PROUD TO BE INDIAN
PRIVILEGED TO BE GLOBAL

EQUAL OPPORTUNITY POLICY
HEG GRAPHITE LIMITED

BACKGROUND

The company understands the importance of a diverse workforce. We are committed to provide equal employment opportunities and fostering an inclusive workplace and work culture in which all employees are treated with respect and dignity. All employment decisions are made solely on merit, qualification, and abilities with no regard for gender, race, religion, caste, ethnic origin, nationality, age, disability, birth, HIV status, family status, sexual orientation, union membership, marital status etc. This Equal Opportunity Policy (hereinafter referred as "Policy") is in accordance with the provisions of 'The Rights of Persons with Disabilities Act, 2016' ("hereinafter referred as Act") and the rules made there under. People or persons with disability, are hereinafter referred as "Differently Abled People".

OBJECTIVE

HEG Graphite Limited is an Equal Opportunity Employer and prohibits discrimination and harassment of any kind. The company is committed to the principle of equal employment opportunity for all employees and providing them with a work environment free of discrimination and harassment.

DEFINITIONS

Any words used in this Policy shall have the same meaning ascribed to it under the Act or rules made there under.

SCOPE

This Policy is applicable to all differently-able people, who include board employees, contractors, workers, consultants, temporary employees, trainees / apprentices, job applicants of our Company and its subsidiaries. It also covers those employees who acquire disability during their work tenure. This Policy also applies to all aspects of employment, be it recruitment, training, working conditions, remuneration, transfers, employee benefits and career advancement.

POLICY

Equal opportunity for differently-abled persons

The company is committed to ensure that the following is provided to differently abled people with an objective to ensure an inclusive and conducive working environment:

- The right facilities and amenities enabling them perform their duties;
- Accessibility to documents, communication and information technology systems;
- Any new facility/building that is built, renovated, leased, or rented should have the necessary infrastructure / facilities / amenities.
- Barrier free accessibility and availability of any assistive devices whenever and wherever required;
- Company's facilities, offices, events and meetings are all inclusive and held in easily accessible location for differently abled people;
- In order to ensure that differently abled people have the necessary facilities for any official travel, the Company shall provide the requisite support.

- Discrimination of any nature, towards differently abled people, is prohibited in all facets of employment, including recruitment, training, working conditions, remuneration, transfers, employee benefits and career advancement;
- No other employee/vendor should harass or discriminate any differently abled person at the workplace, and shall treat them with utmost dignity and respect at all times;
- All suitable positions are open for differently abled people. The hiring/recruitment/promotion is purely based on merit and evaluation of the skills and competence of the potential candidate. No candidate shall be denied an opportunity or discriminated in any way on mere grounds of disability.
- An employee, who acquires disability as result of or during the employment, is permitted to resume their previous work at the same level as before. The employee shall be shifted to some other post, with the same pay scale and service benefits, only if he/she is not suitable for the post he/ she were holding. Further the employee may be kept on a supernumerary post until a suitable post is available or until the employee attains the age of superannuation, whichever is earlier, if it is not possible to adjust the employee against any post.

RESPONSIBILITY

- The Company's HR-Department shall also ensure that there are no grounds of discrimination at the time of hiring, recruitment and/or training and there are appropriate facilities/amenities for differently abled people in the Company.
- The HR-Head shall ensure that trainings, working conditions, remuneration, transfers, employee benefits and career advancement opportunities are provided to differently abled people, in a fair and equitable manner and shall report to Plant Head in case of any discrimination found.

The Company shall maintain records containing the following particulars, namely:

- the number of differently abled people, who are employed and the date of commencement of their employment;
- the name, gender and address of differently abled people;
- the nature of their disability;
- the nature of work being rendered by differently abled people; and
- the kind of facilities being provided to them

The information that an employee shares about his/her disability should be kept confidential and shall be maintained in a separate file. Necessary information with respect to disability shall be provided to managers/supervisors /admin personnel etc. for allowing / providing any reasonable accommodation or facilitating necessary support as and when required. Government officials investigating compliance with the act should be provided necessary information, as and when required.

GRIEVANCE MECHANISM

Any aggrieved employee, who is differently abled, can raise their concern/grievance arising out of this Policy directly to the Chairperson of the Ethics Committee or to the Chief Internal Auditor. The Company shall ensure that reasonable opportunity is provided to the differently abled person, to effectively participate in the investigation process. The Company shall make best effort to

complete the investigation within the timelines prescribed under the Whistle Blower Policy.

On investigation, if the employee, against whom the complaint has been made, is found guilty of discriminatory behavior, he/she will be subjected to necessary disciplinary actions as per the rules of services.

During the investigation and thereafter, the Ethics Committee shall ensure confidentiality and protect the differently abled person who has raised a concern/grievance under this Policy, in good faith and without any malafide intention.

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