

**Ambuja  
Cement**

**ACC**

**adani**  
Cement



# Ambuja Cements Limited

Tax Transparency Report  
for Financial Year 2022-23

## Disclaimer

This voluntary report has been prepared by Ambuja Cements Limited (ACL) considering best practices and to the best of our knowledge. This report is for information purposes only.

This report might contain statements that are forward looking in nature. All statements other than statements of historical fact could be deemed as forward-looking in nature. Such statements are inherently subject to risks and uncertainties, some of which cannot be predicted or quantified. By accessing or relying on this report, you acknowledge that you will be solely responsible for your own assessment of the market and our market position and that you will conduct your own analysis and be solely responsible for forming your own view of the potential future performance of our business.

## No duty to update

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

## Our reporting ecosystem

We pay special attention to transparency and making content easy to find. This report is part of a broader reporting ecosystem which covers other topics relevant to Adani portfolio companies. The publications include among others Annual Report 2022-23.

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## The first word

# The Adani Portfolio Tax Transparency Report: An introduction

This is our maiden Tax Transparency Report. This is a voluntary extra-statutory initiative.

This exercise has been undertaken to enhance stakeholder transparency.

This forward-looking initiative comprises a holistic review of how we appraise the subject of tax management, our long-term policies, how we compute, what we pay and when we pay.

We believe that this document will reinforce what we believe: **'Growth with Goodness.'**



Our commitment

# Adani's commitment to 'Growth with goodness'

At the Adani Group, our directional objective has been best summed up in three words.

**'Growth with goodness.'**

This statement has reinforced a strategic clarity.

That anyone – company or individual – touched by our business must grow.

That our desired direction must result in positive outcomes.

The combination of growth and goodness represents not just a statement of purpose but also a platform for business sustainability.

This commitment explains our engagement with the government; tax payment represents our contribution to the government that makes it possible, in turn, for the government to provide society at large with an enabling environment that makes it possible for the country to sustain its growth momentum.

## Part 1: Overview

Perspective

# Tax and how its perception has evolved

## OVERVIEW

There has been a fundamental transformation in the way tax is perceived.

Conventionally, tax was seen as a cost for staying in business and a license to operate.

There has been a significant transformation since.

Tax transparency was a relatively unmapped subject until a couple of years ago; today, it is being increasingly accepted as a welcome and voluntary initiative communicating private contributions to public finances.

Tax is being increasingly perceived as a responsible obligation on the part of a payer that makes it possible for the government to provide society with an enabling platform.

There is another transformation that has transpired.

Rather than treat tax as a below-the-radar financial entry, a new generation of corporate thinkers are placing tax at the Centre of the governance circle.

There is a growing recognition that tax is not just an expense entry in the books of the payer; it is a valuable contribution that empowers governments to provide citizens with a range of facilities and benefits.

The result is that tax is now being widely accepted as a social lubricant; companies that pay sizable tax are celebrated as decisive contributors to economic progress.

As an extension of this reality, a secondary transformation is becoming evident: a growing shift in focus from the 'what' to the 'how'.

There is an increasing emphasis not merely on a consolidated statement of the tax paid by a company but also the need for transparent explanations: the policies related to tax management, quantum of various taxes, process of tax computation, compliance discipline that made timely payment a reality, the operating structure that made timely compliance possible and periodic checks (audits) covering the discipline.

Given the importance of this subject, there has been a growing recognition that the subject of tax responsibility resides at the core of governance.

This importance has necessitated a separate document called the Tax Transparency Report.

## The tax process discipline



Understanding



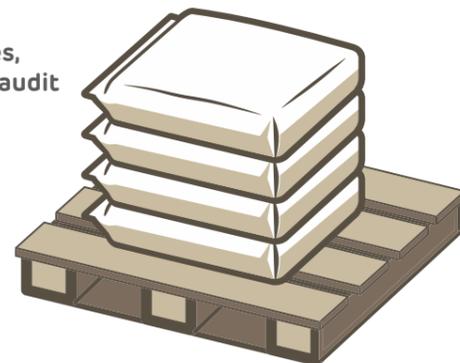
Policies



Processes



Compliances, payments and audit



Insight

# Tax and transparency

## OVERVIEW

The global tax environment has entered a new age.

Even as the Tax Transparency Report is not mandatory, forward-looking companies report this for wider stakeholder attention. Besides, there is a growing stakeholder need for tax information from large and multinational companies, creating the basis for maximum standards of tax transparency.

The subject has graduated from being a black box into one that forward-looking companies communicate publicly. In turn, this is emerging as one of the levers of long-term value creation for the wider stakeholder community.

There are good reasons for this change.

**One**, there has been a growing movement towards complete corporate transparency; it has become increasingly imperative

for the subject of tax to be treated as transparently as some of the other drivers of corporate working.

**Two**, the treatment of tax is influenced by various interpretations of tax laws and provisions, making it imperative to state what interpretation was used to arrive at tax computation.

**Three**, external stakeholders now need an understanding of the quantum of tax payments made, leading to informed investing decisions.

**Four**, stakeholders also need to know the nature of tax jurisdictions of the Company's presence and the number of tax concession years available, deepening an insight into prospective cash flows and reinvestments.

**Five**, there is a growing correlation between the quantum of tax paid by

companies and their valuations, making transparency integral to stakeholder perception and valuation.

**Six**, fair and sizable taxpayers are seen as builders of a modern society, strengthening their stakeholder recruitment and retention, leading to enhanced business sustainability.

**Seven**, companies receive taxes (on behalf of the government) related to the transaction that are then paid out to the government in addition to paying taxes on the profit generated by them, making it imperative to distinguish between the two for an informed understanding.

**Eight**, there is need for a consolidated picture on a company's holistic contribution (statutory taxes and levies) towards economic development and sustainability through tax payments.

## Tax: Enhanced transparency



Aligned with enhanced corporate reporting disclosures



Statement of tax computation interpretations



Aid to informed investing



Insight into tax concessions



Guide to prospective valuations



Enhanced corporate respect

# Tax transparency and governance

## OVERVIEW

There is a growing conviction that the treatment of tax is not at the periphery of a company's governance commitment, but integral to it.

At the Adani portfolio, tax and related payments represent the character of what we are (and hence influence what we do).

Our perspective has been influenced by the following understandings.

**One**, the biggest stakeholder in our business is the government; it provides all the platforms and freedoms that make it possible for us to stay and grow in business.

**Two**, the transparency related to tax payments (often complex) represents one of the most significant levers of corporate intent and pedigree.

**Three**, we believe that our contribution to the exchequer makes it possible for the government to reinvest in enabling infrastructure, which accelerates the virtuous national cycle.

**Four**, this voluntary exercise is a manifestation of what we believe: enhanced disclosures can be transformed into a deeper stakeholder understanding and competitive advantage.

The Adani portfolio's governance commitment ensures that tax

affairs are managed ethically and methodically, leading to stakeholder assurance.

The Adani tax teams engage with the business teams to understand the operating models of transactions. Tax decisions are initiated by competent tax professionals in collaboration with experienced business colleagues and senior management. To replicate progressive practices, the Group facilitates an exchange of best practices among Adani Group constituents.

The Adani portfolio's standard operating procedures and policies guide compliance. Besides, financial controls embedded in processes are periodically re-assessed.



## Responsible tax principles



# The tax universe

At the Adani portfolio, we are an intermediate collector of tax on behalf of the government that is then paid, as well as being a payer of tax in our own right.

