it is a breathing process to the organization. Material ESG issues are identified based on stakeholder engagement and inputs coming from all stakeholders through different channels. Our regular engagement by different functions of APL with the stakeholders goes beyond transactional communication. We have been disclosing our management approach and performance to all our stakeholders through our ESG Report on annual basis and through other periodic public disclosures. To ensure

**Our CSR approach has been to enable the communities and create a deep impact, and leave positive footprints in the areas of education, community health, sustainable livelihood, and community infrastructure. We have identified programs and activities to create a positive impact in these areas.**

the integrity of our ESG disclosures, we have designated senior management positions for ESG and Sustainability and implemented integrated management systems for Quality, Environment, Health and Safety, and Energy, which is implemented at all our locations.

Our adherence to sound ESG practices has earned us the 30th position at the Dow Jones Sustainability Indices (DJSI) for ESG survey among 153 Electric Utility Companies in the world in 2019. The DJSI is a family of best-in-class benchmarks for investors who have recognized that sustainable business practices are critical to generating long-term shareholder value and wish to reflect their sustainability convictions. This also makes us more committed to growth with goodness.

As we continue to invest in building the nation's energy infrastructure, I would like to place on record my deep appreciation of our stakeholders who have stood by us. APL has always remained committed to strengthen this bond founded on transparency and shared growth. As we intend to make further investments over the coming years, we will continue to use emerging technology and innovative ways to deliver cleaner and more reliable energy to our customers.

To our people and fraternity of investors, I extend my sincere gratitude for always having demonstrated the utmost belief in the business, which enabled us to ensure continuity of our services and the security of the power system in our areas of operation.

Looking forward to a brighter year ahead of us.

Yours sincerely,

**Anil Sardana**  
Managing Director





# CSO's Statement

Solid fundamentals for a better way forward



**Santosh Kumar Singh**  
Chief Sustainability Officer

Dear Stakeholders,

I am proud to present our ESG Report for FY 2019-20. We continue to remain steadfast in our commitment to delivering on Environmental, Social and Governance goals. During the year, we voluntarily participated in the DJSI for ESG survey and ranked 30th among 153 electric utility companies in the world. Our reporting includes our subsidiaries, Adani Power Mundra Limited (APMuL), Adani Power Maharashtra Limited (APML), Adani Power Rajasthan Limited (APRL),

Udupi Power Corporation Limited (UPCL), Raipur Energen Limited (REL), Raigarh Energy Generation Limited (REGL), Adani Power Jharkhand Limited (APJL), Adani Power Dahej Limited (APDL), Pench Thermal Energy (MP) Limited (formerly Adani Pench Power Limited) and Kutch Power Generation Limited (KPGL). These subsidiaries have their assets at Mundra in Gujarat, Tiroda in Maharashtra, Kawai in Rajasthan, Udupi in Karnataka, Godda in

102-18

102-19

102-20

102-26

102-32

102-29

Jharkhand, Dahej in Gujarat, Pench in Madhya Pradesh and Kutch in Gujarat, respectively.

At APL, we genuinely believe that responsible and transparent governance is vital to creating long-term sustainable value for our stakeholders and progressing on our strategic objectives consistently. Our high corporate governance standards are in accordance with the Securities and Exchange Board of India (SEBI) and the Companies Act, 2013, mandates, including establishing an independent Board to guide our operations and monitor and drive compliances. We comply with internationally renowned frameworks and standards in our nature of disclosures, such as the CDP, TCFD, UNGC and SDGs. We have in place a Sustainability and CSR Committee and an apex Committee for sustainability related decisions supervised by the Management. The MD, along with external members ensure the seamless and effective implementation of Sustainability and ESG directives from the Board.

It is important for us to not only demonstrate utmost sincerity and transparency in our disclosures, but also ensure that they are focused and answer key concerns around sustainable business operations, materiality and our engagement initiatives with the value chain. Material concerns in the form of security practices, impact on

biodiversity, indigenous rights, among others, hold great relevance to APL's business and we are deploying competence, innovation and resource optimization measures to tackle such issues. We believe in a shared path to progress and the year saw us step up our engagement levels to drive education, sustainable livelihood and infrastructure development in India. Once again, we are at the forefront of contributing to a more holistic development of the country.

Coal trading is key to our business and we have outlined the GHG emissions related to coal transportation via sea, road, rail and belt conveyer route. Such concerns are material for our coal-trading business. Going forward, we will report on further knowledge accessed on material concerns of coal trading in the business.

We have completed an independent assurance for this Report based on ISAE 3000 and AA1000AS assurance standards. Detailed discussion on our impact and endeavours across our stakeholder groups and the six capitals are covered in the Report. You may write to us on related concerns on [csa.power@adani.com](mailto:csa.power@adani.com). We look forward to hearing from you on what we can do better.

Yours sincerely,

**Santosh Kumar Singh**  
Chief Sustainability Officer

**We comply with internationally renowned frameworks and standards in our nature of disclosures, such as the CDP, TCFD, UNGC and SDGs.**



# How we govern ESG



GRI 102-19/  
102-20

Our governance structure follows the international best practices by integrating the Environmental, Social and Governance considerations in business decisions. It ensures that ESG performance monitoring and decision making permeates through different levels in the organization.

At the top governance level, the APL Board has a Sustainability and CSR Committee, and a Risk Management Committee which are sub-committees of the Board of Directors. The Board Committee oversees the implementation, monitoring, and reporting of climate-related issues, ESG performance and sustainability, along with the CSR policy and its implementation.

The ESG aspects and Risk Management are further incorporated within the organization by establishing an Enterprise Risk Management (ERM) System which is guided by the Chief Risk Officer. This system has been implemented across the Company to enable all the employees and business associates to raise any kind of risk identified by them up to the next level. The risk management framework has the provision to evaluate, prioritise and escalate the risk till the highest governing body within the organization.

The Committee identifies and incorporates ESG-related operational and financial risks through the resolution of the Board of Directors.

The organizational policies, purpose, values, mission statement, strategies, goals and targets related to sustainable development within the Company are developed by the senior management committees. These are based on the identified risks and opportunities related to the power sector, external environment, legal, management system requirements, and stakeholder consultation, among others. These policies are regularly reviewed and approved by the Board.

## Board Oversight

The Board examines and approves the Company's strategic, industrial and financial plans, including the annual budget. Its business plan incorporates the principle guidelines to promote a sustainable business model and lay down the basis for long-term value creation. The Sustainability and CSR Sub-Committees of the Board regularly monitor the sustainability and climate performance of the Company. We are looking to make our Governance structure world class.

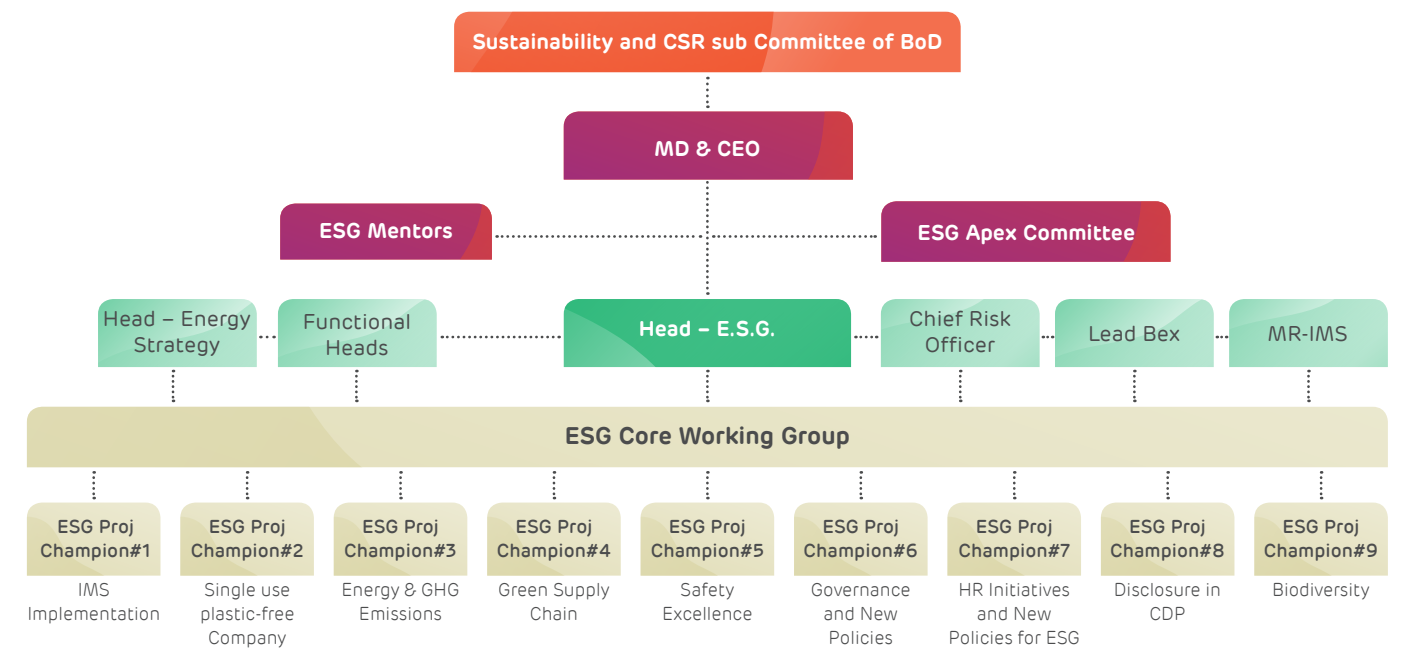
## Sustainability and CSR Sub-Committees

- The ESG Report is reviewed by the Apex Sustainability Committee – a group of functional heads and station heads – before submitting it for Assurance by an external agency
- The Sustainability and CSR Sub-Committees appraise the sustainability performance and the Report's contents before releasing it in the public domain and on the Company website

The core ESG working group and disclosures related to ESG are overseen by the CEO.

A Core ESG Working Group has been formed at all locations, which is supervised by the ESG Head under the guidance of the Chief Sustainability Officer (CSO). The Integrated Management Systems covering Quality, Environment, Health and Safety have been implemented at all the operating locations and their performance is being reviewed by the CSO.

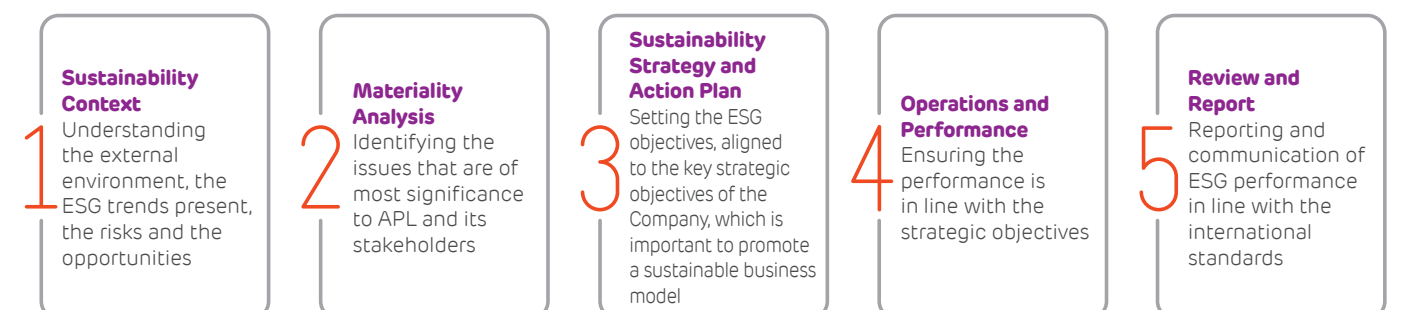
A snapshot of our organizational structure depicts how we govern and manage sustainability-related issues within the Company and report them.



## Roles and Responsibilities of the Committee

| ESG Apex Committee   | ESG Mentors  | Head ESG  | ESG Core Working Group  | ESG Champions   |
|--|--|---|---|---|
| <ul style="list-style-type: none"> <li>• Provide organizational vision and overall direction for ESG program</li> <li>• Review and approval on public disclosures on ESG (annual report, sustainability report, special disclosures)</li> <li>• Allocate resources required by ESG Core Working Group</li> </ul> | <ul style="list-style-type: none"> <li>• Provide specific guidance and operational insights for ESG Core Working Group and ESG Project Champions</li> <li>• Provide quarterly review of activities led by ESG Project Champions</li> </ul> | <ul style="list-style-type: none"> <li>• Coordination of ESG Apex Committee meeting on annual basis or as and when required</li> <li>• Coordination of ESG Core Working Group meeting on quarterly basis</li> <li>• Develop ESG disclosures and Sustainability Reporting with inputs from Functional Head, CRO, MR-IMS, Head-Bex</li> <li>• Facilitate ESG Project Champions for independent validation, audit and assurance of ESG initiatives for public disclosures</li> </ul> | <ul style="list-style-type: none"> <li>• Identifying material issues and risks with management approach for disclosures in public domain</li> <li>• Provide all data inputs, information for ESG requirements and reports for public domain</li> <li>• Engagement with stakeholders including external rating agencies and auditors relevant to ESG</li> <li>• Formulate long-term and short-term plan in line with achieving ESG vision as directed by Apex Committee</li> </ul> | <ul style="list-style-type: none"> <li>• Lead the assigned ESG project with 4-5 member cross-functional team</li> <li>• Coordinate monthly team meetings for progress on respective ESG projects</li> <li>• Report progress on monthly basis to Head ESG and on quarterly basis to ESG members</li> </ul> |

## ESG rating and sustainability indices assessment process in APL



**Mr. Praveen Anant**  
Head – ESG

Our performance on (E)nvironment, (S)ocial and (G)overnance aspects present the right picture of the strength of our value-creation model. Business decisions that truly integrate E, S and G are made based on – an effective governance structure, a dynamic strategy and a clarity of vision on long-term value creation. With the increasing emphasis by investors on adopting an ESG lens to evaluate a Company, during FY 2020-21, we, at Adani Power, have developed a clearly defined governance structure to address ESG topics of our Company. With this structure in place we as an organisation will be better placed, to identify and mitigate ESG risks and capitalise the associated opportunities.



# Our ESG Priorities

Our ESG priorities define our areas of action towards driving strategic initiatives on the path of our sustainability efforts. These priorities helps us list out how we effectively address the issues that matter the most to our shareholders.



GRI 102-15



GRI 102-40

GRI 102-42/  
102-43/  
102-44

GRI 102-47



GRI 103-1

## Materiality Analysis

Our periodic engagement with our stakeholders, robust feedback mechanism developed, understanding of sectoral developments and the experience and understanding of our internal stakeholders lead to identification of issues that matter the most for the Company's sustainability strategy.

For the purpose of Sustainability Reporting, internally we methodically carry out the materiality assessment process bi-annually. The methodology adopted is based on recognized international standards, including the Global Reporting Initiative (GRI), SASB (Sustainability Accounting Standards Board), standard AA1000APS and the SDG Compass, which helps in following and integrating the 17 UN-SDGs.

The issues are primarily classified into three broad buckets – Environmental Issues, Social Issues and Governance Issues.

## Inputs for identification of Material Topics

- Company's internal policies, news and reports in the public domain
- Business risks identified through the risk management framework and inputs from functional representatives based on ongoing engagement with stakeholders
- Material topics identified in peers' reports in the sector
- Emerging global megatrends and sector standards by GRI and other agencies

## Material Topics

| Topic  | Relevance  | Boundary |
|--|--|----------|
| <b>Environmental</b>   |  |          |
| • <b>Efficient use of land resources</b>   | As we develop new projects, we are aware of the impact of our activities on the land resources and biodiversity of the area. We aim to minimise our footprint and use the land resources efficiently.  | ⬆️ ⬇️    |
| • <b>Water Management</b>  | Availability of water is key to sustaining our operations and managing water resources efficiently to ensure efficient water usage; and water conservation is important to communities dependent on watersheds where we operate.   | ⬇️ ⬆️    |
| • <b>Waste Management (ash, gypsum, hazardous and non-hazardous waste)</b>                           | Managing and utilization of fly-ash is the biggest priority for our business. Managing other forms of hazardous and non-hazardous wastes, ensuring compliance and waste minimization is important for our unhindered operations and resource efficiency, respectively.   | ⬇️ ⬆️    |
| • <b>Emissions (Air and GHG) [Climate change mitigation and adaptation] Air Emissions Management</b> | GHG emissions and other air emissions such as SOx, NOx and particulate matter are the major forms of air pollutants associated with our operations. Minimising GHG emissions is essential for climate change mitigation and also for our long-term sustainability and business continuity. Managing other forms of air emissions is also important for minimising our ecological impact and resource efficiency. | ⬆️       |

| Topic  | Relevance   | Boundary |
|--|---|----------|
| • <b>Biodiversity, Land Availability and Indigenous Rights</b> | As part of project planning as well as operations management, we constantly strive to minimise our impacts on the floral and faunal biodiversity of the region. Conserving biodiversity and minimising its impacts is of prime importance not just for compliance, but for ensuring long-term co-existence within our surroundings. | ⬇️ ⬆️    |

| Topic   | Relevance  | Boundary |
|---|--|----------|
| <b>Social</b>   |  |          |
| • <b>Occupational Health and Safety</b>   | Workers' safety is the key to unhindered operations and productivity. Our employees are the invaluable assets that our business is immensely dependent upon.   | ⬆️       |
|   | Ensuring that our workforce is proudly and happily engaged with AAPL results in higher productivity and business continuity. Providing the best-in-class employment opportunities to our workforce, along with harmonious engagement between management and workers, is extremely important for the business operations. | ⬆️       |
| • <b>Human Rights – forced labour, child labour and working conditions</b>                          | We ensure that all our operations and our value-chain partners abide by the applicable regulations protecting human rights.  | ⬇️ ⬆️    |
| • <b>Grievance (environment, human rights, supply chain, contract labour, employees, community)</b> | Addressing the grievances of our workers and anyone associated with our operations or with our business partners is essential for sticking to our values, compliance with regulations and business continuity.   | ⬇️ ⬆️    |
| • <b>Indigenous Rights</b>  | As part of our focus on human rights, we believe cultural and heritage conservation and the rights of the indigenous communities directly or indirectly impacted by our business is important.   | ⬇️       |
| • <b>Security Practices</b>   |  | ⬇️ ⬆️    |
| • <b>Cultural Heritage</b>  |  | ⬇️       |
| • <b>Employment and Industrial Relations</b>  | We strive to be the best employer and create a happy, healthy and safe work environment for all our workers and employees.   | ⬆️       |

⬆️ Internal ⬇️ External



| Topic  | Relevance   | Boundary |
|--|---|----------|
| <ul style="list-style-type: none"> <li>Competent Manpower</li> </ul>                   | Focusing on learning and development of our own people is extremely important for making sure that we have a world-class talent pool as we grow and transition to more modern technologies. | ⬆️       |
| <ul style="list-style-type: none"> <li>Community Engagement and Development</li> </ul> | Harmonious co-existence with all our stakeholders, especially our communities, is essential for our uninterrupted operations.   | ⬇️ ⬆️    |

| Topic   | Relevance   | Boundary |
|---|---|----------|
| <b>Governance</b>   |   |          |
| <ul style="list-style-type: none"> <li>Compliance</li> </ul>  | Compliance with all the regulations applicable to our business operations cannot be compromised with for business continuity.   | ⬆️ ⬇️    |
| <ul style="list-style-type: none"> <li>Business Continuity</li> </ul>                                 | Business continuity is dependent on many operational and strategic risks, both short and long-term in nature. We need to be prepared for our long-term sustainability and resilience against any such adverse situations, including unforeseen global events such as the COVID-19 pandemic. | ⬇️ ⬆️    |
| <ul style="list-style-type: none"> <li>Anti-Corruption</li> </ul>                                     | Upholding the values of our organization and monitoring that no unlawful transactions are undertaken by any of our employees or business partners or collaborator of the business.  | ⬇️ ⬆️    |
| <b>Economic</b>   |   |          |
| <ul style="list-style-type: none"> <li>Economic Performance</li> </ul>                                | With nation building being our priority, we believe healthy financial growth of the Company will have positive implications on the economy in which we thrive. Hence, we believe in value creation and equitable distribution.  | ⬆️ ⬇️    |
| <ul style="list-style-type: none"> <li>Plant Efficiency</li> </ul>                                    | Optimising performance and achieving high efficiency levels is essential not only for productivity and cost efficiency, but also for minimising our climate risks and ecological impacts.   | ⬆️       |
| <ul style="list-style-type: none"> <li>Modernization, Innovation and Resource Optimization</li> </ul> | Innovation and modernization are the key to resource efficiency, plant productivity and climate change mitigation.  | ⬆️       |

⬆️ Internal    ⬇️ External

## Materiality Matrix

The Materiality Assessment published in the previous year's Report stands unchanged, and can be referred to from the FY 2018-19 Value Creation Report. The material topics grouped in the Environmental, Social Governance sections are as below:

| <br>Good Governance   | <br>Good for Environment   | <br>Good for Society  |
|---|--|---|
| <b>Corporate Governance</b> <ul style="list-style-type: none"> <li>Environmental compliance</li> <li>Socio-economic compliance</li> </ul> | <b>Climate Change and Emissions</b> <ul style="list-style-type: none"> <li>GHG</li> <li>SOx</li> <li>NOx</li> <li>Particulate Matter (PM)</li> </ul> | <b>Occupational Health and Safety</b>   |
| <b>Business Continuity Pandemic, COVID response</b>   | <b>Water</b>   | <b>Human Rights</b> <ul style="list-style-type: none"> <li>Forced labour</li> <li>Child labour</li> <li>Working conditions</li> </ul> <b>Security practices</b> |
| <b>Anti-Corruption, Anti-Bribery</b>  | <b>Waste</b> <ul style="list-style-type: none"> <li>Ash</li> <li>Gypsum</li> <li>Hazardous and Non-hazardous Waste</li> </ul>                        | <b>Employment Industrial Relations Competent Manpower</b>   |
| <b>Economic Performance</b>   | <b>Modernization, Innovation and Resource Optimization</b>   | <b>Community Engagement and Development</b>   |
|   | <b>Biodiversity</b>  | <b>Indigenous Rights</b>  |
|   |  | <b>Land Availability</b>  |
|   |  | <b>Cultural Heritage</b>  |



## Our Stakeholder Priorities



GRI 102-15

As part of our regular business, our stakeholder facing functions constantly transact and gather feedback from a wide range of stakeholder groups. Every stakeholder group may have specific needs that we are meeting through our business. Apart from these, there are other unmet or unknown requirements that we identify with and try to work on our responses accordingly.

Our significant stakeholders include trade associations, customers, the financial community, national and international research

institutions, civil society, local communities, media, employees, vendors and the contractors.

The issues identified through interactions with stakeholders are then made part of the planning process, setting targets and actions. These are aimed at continually improving our response to the stakeholders' expectations.

