

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

VARUN BEVERAGES LIMITED

Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [“SEBI (LODR)”], requires every listed company to make disclosure of any events or information which, in the opinion of the Board of Directors of the Company, is material. For this purpose, sub-regulation 4 of Regulation 30 requires the Board of Directors of the listed company to frame a policy for determination of materiality of events or information, based on specified criteria, which shall be hosted on the website of the Company.

1. GOVERNING LAWS

This policy shall be governed by the provisions of the SEBI Act, Rules and Regulations made thereunder and all other applicable laws for the time being in force.

2. PURPOSE

This Policy lays down the criteria for determination of materiality of event or information of **Varun Beverages Limited** (hereinafter referred to as “the Company”), apart from those events which are already specified in Para A of Part A of Schedule III of SEBI (LODR) which are deemed to be material events, so that such event or information can be promptly disclosed to the stock exchange(s).

3. SCOPE

This Policy applies to those events or information pertaining to **Varun Beverages Limited** (hereinafter referred to as “the Company”), apart from those events which are already specified in Para A of Part A of Schedule III of SEBI (LODR), which are determined to be material as per norms laid down in this Policy and are required to be disclosed to the stock exchange (s).

4. EFFECTIVE DATE

The Policy is effective from 28th March, 2016.

5. CRITERIA FOR DETERMINING THE MATERIALITY OF EVENTS OR INFORMATION

In order to determine whether a particular event/information is material in nature as per Regulation 30 (4) of SEBI (LODR), the Board of Directors shall consider the following criteria:

Where the omission of an event or information is likely to result in:

- a) discontinuity or alteration of event or information already available publicly;
- or
- b) significant market reaction if the said omission came to light at a later date.

Apart from the above mentioned criteria, any other event/information which is considered as material in the opinion of the Board of Directors of the Company shall be disclosed to the Stock Exchange (s).

6. AUTHORITY TO KEY MANAGERIAL PERSONNEL

The Chief Financial Officer and / or the Company Secretary of the Company shall be severally authorized to determine materiality of an event or information and to ensure disclosure of the same to the Stock Exchange (s). Their contact details are as under:-

Chief Financial Officer

Mr. Kamlesh Kumar Jain
Varun Beverages Limited
RJ Corp House, Plot no. 31, Institutional Area,
Sector – 44, Gurgaon – 122 002 (Haryana)
E-mail id.: kamlesh.jain@rjcorp.in
Ph. No. 0124- 4643100 – 500

Company Secretary

Mr. Mahavir Prasad Garg
Varun Beverages Limited
RJ Corp House, Plot no. 31, Institutional Area,
Sector – 44, Gurgaon – 122 002 (Haryana)
E-mail id.: complianceofficer@rjcorp.in
Ph. No. 0124- 4643100 – 500

7. DISCLOSURE PROCESS

Timely and appropriate disclosures shall be made in respect of the event / information which are material under Regulation 30 of SEBI (LODR) or under this policy. Regular updates, if required, shall be made with relevant explanation. The Company shall adhere to the statutory timeframes for disclosure of the event / information to the Stock Exchange. Delay, if any, shall be explained along with the disclosure. The Company shall disclose all events / information, with respect to its subsidiaries, which are material for the Company. All disclosures shall be made available on the website of the Company as per the Archival Policy of the Company.

8. REVIEW / AMENDMENT

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.