PROUD TO BE INDIAN
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OMBUDS POLICY
HEG GRAPHITE LIMITED

BACKGROUND

HEG Graphite Limited (hereinafter referred to as "the Company") is committed to the standards of transparency, probity, and accountability. An important aspect of accountability and transparency is a mechanism to enable anyone dealing with the Company to voice concerns in a responsible and effective manner. If any person working with the Company finds about information that, in his or her opinion, indicates serious misconduct, impropriety, abuse, or malpractice should expose it without fear of retaliation. However, they may ignore such concerns or dismiss them as mere suspicions or disloyalty to their colleagues, managers or to the Company itself. Also, they may not be aware of the appropriate procedure or the internal authority to whom the concern must be raised.

SCOPE AND OBJECTIVE

This policy has been introduced by the Company to enable any person dealing with the Company to raise their concerns about any malpractice, impropriety, abuse or wrongdoing at an early stage and in the right way, without fear of victimization, subsequent discrimination or disadvantage. The Company will not tolerate any harassment or victimization (including informal pressures) of/against the disclosing person and will take appropriate action to protect the individual when he/ she raise a concern in good faith. The company assures that such concerns would be enquired into by designated persons/committees independently and fairly.

POLICY AND PROCEDURE

- Malpractice, Impropriety, Abuse or Wrongdoing

Malpractice, impropriety, abuse and wrongdoing can include different issues as listed below. However, this is not a comprehensive list but is intended to illustrate the sort of issues, which may be raised under this policy.

- Any unlawful act, whether criminal or a breach of the civil law
- Breach of any Policy or Manual or Code adopted by the Company
- Health and safety risks, including risks to the public as well as other employees.
- Abuse of children.
- Deterioration of the environment
- Fraud and corruption
- Failure to comply with legal or statutory compliances either for and on behalf of the Company or in any personal capacity in the course of discharging duties of the Company.
- Financial malpractice

- Misuse of power
- Any fraudulent conduct.

- Disclosure of a Concern

Any person who intends to make any disclosure of a Concern is required to disclose all material information regarding the Concern in a signed document; not later than one-year of the day on which he/she knew of the Concern. The concern should be disclosed to the Global Ombudsman, who will be appointed for all the regions.

- Who will investigate into the Concern?

The Concern should be disclosed through E-mail or telephone, fax and is investigated by the Ombudsperson.

- Who will take decision?

A decision vis-à-vis the Concern disclosed shall be taken by the Regional Ethics Committee comprising of the following persons:

- Chief Financial Officer
- Business Unit Head
- Chief Legal Officer

- Procedure for handling the disclosed Concern

Following any revelation of a concern, the Global Ombudsman to whom the disclosure was made must take the actions listed below:

- full details and clarifications of the complaint.
- Consider the involvement of the Company's Auditors or the Police or any other external investigation agency or person.
- Fully investigate into the allegation with the assistance where appropriate, of other individuals / bodies.

A report is prepared and is submitted the same to Regional Ethics Committee, as the case may be, not later than 15 days from the date of disclosure of Concern. Whilst the purpose of this policy is to enable the Company to investigate Concerns raised by the people external to the company, but doing business with us and take appropriate steps to deal with it, the Company will give them as much feedback as the Company can. The Company may not be able to inform the complaints of the precise action the Company takes where this would infringe a duty of confidence owed by the Company to someone else. The Company will take steps to minimize any difficulties, which the complaints may experience as a result of raising the Concern.

Thus, if the employee is required to give evidence in criminal or disciplinary proceedings the Company will arrange for the complaints to receive advice about the policy revision, procedures, etc.

- Appeal against the decision

If the Complainant or the person complained against, is not satisfied with the decision, then either of the parties could prefer an appeal against this decision before the Ombudsperson and the decision of the ombudsperson in the matter will be final and binding on all the parties and the same needs to be reviewed by a member of the ethics committee.

- Unspecified Allegations

The complainant put his/her name to any disclosures he/she makes. Concerns that are unspecified are much less credible, but they may be considered for further action at the sole discretion of the Company. The factors to be taken into account will include:

  - The seriousness of the Concern raised
  - The credibility of the Concern
  - The likelihood of confirming the allegation from attributable sources

- Untrue Allegations

If the complainant makes an allegation in good faith, which is not confirmed by investigation, no action will be taken against him/her. While making a disclosure the employee should exercise due care to ensure the accuracy of the information.

- Maintaining confidentiality of the Concern as well as the disclosure

The complainant raising the Concern to whom the Concern has been raised or any person involved in the investigation shall maintain confidentiality and shall not disclose the concern or the internal proceedings with any outsider.

COMPLAINTS OF RETALIATION AS A RESULT OF DISCLOSURE

Employees who believe that they have experienced retaliation for raising a concern in accordance with this policy may submit a written complaint to the Global Ombudsman at manish.gulati@lnjbhilwara.com, asking for the appropriate solution.

For the purposes of this policy, an adverse personnel action is defined as a disciplinary action, an escalated complaint to senior management of the complainant company, a decision not to hire for business, a decision not to conduct business, a contract termination, or an unfavorable change to the general terms and conditions of a contractual relationship.

NON-COMPLIANCE

If a person, against whom the concern is raised, is found guilty, then the Company shall take appropriate action as per the Company's disciplinary policy.

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