The table below summarises our engagement methods with our stakeholders, our key concerns, and our response and frequency of engaging with some of our key stakeholders during the reporting period.

| Key Stakeholder Groups                       | Key Concerns  | Engagement Platforms and Frequency of Engagement  | Our Response   |
|--|---|---|--|
| <b>Employees and contractual workers</b><br> | Work Environment, Health and Safety, Energy Efficiency, Talent Management   | Direct interaction, Feedback questionnaire, Newsletter, Magazines and e-mails, Employee engagement Events, Open forum, and Exit Interviews<br>●       | Initiatives to improve work environment, Safety management systems, Energy efficiency initiatives, Employee training and development   |
| <b>Vendors</b><br>                           | Timelines for payments, Knowledge sharing, ESG compliance requirements  | On-boarding process, Site visits to manufacturing facilities for compliance monitoring, Regular one-on-one interaction for compliance monitoring<br>● | Payment cycle changed from two days a week to daily, Implementation of IT-enabled vendor management systems, Vendor audits and meets   |
| <b>Local Communities</b><br>                 | Water availability, Local employment, School education, Community healthcare facilities, Vocational skill development | Direct interaction with project beneficiaries and community-based organizations, Interviews with local community representatives<br>● ●               | Infrastructure and sanitation-related projects, Local hiring wherever and whenever possible, Women empowerment programmes, Education programmes including adoption of Government schools, Computer literacy and Teacher orientation, Community health programmes, Mobile Health Care Units, Livelihood generation programmes |

● Ongoing ● Regular ● Need-based ● Quarterly basis ● Specific need based ● Issue-based

| Key Stakeholder Groups | Key Concerns   | Engagement Platforms and Frequency of Engagement   | Our Response   |
|------------------------|--|--|--|
| <b>Regulators</b><br>  | Compliance, Revenue and taxes, Community development   | Direct interaction on a case-to-case basis, Policy advocacy through industry bodies, Response to information sought, Routine filing of reports, Regulatory audits and inspections<br>● ● | Compliance monitoring and management, Payment of statutory levies, Submission of reports and other related information, CSR initiatives  |
| <b>Investors</b><br>   | Company's sustainability performance, Growth opportunities, Debt servicing   | Investor meets, AGMs, Meeting with bankers and other financial institutions, Periodic declaration of results<br>● ●  | Prudent financial management system and reporting  |
| <b>Shareholder</b><br> | Transfer/transmission of shares, non-receipt of annual report, non-receipt of declared dividends, issue of new/duplicate certificates, general meetings etc. | Investor meets, AGMs<br>● ●  | Ensuring timely receipt of dividend warrants/annual reports/statutory notices by the shareholders of the Company.<br><br>Reviewing of adherence to the service standards adopted in respect of various services being rendered by the Registrar & Share Transfer Agent |
| <b>Customers</b><br>   | Plant availability, Transmission availability, Forced outages, Reconciliation of accounts, Settlements including change in law                               | Direct communication with existing and new customers through various media, Binding agreements including PPAs, through power exchanges<br>● ●  | Power generation planning and scheduling, Timely and proactive communication on reconciliation and settlements, Responses to queries, Proactive settlements  |
| <b>Media</b><br>       | Local community development, Health and Safety, Legal compliances, Environment protection, Ash management  | Telephonic interviews, Personal interviews, Regulatory authorities<br>●  |  |

● Ongoing ● Regular ● Need-based ● Quarterly basis ● Specific need based ● Issue-based



# Integrating our ESG Priorities

An important aspect of considering ESG factors in the key decision-making of the Company is driven by our strategic objectives and priorities. With a defined strategy and an action plan, we are ensuring that the ESG considerations be mainstreamed in all key business decisions. At the same time, they should dynamically respond to the developments in the external environment.

## Key Strategic Objectives

### S01

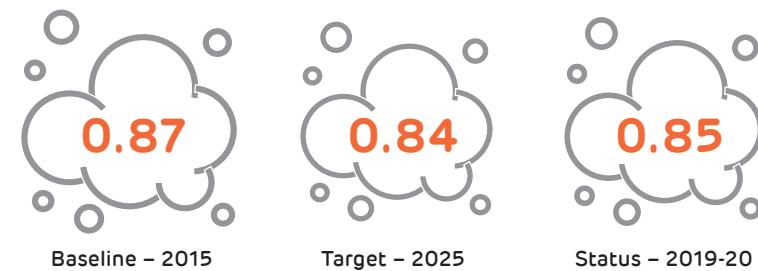


#### Minimising GHG Emissions

Minimising GHG emissions is a key strategic objective of our business. By virtue of being engaged in thermal coal production, our primary focus is on minimising GHG emissions by inculcating operational efficiency measures and deploying best-in-class technologies.

We are in the process of setting specific targets and analysing different climate scenarios and their impacts on our business. In 2015, the Company's GHG emission intensity was 0.87 tCO<sub>2</sub>e/MWh. The emission intensity in FY 2019-20 was 0.85 tCO<sub>2</sub>e/MWh. It targeted to achieve 0.84 tCO<sub>2</sub>e/MWh by 2025.

#### GHG emission intensity (tCO<sub>2</sub>e/MWh)



Key SDGs



### S02



#### Focusing on Climate Adaptability

An extremely important aspect of our future preparedness is our preparation for climate adaptability. Extreme weather conditions such as strong and frequent storms can adversely affect the supply of fuel and damage generation and grid infrastructure. To combat these aspects, we have focused on designing and building plant infrastructure to withstand extreme events, such as cyclones.

Key SDGs



### S03



#### Digitization of Operations

Despite being in the conventional thermal power generation business, improved productivity and resource efficiency are key to our long-term sustainability and business continuity. Digitization of our operations is one of our key business objectives through which we aim to continue achieving benchmark performance in terms of plant efficiency and productivity. Moreover, we are preparing ourselves to transition towards Industry 4.0 and adopting AI-based technologies.

Key SDGs



### S04



#### Achieving benchmark performance in Operational Efficiency

Resource efficiency and improved productivity have direct implications on our financial and environmental performance. We keep striving for improved operational efficiency. We have adopted different measures at different plant locations to outperform the operational benchmarks based on the technology deployed. Quality of raw material, equipment health, plant maintenance measures, and implementing innovative solutions for countering any wastage or leakage are some of the key areas of focus for improved efficiency.

Key SDGs



### S05



#### Being the Employer of Choice

We believe in creating a healthy and safe work environment for our people, while providing world-class working conditions to our employees and creating appropriate learning & development opportunities for them. Our supportive policies encourage diversity at the workplace and create equal opportunities for growth. We also provide the right platform for our workers to interact with the Management and uphold their rights.

Key SDGs





## S06



### Creating lasting Customer Relations and Sustainable Supply Chains

We believe in engaging in healthy relationships with our suppliers and customers and associating with them in a fair, transparent and collaborative manner to forge long-term partnerships. Our aim is to create value for them consistently and optimally by way of communication. We also strive to create solutions along with them and address their concerns, with a clear emphasis on security, savings, time, quality, performance and risk mitigation.

Key SDGs



## S07



### Upholding Good Governance

We generate and maintain the trust of all our stakeholders by ensuring transparency, disclosure and reporting that conforms fully with the existing laws and promotes ethical conduct of business throughout the organization. We voluntarily participate in several forums, sharing and disclosing information on different aspects of business sustainability with investor bodies and associations.

Key SDGs



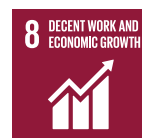
## S08



### Occupational, Health & Safety

Even as we ensure 100% implementation of ISO 45001 at our plants, we aim to achieve Zero fatalities and harm across the operations. With the implementation of Project Chetna, we are consistently progressing towards our objectives.

Key SDGs



## S09



### Minimising Environmental Footprint

Minimising our environmental footprint is directly related with our resource efficiency. Our key focus areas to minimise our environmental impacts are: waste management, reducing air emissions (SOx, NOx and others), optimising water usage and managing effluents and biodiversity.

Key SDGs



## Ensuring business continuity

In the wake of the unprecedented challenge presented by the outbreak of COVID-19 towards the end of 2020, our key focus has been to realign our strategies and build resilience to face these testing times. As our business is largely aligned with economic growth of our nation, our prime focus is to address critical national infrastructure priorities. A huge setback to the economy due to COVID has presented a significant challenge to the Company. However, we are utilising this period in reassessing our capital structures and ensuring effective risk mitigation to create stability and result in consistent value creation.



# Environment Report

41 Managing Environmental Priorities

42 Climate Change Mitigation and Adaptation

44 Resource Efficiency

45 TCFD

60 Biodiversity








## ESG Performance

The ESG Performance in FY 2019-20 and comparative four years, wherever data is available, is presented in Environment, Social and Governance Section further. All the Material Topics are grouped in these three sections .

Adani Power is in a unique position to drive society's transition to clean energy. In everything we do, we always look for ways to make more from less.



# Alignment with other voluntary disclosures

| GRI  | DJSI   | FTSE                        | CDP   |
|--|--|-----------------------------|---|
|  GRI 304: 2016<br>Biodiversity                        | • Biodiversity   | • Biodiversity              | C4: Targets and Performance<br>C5: Emissions Methodology<br>C6: Emissions Data<br>C7: Emissions breakdown |
|  GRI 302: 2016<br>Energy                              |  | • Energy                    | C8: Energy  |
|  GRI 301: 2016<br>Materials                           | • EMS certification  | • Resource use              |   |
|  GRI 303: 2018<br>Water and Effluents                 | • Environmental violations<br>• Public disclosure of EIA/SIA<br>• Operational Eco-efficiency   | • Water                     |   |
|  GRI 306: 2016<br>Waste                              |  | • Waste                     |   |
|  GRI 307: 2016<br>Environmental Compliance          |  |                             |   |
|  GRI 308: 2016<br>Supplier Environmental Assessment | • ESG integration in supply chain<br>• Risk exposure in supply chain   |                             | C12: Engagement   |
|  GRI 303: 2018<br>Occupational Health and Safety    | • Safety incidents (Fatalities and LTIFR)  | • Health and safety targets |   |
|  | • Operational Eco-efficiency<br>• GHG emissions<br>• Energy consumption<br>• Water consumption<br>• Waste<br>• NOx emissions<br>• SOx emissions<br>• Dust emissions<br>• SF6 emissions |                             |   |

Management Approach:  
**ISO 50001, 14001**  
IBBI Signatory, PAT



At APL, environmental responsibility is intricately linked with operational efficiency, performance and financial value creation. Our key material issues and our strategic actions designed to address these issues have been depicted below.

| Key Material Issues   | Strategic Objectives addressing the material issues   | Capitals Associated |
|---|---|---------------------|
| Resources Materials and Services                                  |          |                     |
| Water Management  |   |                     |
| Waste Management (ash, gypsum, hazardous and non-hazardous waste) |   |                     |
| Emissions (Air and GHG)   |   |                     |
| Biodiversity  |   |                     |

Note: The environmental performance indicators showcased in this section of the Report covers 100% of our operations. Any exceptions have been indicated separately.



# Climate Change Mitigation and Adaptation



GRI 103-2



GRI 305-2



GRI 305-7



GRI 303-1



GRI 103-3

Adani Power Limited has been at the forefront in addressing climate change concerns, while also contributing to the nation's growth by addressing country's power requirement and fulfilling the deficit. Some of the key initiatives we have adopted in reducing our emissions are summarized below:

- We are the first company in India to have commissioned supercritical boilers (December, 2011), which save about 2% of fuel per unit of power generated
- Mundra TPP has been registered<sup>1</sup> as a Clean Development Mechanism (CDM) project by UNFCCC and has been recognized for saving 1.8 million metric tonnes CO<sub>2</sub> equivalent per annum
- Till date, the Company has commissioned 9,290 MW (12 units of 660 MW each and 2 units of 685 MW) operational power plants, based on supercritical technology
- All of the Company's operating power plants are covered under the PAT mechanism and have an energy efficiency target
- We are considering the utilization of ultra-supercritical units for the upcoming TPPs to further reduce specific GHG emissions
- APL has reduced 16,526 Million tCO<sub>2</sub>e through its energy saving activities

The Company has responded to the CDP<sup>2</sup>, a publicly available global disclosure system for investors, companies, for the first time in order to manage their environmental impacts. It has also responded to Climate Change and Water Security Questionnaires 2020.

1 <https://cdm.unfccc.int/Projects/DB/DNV-CUK1245932980.89>

2 <https://www.cdp.net/en>

3 <https://www.fsb-tcf.org/tcfd-supporters/>

## Steps undertaken towards Climate Change Mitigation

### Energy efficiency above PAT targets

With the implementation of PAT scheme of BEE and its coverage to all of its operating plants, the Company has undertaken many energy-saving initiatives. The baseline assessment has been completed for Mundra power plant and is underway for the rest of the plants. Our better-than-PAT target performance has enabled two of our plants to generate EScerts, and also generate revenue as an incentive for higher energy efficiency performance.

For Mundra TPP, PAT-II Cycle M&V (Measurement and Verification) Audit has been completed in FY 2019-20 and secured 71,189 Energy Saving Certificates.

### Energy Management System (EnMS):

Under the Company's voluntary ISO 50001 targets, a dedicated energy management cell termed as OTS (Operations and Technical Services) drives energy efficiency measures. The proposals for energy efficiency are invited from the respective plant's teams and analysed for techno-commercial feasibility. Based on the sanctioned budget, projects with the best payback period are approved and assigned to a project implementation team. The progress is periodically reviewed by the OTS and necessary implementation support is extended.

## Employee Engagement

APL has implemented the "MAADHYAM" scheme, a communication channel available to all employees through which they can provide their ideas, suggestions, and insights across strategy, operations, technology, and organization directly to the Chairman.

All employees of the company are motivated by senior leaders to undertake ESG initiatives, which are fostered through various recognitions. At the shop floor level, there are various Kaizens and Quality Circle initiatives that achieve energy efficiency and savings. All the employees are encouraged to give suggestions as a part of Maadhyam scheme and recognized by the senior management.

## Infrastructure and Technology

We have implemented all appropriate measures to minimise climate change related risks to our assets and operations, while adapting to climate change. Most of our thermal power plants are equipped with either induced draft or natural draft cooling towers with a re-circulation system which can function effectively if the water temperature rises. Besides, our plants have inbuilt design and construction safety standards to withstand any kind of adverse impact under different scenarios of climate change.

We have designed and built all power plants and infrastructure to withstand cyclones of up to 198 kmph. With respect to the rising sea levels and cyclonic surges due to global warming, the finished floor level of the Mundra power plant has been raised to 10 m above the Chart Datum (CD), the lowest astronomical tides and mean low water. On the other hand, the highest high tide recorded is 5.4 m above the CD.

FGD is proposed for all sites (Except Mundra Phase#4: U#7,8,9- Sea water based FGD installed already) with wet lime stone based FGD under new MoEFCC Norms guidelines.



## Being committed to climate change

The power generation sector is witnessing an increased push for innovation and technology upgradation against the backdrop of growing climate change concerns. At APL, we have constantly demonstrated our commitment towards climate change mitigation by implementing the best available technologies at our power plants, thereby ensuring efficient operations. We pioneered the commissioning of supercritical boilers at our Mundra plant in Gujarat, saving ~2% of fuel per unit of power generated and leading to lower GHG emissions. Till date, we have 9,290 MW (12 units of 660 MW and 2 units of 685 MW) operational power plants based on the supercritical technology. At our 1,600 MW Godda thermal power project in Jharkhand, which is currently under construction, we are now moving towards adopting the next generation Ultra Supercritical technology. Further, for future expansion, we remain committed to deploying the best available technologies to address India's energy requirements.

We have set an internal target to achieve 0.84 tCO<sub>2</sub>eq/MWh of GHG emissions by 2025, and we are constantly striving to achieving this.



**Mr. Jayadeb Nanda**  
Chief Operating Officer -  
Operations & Maintenance

For us, operational excellence is about driving a vigour for innovation across the organization, embracing new-horizon best-in-class technologies and implementing internationally recognized management standards. As a thermal power generation company, achieving optimal operational efficiency is at the core of our GHG emissions reduction and climate-change mitigation strategy. It also leads to resource efficiency and directly impacts our value-creation capability. The plethora of awards conferred for excellence in 5S (Workplace Management System), ISO 45000:2018 (OHSAS) and ISO 50001:2018 (EMS), as well as Quality are a testimony to our industry leading practices.



**K. S. Nagendra**  
COO - Projects

APL's plants are located across various geographical terrains, ranging from coastal areas to hinterland. It has extensive experience of working with a range of power plant technologies of subcritical and supercritical type. We have proven capabilities in undertaking the execution of large power projects based on modern technology, with adherence to time and cost limits. In addition, we have also demonstrated capability of turning around stressed power projects after acquisition.



GRI 302-2

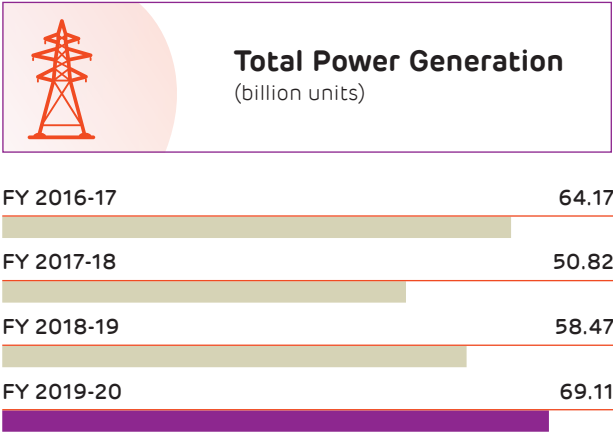
GRI 305-3

GRI 302-4

GRI 302-3

GRI 305-6

GRI 302-2,  
305-3



**Solar Power**  
**Total Solar Power Generation**  
**65**  
million units

**Total Energy Conservation**  
**72,552**  
GJ

**Emissions avoided**  
**16,526**  
tCO<sub>2</sub>

GHG Emissions

| Absolute GHG Emissions (Scope 1 + 2) million ton. CO <sub>2</sub> e | FY 2019-20         | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|---|--------------------|------------|------------|------------|
| Scope 1   | 58.97              | 49.51      | 42.03      | 53.89      |
| Scope 2   | 0.014 <sup>#</sup> | 0.00064    | 0.00061    | 0.66592    |
| Scope 1 + Scope 2   | 58.51              | 49.51      | 42.0       | 54.8       |

The GHG emissions from upstream coal transportation was recorded as 49.88 million tCO<sub>2</sub>eq (including sea, rail and road modes), with energy consumptions at 0.72 tCO<sub>2</sub>/MWh.

<sup>#</sup> Increase of Scope 2 emissions in FY 20 is because of consumption of grid electricity at newly acquired REGL plant

Energy intensity

| Energy Intensity (GJ/MWh) | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|---------------------------|------------|------------|------------|------------|
| APL                       | 9.01       | 9.13       | 9.14       | 9.09       |
| APMuL                     | 8.86       | 9.04       | 9.10       | 9.09       |
| APML                      | 9.09       | 9.22       | 9.20       | 9.23       |
| APRL                      | 9.13       | 9.26       | 9.15       | 8.78       |
| UPCL                      | 9.25       | 9.17       | 9.17       | 9.16       |
| REL                       | 9.22       | -          | -          | -          |
| REGL                      | 9.41       | -          | -          | -          |

Energy, emission and SF<sub>6</sub> emission and Ozone statement

| Specific GHG emissions | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|------------------------|------------|------------|------------|------------|
| tCO <sub>2</sub> /MWh  | 0.85       | 0.85       | 0.83       | 0.84       |

We constantly monitor our performance in terms of specific emissions and set internal targets for our operations and also a cumulative target for the Company. Target for GHG emission intensity is 0.84 tCO<sub>2</sub>/MWh in 2025.

We do not use any Ozone Depleting Substances (ODS) in our operations.

TCFD

We are in the process of strengthening our governance structure, strategy management, risk assessment and management, for climate-related risks. This TCFD report helps us further in improving our climate-related disclosures.

GRI 305-6

GRI 201-2

Governance

The Sustainability and CSR Committee, and the Risk Management Committee are sub-committees of the Board of Directors.

The Sustainability and CSR Committee oversees the implementation, monitoring, and reporting of climate-related issues, ESG and sustainability performance, along with CSR policies and its implementation.

The ESG risks, of which climate change related risks are a significant part, are identified and continually monitored by the Enterprise Risk Management (ERM) System and guided by the Chief Risk Officer. This system is implemented across the Company to enable all the employees and business associates to raise any kind of risk identified by them till the next level. The risk management framework in place has the provision to evaluate, prioritise and escalate the risk to the highest governing body in the organization.

The Committee identifies and incorporates climate-related operational and financial risks through the resolution of the Board of Directors.

The organizational policies, purpose, values, mission statement, strategies, goals, and targets related to sustainable development are developed by the senior management committees. This is based on identified risks and opportunities related to the power sector, external environment, legal, management system requirements, and stakeholder consultation, among others. These policies are regularly reviewed and approved by the Board.

The governance structure, starting from the Board of Directors till the corporate level committees, is developed with the objective of making ESG systematic and intertwining the subject in business decisions. The ESG and climate Change agenda is steered as follows:

a) There is an Apex Sustainability Committee (ASC), a body of all functional leaders and site heads at operating locations. ASC is chaired by the CEO and guided by the CSO to develop the management systems for ESG and Climate Change.

b) At the working level and one level below the ASC, there is a Core ESG Working Group, which operates in a cross-functional manner.





Roles and responsibilities of the ASC and ESG Core Working Group are well defined. ESG aspects and Risk Management are further incorporated within the organization by establishing the following, as per the international standards and frameworks:

- a) Enterprise Risk Management System guided by the Chief Risk Officer, and;
- b) Integrated Management Systems (IMS) guided by Management Representatives (MR) for various management systems.

At Adani Power Limited, through the resolution of the Board of Directors, the responsibility for extra-financial disclosures has been delegated to the CEO. All strategic and operational responsibilities, including climate-related issues, sustainability performance and value creation are executed by him. Key indicators of value creation and sustainability performance are monitored and reviewed by the CEO and the results are deliberated at the Board of Directors (the Board) level on a quarterly basis.

The Company has developed a Enterprise Risk Management (ERM) based on COSO (The Committee of Sponsoring Organizations of the Treadway Commission) framework. This system is implemented across the company to enable all employees and business associates to raise any risks identified by them till the next level.

The IMS also includes the Energy Management System as per the ISO 50001: 2018, which culminates into various objectives and targeted and management plans for energy efficiency, leading to climate change mitigation.

The Head-ESG, and Sustainability is designated with his role to support the CEO in establishing systems for monitoring, continual improvement, and internalization of the Climate Change and ESG aspects into the business. He also coordinates with ESG Steering Committee and representatives of various management systems for development of the Company's ESG and Sustainability disclosures and Integrated Report in line with GRI Standards, IFC, SDG, UNGC, and the Integrated Reporting framework.

## Strategy

**Short-term:** The Company considers a short-term horizon of five years starting from the current year (FY 2020-21) till FY 2025-26, where the physical and regulatory risks of immediate future are taken into consideration.

**Medium-term:** A medium-term horizon of 5-10 years will indicate the acceptance of physical change and

pursue stability to the organization and operations from regulatory and policy changes and assess the required modification or upgradation.

**Long-term:** A long-term horizon of 10-20 years of the period is considered to achieve the company's long-term targets.