This dual role puts a premium on the capacity to transparently report collections, disbursements and payments.

## The corporate tax range we cover

### Direct contribution

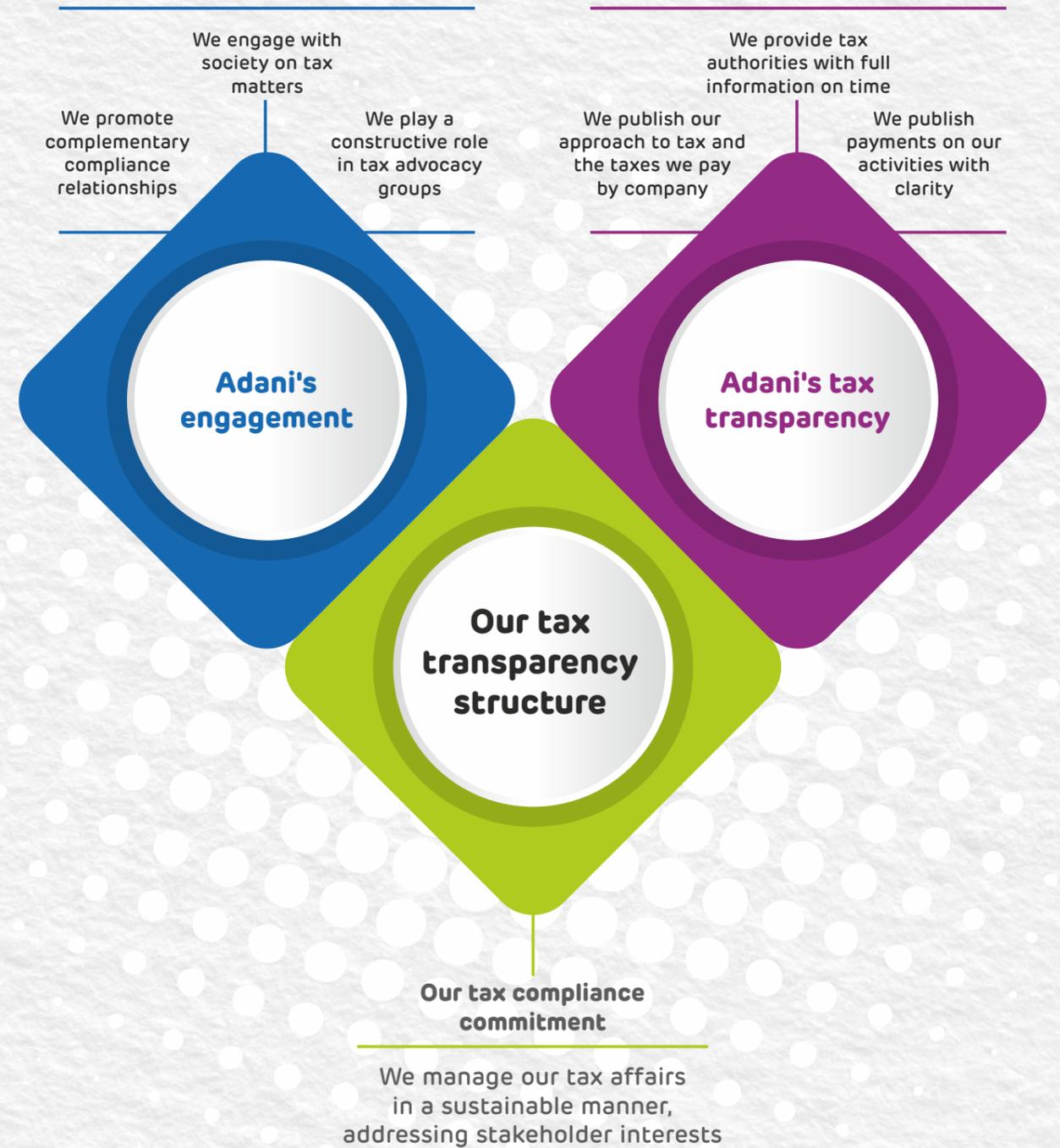
- Corporate tax on income
- Indirect tax borne
- Other charges
- Government Royalty

### Indirect contribution

- Withholding tax
- Indirect tax
- Other taxes

### Other contributions

- Social security



## Part 2: Perspective

# CEO's perspective



At Ambuja Cements Limited (ACL), and its subsidiaries including ACC Limited (ACC), our primary purpose is to be **'Committed to Building Nations with Goodness'**. We can say with a sense of pride and accomplishment that as a leading player in the Indian cement industry and an integral part of the Adani Portfolio, we continue making strides in this direction with an innovative, holistic, and sustainable approach to nation building. Each step we take, each action, and each achievement is a gleaming reflection of our values – Courage, Trust, and Commitment. It is through the combined richness of these values that we continue to contribute to and remain steadfast in our proud position as a key contributor to the nation's growth story.

We have charted our own growth blueprint, implemented across the previous year, which attracted significant capital expenditure towards capacity-building, operational efficiency, and decarbonisation measures. In addition to this, and in line with our contribution to nation building, comes this voluntary disclosure encompassing our transparent nature - the Tax Transparency Report (TTR). The TTR outlines our tax and other contributions to the government and exchequer, further

reinforcing our value of commitment to the greater good.

This report elaborates on the direct tax contributions, indirect tax contributions, and other contributions from ACL, ACC, Bulk Cement Corporations Ltd., ACC Mineral Resources Ltd., Chemical Limes Mundwa Pvt. Ltd., MGT Cements Ltd., Ambuja Resources Ltd., Lucky MinMat Ltd., Singhania Mineral Pvt. Ltd., One India BSCPvt. Ltd., and Ambuja Shipping Services Ltd. This voluntary report is a testament to the transparent style of conducting business which is a key pillar for our operational excellence.

For the period of this TTR, during financial year 2022-23, the total Tax and Other Contribution of Ambuja Cements, along with its subsidiaries, stood at Rs. 1,33,608 million. Of this, Rs. 17,205 million went towards Direct Contribution, while Rs. 1,14,715 million went towards Indirect Contribution, and Rs. 1,688 million accounted for Other Contribution. Further details presented in the report include corporate taxes, government royalties, withholding taxes, and socio-economic securities among various other taxes and charges, while also showcasing our tax governance, approach to tax, and the processes thereof.

The level of transparency offered through this TTR sets an industry benchmark and aligns perfectly with our vision to be a **world-class leader in businesses that enrich lives and contribute to nations in building infrastructure through sustainable value creation. As we continue our journey of growth**, innovation, and business excellence, the goal of reaching 140 MTPA capacity by FY 2027-28 stays firmly in our sights, and together we shall continue to build on these and more achievements towards a bright, sustainable, and prosperous future.

Regards,

Ajay Kapur

**1,33,608**  
₹ Mn Ambuja Cements  
Limited (ACL)  
Tax & Other  
Contributions  
FY 2022-23

## Part 3: The Adani Portfolio

# About: Adani Portfolio

The multi-business Adani portfolio is one of the most dynamic infrastructure and utilities platforms in India.

