

ADANICONNEX PRIVATE LIMITED
CODE OF CONDUCT

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1. Context and Purpose:

AdaniConneX (hereinafter mentioned as "ACX" or "Organization") is one of the leading data center operators in the Country. In addition to offering quality services and generating financial value for our stakeholders, we are committed to operating to the highest ethical standards.

ACX's Directors, Employees, contract workers, consultants, secondees, and trainees (hereinafter mentioned as 'Employee/s') carry several activities as part of their role and engage with internal & external stakeholders on continuous basis. While pursuing business imperatives, it is important for the Employees to maintain highest standards of corporate conduct and business ethics, making the right choices when faced with ethical dilemmas and holding ourselves and each other to higher standards of behavior. To cater the requirement and ensure uniformity across organization ACX's Code of Conduct ("**Code**") is prepared.

It is mandatory for all Employees of ACX to follow the Code and comply in true letter and spirit. An annual declaration of the Code to be submitted by each Employee every year (annexed as **Annexure-A**).

2. Scope and Applicability

The Code provides general guidance about the ACX's expectations, highlights situations that may require particular attention and references additional resources and channels of communication available to the Employee. It clearly sets standards of behavior expected to be displayed in every interaction that an Employee carries in course of work. ACX lives up to stakeholder expectations by making sure that actions of its Employees and policies are not only within legal framework, but also in line with the highest levels of business ethics and personal integrity. This Code recognizes expectations of all stakeholders with whom ACX works.

The Code is applicable to all Employee working with **ACX Group**.

*For the purposes of this Code, **ACX Group** means ACX; any entity, operation, or investment more than 50% owned by ACX.*

Provisions of the Code are based on universal ideals and principles it's practice by Employees and Associates during business provides sustainability and success over long duration. Every Employee, Manager, Organizational Leader, and Management is expected to observe & comply with applicable laws, Company Policies and to norms detailed below.

It is responsibility of individual Employee to report any conduct or omission as non-compliance of the Code to the Compliance Officer at ACXcompliance@adani.com.

3. Equal opportunities employer and prevention of discrimination

ACX is committed to create a professional environment in which all individuals are treated with respect and dignity. ACX doesn't discriminate or treat Employees and associates or job applicants unfairly. It is committed to provide equal opportunity in employment without discrimination or harassment regardless of consideration for race, color, religion, gender, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, genetic information, or any other characteristic, which is protected by law.

ACX takes pride in providing equal opportunity and inclusion for all Employees through employment policies and practices ACX recognizes that a mix of backgrounds, opinions, and talent enriches & helps in achieving growth and success. Accordingly, all Employees needs to ensure adherence to these norms of equal opportunity & inclusion during employment with ACX.

For more information read the "Policy on "Diversity, Equity and Inclusion".

4. Prevention of Harassment

ACX exhibits & practices zero tolerance towards any kind of discrimination, bullying, harassment, inappropriate or abusive conduct by or against Employees, Customers, Suppliers, Contractors, or any other individuals who conduct business with ACX.

Organizational leaders are responsible for creating a conducive work culture and environment built on human dignity, empathy, tolerance, understanding, mutual

respect and collaboration. Protection for personal privacy is of utmost importance. They are expected to avoid actions or behavior, which are or could be, viewed as harassment.

Everyone in work environment is expected to be treated with dignity and respect and adherence to this is individual's responsibility. Any form of harassment, physical, verbal, or psychological is prohibited. 'Prevention of Sexual Harassment (POSH) law and company policy are to be adhered and complied in true letter & in spirit.

For more information read "Non-Discrimination and Anti-Harassment Policy" and "Human Rights Policy".

5. Confidentiality and Data Protection

Trust and Transparency is essential for success of any business and is one of the core values of ACX. Our customers, suppliers and companies repose trust in Employees of ACX to be good stewards of their information, whether that information relates to financial, personal, or business matters. It is duty & responsibility of the Employee to keep such trust and protect the privacy of information.

Employees shall not make any willful omission or material misrepresentation that would compromise the integrity of records, internal or external communications and reports, including financial statements.

Confidential or proprietary information about clients, our organization, or other parties, which has been gained through employment or affiliation with ACX, may not be used for personal advantage or for the benefit of third parties. Employees are prohibited from disclosing confidential Company information.

Confidential information may be disclosed to following on 'need to know basis:

- a) Fellow Company Employees or third parties who have a legitimate clearance with confidentiality agreement.