## Current Regulations

The Government of India imposed a cess on domestically produced and imported coal as India's Nationally Determined Contribution (NDC) includes fiscal policies in its climate action toolkit. This includes "instruments like coal cess, cuts in subsidies, increase in taxes on petrol and diesel" (the Republic of India, 2015), and the Company is complying with this regulation.

In addition, the Bureau of Energy Efficiency (BEE) launched The Perform, Achieve, and Trade (PAT) Scheme. The objective of this scheme is to reduce energy consumption and promote enhanced energy efficiency among specific energy-intensive industries in the country. In the first cycle of this scheme which started in FY 2014-15, and since the second cycle which lasted from 2016 to 2019, all the nominated APL subsidiaries actively participated and got audited periodically.

## Emerging Regulations

Any upcoming environmental or climate change related regulation in the country is introduced by the Ministry of Environment, Forests and Climate Change (MoEFCC), in consultation with the industry and Ministry of Power. APL is still committed to comply with the statutory requirements and upgrade the systems from time to time. In the future, the limit for CO<sub>2</sub> emissions may be introduced in India, which can be met either by a change in existing technology or by carbon trading. This will increase financial liability on the Company for compliance as well as possible violations. The Company is actively participating in various studies/research for the preparedness of the emerging regulation.

## Technology

The Company has been at the forefront in adopting best-in-class technologies for thermal power generation, thereby ensuring optimum levels of efficiency and mitigating climate change. APL's Mundra power plant is India's first super-critical technology-based 660 MW generating unit. APJL, a subsidiary of APL, is installing ultra-supercritical technology which improves energy and resource efficiency.

## Market

Increasing concerns about climate change and growing international commitments to contain global warming are expected to result in a major policy shift towards renewable sources of energy and energy efficiency. Although the share of coal-based power generation in India is expected to drop in India's energy mix, we expect net capacity additions to maintain the base load in the grid to meet the growing demand. The government has taken several policy initiatives to further boost the load requirement in the grid. Some of these are electricity connection to the remotest corners of the nation, agricultural feeder separation, strengthening of rural grids, and policy fostering the e-vehicle market. At the same time, demand growth has been somewhat muted due to fewer PPAs being signed by DISCOMs in India, despite the government's initiatives to improve the overall health of the power sector, such as improving domestic coal availability and the performance of DISCOMs.

The Ujjwal DISCOM Assurance Yojana (UDAY) to reduce DISCOM losses is critical to translating increased demand into new PPAs. These initiatives are likely to lead to the signing of more PPAs in the next 3-4 years, and we are well-positioned to leverage this opportunity. Over the past several years, we have stood at the forefront of this capacity-building effort and delivered four world-class power plants supplying electricity at some of the most competitive rates. Under the Indo-Bangla Friendship Treaty of 2010, we are developing a 1,600 MW thermal power plant at Godda in Jharkhand for supplying power under a long-term PPA to the Bangladesh Power Development Board. Godda TPP will be the first thermal Power project in India dedicated to export of Electricity.

Further, with the implementation of PAT and its coverage to most of our operating plants, the Company has taken many energy-saving initiatives. The baseline assessment is completed for the Mundra Power Plant and is underway for the remaining plants. The better than PAT target performance has enabled two of our plants to generate EScerts and revenue as an incentive for the higher energy efficiency performance.

## Acute Physical

Change in precipitation rates may affect water availability in our hinterland power plants. The Company has conducted the Water Source Sustainability Study for its hinterland plants, which addresses downstream impact assessment and includes water management and conservation plan. All these identified low impacts are a part of the risk management and business continuity plans (BCP). The event-driven risks including increased severity of extreme weather events, such as cyclones, hurricanes and floods are covered under the appropriate insurance policies.

Tropical storms are continuously monitored, and all probable plants affected are informed and warned. Similarly, Heatwaves' situations will be alerted to all asset managers to deal with the situation as per the defined procedures.

SOPs for proper early warning systems are developed using state-of-the-art technology tools and applications, and training is imparted to all Asset Management teams.

The below mitigation measures are followed for the identified acute risks:

- Continuous monitoring of weather and informing and warning all the probable affected plants for readiness
- Usage of technology tools to predict and give early warning
- Routine monitoring of physical assets during windstorms
- Designed to withstand wind speeds due to tropical storms like cyclones and tornadoes
- Ensured preparation through SOPs and maintenance checks
- An emergency response plan is established and mock drills are carried out

## Chronic Physical

The Company recognized the need to get realistic climate projections and evaluate the risks from emerging regulations, physical risk to the critical infrastructure like power plants and T&D lines connecting to the grid, among others. The Company used the IPCC's RCP 4.5 scenario (equivalent to 1.7-3.2°C) and studied the following impacts.

Projected change in Monthly maximum temperature, Monthly precipitation, Severe drought likelihood, Probability of heat/cold wave, Mean drought index, and Land projected to be below the annual flood level.

The initial study included all the power plants, major T&D lines, and supply chain, including logistics. The analysis does not show any significant risk to infrastructure during the study period. All the identified low impacts are a part of the risk management and business continuity plans (BCP).

The projected impacts included low risks from increased temperature affecting water availability and coastal flooding for some plants and ports used in sourcing of coal.

For these sites, appropriate quantification of risk and mitigation measures are being developed. These include maintaining sufficient coal stock during possible high precipitation events and increased water reservoirs to operate the plant, in the event of any water shortage for a few days.





In view of this, the Company addresses the issue of rising sea levels and cyclonic surges due to global warming. Finished floor level of Mundra Power Plant has been raised to 10 m above the Chart Datum (CD), the lowest astronomical tides and mean low water, whereas the highest high tide recorded is 5.4 m above the CD.

To adapt to the increase in water temperatures owing to climate change in the future, all our thermal power plants are equipped with either induced or natural draft cooling towers with a re-circulation system. This will help in maintaining the desired temperature difference across the condenser and ensuring plant efficiency over time.

All the identified risks are validated and prioritized to finalise a risk mitigation and control plan, which is monitored regularly. The risks and mitigation strategies are discussed in the top Management Committees and later presented to the Board. We constantly leverage these opportunities and minimise risks by improving project execution proficiency and operational efficiency. We build on our business strategies based on identified risks and opportunities to meet the needs of diverse stakeholders and remain competitive.

The Company has developed a well-laid Risk Management framework, as per COSO. The substantive financial risks are defined as:

‘Very significant loss due to closure/stoppage of operations beyond 1 day, improper utilization of resources

of material value (> 1% of profit or revenue), reputational loss due to community issues, damage to critical machinery, fatal accident.’ The potential financial impact from these critical risks can be above ₹ 50 crore.

- The Company recognized the need to get realistic climate projections and evaluate risks from emerging regulations, and physical risk to the critical infrastructure. The Company has used the IPCC’s RCP 4.5 scenario (equivalent to 1.7-3.2°C) and studied the following impacts. The climate impact projections are studied for FY 2020-39 and identified the following impacts:

Projected changes in Monthly maximum temperature,

- Monthly rainfall range,
- Severe drought likelihood, and
- Land projected to be below the annual flood level.

The different impacts that the climate scenarios had on our strategy are:

#### On our Products and Services:

- Our engineering, business development and finance teams are involved in analysing the impacts on our operational sites and identifying the financial and infrastructural impacts

#### On our Supply Chains:

- The Company reviews various risks and does a detailed due diligence at the time of vendor on-boarding\*. As a part of the ESG risk assessment, critical suppliers are identified based on the below criteria:

1. Critical component suppliers or similar
2. Non-substitutable suppliers or similar
3. Hazardous waste handling supplier

Based on the definition, critical suppliers are identified and risks levels are prepared.

For all critical suppliers, the Company takes extra precautions and engages actively for ESG related aspects.

All of our purchase and service orders (PO and SO) contain General Conditions of Contract (GCC) to follow applicable rules, regulations and ethical behaviour (anti-corruption; anti-bribery). The PO and SO also contain appropriate escalation matrix for the technical and commercial matters / grievances respectively. As part of the risk mitigation, critical vendors are spread from domestic to overseas. This should help the Company operate without disruption in any unforeseen event of climate impacts such as drought, flooding and cyclones in any part of the country.

#### On Investment and R&D:

- APL is in electric utilities sector and depends on the Original Equipment Manufacturers (OEM) for the supply of main plant and critical equipment. The Company has adopted several new technologies, such as setting up the first supercritical power plant in India; and the 800 MW unit for power generation and various other energy efficiency equipment.
- Adani Power Training & Research Institute (APTRI) is the Research and Performance Consulting Center of Adani Power. APTRI endeavours to contribute to the Global Sustainability and Indian Skill Development Initiatives through its scientifically designed and utility/organizational need-based customized program. The programs and activities are aimed at performance and efficiency improvement, and enhancing the delivery of electricity.

Research and performance consulting programs and the activities of APTRI cover the entire electric power value chain including coal mining, logistics, thermal and solar power generation, transmission (HVAC and HVDC), distribution and end-use of electricity.

APTRI also shares its expertise in the niche areas of port operation, water management, and cement manufacturing.

The world-class infrastructure and capability in terms of program design and delivery, faculty and content quality of APTRI at Mundra has been well recognized. The center is accredited as Grade ‘A’ and Category-I Institute by CEA, Ministry of Power, Government of India.

- Moreover, we are also engaging with several internal and external research agencies for exploring various Fly Ash utilization schemes: establishing a Fly Ash Utilization Promotion and Research Park at Tiroda.
- Engaging with Advanced Materials and Processes Research Institute (AMPRI), Bhopal, a unit of the Council of Scientific and Industrial Research (CSIR), Government of India, for research on Fly Ash utilization for soil conditioning.

#### On our Operations:

- We ensure that we achieve operational excellence through the use of established management systems, excellence frameworks and constantly bringing about process improvements.

On a consolidated basis, about 75% of the power generation in APL comes from supercritical power generation technology. This saves ~2% of the fuel per unit of power generated, serving to reduce GHGs per unit.

- Whenever the Company moves for expansion in thermal power generation, it follows a policy that any future Greenfield expansion will be based only on supercritical technology and the latest configuration machines. This is aimed at fulfilling the requirement of base load demand and grid stability in the country.

#### Risk Management

The process of risk identification is collectively performed by a cross-functional task force. This includes the Risk Analyst, Project Engineering Manager, Project Procurement Manager, Project Control Manager, Project Contract Administrator, Construction Manager, Commissioning Manager, Operations and Maintenance (O&M) Manager, Health, Safety and Environment (HSE) Manager, Quality Manager, and Land Acquisition Manager, with support from heads of these respective businesses.

\*Refer ‘Manufacturer Assessment Form’ on weblink: <https://www.adanipower.com/Commercials>



## Resource Efficiency



### Energy consumption outside the organization

The energy consumption in the coal transportation-sea and road routes was 46,768 TJ.

We realise the criticality of optimization of material consumption and have taken adequate measures translating into and delivering value to our stakeholders and communities. We are also taking the requisite measures that help in optimising production costs and reducing burden on the environment by minimising consumption of natural resources and waste generation. The nature of the sector in which we are operating makes it inapplicable for recycled material as an input in manufacturing and reclamation of product. We are committed to adopt continuous measures for effective and efficient use of material resources, thus reducing the burden on the environment. During the said financial year, the Company consumed the following key materials for O&M activities.

Our operations consumed 623.17 million GJ of energy during FY 2019-20, as compared to 537.85 million GJ consumed in FY 2018-19. This was in the form of primary fuels such as coal, HFO and LDO used in boilers and High-Speed Diesel (HSD) used in vehicles and machinery. In the event of power outage or shutdown activities, we also purchase electricity from the grid. During FY 2019-20, we purchased 17.81 million unit of electricity. The total auxiliary power consumption stood at 18.02 million GJ, as compared to 11.30 million GJ during FY 2018-19.

This Report does not include energy consumed for activities in downstream operations. However, energy consumption and specific GHG emissions from upstream coal transportation are being monitored.

### Material Consumption

| Material Consumption (in MT)                              | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|---|------------|------------|------------|------------|
| Coal Consumed   | 40,265,480 | 33,506,157 | 27,387,237 | 33,959,200 |
| Chemicals Used  | 11,779     | 10,387     | 9,106      | 9,551      |
| Lubricating Oils  | 194        | 102        | 153        | 201        |
| Grease  | 33.2       | 24.5       | 24.9       | 27.3       |
| LDO/HSD Consumed  | 4,075      | 3,446      | 3,358      | 3,055      |
| HFO Consumed  | 2,685      | 535        | 1,238      | 1,832      |
| Diesel (Consumed in equipment and Company-owned vehicles) | 1,688      | 1,527      | 1,774      | 2,275      |

GRI 301-3

GRI 302-1

GRI 302-2

## Water conservation and enhancing water resources

GRI 303-1

GRI 303-2

GRI 303-3

GRI 303-4

GRI 303-5



As a shared resource, water conservation and management at APL is driven by the below factors:

- Helps increase efficiency
- Helps minimise effluent waste
- Got extended positive impacts on water tables and watershed of the area in which our operations and plants are located

Our approach to water conservation can be classified into three broad areas:

1. Optimising water usage within plant operations
2. Treating and using recycled water to minimise outflow of effluents and waste water
3. Enhancing water resources in the watersheds where we operate

For our coastal operations, the usage of marine water has already ensured lesser or minimal dependence on ground or surface water. The way we prioritise water conservation is articulated in our Environmental Health & Safety (EHS) Policy.

A major portfolio of the Company is focused on the business of thermal power generation. In our operations, water is principally used to generate superheated steam and power the turbines. Therefore, continued availability of water is of paramount importance. The Company has two seawater-based thermal power generation subsidiaries – APMuL and UPCL. At all the operating power plants, the total water withdrawal is measured with water flow meters at all sources of withdrawal and all storage locations.

We have set an internal target of 2.5 m<sup>3</sup>/MWh of surface water for our hinterland power plants, which is well within the regulatory limit of 3.5 m<sup>3</sup>/MWh. Although, there is no regulatory limit on seawater consumption, we have set an internal target of 9.5 m<sup>3</sup>/MWh at plants with seawater-based Flue Gas Desulphurization (FGD); and of 6 m<sup>3</sup>/MWh at plants without seawater-based FGD. During the reporting year, seawater consumption was 9.29 m<sup>3</sup>/MWh at the Mundra power plant and 7.73 m<sup>3</sup>/MWh at the Udupi power plant.



Mr. Chaitanya Prasad Sahoo  
Head Thermal - O&M

“Our O&M Excellence strategy has Safety, Reliability and Efficiency as the three pillars. Adani Energy Network Operation Centre (ENOC) uses on-line data of all the plants for remote monitoring, automated reporting, benchmarking and uses tools to help improve our performance. It also facilitates quick troubleshooting and efficient decision making by leveraging the central pool of experts and advanced AI/ML. We are proactively deploying the latest technology like drones, for inspection of difficult to approach high-rise structures (Natural Draft Cooling Tower and chimneys), which is a safer alternative method along with better accuracy, lower cost and time saving. Going forward, we will continue to adopt technology further in our O&M processes for seamless & coordinated operations of our plants.



Shankar Sengupta  
Head - Engineering

“We have committed and agile teams with deep sector experience and domain expertise in O&M, power sector regulation, project management, and business development. We are leveraging the best available technologies to further improve efficiencies and reduce our environmental footprint. All operating power plants of the company are certified for Energy Management System ISO 50001, that drives continual improvement.



In case of seawater-based plants, the water is taken through intake channels, which is measured by make-up volume of cooling tower and FGD. The water source intake is metered and flow data compiled monthly and flow volume is calculated based on the time of water intake.

Water quality is a crucial parameter for the efficient operation of thermal power plants. The Company monitors the quality of water withdrawal regularly. It also has desalination plants for its seawater-based plants. Water is treated and its quality is ensured before putting it to operational use.

Optimising water usage within plant operations

Water is principally used to generate superheated steam that powers our turbines. We are working to minimise the withdrawal of surface water during the summers. To further enhance water's productivity, internal assessments are carried out to study the usage patterns, identify leakages and come up with innovative ways to optimise its usage.

Water Risk Management

APL uses WRI- Aqueduct for Water stress and drought risk assessment, and India Water Tool developed by World Business Council for Sustainable Development (WBCSD) and partner organizations. These tools bring together the datasets and risk indicators from the Government of India and other institutions, to help users understand their water risks and plan interventions for water management in India.

GRI 303-1  
Refer from CDP

GRI 303-2/  
303-1,2,5

APL manages the water-related risks in term of regulatory changes in price as well as water availability. (a) As a strategic decision, more than 46% of our total generation capacity comes from the power plants in coastal areas using sea water which is available abundantly and the extraction of which is less likely to be affected by regulations. (b) For the power plants in hinterland areas, we use surface water for operational purpose. (c) Study for source sustainability of surface water availability is conducted based on last 30-50 years data for different scenarios. (d) Long-term water allocations are obtained from Ministry of Water Resources in respective states. (e) Binding agreement to draw water is signed with irrigation departments of the states that gives us a guarantee for water availability at a fixed price for our operations and mitigate the risk of regulatory changes.

The Company is engaged in power generation through its operations of coal-based power plants across India. It carries out Environmental Impact Assessment (EIA) studies for all its projects through NABET accredited agencies and institutes of repute. The EIA has identified and classified potential water pollutants associated with its business. The Company has also implemented an Environmental Management Plan (EMP) to eliminate and mitigate the detrimental impact on water ecosystems, human health and community.

The Company also adopts precautionary approaches through due diligence and a risk identification process. The Integrated

GRI 306-1

GRI 306-5

GRI 303-3

GRI 303-5

Management System identifies the ways in which the Company's operations affect its ecosystems and human health. It tracks the reportable EHS events and performs root cause analysis to prevent this from recurring again.

The Company ensures water quality by regularly getting it monitored by the National Accreditation Board for Testing and Calibration Laboratories (NABL) accredited third party institutes, as per the state regulatory requirements. The water quality report has been submitted to the Ministry of Environment Forest and Climate Change (MoEFCC), along with the six-monthly Compliance Report.

Process water for our hinterland plants is being consumed within the plant premises. And hence, we do not anticipate any detrimental impact of this on our water ecosystems or human health.

During the reporting year, the plants achieved specific water consumption close to 2.5 m³/MWh, as against the statutory limit of 3.5 m³/MWh. Seawater consumption has no stipulated limit in India. However, for seawater-based power plants, we have set a stretched internal water consumption target of 9.5 m³/MWh in case of seawater FGD at Mundra, and that of 6 m³/MWh in the case of limewater FGD at Udupi. The Mundra and Udupi power plants managed to nearly accomplish these internal targets during FY 2018-19.

Water Withdrawal (m³)

|                        | FY 2019-20  | FY 2018-19   | FY 2017-18   | FY 2016-17   |
|------------------------|-------------|--------------|--------------|--------------|
| Groundwater            | 0           | 0            | 0            | 0            |
| Municipal supply water | 0           | 0            | 0            | 0            |
| Surface water          | 80,147,938  | 68,829,307   | 56,054,563   | 64,457,539   |
| Purchased water        | 16,925      | 24,835       | 15,315       | 17,095       |
| Seawater intake        | 302,262,659 | 25,64,52,773 | 27,00,03,717 | 34,24,01,436 |
| Total Water Withdrawal | 385,607,131 | 32,75,36,474 | 327,479,364  | 412,538,946  |



Mr. Pramod Saxena  
Station Head - APMuL

Adani Power created history by synchronising the first super-critical technology-based 660MW generating unit at Mundra. This is the first super-critical generating unit in India. We still continue to set the precedent for others in the industry – be it, by taking actions on climate adaptation, or eliminating groundwater usage completely. We will continue to epitomise Adani Group's core philosophy of 'Growth with Goodness'.



## Water Consumption – (m³)

|                  | FY 2019-20  | FY 2018-19  | FY 2017-18  | FY 2016-17  |
|------------------|-------------|-------------|-------------|-------------|
| APMuL            | 52,650,263  | 42,828,453  | 44,486,613  | 59,050,765  |
| APML             | 51,562,003  | 49,534,444  | 41,907,337  | 43,937,667  |
| APRL             | 20,769,204  | 20,399,442  | 14,785,943  | 22,182,748  |
| UPCL             | 12,067,982  | 9,033,260   | 19,481,394  | 23,158,118  |
| REL              | 9,744,919   | -           | -           | -           |
| REGL             | 1,083,163   | -           | -           | -           |
| Bitta            | 16,925      | 24,835      | 15,315      | 17,095      |
| APJL             | 39,840      | -           | -           | -           |
| APL consolidated | 147,934,299 | 121,820,434 | 120,676,603 | 148,346,393 |

GRI 303-3

GRI 303-4

GRI 303-5

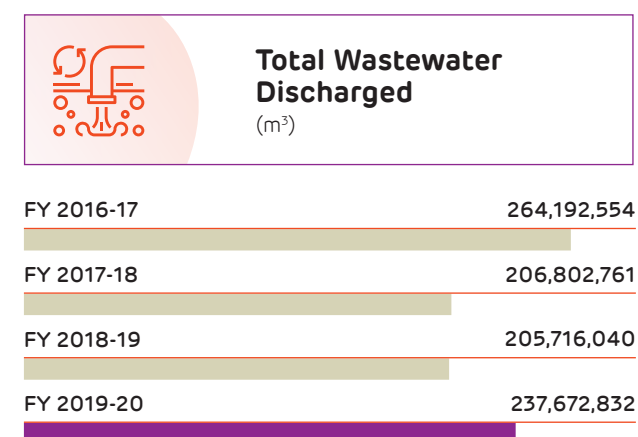
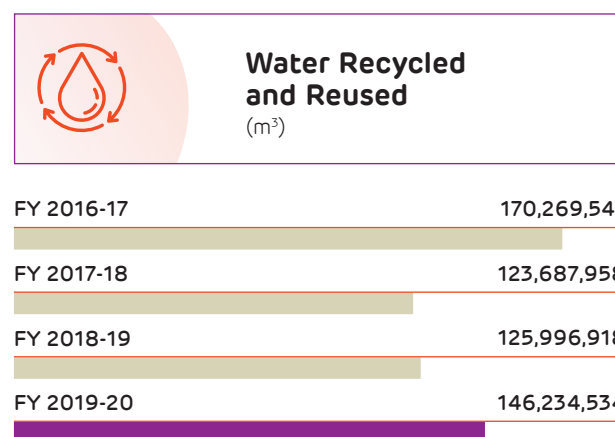
## Water Withdrawal (m³) Source-wise in FY 2019-20

|                              | APMuL       | APML       | APRL       | UPCL       | REL       | REGL      | Bitta  | APJL   |
|------------------------------|-------------|------------|------------|------------|-----------|-----------|--------|--------|
| Groundwater                  | 0           | 0          | 0          | 0          | 0         | 0         | -      | -      |
| Municipal supply water       | 0           | 0          | 0          | 0          | 0         | 0         | -      | -      |
| Surface water                | 0           | 51,562,003 | 18,570,997 | 0          | 9,669,986 | 305,112   | -      | 39,840 |
| Purchased water              | 0           | 0          | 0          | 0          | 0         | 0         | 16,925 | -      |
| Seawater intake              | 277,054,722 | 0          | 0          | 25,207,937 | 0         | 0         | -      | -      |
| Rainwater harvested and used | 0           | 0          | 2,198,207  | 128,418    | 74,933    | 778,050   | -      | -      |
| Total Water Withdrawal       | 277,054,722 | 51,562,003 | 20,769,204 | 25,336,355 | 9,744,919 | 1,083,162 | 16,925 | 39,840 |

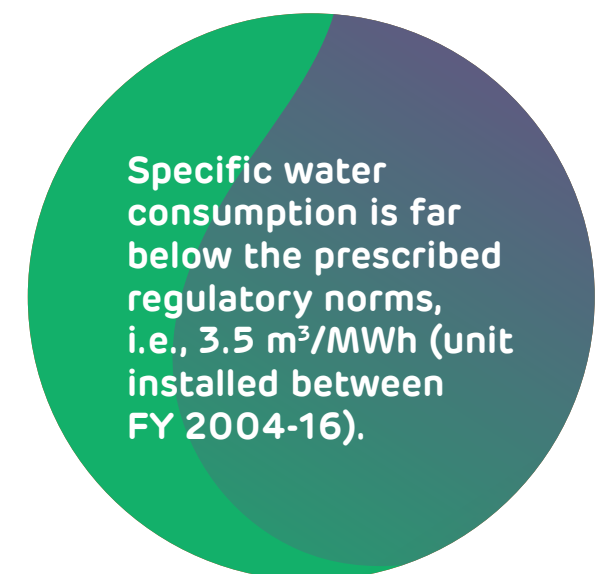
\* for (Groundwater and Municipal supply water) both use isn't permitted, Municipal supply is not available at these plants (not in any Municipal boundaries)

## Specific Water Consumption

| Specific Water Consumption (m³/MWh) | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|-------------------------------------|------------|------------|------------|------------|
| Hinterland plants - average         | 2.34       | 2.50       | 2.50       | 2.50       |
| APMuL                               | 9.29       | 9.57       | 10.65      | 10.02      |
| APML                                | 2.22       | 2.29       | 2.38       | 2.49       |
| APRL                                | 2.60       | 2.68       | 2.92       | 2.67       |
| UPCL                                | 7.73       | 5.51       | 6.07       | 5.45       |
| REL                                 | 2.32       | -          | -          | -          |
| REGL                                | 2.24       | -          | -          | -          |
| Bitta                               | 0.26       | 0.33       | 0.21       | 0.35       |



\*This is not waste water, but blowdown water allowed for sea discharge as per EC.