**The robustness of the Adani platform draws extensively from its ethical foundation**

### 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 business

Engaged in nation building

#### Trust

We shall believe in our employees and other stakeholders

Enhancing stakeholder value

#### Commitment

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

Enriching communities of its presence

### Culture:

#### Passion

Performing with enthusiasm and energy

#### Results

Consistently achieving goals

#### Integration

Working across functions and businesses to create synergies

#### Dedication

Working with commitment in the pursuit of our aims

#### Entrepreneurship

Seizing new opportunities with initiatives and ownership

### The Chairman

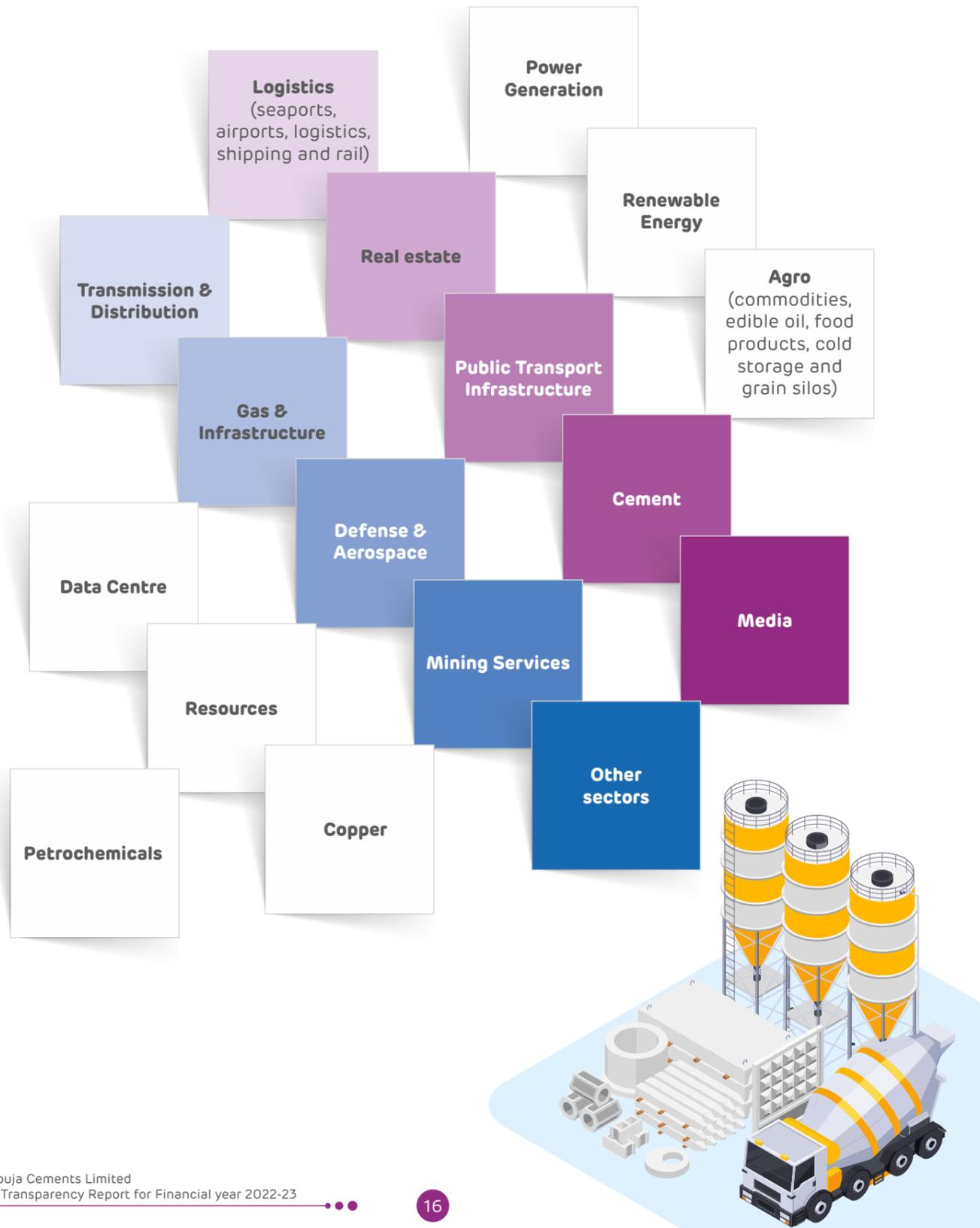
Adani Group's entry into the cement business was yet another step towards capitalising on market presence and building branded businesses that allow the Group to move closer towards the end consumer and lend greater credibility to the Adani brand name.

### The Adani Portfolio

The Adani portfolio has been promoted by the visionary industrialist Mr. Gautam Adani. The Adani Group was founded by him in 1988 with a commodity trading business under the flagship Adani Enterprises Limited (previously Adani Exports Limited)

Headquartered in Ahmedabad, India, the Adani portfolio is the largest and fastest-growing businesses in India with diverse interests.

## The Adani Portfolio



## The scale

Most Adani businesses lead their sectors in India.  
Adani Portfolio comprises of ten publicly traded companies

Adani Energy Solutions Limited is one of the largest private sector transmission and distribution company in India

Adani Ports and Special Economic Zone Limited is one of the leading private sector port operators in India

Adani Wilmar Limited holds the position of being India's one of the leading edible oil brands

Adani Enterprises Limited is India's leading business incubation company

Ambuja Cement (with subsidiary ACC Limited) is the second largest cement manufacturer of India and an iconic cement brand

Adani Power Limited is the leading private sector thermal power producer in India

Adani Green Energy Limited is among one of the leading renewable energy businesses in the world

Adani Total Gas Limited is one of the largest city gas distribution businesses in India

NDTV Limited is among India's most trusted media companies

### The positioning

The Adani portfolio has positioned itself as a leader in the transport logistics and energy utility portfolio businesses in India. This portfolio of companies has focused on sizable infrastructure development in India with operations and maintenance practices benchmarked with global standards.

### The core philosophy

The Adani portfolio philosophy is 'Growth with Goodness' for sustainable growth. The portfolio is committed to widen its ESG footprint with an emphasis on climate protection and increasing community outreach through Corporate Social Responsibility (CSR) programs woven around sustainability, diversity and shared values.

### The credibility

Adani portfolio companies comprises of four IG-rated businesses and is the only Infrastructure Investment Grade bond issuer from India.



## Key financial information

Amounts in ₹ Mn except employees

NO.	Listed company	Market capitalisation as on 31 March 2023	Consolidated revenue for FY 2022-23	Consolidated EBITDA for FY 2022-23	Consolidated PAT for FY 2022-23	Total dividend paid during FY 2022-23	CSR spends during FY 2022-23	Number of employees as on 31 March 2023
1	Adani Energy Solutions Limited	11,07,740	1,32,927	61,010	12,806	-	331	5,002
2	Adani Enterprises Limited	19,95,515	13,69,778	1,00,250	24,729	1,140	248	6,005
3	Adani Green Energy Limited	13,95,770	77,920	63,310	9,730	-	202	2,912
4	Adani Ports & Special Economic Zone Limited	13,64,992	2,08,519	1,28,330	53,927	10,929	314	3,052
5	Adani Power Limited	7,38,990	3,87,733	1,43,120	1,07,266	-	200	3,155
6	Adani Total Gas Limited	9,54,360	46,834	9,070	5,465	275	125	572
7	Adani Wilmar Limited	5,27,475	5,81,848	16,610	5,821	-	168	2,600
8	Ambuja Cements Limited	7,25,853	3,89,370	58,600	30,244	17,951	1,180	4,361
9	ACC Limited	3,13,079	2,22,102	22,560	8,852	10,892	455	5,472
10	New Delhi Television Limited	12,359	3,859	710	529	-	92	508
	<b>Total</b>		<b>34,20,890</b>	<b>6,03,570</b>	<b>2,59,369</b>	<b>41,187</b>	<b>3,315</b>	<b>33,639</b>

## About Ambuja Cements Limited

Ambuja Cements Limited, is one of India's leading cement companies and a member of the diversified Adani Group - the largest and fastest growing portfolio of diversified sustainable businesses. Ambuja, with its subsidiaries ACC Ltd. and Sanghi Industries Ltd has taken the Adani Group's cement capacity to 78.9 MTPA with 18 integrated cement manufacturing plants and 19 cement grinding units across the country.

