Policy
Prevention, Prohibition and Redressal against Sexual Harassment of Women Employees

The protection against sexual harassment and right to work with dignity are universally recognized human rights, and HEG GRAPHITE LIMITED strongly believes in and is committed to providing equal opportunity to women in the employment, safe working environment, due respect and dignity during their association with any of its Group Companies. Therefore, everyone in the Group is expected to accord due respect and dignity to the women through their acts, conduct and behavior.

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, have come into force, w.e.f. August 10, 2026 and Rules made there under have also been notified from the same date.

Therefore, keeping the above in view, HEG Graphite Limited has finalized its formal policy for implementation on Prevention, Prohibition and Redressal against Sexual Harassment of Employees of all its Group Companies as under:

1. OBJECTIVE:

The objective of this policy is to provide protection against sexual harassment and mechanism for prevention and redressal of complaints of sexual harassment and for matters connected or incidental thereto of women employees of HEG Graphite Limited at work place.

2. PURPOSE:

2.1. The purpose of this policy is to communicate that HEG Graphite Limited has a "zero tolerance" approach towards sexual harassment to women at workplace.

2.2.. The policy actively advocates the right of every HEG Graphite Limited Women employee to work in an environment free of all forms of sexual harassment – verbal, written, physical, visual or otherwise.

3. SCOPE:

3.1. The policy covers all Women employees of HEG Graphite Limited as specified in Clause 4.1

3.2. For those employees of HEG Graphite Limited work with, its agents, trade partners, vendors, consultancies and any other firm that are associated with or form a part of the HEG Graphite Limited, Guidelines are as per **Appendix I**.

4. DEFINITIONS:

4.1. "HEG Graphite Limited" shall mean and include all Group Companies, operating locations and offices /branches.

4.2. "Employee" means a person employed at a work place of the HEG Graphite Limited for any work on regular, temporary, ad hoc or daily wages basis either directly or through an agent, including a contractor, with or without the knowledge of principal employer (HEG Graphite Limited), whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.

4.3. "Sexual harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:-

(i) Physical contact and advances; or
(ii) A demand or request for sexual favours;or
(iii) Making sexually coloured remarks; or
(iv) Showing pornography; or
(v) Any other unwelcome physical, verbal conduct of sexual nature:
(vi) Further, The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

(a) Implied or explicit promise of preferential treatment in employment; or
(b) Implied or explicit threat of detrimental treatment in employment; or
(c) Implied or explicit threat about present or future employment status or
(d) Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
(e) Humiliating treatment likely to affect health or safety.

4.4. "Workplace" includes:-

(a) any premises, location, establishment, offices, branches or units established, owned, and controlled by company.

(b) Places visited by employee arising out of or during the course of

employment, including transportation provided by the employer for Undertaking such journey.

5. INTERNAL COMPLAINT COMMITTEE (Internal Committee - ICC):

Sexual harassment complaints at HEG Graphite Limited shall be addressed to and investigated by the members of the "Internal Complaints Committee" (Internal Committee / ICC).

The Constitution, tenure of ICC is as per **Appendix II.**

The Draft Office Order Constituting ICC is as per **Appendix II-A.**

The Internal committee is responsible for:

- Receiving complaints of sexual harassment at the workplace.
- Initiating and conducting inquiry as per the established procedure.
- Submitting findings and recommendations of inquiries.
- Coordinating with the employer in implementing appropriate action.
- Maintaining strict confidentiality throughout the process as per established guidelines.
- Submitting annual reports in the prescribed format.

6. COMPLAINT

6.1. Any aggrieved women may make, in writing, a complaint of sexual harassment, at workplace to the internal Complaints Committee within a period of 3 months from the date of incident and in the case of a series of incidents within 3 months from the date of last incident. But, it is expected that any such matter must be reported as early as possible to the ICC without any delay in the larger interest of justice.

6.2. Provided, the Internal Complaints Committee may for reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period.

6.3 Where the aggrieved woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by her Coworker.

6.4. The complainant must ensure that the complaint contains all the material and relevant details concerning the alleged sexual harassment including the names of the contravener (Respondent) in the format provided as per **Appendix III.**

7. CONCILIATION

ICC, before initiating an enquiry, at the request of Aggrieved Woman, may take steps to settle the matter between her and the respondent through Conciliation and send

report of the conciliatory settlement to the Business / Unit Head and Group President HR

8 COMPLAINT REDRESSAL PROCEDURES:

8.1 The procedure for enquiry into the complaint will as per **Appendix – IV**

8.2 On a written request, made by the aggrieved women, ICC may recommend for the reasons recorded, the transfer of the aggrieved women or the respondent to other work place or grant leave to the aggrieved women, during the pendency of the enquiry.

