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AIR EMISSION MANAGEMENT POLICY
HEG GRAPHITE LIMITED

BACKGROUND

As part of the company efforts to deliver Sustainability vision, this policy sets out HEG Graphite Limited's approach to Air emissions management and outlines the requirements to avoid (or if not possible), minimize the adverse impact of its operations on the air quality. The Company has adopted 'Air Emissions Management Policy'.

There are several industrial processes that produce a range of air-polluting pollutants. While some of these emissions, like carbon dioxide and methane, have a direct link to the global problem of climate change, including smoke, dust, and fumes can result in a local environmental issue. However, there are some polluting emissions in the air (such as particulates, nitrogen oxides, ammonia, volatile organic compounds, sulphur dixode, etc.) which are responsible for a variety of national and regional impacts (such as acid rain, damage to the ozone layer, chronic human health issues, etc.) and therefore require effective management.

OBJECTIVE

In implementation of stated commitments of the company to prevent, abate and mitigate our emissions to air, we have adopted several initiatives towards which we will strive. These are supported by range of actions and improvements through which those are to be achieved.

DEFINITIONS

- 'Company' shall mean HEG Graphite Limited.
- 'Board' shall mean Board of Directors of the Company.
- 'Members' shall mean stakeholders of the Company who hold stake in the Company.
- 'Policy' shall mean Air emissions management policy.

POLICY

Size and nature of all polluting air emissions.

To achieve this, the company is required to undertake a detailed assessment of:

- All the air emissions from all its sites to determine the origin.
- The potential pollutants that each air emission may contain.
- Establish a regular and up-to-date monitoring programme for air emissions arising from the operations.
- The nature and scale of the 'receiving environments 'in terms of their susceptibility to the impacts of air pollution, engaging with local stakeholders whilst doing so.
- Air Quality Management Plan.
- Air quality compliance with the help of qualified persons and using any valid/accepted methods.

DEVELOPMENT OF PROGRAMMES

- Company is required to prevent or minimize the creation of air emissions through improved efficiency, the use of new technologies and changes in processes;
- Company should utilize new abatement technology and innovation to improve the process by which air emissions are treated on our sites, thereby improving the quality of any subsequent air emissions;
- Company should identify any adverse impacts associated with our air emissions and seek to mitigate these wherever possible.
- On a regular basis, company should monitor both the quantity and quality of air emissions it produces, as well as the quantities of any pollutants contained within those air emissions, to see how it is progressing, and it report this progress to its stakeholders.
- In addition, the company is committed to reducing our non-GHG air emissions and is actively engaged in a variety of methods for managing and monitoring air quality parameters such as particulate matter (PM), SOx, and NOx. The primary focus is on air quality prevention and management through operational discipline and process improvement.

STRATEGIES FOR MANAGING AND MONITORING AIR EMISSIONS

Strategies adopted by HEG Graphite for managing and monitoring air emissions entail the following:

- Usage of well-designed state of art air pollution control devices (APCD).
- Periodical inspection and maintenance of APCD.
- Effective fugitive emission management.
- Continuous emission monitoring and reporting.

PREVENTION OF THE AMOUNT OF POLLUTING AIR EMISSIONS

- The company should exploit existing opportunities to stop and reduce the levels of air pollutants at company's sites;
- The company should educate employees about the causes and effects of polluting air emissions so they can, with our assistance, minimize its own impacts both at work and, if possible, at home.
- The company is responsible to invest in research to develop new and innovative technologies within the industry that will help reduce polluting air emissions at its facilities.
- Reduction of the potential impacts of the air emissions through effectively treating and abating the emissions the company cannot avoid it will:
- Exploit existing opportunities to improve the efficiency and effectiveness of air emission treatment and abatement activities on our sites;
- Closely monitor the quantity and quality of our emissions to ensure defined limits are not exceeded;

PROMOTION OF AIR EMISSION PREVENTION, ABATEMENT AND MITIGATION

The company shall promote air emission prevention, abatement and mitigation across all its suppliers and business partners through:

- Defining and openly sharing in a Code of Practice the minimum standards it holds our suppliers and business partners to, in terms of air pollution prevention, reduction, and mitigation;
- Developing a detailed and transparent process for evaluating each supplier's and business partner's attitudes, risk profile, and performance on a range of sustainability issues, including air emissions;
- Encouraging suppliers and business partners whose attitudes and performance are most similar to goals and objectives of the company. The company should be intended to do everything possible to help to mitigate the effects of polluting air emissions across India.

STATUTORY AND VOLUNTARY OBLIGATIONS RELATING TO AIR EMISSIONS

These include:

- Montreal Protocol on Substances that deplete the Ozone Layer.
- All local and national statutory regulations relating to air emissions prevention, abatement and mitigation.
- Reporting of the performance on the issue of air emission.

Date of approval of the Board: - August 10, 2026