Ambuja and ACC have been recognised among 'India's Most Trusted Cement Brands' by TRA Research in its Brand Trust Report, 2024 and among 'Iconic Brands of India' by The Economic Times. Ambuja has provided hassle-free, home-building

solutions with its unique sustainable development projects and environment-friendly practices since it started operations.

The company has many firsts to its credit - a captive port with six terminals that has facilitated timely, cost-effective and cleaner shipments of bulk cement to its customers.

To further add value to customers, the Company's innovative products like Ambuja Cement, Ambuja Plus, Ambuja Compocem and Ambuja Kawach as well as ACC Suraksha, ACC Concrete Plus, ACC Gold, ACC F2R, and ACC HPC are now enlisted in GRIHA product catalogue. These products not only fulfil important customer needs but also help in

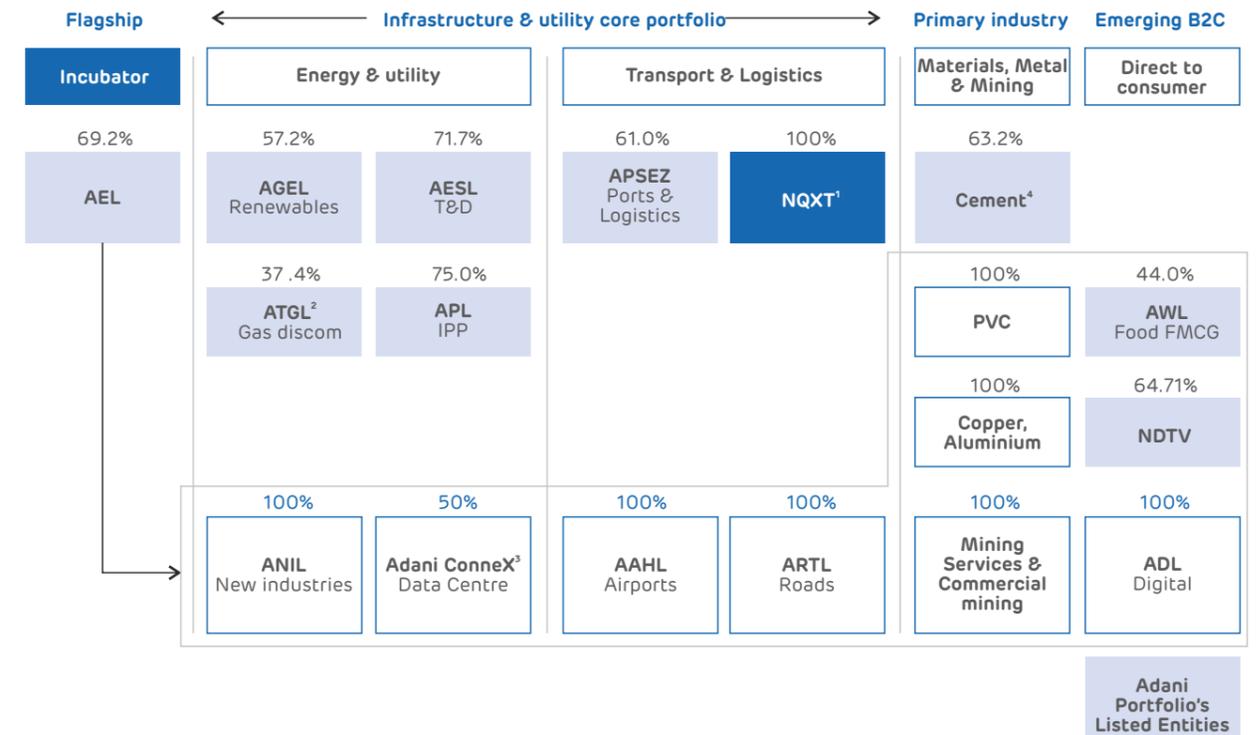
significantly reducing their carbon footprints.

Being a frontrunner in sustainable business practices, Ambuja Cements ranks among 'India's Top 50 companies contributing to inclusive growth' by SKOCH and 'India's Top 50 Most Sustainable Companies' Cross-Industry by BW Businessworld.

Established in 1936, ACC has 20 cement manufacturing sites, over 82 concrete plants and a nationwide network of channel partners to serve its customers. With a world-class R&D Centre, the quality of ACC's products and services, as well as its commitment to technological development, make it a preferred brand in building materials.

## Adani: A world-class infrastructure & utility portfolio

adani



(As of 31 March 2023)

(%): Promoter equity stake in Adani Portfolio companies  
(%): AEL equity stake in its subsidiaries

### A multi-decade story of high growth centered around infrastructure & utility core

1. NQXT: North Queensland Export Terminal | 2. ATGL: Adani Total Gas Ltd, JV with Total Energies | 3. Data center, JV with Edge Connex, AEL: Adani Enterprises Limited; APSEZ: Adani Ports and Special Economic Zone Limited; AESL: Adani Energy Solutions Limited; T&D: Transmission & Distribution; APL: Adani Power Limited; AGEL: Adani Green Energy Limited; AAHL: Adani Airport Holdings Limited; ARTL: Adani Road Transport Limited; ANIL: Adani New Industries Limited; AWL: Adani Wilmar Limited; ADL: Adani Digital Labs Private Limited; IPP: Independent Power Producer | 4. Cement business includes 63.15% stake in Ambuja Cement which in turn owns 50.05% in ACC Limited. Adani directly owns 6.64% stake in ACC Limited



# Environmental, Social & Governance initiatives

(ESG updates are as of 31<sup>st</sup> March 2024)

ACL has adopted holistic sustainability approach covering the three pillars of sustainability—people, planet, and profit—to emerge as the most competitive and sustainable company in the cement industry. This has helped us make strategic business decisions through a qualitative measurement of our impact on the environment and society. ACL has been able to identify a portfolio of cost-effective projects, reduce costs, increase earnings and subsequently contribute to stakeholder value. Our ESG goals provides a broad framework for strategic interventions to meet the challenges across four thematic areas — Climate, Circular Economy, Water & Nature, and People & Communities.

