

Policy on Determination of Materiality - Prima Plastics Limited

VERSION CONTROL	
Policy on Determination of Materiality	
Version Number	V4
Date Approved	
Effective Date	21 May 2026
Supersede Version	V3 dated 11 August 2023

1. Introduction

The Board of Directors of Prima Plastics Limited ("Company"), has adopted the following policy (the "Policy") pursuant to the requirements of Regulation 30(4) (ii) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

2. Maintenance, Review and Approval of Policy

The undersigned shall be responsible to own, maintain and update this Policy by engaging with relevant functional units. The Policy shall be reviewed by the Vice President (Accounts & Finance) and the policy shall be subsequently put up for final approval before the Board of Directors.

Sd/-	Sd/-
Ms. Nehal Goyal (Company Secretary)	Mr. Manoj Toshniwal (VP - Accounts & Finance)

The Board of Directors shall review and amend the Policy from time to time to ensure relevance and compliance with the applicable statutory provisions.

3. Objective

The objective of the Policy is as follows:

- a) To ensure that the Company complies with the disclosure obligations to which it is subject to as a publicly-traded company as laid down by the Listing Regulation, various Securities Laws and any other legislations;
- b) To ensure that the information disclosed by the Company is adequate, timely and transparent and continuous till the termination of specific event or information;
- c) To ensure that all investors have equal access to important information that may affect their investment decisions;
- d) To protect the confidentiality of Material / Price sensitive information within the context of the Company's disclosure obligations;
- e) To provide a framework that supports and fosters confidence in the quality and integrity of information released by the Company and avoiding establishment of false market in the securities of the Company;
- f) To ensure uniformity in the Company's approach to disclosures, raise awareness and reduce the risk of selective disclosures;
- g) To determine the principles of materiality based on which the Company shall make disclosures of events or information;
- h) To endeavour that corporate documents and public statements are fair and do not contain any misrepresentation.

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 ("Material Information") that the Company is required to disclose in a timely and appropriate manner by applying the guidelines for assessing materiality. The Board vide this Policy has attempted to prescribe guidance for deciding the magnitude of the materiality of events and information.

4. Definitions

- a) **“Act”** shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.
- b) **“Board of Directors”** means the Board of Directors of Prima Plastics Limited, as constituted from time to time.
- c) **“Company”** means Prima Plastics Limited.
- d) **“Key Managerial Personnel”** mean key managerial personnel as defined in sub section (51) of Section 2 of the Act;
- e) **“Material Event”** or **“Material Information”** shall mean such event or information as may be determined based on the guidelines provided in the Regulations or as may be determined in terms of Clause 6. of this Policy.
- f) **“Policy”** means this Policy providing guidelines for determining materiality of event or information and as may be amended from time to time.
- g) **“SEBI Listing Regulations”** mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, amendments, or re-enactment thereof, to be read with relevant clarifications, circulars and notifications issued in this regard. Any other term not defined herein shall have the same meaning as defined in the Act, the Regulations or any other applicable law or regulation to the extent applicable to the Company.
- h) **“Subsidiary”** shall mean a company shall be considered as Subsidiary if it falls within the criteria defined under Section 2(87) of the Act

5. Applicability

This Policy is applicable to the following events or information:

- a) Events specified under Regulation 30 read with Para A of Part A of Schedule III of the SEBI Regulations and as may be amended from time to time, shall be disseminated to the Stock Exchange(s) irrespective of value and without the application of guidelines for materiality;
- b) Events specified under Regulation 30 read with Para B of Part A of Schedule III of the SEBI Regulations and as may be amended from time to time, shall be disclosed based on application of the guidelines for materiality, as specified therein;
- c) Any other event or information which is considered as being material in the opinion of the Board of Directors of the Company

6. Guidelines for Determination of Materiality of Event or Information

In order to determine the materiality of a particular event/information in the nature of Regulation 30(4) of the SEBI Listing Regulations, the following criteria shall be considered:

- a) Quantitative:
 - the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:

- 2% of turnover, as per the last audited consolidated financial statements of the listed entity;
- 2% of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;
- 5% of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the listed entity;

b) Qualitative:

- omission of events or information which is likely to:
 - result in a discontinuity or alteration of event or information already available publicly; or
 - result in significant market reaction if the said omission comes to light at a later date

The 'qualitative' test may always be applied to determine materiality, even in circumstances where the 'quantitative' tests thresholds are not met or the 'quantitative' test is otherwise not applicable.

