PROUD TO BE INDIAN
PRIVILEGED TO BE GLOBAL

CODE OF CONDUCT
HEG GRAPHITE LIMITED

SCOPE

The Code of Conduct is applicable to all employees of HEG Graphite Limited ("the Company"). It is also applicable to all suppliers, consultants, agents, sales representatives, distributors and independent contractors working with the Company for any specified period. In essence, anyone working on the Company's behalf is expected to act consistently with the Code.

PURPOSE

The main purpose of a code of conduct is to set and maintain a standard for acceptable behavior to all stakeholders in a company. This code of conduct is a set of standard social norms, regulations and responsibilities of each individual in the company. It is a reminder to the employees of what is expected from them. It further highlights that their actions should be `standards of honesty, integrity, ethical and law-abiding behaviour expected of all employees while also meeting the requirements of external stakeholders and applicable laws. In addition, it provides understanding of consequences and disciplinary actions if the conduct is broken.

RESPONSIBILITIES UNDER THE CODE

- **Responsibility of Employees:** It is the responsibility of each employee to be aware of and abide by the code of conduct elucidated in this document. Additionally, all employees also have the responsibility of behaving/acting in an ethical manner. Further, each employee is responsible for reporting any violations of the code they observe within the company to the appropriate authority.

- **Responsibility of Managers:** In addition to the above, Managers have an additional responsibility to drive a culture of integrity, honesty, ethical and law-abiding behavior among other employees in the organization.

CODE OF PERSONAL CONDUCT

- Honesty & Integrity: All employees are expected to demonstrate the highest standards of honesty and integrity in their conduct at all time while representing the Company and conducting business on behalf of the Company.
- Respect for all: All employees are expected to demonstrate respect and trustworthy behavior in their dealings with other employees as well as external stakeholders
- Team spirit: All employees are expected to uphold the spirit of team work and ensure that the best interest of the team and Company prevails at all times
- Substance Abuse: All employees are expected to maintain a drug-free environment at workplace and refrain from substance abuse of any form while performing your duty within premises or outside of it. Employees are also prohibited from selling, distributing, possessing or encouraging others to use controlled substances.

HUMAN RIGHTS

The Company is committed to uphold human rights and believes that all its employees, suppliers and stakeholders must live with social and economic dignity and freedom, regardless of nationality, gender, race, economic status or religion, Maintaining, promoting and protecting human rights are fundamental to how the Company operates its business and forms an integral part of our core value of Inclusive Growth. It is our constant Endeavour to establish a workplace as well as surroundings wherein people are treated with dignity and respect. We implement our human rights commitment through our Code of Conduct.

The Company's Human Rights Policy is aligned to the principles of human rights as enshrined in the Constitution of India, national laws and policies and International Bill of Human Rights. The Company recognizes that human rights are fundamental to sustainable development. The Company is committed to respecting the human rights of our workforce, communities and those affected by us.

Open door communication

The Company believes that the work environment should be free from any kind of bureaucracy and all employees must have access to other employees regardless of their position or influence in the company. All managers are expected to foster an open-door culture at the workplace.

ENVIRONMENT, HEALTH & SAFETY

The Company is committed to provide its employees a safe, healthy, and economically sound working environment. The company will take all possible measures to ensure health and safety of its employees.

Safety at workplace is also every employee's responsibility. All employees and visitors to the workplace must comply with safety norms/policies/standards as prescribed by the company and applicable law. All employees must ensure that noun safe act is committed at workplace.

Employees must also undertake all possible measures to eliminate any unsafe condition as soon as they become aware of it.

If an employee witnesses any unsafe act or unsafe condition, they should report the matter to relevant authorities at the earliest.

PERSONAL INFORMATION PRIVACY

The Company is committed to protecting personal information that is shared by employees during the course of employment, consistent with applicable data privacy laws, including the rules surrounding the collection, processing, use, transfer and disclosure of personal information.

It is expected that employees whose job responsibilities include the collection, modification, transfer, processing, storage or use of personal employee information will comply with the

applicable data privacy laws and other internal controls that protect this personal information.

CONFIDENTIAL INFORMATION

Unless required by law or authorized by their management, employees shall not disclose confidential information or allow such disclosure. The obligation continues beyond the termination of agreement. Employees must use their best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information.

CONFLICT OF INTEREST AND DUTY

The Company expects that all employees will conduct themselves in the best interest of the company at all times. They should avoid conflict of interest situations. Below are some of such situations that must be avoided.

- An employee of the Company shall not accept concurrent employment outside the company, with or without remuneration. This encompasses undertaking any consulting assignment, freelancing, directorship, or any position of responsibility. In case an employee intends to undertake any concurrent opportunity outside the company, prior approval from ED is required.
- An employee shall not employ a relative in the same department or in a position of financial influence.
- Employees are prohibited from conducting company's business with any relative, without prior approval from ED. So also, employees must refrain from developing/maintaining personal associations with stakeholders.
- Any other situation that hampers an employee's ability to take business decisions in the best interest of the company.
- Each employee must fully and frankly inform the Company of any personal or external business interest that may lead to an actual or potential conflict of interest or duty. The company will take appropriate steps to eliminate or minimize such conflict of interest at the earliest. In addition to this, employees must not exploit for their own personal gain the opportunities that are discovered through the use of corporate property, information or position.

