



## GRAPHITE INDIA LIMITED

REGD. & H.O.: 31, CHOWRINGHEE ROAD, KOLKATA - 700 016, W.B., INDIA PHONE: 91 33 4002 9600, 2226 5755 /4942 / 4943 / 5547 / 2334, 2217 1145/ 1146 FAX: 91 33 2249 6420, E-mail: gilro@graphiteindia.com WEBSITE www.graphiteindia.com, CIN: L10101WB1974PLCO94602

# Human Rights Policy

The policy statement of Human Rights:

"Graphite India Limited (GIL) is committed to maintaining a corporate culture that respects the principles aimed at promoting, protecting and supporting all nationally and internationally recognized human rights. The Company believes that contributing to the realization of Human Rights with its various facets, not only supports the sustainable operations of its business but is also critical to the ability of the company to influence Company's Stakeholders to adhere to such impactful values in their own operations."

### **Human Rights and Sphere of Influence**

The Company's ability to influence and enforce human rights standards is strongest within its own operations, including its employees and contract workforce, as well as within subsidiaries where the Company holds a controlling interest.

This Policy applies to all employees, workers, contract labour, apprentices, trainees, and management personnel across GIL's manufacturing units, offices, project sites, and other operational locations. It also extends to third-party entities including suppliers, vendors, contractors, service providers, logistics partners, distributors, consultants, and other business associates engaged with GIL.

Further, the Policy covers activities across GIL's value chain, including raw material sourcing, procurement, manufacturing operations, transportation, warehousing, distribution, and interactions with local communities and other stakeholders affected by the Company's operations. GIL expects its business partners and suppliers to align with the principles of this Policy and to uphold comparable human rights standards within their own operations.

The Policy recognizes that GIL will endeavour to promote the recognition of basic human rights as defined in the United Nations Global Compact.

### **Commitment framework**

#### **1. Dignity of all stakeholders -**

- a) Community -The Company should consult regularly with local communities in a sensitive and open manner.
- b) Employees - Employees need to adhere to GIL Code of Conduct and shall be treated with dignity and in accordance with the policy of maintaining a work environment free of all forms of harassment, whether physical, verbal or psychological.
- c) Contractors/ suppliers - Contractors and suppliers are expected to maintain a work environment free of all forms of harassment, whether physical, verbal or psychological. GIL shall ensure that violations within GIL premises are addressed appropriately.



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### 2. Well-being - Company sees following steps as essential:

- a) Physical and mental health of stakeholders involved in workplaces of the Company (employees, contractors, etc):
  - Making available clean, potable water in the workplace
  - Supplying protective equipment and training necessary to perform tasks safely
  - Ensure that company operations do not adversely impact long term health of individuals'
  - Not subject pregnant or breastfeeding women to conditions that would be harmful for them
  - When operating in areas where contagious diseases are endemic, providing appropriate information and training to mitigate risk
- b) Maternity related: The Company will
  - Provide women with maternity leave for the period as prescribed under the Maternity Benefit Act, without risk of losing their employment or responsibilities
  - Grant women temporary leave in case of illness or complication related to pregnancy or birth, without risk of losing their employment
- c) Injury & illness: This covers an individual with a temporary or permanent disability, physical or otherwise from injury sustained in workplace. GIL will:
  - Provide emergency care as necessary
  - Give reasonable time to recover from the injury or illness
  - When the individual returns, Company will ensure that injured/ ill individuals are given appropriate duties and assistance while they recover from the injury or illness.

### 3. Culture of respect & support for Human Rights - GIL acknowledges human rights of its Stakeholders as it forms the central part of the Company's community relations:

- a) Understanding the perspectives of local/indigenous people through consultation and respecting their rights:
  - The Company should create awareness among the employees of the perspectives of local people's attitudes, beliefs and values which need to be respected.
- b) Conditions of work & wages:
  - Being trained to work and then working in safe, healthy, and environmentally responsible conditions comes first and foremost.
  - The Company shall ensure fair conditions of employment in compliance with applicable labour laws, including provision of reasonable working hours, adequate rest periods, weekly off, and safe workplace practices.



