HEG GRAPHITE LIMITED

GRIEVANCE REDRESSAL POLICY

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HEG GRAPHITE LIMITED's Grievance Redressal Policy

I. Introduction

At HEG Graphite Limited (hereinafter referred to as ("**Company**"), we recognize that our operations impact a diverse group of stakeholders whose engagement is integral to our continued success and ethical standing. These stakeholders include, but are not limited to our shareholders, investors, employees, workers, suppliers, customers, other value chain partners, communities etc. Each of these stakeholders plays a vital role in our ecosystem, contributing to and being affected by the ways we conduct our business, both now and in the future.

The Grievance Redressal Policy ("**The Policy**") is designed to provide a transparent and accessible mechanism for our stakeholders to express any concerns or dissatisfaction they may have regarding our products, services, or practices. Whether grievance arises from misunderstanding, unmet expectations, or specific service experiences, HEG Graphite Limited is committed to addressing each complaint with fairness, responsiveness, and integrity. Through this Policy, we not only aim to resolve grievances effectively but also to treat them as valuable feedback, instrumental in refining our service quality, improving stakeholder relations, and enhancing overall operational resilience.

In alignment with HEG Graphite Limited's values and commitment to continuous improvement, this Policy endeavors to:

- Ensure every stakeholder has the right to register their grievance, either verbally or in writing, through convenient and accessible channels, including in-person, phone, email, and other digital platforms.

- Uphold a consistent and unbiased approach to managing all grievances, understanding that prompt and impartial handling is essential to safeguarding trust, reputation, and business integrity.

- Make this Policy readily available on HEG Graphite Limited's website, ensuring transparency and ease of access for all stakeholders.

- Inform stakeholders of the available escalation paths within our Company should they be dissatisfied with the initial response to their grievances, along with guidance on alternative redressal avenues as needed.

- Establish a strong and fair grievance redressal framework that upholds principles of equity and comply with all relevant laws, regulations, and industry standards.

Our goal is to foster a responsive, fair, and effective grievance resolution environment where stakeholder concerns are addressed in a timely manner, and resolution outcomes are shared with all involved parties, reinforcing accountability and transparency. This Policy reflects HEG Graphite Limited's commitment to ethical business practices and a stakeholder-centric approach, as we strive to build long-term, trust-based relationships with everyone who engages with us.

II. Objective

The Company has established this Policy to reinforce trust and transparency with all its stakeholders by providing an accessible, fair, and efficient mechanism for grievance resolution.

This Policy is not only aimed at addressing concerns in a timely and systematic manner but also seeks to foster a culture of open communication and accountability across the Company.

III. Scope and Applicability

This Policy applies to all the stakeholders of the Company (both internal as well as external) involved in HEG Graphite Limited's operations. The Policy is designed to ensure that all stakeholders are treated fairly and equitably while fostering an environment of accountability and continuous improvement.

IV. Definitions

- **"Complainant"** refers to an individual, group or an organization such as an employee or worker or any other stakeholder of HEG Graphite Limited that is affected or has reasonable grounds to believe that they have been adversely affected by business operations of the Company. The person who raises the grievance and the person who experiences it may differ. In this case, the ultimate complainant is the individual or person who represents a group or organization who directly experiences the grievance.

- "**Grievance**" refers to an issue, concern, problem, or claim (perceived or actual) that a stakeholder wants to be addressed by the Company in a formal manner. However, it does not include the following:

  - Grievances that are incomplete or not specific in nature;
  - Communications in offering suggestions;
  - Communications seeking guidance or explanation;
  - Grievances regarding change in share price due to market dynamics.

- "**Grievance Handling Mechanism**" refers to a structured process through which individuals or groups can formally raise concerns, complaints, or dissatisfaction related to actions, decisions, or behaviour within the Company or system.

- **"Respondent**" refers to an individual, group or an organization who is the subject of the reported grievance raised by a complainant.

- **"Stakeholders"** means both Internal Stakeholders as well as External Stakeholders.

  - "**Internal Stakeholders**" refers to individuals or groups within a business who work directly within the business, such as shareholders, employees and workers.
  - "**External Stakeholders**" refers to individuals or groups outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, service providers, other business partners, community, NGOs, regulatory authorities etc.

V. Grievance Handling Mechanism

1. For Shareholders / Investors:

The Policy is formulated to promote and provide services to the shareholders/investors and ensure the effective and timely resolution of their grievances. Its objective is to establish a prompt and efficient grievance redressal mechanism, fostering an investor-friendly environment.

