PROUD TO BE INDIAN
PRIVILEGED TO BE GLOBAL

SUPPLIER CODE OF CONDUCT
HEG GRAPHITE LIMITED

BACKGROUND

As outlined by our values and our Code of Conduct and Ethics, HEG Graphite Limited and its subsidiaries are committed to conduct its business in an ethical, legal and socially responsible and respectable manner. We provide a safe working environment for all our employees and partners and ensure that they are treated with respect and dignity.

We firmly believe that the Suppliers are an integral part of our ecosystem and we are committed to create an environment where our Suppliers are confident that they are treated with respect. We also expect our Suppliers to conform to a similar standard of conduct.

This Supplier Code of Conduct ("Supplier Code") details the expectations that HEG Graphite Limited has from its Suppliers.

DEFINITION

The term "Supplier" means any company, corporation or other entity that sells, or seeks to sell goods or services, to an organization or its subsidiaries including the Supplier's employees, agents, and other representatives. The organization has classified its suppliers into three major categories.

- **Supplier of People:** This refers to contractors (business and support) who provide manpower to organization. The manpower assigned to organization works at organization and/or its client locations as an integral part of the workforce.
- **Supplier of Services:** This refers to partners/agencies which provide essential services (such as catering, food and beverage counters, transportation, construction etc.) at organization locations.
- **Supplier of Products:** This refers to partners who supply products to organization (such as hardware, software, electrical / electronic equipment, furniture, heavy equipment, stationery etc.) across organization locations.

Organization firmly believes in conducting all business transactions with integrity and transparency and ensures that it is ethical, sincere, and open in all its transactions. We anticipate our Suppliers to uphold the values of integrity and ethics in all business dealings, which are in line with the organization policies and applicable laws.

OBJECTIVE

We believe in building strong sustainable businesses that are firmly rooted in the community and demonstrate care for the environment. In keeping with our commitment, we push our supply chain partners to adopt and adhere to the highest ESG standards. This helps us to inculcate strong environmental, social, and governance (ESG) practices in our upstream supply chain. We are also eager to collaborate with and help the partners in the downstream supply chain in their own efforts to be sustainable. The goal is to maintain a balance between the impact on people and the environment along the entire value chain while continuing to pursue corporate expansion.

The supplier code of conduct is made up of Ethics and Compliance, Labor Practices and

Human Rights, Health & Safety and Environment respectively with management system to be put in place by the Suppliers, obligations of Suppliers and reporting concerns in event/case of breach of the Supplier Code.

ETHICS AND COMPLIANCE WITH LAWS

The company has earned a solid reputation in terms of decency, fairness, and honesty. This integrity-based reputation is undoubtedly a crucial component of our success. We demand that our suppliers work with us in an ethical and sincere manner.

- Uphold Business Integrity and Ethics

As a global and renewed company, we are subject to all relevant anti-bribery and corruption laws including but not limited to Prevention of Corruption Act, 1988 (India), the U.S. Foreign Corrupt Practices Act (FCPA) and Bribery Act 2010 (U.K.). The Suppliers should ensure that they comply with the relevant anti-bribery and corruption laws in both letter and in spirit.

Organization has a zero-tolerance policy with respect to any form of bribery and/or corruption. Bribery and corruption are against our C-LIFE values. The organization does not permit such actions, nor do we allow third parties acting on our behalf, such as agents, consultants, suppliers, and contractors to make such payments. The Supplier shall ensure the following.

- Enforce anti-bribery and corruption laws by implementing monitoring and enforcement procedures in place.
- Create invoices and claims with the necessary supporting documentation in accordance with the specified services and supplies.
- Transparently conduct all company transactions and keep correct records of them in their own books and records.
- To obtain or keep business, influence business decisions, or gain any kind of unfair advantage, offering anything of value to anyone on behalf of your organization, including government officials, clients, or their agents, whether directly or indirectly should be restricted.
- Abstain from offering any bribe, kickbacks and/or facilitation payments.

