

POLICY FOR DETERMINATION OF MATERIALITY OF ANY EVENT / INFORMATION

A. Preface

The Board of Directors (the "Board") of Vipul Organics Limited (the "Company") has adopted the following policy and procedures with regard to determination of Materiality of events or information which are required to be disclosed to the Stock Exchange(s) in terms of Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time ("Listing Regulations") (The Policy). This Policy has been formulated in accordance with Clause (ii) of sub-regulation (4) of Regulation 30 of the Listing Regulations.

Words and expressions used in this Policy, shall have the same meaning as ascribed to them in Listing Regulations, SEBI Act, Companies Act, 2013, rules & regulations made thereunder and/ or any other law applicable to the Company for time being in force.

B. Purpose of the Policy

The purpose of this Policy is to determine materiality of events and information based on criteria specified under clause (i) of sub-regulation (4) of Regulation 30 of the Listing Regulations and to ensure that the Company shall make disclosure of events / information specified in Para A and B of Part A of Schedule III of the Listing Regulations to the Stock Exchange(s).

C. Criteria for determination of materiality of events / information

The Company shall consider the criteria as specified in clause (i) of sub-regulation 4 of Regulation 30 of the Listing Regulations for determination of materiality of events / information, as may be amended from time to time.

D. Disclosure of events or information

- I. The Company shall make disclosure of events or information which, in the opinion of the Board of Directors of the Company, is material;
- II. The Company shall make disclosure of events or information as specified in Para A of Part A of Schedule III to the Listing Regulations without any application of the guidelines for materiality;



Vipul Organics Limited

Corporate Office : B-603A, Kaledonia Bldg., Sahar Road, Off W. E. Highway, Andheri (East), Mumbai - 400 069, India.

Regd. Office : 102, Andheri Industrial Estate, Off Veera Desai Road, Andheri (West), Mumbai - 400 053, India.

CIN: L24110MH1972PLC015857

+91 22 6613 9999

info@vipulorganics.com

www.vipulorganics.com

- III. The Company shall make disclosure of events or information as specified in Para B of Part A of Schedule III to the Listing Regulations based on application of the guidelines for materiality, as specified in clause (i) of sub-regulation 4 of Regulation 30 of the Listing Regulations;
- IV. Any new reference/variant introduced in the existing range of Company's products shall not be treated as 'new product' in terms of clause no. 3 of Para B of Part A of Schedule III to the Listing Regulations;
- V. Any award or contract (including any modification or termination thereof), bagged or received by the Company from any of its customers, whether situated in India or abroad, for the existing range of Company's product (including any new reference/variant of the existing products) shall be deemed to be 'in normal course of business of the Company' in terms of clause no. 4 of Para B of Part A of Schedule III to the Listing Regulations; and
- VI. The Company shall make disclosure of events or information as specified in Para C & Para D of Part A of Schedule III to the Listing Regulations.

E. Procedural guidelines for determination of materiality of events/ information

In order to ensure that the Company complies with the disclosure obligations under Regulation 30 of the Listing Regulations, the Board has established an internal system for reporting any event / information which may require disclosure so that the event / information can be properly assessed, and decision can be made regarding its disclosure to the Stock Exchanges.

Under the system, Chief Finance Officer, Vice President, Head of the Departments and other senior management personnel who are responsible for relevant areas of the Company's operations (Responsible Officers) must report to Managing Director or Company Secretary & Compliance Officer of the Company of any event / information which may possibly be material or of which the Responsible Officer is unsure as to its materiality. The event / information should be reported immediately after a Responsible Officer becomes aware of it.

On receipt of communication of potential material event / information, the Company Secretary & Compliance Officer will:

- i. Review event / information and to take whatever steps necessary to verify its accuracy;
- ii. Assess whether the event / information is required to be disclosed to the Stock Exchanges under the Listing Regulations;



Vipul Organics Limited

Corporate Office : B-603A, Kaledonia Bldg., Sahar Road, Off W. E. Highway, Andheri (East), Mumbai - 400 069, India.

Regd. Office : 102, Andheri Industrial Estate, Off Veera Desai Road, Andheri (West), Mumbai - 400 053, India.

CIN: L24110MH1972PLC015857

+91 22 6613 9999

info@vipulorganics.com

www.vipulorganics.com

- iii. Report the matter to Managing Director that event / information is material and requires disclosure under Regulation 30 of the Listing Regulations. Where Managing Director or Company Secretary & Compliance Officer is not certain about materiality of event / information, they may refer matter for external legal advice.
- iv. The procedure to be followed in relation to the lodgement of announcement of material event / information is as follows:
 - i. Prepare draft announcement to the Stock Exchange(s): If the event / information is material, the Company Secretary & Compliance Officer will prepare draft announcement to the Stock Exchange(s) which is factual and expressed in clear manner and obtain approval of Managing Director of the Company.
 - ii. Disclosure to stock exchanges: The Company Secretary & Compliance Officer on behalf of the Company will make disclosure of such event / information to the Stock Exchange(s).
 - iii. Post disclosure on website: After making disclosure to the Stock Exchange(s), the Company Secretary & Compliance Officer will arrange to host such event / information on the website of the Company. All the announcements made under this Policy shall be kept on the website as per the "Archival Policy" of the Company.

F. Communication of this Policy

For all new employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be handed over upon adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the web-site of the Company.

G. General

The Managing Director and / or Company Secretary & Compliance Officer are severally authorised to amend any provision of this Policy to give effect to any change / amendment notified by the SEBI or any other regulatory authority, from time to time. Such change(s) / amendments in the policy shall be subject to approval of the Board of Directors of the Company. In case any provision / clause of this Policy is rendered unlawful or unenforceable due to any regulatory changes, the Policy shall be read by excluding that particular clause / provision.



Vipul Organics Limited

Corporate Office : B-603A, Kaledonia Bldg., Sahar Road, Off W. E. Highway, Andheri (East), Mumbai - 400 069, India.

Regd. Office : 102, Andheri Industrial Estate, Off Veera Desai Road, Andheri (West), Mumbai - 400 053, India.

CIN: L24110MH1972PLC015857

+91 22 6613 9999

info@vipulorganics.com

www.vipulorganics.com

In case any provision of this Policy is contrary to or inconsistent with the provisions of the Listing Regulations and/ or any other applicable law for time being in force, the latter shall prevail.

H. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

This policy is approved and adopted by the Board of Directors in its meeting held on 3rd July, 2023 and will be effective from 14th July, 2023.



Handwritten signature

Vipul Organics Limited

Corporate Office : B-603A, Kaledonia Bldg., Sahar Road, Off W. E. Highway, Andheri (East), Mumbai - 400 069, India.

Regd. Office : 102, Andheri Industrial Estate, Off Veera Desai Road, Andheri (West), Mumbai - 400 053, India.

CIN: L24110MH1972PLC015857

+91 22 6613 9999

info@vipulorganics.com

www.vipulorganics.com