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HUMAN TRAFFICKING POLICY
HEG GRAPHITE LIMITED

SCOPE AND PURPOSE

HEG Graphite Limited is committed to work environment that has no place for human trafficking and slavery to which this policy has been committed. The Company should uphold ethical and legal standards while pursuing its objectives. The company is committed to protect Human Rights and prohibit all acts of slavery, domination, forced and compulsory labour, child labour & human trafficking.

This policy shall apply to all establishments of HEG Graphite Limited and each employee shall be made a partner in implementing the policy.

DEFINITION

The term "Slavery" can take many forms; it is a complex and multi-faceted problem.

- **Slavery:** where ownership is exercised over an individual
- **Servitude:** involves the obligation to provide service imposed by coercion.
- **Forced and compulsory labour:** all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- **Human trafficking:** involves arranging or facilitating the travel of another with a view to exploiting them.
- **Child labour:** which is illegal and it involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

POLICY STATEMENT

This policy is strictly prohibits engaging in human trafficking activity, which includes, using force, fraud, or coercion with subject to involuntarily malting any individual to participate in the act of obtaining labour from a person by threats of serious harm to that person or other.

RESPONSIBILITIES UNDER THIS POLICY

Following are the measures that should be exercised by the company with reference to this policy:

- Destroying or otherwise denying access to an employee's identity should be prohibited.
- Using misleading practices to recruit employees, such as failing to disclose key terms and conditions of employment shall be considered fraudulent and unethical.
- The Company should not fail to provide return transportation to certain employees who are brought to a country for the purpose of working to other location.
- The Company should ensure slavery and human trafficking is not taking place and should be responsible towards its employees and its customers seriously.
- The company must conduct mandatory trainings through various forums and workshops for its suppliers and employees on anti-slavery and anti-human trafficking.
- The Company must conduct risk assessments to determine which parts of the business and which supply chains are most at risk from slavery so that efforts can be focused on the areas that are most 'at risk'.

- The company is committed against and prohibits the practice of employing children.
- If any person above the age of 15 years but below the age of 18 years is employed at the company, the company shall undertake measures prescribed under applicable law in respect of employment of such persons with respect to working hours, overtime, weekly holidays and health & safety. The company shall maintain a register for such employees.

DISCIPLINARY ACTION

- The Management reserves the right to disallow benefits under these rules to any eligible employee at its sole discretion.
- This Policy shall take over all other policies, procedures, instructions, practices, rules and written or verbal representation to the extent they are found inconsistent.
- If any person employed or engaged with the company is found to be soliciting employment of any child against prescribed measures as in the case of any employee above the age of 15 years but below the age of 18 years, the company shall take disciplinary action against such persons.

NON- RETALIATION POLICY

HEG Graphite Limited do not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy or who assists with an internal or external audit or investigation. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, including potential termination of employment.

MANDATORY REPORTING REQUIREMENTS

Employees who become aware of and/or suspects potential violations of the Human Trafficking Policy, Child Labour and Anti-Slavery policy or any other related rules and regulations should immediately report to the concerned person so that violated acts can be reviewed and addressed in an ethical and timely manner. The company can anytime take necessary decision related to further reporting and addressable of the violated acts.

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