



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

Stakeholder Engagement Policy

1. PURPOSE

Graphite India Limited (hereafter “GIL” or “the Company”) recognizes that its long-term success and sustainability depend on strong, transparent, and collaborative relationships with its stakeholders. This Stakeholder Engagement Policy establishes a structured framework for identifying, mapping, engaging, and communicating with stakeholders who are impacted by or have an influence over GIL’s operations.

Given GIL’s extensive operational footprint, including manufacturing plants, engineering processes, procurement of critical raw materials, logistics operations, domestic and international sales, supplier partnerships, and regulatory interfaces, this Policy aims to minimize risks related to misalignment, information gaps, stakeholder dissatisfaction, and operational disruptions, while strengthening trust and cooperation.

The Policy guides GIL’s systematic approach to stakeholder engagement to ensure constructive dialogue, continuous interaction, and mutually beneficial outcomes.

2. SCOPE AND APPLICABILITY

The scope of this SEP extends to all GIL operations and facilities. It serves as a guiding framework for engagement with all stakeholders connected to the Company’s value chain, including employees, workers, customers, suppliers, contractors, service providers, logistics partners, regulators, local communities, investors, lenders, and other relevant stakeholders, on matters relating to operational performance, environmental and social impacts, human rights and labour practices, occupational health and safety, regulatory compliance, business practices, community concerns, and other issues arising from or affecting the Company’s activities.

3. PROCESS OF STAKEHOLDER ENGAGEMENT

GIL follows a three-step approach for effective stakeholder engagement:

Step 1: Identification of Stakeholders

The first step involves identifying stakeholders who influence or are affected by the Company’s activities. Factors considered include:

- Their level of influence on GIL’s operations
- The degree to which they are impacted by GIL’s activities
- Dependency on GIL for livelihood, business, or services
- Their role in regulatory, compliance, or strategic decision-making
- Their potential to support or resist organizational initiatives



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

Based on the nature of association with the Company, stakeholders are categorized as Internal and External Stakeholders as depicted below:

Stakeholder Groups	Stakeholders
	Internal Stakeholders
Board	➤ Board of Directors
Employees	➤ On-roll employees ➤ Management staff, engineers, supervisors ➤ Trainees, apprentices and interns
Workers	➤ Contract workers engaged in operations and maintenance ➤ Security personnel ➤ Housekeeping and canteen staff ➤ Other workers engaged at plant sites and offices
	External Stakeholders
Service Providers	➤ Suppliers of raw materials (e.g., petroleum needle coke, coal tar pitch, additives etc.,) ➤ Suppliers of refractories, consumables, spare parts, machinery, equipment etc., ➤ Packaging material and office supply vendors ➤ Maintenance and engineering service providers ➤ Contractors and project service providers ➤ Logistics partners and transporters ➤ Third-party laboratories and inspection agencies ➤ Consulting and professional advisory firms etc.,
Community	➤ Local communities around GIL facilities and project sites ➤ Landowners of GIL facilities
Institutional Stakeholders	➤ Investors and shareholders ➤ Banks and financial institutions ➤ Insurance companies ➤ Industry associations and trade bodies etc.,
Government Bodies/ Regulatory Authorities	➤ Central and State Pollution Control Boards ➤ Directorate of Industrial Safety & Health / Factory Inspectorate ➤ Labour Department ➤ District Administration and local authorities ➤ Fire Safety Department ➤ Electricity Boards and utility authorities ➤ Customs and Export-Import authorities ➤ Other statutory and regulatory bodies
Non-Government Organizations (NGOs) and Civil Society	➤ Non-Governmental Organizations (NGOs) ➤ Community-based organizations ➤ Civil society groups
Customers / End Users	➤ Industrial customers (e.g., steel manufacturers, foundries) ➤ Domestic and international buyers ➤ Trading partners and distributors
Other Relevant Groups	➤ Media (print, electronic, digital) ➤ Local business communities ➤ Educational and research institutions ➤ Channel partners and industry platforms



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

➤ General public

GIL recognizes that the stakeholder landscape may evolve as the business grows, markets expand, or new partnerships emerge.

Step 2: Stakeholder Mapping and Engagement

GIL assesses and prioritizes stakeholders based on their level of interest, influence, risks, expectations, and potential impact. Engagement strategies are tailored to each stakeholder group to ensure meaningful and effective interaction.

