PROUD TO BE INDIAN
PRIVILEGED TO BE GLOBAL

ENVIRONMENT POLICY
HEG GRAPHITE LIMITED

BACKGROUND

We at HEG Graphite Limited ("the Company") have formed this Policy to reflect our commitment to protect the environment as part of our efforts to fulfill our sustainability vision, promoting climate change resistance and preventing climate change.

We are conscious of the direct and indirect impacts of our operations on the environment. Our objective is to better manage these impacts such that, the risks to the environment, our stakeholders and our portfolios are minimized. This policy will serve as a framework for understanding and managing our environmental risks, impacts and opportunities. This policy is applicable to HEG Graphite Limited.

A "blanket" of greenhouse gases, including carbon dioxide, methane, nitrous oxides, and others, has formed around the planet as a result of human activities like the burning of fossil fuels (coal, oil, and gas), trapping solar heat and making the Earth warmer. This theory is now supported by an overwhelming body of scientific evidence.

If the right measures and appropriate policies are put in place, research and analysis indicate that significant reductions in GHG emissions are feasible at relatively moderate costs. This entails making significant use of market-based tools on a global scale to establish a price for GHG emissions, as well as better integrating climate change goals into pertinent policy domains like energy, transport, building, agriculture, or forestry, as well as other actions to expedite technological innovation and diffusion.

OBJECTIVE

The main business of the Company is graphite which accounts for 80% of the revenue; many of our manufacturing activities have the potential to impact negatively on the environment. We accord the highest priority to the protection of the environment and conservation of resources in our premises. This policy will serve as a framework for understanding and managing our environmental risks, impacts and opportunities. Our goal is to maintain our organization's commitment to environmental responsibility while making constant improvements in how we manage the environmental effect of our activities. This will be accomplished via an Integrated Environment Management strategy that emphasizes people, technology, and facilities with Management Commitment as the primary driver.

STEPS TAKEN TOWARDS PROTECTION OF ENVIRONMENT

- Protection of environment including prevention of pollution, sustainable use of natural resources and climate change mitigation from our activities, products, operations, and services.
- Ensure environmental safety of our activities and products by adhering to generally accepted and scientifically viable environmental safety standards.
- Create, implement, and maintain.
- Verify compliance with these standards through regular auditing.
- Assess environmental impact of all our activities and set continual improvement objectives and targets and review these periodically to ensure that these are being met at the individual unit and corporate level.

ENVIRONMENT POLICY

- Reduce waste, conserve energy, and explore opportunities for reuse and recycle.
- Involve all employees in the implementation of this Policy and provide appropriate training.
- Maintain and continually improve Environmental Management System to enhance environmental performance.
- Strictly observe environmental laws and follow our own standards.
- Working collaboratively with our customers, suppliers, and the surrounding community for environmental issues.
- Set mandatory standards and establish environmental improvement objectives and targets for HEG Graphite Limited as a whole and for individual units, and ensure these are included in the annual operating plans.
- Formally review environment performance of the company once every quarter.
- Review environment performance when visiting units and recognize exemplary performance.
- Continual improvement of the environmental performance of activities, services and products to prevent pollution.
- Continual reduction in the use of raw materials, consumables, and water by practicing 3R to ensure sustainable use of natural resources.
- Continual reduction in the use of energy to mitigate climate change.
- Promote environmental communication, awareness and specific environmental training whenever appropriate to all persons working under Company control.
- Ensure implementation of Company Policy on environment and compliance with Company environmental standards and the standards stipulated under relevant national / local legislation. When believed to be appropriate, apply more stringent criteria than those required by law.
- Sustain a high degree of environmental awareness through regular promotional campaigns and employee participation through training, safety committees, emergency drills etc.
- Ensure periodic audits to verify compliance with environment management systems and personally carry out sample environment audits to check efficacy of the systems.
- Report environmental statistics to HEG Graphite Limited Corporate Safety & Environment Group on a monthly basis.

NON-COMPLIANCE

Non-compliance of the relevant provisions of the Act and rules and regulations included therein, will attract the penal provisions as per the respective laws.

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