

JINDAL POLY INVESTMENT AND FINANCE COMPANY LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS/INFORMATION

1. Purpose and Scope:

The policy for 'Policy for Determination of Materiality of Events/Information to be Disclosed' has been framed in accordance with the provisions of Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Regulation").

The policy shall be used to determine the materiality of events/information to be disclosed to general public and/or to the Stock Exchanges.

All the words and expressions used in this policy, unless defined in this policy, shall have meaning assigned to them under the Regulation or in absence of which, as per the Companies Act, 2013 and any rules and regulations made thereunder, as amended from time to time.

The Policy shall be effective from the date the Regulation becomes effective i.e. from the date of approval of the Board:

2. Disclosure of material event/information:

(i) Events specified in **Para A of Part A of Schedule III** of the Regulation are deemed to be material events and the Company shall make disclosure of such events.

(ii) The Company shall make disclosure of events specified in **Para B of Part A of Schedule III** of the Regulation, based on application of the guidelines for materiality, as specified in sub-regulation (4) of Regulation 30 of the Regulation.

(iii) Regarding any other events/information, the Company shall make disclosures of such events or information which, in the opinion of the Board of directors, is material. The Board shall authorize one or more Key Managerial Personnel' ("Authorised Personnel") to determine materiality of an event or information for the purpose of disclosure to the general public/stock exchange, based upon the general criteria envisaged in sub-regulation 4 of Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and this Policy

(iv) The Company shall disclose to stock exchange(s) of all events, as specified in Part A of Schedule III, or information as soon as reasonably possible and not later than twenty four hours from the occurrence of event or information; in case the disclosure is made after twenty four hours of occurrence of the event or information, the Company shall, along with such disclosures provide explanation for such delay to the Stock Exchange.

(v) Disclosure with respect to events specified in sub-para 4 of Para A of Part A of Schedule III shall be made within thirty minutes of the conclusion of the board meeting.

(vi) The Company shall disclose all such events or information which has been disclosed to stock exchange(s) under this regulation on its website, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company.

(vii) The Company shall disclose all events or information with respect to its subsidiaries which are material for the Company.

3. Determining of materiality of event/information:

A particular event/information would be considered as material in nature if it satisfies either of the criteria proposed below:

(A) Quantitative criteria calculated based on audited consolidated financial statements of the last audited financial year, would mean event/ information where the value involved or the impact exceeds:

- five per cent of the gross turnover or revenue or total income, or
- 20 per cent of the net worth, whichever is lower.

(B) Qualitative criteria would mean an event/ information:

- the omission of which is likely to result in a discontinuity of information already available publicly, or
- the omission of which is likely to result in significant market reaction if the said omission came to light at a later date, or
- which in the opinion of the Authorised Personnel is considered to be material i.e. is significant to the operations or performance of the Company.

If particular information or event in question satisfies any of the 'qualitative' or 'quantitative' criteria, the Company shall disclose the same to the stock exchange.

4. Procedures to be followed

The Committee consisting all the Departmental heads as mentioned hereunder

1. Mr. Ghanshyam Dass Singal- Managing Director
2. Ms. Shakshi Gupta – Chief Financial Officer
3. Mr. Pramod Kumar- Company Secretary Cum Compliance Officer

who are responsible for relevant areas of the Company's operations shall report to Company Secretary about , any event/information which may be considered as material or which the Departmental heads are sure as to its materiality. The event / information should be reported immediately after a Departmental head becomes aware of it.

On receipt of communication of potential material event / information, the Company Secretary , will review the event/information, verify its accuracy and materiality and depending upon the requirement, disclose the same to the Stock Exchanges and to the general public; and to ensure to place it on the website of the Company.

5. Policy review and hosting on the website:

This policy is subject to review by the Board of Directors as and when necessary, as per statutory requirements or otherwise. This policy shall be hosted on the website of the Company.