

GODFREY PHILLIPS INDIA LIMITED

POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

Background:

Regulation 30 of the Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), requires every Listed Company to frame a policy for determination of materiality for disclosure of events or information to Stock Exchanges, based on the criteria specified in the said Regulations and the same is also required to be disclosed on the Company's website.

1. Criteria for materiality:

Without prejudice to the material events specified under Listing Regulations, the Policy on determination of materiality for disclosures of events or information is being made as under:

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

- (a) the omission of an event or information is likely to result in discontinuity or alteration of event or information already available publicly; or
- (b) 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;
- (c) 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. "

2. Authority to determine materiality and disclosure of Information

The following Key Managerial Personnel, have been severally authorised to determine the materiality of an event or information and for the purpose of making disclosures to Stock Exchange(s):

- (a) Mr. K.K. Modi, Managing Director
49, Community Centre, Friends Colony,
New Delhi-110025
kk-gpi@modi.com
+91 11-26832155

(b) Mr. Sharad Aggarwal, Whole-time Director
49, Community Centre, Friends Colony,
New Delhi-110025
Shaggarwal-gpi@modi.com
+91 11-26832155

(c) Mr. Sunil Agrawal, Chief Financial Officer
49, Community Centre, Friends Colony,
New Delhi-110025
sagarwal-gpi@modi.com
+91 11-26832155

(d) Mr. Sanjay Gupta, Company Secretary
49, Community Centre, Friends Colony,
New Delhi-110025
skgupta-gpi@modi.com
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3. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company