- **Key Initiatives for Handling Investor Grievances:**

  The Company undertakes the following key steps, among others, to address the grievances of shareholders/investors:

  - The Company has appointed c as its Registrar and Share Transfer Agent ('RTA') to ensure faster and efficient provision of service to the shareholders / investors.

  - The Company has a designated Email ID investor.heggraphite@lnjbhilwara.com for handling shareholders / investors grievances on which shareholders / investors can send their queries / complaints. This email is included in all Company communications with shareholders/investors and is listed on the Company's website.

  - Executives in the Secretarial Department regularly monitor the designated grievance E-mail ID to check for new queries, complaints, or requests from investors/shareholders.

  - Upon receipt of a complaint or request, full details are promptly shared with MUFG Intime India Private Limited ("RTA") for resolving the queries on a priority basis.

  - The Secretarial Department gathers all relevant information regarding the complaint or request necessary for its proper resolution. It thoroughly reviews the details and commits to resolving the issue as promptly as possible.

  - Upon receipt of the required documentation and information, and after completing the necessary quality checks, the Company promptly resolves the investor/shareholder complaint or query in accordance with the service standards established with MUFG Intime India Private Limited ("RTA").

  - A periodic Status Report is obtained from MUFG Intime India Private Limited concerning requisite correspondences made with shareholders/investors and complaints handled/resolved, whether received directly by the Company or via RTA.

  - The status of received complaints, their resolution and any pending issues is presented at the Stakeholders' Relationship Committee and Board Meetings.

  - MUFG Intime India Private Limited, as the Company's RTA, is responsible for resolving investor/shareholder grievances and managing all other RTA-related activities. They are entrusted with delivering investor services efficiently and promptly.

  - Shareholder/Investor complaints received through the "Securities Exchange Board of India (SEBI) Complaints Redress System" (SCORES), Bombay Stock Exchange Limited, National Stock Exchange of India Limited, NSDL/CDSL, and Registrar of Companies (ROC) are regularly monitored and addressed timely.

  - If the grievance is not satisfactorily addressed by the Company, shareholders/investors may contest the responses through the Online Dispute Resolution Portal, a platform for resolving disputes arising in the Indian Securities Market. The relevant Circular issued by SEBI in this regard can be accessed on the

Company's website.

- Further, the Stakeholder Relationship Committee reviews measures taken by the Company for effective exercise of voting rights by shareholders/investors. In addition to the above, SRC reviews adherence to the service standards adopted by the Company in respect of services being rendered by the RTA, review of various measures and initiatives taken by the Company for reducing the quantum of unclaimed dividends and ensuring timely receipt of dividend warrants/annual reports/statutory notices by the shareholders/investors of the Company. The Stakeholder Relationship Committee is authorised to approve request for transmission of shares and issue of duplicate share certificates.

- **Classification of Shareholders/Investors Communication:**

  In line with the Policy adopted by the Company grievances/ complaints received from SEBI / Stock Exchanges / Depositories / ROC and RTA relating to the shareholders/investors shall be considered for the purpose of reporting to stock exchanges in accordance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

  The Company receives various correspondences from the shareholders/ investors relating to the shares, annual reports, dividends and ancillary matters. These communications may either be complaints or mere queries/ requests by the shareholders/investors.

  The Company follows a set of guidelines to classify shareholders'/investor's communications into general correspondence, requests, complaints, etc.

- **Communication from investors to be treated as requests:**

  - Correspondence w.r.t. change in address, nominees, etc.
  - Any communication/ suggestions/ enquiry about procedures.
  - Requests for information or documents related to the Company or its operations, as per statutory rights available to shareholders/investors.
  - Communications in relation to matters that are sub-judice.
  - Requests for a hard copy of the Annual Report.
  - Requests received before the due date for dividend payment.
  - Any communication/suggestion/enquiry about procedures for any action will be considered as a request/general enquiry and not a complaint.

- **Communication from shareholders/investors to be treated as complaints:**

  All the complaints received through statutory authorities like SEBI, Ministry of Corporate Affairs (MCA), ROC, Stock Exchanges and the following communication received directly by the RTA shall be considered as complaints for reporting purpose:

  - Non Receipt of Annual Report
  - Non Receipt of declared Dividend
  - Non Receipt of Demat Credit
  - Non Receipt of Exchange Certificate
  - Non Receipt of Duplicate Certificate
  - Non Receipt of Securities after Transfer / Transmission / Name Deletion / Change of Name etc.

