



IGL SPIRITS LIMITED
(CIN: U11011UT2024PLC018229)

DETERMINATION OF MATERIALITY OF AN EVENT OR INFORMATION POLICY (“the Policy”)

1. Preamble

IGL Spirits Limited (the “Company”) respects the rights of security holders and the public to have equal access to all Company information required to be disclosed under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”) including any amendment thereof as laid by the Securities and Exchange Board of India (“SEBI”).

Pursuant to the requirements of Regulation 30 of SEBI Listing Regulations, **the Board of Directors of the Company has framed this Policy on Determination of Materiality of an Event or Information Policy (“the Policy”)**.

2. Objective

The Policy aims to provide a framework for determining the materiality of events and information for the purpose of disseminating information in a fair and timely manner to Stock Exchanges on an ongoing basis in terms of Regulation 30 of SEBI Listing Regulations.

Further, the Policy is designed for systematic identification, categorization, review, timely disclosure to the Stock Exchanges and regular updation of the events/ information which may have material bearing on the performance /operation of the Company and as a result, may affect the market prices of the shares of the Company.

The Policy shall be applicable to all events/ information in the Company, as and when they fall under the criteria enumerated in the Policy.

3. Definitions

In this Policy, unless the context otherwise requires:

- a. **“Act”** means the Companies Act, 2013 including the rules, schedules, clarifications, and guidelines issued by the Ministry of Corporate Affairs and any amendment thereto and/or modification thereof from time to time;
- b. **“Board”** refers to the Board of Directors of IGL Spirits Limited;
- c. **“Company”** refers to IGL Spirits Limited;
- d. **“SEBI Listing Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any



amendment thereto and/or modification thereof from time to time;

- e. **“Stock Exchange”** means a recognised stock exchange as defined under clause (f) of Section 2 of the Securities Contracts (Regulation) Act, 1956; and;
- f. **“Subsidiary(s)”** shall mean subsidiaries of the Company as defined under the Act.

All other words and expressions used but not defined in this Policy, shall have the same meaning as defined in the SEBI Listing Regulations, and if not defined therein, then as per the Companies Act, 2013 or the Securities Contracts (Regulation) Act, 1956 and/or the rules and regulations made thereunder, or any other Act and/or applicable laws or any statutory modification or re-enactment thereto, as the case may be.

4. Categories of Events/Information

- A. The information covered by this Policy shall include “information related to the Company's business, operations, or performance which has a significant effect on securities investment decisions” (hereinafter referred to as “material information”) that the Company is required to disclose in a timely and appropriate manner by applying the guidelines for assessing materiality.
- B. Events or information specified in **Para A of Part A of Schedule III** of Regulation 30 of the SEBI Listing Regulations will be **disclosed without any application of materiality criteria**.
- C. Events or information specified in **Para B of Part A of Schedule III** of Regulation 30 of the SEBI Listing Regulations **will be disclosed based on application of materiality criteria**.
- D. Any other information/event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities.
- E. Without prejudice to the generality of above, the Company may make disclosures of event/information as specified by the SEBI from time to time.



5. Materiality Criteria

Materiality will be determined on a case to case basis depending on the facts and the circumstances pertaining to the event or information.

The following criteria will be applicable for determining materiality of event or information:

a. The omission of an event or information which is likely to:

- i. result in a discontinuity or alteration of an event or information already available publicly; or
- ii. 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 the expected impact in terms of value, exceeds the thresholds prescribed under the SEBI Listing Regulations** and/or other Applicable Laws, as may be amended from time to time.

c. in case, where the criteria specified in sub-clauses (a) and (b) are not applicable, an event/information may be treated as being material if in the opinion of the Board of Directors of the Company, the event / information is considered material and ought to be disclosed.

6. Timelines for Disclosure of Material Events / Information

The Company shall disclose to the Stock Exchanges of all events or informations that are required to be disclosed under this Policy and/or as specified in Regulation 30 of SEBI Listing Regulations **as soon as reasonably possible and in any case not later than the timelines specified under Regulation 30(6) of SEBI Listing Regulations**. In the event the disclosure is made after the timelines specified above, the Company shall, along with such disclosures provide an explanation for such delay.

In case an event or information is required to be disclosed by the Company in terms of the provisions of Regulation 30 of SEBI Listing Regulations pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

The Company shall make disclosures updating the material developments pertaining to material events on a regular basis, till such time the event is resolved/closed, and to be disclosed to the Stock Exchanges with relevant explanations, if required.



The Company shall also disclose all events or information with respect to subsidiaries which are material, for the Company.

All the disclosures made to the Stock Exchanges under this Policy shall also be placed on the Company's website and the same shall be available for a minimum period of five years and there after archived in accordance with the Company's Archival Policy.

7. Authority for determining materiality of an event or information and making disclosure(s)

The Chairman and Managing Director (**"Authorized Officials"**) of the Company are severally authorized for determining the "materiality of an event or information" and for making disclosures to the Stock Exchanges. Further, the Chairman and Managing Director, Chief Financial Officer and the Company Secretary of the Company are severally authorized for making disclosures to the Stock Exchanges.

The Contact details of the above officials are as follows:

S.N o.	Name of KMPs	Designation	Contact Details
1	Shri U. S. Bhartia	Chairman and Managing Director	0120-3090100 usb@indiaglycols.com
2	Shri Manoj Kumar Rai	Executive Director & COO	0120-3090189 manoj.raai@iglspirits.com
3	Shri Naresh Kumar Agrawal	Chief Financial Officer	0120-3090225 naresh.agrawal@indiaglycols.com
4	Shri Ishan Khanna	Company Secretary	0120-3090100 compliance.officer@iglspirits.com

8. Obligations of Internal Stakeholders and KMPs for Disclosure

Any potential material event or information, including the information specified in **Para A, Para B and Para C of Part A of Schedule III** of the SEBI Listing Regulations shall be forthwith **informed to the Authorized Officials, Chief Financial Officer and the Company Secretary**, upon occurrence, with adequate supporting data/information, to facilitate accessing and ascertaining the materiality of the event or information and to make appropriate disclosure to the Stock Exchanges as per the guidelines mentioned in this Policy.

9. Review of this Policy

The Board shall have the power to review or amend this Policy to ensure it remains consistent with the Company's objectives and responsibilities and the



provisions laid down under the SEBI Listing Regulations and other regulatory authorities from time to time.

In any circumstance where the provisions of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the relevant law, rule, regulation or standard will prevail over this Policy until such time as this Policy is changed to conform to the said law, rule, regulation or standard.

Clarification, if any on this Policy shall be provided by the Chairman and Managing Director of the Company.

This Policy was adopted on 8th September, 2026.