POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

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1. Preface

This Policy has been formulated in accordance with the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

The Board of Directors of Juniper Green Energy Limited ("JGEL" or the "Company"), at its meeting held on November 20, 2025, approved and adopted this Policy in compliance with the aforesaid regulation and other applicable laws. This Policy shall come into effect from the date on which the equity shares of the Company are listed on the stock exchange(s).

2. Objectives

The objective of this Policy is to determine materiality of events or information relating to the Company and to ensure that such information is disseminated in accordance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, to enable investors to be updated with changes relating to the Company to take well-informed investment decisions.

3. Definitions

a) "**Act**" means the Companies Act, 2013 and the rules made thereunder, as amended, modified or re-enacted from time to time.
b) **"Board of Directors" or "Board"** means the Board of Directors of the Company.
c) **"Key Managerial Personnel"** means key managerial personnel as defined under sub-section (51) of section 2 of the Act.
d) **"Listing Regulations"** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.
e) **"Policy"** means this policy, as amended from time to time.
f) **"SEBI"** means the Securities and Exchange Board of India.
g) **"Stock Exchange"** means such stock exchange(s) where the equity shares of the Company are listed.

All other words and expressions used but not defined in this Policy, but defined in the SEBI Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

4. Guidelines for Determining Materiality of Events

A. Events or information which are deemed to be material events

The Company shall disclose events as specified in Para A of Part A of Schedule III of the Listing Regulations irrespective of application of any quantitative and qualitative materiality thresholds.

B. Events or information which are dependent on application of guidelines for materiality

The Company shall make disclosure of events specified in Para B of Part A of Schedule III of the Listing Regulations, based on application of the guidelines for materiality, as set out hereinbelow:

(i) **Quantitative criteria:** the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following: a) two percent of turnover, as per the last audited consolidated financial statements of the Company; b) two percent of the net worth, as per the last audited consolidated financial statements of the Company, except in case the arithmetic value of the net worth is negative; c) five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company.

(ii) **Qualitative criteria:** a) An omission of event or information which is likely to result in discontinuity or alteration of event or information already available publicly; or; b) the omission of an event or information which is likely to result in significant market reaction if the said omission came to light at a later date.

(iii) In case where the criteria specified in sub-clauses (i) and (ii) are not applicable, an event / information may be treated as being material if in the opinion of the Board of the Company, the event / information is considered material.

In determining materiality, a number of factors such as the nature of the information, prevailing market conditions, general business practices, industry scenario, business outlook, etc. shall also be taken into consideration.

C. Events of the Company to which neither Para A nor Para B of Schedule III of the Listing Regulations applies, shall be disclosed if such events are considered material by the Board/Authorised Person(s).

D. The Company shall disclose major developments that are likely to affect its business, e.g. emergence of new technologies, expiry of patents, any change of accounting Policy that may have a significant impact on the accounts, etc. and any other information which is exclusively known to the Company and which may be necessary to enable the holders of securities to review their position and to avoid establishment of a false market for equity shares of the Company.

5. Authorised Person(s)

The materiality or otherwise of an event or information in terms of the Listing Regulations will be determined severally by the Wholetime Director(s), Chief Executive Officer, Chief Financial Officer and the Company Secretary ("Authorised Person(s)") who will ensure disclosures are made to Stock Exchange(s) in accordance with the provisions of this Policy. Authorised Person(s) shall also verify market rumours and submit appropriate response / disclosures to the Stock Exchange(s), if required, as per applicable provisions of the Listing Regulations.

The Authorised Person(s) shall exercise his/her own judgment while assessing the materiality of events / information associated with the Company and also decide the appropriate period / stage at which disclosure is to be made to the Stock Exchange(s) including details that may be disclosed.

6. Disclosure Process

The Company shall disclose to the Stock Exchange(s) all events or information which are material in terms of the provisions of the Policy or Listing Regulations as soon as reasonably possible and in any case not later than the following:

(i) thirty minutes from the closure of the meeting of the board of directors in which the decision pertaining to the event or information has been taken;

Provided that in case the meeting of the board of directors closes after normal trading hours of that day but more than three hours before the beginning of the normal trading hours of the next trading day, the Company shall disclose the decision pertaining to the event or information, within three hours from the closure of the board meeting.

Provided further that in case the meeting of the board of directors is being held for more than one day, the financial results shall be disclosed within thirty minutes or three hours, as applicable, from closure of such meeting for the day on which it has been considered.

(ii) twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the Company;

(iii) twenty four hours from the occurrence of the event or information, in case the event or information is not emanating from within the Company:

Provided that if all the relevant information, in respect of claims which are made against the Company under any litigation or dispute, other than tax litigation or dispute, in terms of sub-paragraph 8 of paragraph B of Part A of Schedule III of the Listing Regulations, is maintained in the structured digital database of the Company in terms of provisions of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the disclosure with respect to such claims shall be made to the Stock Exchange(s) within seventy-two hours of receipt of the notice by the Company.

Provided further that disclosure with respect to events for which timelines have been specified in Part A of Schedule III of the Listing Regulations shall be made within such timelines.

Provided further that in case the disclosure is made after the timelines specified under the Policy or Listing Regulations, the Company shall, along with such disclosure provide the explanation for the delay.

(iv) The Company shall, with respect to disclosures referred to in the Policy or Listing Regulations, make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.

(v) In case an event or information is required to be disclosed by the Company in terms of the provisions of Listing Regulations, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

(vi) The Company shall disclose all events or information with respect to subsidiaries which are material for the Company.

(vii) Verification of Rumours:

Upon such applicability as per the Listing Regulations, the Company shall confirm, deny or clarify upon material price movement (as specified under the framework prescribed by Stock Exchanges) any reported event or information in the mainstream media which is not general in nature and which indicates that rumour of an impending specific event or information is circulating amongst the investing public, as soon as reasonably possible but in any case not later than twenty four hours from the trigger of material price movement or such other timelines as specified in the Listing Regulations.

Further, if the Company confirms the reported event or information, it shall also provide the current stage of such event or information.

(viii) The Authorised Person(s) may sign the disclosures to be sent to the Stock Exchange(s) and upload on the website for the purposes of fulfilling the obligations under the Listing Regulations.

7. Amendments

The Board may review, amend, modify or replace this Policy from time to time in accordance with applicable laws. Any subsequent amendment/modification in the Act or the rules framed thereunder or the Listing Regulations and/or any other laws in this regard shall automatically apply to this Policy.

8. Scope and limitation

In the event of any conflict between the provisions of this Policy and the Act or Listing Regulations or any other statutory enactments, modification or rules, the provisions of Listing Regulations / Act or statutory modification, enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to be severed from the Policy and the rest of the Policy shall remain in force.

9. Dissemination of policy

In accordance with the Listing Regulations, this Policy and the contact details of the Authorised Person(s) shall be disclosed on the website of the Company. Further, all events or information disclosed by the Company to the Stock Exchange(s) under the Listing Regulations shall be hosted on the Company's website and preserved thereon for a minimum period of five years and thereafter in accordance with the Company's archival policy.