- Conflict of Interest

This covers circumstances in which a company, employee, or director might have a stake in the Supplier's operations in any way, whether through a personal connection, an investment, a position on the board of directors, or any other form of financial connection. Suppliers are expected to notify the organization as soon as they become aware of any conflict of interest that may exist at the time of appointment or in the days before, during, or after the engagement.

- Quality & Product responsibility

Suppliers must ensure that the quality of the product or service offered corresponds with all the terms and conditions of the contract. Suppliers are obligated to abide by all applicable laws and rules pertaining to the limitation or ban of particular chemicals, including the labelling of products, if necessary.

- Fair Business, Advertising and Competition

Suppliers are required to uphold ethical business, marketing, and competitive standards. In violation of the relevant antitrust rules, suppliers must refrain from collusive bidding, price fixing, price discrimination, and other unfair business practices.

- International Trade

Concerning the import, export, re-export, or transfer of organisation products and services, suppliers should abide by all applicable laws and regulations.

- Confidentiality

Suppliers must ensure that confidential or proprietary information about organization, our clients, employees or other parties, which has been gained through employment or affiliation with organization, should not be used for personal or professional advantage. The confidential information clause also extends to any employee data, personal data or third-party information as shared by organization.

- Intellectual Property Rights

The Supplier shall take all necessary precautions to protect the organization's intellectual property rights, including but not limited to its copyrights, patents, trade secrets, and trademarks.

- Data Privacy

The organization, along with its affiliates, assures that it abides by all relevant data protection legislation and contractual obligations. Regarding all Supplier data and Personally Identifiable Information, the organization is committed to uphold the highest standards of data protection and privacy (PII).

The Supplier shall also comply with obligations under applicable data protection laws and contractual requirements, and ensure adequate measures are implemented to address technical and organizational security measures, data access rights, transfer and retention of data, while processing personal data owned, controlled, and managed by organization. Supplier shall inform organization of any instance of data breach within 12 hours of discovery. The Supplier is expected to fully cooperate with organization and provide them with reasonable access to data processing facility for conducting investigations into the reported data breach incident.

- Information Security

The organization has a holistic Supplier Information security risk assurance process which helps in identification of Information security risks through different stages of supplier relations with the end objective of safeguarding critical & sensitive information; and information systems handled by suppliers. The organization expects its suppliers to comply with the applicable laws and regulations and the organization security requirements as communicated from time to time and included under the agreement.

- Responsibilities
  - Agreement on service deliverables.
  - Ensuring compliance with contractual security requirements.
  - Providing support for annual security assessments.
  - Ensuring prompt notification of incidents.
  - Notifying the organization of significant changes or vulnerabilities.

- Supplier is expected to comply with the following.
  - Inform the company within 12 hours of any security event or breach involving the organization or the data of its clients.
  - Mitigate any security risks discovered through the organization's due diligence examination of the Supplier's security procedures.
  - Supplier shall write to the organization for any security related queries.

- Business Continuity

In the event of any physical calamity (such as a fire, flood, wind, earthquake, explosion, etc.) or work stoppage of any type (such as a labour strike, an economic or social structure breakdown, etc.), the Supplier shall ensure that there are plans and processes in place to resume operations. The Supplier shall restart services after a disaster or work stoppage event within promised deadlines, subject to mutual agreement on business continuity plan parameters by both parties.

- Insider Trading

The organization conforms with the relevant US Securities law as well as the SEBI (Prohibition of Insider Trading) Regulations,2015. If the Supplier learns of any Unpublished Price Sensitive Information ("UPSI") pertaining to the organization throughout the course of the contract. When in possession of UPSI, the supplier of the organization is not permitted to communicate such UPSI or engage in trading in the organization's securities that are listed or intended to be listed in contravention of applicable securities laws.

- The organization Brand Name and Logo, Media Rights

Our logo is the most prominent symbol of our products, platforms, and services. The Supplier shall ensure the following.

