POLICY FOR THE DETERMINATION OF MATERIAL EVENTS OR INFORMATION

("Policy")

Hindustan Coca Cola Holdings Limited

Under Regulation 30(4)(ii) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

As approved by the Board of Directors vide Board Meeting dated September 09, 2026

This Policy is effective from -

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A. INTRODUCTION AND LEGAL FRAMEWORK

1. Hindustan Coca Cola Holdings Limited ("**Company**") is committed to being open and transparent with all stakeholders and believes in disseminating information in a fair and timely manner.

2. In terms of Regulation 30 read with Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**SEBI LODR Regulations**") , listed companies are required to make disclosures of events or information to stock exchanges which, in the opinion of the board of directors of the listed company, is material. Further, Regulation 30(4)(ii) of the SEBI LODR Regulations requires listed entities to frame a policy for the determination of materiality, in accordance with the criteria prescribed under the SEBI LODR Regulations.

3. The Board of Directors of the Company ("**Board**"), in compliance with Regulation 30(4)(ii) of the SEBI LODR Regulations, has adopted this Policy for the determination of materiality of events or information to be disclosed to the stock exchanges from time to time.

B. Industry Standards

1. The Company shall follow the Industry Standards issued by the Industry Standards Forum (ISF) pursuant to SEBI Circular No. SEBI/HO/CFD/CFD-PoD-2/P/CIR/2025/25 dated February 25, 2025, to ensure the compliance with Regulation 30 of SEBI LODR Regulations as amended from time to time.

C. OBJECTIVES

2. The Policy seeks to lay down the criteria for identifying and determining the materiality of events or information concerning the Company, and to ensure timely compliance by the Company with disclosure requirements as specified under the SEBI LODR Regulations.

3. The Policy further seeks to ensure that information provided by the Company to the market is timely, transparent, and equally accessible to all concerned stakeholders, including its shareholders; and to promote the confidence of investors in the quality of information which is provided and / or released by the Company.

D. DEFINITIONS & INTERPRETATION

The following definitions have been assigned to certain terms used in this Policy for effective interpretation:

1. "**Act**" means the Companies Act, 2013 and rules and regulations framed thereunder, and any amendments thereto.

2. "**Authorized Person**" shall mean any Key Managerial Personnel authorised by the Board to determine the materiality of an event or information and disclose any event or information to the stock exchanges in accordance with this Policy.

3. "**Board**" means the Board of Directors of the Company.

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4. "**Company**" means Hindustan Coca-Cola Holdings Limited.

5. "**Key Managerial Personnel**" shall have the meaning as defined under the Act.

6. "**Master Circular**" means the Master Circular for compliance with the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 by listed entities issued on July 11, 2024, as may be amended from time to time.

7. "**Mainstream Media**" shall include print or electronic modes of the following:

   (a) Newspapers registered with the Registrar of Newspapers for India;

   (b) News channels permitted by the Ministry of Information and Broadcasting under the Government of India;

   (c) Content published by the Publisher of news and current affairs content as defined under the Information Technology (Intermediaary Guidelines and Digital Media Ethics Code) Rules, 2021; and

   (d) Newspapers or news and current affairs content similarly registered or permitted or regulated as the case may be, in jurisdictions outside India.

8. "**SEBI LODR Regulations**" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as may be amended from time to time.

9. "**Subsidiary(ies)**" shall mean a subsidiary as defined under the Act.

All other words and expressions used but not defined in this Policy, but defined in the Securities and Exchange Board of India Act, 1992, the Act, 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. In any circumstance where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this Policy.

E. DISCLOSURE OF MATERIAL EVENTS OR INFORMATION

1. Events or information specified in Paragraph A of Part A of Schedule III of the SEBI LODR Regulations are deemed to be material under the SEBI LODR Regulations and the Company shall make disclosures of such events to the stock exchanges without application of any materiality thresholds within the timeframe which has been specified under the SEBI LODR Regulations and the Master Circular.

2. Events or information specified in Paragraph B of Part A of Schedule III of the SEBI LODR Regulations shall be disclosed by the Company to the stock exchanges within the timelines specified in the SEBI LODR Regulations and the Master Circular in accordance with the guidelines for materiality as specified in Regulation 30(4) of the SEBI LODR Regulations.

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3. Events or information specified in Paragraph C of Part A of Schedule III of the SEBI LODR Regulations, *viz.* major developments which are likely to affect the business of the Company, such as the emergence of new technologies, expiry of patents, any changes in accounting policy that may have a significant impact on the accounts, etc., brief details thereof and any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities, shall be evaluated in terms of materiality on a case to case basis and shall be disclosed within the timeframe prescribed by the SEBI LODR Regulations.

