VINYL CHEMICALS (INDIA) LIMITED

POLICY ON DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION FOR DISCLOSURE

BACKGROUND:

Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as SEBI Listing Regulations), requires the Company to frame a Policy for determination of materiality of events or information for disclosure of items listed in Para B of Part A of Schedule III of the SEBI Listing Regulations.

OBJECTIVE:

The objective of the Policy is to determine materiality of events or information and to disseminate the information in a timely manner to enable the investors to make well informed decisions.

POLICY:

The Company shall consider the following criteria for determination of materiality of any event or information for disclosure of items listed in Para B of Part A of Schedule III of the SEBI Listing Regulations:

- (a) any information or event (other than movements in price of VAM, which are cyclical in nature and can be regarded as normal for trading activity) which is likely to affect the operations of the Company by 10% or more of the turnover of the Company; or
- (b) the omission of an event or information, is likely to result in discontinuity or alteration of event or information already available publicly; or
- (c) the omission of an event or information is likely to result in significant market reaction, if the said omission came to light at a later date; or
- (d) any information or event not covered in (a) to (c) above which in the opinion of the Board of Directors of the Company, is considered material.

AMENDMENTS:

The Board of Directors and/ or Chairman and Managing Director of the Company may amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.