- **Contact Details:**

S.No.	Name	Address & contact details
1.	**MUFG Intime India Private Limited ('RTA')**	Address: MUFG Intime India Private Limited,C-101,Embassy 247, LBS.Marg, Vikhroli (West),MUMBAI - 400083 Phone: 022 - 4918 6000 Website: https://in.mpms.mufg.com/ E-mail: mumbai@in.mpms.mufg.com
2.	**HEG Graphite Limited ('Company')**	**Registered Office:** Mandideep (Near Bhopal), Distt. Raisen - 462 046, (M.P.), **Corporate Office**: **Bhilwara Towers, A - 12, Sector - 1, Noida - 201 301 (U.P.),** Phone no. 0120-4390300 (Extn. 492) Website: www.heg-limited.com E-mail: investor.heggraphite@lnjbhilwara.com

For continuous engagement and sharing updates with shareholders/investors, the Company conducts investor meets or analyst meets or earning calls from time to time. The Company also publishes public notices wherever required in widely circulated newspapers.

2. For Employees and Workers:

HEG Graphite Limited is committed to pursuing its business objectives with the highest standards of professionalism, honesty, integrity, and ethical behaviour. The Company encourages and protects all employees and workers who wish to raise and report genuine concerns about unethical behaviour, suspected fraud, or violations of the Company's Code of Conduct.

HEG Graphite Limited places a high priority on the well-being of its employees and workers, offering various channels for them to raise grievances or concerns. Employees and workers can submit their grievances directly to their supervisors, Human Resources (HR) Head as per the reporting procedure of the Company.

For more serious matters, employees can utilize the Whistle Blower Policy or Vigil Mechanism, which is accessible on the Company's website.

The LNJ Bhilwara Group of which HEG Graphite Limited is part, is deeply committed to promoting gender equality and providing equal opportunities for women across all its companies. We prioritize creating a safe and respectful working environment where every woman is treated with dignity and respect. All members of the Group are expected to uphold these values through their actions, conduct, and behaviour.

To reinforce this commitment, the Company has established a dedicated Prevention of Sexual Harassment (POSH) Committee, which is responsible for addressing any issues related to sexual harassment. This underscores our commitment to handling sensitive matters with the highest level of care and attention. Any complaints regarding sexual harassment within the LNJ Bhilwara Group will be addressed and investigated by the "Internal Complaints Committee (Internal Committee / ICC)".

Grievances related to the POSH Act can be reported through the dedicated mechanisms outlined in the said Act. The Policy for the Prevention, Prohibition, and Redressal of Sexual Harassment of Women Employees and workers is also available on the Company's website.

3. For Customers

HEG Graphite Limited values its strong relationships with business clients and is committed to ensuring the highest level of customer satisfaction. Customers can reach out to us at mktg.heg@lnjbhilwara.com for any concerns or queries. The Company has established work instructions and a standard operating procedure (SOP) for resolving customer complaints. These processes are designed to address grievances effectively and efficiently, ensuring that customer concerns are handled promptly and to the highest standard.

4. For Communities:

HEG Graphite Limited is dedicated to actively engaging with local communities through its Corporate Social Responsibility (CSR) initiatives, focus group discussions, and direct interactions. If any community member encounters a concern, they can reach out to the HR Officer of the Company. The CSR Policy of the Company is accessible on the Company's Website.

5. For Value Chain Partners (Other than Customers):

HEG Graphite Limited values its strong relationships with value chain partners, including suppliers and other business partners, through on-site visits, personalized interactions, and surveys. Any issues or concerns raised by them are promptly addressed by the purchase teams. Value Chain Partners (other than customers) can reach out to us through the following channels:

- **Centralized email address:** Value Chain Partners (other than customers) can share grievances or queries via heg.mdp@lnjbhilwara.com .

- **Grievances Escalation Matrix:** We have a three-level escalation process to address concerns:

  - Concerned Buyer
  - Category Head
  - Head of Purchase

VI. Timely Closure

Grievances will be resolved within the time frame specified by the policy, which will vary depending on the severity of the issue and in accordance within timelines provided by statuary authority

VII. Non-Retaliation

All grievances and concerns will be handled with confidentiality to protect the privacy of complainants and respondents involved, unless disclosure is necessary for resolving the grievance. The Company fosters a culture that strictly prohibits retaliatory behaviour against the complainant in any form.

VIII. Monitoring and Review

The Company regularly reviews its grievance redressal processes through its Executive Director/HR Head and wherever required through Stakeholders Relationship Committee to ensure their effectiveness and transparency.

IX. Communication of the Policy

This Policy will be available on the Company's website at www.heg-limited.com

X. Review

- Any or all provisions of this Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued by the Government, from time to time.

- The Company reserves the right to modify, add, delete or amend any of the provisions of this Policy.