HALDIA PETROCHEMICALS LIMITED

POLICY FOR DETERMINING MATERIAL SUBSIDIARY

(Pursuant to Regulation 16(1)(c) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

1. APPLICABILITY

Regulation 16(1)(c) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI LODR) mandates all listed companies to formulate a policy for determining material subsidiary(ies).

2. SCOPE

This Policy sets out the criteria for determining material subsidiary(ies).

3. POLICY

A subsidiary whose income or net-worth exceeds ten percent of the consolidated income or net-worth, respectively, of the Company and its subsidiaries, in the immediately preceding accounting year, shall be considered as 'Material Subsidiary'.

This Policy shall come into effect from the date of approval by the Board of Directors ("Board").

The Policy shall be implemented as per the provisions of the SEBI Listing Regulations

4. REVIEW AND AMENDMENT

(i) This Policy is framed based on the provisions of the SEBI Listing Regulations. In case of any subsequent changes in the provisions of the SEBI Listing Regulations, which makes any of the provisions in the Policy

inconsistent with the SEBI Listing Regulations, then the provisions of the SEBI Listing Regulations would prevail over the Policy.

(ii) The Company Secretary is authorized to amend this Policy to give effect to any such changes/amendments as may be notified by SEBI and the amended Policy shall be placed before the Board for noting and ratification.

(iii) The Management shall review this Policy periodically and recommend any proposed changes to the Board for approval.

Place: Kolkata

Date: 11.11.2022

By order of the Board of Directors

Sd/-

Company Secretary