PROTECTION OF COMPANY ASSETS & INFORMATION

Every employee must ensure appropriate use of company assets or company information including company property, computers & communication systems, financial information, business strategy, technology, intellectual property, brands, trademarks, or any other non-public information. The, misuse or destruction of company assets or company in formation shall be considered as misconduct and strict disciplinary action shall be initiated in such cases.

BRIBERY & CORRUPT PRACTICES

Employees shall not engage in any corrupt Practices including opening/accepting bribes or kickbacks or any other kind of improper payment including facilitation payments, giving false incentives, indulging in the /fraud,

Embezzling funds, indulging in personal money transactions or personal entertainment with vendors / suppliers

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USAGE OF INTERNET & EMAIL

Every employee is responsible for using the Company's assets and infrastructure appropriately, ethically, in a safe and secure manner and within the law. Following are the guidelines while using internet and email.

- Not to send offensive emails and messages to any person/group within or outside the company.
- Not to import any non-text file including files received as e-mail attachments onto your system without checking for viruses.
- Not to visit obscene or illegal material or any material that is offensive in any way.
- Not to download any unauthorized software. All software used by employees to conduct Company business must be appropriately licensed.
- Not to share any report, files, data or source code with any unauthorized person/group/organization through the internet.
- Not to use the email system to copy and / or transmit any documents, software or other information protected by copyright laws.
- Not to create email congestion by sending trivial messages or personal messages or copying e-mails to those who do not need to receive them.
- Not to transmit HEG propriety information like reports, files, data and source code to any unauthorized person, group or organization through email or any other tool.
- In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If employees are not sure that an email received is safe, contact IT department [Security Specialists.]

SOCIAL MEDIA

- If employees handle social media accounts or speak on company's behalf, employees must protect our company's image and reputation. Specifically, employees should:
- Be respectful, polite and patient.
- Avoid speaking on matters outside field of expertise when possible.
- Follow our confidentiality and data protection policies and observe laws governing copyrights, trademarks, and fair use.
- Coordinate with our [HR/Marketing/IT department] when employees' about to share any major-impact content.
- Avoid deleting or ignoring comments for no reason.
- Correct or remove any misleading or false content as quickly as possible.

CELL PHONE

- We allow use of cell phones at work. But, we also want to ensure that your devices won't distract you from your work or disrupt workplace. Employee should follow few simple rules:
- Use cell phone in a manner that benefits your work (business calls, productivity apps, calendars.)
- Keep personal calls brief and use an empty meeting room or common area so as not to

disturb your colleagues.

- Avoid playing games on your phone or texting excessively.
- Don't use your phone for any reason while driving.
- Don’t use your phone to record confidential information.
- Don’t download or upload inappropriate, illegal or obscene material using our corporate internet connection.
- Also, you must not use your phone in areas where cell phone use is explicitly prohibited (e.g. laboratories.)

INSIDER TRADING

- Our employees must not indulge in any form of insider trading nor assist others, including immediate family, friends or business associates, to derive any benefit from access to and possession of price sensitive information that is not in the public domain. Such information would include information about our company, our group companies, our clients and our suppliers.
- Employees should not trade in the shares of the company using sensitive information available with them. Those having access to sensitive information should not share any details with others who do not need this information.
- Employees should not discuss the details of our business and its plans with anyone outside the company, not even with family / friends.

DRESS CODE

- The general principle for adopting business casual dress is related to creating a positive image of the Company for our customers and colleagues.
- Employees are ambassadors of the Company; clothes should not cause embarrassment or have a negative impact upon the image of the Company.
- Employees representing the Company off-site with third party companies should wear the Company’s Uniform only (Business Formals).
- Our Company’s official dress code is Uniform provided by the company. This includes Dangri for shop floor workmen/ Shirt/ Trousers/ Shoes/ Raincoats/ Winter Jackets/ Uniform for other essential services etc.
- Clothing must be neat and clean, free of excessive wrinkles. Hair and nails should be clean and groomed as appropriate.

CONSEQUENCES FOR PROVEN VIOLATIONS

Violations of this Code, Company Policy or the law will attract disciplinary action—up to and including termination. Violation in any of these codes should be reported to Head–HR immediately. Violations also include any false allegations, regardless of whether they are made anonymously. Legal and ethical misconduct can also subject the individuals to fine, penalty and civil or criminal prosecutions.

AMENDMENTS

The company is committed to continuously reviewing and updating its policies and procedures.

Therefore, the company reserves its right to amend, alter or terminate this code at any time and for any reason, subject to applicable law.

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