Virgo Polymers (India) Ltd.
A1A MMDA Indl Complex, MM Nagar,
Chengalpet. Dist. - 603209. India.
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POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS AND INFORMATION OF VIRGO POLYMERS INDIA LIMITED

1. PREAMBLE

This Policy for Determination of Materiality of Events and Information ("Policy") has been framed in accordance with Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations"), including amendments thereto

The purpose of this Policy is to establish a framework for identification, determination and disclosure of material events or information to the Stock Exchanges in a timely and adequate manner so as to ensure transparency and uniformity in dissemination of information to stakeholders.

2. OBJECTIVE

a) Ensure timely disclosure of material events and information to the Stock Exchanges;
b) Assist the authorised officials of the Company in determining materiality of events and information;
c) Ensure compliance with applicable provisions of the SEBI LODR Regulations and other applicable laws;
d) Maintain consistency, transparency and fairness in disclosure practices;
e) Avoid selective disclosure of material information.

3. DEFINITIONS

"**Act**" means the Companies Act, 2013 and rules made thereunder.

"**Board**" means the Board of Directors of Virgo Polymers India Limited.

"**Company**" means Virgo Polymers India Limited.

"**Listing Regulations**" means the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, including any statutory modification or re-enactment thereof.

"**Material Event**" or "Material Information" means any event or information specified under Regulation 30 read with Schedule III of the Listing Regulations and determined in accordance with this Policy.

"**Stock Exchanges**" means the recognised stock exchanges where the securities of the Company are listed.

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4. APPLICABILITY

This Policy shall apply to all departments, functional units, subsidiaries (if any), directors, key managerial personnel and employees of the Company.

5. AUTHORISED PERSONS

The Board hereby authorises the following officials ("Authorised Persons") jointly or severally for the purpose of determining materiality of an event or information and for making disclosures to the Stock Exchange.

- Managing Director / Whole-Time Director;
- Chief Financial Officer;
- Company Secretary & Compliance Officer.

The Authorised Persons shall:
a. Assess the materiality of events or information;
b. Ensure timely disclosures to Stock Exchanges;
c. Seek clarification or supporting documents from concerned departments;
d. Monitor compliance with disclosure requirements under applicable laws.

6. CRITERIA FOR DETERMINATION OF MATERIALITY

The Company shall consider the following criteria for determination of materiality of events or information:

The omission of an event or information which is likely to result in discontinuity or alteration of information already available publicly;

a) The omission of an event or information which is likely to result in significant market reaction if the said omission came to light at a later date;
b) The omission of an event or information whose value or expected impact exceeds the lower of the following:
    - Two percent (2%) of turnover, as per the last audited consolidated financial statements of the Company;
    - Two percent (2%) of net worth, as per the last audited consolidated financial statements of the Company;
    - Five percent (5%) of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company.
c) Any other event or information which, in the opinion of the Board or Authorised Persons, is considered material.

7. DISCLOSURE OF MATERIAL EVENTS

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A. Events specified under Para A of Part A of Schedule III of the Listing Regulations shall be disclosed without application of materiality guidelines.
B. Events specified under Para B of Part A of Schedule III shall be disclosed upon application of materiality criteria specified under this Policy.
C. The Company may also disclose any other event or information which may be necessary to enable investors to appraise the Company's position and avoid creation of a false market in the securities of the Company.

8. TIMELINES FOR DISCLOSURE

The Company shall disclose material events or information to the Stock Exchanges as soon as reasonably possible and within the timelines prescribed under the SEBI LODR Regulations.

a) Within 30 minutes from closure of the Board Meeting in case of decisions taken by the Board;
b) Within 12 hours from occurrence of the event or information originating from within the Company;
c) Within 24 hours from occurrence of the event or information not originating from within the Company.
d) Where disclosure is made after the prescribed timeline, the Company shall provide an explanation for the delay.

9. MARKET RUMOURS

The Company shall provide confirmation, clarification or denial of market rumours in accordance with the SEBI LODR Regulations and applicable SEBI circulars, as may be required from time to time.

10. WEBSITE DISCLOSURE AND ARCHIVAL

All material disclosures made to the Stock Exchanges shall also be hosted on the website of the Company and shall remain available for a minimum period of five years and thereafter as per the archival policy of the Company.

11. AMENDMENT

Any amendment, clarification, circular or notification issued by SEBI or any other statutory authority shall automatically become applicable to the Policy.

The Board reserves the right to amend or modify this Policy from time to time in accordance with applicable laws.

For **VIRGO POLYMERS (INDIA) LIMITED**

Managing Director