ESG is becoming increasingly important in today's business environment and for Enterprise Value creation. At Ambuja Cements Limited (ACL), ESG ambitions include the following:

## Environmental

- Committed to SBTi and GCCA for being Net Zero by 2050
- Strong commitment to Sustainable Development (SD) 2030 Plan
- Major investments in Renewable Energy and WHRS
- Focus on alternate fuels and raw materials to build circularity
- Focus on water positivity
- Focus on plastic negative
- Contribution towards 100 million tree plantation pledge by Adani Group
- Alignment with IBBI

## Social

- Talent acquisition, retention and development
- Spend on various social development program
- Outreach in 13+ states benefiting 2.5 million people through community development projects
- Focus on Agro based livelihood, Water conservation, Health & Sanitation, Women Empowerment, skill and entrepreneurship development etc.
- Safety at workplace
- Customer relationship
- Partnering with value chain partners

## Governance

- Policies to guide action
- Board Independence
- In addition to the statutory committees, there are additional committees/sub-committees represented by independent directors



## Awards & Accolades

- Ranked as 'India's Most Trusted Cement Brand' by TRA Research in its Brand Trust Report 2024, Winning the accolade for the second year in a row.
- Received 'Global Brand Excellence Award' in the category of 'Most Inspirational Social Media Campaign' for our stellar initiative, "Unbreakable Spirit of India".
- Recognised as the 'Most Engaging Loyalty Program' and felicitated with 'Loyalty Champion Award' at the DCX Digital Customer Experience Confex & Awards 2024
- International Safety Award 2024 by British Safety Council for excellence in workplace safety practices.
- Industrial Safety & Occupational Health Award by ICC & Govt of Odisha and Five Accolades for Environmental Excellence at 3rd National Sustainability Awards by Quality Circle Forum of India.
- Adani Cement felicitated with the prestigious 'Safety Excellence Award' at UPES Sustainability Fair 2.0
- ACC Limited recognized with 'Gold Award in 15<sup>th</sup> EXCEED OHS Award & Conference on 'Creating Safety Health & Environment protection culture in Indian Industry'
- Adani Cement's Bargarh Plant bagged Gold Award in 14<sup>th</sup> Kalinga Safety Excellence Award ceremony held in Bhubaneswar
- Ambuja Cements limited bagged Gold SKOCH Award for its project 'Ensuring water security through sustainable water management'.
- Ambuja Cements limited bagged Silver SKOCH Award for its project 'Co-processing plastic waste in cement kiln'.
- ACC Lakheri Plant won four awards in 37th Mines Safety Week

- held at Kolihan Copper Mines
- Ambuja Cement's Bhatapara Plant received APEX India 'OH&S Platinum Award' 2023
- ACC Limited awarded with 'Excellence Award in Coprocessing' at 13<sup>th</sup> Icon SWMCE & IPLA Global Forum 2023 for its sustainable Co-processing practices
- ACC Thondebhavi plant received two awards for environmental excellence and safety excellence at 3rd National Sustainability Awards
- ACC Sindri plant received two awards for environmental excellence and energy efficiency at 3rd National Sustainability Awards.
- ACC Jamul plant received award for environmental excellence at 3rd National Sustainability Awards.

## Our Targets

Our ESG goals provides the Company with a broad framework for its strategic interventions to meet the challenges across four thematic areas — Climate, Circular Economy, Water & Nature, and People & Communities.

To guide ESG ambitions, there are specific Goals and targets set by the company and Board committee reviews performance against these quarterly. The sustainability dashboard of ACL is summarized below.

Material Topic	Ambuja		ACC	
	2030 TARGETS	STATUS Q4 FY 24	STATUS TARGETS	STATUS Q4 FY 24
<b>Climate &amp; Energy</b> (CO <sub>2</sub> emissions - kg/T)	453	518	400	466
<b>Circular Economy</b> (use of waste derived resources MnT/yr)	21	8.6	30	12
<b>Water &amp; Nature</b> Fresh water consumption L/T of Cementitious material)	10x Water positive	11x Water positive	5x Water positive	1x Water positive
<b>People &amp; Community</b> (Number of beneficiaries- million)	3.5	3.27	3.5	1.4

## UN SDGs



There is a growing realisation that ESG forms a critical part of business and value creation. Tax is an integral part of each element of the ESG agenda - compliance with Environmental Taxes; changing attitude to tax behavior; increased transparency and robust tax governance structures to ensure tax policies reflect wider sustainability efforts.

## Tax to ESG Metrics

Environmental	Social	Governance
<b>Tax in the E</b>	<b>Tax in the S</b>	<b>Tax in the G</b>
<ul style="list-style-type: none"> <li>Environmental taxes</li> <li>Green subsidies and incentives</li> <li>Compliance and reporting requirements</li> </ul>	<ul style="list-style-type: none"> <li>Workforce wages and remuneration policies</li> <li>Flexible workforce and global mobility</li> <li>Healthcare insurance and pension premiums</li> </ul>	<ul style="list-style-type: none"> <li>Aligning ESG policy with tax behavior</li> <li>Tax reporting and stakeholder communication</li> <li>Process controls and compliance assurance</li> </ul>

# Part 4: Our Approach to Tax



## Introduction

At Adani portfolio, we consider tax as a material topic that plays a significant role in making economic and social contributions (sustainable development goals).

This commitment is aligned with our vision to be a world-class leader in businesses that enrich

lives and contribute to nations in building infrastructure through sustainable value creation.

We believe that companies are under an obligation to comply with prevailing tax legislations; the management owns a responsibility to stakeholders to address expectations of good tax practice.

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

### Approach to Tax

The fundamentals of our tax approach are outlined:

#### Fundamentals



### Compliances

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

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

of tax advisors whenever warranted to ensure a complete and timely compliance with applicable regulations.

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

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

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

## Disclosures and reporting

At ACL, we focus on transparency and standards related to disclosures / reporting on how tax matters are managed. This report is a validation of the commitment. As a policy, we disclose what is

required under law and extend beyond, setting a standard in terms of disclosures / reporting. We view appropriate disclosures and reporting as an opportunity to engage with key stakeholders. The

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

## Tax strategy

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

We track tax laws and concessions, seeking to optimise our tax exposure within available guardrails. Our tax planning is guided by a sense of integrity. The result is that we claim tax incentives/ deductions aligned with our strategy and which relate to investments and economic substance.

The international tax landscape has been rapidly evolving following

the inception of base erosion and profit shifting ('BEPS') project of G20/ Organisation of Economic Co-operation and Development. BEPS attempts to ensure that profits are taxed in the country of economic activity and value creation. India has been an extremely active participant in this regard.

All multinational corporations are impacted by changes in international tax framework as they operate across borders in multiple countries. Currently, under BEPS 2.0 - Pillar 1 and Pillar 2 are work-in-progress for implementation. Pillar 1 reallocates certain portion of the residual profits to the market jurisdiction, while Pillar 2 lays down a global minimum tax rate of 15% in the countries in which such

multinational corporations operate. While many jurisdictions are moving forward with the implementation of Pillar 2, consensus on Pillar 1 is uncertain. Be that as it may, Adani Group has proactively evaluated the implications under Pillar 1 and Pillar 2. This provides a greater certainty in terms of the tax impact and also leads to development of a robust tax function.

When ACL invests in a location, we seek to build long-term relationships with investors, respective governments, employees and local communities. The taxes we collect on behalf of the government and pay represent an important way in fulfilling this responsibility.

## Risk management and dispute resolution

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

This approach comprises tax risk analysis and aligns with governance best practices. Our tax governance framework

focuses on how tax risks are identified, managed, monitored and mitigated.

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

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

## Our tax risk management approach



**Risk assessment:**  
Continuously track changes in tax legislations and policies



**Self-assessment:**  
Invest controls and governance that prevent non-compliance



**Resource management:**  
Seek professional advice wherever the tax law is unclear



**Industry benchmark:**  
Examine approaches by peers related to tax risks management

## Related party transactions and transfer pricing

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

- The Adani portfolio is one of the most dynamic infrastructure and utilities platforms with a significant expertise across the value chain for infrastructure development. Its operation and maintenance practices are benchmarked to global standards. It assists portfolio companies to execute projects efficiently with in-house resources.
- When financial support is provided by the parent company to subsidiaries, the transfer price is determined considering factors like commercial expediency, envisaged cash flows, profitability, etc.
- Since Adani Group companies are built around adjacencies within businesses inter-se, there are synergies and business exigencies for inter-

company flow of goods and services, leading to related party transactions.