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- Wages shall be paid in accordance with the Minimum Wages Act and other applicable laws of the land and shall be disbursed in a timely manner without unauthorized deductions.
  - Overtime work shall be voluntary, within statutory limits and compensated at rates prescribed by law.
- c) Privacy: Company will
- Ensure that, upon request, individuals will be made aware of personal information that the business maintains on them, where it is held and how it can be updated
  - Not ask workers about their health or pregnancy status except when the status is directly relevant to the performance of job duties, and seeking to keep such information confidential
  - Ensure adequate protection of personal information held by the company
  - Only provide an individual's personal or other information to government authorities to the extent required by law and upon request, or with the individual's permission

#### 4. Avoiding connivance in Human Right abuses:

The Company will ensure its non-involvement in human right abuses relates to:

a) Child Labour

GIL strictly prohibits and does not condone the employment of child labour in any of its operations and shall comply with applicable laws relating to minimum age for employment, ensuring that no child labour is engaged directly or indirectly at its facilities. The Company shall ask for an undertaking of non-involvement in employing child labour from suppliers and contractors. If in doubt or as required, the Company will monitor their employment practices through surveys, site visits and audits. The Company aims to prevent any incidence of child labour through ongoing vigilance and to progressively increase the number of internal audits carried out year on year to assess child labour and other human rights issues within its operations as well as across its value chain.

b) Forced Labour

The Company will not make use of slave, forced or involuntary labor in any form

- The Company will not make use of slave, forced, bonded, trafficked, or involuntary labour in any form in its operations and shall comply with all applicable labour laws and regulations.
- The company will ensure that employees are free to resign from their employment subject to reasonable notice as per applicable laws and employment terms.
- To ensure that all feasible measures are taken to prevent workers from falling into debt bondage through company loans.
- GIL need to access contractors, suppliers and others with whom there is substantial involvement, so as to make them aware of the standards, which is expected from them.



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- GIL may obtain undertakings from suppliers and contractors confirming non-involvement in forced labour and, if in doubt or as required, may monitor their employment practices through surveys, site visits, and audits. The Company aims to progressively increase the number of internal audits carried out year on year to assess forced labour and other human rights issues within its operations as well as across its value chain.
- GIL may opt for a strategy of constructive engagement with the offending suppliers/contractor, rather than simply terminating contracts with them, wherever appropriate.

### c) Sexual Harassment

- GIL maintains zero tolerance towards any form of sexual harassment at the workplace, regardless of gender and is committed to providing a safe, dignified and inclusive work environment for all employees and workers.
- The Company shall comply with the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and has constituted an Internal Committee (IC) to resolve complaints in a fair, confidential and time-bound manner.
- GIL undertakes preventive measures including regular awareness programs to promote respectful workplace behaviour and understanding of acceptable conduct.
- Multiple reporting channels are made available to enable safe and confidential reporting of concerns, including access to the Internal Committee without fear of retaliation.
- The Company shall monitor suppliers and contractors' employment practices through surveys, site visits, and audits.

### 5. Adherence to principles of ILO

- a) The Company will ensure consistency with the principles of ILO, as well as laws of the countries in which it operates.
- b) The rights and freedoms may in no case, be exercised contrary to the purposes and principles of the ILO.

### 6. Adherence to principles of UNGC

- a) The Company will ensure consistency with the principles of UNGC, as well as laws of the countries in which it operates
- b) The rights and freedoms may in no case, be exercised contrary to the purposes and principles of the UNGC



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### 7. Freedom of association and Right to collective bargaining

- a) It is the choice of each employee as to whether or not they wish to join a trade union, and the company shall respect those choices
- b) Employees doing the same work to the same standards of flexibility and productivity will receive comparative remuneration and employment conditions, whether employed under individual or collective agreements
- c) Company does not interfere with the rights of workers to express themselves freely, nor their right to access information, which enable them to perform their work properly
- d) The Company aims to build constructive relationships with employees and trade representatives and is committed to maintaining high number of employees covered by collective bargaining agreements to the extent possible.

### 8. Protection from discrimination - Company employs on the basis of job requirements and does not discriminate on grounds of age, ethnic or social origin, gender, sexual orientation, politics or religion.