Mr. Kanti Biswas  
Station Head - APML

“The largest coal-based thermal power generation plant in Maharashtra, the Tiroda operations have achieved the highest level of operational excellence through business process transformation initiative setting highest benchmark in operational efficiency parameters.”



### Enhancing water resources in the watersheds where we operate

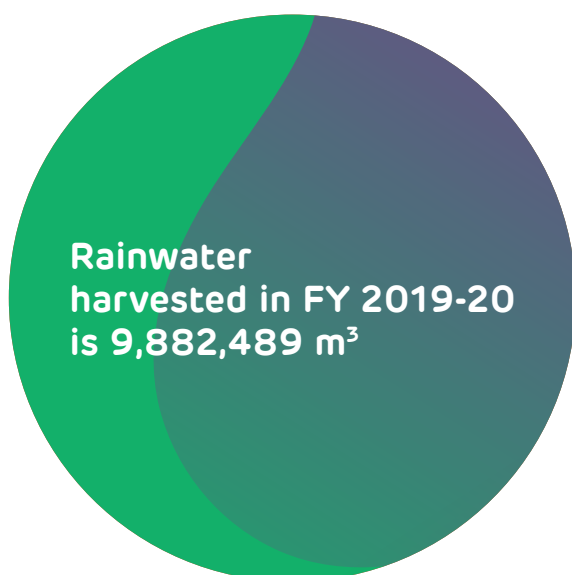
We use the India Water Tool developed by the World Business Council for Sustainable Development (WBCSD) and partner organizations. The tool brings together the datasets and risk indicators from the Government of India and other institutions. It helps users understand their water risks and plan interventions for water management in India. The tool provides overall water availability index in six categories ranging between "extremely low" to "extremely high". The 'extremely low', 'low' and 'low to medium' categories are considered as water-stressed areas for mapping of our power plants.

Three plants of the Company fall in "extremely low" category of overall water availability. These plants are located in APRL at Kawai, and the two recently acquired power plants in Chhattisgarh. The APML plant at Tiroda falls under the "low" water category; APL Mundra falls in "low to medium" category; the APJL plant at Godda falls under the "medium to high" category; while the UPCL plant at Udupi falls in "high" water availability category.

Moreover, the results of the IMD study have guided us in making rational use of surface water. At Tiroda, we are steadfastly working towards better watershed management. De-silting and cleaning community water ponds were one of our interventions to improve groundwater recharge. To continue with the operations without eroding Natural Capital, the water storage capacity has been augmented



GRI 303- 1,2,5



to cater to 53 days of operations requirement at Tiroda and 23 days at Kawai, to ensure continuity of operations during the lean season.

Rainwater harvesting has been initiated within the plant premises to bring down withdrawal of surface water. At Mundra, rooftop rainwater harvesting is being deployed to recharge groundwater and mitigate seawater ingress. At Kawai and Udupi, rainwater harvesting facilities have been constructed. This utilized 2.2 million m<sup>3</sup> and 0.13 million m<sup>3</sup> of harvested rainwater, respectively, which was used for plant operations.

### Godda – Pond deepening activity

Deepening work of 37 ponds has been accomplished in 26 villages with an aim to increase water storage capacity of ponds and the groundwater level. More than 650 acres of agricultural land from 7 villages depends on these ponds for irrigation purposes. However, owing to lack of storage capacity, the pond can provide irrigation to only 100-150 acres of agricultural land. These ponds are excavated for enhancing their water storage capacity by deepening them.

Pond deepening work will enhance crop intensity and irrigation area in more than 1,050 acres of agricultural land, with net increase of 1,01,590 m<sup>3</sup> in storage capacity. Apart from agriculture, alternative livelihood options have also increased in the area including livestock development and pisciculture, among others. In addition, the work will boost groundwater levels in wells and borewells in the said area. With availability and increase in water storage, we may introduce scientific methods of agriculture such as SRI methods in paddy and other crops.

### Treating and Recycling of Waste Water

The total volume of wastewater generated and treated wastewater discharged at Mundra and Udupi plant stood at 224 million m<sup>3</sup> and 13.3 million m<sup>3</sup>, respectively, during the reporting year. The cooling towers at these plants are seawater. Mundra and Udupi are seawater-based and the discharged water is essentially a blowdown of the cooling towers.

We ensure the maintenance of temperature differential within the prescribed limit of 5°C before discharging water from the premises. We have set up an effluent and sewage treatment plant, a coal run-off treatment plant and a secondary Reverse Osmosis (RO) plant.

Besides the core processes, water is required for dust suppression in coal handling and for purging out bottom ash generated in the boilers. We meet our water requirement for secondary processes through recycled and reused water from the water treatment plants.

## Waste Management

One of the biggest challenges faced today is the disposal, reuse and management of solid waste, primarily fly-ash. We recognise the challenges of solid waste disposal and landfill management.

### Fly-Ash management

To overcome the challenges presented by fly-ash and its disposal, we are focused on a multi-pronged approach. One, changing the nature of the raw material used. This, in our case, implicates usage of better quality coal, with relatively lesser ash content. Two, identifying several innovative and optimal methods of fly-ash utilization. Three, managing the disposal in a manner which has minimal impact on the surrounding ecosystem.

The Central Government has emphasized the need to optimally use ash from the power plants. Utilization of fly ash can be a challenge

for the entire power sector, considering the total quantity of ash generated. At APL, we were able to accomplish an impressive utilization rate of 97.9% by ensuring scientific and environmentally sound disposal during the year.

Considering fly ash to be a useful resource, we developed infrastructure that supports the handling and selling of fly ash. This helped increase our ash supply for utilization to specialized agencies for use in cement manufacturing.

For Mundra, Kawai and Udupi plants, the utilization rates of fly-ash was 100%.

The Company has set a target of achieving 100% utilization of fly ash by 2025, and is continuously striving to achieve the target earlier than that.

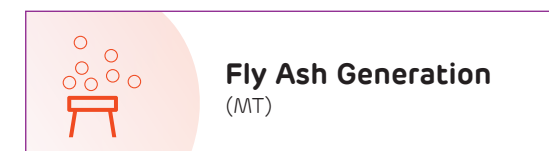


GRI 306-3

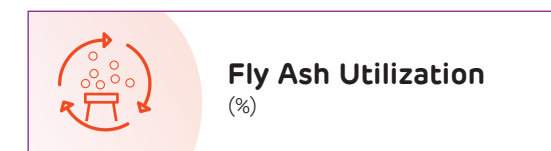


GRI 306-4

### Fly-ash generation and utilization trend



|            |           |
|------------|-----------|
| FY 2016-17 | 5,169,542 |
| FY 2017-18 | 4,848,918 |
| FY 2018-19 | 6,541,666 |
| FY 2019-20 | 8,115,601 |



|            |      |
|------------|------|
| FY 2016-17 | 65.8 |
| FY 2017-18 | 87.9 |
| FY 2018-19 | 93.2 |
| FY 2019-20 | 97.5 |



**Mr. Arindam Chatterjee**  
Station Heads - APRL

Adani Power Rajasthan Limited (APRL) is the largest power producer plant in Rajasthan at a single location. The best-in-class supercritical technology paired with certifications like Quality Management System (ISO 9001: 2008), Environmental Management System (ISO 14001: 2004), Occupational Health and Safety Management System (OHSAS 18001: 2007), make the plant resource efficient.





GRI 306-2

**Other Hazardous and Non-hazardous Waste Management**

The utilization and disposal of hazardous and non-hazardous wastes generated by power plants are governed by strict regulations. Ash is a non-hazardous waste and a material aspect for the Company, considering the quantity and challenges for utilization in certain geographical areas, such as the Tiroda plant.

The hazardous wastes generated are used oil, spent resins and empty oil containers. These

are disposed of through authorized agencies in accordance with the Hazardous Waste Handling and Management Rules. During the financial year, no significant spills were reported. We do not use any Polychlorinated Biphenyls (PCBs) and, therefore no generation of PCB waste was recorded. We do not engage in import or export of any hazardous waste or materials under the Basel Convention. There is no radioactive waste generated and disposed of from our power plants.

**Hazardous and Non-hazardous Waste\* Disposed****A) Total Non-Hazardous Waste Disposed (MT)**

|                                  | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|----------------------------------|------------|------------|------------|------------|
| <b>Total Metallic Waste</b>      | 3,326      | 4,319      | 2,471      | 3,291      |
| <b>Total Plastic Waste</b>       | 576        | 419        | 238        | 315        |
| <b>Total Paper Waste</b>         | 4.22       | 18.3       | 39.3       | 6.38       |
| <b>Total Organic Waste</b>       | 58.87      | 34.5       | 31.7       | 51.4       |
| <b>Total Miscellaneous Waste</b> | 639        | 734        | 1,749      | 1,675      |

**B) Hazardous Waste Disposed (MT)**

|                                 | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|---------------------------------|------------|------------|------------|------------|
| <b>Used/Spent Oil</b>           | 145        | 83.0       | 150        | 102        |
| <b>Total Oil Soaked Waste</b>   | 3.92       | 3.55       | 3.18       | 1.63       |
| <b>Total Spent Ion Exchange</b> | 0.51       | 9.51       | 56.6       | 0.31       |

\*as per applicable regulatory classification

**Other Waste (MT)**

|                               | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|-------------------------------|------------|------------|------------|------------|
| <b>Lead Acid Batteries</b>    | 31.04      | 66.6       | 24.2       | 110        |
| <b>E-Waste</b>                | 19.65      | 5.33       | 9.58       | 6.30       |
| <b>Total Biomedical Waste</b> | 0.09       | 0.09       | 0.07       | 0.08       |

## Air Emissions Management



GRI 305-7



GRI 301-2

In December 2015, the Ministry of Environment, Forest and Climate Change (MoEFCC) issued the Environment (Protection) Amendment Rules, 2015. It also set specific limits on water and stack emissions from thermal power plants for SO<sub>x</sub>, NO<sub>x</sub>, Particulate Matter (PM) and mercury. Accordingly, the Central Electricity Authority (CEA) has mandated all the operating power plants to install suitable devices to achieve new emission standards and the Central Pollution Control Board (CPCB) issued directives in this regard. While all our existing

operational units are already compliant with the new emission standards for mercury and PM, some of the units are in the process of installing new devices for meeting SO<sub>x</sub> and NO<sub>x</sub> emission norms.

During FY 2019-20, we initiated the International Commercial Bidding process for the installation of Flue Gas Desulphurization (FGD) equipment. We are on track to meet the new emission standards for all the power plants, in accordance with the plan laid out by the CEA.

**Air Emissions (MT)**

| SO <sub>x</sub> |            | NO <sub>x</sub> |           | Particulate Matter (PM) |          |
|-----------------|------------|-----------------|-----------|-------------------------|----------|
| FY 2016-17      | 114,906.36 | FY 2016-17      | 69,702.58 | FY 2016-17              | 9,088.86 |
| FY 2017-18      | 109,279.23 | FY 2017-18      | 57,279.94 | FY 2017-18              | 8,007.54 |
| FY 2018-19      | 192,920.26 | FY 2018-19      | 71,730.77 | FY 2018-19              | 9,276.32 |
| FY 2019-20      | 204,609    | FY 2019-20      | 85,070    | FY 2019-20              | 11,665   |



**Mr. Pravat Sundaray**  
Station Heads - UPCL

“ Situated in the western coastal region of India, UPCL not only prides itself as the first Independent Power Plant (IPP) using 100% imported coal as fuel, but also for the resource efficient operations which are designed for resource conservation and minimization of waste and emissions. We at UPCL meticulously take efforts towards biodiversity conservation and enhancement.

### 'Circular Economy' - Presenting several opportunities

The concept of enabling a circular economy helps relook the current processes of value creation and development model. It helps identify how value can be enhanced, recreated or rethought. Our approach to circular economy involves combining innovation, finding opportunities for sustainability, and to respond to the bigger environmental and social questions. This approach to a 'circular economy' in the coal-based thermal power generation business entails as below:

1. Understanding Circular Design
2. Identifying Circular Use
3. Recovering Value



Biodiversity

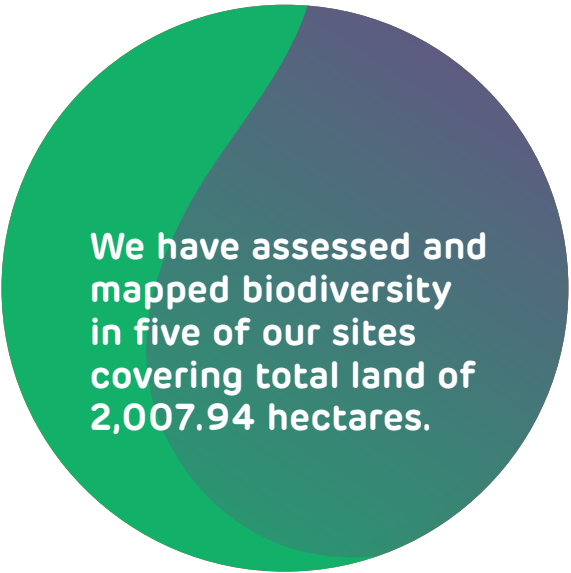
GRI 304-1,2,3,4

GRI 301-2

Conserving and protecting life on land and water is the overarching principle guiding our policy and actions on biodiversity management. We also take significant measures to enhance biodiversity in the regions we operate in.

Biodiversity Policy<sup>5</sup>

Endangered flora and fauna within a 10 km radius of our project locations are monitored. This is aimed to ensure that areas of biodiversity significance, protected regions or any red list species based on reports of the International Union for Conservation of Nature (IUCN) are not affected by the plant operations.



All the operating locations are outside the buffer areas and eco-sensitive zones notified around biodiversity hotspots. This includes wildlife sanctuary, national park and world heritage sites declared under applicable regulations or international treaties ratified by India.

Conservation begins with assessment

Assessing the biodiversity impact and risks of our operations is of utmost importance for us to take any measures on biodiversity conservation. In order to carry out these assessments, we partner with multiple national and internationally known experts in the field.

<https://www.adanipower.com/-/media/Project/Power/Sustainability/documents/Adani-Biodiversity-Policy>.

Below are our partners in this exercise:

- Site specific wildlife study conducted by NABET-accredited Wildlife Expert
- Marine impact assessment study through National Institute of Oceanography (NIO)
- Environmental Impact Assessment (EIA) studies for new projects through NABET accredited agencies and institutes of repute in India such as the National Environmental Engineering Research Institute (NEERI)



Mr. Rambhav Gattu  
Station Heads – REL & REGL

“As new additions to APL, the operations at REL and REGL are focused on leveraging the operational strengths, greater fuel availability, and improved cost recovery, thereby delivering value-accretive growth opportunities. Our primary emphasis will be on efficiency, safety, and sustainability.

Some of the key near-threatened or threatened species and Schedule-1 species have been identified at various operation sites

| Species   | Species Status  | Site   |
|---|-----------------|--------|
| 1 Black-necked Stork (Ephippiorhynchus asiaticus) | Near-threatened | Mundra |
| 2 Snake Bird/ Darter (Anhinga melanogaster)       |                 |        |
| 3 Black-Tailed Godwit (Limosa limosa)             |                 |        |
| 4 Great Stone Plover (Esacus recurvirostris)      |                 |        |
| 5 Eurasian Curlew (Numenius arquata)              |                 |        |
| 6 Black-Headed ibis (Threskiornis melanocephalus) |                 |        |
| 7 Painted Stork (Mycteria leucocephala)           |                 |        |
| 1 Blackbuck (Antilope cervicapra)                 | Near-threatened | Kawai  |
| 2 Painted Stork (Mycteria leucocephala)           |                 |        |
| 1 Indian Darter (Anhinga melanogaster)            | Near-threatened | Tiroda |
| 2 Indian Peafowl                                  | Schedule-1      |        |
| 1 Eurasian Curlew (Numenius arquata)              | Near-threatened | Udupi  |
| 2 Black-Headed ibis (Threskiornis melanocephalus) |                 |        |
| 1 River tern (Sterna aurantia)                    | Near-threatened | Godda  |

For assessing biodiversity in and around the vicinity of 10 km radius, following assessment is currently in practice for all the operational sites of APL.

- Data is collected from 7 villages falling within a radius of 10 km
- Accounting of total number of species of shrub, herb and tree species is done using the quadrates method
- Data is collected and maintained for CBH, DBH, radius and basal cover for each tree, shrub and herb species observed during the monitoring
- Identification and accounting of reptiles, mammals and amphibians is done in the study area
- The Shannon Diversity Index (H) is being used for characterising species diversity
- Number of migratory, resident migratory and local bird species in and around the plant premises are also identified
- The observed bird species are categorized into rare, endangered and threatened, according to the Wild Protection Act and as per the IUCN guidelines

Biodiversity protection and enhancement measures

Based on the assessments carried out, we have undertaken a plethora of initiatives at different locations addressing the requirements of specific species conservation.

At the Mundra location, we have developed an Eco Park, with an intention to provide shelter and a breeding ground to local and resident birds within an area of approximately 2 ha inside the plant premises. The area is covered with live fencing of Casuarina sp. and Prosopis juliflora

plant species. To attract birds, fruitivorous plants such as Sapota (Manilkara zapota), Pomegranates (Punica granatum), Neem tree (Azadirachta indica), Banyan tree (Ficus benghalensis) and Pilu (Salvadora persica) have been planted.

The Eco Park serves as a habitat for reptiles such as frog, lizard and snakes, whereas mammal such as Mongoose are occasionally sighted. A total of 28 local resident bird species have been identified during the monitoring.

Nagzira, New Nagzira and Koka Wildlife Sanctuaries fall within 25 km radius of the Tiroda Plant. In addition to the Environmental Impact Assessment, a separate study was conducted for prediction of impacts on Nagzira Wildlife Sanctuary due to Particulate Matter, gaseous and thermal emissions from the Tiroda Power Plant. This was conducted by an expert external agency in 2011. Besides, site specific wildlife conservation plans have been prepared and implemented.

The Company has set up ambitious targets to create a net positive biodiversity impact at all our operations and projects. At the time of proposing new projects, wildlife and biodiversity studies are also carried out. We are signatory to the Indian Business Biodiversity Initiative (IBBI), a Confederation of Indian Industry initiative.

Moreover, raising awareness biodiversity among the employees is one of the major efforts towards conservation initiatives.

Environmental Compliance

During the reporting year, there have been no violations of environmental regulations and there were no cases or litigations against APL on environmental issues.

GRI 307-1



# Social Report

66 Our People

66 Human Rights

Forced labour

Child labour

Working conditions

67 Diversity

68 Training and Development

Competent Manpower

70 Employee Well-being and Retention


74 Occupational Health and Safety

78 Responsible Supply Chain Management

79 Customer Health and Safety

80 Community Engagement and Development

CSR Initiatives



Our relationships represent our most important asset, when trying to balance growth with goodness. We strive to be a responsible organisation, be it as an employer, a business partner or a corporate neighbour.



## Alignment with other voluntary disclosures

| GRI   | UNGC                                      | SDG   | GRI  | UNGC  | SDG  |
|---|---|---|--|---|--|
| GRI 410: <b>Security Practices 2016</b>                               | <b>Human Rights</b><br><br>Principle 1, 2 | 10 – Reduced inequalities   | GRI 301: <b>Materials 2016</b>                         | <b>Environment</b><br><br>Principle 7, 8, 9 | 13 – Climate action<br>15 – Life on land   |
| GRI 411: <b>Rights of Indigenous Peoples 2016</b>                     |   |   | GRI 302: <b>Energy 2016</b>                            |   |  |
| GRI 412: <b>Human Rights Assessment 2016</b>                          |   |   | GRI 303: <b>Water and Effluents 2018</b>               |   |  |
| GRI 413: <b>Local Communities 2016</b>                                |   |   | GRI 304: <b>Biodiversity 2016</b>                      |   |  |
| GRI 414: <b>Supplier Social Assessment 2016</b>                       |   |   | GRI 305: <b>Emissions 2016</b>                         |   |  |
| GRI 401: <b>Employment 2016</b>                                       | <b>Labour</b><br><br>Principle 3, 4, 5, 6 | 3 – Good health and well-being<br>8 – Decent work and economic growth | GRI 306: <b>Waste 2020</b>                             |   |  |
| GRI 402: <b>Labor/Management Relations 2016</b>                       |   |   | GRI 307: <b>Environmental Compliance 2016</b>          |   |  |
| GRI 403: <b>Occupational Health and Safety 2018</b>                   |   |   | GRI 308: <b>Supplier Environmental Assessment 2016</b> |   |  |
| GRI 404: <b>Training and Education 2016</b>                           |   |   | GRI 205: <b>Anti-corruption 2016</b>                   |   | <b>Anti-corruption</b><br><br>Principle 10 |
| GRI 405: <b>Diversity and Equal Opportunity 2016</b>                  |   |   | GRI 206: <b>Anti-competitive Behavior 2016</b>         |   |  |
| GRI 406: <b>Non-discrimination 2016</b>                               |   |   | GRI 415: <b>Public Policy 2016 1</b>                   |   |  |
| GRI 407: <b>Freedom of Association and Collective Bargaining 2016</b> |   |   |  |   |  |
| GRI 408: <b>Child Labor 2016</b>                                      |   |   |  |   |  |
| GRI 409: <b>Forced or Compulsory Labor 2016</b>                       |   |   |  |   |  |
| GRI 202: <b>Market Presence 2016</b>                                  |   |   |  |   |  |



DMA

**ISO 45001**
 UNGC Signatory  
Employee Policies, CSR,  
Supplier CoC

The aspects that greatly influence our relationships with all our stakeholders include how we manage their expectations, the value we create for them and how we approach their concerns. People within and outside our organization comprise different stakeholder groups that we interact with. These stakeholder groups are our:

- People
- Vendors and Suppliers

- Customers
- Communities

The social factors that we influence directly or indirectly are diverse. And hence, our actions on managing stakeholder relationships are driven by a strategic approach and understanding of the material topics.

