



RAJ POLYPACK LIMITED
POLICY ON IDENTIFICATION OF GROUP COMPANIES
(Policy approved by the Board of Directors on June 01, 2026)

1. PREAMBLE

This Policy on Identification of Group Companies ("Policy") has been formulated and adopted by the Board of Directors of Raj Polypack Limited ("Company") for the purpose of identifying and determining the group companies of the Company in accordance with applicable provisions of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 ("SEBI ICDR Regulations"), as amended from time to time, and other applicable laws.

The Policy provides a framework for identifying entities that may be considered as group companies for the purpose of disclosures in offer documents and other regulatory filings.

2. OBJECTIVE

The objectives of this Policy are:

- a) To establish transparent criteria for identification of group companies;
- b) To ensure adequate disclosures in offer documents and regulatory filings;
- c) To provide consistency in determining entities that may be considered group companies; and
- d) To comply with applicable legal and regulatory requirements.

3. APPLICABILITY

This Policy shall apply for identifying group companies of the Company for the purposes of disclosures required under applicable laws, including disclosures in offer documents relating to public issues of securities.

4. IDENTIFICATION OF GROUP COMPANIES

For the purposes of this Policy, the following entities may be considered as Group Companies of the Company:

A. Promoter Group Entities

Any company, body corporate, partnership firm, LLP or other entity forming part of the Promoter Group of the Company and required to be disclosed under applicable laws and regulations.

B. Companies Having Common Promoters

Companies in which the Promoters, members of the Promoter Group or persons in control of the Company exercise significant influence, control or substantial ownership interest.





C. Companies with Material Business Relationships

Entities having material business relationships, strategic associations or significant transactions with the Company, as determined by the Board.

D. Entities Having Common Control or Management

Entities that have common management, common control, common shareholding patterns or significant common directorships with the Company.

E. Subsidiaries, Associates and Joint Ventures

Subsidiaries, associate companies and joint ventures of the Company, if any.

5. EXCLUSIONS

The following may not ordinarily be considered as Group Companies merely by virtue of:

- a) Routine commercial transactions carried out in the ordinary course of business;
- b) Professional engagements with consultants, advisors, auditors, legal counsels or other service providers;
- c) Common directorships arising solely due to professional appointments without any controlling interest or significant influence; or
- d) Relationships that do not indicate common control, management or material influence.

6. REVIEW OF GROUP COMPANIES

The Board of Directors shall review the list of identified Group Companies periodically and whenever required for the purpose of any public issue, regulatory filing or material corporate transaction.

The Board may consider factors including:

- Shareholding patterns;
- Promoter relationships;
- Control and management rights;
- Material business transactions;
- Strategic influence; and
- Regulatory requirements applicable at the relevant time.

7. AUTHORITY OF THE BOARD

The Board shall have the authority to determine, include or exclude any entity from the list of Group Companies based on the facts, circumstances and applicable legal requirements prevailing at the relevant time.





The decision of the Board shall be final and binding for the purposes of this Policy.

8. DISCLOSURE

The list of Group Companies identified pursuant to this Policy shall be disclosed in the offer documents and such other regulatory filings as may be required under applicable laws.

9. REVIEW AND AMENDMENT

The Board may review, amend, modify or replace this Policy from time to time in accordance with applicable laws and regulatory requirements.

10. EFFECTIVE DATE

This Policy shall be effective from the date of its approval by the Board of Directors of Raj Polypack Limited.


