PROUD TO BE INDIAN
PRIVILEGED TO BE GLOBAL

WASTE WATER MANAGEMENT POLICY
HEG GRAPHITE LIMITED

BACKGROUND

The effects of industrial waste water can be numerous and varied, depending on the pollutants present in the water, the quantities involved, and the nature and mode of disposal of the waste water. Harmful pollutants in waste water discharged from industrial premises have been directly linked to incidents of both acute and chronic ill health among local populations for decades, and there is now widespread recognition that poorly managed waste water discharges have resulted in serious ground contamination, harming crops, livestock, and livelihoods in many countries around the world.

The Board of Directors has approved this "Waste Water Management Policy" in order to uphold its commitment.

OBJECTIVE

As part of our efforts to deliver our Sustainability Vision, we at HEG Graphite Limited ('HEG Graphite' or 'the Company') have established this Policy to demonstrate our commitment to effectively manage waste water released from our operations.

DEFINITIONS

- 'Company' shall mean HEG Graphite Limited.
- 'Board' shall mean Board of Directors of the Company
- 'Members' shall mean shareholders of the Company who hold shares of the Company.
- 'Policy' shall mean Waste Water Management Policy.

POLICY

As India's leading graphite electrode manufacturer, we have always been committed towards positively impacting the environment. Some of this waste may contains different substances that, if released directly into local watercourses without treatment, may pollute them, resulting in health issues and unfavorable environmental impacts. While we have always attempted to manage all of our waste water discharges and disposal activities within any applicable regulatory framework relating to waste water management and disposal, we recognize that we have a moral and social duty to do much more. In pursuance of our stated commitments to prevent, effectively treat and safely dispose of waste water, HEG Graphite will endeavor to:

- Monitor both the quantities of waste water we produce and discharge/dispose of, as well as the quantities of pollutants within that waste water, on a regular basis to see how we are progressing, and report on this progress to our stakeholders.
- Exploit existing opportunities to prevent and reduce the generation of waste water on our sites;

- Exploit existing opportunities to reuse and recycle waste water within our processes and use of treated wastewater for irrigation, for industrial use, for the production of biogas and even to use as drinking water.

- Undertake the assessment of:

  - All waste water sources on all of our sites to determine the origin of waste water;
  - The potential pollutants that each waste water stream may contain;
  - All treatment mechanisms employed at our sites, including an assessment of their effectiveness at removing pollutants;
  - All the places where our sites discharge or dispose of waste water into the wider environment
  - Eliminate or reduce any potential effects of waste water discharge from our sites into the environment by utilizing innovative technology, making improvements to the infrastructure, etc.;
  - Educate all employees about the causes and impacts of waste water so they can, with our help, minimize their own impacts both at work and, if possible, at home;
  - Define and openly share in a Code of Practice the minimum expectations we have of our suppliers and business partners in relation to waste water prevention, treatment and disposal;
  - Establish a detailed and transparent process for evaluating each supplier's and business partner's attitudes, risk profile, and performance on a variety of sustainability issues, including waste water.;

OBLIGATIONS

We are also committed to our statutory and voluntary obligations relating to water resource management which includes: All local and national statutory regulations relating to water sourcing and use.

- The Water (Prevention and Control of Pollution) Act, 1974
- The Water (Prevention and Control of Pollution) Cess Act, 1977

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