

**PAJSON AGRO INDIA LIMITED**



**PAJSON AGRO INDIA LIMITED**  
(Formerly Pajson Agro India Pvt Ltd)

# **POLICY FOR THE IDENTIFICATION OF GROUP COMPANIES**

**Dated 23.08.2025**

# PAJSON AGRO INDIA LIMITED

## MATERIALITY POLICY FOR THE IDENTIFICATION OF GROUP COMPANIES

### A. INTRODUCTION

This Policy has been formulated to define the materiality for identification of group companies, in respect of Pajson Agro India Limited (the "Company"), pursuant to the disclosure requirements under Schedule VI of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended from time to time ("SEBI ICDR Regulations").

This Policy has been adopted by the Board at its meeting held 23<sup>rd</sup> August, 2025 and has come into effect on the same date.

### B. APPLICABILITY AND OBJECTIVE

This policy shall be called the 'Policy on Identification of Group Companies' ("**Policy**"). The Company has adopted this Policy for identification and determination of Group Companies pursuant to the provisions of SEBI ICDR Regulations, details of which shall be disclosed in the Issue Documents.

"**Issue Documents**" means the Draft Red Herring Prospectus to be filed by the Company in connection with the proposed initial public offering of its equity shares with a designated stock exchange and the Red Herring Prospectus and Prospectus to be submitted to the Securities and Exchange Board of India, Registrar of Companies, [●] at ("**RoC**") and the stock exchange where the equity shares of the Company are proposed to be listed, as applicable.

All other capitalized terms not specifically defined in this Policy shall have the same meanings ascribed to such terms in the Issue Documents.

In this Policy, unless the context otherwise requires:

- (i) Words denoting the singular shall include the plural and vice versa.
- (ii) References to the words "include" or "including" shall be construed without limitation.

### C. POLICY PERTAINING TO THE IDENTIFICATION OF MATERIAL GROUP COMPANIES

In terms of the SEBI ICDR Regulations, the term 'group companies' includes (i) such companies (other than promoter(s) and subsidiary(ies)) with which there were related party transactions, during the period for which financial information is disclosed in the relevant offer documents, as covered under applicable accounting standards, and (ii) any other companies considered material by the board of directors of the relevant issuer company.

Therefore, as per the requirements of the SEBI ICDR Regulations, group companies shall include:

- (i) Company(ies) (other than the subsidiary(ies) and promoter(s)) with which there were related party transactions, during the period for which financial information is disclosed in the Issue Documents, as covered under the Indian Accounting Standard (Ind AS) 24, i.e., financial information for the period ended March 31, 2025, March 31, 2024 and March 31, 2023; and
- (ii) companies as considered material by the Board.

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In addition, pursuant to the Materiality Policy, for the purposes of (ii) above, a company (other than our Subsidiary and the companies covered under (i) above) shall be considered 'material' and will be disclosed as a 'group company', if such a company is:

- (i) a member of the Promoter Group; and
- (ii) with which our Company has entered into one or more transactions during the most recent financial year or stub period, as applicable, and such transactions, individually or in the aggregate, in value exceeds 10% of the total restated revenue from operations of our Company in the most recent financial year or relevant stub period, as applicable, based on the Restated Financial Information.

## **D. AMENDMENT**

The Board (including its duly constituted committees wherever permissible) shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy. This Policy shall be subject to review/changes as may be deemed necessary and in accordance with regulatory amendments from time to time.

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