- a) Age: The Company will not discriminate, directly or indirectly, based on the age of the person. Also Company will ensure not to treat anyone less favorably because of their actual or perceived age unless the job requirement precludes certain age groups.
- b) Gender: Company will not discriminate on the basis of gender on any aspect of employment (hiring, pay, job assignments, promotions, layoff, training, fringe benefits, and any other term or condition of employment)
- c) Marital Status
  - The Company will not discriminate because of marital status (i.e. single, married, in de facto relationship, separated, divorced or widowed)
  - The Company will treat fairly and not ask discriminatory questions that point to marital status or family issue
- d) Differently abled
  - All differently abled will be treated with dignity and respect.
  - The Company will provide necessary facilities that should be available to disabled people that include blind, partially blind and handicapped
  - The Company will not do such things, which expose differently abled to undue hardships (for eg: asking them to lift heavy objects etc.)
- e) Race
  - The Company will not tolerate any racial harassment like racial slurs, offensive or derogatory remarks about a person's race or color, or the display of racially-offensive symbols
  - While defining and implementing policies, the sensitivity to traditions/ cultural aspects needs to be ensured.
- f) National/ Regional origin and ancestry



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- The Company will allow workers to speak their Own language in the workplace when this does not interfere with their ability to fulfil their job responsibilities or adversely impact workplace health, safety or security
- g) Indigenous/regional status
- The Company will respect language, culture and values of indigenous people
- The Company may engage in positive discrimination towards indigenous people for vocational training, employment and education
  - The Company will strive to achieve the free and informed consent of indigenous people to proceed with developments
  - The Company will strive to respect the land rights of local community in business operation areas.
  - Special arrangements may need to be made to accommodate and protect the prevalent traditional systems and beliefs
- h) Personal beliefs
- The Company shall respect the practice of faith by its stakeholders
  - The Company shall not prevent employees from wearing clothing or other symbols that are an expression of their faith, provided that such clothing or symbols do not increase the risk of accidents in the workplace and do not interfere with their ability to perform their job responsibilities
- i) Religion & Spiritual practice - In respecting this right, the Company will ensure:
- To reasonably accommodate an employee's religious beliefs or practices, unless doing so would cause more than a minimal burden on the operations of the business.
  - No offensive remarks about a person's religious beliefs or practices
- j) Political affiliation:
- The Company shall not support any specific political party or candidate for political office. While Company respects individual's political affiliation or beliefs, name and any such activity should be done outside the Company premises and Company's name and resources should not be used.
- k) Sexual orientation:
- Company will not collect data on sexual orientation
  - No discrimination will be made based on the sexual orientation of the person

### 9. Human Rights Due Diligence

The company is committed to identifying, preventing, mitigating, and addressing adverse human rights impacts arising from its operations, products, and business relationships. The Company will undertake periodic human rights due diligence to assess actual and potential risks to employees, contract workers, communities, and other stakeholders across its value chain. This process includes risk identification, integration of findings into business decisions, monitoring of mitigation



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measures, and appropriate corrective actions where necessary. GIL also expects its suppliers and business partners to cooperate in these efforts and to uphold comparable human rights standards. Where adverse impacts are identified, the Company will work towards timely remediation through appropriate grievance redressal mechanisms.

### 10. Alignment of conduct of employees

- a) Formal Human Rights training will be imparted to the employees in a phased manner. Using this training, employees need to understand the context of the policy and its application.
- b) Formally defined measures will be undertaken to align conduct of all employees on Human Rights related aspects
- c) The Human Resource department shall be responsible to drive this policy across the organization and ensure that any complaints/ feedback are acted on suitably.

### 11. Grievance Redressal Mechanism (GRM)

All employees shall have access to GRM which is fair and transparent and the resolution is time-bound.

Related Policies :

- Code of Conduct of Graphite India Limited
- Equal Opportunity Policy
- Diversity and Inclusion Policy
- GRM for Employees & Workers
- GRM for Customers
- GRM for Suppliers

**DATE: 10.11.2025**

**A. DIXIT**

**EXECUTIVE DIRECTOR**