9. Enquiry Report

ICC shall provide report of its finding to the Unit Head/Business Head/Group President HR within 10 days of completion of the enquiry. The report shall also be forwarded to the concerned parties.

10. Manner of taking action for Sexual Harassment

ICC, based on its findings, can recommend such action as it may consider appropriate and judicious in the circumstances of the matter including a written apology, warning, reprimand or censure, suspension, withholding of promotion, withholding of pay rise or Increments, terminating the respondent from services, or undergoing a counseling session or carrying out Community Service etc. to the Competent Authority. If the Competent Authority is satisfied that the recommendations are based on findings and are judicious, it may accept the recommendations.

11. Punishment for false or malicious complaint.

Where the ICC arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved women or any other person making the complaint has made the complaint knowing it to be false it may recommend to take action against the women for the misconduct as per rules, including termination of service and actions as warranted under the applicable provisions of criminal law.

12. OTHERS

12.1 The Business Heads/Unit Heads will ensure display, on the Notice Board, the Policy/ penal consequences of the Sexual Harassment and the order constituting ICC.

12.2 Unit Heads, through Unit HR, will organize necessary workshops and awareness programmes in coordination with HO for sensitizing employees with the issues.

The Manner to organize workshop will be as per **Appendix – V**

12.3 Unit Heads, through Unit HR will provide necessary facilities to ICC for dealing with Complaints and conducting Enquiries.

12.4 Unit Heads, through Unit HR will ensure securing attendance of respondent and witnesses before ICC

13. Miscellaneous

13.1 ICC shall in each calendar year prepare an Annual report and submit the same to Group President HR at HO /District Officer.

The Contents/format for Annual Report will be as per **Appendix – VI**

13.2 ICC will be governed by various provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal Act, 2013 and Rules made there under). If the provisions or any provision of this policy is found to be incomplete, ambiguous, invalid, illegal or otherwise unenforceable, not inclusive and or not in line with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules, the same shall not affect the other provisions hereof or the whole of this policy, but such provision shall be deemed to be modified to the extent necessary to render such provision enforceable.

13.3 ICC may recommend appropriate amendments to the policy to Group President HR at HO through Business Heads/Unit Heads for incorporating the same in Policy after thorough consideration.

13.4 The Group President HR at HO will keep the Chairman and the Managing Director fully updated on all such matters on monthly basis.

14. OTHER RELEVANT POINTS

14.1. The contents of the complaint, identity and address, inquiry, and any other information pertaining to the inquiry and conciliation proceedings recommendations and / or the action, if any, taken against the Complainant, Respondent and witnesses shall not be published, communicated or made known to the public, press and media and other employees by the Complainant, Committee, witnesses and other people involved in resolving the matter.

14.2. Every employee of HEG Graphite Limited shall be covered under this policy from the date of joining to retirement / termination / resignation including the notice period.

14.3. The management shall provide all necessary assistance for the purpose of effective implementation of the various aspects of this policy, in the best interest of

every HEG Graphite Limited employee.

14.4. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

14.5. In case, ICC finds that the degree of offence needs to be covered under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be facilitated by the Management, through the due Process of Law.

15. CONFIDENTIALITY

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

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APPENDIX I

Guidelines For Sexual Harassment By People Outside, The Rolls Of HEG Graphite Limited.

For those HEG Graphite Limited employees that report sexual harassment by people outside of the rolls of HEG Graphite Limited, but serve as vendors, partners, agencies, consultancies or any other entity, these guidelines shall be followed.

1. The definition of sexual harassment as outlined in the main Policy draft in Clause 4.3 stands.

2. The HEG Graphite Limited employee complaining of sexual harassment shall complain to ICC as outlined in Clause 6.1.

3. ICC shall thereafter constitute a two-member sub group comprising the following to probe the complaint in detail:

a. The Business / Unit Head who manages the third party / vendor / consultancy / agency.

b. The Corporate / Unit HR of the Function that manages the third party / vendor / consultancy / agency.

4. The Redressal/Enquiry Process shall be as detailed in Clause 8, but ICC would be considered enlarged with the addition of sub-group members.

Based on the findings of enlarged ICC, the Management of HEG Graphite Limited would take up the matter with the Management of its vendors, partners, agencies, consultancies or any other entity for necessary action.