- Regarding colour, appearance, and size, the organization's brand rules must be rigorously followed in all instances where the logo is used.
- Case studies, brochures, and commercials are only a few examples of the brand manifestations that must adhere to the specified brand rules;
- Suppliers shall not use the organization brand name, logo or any other visual vehicles implying or representing the organization without explicit consent
- Suppliers are responsible for ensuring that their staff only uses HEG Graphite Limited's resources (both tangible and intangible) and electronic communication tools/equipment in a morally and legally correct manner.
- Suppliers shall not make any comments about their engagement with the organization in the media without prior approval. Any media report's precise content, together with any comments and usage information, must be shared with the organisation for clearance.

- Third Party engaged by Supplier

If the Supplier works with a third party to offer goods or services to the organization, the Supplier must make sure that the third party abides by the Supplier Code and doesn't engage in any behaviour that is against the Supplier Code's rules. The Supplier oversees ensuring that compliance with the relevant rules and regulations is being maintained by the third party in question.

- Compliance with Laws

Suppliers shall fully comply with all applicable national and/or local laws and regulations, treaties and industry standards including, but not limited to, those related to labor, immigration, health and safety and the environment. The Supplier must keep all documentation of compliance required by the relevant legislation and submit it to the organization upon request.

LABOR PRACTICES AND HUMAN RIGHTS

The company is dedicated to protecting the workers' human rights and treating them with respect.

- Wages and Benefits

Suppliers shall comply with all applicable wage laws and regulations including but not limited to minimum wages, duration of payment, overtime hours, equal remuneration and other elements of compensation. The Suppliers shall offer its employees all legally required benefits, such as paid time off, social security, insurance, and other similar programmes. Any deductions from wages must be made strictly in accordance with the relevant laws. Suppliers are not permitted to employ

pay deductions as a punitive measure.

- Working hours

Suppliers are required to abide by all current, relevant rules and regulations regarding working hours, overtime, and maximum hours. Suppliers must conduct their business in a way that keeps overtime to minimum while still ensuring productive and decent working conditions.

- Child labor

Suppliers are forbidden from using underage labour in their operations. The company demands that its suppliers adhere to the prohibition and immediate elimination of the worst forms of child labour convention, the ILO minimum age convention, and the Convention on the Rights of the Child. The phrase "child" refers to any person who is normally employed under the age of 18 when permitted by local law, or under the age at which compulsory education must be completed, or under the country's minimum employment age, whichever is highest.

- Forced or compulsory labor/No Human Trafficking

Suppliers are prohibited from using forced, bonded, or compulsory labour, slavery, or human trafficking in their supply chain. Employees must choose to work for Suppliers on a voluntary basis, and they must be free to terminate their employment in accordance with any applicable legislation. No government-issued identification, passports, or work permits will be demanded of employees as a condition of employment. Overcharged rates are unacceptable, and the supplier must reveal all costs incurred by the employees.

- Human Rights

The business expects its suppliers to uphold and respect the protection of universally acknowledged human rights and to avoid participating in violations of such rights.

- Non-Discrimination

Suppliers are prohibited from discriminating in hiring or employment practices on the basis of a person's race, religion, creed, colour, sex, gender, national origin or ancestry, physical or mental disability, a condition that affects their ability to work, age, sexual orientation, or any other legally protected characteristic. Supplier shall strive to create and reinforce a positive workplace culture and always maintain the dignity of its employees.

- Harassment

The company expects that its suppliers give all employees a workplace free from harassment. Any form of harassment that is based on a protected characteristic is prohibited, and Suppliers are restricted from acting in a way that violates the law. The company has a zero-tolerance policy against sexual harassment, and suppliers must take appropriate action to maintain a harassment-free workplace through the publication of policies, regular training sessions, and necessary & prompt support for impacted parties.

Additionally, suppliers are required to regularly arrange awareness campaigns to educate staff members on the applicable laws against harassment. Please refer to the "Reporting Concerns" section for the organization's channels for raising any complaints about harassment

- HEALTH AND SAFETY

The organization expects its Suppliers to provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations.