### Key Material Issues

Occupational Health and Safety

Industrial Relations

Human Rights – Forced labour, Child labour and Working conditions

Grievance (Environment, Human rights, Supply chain, Contract labour, Employees, and Community, among others)

Indigenous Rights

Security Practices

Cultural Heritage

Employment

Competent Manpower

Community Engagement and Development

### Strategic Objectives addressing the material issues



### Capitals Associated





# Our People

Our people are at the centre of all our business operations. Our commitment to our people's professional and personal growth is defined by the policies we have in place for their training, grooming and their overall well-being. Ensuring the best standards of occupational health and safety is of utmost importance to us.

## Human Rights



Upholding the human rights of our stakeholders that our business impacts – such as our employees, suppliers, contractual workers, customers or communities in which we operate, forms the basic premise of our Human Rights policy.\*

We ensure that we provide equal opportunities of employment to all the eligible applicants to our company. We also ensure that there is no discrimination on the basis of race, caste, religion, marital status, gender, sexual orientation, age, ethnic origin, nationality or any other category protected by law. Our policy on Human Rights explicitly enumerates the guidelines the Company follows in its business processes.

We actively monitor compliance and adherence to the applicable corporate International Labour Organization's declaration on Fundamental Rights and Principles at Work, as well as the International Bill of Human Rights.

As part of our employee Code of Conduct, certain basic principles

guarding Human Rights are also enshrined. As part of our induction programmes for new employees and other refresher trainings, we aim at raising awareness on Human Rights among the employees. We also promote awareness on human rights among our value chain partners.

Being a signatory to the UNGC, all of our significant investment agreements such as services order for manpower supply and EPC contracts contains human right clauses respecting human rights by appropriate measures to avoid child labour, forced labour, minimum wage and all the applicable regulations.

We have addressed the International Labour Organization's eight fundamental conventions through our employee and supplier Code of Conduct, policies and vendor evaluation criteria. This ensures there is no significant risk related to right to freedom of association and collective bargaining, child labour, and forced or compulsory labour in the areas of our operations and supply chain.



Operations that have been subject to human rights reviews or impact assessments = **100%**

Human Rights Training

Number of hours **580**

Percentage of employees trained **10.38%**



## • Rights of indigenous people

We comply with all the applicable regulations for Rehabilitation & Resettlement (R&R) in the respective states. There were no cases of infringement of rights of indigenous community groups across all our locations. We did not have any significant negative impact on local communities at any of our locations. There were no cases of physical or economic displacement of local people at the operations covered within the boundary of this Report.

We have not identified any of our operations or suppliers where employee rights to exercise freedom of association or collective bargaining and child labour requirements may have been violated or is at significant risk. All (100%) of our security personnel, including those supplied by third party, are trained in human rights policies and identification and prevention of child labour.

## Diversity

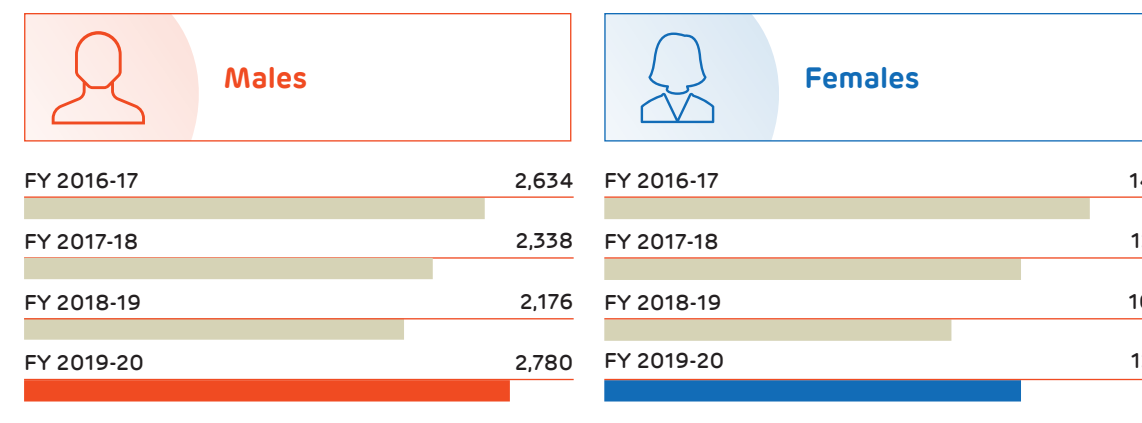
At APL, diversity of employees is encouraged at all levels of the organization. This is important to attract talent from different backgrounds, with different viewpoints and skills. This workforce diversity is taken care of at different levels of the organization. The applicable Corporate Governance standards are followed at the Board level, systematic efforts are undertaken within the organization to ensure starting from recruitment to training, retention and growth, and diversity is encouraged.

We encourage diversity of our workforce not only based on gender, but also on the basis of ethnicity and social or cultural backgrounds, age and experience.

For ensuring women's safety at our workplace, we have developed mandatory Prevention of Sexual Harassment (POSH) training programmes for all our employees.

## • Diversity in Workforce

Gender Profile of the Workforce (Permanent)



Contractual Employees

**7,815**  
FY 2019-20

**6,364**  
FY 2018-19



**Mr. Naresh Goel**  
Station Head - APJL

With a larger ambition of greater good and meeting the energy requirements of our neighbouring country Bangladesh, the project at APJL is adopting the best practices for sustainable power generation from the word go. For unhampered project execution and creating long-term solutions for the surrounding communities, at APJL, the highest standards of environment management and social impact mitigation along with social value creation are being taken care of.



GRI 406-1

Regardless of gender, and all other parameters being equal, female employees are paid the same as men across different employee categories. The ratio of entry-level wage offered to all employees is 1:1, without discrimination based on any criteria. The wages for all employees, including contractors, are also above the minimum wage as per the respective state laws. All employees gradually grow through a fair evaluation and promotion program. Zero cases of discrimination were reported in the current reporting year.

#### • Age Profile of the Workforce

|  | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|--|------------|------------|------------|------------|
| Total employees of age <30 years           | 517        | 530        | 760        | 1,023      |
| Total employees of age between 30-50 years | 2,062      | 1,504      | 1,445      | 1,462      |
| Total employees of age >50 years           | 214        | 146        | 141        | 163        |

#### • Category-wise job

| Employee Category                                | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|--|------------|------------|------------|------------|
| Senior Management                                | 127        | 100        | 97         | 105        |
| Middle Management                                | 547        | 396        | 405        | 419        |
| Junior Management (including Trainees)           | 1,370      | 999        | 1,116      | 1,317      |
| Supervisory                                      | 745        | 685        | 728        | 790        |
| Contractual (Full-time Appointee and Consultant) | 3          | 6          | 4          | 17         |

#### • New joinees attrition

| Employee category | Left jobs |        |
|-------------------|-----------|--------|
|                   | Male      | Female |
| Senior Management | 0         | 0      |
| Middle Management | 2         | 0      |
| Junior Management | 10        | 0      |
| Supervisory       | 2         | 0      |
| Contractual       | 1         | 0      |

There were a total of 530 new recruits at APL, compared to 128 in previous year. Of these, 15 left the organization in the same year. The attrition rate declined to 4% in FY 2019-20, compared to 6.45% in FY 2018-19 across all the sites.

### Training and Development

Preparing our workforce for transition in the power sector is one of the key objectives of our learning and development programs. Different training programmes are designed for employees at different levels in the organization. A plethora of technical and behavioural training programmes are designed for executives at the organization. Several managerial and functional training programmes are also developed for the mid-senior level to map their growth path.

All behavioural training needs are based on the Adani Behavioural Competency Framework, with three main competencies and eight sub-competencies identified. During FY2019-20, the focus has been on two of these sub-competencies. Based on the identified sub-competencies, two mandatory programmes and one elective programme is offered to all the employees. Along with these, we have provided enough space for selecting five programmes which are completed through our e-learning platform.

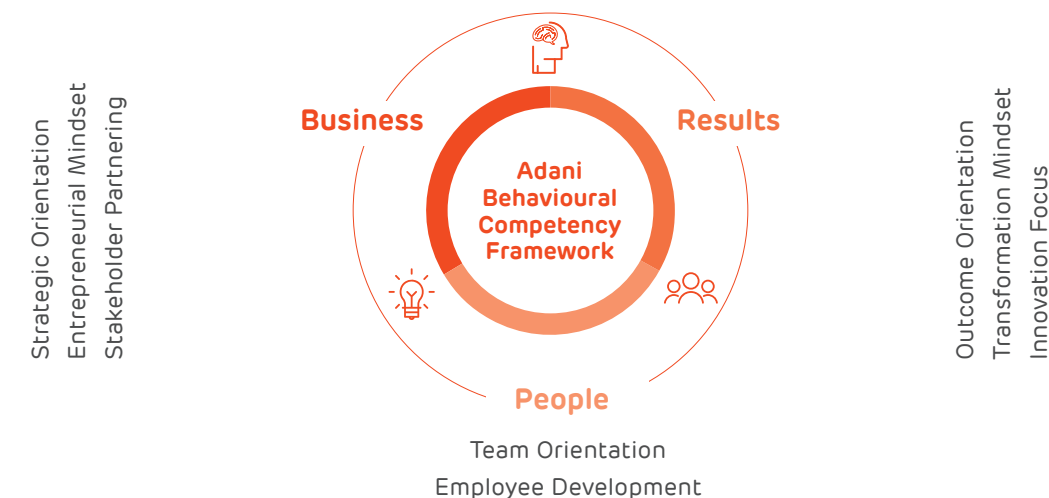


GRI 404-2

Apart from the competency framework, we also encourage our young talent to pursue skill upgradation courses or enrol for higher education.

To enable our senior leadership sharpen their skills further, we have initiated the Takshashila programme in collaboration with the Indian School of Business (ISB), Hyderabad. Nine of our employees have enrolled for this programme during the year and have attended six days of classes per quarter.

### Adani Behavioural Competency Framework



#### Behavioural Training Person-days

In FY 2019-20, Adani Power Limited, along with its subsidiaries, achieved 3.02 Behavioural Training person-days per employee against the targeted 2.5 person-days.

#### Technical Training Person-days

Adani Power Training and Research Institute carries out technical trainings. In FY 2019-20, it imparted 74,510 training man-hours to over 2,814 employees.



GRI 401-2



GRI 401-2



GRI 404-1



GRI 404-2



GRI 404-3

### Average behavioural and technical training hours per employee

| Employee Category   | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
|---|------------|------------|------------|------------|
| Average hours of training (Technical and Behavioural)                     | 48.2       | 53.9       | 50.7       | 54.8       |
| Senior management average training (Technical and Behavioural) hours      | 27.4       | 27.9       | 41.8       | 51.6       |
| Middle management average training (Technical and Behavioural) hours      | 47.9       | 52.1       | 55.6       | 66.1       |
| Junior management average training (Technical and Behavioural) hours      | 54.2       | 54.8       | 58.1       | 58.6       |
| Supervisory management average training (Technical and Behavioural) hours | 40.7       | 57.9       | 44.7       | 43.1       |





GRI 403-3

Employee Well-being and Retention

At APL, the overall well-being of employees is closely related to the work-life balance opportunities provided to them. It also depends on the tangible and intangible support they get from the organization to pursue personal and professional goals.

As a modern and dynamic workplace, we provide several flexible solutions, including smart working and remote working solutions, whenever possible.

Benefits provided to employees

| Benefits       | On Role | Contractual  |
|----------------|---------|--|
| Parental leave | Yes     | No   |
| Mediclaime     | Yes     | Workman Compensatory policy in place                                 |
| Insurance      | Yes     | ESI  |
| Transportation | Yes     | Through Agency (Within specified perimeter through service provider) |
| Housing loan   | Yes     | No   |



GRI 401-3

Parental Leave

Entitled



Availed



Returned after availing leave



Returned and employed till next 12 months



GRI 402-1

We also provide a notice period of minimum four weeks to all our employees before any major operational change is implemented. At our townships, we ensure that our employees and their families are able to enjoy all the amenities required for health, education, entertainment and social well-being.

We comprehend deeply the need to have proper healthcare facilities at our plants since they are situated away from the metropolitan cities. Our plants are equipped with an occupational health centre, ambulance facility with life-support systems, qualified doctors and paramedical staff. We have partnered with reputed service providers to conduct pre-employment and periodic medical examinations for our workforce. A mobile-based application Emcare has been established. This enables our employees to access their health records digitally.

The health centres organise various camps and counselling sessions for the employees and their families to make them aware of the benefits of good health and to address specific health-related issues. Some of these programmes cover topics such as Diabetes, Arthritis, Yoga Therapy, Naturopathy, and Vitamin Deficiency, among others.

All our employees and their immediate families are covered under a medical insurance policy, which is also extended to the employees' parents. The employees undergo pre-employment medical check-up before joining the organization. Also, during their tenure, the employees below the age of 45 undergo medical check-ups once in two years. On the other hand, employees above the age of 45 years undergo medical check-ups once a year.

We also organise annual cricket tournaments across all our facilities, encouraging the practice of playing table tennis, basketball, volley ball, badminton, chess, carrom, and other games. These games act as a medium for employees with diverse roles to collaborate and interact with each other, thus helping build the teamspirit.

We also encourage employee participation in various cultural programmes and CSR drives, encouraging a sense of belonging among the employees. These initiatives help in personal growth of our employees and ensure the creation of long-term bonds with the organization.

Safeguards for COVID-19 pandemic

- Awareness sessions are conducted for the employees
- Do's and Don'ts have been displayed at all strategic locations on print collaterals and digital platforms
- Employees' temperature is checked on a daily basis through non-contact type of thermometers
- 'Aarogya-Setu', a mobile app developed by the Government of India, is installed in the mobile devices of all employees, thereby helping them check the status of COVID-19 on a daily basis
- Social distancing is practiced at all our workplaces, with flexible work hours. Some employees are allowed to work from home, based on their nature of work.
- Sanitisers are being kept at all the important locations
- Use of masks has been made mandatory for everyone
- Immunity booster medicines are served to all the employees free of cost

Nurturing the future workforce

We believe in developing in-house talent, and hence, we lay emphasis on talent development through various learning initiatives and identifying the competency gaps.

We also hire trainees from India's leading engineering colleges and National Power Technology Institute. We run a specific induction training program called 'Campus to Corporate', which is a month-long programme covering various aspects of power plant operations. During this programme, trainees are exposed to theoretical concepts and are imparted insights on subject matter from power plant experts, knowledge of all core and service functions and their role in the organization.

Besides theoretical concepts, trainees also learn from practical exposure and plant visits. This helps in learning all the concepts and their application in the plants, thereby making them conversant with technology and equipment. Along with technical training, behavioural training is also imparted related to workplace communication, teamwork, positive attitude and accountability.

The trainees, at the end of their induction, are deployed in different departments and allotted mentors. These mentors are entrusted with the responsibility to develop the respective trainees and make them aware of the organization's culture and values. These trainees eventually become the Company's brand ambassadors, and share their experiences with the juniors.

Constant suggestions on career development and means to improve performance enable our workforce to perform with greater efficiency. During the reporting year, 91.5% of the employees were eligible for performance appraisal, of which the process was completed for 100%.

### Employee Engagement

We carried out a detailed employee engagement survey with a third party – the Gallup Survey. The survey results have shown interesting aspects of our employees' perception and motivation levels. The bi-annual survey, Gallup's Q12, assesses the engagement level of all the

employees in an effective way. The methodology is based on twelve questions designed around the below key questions:

- What do I get?
- What do I give?
- Do I belong?
- How can we grow?

The scores achieved are then compared with Gallup's database scores in India and globally.

#### Employee engagement score

A total of 93% of the employees responded to the survey, which will be done once in two years. For Adani Power Limited, the Grand Mean Score stood at 3.87/5, representing a higher level of engagement with the Company.

### Management workforce interactions

**DON'T LET THE CLOUDS OF DOUBT DISCOURAGE YOU  
ALL THE INNOVATIONS  
WERE ONCE JUST AN IDEA**

**OPERATIONAL EFFICIENCY  
IDEA CHALLENGE  
OPEN NOW!**

Follow These Steps To Participate

1. Logon to Maadhyam Portal
2. Go to Crowd Sourcing Page
3. Submit your Ideas with all details

## Response to Covid-19 Pandemic

The company's Risk Management Committee identified risk of Covid-19 and its potential impacts early and made necessary arrangements for the unhindered continuity of operations. This required formation of Covid-19 Task Force at each plant and the Head Office, arrangements for temperature screening of employees and contractors, hand sanitizations, advisory and provision of masks, social distancing, quarantine rules and arrangements for travelers and work from home schedule etc. Continuous communication to employees, contract workers through the emails, posters and banners, standing instructions helped create good awareness and ensured cooperation from all involved.

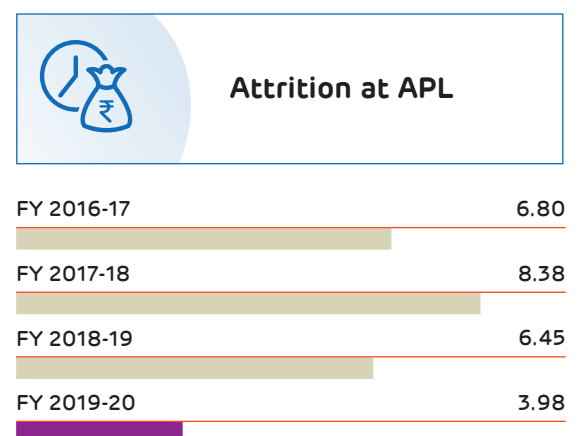
During the lockdown, special arrangements were made for the logistics of manpower, raw materials and in few cases, stay arrangements of employees was made on the sites. Similarly, for the smooth functioning of some suppliers and manpower contractors / agencies, advance payments were made for retaining the workers, where essential. Beyond the operations, all the plants in their capacity, also helped nearby communities to cope with the pandemic by distribution of masks, sanitisers and food packets.

During the COVID-19 lockdown, the Company stood by all its commitments, as a matter of duty to the nation, and ensured maximum availability of its capacity to generate power, so that the supply of power to the consumers continues uninterrupted. Further, the company has included pandemics in the Business Continuity Plans and made SOPs for ensuring interrupted operations in case of such events in future.

There is no unionized workforce, and hence, there are no collective bargaining agreements. However, there are multiple ways through which we ensure management and workforce interactions.

There are specific schemes for reaching out to the employees at the operation sites. The HR personnel visit shop-floors at regular intervals and listen to employees' grievances pertaining to provident funds, mediclaim, and attendance records, among others. Efforts are taken to resolve every issue within 48 hours.

During townhall meetings, the senior management at every plant location addresses all the employees collectively. These meetings encourage employee suggestions, queries, best-practice sharing and ideation. Some of these issues are addressed at the meetings, and for others, follow-up actions are undertaken based on the requirement.





# Occupational Health & Safety



GRI 403-1

People's safety is ensured through several levels of checks and balances throughout the organization, policies and management systems, training and awareness raising sessions. These systematically bring about a behavioural change in our workforce.



GRI 403-2

Our health and safety priorities are clearly articulated in our EHS Policy. With the overarching objective of 'Zero harm to life', all our operations are certified with the OHSAS 18001 or ISO 45001 standard.



GRI 403-3



GRI 403-4



## Safety trainings provided to the employees



Gas Cutting Safety



Portable Electrical Tools Safety



Welding Safety



Confined Space Safety



Chemical Safety



Guarding Safety



Fire Fighting Equipment



Traffic Safety



Electrical Equipment Safety



Work at Height Safety

We give utmost importance to safety. We are committed to providing a healthy and safe work environment for employees, contractors, and all the people engaged directly or indirectly with our workplace. The process of HIRA, job safety analysis, and the hierarchy of control is covered under our safety management system, as per ISO 45001:2018 standard. Under the safety management system, HIRA and job safety analysis is conducted to identify and eliminate potential risks involved in the working environment.

Moreover, activities carried out on a day-to-day basis are considered under routine activity, for which HIRA is reviewed every three years. HIRA and job safety analysis is conducted when there is a change in operating procedure, change in process and expansion work, occurrence of safety incidents, non-routine activity and any observations in HIRA made by internal and external auditors.

The effectiveness of HIRA and Job Safety Analysis is ensured by engaging cross-functional teams. It also includes the involvement of workers engaged in the activity, which eliminate the obstacles of effective implementation of the same.

We have set up a robust Incident Investigation process under the Safety Management System to investigate any safety-related incident. Any such incident will be followed by an immediate incident investigation carried out by a cross-functional team. These teams adopt techniques such as interviewing, incident site evaluation, and root cause analysis to identify the root cause and propose suitable corrective actions.

Encouraging a safe and healthy workplace is paramount to our business. We have a proactive approach towards capturing work-related hazards and hazardous situations such as routine Gemba walk and scheduled safety observation sessions. We also encourage our direct and indirect works to report any work-related hazard, hazardous situation, and concerns through reporting managers, suggestion boxes or workers representative in safety committees. We ensure prevention against retaliation towards works, rights to workers to refuse or stop unsafe or unhealthy work through our Whistle Blower policy, Human Rights policy, and grievance handling mechanism.

As a part of ISO 14001 and ISO 45001, a plant specific disaster management plan is available at all the operating locations.

## Project Chetna

### A safety culture transformation journey

We have set forth on the safety cultural transformation journey titled 'Project Chetna', in consultation with M/s DuPont, a pioneer organization in the field of safety management. Proper identification and a thorough assessment of prevalent practices precedes the implementation of further improvement techniques. Hence, Phase-I of 'Project Chetna' comprized an 'as-is-analysis' and quick-win opportunity identification through DuPont's dynamic assessment.

With the implementation of this project, the responsibility for health and safety issues become firmly established as an integral part of the line management function. All levels of line management possess a much greater knowledge of how to develop and implement high quality safety management systems.

Phase-II of the project is more focused on systematic deployment of Safety Interaction, Incident Management, Contractor Safety Management, Process Safety Management and High Risk Activities. It involves developing a governance structure that integrates business processes to include safety risk management.

