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HUMAN RIGHTS POLICY
HEG GRAPHITE LIMITED

OBJECTIVE

The objective of HEG Graphite Limited's Human Rights Policy is to affirm our steadfast commitment to the protection and promotion of human rights within our sphere of influence. We aim to conduct our business in accordance with the highest ethical standards, adhering to all relevant laws and international human rights principles. This policy provides a guiding framework for our decision- making and actions, ensuring respect for the dignity and rights of individuals and communities impacted by our activities.

SCOPE OF POLICY

This policy is applicable to all facets of our operations at HEG Graphite Limited, including our employees, direct activities, products, services, suppliers, and partners. It encompasses all individuals and entities that are directly or indirectly linked to our company, irrespective of their geographic location or the nature of their association with us.

GUIDELINES

Statement of Commitment to Respect Human Rights

HEG Graphite Limited is committed to respecting human rights of all our stakeholders in alignment with the International Bill of Human Rights, United Nations Universal Declaration of Human Right and International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We are resolutely committed to ensuring that we do not contribute to violation of human rights. We take proactive steps to prevent or mitigate adverse human rights impacts associated with our business activities.

We specifically commit to preventing and respecting the following rights:

- Child Labour: We show zero tolerance towards any instance of child labour, we have in place mechanisms to prevent any instances of child labour and educate our suppliers (in accordance with process mentioned under SA8OOO) on the same to ensure our operations as well as supply chain follow practices on zero tolerance of child labour. We are committed to ensure that our business and supply chain reflects our values and respect for human rights. Further, we strive to improve our practices to combat modern slavery and human trafficking.

- Forced Labour: We oppose the use of forced labour and also work with subcontractors as well as suppliers to prevent incidents of forced or compulsory labour since these are against the basic human rights of an individual. No employee is made to work against his/her will or work as bonded/forced labour, or subject to coercion of any type related to work.

- Human Trafficking: HEG Graphite Limited strictly prohibits human trafficking in any form within our operations and supply chain.

- Freedom of association and Right to Collective Bargaining: With a view to promote constructive dialogue between the management and employees, we respect the right to freedom of association as well as the right to collective bargaining through representatives according to applicable laws, We are committed to bargaining in good faith with such

representatives. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. Empowering women rights and enabling opportunities: We understand that women across the globe face discrimination and lack access to education and healthcare. Women in many areas are deprived of basic rights and often become the victims of poverty, violence and ill health. We believe that women rights and economic inclusion are priorities for our success; therefore, it's our Endeavour to make women an inclusion in our businesses; empower them with opportunities in skill development as well as provide access to health care. Our approach starts with the respect of women s rights at workplace, their growth and provides avenues to develop their skills.

- Respecting human rights in the communities we work-in: We work in communities to drive a positive change and foster development, through this process, it has always been our Endeavour to work on issues that violate human rights; help address the root causes and influence a change that reflect equality and ensures human rights are respected. We ensure that each employee is made aware of this policy through various channels viz. presentation during on-board induction training, consent mechanism during performance review, presentations and at other such trainings and programs.

- Equal Opportunities for employment: HEG Graphite Limited is an equal opportunity provider and does not discriminate against any person because of their gender, caste, religion, age (within statutory limits), marital status, nationality, ancestry, ethnicity, geographical origin, sexual orientation, disability or any other trait protected by law, with respect to any terms of employment such as hiring, promotion, transfer, compensation & benefits, career development opportunities, etc. It is expected that managers shall take employment related decisions based only on the merit of the person and not discriminate against any person because of their personal characteristics/traits.

- Workplace free of harassment: HEG Graphite Limited recognizes and respects the right of every employee to a harassment free workplace. Hence, employees are expected to ensure a healthy, safe and conducive work environment that is free from harassment of any kind or form (sexual or non- sexual). Towards this, employees are prohibited from indulging in harassment of any kind or form-whether physical, verbal, psychological, or sexual in nature. This includes all types of unwelcome, offensive, demeaning and intimidating behaviours, whether explicit or implicit. The Company sets a standard of 'zero tolerance' for harassment. We are all responsible for ensuring that we avoid actions or behaviour that are, or could be, viewed as harassment. The Company views all incidents of 'sexual harassment', very seriously and encourage employees to report any incidents of sexual harassment to the Internal Complaints Committee (ICC) known as Prevention of Sexual Harassment (POSH) Committee formed under Sexual Harassment of Women at Workplace (Prohibition, prevention and Redressal) Act, 2013. We provide training for all employees on discrimination and harassment in the workplace. The Company management may initiate strict disciplinary action against employee found guilty of any kind of sexual harassment.

- Workplace free from violence: HEG Graphite Limited will not tolerate workplace violence in any form either within premises or outside where company related activities are carried out. Employees are expected to not indulge in workplace violence. They must not encourage others towards it as well. Employees are also prohibited from possessing weapons or dangerous items at work place or outside while conducting business activities.

POLICY COVERAGE

Requirements for Our Own Operations

- HEG Graphite Limited will integrate human rights considerations into our business strategies, policies, and procedures.
- We will provide training and resources to our employees to ensure effective implementation of this policy.
- We will establish due diligence processes to identify, prevent, mitigate, and account for our human rights impacts.

Requirements for Our Suppliers

- We expect our suppliers to uphold the same human rights standards as we do, reflected in our contracts and agreements.
- We will conduct regular assessments of our suppliers' compliance with this policy and address any non-compliance appropriately.

GRIEVANCE MECHANISM

We are dedicated to averting any infringements of human rights and offer our employees, vendors, and suppliers a safe, round-the-clock channel to voice concerns and confidentially or anonymously report any violations of the Human Rights Policy via the Ombuds process.

EXISTING POLICIES

This Human Rights Policy is a dedicated and standalone document that builds upon the principles already established in HEG Graphite Limited's Code of Conduct. It is designed to complement our existing Human Trafficking Policy and the suite of compliance policies we uphold. Together, these documents form a robust and cohesive structure that underscores our unwavering commitment to the protection and advancement of human rights across all facets of our business operations

AMENDMENT

Any modifications to the policy require CSR & ESG committee approval. The Board will review and update this policy every fourth quarter during its meeting. The Board holds the right to withdraw or amend any portion of the policy, or the entire policy, at any time as it sees fit.

COMPLIANCE

The Chief Sustainability Officer (CSO) shall be responsible for supervising the Policy. Additionally, the Policy will be governed by a Board-level CSR & ESG committee. Any queries regarding the Policy should be referred to the authorized spokesperson.

INTERPRETATION

In any circumstance where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this policy.

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