Below is a engagement mechanism table for GIL stakeholders:

Stakeholder Group	Engagement Mechanisms	Responsibility	Frequency of Engagement
Board of Director	<ul style="list-style-type: none"> Board Meetings Committee Meetings Annual General Meetings (AGMs) Familiarization programs for Board members. 	Company Secretary	Need Based
Employees & Workers	<ul style="list-style-type: none"> Employee Engagement surveys. Training. Personal interactions (including performance appraisal discussions). Internal magazines /newsletters. Departmental and Townhall meetings. 	HR Department	Need Based
Service Providers	<ul style="list-style-type: none"> Personal interaction One-on-one negotiations and meetings Project-based discussions Technical visits and audits Email communication and updates Research report 	Procurement/ Operations Department	Need Based
Community	<ul style="list-style-type: none"> Personal interaction Community consultations CSR activities and awareness programs. 	HR & Admin Department	Need Based
Institutional Stakeholders	<ul style="list-style-type: none"> Annual Reports Annual General Meetings Investor meets and earnings calls Review meetings Research reports and financial disclosures Email broadcasts and intimations 	Finance & Legal Department	Need Based
Government Bodies/ Regulatory Authorities	<ul style="list-style-type: none"> Engagements with national, state, and local officials Compliance submissions and statutory filings Inspections and site visits Regulatory meetings and consultations Participation in industry and regulatory 	Legal/ Admin/ Compliance Department	Need Based



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

	forums		
Non-Government Organizations (NGOs) and Civil Society	<ul style="list-style-type: none">• Project-based discussions• Collaborative initiatives for CSR• Progress reports and beneficiary feedback• Meetings and field assessments.	CSR Department	Need Based
Customers / End Users	<ul style="list-style-type: none">• Email communication and updates• Personal interaction• Distributor and retailer meet• Feedback surveys• Marketing communication• Promotional activities and brand events	Sales & Marketing Department	Need Based
Other Relevant Groups	<ul style="list-style-type: none">• Media briefings• Press releases• Workshops & seminars• Marketing and brand communication• One-on-one interactions	Sales & Marketing Department	Need Based

Step 3: Communication and Continuous Monitoring

GIL implements engagement strategies through various channels, including:

- Meetings, consultations, workshops, and awareness programs
- Formal communication channels such as circulars, notices, emails, reports, and portals
- Digital platforms for feedback collection and grievance management
- Collaboration with partners to address operational challenges
- CSR initiatives and community development programs

Stakeholder feedback is monitored on an ongoing basis to:

- Identify emerging concerns and expectations
- Evaluate satisfaction levels and engagement effectiveness
- Modify engagement strategies where necessary
- Prevent conflicts and promote collaborative problem-solving

Public communication channels, including the Company's corporate website, provide stakeholders with avenues to share concerns or queries. Grievances received through established mechanisms will be addressed within defined timelines.

4. ROLES AND RESPONSIBILITIES

Relevant functional teams are responsible for implementing this Stakeholder Engagement Policy, developing engagement plans, and coordinating stakeholder interactions with oversight from senior management. These teams will collaborate across departments to ensure effective communication, accurate feedback collection, and timely resolution of stakeholder concerns, thereby fostering a transparent and inclusive engagement process.



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

5. REPORTING AND TRANSPARENCY

GIL is committed to transparency in its stakeholder engagement practices. The Company may disclose information on engagement initiatives, key concerns raised by stakeholders, and actions taken to address them through annual reports, sustainability disclosures, or other appropriate communication channels. Where applicable, summaries of grievances received and resolved may also be reported.

6. COMPLIANCE AND ACCOUNTABILITY

All employees, contractors, and business partners are expected to comply with this Policy. Non-compliance may result in corrective or disciplinary action in accordance with applicable procedures. Relevant functions, including Human Resources and Corporate Affairs (as applicable), are responsible for ensuring that engagement practices adhere to the principles outlined in this Policy.

7. COMMUNICATION

This Policy shall be communicated to:

- Employees through onboarding programs, training sessions, internal communications, and policy manuals
- External stakeholders through the Company's website and relevant engagement channels

GIL encourages stakeholders to provide feedback and supports open, transparent, and constructive dialogue.

8. GOVERNANCE

This Policy is approved by the Executive Director of GIL. HR Team and relevant functions are responsible for implementation, monitoring, and periodic review of the Policy to ensure its continued relevance, effectiveness, and alignment with regulatory requirements, organizational priorities, and international best practices. Updates will be made as necessary to strengthen stakeholder engagement processes.

DATE: 20.11.2025

A. DIXIT

EXECUTIVE DIRECTOR