- b) Those who have a clear duty or obligation to keep the information confidential.
- c) Those who have a legal obligation to disclose this information as required.

ACX will continue to comply with applicable provisions of Data Privacy and Information Security Policies.

6. Conflict of Interest

'Conflict of Interest' may occur when outside activities or personal interests' conflict, or appear to be in conflict, with assigned responsibility within Organization. ACX Employees shall act in the interest of Company and ensure that any business or personal association including close personal relationships which they may have, does not create any conflict of interest with their roles and duties. Should any actual or potential conflicts of interest arise, the concerned person must immediately disclose such conflict voluntarily and seek approvals from the Compliance Officer. Disclosure of the conflict shall be made in format annexed as Annexure-B.

Material transactions, particularly those involving the ACX's directors or executive officers, must be reviewed and approved in writing in advance by the Audit and Compliance Committee. All related part transactions must be fully disclosed, conducted at arm's length and with no preferential treatment.

For more information read "Anti Bribery and Corruption Policy".

7. Antitrust / Anti-Competitive Practices

ACX participates in growth of competitive, open markets and liberalization of trade and investment the country and market within which it operates. ACX and ACX Group shall not enter any activity constituting anticompetitive behavior such as abuse of market dominance, collusion, participation in cartels or inappropriate exchange of information with competitors. ACX condemns any anti-competitive practices, and will continue to compete fairly, ethically within the framework of applicable competition laws.

8. Anti-money Laundering

Money-laundering means any attempted act to conceal or disguise the true origin and ownership of illegally obtained proceeds so that they appear to have originated from legitimate sources thereby avoiding prosecution, conviction, and confiscation of the illegal proceeds. ACX shall continue to comply with all applicable anti-money laundering, anti-fraud and anticorruption laws established processes to prevent any breaches of such laws will be complied and reviewed for compliance and adherence. Exceptions reported will continue to be acted upon

For more information read the "Anti-Money Laundering Policy"

9. Integrity, Fraud, and Corruption

ACX follows a zero-tolerance policy for towards Fraud, Bribery, Corruption or facilitation payment in any form, whether in government or government dealings ACX ensures that all applicable anti-bribery & anti-corruption laws are adhered to and complied with.

Employee shall neither receive nor offer nor make directly or indirectly, any illegal payments, remuneration, gifts, or comparable benefits that are intended to obtain uncompetitive favors for the conduct of its business. The company shall cooperate with governmental authorities in efforts to eliminate all forms of bribery, fraud, and corruption.

ACX does not allow or ignore signs of someone acting on its behalf, paying or receiving any bribe, kickback, or facilitation payment. Any request or offer for a bribe or kickback should be refused and immediately reported to the Compliance Officer.

For more information read "Anti-Bribery and Corruption Policy".

10. Environment, Health, and Safety

ACX shall continue to provide a safe, healthy, clean and ergonomic working environment for its Employees & other Associates. It will continue with its efforts towards wholesome wellness of Employees and shall prevent wasteful use of natural resources. It will endeavor to offset the effect of climate change in all spheres of its activities.

ACX is committed to using international standards on health, safety & wellness for all its Employees & other Associates. It ensures compliance to best practices, which are applied to lifecycle of all operations. All Employees & Associates are expected to act positively to prevent injury, ill health, damage, and loss arising from its operations as well as to comply with all regulatory or other legal requirements pertaining to safety, health, and environment.

For more information read "Occupational Health and Safety Policy" and "Environment, Social and Governance (ESG) Policy."

11. Political Activities

ACX reserves the right to communicate its position on important issues to the elected representatives and other government officials. ACX funds or assets must not be used as contribution for political campaigns or political practices under any circumstances.

Any personal political activities undertaken by you should be kept totally separate from the ACX Group and you shall not refer to the ACX Group or use ACX Group resources.

For more information read the "Anti-Bribery and Corruption Policy".

12. Maintaining Accurate Records

Our investors' trust is based on their confidence in the accurate recording of our financial transactions. The integrity of our financial transactions and records is

critical to the operation of our business. It is duty & responsibility of Employees to adhere to, relevant accounting and financial reporting principles, standards, laws, rules, and regulations and the ACX's financial and accounting policies, controls, and procedures.

13. Safeguarding Company Assets

All company assets, tangible and intangible shall be used for the purpose for which they are provided and to conduct our business only. Such assets shall not be misused. Employees shall ensure to minimize the risk of fraud, and misappropriation or misuse of the assets.