5. All the engagements with Vendors, Partners, Agencies, Consultancies or any other such Entity would have a clause to comply with the Policy of HEG Graphite Limited on Prevention, Prohibition and Redressal against sexual harassment of employees

6. All clauses in the policy document shall be valid in the investigation of the third party / agency / consultancy / partner, as the HEG Graphite Limited employee continues to be protected by the policy at all times. Communication of this policy, with all its appendices is compulsory to all third parties, consultancies / agencies and partners of HEG Graphite Limited.

APPENDIX II

Constitution Of Internal Complaints Committee (ICC)

ICC shall consist of following minimum members.

(a) **The Presiding Officer** - A woman employee at a senior level (If not available, can be nominated from other offices/units).

(b) **Members** (minimum two) - Employees committed to the cause of women or have experience in social work or have Legal Knowledge

(c) **Member** (one) - Who is familiar with Labour, Service, Civil or Criminal Law.

One half of the total members so nominated shall be women. ICC members to hold office for not more than three years.

To begin with, the ICC constituted at HO can be adopted by the Operating Units by nominating two members from their Unit; one can be from HR.

Date:

To,

The District
Magistrate
Collectorate Office
Distt. Raisen

Dear Sir,

The HEG Graphite Limited has its formal policy for implementation of Prevention, Prohibition and Redressal against Sexual Harassment of Employees of all its Group Companies.

The reconstitution of Internal Complaints Committee {ICC) at HEG Graphite Limited w.e.f. August 10, 2026 is as under: -

Sl. No.	Name	Designation	ICC Committee Designation
1.	Ms. Jyoti Gupta	Sr. Vice President-Admn.	Chairperson
2.	Ms. U. Padma Latha	General Manager- HR	Member/Secretary
3.	Mr. Ravi Gupta	AVP & Company Secretary	Member
4.	Ms. Rashi Kaushik	Head TA & Business HR	Member
5.	Ms. Vijaya Lakshmi	Executive	Member
6.	Ms. Radhika Ojha	Assistant Manager-Legal	Member
7.	Ms. Divya Roy	Advocate-Supreme Court	Expert Member
8.	Ms. Chitra Kaur Gill	Assistant Manager	Member
9.	Ms. Shilpa Maithil	Executive	Member

Kindly take note of the above re-constitution and updated in your records accordingly.

Thanking you,

For **HEG Graphite Limited**

APPENDIX III

Confidential

Format For Complaint

Name of Complainant:

Employee Id: Department:

Business Unit: Date

of Complaint:

Name of Respondent:

Department (if applicable):

Business Unit (if applicable)::

Description of Complaint:

Any evidence/ material provided at the time of complaint:

Signature/ email id of Complainant:

APPENDIX IV

The Procedure for enquiry into the complaint

1. The Complainant shall submit to ICC, Complaint along with supporting documents and details of witnesses.

2. The complaint committee within 7 days of receipt of Complaint forward the copy of the complaint to the respondent to submit reply.

3. The respondent shall within 10 days file a reply along with supporting documents and details of witnesses.

4. Thereafter, the complaints Committee shall make enquiry into the Complaint in accordance with the Principles of Natural Justice.

5. The parties shall not be allowed to bring any outsider, any Legal Practitioner to represent them at any stage of proceedings before the complaints Committee or at the workplace.

6. The Committee shall have a right to proceed with the Enquiry Ex-parte if the parties / witnesses remain absent.

7. The Enquiry will be completed within a period of 90 days.

8. The Quorum of ICC for Conducting Enquiry Proceedings will be three members including presiding Officer or the Chair Person.

9. In the event that any person is aggrieved by the recommendation made by the ICC Or non-implementation of any such recommendation, he/she may appeal to the appropriate authority, as specified by law, within 90 days of recommendation.

APPENDIX V

Manner to organize workshops

The HO / CEO's shall formulate and widely disseminate this Internal Policy for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.

Carry Out orientation programmes and seminars for the Members of ICC.

Carry out employee's awareness programmes and create forum for dialogues which may involve, women's groups, mothers committee, adolescent groups and any other body as may be considered necessary.

Conduct capacity building and skill building programmes for the Members of ICC;

Declare the names and contact details of all the members of ICC.

Use modules developed by the State Governments, if any, to conduct workshops and awareness programmes for sensitizing the employees with the provisions of the Act.

APPENDIX VI

Preparation of Annual Report

The annual report which the Complaints Committee shall prepare under Section 21, shall have the following details:-

a. Number of complaints of Sexual harassment received in the year;

b. Number of complaints disposed off during the year;

c. Number of cases pending for more than ninety days;

d. Number of workshops or awareness programme against sexual harassment carried out;

e. Nature of action taken by the HEG Graphite Limited.