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

Based on this policy, the companies identify related party transactions and obtain approvals (e.g. Audit Committee) for these transactions. The Board of Directors reviews related party transactions and supporting documentation is provided to the Board of Directors to substantiate such transactions on an arm's length principle and in the ordinary course of business.

The Adani portfolio's transfer pricing framework covers

transfer pricing filings with the tax authorities. Such filings include country-by-country reporting and the master file. These filings transparently report the key business aspects (e.g. number of employees in a country, third party revenues, intra-group revenues) to the tax authorities. The transfer pricing documentation as specified under the income tax laws is maintained for related party transactions and such transactions are also undertaken on an arm's length basis, as required under income tax laws. To determine the arm's length price, a FAR (functions performed, assets employed and risks assumed) Analysis and benchmarking exercise is undertaken internally or externally (as considered appropriate).

This framework is directed to a standardized uniform practice across Adani Portfolio entities.

All transfer pricing tax filings are completed within statutory due dates

## Tax governance

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

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

ACL's macro-level tax governance structure comprises:

- Board of Directors
- Audit Committee, Risk Management Committee, Mergers & Acquisitions

Committee, Legal, Regulatory and Tax Committee

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



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

## Legal, Regulatory & Tax Committee

- Exercise oversight with respect to the structure, operation and efficacy of the Company's compliance program.
- Review tax matters that may have a material impact on ACL's financial statements and disclosures, reputational risk or business continuity risk.
- Review compliance with applicable laws and regulations.
- Review significant inquiries received from, and reviews by, regulators or government agencies, including issues pertaining to compliance with various laws.
- Consider and action tax risk management issues that are brought to the attention of the Committee.

## In-house tax team

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

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

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

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

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

## Our tax risk management approach



## Tax processes and controls

ACL's robust processes and controls address tax obligations, whether related to the payment of taxes or undertaking tax compliances. These processes comprise tracking and monitoring pending tax litigation and

necessary compliances required to be legally undertaken. It also includes real-time status monitoring.

Standard operating procedures are built for tax processes, with

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

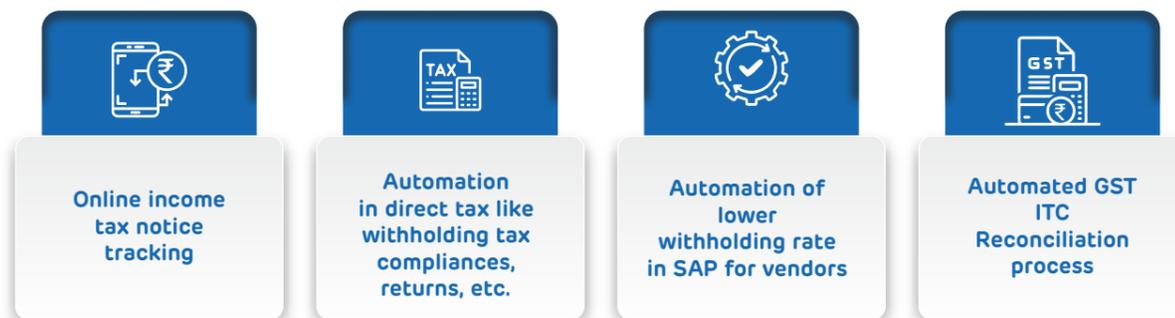


ACL increasingly leverages technology tools to supplement the human interface, helping automate tax processes. Extensive technology changes drive efficiencies related to tax aspects. A repository for the archival of historical and current tax data / documents has helped build a safeguard against subsequent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

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



### Illustrations of leveraging on tax technology:



### Advocacy

ACL has developed an advocacy framework leading to a constructive and transparent dialogue with governments and policymakers across all tax facets (policy, legislation and administration). These advocacy initiatives are engaged either directly by ACL or through

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

ACL identifies issues impacting

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

### Engaging with tax authorities

Our engagement with the tax authorities is transparent and co-operative. Our endeavour is to disclose relevant and complete facts to the tax authorities for their assessment. Our representations to the tax

authorities are typically undertaken by the external professional advisors engaged by ACL, supported by our proprietary tax team in line with our standard approach for representing /communicating

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





Part 5:  
**The numbers**  
What we have paid and under  
what heads

# Our contribution to the exchequer: Tax and other contributions

In the earlier section of this report, we have outlined our approach to tax to share the organisation's perspective towards tax. Further to the above, we have presented a summary of the Tax and Other Contributions made to the Indian Government during the financial year 2022-23.

These Tax and Other Contributions have been logged under the following categories:

### Direct contributions

include payments made by ACL and its subsidiaries directly to the Indian Government such as corporate tax, indirect tax borne, government royalty and other charges.

### Indirect contributions

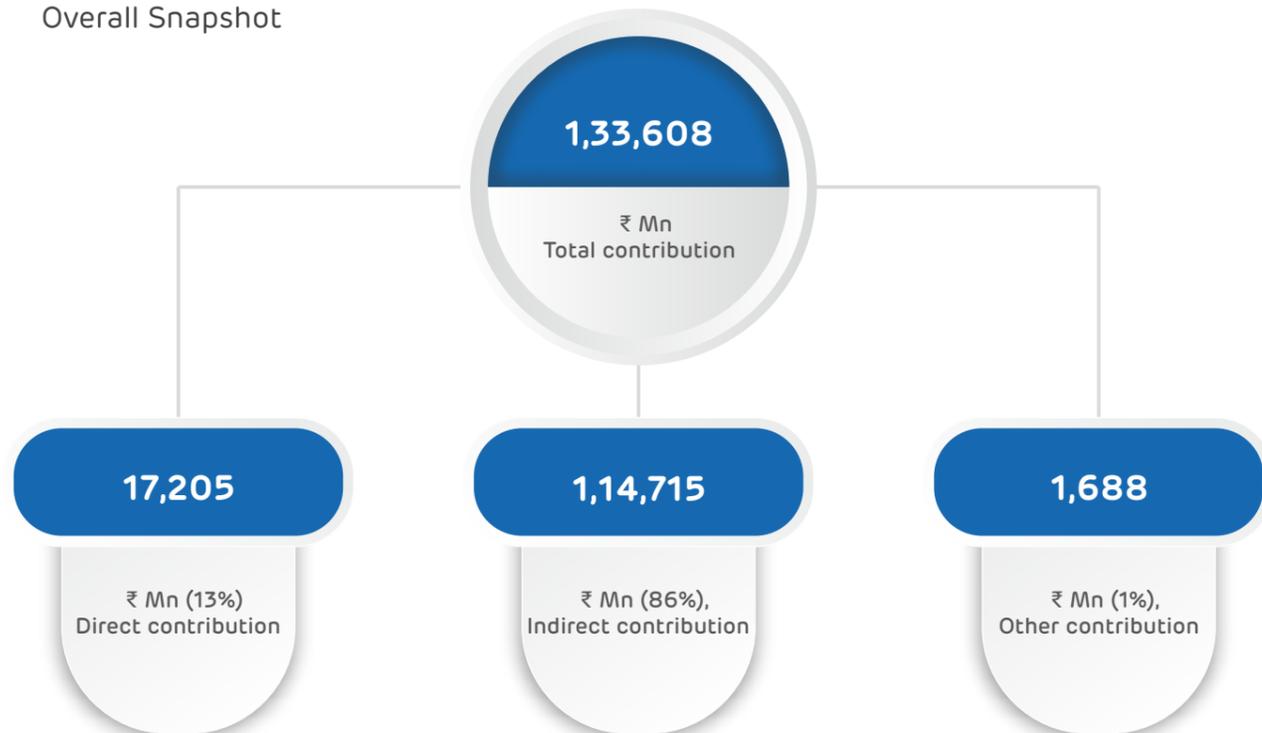
include payments made by ACL and its subsidiaries on behalf of other stakeholders such as withholding tax on vendor payments, withholding tax on payroll, Goods and Services Tax ('GST') on outward supply & Services, etc.