Suppliers shall provide their employees safe and healthy workplace, which follows all applicable safety and health laws, regulations, and practices. Suppliers shall ensure that all legal requirements are met, including but not limited to those regarding food safety, housing, emergency readiness, industrial hygiene, physically demanding labour, machine safety, and occupational injury and illness. The suppliers must take the necessary actions to reduce the factors that contribute to workplace dangers. The use, possession, distribution, or sale of illegal drugs inside a supplier's supply chain must be prohibited, and suppliers must take appropriate action to address the problem of substance misuse.

ENVIRONMENT

As part of our commitment to create a responsible supply chain, The organization has set up VIVA Framework (Goodwill towards business, society, and environment) that aims at aligning our sustainability practices to our supply chain. We are constantly innovating towards the following aims.

- **Visioning:** Working for alignment of our supply chain to the sustainability policy of the organization
- **Inculcating:** Constantly validate and improve our existing supply chain processes and systems
- **Valuing:** Invest time and effort aimed at value creation. Conduct awareness programs for our suppliers and ensure their engagement through appropriate mechanisms
- **Assessing:** Periodic checks to ensure compliance with the Supplier Code and sustainability practices. Ensuring corrective/preventive measures to sustain practices and achieve continual improvement

Suppliers will operate in a manner that is sustainable and strives to protect the environment. The organization is certified to ISO14001 standards. We expect our Suppliers to adhere to the organization standards as a minimum and work towards following objectives.

Any intentional act that causes harm to others, and may involve verbal harassment, verbal or non-verbal threats, physical assault, stalking, or other methods of coercion such as manipulation, blackmail, or extortion.

- **Energy and Emissions:** The organization expects its suppliers to participate, at a minimum and co-create solutions to minimize and regulate the wastage of energy.
- **Waste:** The organization has been persistent in its waste management efforts and ensures reuse, recycling and the responsible disposal of waste, The Suppliers shall participate in this process and take steps to reuse and recycle their products.
- **Water:** The organization aims to make their campuses water sustainable by reducing consumption, rainwater harvesting and recycling wastewater. The organization expects its suppliers to participate, at a minimum and co-create solutions to achieve this.

MANAGEMENT SYSTEM

Suppliers must set up a management system and maintain documentation necessary to demonstrate compliance with the Supplier Code. The system shall be designed to monitor and ensure

- (a) compliance with applicable laws and regulations;
- (b) conformance with the Supplier Code; and
- (c) identification and mitigation of operational risks related to the Supplier Code.

OBLIGATIONS OF SUPPLIERS

Suppliers are accountable for ensuring that the Supplier Code is understood by and followed by all of their employees, subsidiaries, business partners, and subcontractors that are involved in supplying services to the organisation. In addition to any other requirements contained in any agreement a Supplier may have with the organisation, compliance with the Supplier Code is necessary.

Suppliers are required to self-regulate and provide proof of their adherence to the Supplier Code. On request, suppliers must submit reports with the business and actively audit and control their daily operations. The business is still allowed to audit its suppliers to ensure compliance. The Supplier shall provide the organisation with all necessary assistance and cooperation in order to conduct the audit. In spite of the fact that the organisation will engage with suppliers to increase compliance, failure to abide by the supplier code may result in a appropriate action, including but not limited to the termination of the relationship with the supplier.

REPORTING CONCERNS

You can report any suspected violations of this Supplier Code by calling one of the organization's helplines listed in the link.

Within 12 hours of becoming aware of any data breach or cyber security incident involving the organization or the firm's customer data, the incident must be reported in writing.

You should rapidly report any suspected infractions, including any instances of retaliation. Retaliation might take the form of unfavorable behavior, harassment or discrimination on the job in response to your reporting of a possible violation. To the greatest extent possible, the company will uphold confidentiality, and it will not put up with reprisals or other forms of discrimination against anybody who has, in good faith, asked for guidance or reported suspicious activity or potential Supplier Code violations. The business has made a commitment to fairly evaluate every concern brought up and offer a solution.

NON -COMPLIANCE

Non-compliance of the relevant provisions of the Act, read together with the Rules and the Regulations will attract the penal provisions as per the respective laws.

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