



SIMRAN AGROVET LIMITED

CIN: U15400MP2017PLC043674

**POLICY ON IDENTIFICATION OF
GROUP ENTITIES**

1. INTRODUCTION:

This Policy has been formulated to define the materiality for identification of group entities in respect of SIMRAN AGROVET 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**”).

2. APPLICABILITY AND OBJECTIVE:

This policy shall be called the ‘**Policy on Identification of Group Entities**’ (“**Policy**”). This Policy shall be effective from the date of approval of this Policy by the Board.

The Company has adopted this Policy for identification and determination of Group Entities pursuant to the provisions of SEBI ICDR Regulations, details of which shall be disclosed in the Offer Documents.

“**Offer Documents**” means the Draft Red Herring Prospectus, the Red Herring Prospectus and the Prospectus to be filed by the Company in connection with the proposed initial public offering of its equity shares with the Securities and Exchange Board of India, Registrar of Companies, Gwalior, Madhya Pradesh (“**RoC**”) and stock exchanges 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 Offer Documents.

3. INTERPRETATION:

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.

4. POLICY PERTAINING TO THE IDENTIFICATION OF GROUP ENTITIES:

The Policy with respect to the identification of the group entities of our Company shall be as follows:

Identification of ‘Material’ Group Entities:

Requirement:

As per the requirements of the SEBI ICDR Regulations, Group Companies include such companies as covered under the applicable accounting standards (i.e. Indian Accounting

Standard 24 (“**Ind AS 24**”), as applicable) as per the restated consolidated financial statements for three (3) financial years and any subsequent stub period preceding the date of the Offer Document, which is included in such Offer Document and also any other companies as considered material by the board of directors of the Company.

Policy on Materiality:

Our Company is required to disclose certain matters in relation to its “group entities” in the Draft Red Herring Prospectus / Red Herring Prospectus / Prospectus. The SEBI Regulations define “group entities” as: “The words “group entities”, wherever they occur, shall include such companies/entities as covered under applicable accounting standards and also other companies as considered material by the board of the issuer.”

The Board discussed the matter and in its opinion ‘group entities’ shall mean and include only those companies/entities which constitute part of the related parties of the Company under the applicable accounting standards issued by the Institute of Chartered Accountants of India, being Indian Accounting Standard 24 (“Ind AS 24”), as per the restated consolidated financial statements of the Company for the last financial year (and any stub period in respect of which, audited financial statements are included in the relevant offer documents in connection with the proposed initial public offering of equity shares of the Company (the “Offer Documents”), such period collectively referred to as the “Relevant Period”) and also any other companies considered material by the Board.

5. 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.

6. DISCLOSURES:

The Company shall disclose this Policy in its Annual Reports & Website.

7. EFFECTIVE DATE:

The Policy shall become effective from the date of its adoption by the Board.