



## **Site Closure Policy**

## Gravita Site Closure Policy

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### 1. Purpose

This policy establishes a framework for the responsible closure of Gravita India's operational sites, ensuring environmental sustainability, social responsibility, regulatory compliance, and long-term positive legacy. It aims to minimize risks and liabilities associated with site closure and promote beneficial post-closure land use.

### 2. Scope

This policy applies to:

- All Gravita India & Global manufacturing operations.
- All stages of the operational lifecycle: operation, closure, and post-closure.
- All employees, contractors, and stakeholders involved in site operations.

### 3. Closure Planning Principles

Gravita shall:

- Initiate closure planning after management approval for site closure.
- Develop site-specific closure plans that are prepared by site closure experts/parties.
- Engage stakeholders, including regulators and local communities, throughout the closure process. This also includes availing services of special agencies / consultants, experts in this area.
- Aim will be to implement best in class site closure practices keeping in view local regulatory requirements & guidelines if available.

### 4. Financial Assurance

Gravita shall:

- Maintain a separate financial provision for closure costs.
- Financial provision will be done through OPEX route.
- Proper approval will be taken from management from site closure expenditure.

### 5. Implementation of Closure Activities

Closure activities shall:

- Be executed in accordance with the final approved closure plan.
- Ensure compliance with legal, regulatory, and sustainability standards.
- Prioritize health, safety, and welfare of employees and contractors.
- Be monitored and reported transparently.

### 7. Post-Closure Management

Gravita shall:

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- Return sites to a condition as per legal and regulatory requirements of the host country or as per internationally accepted best practices.
- Promote sustainable land use and community benefit.
- Conduct post-closure monitoring for a minimum of 1 year.
- Address safety risks within premises.
- Support staff transition and retraining.

### 8. Roles and Responsibilities

- **Site Managers:** Oversee closure planning and execution, stakeholder engagement.
- **ESG Team:** Ensure policy compliance.
- **Finance Department:** Manage financial provisions and audits.
- **HR Department:** Support employee transition and training.

### 9. Compliance and Performance Monitoring

Gravita shall:

- Periodically assess compliance with this policy.
- Report on site closure, if any, annually through Annual Report.
- Review and revise the policy every 2 years or as required.

Approved by

**Mr. Yogesh Malhotra**

(CEO & WTD, Gravita India Limited)