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WASTE MANAGEMENT POLICY
HEG GRAPHITE LIMITED

BACKGROUND

We at HEG Graphite Limited have established this Policy to demonstrate our commitment for the implementation of the widely accepted "waste hierarchy" as a part of our mission to achieve our sustainability vision:

- Preventing waste accumulation;
- Reusing waste;
- Recycling waste;
- Disposing of waste responsibly.

In furtherance of this commitment, the Board of Directors has adopted this 'Waste Management Policy'.

Almost all facets of modern civilization contribute to the creation of garbage. Large volume of solid waste is produced in both private residences and massive manufacturing sites. These wastes are frequently classified as "domestic", "commercial", "regulated", "hazardous", "biomedical", "construction" etc. Previously, such wastes were either burned or dumped into landfills for disposal; however, it is now understood that both of these disposal methods are unsustainable because of the limited capacity of landfills, the resulting emissions of carbon dioxide and methane which contributes to the climate change, and the detrimental effects of emitted particulates on health. The Company should be responsible to use effective waste management techniques to make sure that waste is disposed appropriately.

OBJECTIVE

In implementation of our mentioned commitment to prevent, abate and mitigate the emissions into the air, we have adopted several initiatives towards which we will strive. These are supported by a range of actions and improvements through which those are to be achieved.

In pursuance of our stated commitments to prevent, reuse, recycle and, wherever necessary, responsibly dispose of solid waste, we have adopted a number of objectives towards which we will strive.

This Policy pertains to all the Hazardous (Solid - UPS Batteries; Liquid - Compressed oil / Used oil, used filters, RO Plant & STP chemicals), E-waste (Defunct computers, monitors, servers, laptops and other electronic items) and Non-hazardous waste (Dry - Scrap waste, paper & cardboard, garbage & other office waste and Plastic waste, Wet - Food waste from canteens, other organic waste such as grass, leaves etc).

- Ensure Waste management in accordance with all legislative requirements; plan for future legislative changes and also to mitigate their effects.
- Minimize the waste generation at source and facilitate reduction, reuse and recycling of waste generated through authorized recyclers and vendors in a cost-effective manner.
- Identifying and coordinating operations within the waste management process requires the provision of well-defined guidelines.
- To encourage waste minimization, reuses, and recycling, ensure awareness of the environment.

- Ensure that all the HEG Graphite Limited - owned facilities and sites handle and store trash of all types in a safe manner.
- Promote best practices and holistic approaches in waste management.
- Ensure that hazardous garbage, including used batteries and electronic waste, is transferred to recyclers approved by the State/Central Pollution Control Boards at the appropriate locations.

These objectives are supported by a range of actions and improvements through which those aims are to be achieved.

PRINCIPLES OF CIRCULAR ECONOMY

Businesses are asked to embrace the idea of "Circularity" with the objective to reduce waste and implement closed-loop systems for constant resource reuse, sharing, repair, refurbishment, remanufacture, and recycling. Together with the advantage for the environment of less waste, pollution, and carbon emissions, circularity lowers costs and boosts efficiency in businesses.

At HEG Graphite Limited, we employ the principles of Circular Economy through waste reduction hierarchy: 3 R's i.e., Reduce, Reuse & Recycle.

- Reducing usage of natural resources and materials,
- Reusing waste wherever practicable,
- Recycling materials whenever possible and thus move towards a circular economy.

This is applied at every stage of our operations to minimize all types of waste, including general office waste, including paper waste and cardboards, cotton, plastic, Organic waste such as Grass/leaves from Garden, Food waste from Canteen, and Hazardous waste such as oils, Oil filters, fuel waste from DG sets chemicals and batteries, electronic waste.

HEG Graphite Limited manages these wastes in accordance with all current applicable procedures including government regulations/ legislatures.

MINIMIZING THE WASTE

- Undertake a rigorous assessment of the solid waste produced across all our sites to identify the sources;
- Identify the current method of dealing with each type of waste;
- Develop program for each type of waste to Prevent or minimize the creation of solid waste in the first place through improved efficiency and use of new technologies, changes in processes;
- Identify new methodologies to reuse or recycle wastes created by our site's operations;
- Monitoring our solid waste production and disposal on a regular basis to assess our progress and communicating this information to our stakeholders.
- Evaluate and utilize the existing opportunities to reuse and recycle solid wastes;
- Dispose of wastes that we were unable to avoid, reuse, or recycle in the most ethical and effective way possible;
- Work with our suppliers and customers to explore all avenues to reduce solid wastes both

through our production processes and through the products we supply;
- Trained our employees about the causes and impacts of waste so they can, with our help, minimize their own impacts both at work and at home;
- Support research and development of new and innovative technologies within our industries that will contribute to reductions in solid waste.
- Ensuring the safe and secure handling, organization, and transportation of our raw materials, packaging materials and finished products;
- Making use of natural or renewable materials, where practical, for design, production, packaging and transportation so long as they do not compromise the performance or safety of our products.
- Encourage those suppliers and business partners whose attitudes and performance most closely matches our own aims and aspirations.

We also strive to educate our suppliers and business partners, customers and stakeholders regarding the responsible handling and use of our products. Across our diverse and extended supply chain, we prefer suppliers and business partners that have similar policies and practices and include relevant expectations in our contracts with them. For those suppliers who do not have similar policies and practices, we encourage and support them to do so. Active engagement and collaboration based on transparency, corrective action, and continuous improvement are hallmarks of our approach.

The Sustainability Framework, which we are committed to adopting and maintaining across all our sites, will be used to manage the attainment of our goals, the implementation of improvements to achieve them, and the fulfillment of our compliance duties.

- HEG Graphite Limited report has a description of how they dispose their 'Hazardous Waste', 'Waste Electrical and Electronic Equipment (WEEE)', 'Batteries' and 'Non-Hazardous Waste'
- Hazardous waste can be defined as a waste that contains substances or has properties that might make it harmful to human health or the environment.

NON-COMPLIANCE

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

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