After the completion of both the phases, we are driving our own initiatives for building a culture of safety and bring about behavioural change. These initiatives include a one-on-one interaction of shop-floor workers with our senior management. We have developed a comprehensive process for incident management and a detailed Contract Safety Management. This includes interaction of cross-functional teams. Contract awards are based on due diligence of safety standards, discussion on safety mandates, compliance monitoring and a detailed contract closure audit.

The key initiatives undertaken during FY2019-20 include:

- Life Saving Safety Rules training and undertaking covering all our employees
- 100% implementation of Gensuite, an online Safety Management Platform
- Initiatives for Felt Leadership undertaken through message from CEO, Steering Committee Meeting and location-wise Town Hall meets
- Extension of Safety Interaction (SI), Safety Risk Field Audit (SRFA) and use of Gensuite Training extended for business partner employees



**Rituraj Mehta**  
Head Safety

“Occupational Health & Safety is about collective, conscious and concerted efforts of bringing in behavioural change, technical upgradation and designed interventions that make our operations safer. 'Project Chetna' (Chetna is a hindi word for Consciousness), now in its third phase, has been an effective means of driving this organization-wide transformation of safety practices. While adhering to internationally known standards like ISO 45001, we are leaving no stone unturned in achieving the strategic objective of 'Zero Harm'.

- Quarterly Meetings with business partners' CMD to review safety performance
- 381 safety improvement initiatives were undertaken ensuring replications
- Compilation of 100 global incidences in power sector for sharing learnings and tracking
- Three special sessions undertaken on safety contact
- More than 70 Safety SOP standardizations carried out
- First-aid training carried out, covering 100% of the employees
- An SOP for COVID-19 developed and reviewed by COO

#### Key milestones achieved by Project Chetna (since inception):

1. More than 10 safety standards developed and implemented
2. More than 15 safety procedures deployed and implemented
3. More than 100 Train the Trainer developed for various safety standards
4. Apex and APSSC Meetings conducted
5. More than 47,000 Safety Interactions carried out
6. More than 11,500 SRFA Audits carried out
7. More than 2,500 near-misses reported and learnings shared
8. More than 150 Corporate Subcommittee Meetings carried out



### Process safety and technical upgradations

As part of the safety initiatives, we have developed a safety park at the Mundra facility, demonstrating various mechanical upgradations undertaken for ensuring workers' safety:

- Gas cutting safety
- Portable electrical tools safety
- Welding safety
- Confined space safety
- Chemical safety
- Guarding safety
- Fire-fighting equipment
- Traffic safety
- Electrical equipment safety
- Work at height safety

### Inculcating cultural change in safety

For positive reinforcement of safety practices among our people, we have put in place a Reward & Recognition system. We also encourage a culture of healthy competition on safety performance among the operational units. The culture of safety can be built only on the pillars of good communication, openness and trust. There are multiple cross-functional teams that include workers and managers. The Site Apex Committee on Safety meets at regular intervals to share their experiences and learnings, document the findings, review investigation reports, as well as support and facilitate line management for implementing better practices.



GRI 403-4

### Training and awareness building on safety

Regular training programmes on safety are carried out for our permanent and contractual employees. Safety instructions and other communication for safety starts before the new employees join the organization and before onboarding any contract agency. There are multiple and extensive training programmes undertaken for trainers as well.

### Safety Performance in FY 2019-20

|                                      | Contractual Workforce |            |            |            |            |
|--------------------------------------|-----------------------|------------|------------|------------|------------|
|                                      | UoM                   | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
| Injuries                             | No.                   | 4          | 3          | 2          | 9          |
| Lost time injury rate                | -                     | 0.05       | 0.03       | 0.04       | 0.17       |
| Lost days                            | No.                   | 144        | 262        | 115        | 2,254      |
| Lost days (Including fatalities)     |                       | 6,144      | 262        | 12,115     | 50,254     |
| Lost day rate                        |                       | 1.38       | 2.99       | 1.18       | 21.99      |
| Lost day rate (Including fatalities) |                       | 58.75      | 2.99       | 124.64     | 490.17     |
| Million hours worked                 |                       | 20.91      | 17.53      | 19.44      | 20.51      |
| Fatalities                           | No.                   | 1          | 0          | 2          | 8          |

|                                      | Permanent Employees |            |            |            |            |
|--------------------------------------|---------------------|------------|------------|------------|------------|
|                                      | UoM                 | FY 2019-20 | FY 2018-19 | FY 2017-18 | FY 2016-17 |
| Injuries                             | No.                 | 0          | 0          | 2          | 2          |
| Lost time injury rate                | -                   | 0          | 0          | 0.08       | 0.07       |
| Lost days                            |                     | 0          | 0          | 49         | 127        |
| Lost days (Including fatalities)     |                     | 0          | 0          | 49         | 127        |
| Lost day rate                        |                     | 0          | 0          | 1.90       | 4.54       |
| Lost day rate (Including fatalities) |                     | 0          | 0          | 1.90       | 4.54       |
| Million hours worked                 |                     | 5.38       | 5.04       | 5.16       | 5.59       |
| Fatalities                           | No.                 | 0          | 0          | 0          | 0          |

### Safety Training

| Safety Training – Contractual Employees<br>(UoM - hours) |         | Safety Training – Permanent Employees<br>(UoM - hours) |        |
|--|---------|--|--------|
| FY 2016-17   | 73,427  | FY 2016-17   | 32,183 |
| FY 2017-18   | 94,200  | FY 2017-18   | 33,904 |
| FY 2018-19   | 116,640 | FY 2018-19   | 39,328 |
| FY 2019-20   | 160,182 | FY 2019-20   | 34,554 |

Please note: Safety performance data is representative of 100% of our permanent and contractual employees

### Recognized by coveted awards

#### British Safety Council 'Five-star' Award and 'Sword of Honour'

Adani Power Rajasthan, Kawai has been awarded the British Safety Council (BSC) "Five Star" rating. This is the highest category for any safety award. The operations there have also been recognized with the 'Sword of Honour-2019' from BSC.

#### FICCI Safety System Excellence Award

Udupi Power Corporation (UPCL), Udupi won the Platinum Prize, while Adani Power Maharashtra (APML), Tiroda won the Certificate of Appreciation under the 8th FICCI Safety Systems Excellence Awards in the Power category of the Manufacturing Sector.



# Responsible Supply Chain Management



GRI 308-1

Inclusive growth and sustainable development form the core of our corporate responsibility philosophy. At APL, we undertake all measures to ensure that our value chain partners uphold the highest standards of social and environmental responsibility.

APL has a systematic vendor selection process, knowledge-sharing initiatives and constant interactions with our vendor base for performance review and feedback on quality.



GRI 308-2

## Engagement with Vendors

Our detailed vendor selection process includes certain basic screening criteria. Among the other quality, safety and pricing criteria, we assess the environmental and social responsibilities fulfilled by our vendors.

We encourage that our vendors follow recognized management systems and standards such as the ISO 14001 and OHSAS 18001. Moreover, as a part of our Human Rights Policy, we ensure that our vendor partners protect and upkeep the human rights of their employees.

Also, as part of our efforts to bring about economic development and create employment opportunities locally, we encourage vendor selection from domestic market.



GRI 414-2

GRI 308-2/  
414-1

In FY 2019-20, for non-fuel supplier, we had a base of 5847 vendors (based on last 3 year transactions)\*\* . Nearly 98.2% of these Vendors are local (i.e. Domestic). Out of total service and material contract value for FY 19-20, 94.8% of the value was awarded to local (i.e. Domestic) vendors.

*\*\* except – fuel procurement vendors, which include traders and logistics partners*

As a part of the vendor registration process, all the suppliers are assessed on various parameters including quality, safety, environment and social impact at the time of onboarding. To leverage synergy across the

group companies, we have developed a common vendor base across all the Group companies.

To build a sustainable business relationship with our vendors, we measure the performance of the vendor and provide regular and transparent feedback for their improvement and development.

New suppliers that were screened using environmental and social criteria = 100% (for critical suppliers)

Based on our vendor assessments, there were no negative environmental and social impacts identified for critical suppliers.

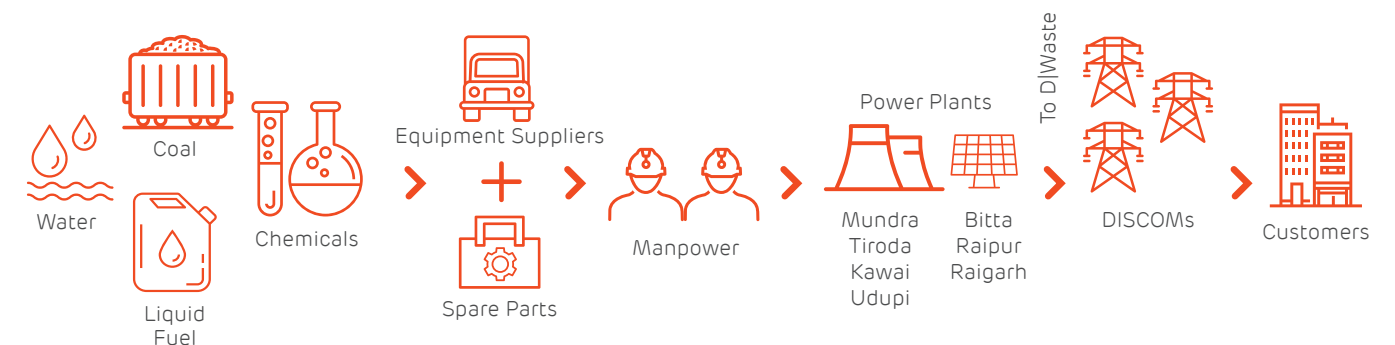
We consider our vendors as business partners and extend our support for their growth and sustainability. We have shown our commitment towards well being of Employees of Contractors who are working at our site during challenging COVID-19 period. We have made additional payment for 6 months (from 25/03/2020 to 30/09/2020) towards those Contract workers who were advised not to attend duty for maintaining minimum possible workforce at plant or who were not able to resume duty due to leave, sickness or stuck at other places because of lockdown. Even this practice is continue beyond 30.09.2020 at our sites on case to case basis for maintaining workplace hygiene and safety of contractor workman.

## Customer satisfaction

Adani Power has adopted ISO Management System (IMS) to improve its overall performance and consistently provide products/services that meet customer and applicable statutory and regulatory requirements. Under this system, organisation is required to effectively communicate with its customers regarding its products/services, handling enquiries and obtaining customer feedback relating to its products/services. During 2019-20, there were no major unresolved grievances from the customers.

## Our value chain

Our businesses benefit from the competitiveness and scale of our suppliers. The value integration of coal, port and power together provide the most desired synergy. This synergy helps us in quick turnaround of our projects and delivers the best value to all our stakeholders.



During this reporting year, there have been two acquired operations – REL and REGL. Due to these acquisitions, our supply chain has expanded and their existing suppliers have become a part of our vendor base.

Our systematic vendor selection process, knowledge-sharing initiatives and constant interactions with our vendor-base for performance review and feedback on quality form the basis of our supply chain initiatives.

## Stages of our procurement practice

### • Step 1: Vendor identification and on-boarding

The vendor on-boarding process broadly covers four aspects: identification, pre-screening, pre-qualification and approval. Successful vendors during the tendering process are transferred into the Vendor Master list. A vendor code is generated for new vendors, following which the Category Lead begins formulating the contract.

### • Step 2: Vendor performance management

Performance of Vendors who delivers goods are evaluated based on following criteria:

1. Quality of product
2. Delivery adherence
3. Price competitiveness

Performance of Vendors who delivers services at our site are evaluated based on following criteria:

1. Quality of services
2. Delivery adherence and site management system
3. Price competitiveness
4. Health, Safety and Environment (HSE) aspects

Since our inception, we have worked persistently to create a mechanism to ensure effective utilization of the ash which is a non-hazardous solid waste arising from coal-based power generation being generated at our power plants based on site-specific strategies. Through our various initiatives such as developing wagon loading infrastructure, installing HCSD systems, Bagging & Classification systems, development of M-sand unit and promoting entrepreneurs involved in ash-based product development, we have continuously strived to develop innovative avenues and maximize the utilization of ash sustainably as per the regulatory guidelines.

## Approach to suppliers - ESG aspects

Plant-wise fuel supply information is available on the Company's website – Investor Presentation.

## Customer health and safety

As we are in the business of thermal power generation, where our customers are the distribution companies, we do not have any products or services that pose health and safety risks to the customer. However, as part of our CSR programmes, we work with electricians and workmen on various safety practices with regard to handling of electrical equipment.



GRI 416-1



GRI 416-2



GRI 417-1



GRI 417-2



GRI 417-3



**Mr. Upendra Varmora**  
Vice President- Energy  
Contracts Management Group

“As a responsible corporate citizen, we believe in co-creating value along with our suppliers. To streamline our vendor selection, management and retention processes, we have categorized our vendors based on criticality. We have also developed a digital platform for vendor management. With these initiatives, we want to ensure that we build seamless transactions with vendor partners and create lasting relationships.”

# Community Engagement and Development



GRI 413-1



GRI 413-2



GRI 413-3



GRI 203-1

As a responsible corporate citizen, we have always adopted a model of inclusive growth and have been actively involved in the upliftment of the marginalized communities that we operate in through the Adani Foundation. The Foundation has an illustrious body of work spanning over two decades. The expanse of the Foundation's activities is not limited to the areas where the Group's operations are prevalent, but also covers other geographies that require developmental intervention. Though the Company did not make any profit and does not qualify for mandatory CSR spend requirement,

₹ 233.5 million has been spent for CSR activities, which includes ₹ 85.8 million spent by Company and ₹ 147.7 million spent by Adani Foundation at the operating location of APL.

The Foundation specifically focuses on women empowerment, children, differently-abled people, socially marginalized communities, tribal communities, fisher folk and farmers. It enables this by facilitating quality education, enabling the youth with income-generating skills, promoting a healthy society, and supporting infrastructure development.

**Beneficiaries touched annually**  
**821,624**

**Villages covered**  
**2,315**

**Number of states covered**  
**18**

With the ever-transforming landscape of conventional thermal power, stakeholder engagement and constant monitoring of their concerns is the key to create timely responses specific to their concerns. Our engagement with communities begins from the project planning stage, and continues when the plants become operational. We ensure that the CSR

programmes being designed become self-sustainable.

For all our operations, we engage with the local communities from the project stage. We carry out detailed environmental and social impact assessment, and develop programmes that help address the identified issues.

## Our approach to creating value for communities



### Education

- Key programmes: Gyanodaya, Navodaya Coaching Centre, Super-100 and Super-200 programme, scholarships



### Health

- Mobile Healthcare Units (MHUs), Health Camps
- 1,63, 635 treatments provided through 9 MHUs



### Sustainable Livelihood Development

- Modern and Organic methods in agriculture
- Livestock Development
- Community Infrastructure Development



### Rural Infrastructure and Water Conservation

- Water conservation projects
- Disaster Relief Work
- 4,588 families benefited from water conservation



GRI 413-2

Our projects may entail land use changes that may impact the lives of people in the vicinity of the operations, and also at operational stage. However, there may be resources like water which is shared with communities in the same watershed. There are a plethora of CSR programmes aimed at creating positive impacts on the communities in the nearby areas.

We believe that we too derive environmental, social and business value from each of these interventions. On the other hand, maintaining a relationship based on trust and harmonious co-existence are the direct results of our community programmes. There are multiple ways in which our business derives indirect value. This can be in the form of creating future talent pool through skill development programmes or improving the economy in the region we serve.

Moreover, there are long-term positive impacts of programmes meant at water conservation which help in the overall watershed management and reduce water stress in the regions we operate in. Several other programmes on infrastructure, health and cultural heritage preservation are helpful in the overall development of the region where we operate in.

Our approach to CSR programmes is two-pronged. There are a set of key programmes run across all our locations. Designed by the Adani Foundation, these programmes address the key priority areas identified by the business:

- Primary Education
- Community Health
- Sustainable Livelihood Development
- Rural Infrastructure Development



**Mr. Anand Rao**  
Head, Human Resources

“'Growth with Goodness' is a philosophy that we live by. Our people have thoroughly imbibed this philosophy in the way they work and perform. Providing our people with a world-class work environment, charting their growth path, imparting learning and development opportunities and ensuring their health, safety and well-being form the key foundations of our Human Resource practices. Our Competency Framework help us build relevant and required technical and functional competencies across the organization. We ensure equal opportunities for all and encourage diversity in our workforce, irrespective of gender, caste, religion, ethnicity and nationality. Our Employee Code of Conduct defines the principles of human rights and ethical conduct that we abide by. We ensure that all our employees and stakeholders have an awareness of this Code.





GRI 203-2



GRI 413-1



GRI 413-2



## Education

The main philosophy behind Adani Foundation's educational initiatives is to make quality education accessible and affordable to the young minds. To reach out to the most marginalized population, the Foundation runs cost-free and subsidized schools across India. Several smart learning programmes and projects to adopt government schools are being implemented in remote areas. The Foundation

aids Anganwadis and Balwadis by creating a fun-filled environment for kids at an early age. It also provides timely infrastructural support to existing educational facilities and transportation support to college and school going children from the marginalized sections such as the tribal, fisher folk and low-income groups.

## Key Projects

### Aamchi Shala Adarsha Shala

Adani Foundation's 'Aamchi Shala Adarsha Shala' competition is a unique initiative in collaboration with the District Education department at the Tiroda location in Gondia district in Maharashtra, India. It aims to revive the government-run primary and secondary schools through a competition-based format. By ensuring that the participating schools fulfil 41 parameters under 11 heads on which the competition is judged, the foundation catalyses an on-ground impact.

With active involvement of teachers, SMC, Gram Panchayat members and the Foundation team, the overall education experience for government schools in Tiroda block in Maharashtra has improved remarkably.

## Outreach and Impact



There is a five-fold increase concerning the average number of students shifting from private to government schools. The average number of student participation in competitive examinations has increased by more than 75% compared to that in FY 2015-16.. Considering the impact, the Government of Maharashtra has decided to adopt the project in all the government schools in Gondia district.



## ज्ञानोदय गोड्डा

### Gyanodaya

This is a digital learning mission launched in July 2018 in the Godda district, Jharkhand, India in collaboration with the Adani Foundation, district administration of Godda and Eckovation Pvt. Ltd. Within the limited available resources in a school, Gyanodaya's digital learning platform provides an effective model to reach and impact both students and teachers alike. The use of Artificial Intelligence (AI) for the personalized feedback based on the learning outcomes has set this model apart from other digital learning programmes. The visually appealing, easy-to-grasp and retainable concepts covered in the digital study materials is regularly vetted.

## Outreach and Impact



There is a five-fold increase concerning the average number of students shifting from private to government schools. The average number of student participation in competitive examinations has increased by more than 75% compared to that in FY 2015-16. Considering the impact, the Government of Maharashtra has decided to adopt the project in all the government schools in Gondia district.

## Navodaya Coaching Centre

This is a unique experiment in school education within India. Its significance lies in the selection of talented rural children as the target group and the attempt to provide them with quality education comparable to the best residential school system. The NCC started in Maharashtra – three centres at Zila Panchayat Upper Primary School Birsai, Zila Panchayat Upper Primary School, Gumadhawada and Zila Panchayat High School and Junior College Kawalewada were already operational and are free of cost.

## Outreach and Impact



During the year, a total of 80 students from government schools benefited from these coaching centres.

Now in Kawai, Rajasthan, 97 students from 26 government schools have joined the classes and are taking lessons with interest to get admission in Jawahar Navodaya Vidyalayas.

Four Navodaya Centres are being run in the villages of Raikheda, Gaitara, Tarashiv and Chicholi in Raipur district, Chhattisgarh in which a total of 69 students are enrolled.



## Super-100 and Super-200 programme

Adani Foundation, in collaboration with district administration, provided residential coaching classes for conducive learning environment to the top 100 students of Godda district for the preparation of Jharkhand Board Exams held in March 2019.

## Outreach and Impact



This resulted in a marked improvement in the performance of the Super 100 boys and Super 100 girls. Out of 84 boys, 81.09% received 1st division, and 10.71% secured 2nd division. Similarly, out of 93 girls, 90.32% secured 1st division and 8.6% received 2nd division.

This outstanding performance of the Super 100 students and appreciation from district administration led to the origin of Super 200 Programme in November 2019. Its objective is to enable Super 200 boys and girls to succeed in 10th Board Exam with 1st division marks and secure bright careers.

## Scholarship Programmes

In order to encourage meritorious students to continue with their further studies, the Adani Foundation confers timely scholarships on them.

## Outreach and Impact



During this financial year, a total of 832 meritorious students, out of 946 applications received, met the criteria, residing around the Udipi plant (within the limits of 12 Gram Panchayats) were conferred the Adani Scholarships. These amounted to ₹ 23.00 lakh.



## Health

Bringing healthcare to the remotest of regions, Adani Foundation's key focus has been that of improving access to quality healthcare services for people belonging to weaker sections of the society. Our basic healthcare facilities were availed by community members in Kawai (Rajasthan), Tiroda (Maharashtra), Udupi (Karnataka), Raipur (Chhattisgarh) and Godda (Jharkhand) regions

of our Power businesses. Apart from this, Adani Aarogya Card, a tailor-made health insurance policy was provided to 2,341 families, covering 9,483 community members of Mudarangadi and Yellur region in Udupi, Karnataka. The card holders can avail cashless medical treatment amounting to ₹ 50,000 per family.



### Key Projects

#### Health Care Units (MHCU)

MHCUs are deployed by Adani Foundation in the aforementioned regions with the objective of providing basic healthcare facilities to villages in the vicinity. The facilities include diagnostics services, medicines, consultation and referrals by certified doctors at the doorstep of the community members.

In Raipur, Chhattisgarh, the MHCU doctor also visits schools in the area on a regular basis to educate children on health and personal hygiene. Health awareness about ailments such as Diarrhoea, Scabies, Typhoid and seasonal diseases, along with health check-ups were conducted every week.

### Outreach and Impact



During FY 2019-20, a total of 1,63,635 treatments were provided through nine MHCUs deployed across villages at these sites. As a result of this initiative, the patients save money on consultation with Adani Power Limited's Sustainable Livelihood Development. Adani Foundation's intervention to support sustainable livelihood generation is driven by the belief that a society made of empowered individuals with a decent standard of living leads to overall prosperity and development of the nation. The Foundation builds Social Capital by supporting initiatives towards preservation of traditional art and fees, medicines and travel costs, reducing the possibility of losing livelihood.

In Raipur, about 1,820 students of 23 schools received consultations, along with medicines.

### Health Camps

Adani Foundation regularly conducts various general and specialized medical camps in and around its operational locations for the benefit of local communities. At these camps, services of gynaecologists, orthopaedic surgeons, heart specialists, skin specialists, paediatricians, ophthalmologist and ENT surgeons are provided to the community members at no cost. Free of cost follow-up services are also made available and necessary discounts are negotiated in cases requiring surgery.

Four mega health camps were organized at Kunjed, Kawai, Phoolbaroda and Aton villages in Kawai, Rajasthan. With a team of 12 doctors and paramedical staff, Adani Foundation facilitated medical treatment by general physician, gynaecologist, paediatrician, ENT specialist, dentist and ophthalmologist.