4. Without prejudice to the particulars specified in Clause D(1), Clause D(2) and Clause D(3) of this Policy, the Company may make disclosures of events or information as may be specified by the Board from time to time.

5. The events or information with respect to Subsidiaries of the Company, which are material to the Company, shall also be disclosed.

F. CRITERIA FOR DETERMINATION OF MATERIALITY

1. In the course of determining the materiality of any event or information, the Company shall apply the following criteria as specified under Regulation 30(4)(i) of the SEBI LODR Regulations:

   (a) the omission of an event or information, which is likely to result in discontinuity or alteration of any event or information already available publicly; or

   (b) the omission of an event or information is likely to result in a significant market reaction if the said omission came to light at a later date; or

   (c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:

      (i) 2% of turnover, as per the last audited consolidated financial statements of the Company;

      (ii) 2% of 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;

      (iii) 5% of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company.

   (d) in case where the criteria specified in sub-clauses (a), (b) and (c) of this Clause F(1) of this Policy is not applicable, an event or information may be treated as being material if in the opinion of the Board the event or information is considered as material.

2. For the removal of doubts, this Policy does not dilute any requirement of the SEBI LODR Regulations.

G. TIMELINES FOR THE DISCLOSURE OF EVENTS OR INFORMATION

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1. The Company shall ensure prompt disclosure of all material events or information to the stock exchanges as soon as reasonably possible, but not later than the timelines as prescribed under Regulation 30(6) of the SEBI LODR Regulations and the Master Circular.

2. In the event any disclosure with respect to material events or information is made after the timelines specified under the SEBI LODR Regulations, the Company shall, along with the disclosure, provide explanations for such delay.

H. DISCLOSURES

1. The Company shall, with respect to the disclosures made under the Policy, make disclosures updating material developments as may be required under law. The contents of the disclosure shall be as per guidance issued under the Master Circular, including such amendments as may be issued from time to time.

2. The Authorized Person(s) shall provide adequate reply to all queries raised by Stock Exchange(s) with respect to any event/information.

3. The Company shall disclose on its website at https://www.hccb.in/ all such events or information which have been disclosed to stock exchanges under this Policy and such disclosure shall remain hosted on the website of the Company for a minimum period of five years, and thereafter, the same shall be treated in accordance with policy on preservation of documents of the Company.

4. In case an event or information is required to the disclosed by the Company under applicable law 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 such a disclosure is prohibited by such authority.

5. In case an event occurs or information is available with the Company, which is not indicated in Paragraph A or Paragraph B of Part A of Schedule III, but which may have a material effect, the Company shall make adequate disclosures with respect to such event or information.

I. VERIFICATION OF MARKET RUMOURS

Upon the material price movement as may be specified by the stock exchanges, in case any event or information is reported in the Mainstream Media which is not general in nature, and which indicates that rumours of an impending specified material event or information are circulating amongst the investing public, the Company shall if obliged under applicable law confirm, deny or clarify such information as soon as reasonably possible and in such manner as specified in the SEBI LODR Regulations.[1]

J. AUTHORIZED PERSONS

[1] This requirement comes from a proviso to Regulation 30(11) of the SEBI LODR Regulations, however, it is only applicable to the top 100 listed entities and thereafter the top 250 listed entities, with effect from the date specified by the Board.

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In accordance with Regulation 30(5) of the SEBI LODR Regulations, the Board shall authorize specific Key Managerial Personnel (collectively referred to as the **Authorized Persons**) to determine the materiality of an event or information and appropriately disclose any event or information (whether material or otherwise) to the stock exchanges so as to ensure compliance with this Policy. The contact details of the Authorized Persons shall be disclosed to the stock exchanges and made available on the website of the Company.

K. REVIEW OF POLICY AND AMENDMENTS

This Policy shall be reviewed and accordingly amended by the Board from time to time so that it remains compliant with the applicable law. Notwithstanding anything contained to the contrary herein, this Policy shall automatically stand amended to incorporate any changes to the requirements prescribed under applicable law to the extent that such provision does not require the Board to exercise its discretion. If there is any change in provisions of applicable law that requires the Board to exercise its discretion, the Board shall promptly review such provisions and adopt any changes to the Policy as it may deem fit.

L. COMPLIANCE

The Company Secretary and Compliance Officer of the Company shall be responsible for supervision of the Policy.

Any queries regarding this Policy may be referred to the Company Secretary and Compliance Officer as defined above, who is in charge of administering, enforcing and updating this Policy.

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