### Other contributions

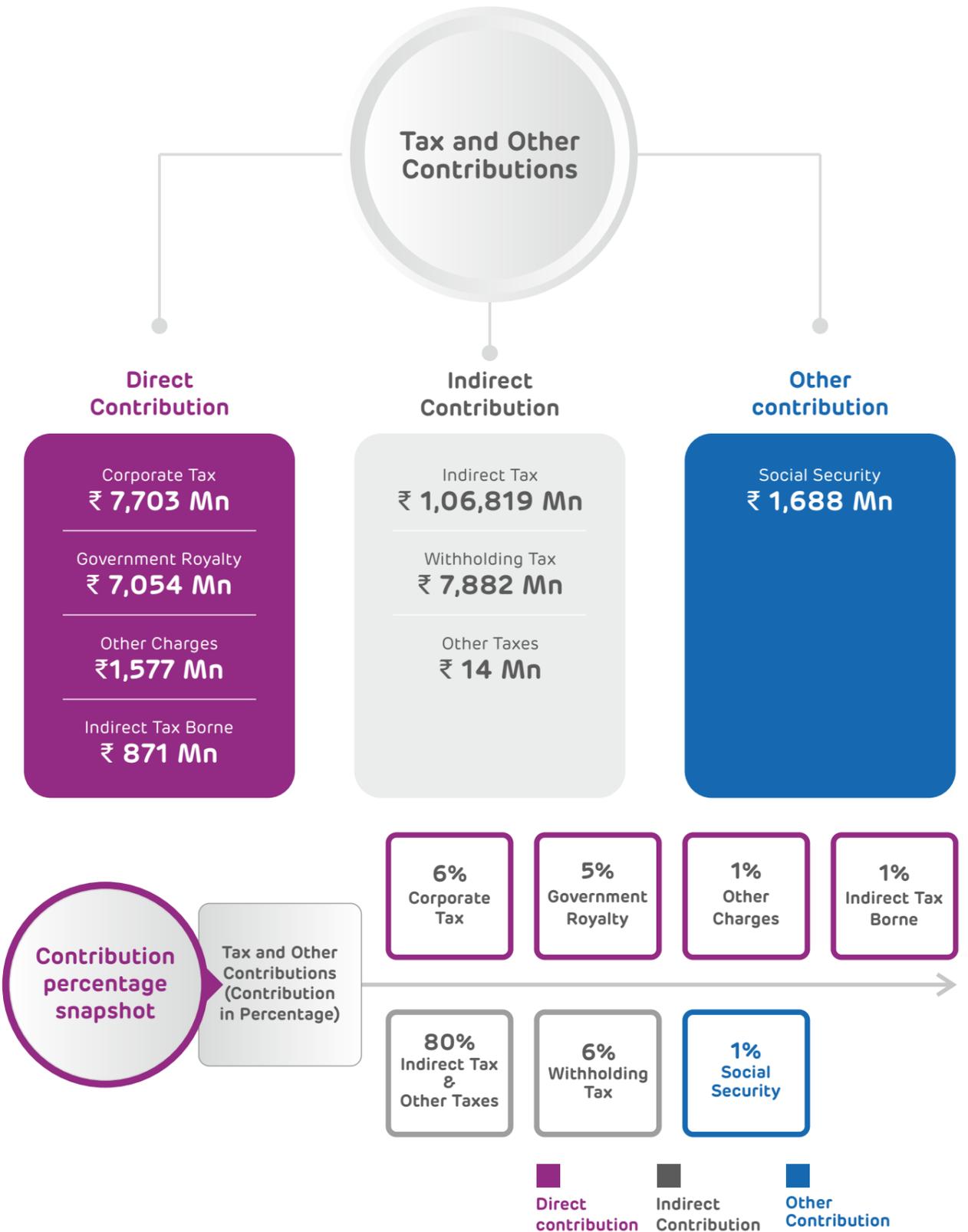
are non-tax payments made by ACL and its subsidiaries such as provident fund, pension scheme.

## Tax and other contributions

Overall Snapshot



## Contribution-wise snapshot



# The basis of preparation



This basis of preparation section provides the scope and methodology for the collection and reporting of data on the Tax & Other Contributions made directly and indirectly to the Indian Government. Such data is reported in the section "Contribution to Exchequer - Tax & Other Contributions".

The data reported is for the year from 1 April 2022 to 31 March 2023 and is based on the data used in the preparation of the Annual Report for the year ended 31 March 2023. We have reported the Tax and Other Contributions on a cash basis, unless otherwise mentioned. The base information used to compute the Tax and Other Contributions is the same as that for the audited financial statements of respective companies with inherent differences in the accounting methodology.

We have categorised the Tax and Other Contributions into following parts:

**Direct contributions:** It represents taxes, duties and other charges borne by ACL and its subsidiaries

**Indirect contributions:** It represents taxes and duties collected and paid on behalf of other stakeholders by ACL and its subsidiaries.

**Other contributions:** It represents social security contributed for the benefit of the employees.

We have reported the Tax and Other Contributions to the Indian Government, Ministries, Local Authorities, etc. by ACL and its subsidiaries. In this context, the Tax and Other Contributions made by companies incorporated in India have only been considered for the purposes of this report. Such contributions are reported at gross amounts. Further, Tax and Other Contributions paid to the Government(s) outside India are not forming part of this report.

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

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

## 1. Direct Contribution

### a. Corporate Tax on Income:

This represents the actual taxes paid directly on the taxable profits of ACL and its subsidiaries during the financial year 2022-23, including the taxes withheld by third parties while making payment to ACL and to its subsidiaries i.e., taxes withheld by the customers or taxes collected by the third party vendors.

Since these taxes are reported on a cash basis, it may also include the tax paid in respect of the income tax liability for earlier years at respective corporate tax rates applicable for those years, if those were paid during the financial year 2022-23. Typically, these taxes would be reflected in corporate income tax returns made to Indian Governments, and tend to become payable, and are paid, either directly by way of advance tax or self-assessment tax or through credit of withholding tax, either in the year the profits were made or up to one year later.

### b. Indirect Tax Borne:

This represents GST borne, custom duty and associated cess / surcharges.

### c. Government Royalty:

This represents concession fees paid to the Indian Government Authorities

### d. Other Charges:

This represents additional goods tax, environmental taxes, electricity duty, license fee, property tax, municipal tax and any other similar contribution by ACL and its subsidiaries.

## 2. Indirect Contribution

### a. Withholding Tax:

#### i. Payroll Taxes:

This represents taxes withheld from the salary payments made to the employees and deposited by ACL and its subsidiaries to the Indian Government. Typically, these taxes would be reflected in payroll tax returns made to the exchequer and tend to be payable, and are paid, on a periodic basis throughout the year.