### Outreach and Impact



A total of 2,767 villagers were diagnosed by these specialists. This year, 39 health camps were organized in 39 villages of Tiroda, in which 4,410 people consulted and provided medicines.

## Sustainable Livelihoods

Adani Foundation builds Social Capital by supporting initiatives towards the preservation of traditional art and fees, medicines and travel costs, reducing the possibility of losing livelihood. Specific programmes are designed for fishermen communities, farmers and cattle owners,

youth and women. Introducing alternative livelihood opportunities to marginalized sections of the society leads to additional income. For instance, the women self-help groups in Tiroda involved in mushroom cultivation, agarbatti (incense stick) making and lac bangle making.



### Key Projects

#### Modern and Organic Methods in Agriculture

With the objective of promoting organic farming and boosting yield using System of Rice Intensification (SRI) method, Adani Foundation, in cooperation with respective block agriculture departments, conducted various training programmes for farmers this year. They have been introduced to various innovative and cost-saving practices in farm cultivation, techniques that included low-water usage and less labour intensive organic method of growing crops.

Farmers are being encouraged to develop kitchen gardens to ensure that their nutrition and dietary needs are met. Adani Foundation also encouraged lac cultivation to help farmers with an alternate livelihood by distributing 15 packets of lac insects to 200 farmers each.

### Outreach and Impact



This year, the project has been successfully implemented in 20,191 acres of land by 10,000 farmers of Tiroda region in Maharashtra. The SRI method has also been introduced and four mega health camps were organized at Kunjed, Kawai, Phoolbaroda and Aton villages in Kawai, Rajasthan. With a team of 12 doctors and paramedical staff, Adani Foundation facilitated medical treatment by general physician, gynaecologist, paediatrician ENT specialist, dentist and ophthalmologist.

A total of 2,767 villagers were diagnosed by these specialists. This year, 39 health camps were organized in 39 villages of Tiroda, in which 4,410 people were consulted and provided medicines at Surguja area in Chhattisgarh and at Dhamra region in Odisha.

On an average, this method increased the average yield by 2.42 Qtl./acre giving an average benefit of ₹ 4,800/acre.

Moreover, 4,000 seed kits were distributed among farmers in 15 villages of Tiroda and nearly 13,000 fruit bearing saplings were distributed to 6,400 students of 77 government/aided schools in and around the Udupi power plant.



## Livestock Development

With the support of the Group companies, Adani Foundation initiated a Cattle Breed Improvement Programme (CBIP) in the villages of Kawai region in Baran district of Rajasthan and Tiroda region of Gondia district in Maharashtra. Taking into consideration the local needs of the cattle breeders and the availability of breedable cattle, four Integrated Livestock Development Centres (ILDCs) have been established – two in Kawai and two in Tiroda region.

A total of 2,336 Artificial Insemination (AI) procedures were conducted in the reporting period. Other supporting activities such as vaccination, deworming, infertility camps, castration, first aid and extension activities related to livestock development were carried out. These services were provided to the farmers at their doorstep with the help of locally trained para-vets.

With an objective to increase the awareness and motivate farmers, 10 animal treatment camps were conducted this year.

H.S. and B.Q. vaccine was administered to cattle with the support of the Department of Animal Husbandry.

## Outreach and Impact



A total of 2,684 animals were treated in the medical camps and free medicines were provided to cattle owners. As per the requirement, fodder seed and fertilisers were distributed to 368 farmers.

## Rural Infrastructure and Water Conservation

Quality infrastructure bears a direct influence on living standards and economic development in the rural areas. Access to resources, increase in the avenues for developing livelihoods, safe and clean sources of drinking water, and access to qualitative primary healthcare systems lead to better productivity, reduction in morbidity and adequate employment.

## Key Projects

### Rural Infrastructure

Need-based infrastructure support is given to villages in Tiroda, Godda, Kawai and Raipur, including construction and renovation of toilets, classrooms, libraries and laboratories in *Anganwadis*, schools and colleges. Construction and renovation of road connected to village, community halls and other public utility services are also facilitated by Adani Foundation.



## Water Conservation

Rooftop rainwater harvesting, pond deepening, recharging bore-wells are affordable, easily implementable and highly replicable techniques for collection and storage of rainwater at surface or in sub-surface aquifer, before it is lost as run-off. While building check dams in a developing country like India is indispensable, the above mentioned methods of water conservation and management help in reducing the overall cost and the demand of treated water. These solutions have yielded a sustainable increase in groundwater levels and availability of water for consumption as well as irrigation.

## Outreach and Impact



Adani Foundation began its water conservation activities in Tiroda in 2012. In this region, which is known as the rice bowl of India, low rainfall adversely affected paddy crop. The focus of water conservation activities here was to identify the irrigation system already existing (check dams/Malgajari tanks/percolation tanks/streams) rather than creating new infrastructure and also to create participatory irrigation management co-operative societies. The impact multiplied as water storage capacity under the initiative touched 10,71,520 CUM, benefiting 4,588 families, surrounding cattle and wildlife covering more than 11,494 acres of land.

In Godda, total deepening work of 68 ponds has been completed till date, increasing the water storage capacity by 494,713 CUM, across 3,061 acres benefiting 6,542 farmers.

In Udupi, five community RO plants were installed in the villages of Yellur, Mudarangadi, Tenka (R&R colony), Bada and Belapu. With a capacity of purifying 1,000 litres of water per hour and storage capacity of 5,000 litres of purified water per unit, this facility aimed to reduce water borne diseases in these regions. Villagers were also provided 12 litre water cans for carrying this potable drinking water – a total of 6,148 persons benefited from this initiative.

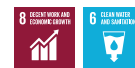
## Disaster Relief Work

Cyclone FANI caused large scale devastation in 14 districts in Odisha in 2019, Puri, Cuttack, Kendrapara and Jagatsinpur were severely affected. Community infrastructure was a matter of grave concern as the electricity structures were devastated and uprooted. Considering the severity of the destruction, Adani Foundation teams in Tiroda, with support from APML Employee Volunteers, worked towards restoration of electricity in Puri. The activities included erection of electric poles and stringing work; provision of GI metal sheet and required accessories, temporary housing facilities for affected communities.

During the Sangli floods in August, as heavy rain battered western Maharashtra, nearly 250 villages in Kolhapur and Sangli were flooded and cut off from the rest of the districts.

Adani Foundation provided medical aid, and facilitated bulb distribution, electrification of villages and public place sanitation. A total of 36 APML Disaster Relief teams and MHCU teams were appointed in Sangli for 10 days. A total of 360 person-days were spent by the 36 employees.

## Outreach and Impact



In Puri area, electricity was restored by employee volunteers.

At Sangli, interventions were made in more than 25 villages, impacting ~2,000 families and more than 5,000 lives.

## Other Projects

In addition to these priority areas, there are a plethora of initiatives undertaken based on the requirements of local communities and the findings of the frequent engagement.

Key projects across all locations include:

- Swachhagraha
- Saksham
- Suposhan
- Udaan

## Swachhagraha

Swachhagraha draws inspiration from the largest and most effective mass movement that our nation has seen – that of 'Satyagraha' – to give rise to a sustainable culture of cleanliness. It seeks to take the country's Swaccha Bharat Abhiyaan a step further by encouraging active participation of young citizens and creating youth leaders. It provides these leaders a platform to not only take action, but also inspire others in the society.

## Saksham

More than 1,500 women in the aspirational district of Godda, Jharkhand, have been trained in stitching and tailoring through the Adani Skill Development Centre. These women have come together under the umbrella of a self-help group (SHG) called Phoolo Jhano Saksham Aajeevika Sakhi Mandal (PJSASM).

Adani Foundation, with support from the district administration of Godda, has set up mega garment production hubs where women are involved in stitching various items such as school uniforms, bags and sweaters. These women have collectively earned over ₹ 1.86 crore in FY 2018-19 and FY 2019-20 through this initiative by stitching of over 305,578 pairs of School Uniforms.

The district administration has entrusted faith on the group for supply of sweaters for 1.50 lakh school students. A sum of ₹ 50 lakh was sanctioned for the sweater-making project which is taking place at the Sunderpahari Centre. Similarly, Adani Skill Development Centre runs another tailoring production centre with 15 advanced sewing machines at Raipur, Chhattisgarh. Here, a group of 15 women of Saheli Shashakt Silai Samoo and 10 female trainees are engaged in sewing various kinds of bags, pants, shirts and blouses. The group has earned ₹ 2.35 lakh between October 2019 and March 2020.

## SuPoshan

Adani Foundation's SuPoshan project is an initiative by Adani Wilmar, implemented by the Adani Foundation. It targets to alleviate malnutrition and anaemia among children in 0-5 years of age, adolescent girls, pregnant women, lactating mothers and women in the reproductive age. This way, it supports the Ministry of Women and Child Development's Poshan Abhiyaan. This is facilitated by a community-based model – a SuPoshan Sangini. This is a village health volunteer who plays a pivotal role in spreading awareness, referrals and promoting behavioural change among the target groups to achieve the project objectives.

Till date, 634 SuPoshan Sanginis have been working in 1,369 villages and municipal wards across the country and providing services to 324,064 households. Thus, Fortune SuPoshan has been able to bind the Adani Foundation's three core areas of work – namely education, health and sustainable livelihood development into one.

## Udaan

Since 2010, more than 3.48 lakh students/participants have had the opportunity to participate in Project Udaan. Here, students are given a chance to see and experience the operations of the Adani Group businesses, including Port, Power and Edible Oil refining facilities. These activities are supervised in five states across six locations at Mundra and Hazira (Gujarat), Kawai (Rajasthan), Tiroda (Maharashtra), Dhamra (Odisha) and Udupi (Karnataka). The exercise stimulates young minds to dream big and inspires them to become entrepreneurs, innovators and achievers of tomorrow.

There are no significant actual or potential negative impacts on local communities as a result of our operations.



# Governance Report

91 Corporate Ethics

.....  
Governance Model

92 Compliance Monitoring

93 Anti-Corruption

94 Enterprise Risk Management Framework

In our efforts to make Adani Power a more 'goodness'-driven organisation, we place the greatest importance on integrity, compliance and safety. We believe the culmination of these three pillars holds the key to long-term success.





Alignment with other voluntary disclosures

| GRI  | UNGC                               | SDG  |
|--|------------------------------------|--|
| <div> GRI 205:<br/>Anti-corruption 2016</div>              | Anti-corruption<br>Principle 10    | 16 – Peace, justice and strong institutions<br><br>17 – Partnerships for the Goals |
| <div> GRI 206:<br/>Anti-competitive Behavior 2016</div>    |                                    |  |
| <div> GRI 415:<br/>Public Policy 2016</div>                |                                    |  |
| <div> GRI 410:<br/>Security Practices 2016</div>           | Human Rights<br><br>Principle 1, 2 | 10 – Reduced inequalities  |
| <div> GRI 411:<br/>Rights of Indigenous Peoples 2016</div> |                                    |  |
| <div> GRI 412:<br/>Human Rights Assessment 2016</div>      |                                    |  |
| <div> GRI 413:<br/>Local Communities 2016</div>            |                                    |  |
| <div> GRI 414:<br/>Supplier Social Assessment 2016</div>   |                                    |  |

Managing Governance Priorities



Corporate ethics

- GRI 412-2
- GRI 206-1
- GRI 419-1
- GRI 205-2
- GRI 415-1
- GRI 102-15

Ethical business conduct is not compromised at APL. The key constituents of ethical business principles followed at APL are enshrined in the Employee Code of Conduct . The Code of Conduct clearly articulates how the Company stands committed to business ethics, the measures it takes to protect any person raising a genuine concern

related to violation of or non-adherence of its ethical principles and policies.  
We are committed to transparency, disclosure and reporting to promote ethical conduct of our business throughout the organization.



GRI 206-1



GRI 419-1

## Compliance Monitoring

The Board of Directors takes responsibility for the implementation of corporate governance practices with appropriate checks and balances. The Company complies with the necessary requirements of Corporate Governance under Clause 49 of the Listing Agreement with the Stock Exchanges. The Board reviews compliance with all the applicable laws to the Company as required under Regulation 17(3) of the SEBI Listing Regulations.

Moreover, the Company has established systems for internal control and audit. Some of the key features of the internal control mechanisms include:

- Adequate documentation of policies, guidelines, authorities and approval procedures such as Standard Operating Procedure (SOP) and Delegation of Authority (DOA) are in place for controlling important functions
- Monitoring of all laws, regulation and statutory compliances is being done through an internal online portal
- Audit Committee, comprising Independent Directors, regularly reviews the adequacy of internal controls and ensures compliance with Accounting Standards, among others
- A comprehensive Information Security Policy and continuous updating of IT systems

The business of power generation in India is a licensed one and the annual revenues are governed by contracts. Thus, competition doesn't affect revenues over the concession period once the project is awarded and service agreements are signed. Projects at the central level are predominantly awarded under Tariff Based Competitive Bidding and are open to all the eligible companies to participate. The process of the award is fair and transparent. Moreover, the Competition Commission of India (CCI) acts as a watch-dog in identifying and curbing any anti-competitive practices.

We are aware of our role as a significant player in India's power generation industry. Hence, we ensure that we are not involved in any sort of 'anti-competitive' behaviour, 'anti-trust' or monopoly, which may have legal implications. We do not have any legal actions or litigations against us regarding the same during the reporting period.

We have implemented Legatrix, an IT-enabled legal support service relating to legal and regulatory compliances. We are in line with all the regulatory compliance and endeavour to maintain the objective of zero non-compliance status.



GRI 205-2

## Anti-Corruption

APL intends to pursue its commitment to fight corruption in all its forms – whether direct or indirect. We consider corruption posing a significant risk to regulatory compliance and public image. Hence, as part of our enterprise-wide risk assessment, we constantly monitor any activity that may lead to corruption-related risks. Training of code of conduct is the part of this induction.

APL complies with the main relevant legislation and all the best corporate governance practices, as applicable. All our Board Members, senior executives and employees are made aware of the Code of Conduct (CoC). These members are also required to sign the CoC annually, as a part of the Annual Compliance Report.

| Policy  | Reference to Anti-Corruption Clause/s                               |
|---|---|
| Code of Conduct for Board of Directors and senior management of the Company <sup>13</sup> | • Payments or Gifts from other people                               |
| BRR – Policy <sup>14</sup> for the Principle 1  | • Provision for the periodic training of employees and stakeholders |
| Supplier Code of Conduct <sup>15</sup>  | • Business ethics and governance                                    |

Our vendor partners are also made aware of the Code before awarding of any contract to them.

Moreover, the Code of Conduct specifically focuses on the following areas, where there is a relatively higher probability of corruption.

We are vigilant of these areas with potential exposure to corruption, which includes:

- negotiation and execution of contracts with third parties
- participation in tenders;
- selection of vendor partners/consultants
- management of financial resources;
- gifting and hospitality;
- recruitment processes;
- and, incentives for top management.

Total number and nature of confirmed incidents of corruption:

# Zero

Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.

# Zero



GRI 415-1

During the reporting year, we did not make any political donations or contributions. As a policy, any political donation, irrespective of the amount, requires approval from the Board of Directors.

<sup>13</sup> Page 6; <https://www.adanipower.com/-/media/Project/Power/Investors/Corporate-Governance/Policies/02CodeofConduct.pdf>

<sup>14</sup> <https://www.adanipower.com/-/media/Project/Power/Investors/Corporate-Governance/Policies/APLBRRPolicies2.pdf>

<sup>15</sup> <https://www.adanipower.com/-/media/Project/Power/Investors/Corporate-Governance/Policies/APLBRRPolicies2.pdf>





GRI 102-15

### Enterprise Risk Management framework

At APL, we have a structured process to identify the potential threats and risks. The strategy to manage these risks and the mechanisms to monitor the strategy is also taken care of by the risk management process.



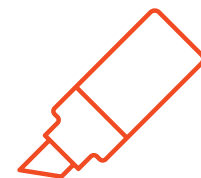
The risk management process is overseen by the Risk Management Committee at the Board level and at the business level, the business risk management committee. The Chief Risk Officer is responsible for overseeing the entire process and there are different committees for different sites and functions.

### Risk management follows a structured process of:



#### Risk identification

A comprehensive risk register is formed with the most likely risks for a power business. Along with this, a list of lead and lag indicators are identified. The qualitative and quantitative thresholds are identified, and these trigger the consequent risk assessment and mitigation process.



#### Risk assessment and prioritization

Based on the severity of the identified risks, they are assessed and prioritized.



#### Risk mitigation

For each of the prioritized risks, comprehensive risk mitigation strategies are defined and documented in the risk register.

### Key Risks

Based on the nature and severity of all the risks, the key risks are identified, assessed and mitigation measures are strategized.

Some of these broad risk categories are:

#### Business and Commercial Risks



These are risks related to business set-up and the ongoing commercial risks such as market volatility, emergence of new business models, lack of long-term fuel security, infrastructural requirements, and volatility in demand, among others.

**Mitigation:** In order to monitor any upcoming changes in the operating environment, the respective functions are on constant lookout for such risks. And alternative measures in terms of looking for new sources of raw materials, development of new markets, and safeguards against demand volatility are all taken care of.

#### Operational Risk



These arise mostly due to the lapses in processes set up internally in the organization. These are risks pertaining to business operations such as compliance to O&M practices, supply chain management as well as risks associated with non-availability of plant due to forced shutdowns or project delays. They serve as a check to ensure uninterrupted working of plants.

**Mitigation:** Robust implementation of management standards, constant focus on business excellence as well as corrective measures driven by innovative practices optimises efficiency and productivity and mitigates any operational risk.

#### Regulatory Risk



These are risks related to adverse developments in the regulatory environment that may negatively impact processes and lead to losses in revenue, fuel security and other business opportunities. Given the highly regulated nature of the power business, assessing and managing regulatory risks is critical. Any adverse development in this can lead to huge fines, plant shutdown and loss of public image. Change in governments, policies or laws and regulations may directly or indirectly impact business.

**Mitigation:** We have a defined compliance monitoring system which helps us keep ourselves updated on regulations. The legal team ensures that all the other functions are complying with these regulations. Moreover, being an industry leader, we take active part in liaisoning with the regulatory authorities and participating in advocacy activities.

#### Financial Risk



These risks pertain to reduced accessibility to funds, increase in cost of funding or the ability to provide adequate returns. These may arise out of inappropriate fund allocation and may, in some cases, even lead to credit risk, litigation and loss of reputation.

**Mitigation:** We ensure that we have a well distributed capital structure which helps us cope with the market exigencies.

#### People Risk



This risk can impact the firm's ability to attract appropriate talent as well as in sub-optimal utilization of the existing resources. These are also related to productivity and attrition of available manpower and can have a direct impact on innovation and leadership within the firm. Typical risks include poaching of employees by competitors, slowing career growth, inadequate training, lack of communication with higher management, and low employee productivity, among others.

**Mitigation:** Ensuring people's career growth, maintaining health & safety standards, adopting best practices in managing human resources are some of the measures we adopt in order to mitigate people-related risks. We define a clear growth path for each and every employee; and talent supersedes all other considerations as we believe in providing equal opportunities to each of them.

## Security Risk



This risk relates to three main dimensions – assets, employees and intellectual capital. All these dimensions are equally important and need to be handled with equal rigour. Safety violations in a power company can often lead to extreme consequences such as loss of life.

**Mitigation:** In the current changing workplace scenario, we are highly vigilant of data security and related intellectual property. We also remain cautious of safeguarding all our physical and intellectual assets. Safety is the topmost priority of our Company and we have adopted world renowned standards of industrial safety.

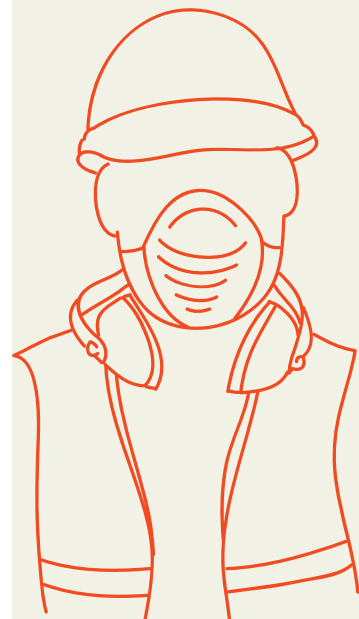
## Enterprise and Governance Risk



These are risks related to enterprise and inter-organizational risks including strategy, decision-making and governance. For a growing organization such as Adani Power Limited, a long-term strategy, its effective implementation and coordination with other group companies is highly critical.

**Mitigation:** Our Board of Directors function in alignment with the Group's overall philosophy, which is overseen by the Chairman. We follow the industry's best practices as far as Corporate Governance is concerned.

## Emerging Risks



**With the current global challenges presented by COVID-19 pandemic, we have re-evaluated our risks and are trying to strengthen our risk management and mitigation system to avert such emerging risks.**

The key emerging risks we have identified include:

- Emergency preparedness in the face of scenarios such as a pandemic, widespread and long-term climate-related disasters and national emergency. In such scenarios, business continuity itself will be threatened. Hence, we are prepared to take robust safeguards against such risks.
- Another key risk area that has the capacity to pose a significant challenge in the coming years is cyber security and data privacy. With the global dynamics changing drastically and with large-scale dependence of many businesses on global data networks, cyber security can pose a significant threat to businesses.



**Mr. Sanjay Rawal**

CIO, Thermal Business - Information Technology



We are in the process of implementing an information security management system (ISMS), ISO 27001 and have partnered with one of the Big 4 agencies for the same. We are also leveraging futuristic technologies for actionable insights and process automation through robotic process automation in our plant operations and Energy Network Operation Centre (ENOC). These initiatives will help in automated reporting and improved performance.

## Board of Directors



GRI 102-22



GRI 102-23



GRI 102-18



GRI 405-1

## Board of Directors

(as on 31<sup>st</sup> March, 2020)

**Mr. Gautam S. Adani, Chairman**

**Mr. Raminder Singh Gujral, Director**

**Mr. Rajesh S. Adani, Managing Director**

**Mr. Mukesh Shah, Director**

**Mr. Vneet S Jaain, Whole-time Director**

**Ms. Gauri Trivedi, Director**

Details of Board and Committees of the Board is available with AR 2019-20, page 81.



GRI 102-22



AR 77 to 88



GRI 102-45 (Financial Statements, Page 38-41, AR 2019-20)



GRI 102-46



GRI 102-48/102-49



GRI 102-50/102-51/102-52/102-53/102-54

## Methodology Note

Adani Power Limited has been publishing its Sustainability Report since 2015. In FY 2019-20, the Sustainability Report intends to present a concise and comprehensive view of the Company's Environmental, Social and Governance practices and performance to all its stakeholders. Apart from presenting the sustainability context, strategy, material topics and stakeholder engagement mechanisms, the Report's content has been grouped into these three broad sections of Environment, Social and Governance for better understanding of the readers.

### How has the document been developed?

The Report has been prepared according to GRI Standards in accordance Comprehensive option and content formulation process has been based on the principles of relevance ("materiality"), stakeholder inclusivity, sustainability context and completeness of data and information. The content is also aligned to disclosure requirements of investor bodies such as CDP, the Dow Jones Sustainability Index as

well as FTSE 4 Good index. The key objectives of our sustainability strategy have also been mapped to the United Nation's Sustainable Development Goals, which we are contributing to by working towards these objectives. The climate related disclosures are in line with the principles of TCFD. The report content is also formulated considering the International <Integrated Reporting> Framework.