Employee shall respect and protect all confidential information and intellectual property of ACX, Customers, Suppliers and other information received during employment. Employees shall promptly report the loss, theft or destruction of any confidential information or intellectual property and data of the ACX or that of any third party.

14. Working with Stakeholders

ACX ensure that all our service providers are appointed at a competitive pricing and equal opportunity is provided to all. Employee should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

ACX expect that its suppliers and sub-contractors to operate with the highest ethical standards and in consonance with the Code.

For more information read "Supplier Code of Conduct", "Sanction Policy" and "Business Partner Due Diligence Policy".

15. Reporting

All Employees of ACX shall promptly report, any actual or possible violation of the Code or an event of misconduct, act of misdemeanor or an act against company's

interest to the Compliance Officer at ACXcompliance@adani.com.

ACX encourage everyone to raise questions and concerns and to make reports in good faith. Retaliatory behavior against those who raise concerns in good faith is never tolerated.

Any concern raised or any known or suspected violations of the Code will be governed by the ACX Whistleblowing Policy.

16. Disciplinary Action

Employees are expected to follow the Code in true letter and spirit and enhance the culture of compliance at ACX. Any violation of the Code will be taken seriously, all concerns reported will be investigated in accordance with the Whistleblowing Policy.

Detailed investigation to be conducted after a concern is raised following the 'Principles of Natural Justice'. After the detailed investigation if the concern is proved true. Disciplinary action can be taken by ACX Management basis the recommendation made by the Investigator in writing for violation of the Code,

17. Governance

The Compliance Officer is responsible for the implementation the Code. The Compliance Officer will report to the Audit and Compliance Committee of ACX at least quarterly on the implementation and details of concerns raised.

18. Training

All Employees will receive training on this Code on induction and as and when required by ACX. All ACX Group Personnel responsible for the procedures set out herein and management of the business must complete this training at-least once every year successfully.

19. Amendments

Amendments to the Code will need approval of the CEO and the Board.

20. Revision History

Issue No	Version No	Issue Date	Summary of Changes
1	1.0	April 26 th , 2024	Initial Document

Annexure-A
Annual Self-declaration by Employees

I have received and read the ACX's Code of Conduct. I understand the standards contained in the Code and understand that there may be additional policies or laws specific to my job and/or the location of my posting. I further agree to follow the values of the Company in all that I do and comply with the Code.

I hereby declare that during the last Financial Year I did not find/identified any violation of the Code:

- True
- False

Details of violation of Code.

Employee Name:

Signature

Employee No:

Date

Annexure-B

Conflict of Interest Disclosure Form

Explanation: Conflict of interest is situation wherein any relationship, influence or activity that will impair, or appear to impair, the ability of any Employee to do their job or make fair and objective decisions when performing their job, or that is not in the best interests of the ACX.

Note: For the purposes of the disclosure, Family includes Mother, Father, Son, Daughter, Mother-in-law, Father-in-law, Son-in-law, and Daughter-in-law. Financial interest means holding more than 5% shares in the Organization/Entity that competes with or provides products or services to ACX.

I confirm and disclose the following statements regarding my personal interests and associations that may create a conflict with my employment at ACX:

- a. I am not engaged in any outside employment or gainful activity which may conflict with the performance of my duties at ACX or to create any actual or potential conflict of interest.

- Agree
- Disagree (If disagree, please provide details in following table)

S. No.	Name of Company/Organization	Address	Type of Activity	Remarks

- b. I do not hold a directorship or board membership in any Company or organization other than ACX or ones appointed by ACX Boar of Directors

Approval

- Agree
- Disagree (If disagree, please provide details in following table)

S. No.	Name of Company/Organization	Address	Type of Directorship/Membership	Remarks

c. Neither I nor my family has any direct or indirect financial interest in any business that competes with or provides products or services to ACX

Agree

Disagree (If disagree, please provide details in following table)

S. No.	Name of Company/Organization	Address	Details of Financial Interest	Remarks

d. I am not the decision maker or in a direct reporting relationship of my Family working at ACX as an employee.

Agree

Disagree (If disagree, please provide details in following table)

S. No.	Name of employee with employee id	Name of Relative with employee id	Relation with employee	Nature of conflict (Decision Maker or Direct Report)

I disclose that I have not concealed anything, and the information provided by me is true, accurate and complete to the best of my knowledge and understanding.

I also acknowledge that I will make another disclosure to state any change in any matter contained in this disclosure to the Compliance Officer at ACXcompliance@adani.com as soon as I am aware of it.

Employee Name:

Signature

Employee No:

Date