#### ii. Suppliers and Vendors:

This represents taxes withheld by ACL and its subsidiaries on various payments made to the suppliers and vendors and deposited with the Indian Government on behalf of such a service provider.

### b. Indirect Tax:

This represents GST collected and paid to the Indian Government on a gross basis.

### c. Other Taxes:

This represents professional tax withheld and deposited with the Government.

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

## 3. Other Contribution

### a. Social Security:

Social security contributions are obligatory payments that entitle employees to receive a future social benefit such as Provident Fund, Employee State Insurance, which are solely for the benefit of employees. These contributions are made by employers and employees as mandated by regulatory authorities and such contributions include payments to provident fund account maintained by ACL and its subsidiaries.

The amounts reported as Tax and Other Contributions are based on the periodic forms, returns, challans and other relevant documents filed with the Indian Government authorities/maintained by ACL and its subsidiaries.

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

### Currency

Tax and Other Contributions disclosed in this report are in Indian National Rupees (₹) and are rounded-off to the nearest Million (Mn).

### Coverage

Please refer 38 for list of taxes and other contributions covered.

# Independent reasonable assurance report



To

## The Board of Directors of Ambuja Cements Limited,

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

## Report on the audit of the Tax and Other Contributions included in the Tax Transparency Report of Ambuja Cements Limited ('ACL') for the Financial Year 2022-23

We ('BDO India LLP' or 'BOO') were engaged by the management of Ambuja Cements Limited ('the Company') to report on 'Tax and Other Contributions' contained in the Tax Transparency Report of the Company and its subsidiaries for the financial year 2022-23, in the form of an independent reasonable assurance conclusion about whether ACL's statement that the Tax and Other Contributions is properly prepared, in all material respects, based on 'Basis of Preparation' attached to the Tax Transparency Report is fairly stated.

### Management's Responsibility

The management of the Company is responsible for the preparation and presentation of the Tax and Other Contributions for the financial year 2022-23 in accordance with the 'Basis of

Preparation' and for designing, implementing and maintaining such internal control as the management determines is necessary to enable the preparation and presentation of the Tax and Other Contributions for the financial year 2022-23 that is free from material misstatement, whether due to fraud or error. The management of the Company is also responsible for preparing the Basis of Preparation.

In preparing the Tax and Other Contributions for the financial year 2022-23, the management of the Company is also responsible for ensuring the efficient conduct of its business, including adherence to the Company's policies, the safeguarding of its assets, implementing and maintaining internal control, preventing and detecting frauds and errors, ensuring the accuracy and completeness of the accounting records and identifying and ensuring that it complies with the laws and regulations applicable to its activities.

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

### Independent Auditor's Responsibility

Our responsibility is to examine the Tax and Other Contributions prepared by the Company and to report thereon in the form of an independent reasonable assurance conclusion based on

the evidence obtained. We conducted our engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000: Assurance Engagements Other than Audits or Reviews of Historical Financial Information issued by the International Auditing and Assurance Standards Board, which requires that we plan and perform our procedures to obtain reasonable assurance about whether the Tax and Other Contributions for the financial year 2022-23 is properly prepared and free from material misstatement, whether due to fraud or error.

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

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

The procedures selected depend on our judgment, including the assessment of the risks of material misstatement of Tax and Other Contributions whether due to fraud or error. In making those risk assessments, we have considered internal

control relevant to the preparation and presentation of Tax and Other Contributions in order to design assurance procedures that are appropriate in the circumstances, but not for the purposes of expressing a conclusion as to the effectiveness of the Company's internal control over the preparation and presentation of Tax and Other Contributions. Our engagement also included assessing the appropriateness of the suitability of the Basis of Preparation used by the Company in preparing the Tax and Other Contributions in the circumstances of the engagement, evaluating the appropriateness of the procedures used in the preparation of Tax and Other Contributions and the reasonableness of estimates made by the Company and evaluating the overall presentation of the Tax and Other Contributions.

### Our opinion

In our opinion, the Tax and Other Contributions for the financial year 2022-23 is properly prepared, in all material respects, in accordance with the 'Basis of Preparation'. Our opinion has been formed on the basis of, and is subject to, the matters outlined in this report. This report is not issued under any statute/ law.

### Restriction on Use

In accordance with the terms of our engagement, this independent reasonable assurance report on Tax and Other Contributions has been prepared and issued at the request of ACL solely for inclusion in its Tax Transparency Report for the financial year 2022-23 and should not be used by any other person or for no other purpose or in any other context. We are appointed to only verify the Tax and Other Contributions in accordance with the Basis of Preparation shared with us and are not the auditors of ACL and BDO India LLP shall not be liable to the Company or to any other party for any claims, liabilities or expenses relating to this report. Any party other than ACL who obtains access to our report or a copy thereof and chooses to rely on our report (or any part thereof) will do so at its own risk. Accordingly, we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this report is shown or, into whose hands it may come without our prior consent in writing.

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

### For BDO India LLP

Place: Ahmedabad

Date: 29 April, 2024

# List of tax and other contributions covered

Direct Contributions	Indirect Contributions	Other Contributions
<ul style="list-style-type: none"> <li>• Corporate Income tax (including surcharge &amp; cess)</li> <li>• Goods &amp; Services Tax (borne)</li> <li>• Custom duty borne</li> <li>• Government Royalty</li> <li>• Additional Goods Tax</li> <li>• Electricity duty (borne)</li> <li>• Water Tax</li> <li>• License fee/Inspection fee</li> <li>• Municipal Taxes</li> <li>• Fees paid to Pollution Control Board</li> <li>• Environmental taxes</li> <li>• Motor Vehicle &amp; Road tax</li> <li>• Other Miscellaneous Taxes</li> </ul>	<ul style="list-style-type: none"> <li>• Withholding tax collected on salaries</li> <li>• Withholding tax collected on vendor payments</li> <li>• Tax collected at source on sale from customers</li> <li>• Withholding of Tax on Payroll</li> <li>• Professional tax</li> <li>• Goods &amp; Service Tax (collected &amp; paid)</li> </ul>	<ul style="list-style-type: none"> <li>• Employer's and Employee's Contribution to Provident Fund</li> <li>• Employer's and Employee's contribution to Employee State Insurance</li> <li>• Employer's and Employee's contribution to Labour Welfare Fund</li> </ul>

# List of entities covered

Sr. No.	Name of Entity
1.	Ambuja Cements Limited
2.	ACC Limited
3.	Bulk Cement Corporations Limited
4.	ACC Mineral Resources Limited
5.	Chemical Limes Mundwa Private Limited
6.	MGT Cements Limited
7.	Ambuja Resources Limited
8.	Lucky Minmat Limited
9.	Singhania Mineral Private Limited
10.	One India BSC Private Limited
11.	Ambuja Shipping Services Limited

**Ambuja Cements Limited**

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Ph +91 79-2555 5555  
[www.adani.com](http://www.adani.com)

**Ambuja Cements Limited**

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Andheri (E), Mumbai-400 059,  
Maharashtra, India  
Ph +91 22-4066 7000  
[www.ambujacement.com](http://www.ambujacement.com)

**ACC Limited**

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Shantigram, S. G. Highway,  
Khodiyar, Ahmedabad - 382 421,  
Gujarat, India  
Ph +91 79-2656 5555  
[www.acclimited.com](http://www.acclimited.com)