### Materiality and Inclusivity

The principle of materiality is key to developing the Report's content. The material topics, their relevance and the boundaries have all been defined in the 'ESG Priorities' section of the Report page no. 28. The material issues are being identified and assessed based on the outcomes of stakeholder engagement as well as constant monitoring of external and internal factors that impact the Company's performance.





**KPMG Assurance and Consulting Services LLP**  
 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> Floor, Lodha  
 Excelus, Apollo Mills Compound  
 N. M. Joshi Marg, Mahalaxmi  
 Mumbai - 400 011

Telephone: +91 (22) 3989 6000  
 Fax: +91 (22) 3090 2511  
 Internet: www.kpmg.com/in

The process of materiality assessment and stakeholder identification and prioritization is depicted here:



### Scope and Reporting Boundaries

The scope of the Report includes our under construction, planned and operational power plants. Our internal aspect boundary includes thermal power plants and the solar plant at Bitta, Gujarat. It also includes its subsidiaries, Adani Power Mundra Limited's plant at Mundra (Gujarat), Adani Power Maharashtra Limited's plant at Tiroda (Maharashtra), Adani Power Rajasthan Limited's plant at Kawai (Rajasthan) and Udupi Power Corporation Limited's plant at Udupi (Karnataka). Corporate office is at Ahmedabad (Gujarat) and under construction Thermal Power Plant (TPP) of Adani Power Jharkhand Limited is at Godda (Jharkhand). The external aspect boundary includes external impact areas and stakeholders in our value chain, including upstream and downstream value chain partners, business partners, vendors, government agencies and local communities at these locations.

There have been no significant/reportable changes in the Company's supply chain which can influence the impacts, calculation of data or scope of the Report.

### Assurance

We believe that independent assurance leads to quality and process improvements. It reassures readers and our management that the information we publish is accurate and material, and therefore, it contributes to building trust and credibility with key interest groups.

We engage professional assurance providers who combine the strengths of non-financial assurance experience with technical competency in environmental and social standards. This Report has been assured by KPMG India, a third-party assurance provider.

### Independent Limited Assurance Statement to Adani Power Limited on its Environment, Social and Governance (ESG) Report for Financial Year 2019-20

To the Management of Adani Power Limited, Adani Corporate House, Shantigram, SG Highway, Ahmedabad - 382421

#### Introduction

We ('KPMG Assurance and Consulting Services LLP' or 'KPMG') have been engaged for the purpose of providing assurance on the selected disclosures presented in the ESG Report ('the Report') of Adani Power Limited ('APL' or 'the Company') for FY 2019-20. Our responsibility was to provide limited assurance on the Report content as described in the scope, boundary and limitations.

#### Reporting Criteria

APL applies its own reporting criteria based on the following standards:

- Global Reporting Initiative (GRI) Standards
- Integrated Reporting framework by the International Integrated Reporting Council (IIRC)
- United Nations' Sustainable Development Goals (UN SDGs)
- Principles of United Nations Global Compact (UNGC)
- Task Force on Climate Related Financial Disclosures (TCFD)
- Carbon Disclosure Project (CDP)

#### Assurance Standards Used

We conducted our assurance in accordance with

- Limited Assurance requirements of International Federation of Accountants' (IFAC) International Standard on Assurance Engagements (ISAE) 3000 (revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information. Under this standard, we have reviewed the information presented in the Report against the characteristics of relevance, completeness, reliability, neutrality and understandability.
- Type 2, Moderate level assurance requirements of AA1000 Assurance Standard 2008 (AA1000AS 2008) by Accountability. Under this standard, we have reviewed the nature and extent of adherence to the AA1000APS 2008 principles mentioned below:

- The Principle of Inclusivity:** An organization shall be inclusive.
- The Principle of Materiality:** An organization shall identify its material issues.
- The Principle of Responsiveness:** An organization shall respond to stakeholder issues that affect its performance.

#### Scope, Boundary and Limitations

- The scope of assurance covers selected non-financial disclosures of APL for the period 01 April 2019 to 31 March 2020.



The GRI Disclosures<sup>1</sup> subject to assurance were as follows:

|   |
|---|
| <b>General Disclosures</b>  |
| <ul style="list-style-type: none"> <li>Organizational Profile: 102-2, 102-3, 102-4, 102-6, 102-7, 102-8, 102-10</li> <li>Strategy: 102-14</li> <li>Ethics and Integrity: 102-16, 102-17</li> <li>Governance: 102-18, 102-19, 102-20, 102-26, 102-30, 102-31, 102-32</li> <li>Stakeholder Engagement: 102-40 to 102-43</li> <li>Reporting Practice: 102-46 to 102-56</li> </ul>  |
| <b>Management Approach</b>  |
| <ul style="list-style-type: none"> <li>103-1 - Explanation of the material topic and its Boundary</li> <li>103-2 – The management approach and its components</li> <li>103-3 – Evaluation of the management approach</li> </ul>   |
| <b>Topic Specific Disclosures</b>   |
| <ul style="list-style-type: none"> <li>Environmental <ul style="list-style-type: none"> <li>301 Materials 2016: 301-1</li> <li>302 Energy 2016: 302-1, 302-2*, 302-3</li> <li>303 Water and effluents 2018: 303-1, 303-2, 303-3, 303-4, 303-5</li> <li>304 Biodiversity 2016: 304-1, 304-2, 304-4</li> <li>305 Emissions 2016: 305-1, 305-2, 305-3**, 305-4</li> <li>306 Effluents and Waste 2016: 306-1, 306-2</li> </ul> </li> <li>Social <ul style="list-style-type: none"> <li>401 Employment 2016: 401-1, 401-2, 401-3</li> <li>402 Labour/Management Relations 2016: 402-1</li> <li>403 Occupational Health and Safety 2016: 403-2, 403-3</li> <li>404 Training and Education 2016: 404-1 to 404-2</li> <li>405 Diversity and Equal Opportunity 2016: 405 – 1</li> <li>410 Security Practices 2016: 410-1</li> <li>413 Local communities 2016: 413-1</li> </ul> </li> </ul> |

\* Data for energy consumption outside of the organization was restricted to upstream transportation and distribution category for FY 2019-20

\*\* Scope 3 emission data are restricted to upstream transportation and distribution category for FY 2019-20

The boundary of the Report covers APL operations in India which include:

- Thermal power plants
  - Mundra, Gujarat
  - Tiroda, Maharashtra
  - Kawai, Rajasthan
  - Udupi, Karnataka
  - Raipur, Chhattisgarh
  - Raigarh, Chhattisgarh
  - Godda, Jharkhand
- Solar power generation unit at Bitta, Gujarat
- Corporate office at Ahmedabad, Gujarat



The data review and validation were restricted to the Corporate office and sites mentioned above. The review and management interactions were performed virtually using screen sharing tools. Based on the information provided by APL, we have assessed the internal controls and systems.

The assurance scope excludes following:

- Data related to Company's financial performance
- Data and information outside the defined reporting period
- The Company's statements that describe expression of opinion, belief, aspiration, expectation, aim, future intention provided by the Company and assertions related to Intellectual Property Rights and other competitive issues
- Data review outside the operational sites as mentioned in the boundary above
- Strategy and other related linkages expressed in the Report
- Mapping of the report with other reporting frameworks
- Aspects of the Report other than those mentioned under the scope above

#### Assurance Procedures

Our assurance process involves performing procedures to obtain evidence about the reliability of specified disclosures. The nature, timing and extent of procedures selected depend on our judgment, including the assessment of the risks of material misstatement of the selected sustainability (ESG) disclosures whether due to fraud or error. In making those risk assessments, we have considered internal controls relevant to the preparation of the Report in order to design assurance procedures that are appropriate in the current circumstances.

Our assurance procedures also included:

- Assessment of APL's reporting procedures regarding their consistency with the application of GRI Standards.
- Evaluating the appropriateness of the quantification methods used to arrive at the sustainability disclosures presented in the Report.
- Review of systems and procedures used for quantification, collation, and analysis of sustainability disclosures included in the Report.
- Understanding the appropriateness of various assumptions, estimations and materiality thresholds used by APL for data analysis.
- Reviewing the materiality and stakeholder engagement framework deployed at APL.
- Assessment of data reliability and accuracy.
- Review of selected key performance data as defined in scope, boundary and limitations was carried out on a sample basis through video conferencing with corporate office.

Appropriate documentary evidences were obtained to support our conclusions on the information and data verified. Where such documentary evidences could not be collected due to sensitive nature of the information, our team verified the same with the APL during virtual interactions.

#### Conclusions

We have reviewed selected non-financial disclosures in the Report of APL for FY 2019-20. Based on our review and procedures performed, nothing has come to our attention that causes us not to believe that the sustainability data and information as per the scope of assurance presented in the Report is appropriately stated, in all material respects and in accordance with GRI standards.

<sup>1</sup> For details regarding the disclosures please refer the GRI Content Index on Page 104-106





We have provided our observations to the Company in a separate management letter. These, do not, however, affect our conclusions regarding the Report.

**As per AA1000 APS 2008 principles:**

- **Principle of Inclusivity:** We are not aware of any matter that would lead us to conclude that the Company has not applied principle of inclusivity while engaging with key stakeholder groups. The Report communicates the frequency and the mode of engagement with stakeholders – both internal and external, highlighting the outcomes of interactions and the Company's response towards the same. The Company may consider engaging with all relevant stakeholders of the recently acquired operational locations and integrate it with the disclosures in the Report.
- **Principle of Materiality:** The methodology of materiality determination used for the Report takes into consideration the principles of reporting as per GRI Standards. Nothing has come to our attention that causes us to believe that material topics so identified have been excluded by the Company. The Company reviews its material topics internally. The Company may determine a periodic frequency for materiality assessment taking into account the changes in reporting frameworks, emerging regulations, risks and impacts on its business.
- **Principle of Responsiveness:** We are not aware of any matter that causes us to believe that the Company has not applied principle of responsiveness while responding to the stakeholders' concerns related to environmental and social performance. APL has processes and systems in place to monitor performance against stakeholder priorities and respond to it. The Company may consider disclosing the response of its performance to the stakeholders in a timely manner.

**Reliability**

Nothing has come to our attention that causes us not to believe that the information has been presented fairly, in material respects, in keeping with the reporting principles. APL monitors the sustainability performance data across all its operations mentioned in the boundary of the Report. The monitoring mechanism and its related internal controls may be further strengthened with respect to the sustainability disclosures especially on occupational health and safety and workforce related indicators.

**Independence**

The assurance was conducted by a multidisciplinary team including professionals with suitable skills and experience in auditing environmental, social and economic information in line with the requirements of ISAE 3000 (Revised) standard and AA1000AS (2008) standards.

Our work was performed in compliance with the requirements of the IFAC Code of Ethics for Professional Accountants, which requires, among other requirements, that the members of the assurance team (practitioners) be independent of the assurance client, in relation to the scope of this assurance engagement, including not being involved in writing the Report. The Code also includes detailed requirements for practitioners regarding integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. KPMG has systems and processes in place to monitor compliance with the Code and to prevent conflicts regarding independence. The firm applies ISQC 1 and the practitioner complies with the applicable independence and other ethical requirements of the IESBA code.

**Responsibilities**

APL is responsible for developing the Report contents. APL is also responsible for identification of material sustainability topics, establishing and maintaining appropriate performance management and internal control systems and derivation of performance data reported. This statement is made solely to the Management of APL in accordance with the terms of our engagement and as per scope of assurance. Our



work has been undertaken so that we might state to APL those matters for which we have been engaged to state in this statement and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than APL for our work, for this report, or for the conclusions expressed in this independent assurance statement. The assurance engagement is based on the assumption that the data and information provided to us is complete and true. We expressly disclaim any liability or co-responsibility for any decision a person or entity would make based on this assurance statement. Our report is released to APL on the basis that it shall not be copied, referred to or disclosed, in whole or in part, without our prior written consent. By reading this assurance statement, stakeholders acknowledge and agree to the limitations and disclaimers mentioned above.



Prathmesh Raichura  
Executive Director



KPMG Assurance and Consulting Services LLP  
22 December 2020

# GRI Content Index

This report has been prepared in accordance with the GRI Standards: Comprehensive option.

| GRI Standard | Brief Description   | Page No. of Report |
|--------------|---|--------------------|
| 102-1        | Name of the organization  | Cover Page         |
| 102-2        | Activities, brands, products, and services                                    | 6-9                |
| 102-3        | Location of headquarters  | End cover          |
| 102-4        | Location of operations  | 9                  |
| 102-5        | Ownership and legal form  | 6                  |
| 102-6        | Markets served  | 9; AR Pg 49-54     |
| 102-7        | Scale of the organization   | 9, 67; AR 158      |
| 102-8        | Information on employees and other workers                                    | 67                 |
| 102-9        | Supply chain  | 78-79              |
| 102-10       | Significant changes to the organization and its supply chain                  | Nil                |
| 102-11       | Precautionary Principle or approach   | 26, 45, 52         |
| 102-12       | External initiatives  | 13                 |
| 102-13       | Membership of associations  | 13                 |
| 102-14       | Statement from senior decision-maker  | 20-25              |
| 102-15       | Key impacts, risks, and opportunities   | 28-30, 94          |
| 102-16       | Values, principles, standards, and norms of behavior                          | 4                  |
| 102-17       | Mechanisms for advice and concerns about ethics                               | 66, 91             |
| 102-18       | Governance structure  | 27, 97             |
| 102-19       | Delegating authority  | 27                 |
| 102-20       | Executive-level responsibility for economic, environmental, and social topics | 27                 |
| 102-21       | Consulting stakeholders on economic, environmental, and social topics         | 27                 |
| 102-22       | Composition of the highest governance body and its committees                 | AR 77-90           |
| 102-23       | Chair of the highest governance body  | AR 78              |
| 102-24       | Nominating and selecting the highest governance body                          | AR 83              |
| 102-25       | Conflicts of interest   | AR 77-95           |
| 102-26       | Role of highest governance body in setting purpose, values, and strategy      | AR 86              |
| 102-27       | Collective knowledge of highest governance body                               | AR 79-80           |
| 102-28       | Evaluating the highest governance body's performance                          | AR 84              |
| 102-29       | Identifying and managing economic, environmental, and social impacts          | 94-96, AR 87       |
| 102-30       | Effectiveness of risk management processes                                    | 94 -96, AR 87      |
| 102-31       | Review of economic, environmental, and social topics                          | 26-29              |
| 102-32       | Highest governance body's role in sustainability reporting                    | 26-29              |
| 102-33       | Communicating critical concerns   | 26-29              |
| 102-34       | Nature and total number of critical concerns                                  | AR 102             |
| 102-35       | Remuneration policies   | AR 60, 84-85       |
| 102-36       | Process for determining remuneration  | AR 60, 84-85       |
| 102-37       | Stakeholders' involvement in remuneration                                     | AR 60              |
| 102-38       | Annual total compensation ratio   | AR 60              |
| 102-39       | Percentage increase in annual total compensation ratio                        | AR 60              |
| 102-40       | List of stakeholder groups  | 33-34              |
| 102-41       | Collective bargaining agreements  | 73                 |
| 102-42       | Identifying and selecting stakeholders  | 33-34              |
| 102-43       | Approach to stakeholder engagement  | 33-34              |
| 102-44       | Key topics and concerns raised  | 33-34              |
| 102-45       | Entities included in the consolidated financial statements                    | AR 38-41           |
| 102-46       | Defining report content and topic boundaries                                  | 97-98              |
| 102-47       | List of material topics   | 28-30              |
| 102-48       | Restatements of information   | 2, 50              |
| 102-49       | Changes in reporting  | Nil                |
| 102-50       | Reporting period  | 1                  |

| GRI Standard | Brief Description   | Page No. of Report |
|--------------|---|--------------------|
| 102-51       | Date of most recent report  | 1                  |
| 102-52       | Reporting cycle   | 1                  |
| 102-53       | Contact point for questions regarding the report  | 25                 |
| 102-54       | Claims of reporting in accordance with the GRI Standards  | 1                  |
| 102-55       | GRI content index   | 104                |
| 102-56       | External assurance  | 99-103             |
| 103-1        | Explanation of the material topic and its Boundary  | 28-30              |
| 103-2        | The management approach and its components  | 41, 64             |
| 103-3        | Evaluation of the management approach   | 41, 64             |
| 201-1        | Direct economic value generated and distributed   | 9                  |
| 201-2        | Financial implications and other risks and opportunities due to climate change  | 42-49              |
| 201-3        | Defined benefit plan obligations and other retirement plans   | AR 191             |
| 201-4        | Financial assistance received from government   | AR 199-200         |
| 202-1        | Ratios of standard entry level wage by gender compared to local minimum wage  | 66,68              |
| 202-2        | Proportion of senior management hired from the local community  | 66-69              |
| 203-1        | Infrastructure investments and services supported   | AR 64              |
| 203-2        | Significant indirect economic impacts   | AR 80-87           |
| 204-1        | Proportion of spending on local suppliers   | 78                 |
| 205-1        | Operations assessed for risks related to corruption   | 93                 |
| 205-2        | Communication and training about anti-corruption policies and procedures  | 69                 |
| 205-3        | Confirmed incidents of corruption and actions taken   | 93                 |
| 206-1        | Legal actions for anti-competitive behavior, anti-trust, and monopoly practices   | 92                 |
| 301-1        | Materials used by weight or volume  | 50                 |
| 301-2        | Recycled input materials used   | 50                 |
| 301-3        | Reclaimed products and their packaging materials  | NA*                |
| 302-1        | Energy consumption within the organization  | 50                 |
| 302-2        | Energy consumption outside of the organization  | 50                 |
| 302-3        | Energy intensity  | 44                 |
| 302-4        | Reduction of energy consumption   | 44                 |
| 302-5        | Reductions in energy requirements of products and services  | NA*                |
| 303-1        | Interactions with water as a shared resource  | 56                 |
| 303-2        | Management of water discharge-related impacts   | 56                 |
| 303-3        | Water withdrawal  | 54                 |
| 303-4        | Water discharge   | 56                 |
| 303-5        | Water consumption   | 54                 |
| 304-1        | Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas | 60-61              |
| 304-2        | Significant impacts of activities, products, and services on biodiversity   | 60-61              |
| 304-3        | Habitats protected or restored  | 60-61              |
| 304-4        | IUCN Red List species and national conservation list species with habitats in areas affected by operations                                | 60-61              |
| 305-1        | Direct (Scope 1) GHG emissions  | 44                 |
| 305-2        | Energy indirect (Scope 2) GHG emissions   | 44                 |
| 305-3        | Other indirect (Scope 3) GHG emissions  | 44                 |
| 305-4        | GHG emissions intensity   | 44                 |
| 305-5        | Reduction of GHG emissions  | 45                 |
| 305-6        | Emissions of ozone-depleting substances (ODS)   | 45                 |
| 305-7        | Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions   | 59                 |
| 306-1        | Water discharge by quality and destination  | 51-56              |
| 306-2        | Waste by type and disposal method   | 57-58              |
| 306-3        | Significant spills  | 58                 |
| 306-4        | Transport of hazardous waste  | 58                 |
| 306-5        | Water bodies affected by water discharges and/or runoff   | 51-56              |
| 307-1        | Non-compliance with environmental laws and regulations  | 61                 |
| 308-1        | New suppliers that were screened using environmental criteria   | 78-79              |

\* APL is in B2B category and only product is electricity sold. Hence, these disclosures are not applicable



| GRI Standard                      | Brief Description  | Page No. of Report |
|-----------------------------------|--|--------------------|
| 308-2                             | Negative environmental impacts in the supply chain and actions taken   | 78-79              |
| 401-1                             | New employee hires and employee turnover   | 68                 |
| 401-2                             | Benefits provided to full-time employees that are not provided to temporary or part-time employees                                     | 70                 |
| 401-3                             | Parental leave   | 70                 |
| 402-1                             | Minimum notice periods regarding operational changes   | 71                 |
| 403-1                             | Workers representation in formal joint management-worker health and safety committees  | 74                 |
| 403-2                             | Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities          | 77                 |
| 403-3                             | Workers with high incidence or high risk of diseases related to their occupation   | 77                 |
| 403-4                             | Health and safety topics covered in formal agreements with trade unions  | 77                 |
| 404-1                             | Average hours of training per year per employee  | 69                 |
| 404-2                             | Programs for upgrading employee skills and transition assistance programs  | 68-70              |
| 404-3                             | Percentage of employees receiving regular performance and career development reviews   | 72                 |
| 405-1                             | Diversity of governance bodies and employees   | AR 78; 67          |
| 405-2                             | Ratio of basic salary and remuneration of women to men   | 66, 68             |
| 406-1                             | Incidents of discrimination and corrective actions taken   | 66; AR 102         |
| 407-1                             | Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk                         | 66; AR 102         |
| 408-1                             | Operations and suppliers at significant risk for incidents of child labor  | 66; AR 102         |
| 409-1                             | Operations and suppliers at significant risk for incidents of forced or compulsory labor   | 66; AR 102         |
| 410-1                             | Security personnel trained in human rights policies or procedures  | 66; AR 102         |
| 411-1                             | Incidents of violations involving rights of indigenous peoples   | 66; AR 102         |
| 412-1                             | Operations that have been subject to human rights reviews or impact assessments  | 66; AR 102         |
| 412-2                             | Employee training on human rights policies or procedures   | 66                 |
| 412-3                             | Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening             | 66                 |
| 413-1                             | Operations with local community engagement, impact assessments, and development programs   | 80-87              |
| 413-2                             | Operations with significant actual and potential negative impacts on local communities   | 80; AR 102         |
| 414-1                             | New suppliers that were screened using social criteria   | 78-79              |
| 414-2                             | Negative social impacts in the supply chain and actions taken  | 78-79              |
| 415-1                             | Political contributions  | 93                 |
| 416-1                             | Assessment of the health and safety impacts of product and service categories  | NA*                |
| 416-2                             | Incidents of non-compliance concerning the health and safety impacts of products and services  | NA*                |
| 417-1                             | Requirements for product and service information and labeling  | NA*                |
| 417-2                             | Incidents of non-compliance concerning product and service information and labeling  | Nil                |
| 417-3                             | Incidents of non-compliance concerning marketing communications  | Nil                |
| 418-1                             | Substantiated complaints concerning breaches of customer privacy and losses of customer data   | Nil                |
| 419-1                             | Non-compliance with laws and regulations in the social and economic area   | 92-93              |
| Sector Specific Disclosure: EU-16 | Policies and requirements regarding health and safety of employees and employees of contractors and subcontractors (former EU16)       | 74-77              |
| Sector Specific Disclosure: EU-17 | "Days worked by Contractor and Sub-contractor employees involved in Construction, Operation & Maintenance Activities"                  | 77                 |
| Sector Specific Disclosure: EU-21 | Contingency planning measures, disaster/emergency management plan and training programs, and recovery/restoration plans (former EU-21) | 94-96, AR 87       |

\* APL is in B2B category and only product is electricity sold. Hence, these disclosures are not applicable