Based on the above, as per Industry Standards Note published in consultation with SEBI, an analysis as to which of the three parameters should be applied for events or information stated in Schedule III, Part A, Para B is suggested for uniform approach by the listed entities.

Apart from the above mentioned criteria, any other event/information which is considered as being material in the opinion of the Board of Directors of the Company and/ or any major development which is likely to have an impact on the business of the Company, shall be promptly disclosed to the stock exchange(s). Without prejudice to the generality of the above, the Company may make disclosures of events/information as specified by the Board of Directors of the Company, from time to time.

7. Authority to the Key Managerial Personnel:

The Managing Director, Chief Financial Officer and the Company Secretary & Compliance Officer ("hereinafter referred to as the Key Managerial Personnel") shall jointly and severally have the authority to determine the materiality of any event or information and ensure disclosure of the same is made to the stock exchange(s).

Any transaction, event or information relating to the Company that might fall within the Scope of this Policy or requires to be intimated in terms of the requirements of the SEBI Listing Regulations, as specified in this policy, is required to be reported immediately by the employees of the Company to the Company Secretary & Compliance Officer of the Company.

Upon receipt of such intimation the Key Managerial Personnel shall jointly or severally determine the applicability of the regulation and necessity of making submission to the stock exchange.

The abovementioned Key Managerial Personnel may be contacted on the below mentioned address:

Prima Plastics Limited,
National House, Opp. Ansa "A" Building,
Saki Vihar Road, Powai, Mumbai - 400 072 MH
Phone: +91 7304284101

Email ID - investor@primaplastics.com

8. Timelines for Intimation to the Stock Exchange

The Company shall disclose to the stock exchange(s) all events or information which are material in terms of the provisions of this regulation as soon as reasonably possible and in any case not later than the following:

- a) thirty minutes from the closure of the meeting of the board of directors in which the decision pertaining to the event or information has been taken;

Further, in case the meeting of the board of directors closes after normal trading hours of that day but more than three hours before the beginning of the normal trading hours of the next trading day, the listed entity shall disclose the decision pertaining to the event or information, within three hours from the closure of the board meeting.

Further, in case the meeting of the board of directors is being held for more than one day, the financial results shall be disclosed within thirty minutes or three hours, as applicable, from closure of such meeting for the day on which it has been considered.

Normal trading hours shall mean time period for which the recognized stock exchanges are open for trading for all investors.

The Company shall disclose in accordance with the timelines in line with SEBI Regulations as amended from time to time.

- b) twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the listed entity;
- c) twenty-four hours from the occurrence of the event or information, in case the event or information is not emanating from within the listed entity.

9. Scope and Limitation

In the event of any conflict between the provisions of this Policy and the SEBI Listing Regulations, or any other Regulations, Acts, Rules, or any statutory enactments, the provisions of such Acts, Rules or the SEBI Listing Regulations, or any other Regulations or any Statutory enactments, shall prevail over this Policy and the part(s) so repugnant shall be deemed to be severed from the policy and the rest of the Policy shall remain in force.

Further, any change in this Policy necessitated due to subsequent changes in the applicable provisions of any law/regulation shall be incorporated to give effect to such changes without any further act by the Board of Directors of the Company and the Company Secretary & Compliance Officer shall have the authority to amend the contents of the policy, whenever necessary, to bring them in line with any change(s) / amendment (s) in the provisions of the regulatory framework.

10. Disclosures

This Policy shall be hosted on the website of the Company, www.primaplastics.com and the address of such web link shall be provided in the Annual Report of the Company and / or any other place as may be required in terms of the requirements of applicable law/regulation.