



## **POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS/INFORMATION TO BE DISCLOSED TO STOCK EXCHANGES**

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### **1. OBJECTIVE**

- 1.1 As per Regulation 30 read with Schedule III of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (the “Regulations”), the Company shall make disclosures to the Stock Exchanges, of any events or information which, in the opinion of the board of directors of the company, is material. Further, as per the Regulations, events and information set out in Para A of Part A of Schedule III of the Regulations, are deemed to be material; whereas, for the events and information set out in Para B of Part A of Schedule III of the Regulations, the Company shall frame policy for determining materiality of event/information for disclosure to the Stock Exchanges.
- 1.2 Objective of this policy is therefore to lay down the criteria for identification/determination of materiality of events/information set out in part B of the Schedule III of the Regulations, that shall be disclosed to Exchange upon occurrence and designate /authorize officials to determine materiality of the event/information.

### **2. EVENTS/INFORMATION DEEMED TO BE MATERIAL**

Events/information listed out in Para A of Part A of Schedule III of the Regulations are deemed to be material without applying materiality criteria and Company shall disclose the same to the Stock Exchanges and on the website of the company within the prescribed time.

### **3. FACTORS TO BE CONSIDERED FOR DETERMING MATERIALITY OF OTHER EVENTS/INFORMATION**

Events/information listed out in Para B of Part A of Schedule III of the Regulations shall be disclosed after applying the guidelines for materiality referred sub-regulation (4) of regulation (30) and reproduced below, and the materiality criteria laid down in para 4 below:

- (a) The omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly;
- (b) The omission of an event or information is likely to result in significant market reaction on Company’s securities, if the said omission came to light at a later date;
- (c) In case where the criteria specified in (a) or (b) above are not applicable, an event/information may be treated as being material if in the opinion of the Board of Directors of the Company, the event/information is considered material.



#### **4. MATERIALITY CRITERIA**

4.1 Criteria for determination of materiality of events/information referred in para 3 above:

- (a) Taking above Guidelines into consideration, Company will consider any event/information/forensic audit initiated, to be material for disclosure to the Stock Exchanges, if such event/information/audit is likely to have impact of more than 10% of company's revenue or 10% of net-worth, whichever is lower, based on consolidated audited financial statements of previous financial year.
- (b) Materiality of all the events/ information with respect to subsidiaries shall be determined after applying above criteria.

4.2 All the events/information considered material after applying above criteria shall be disclosed to Stock Exchanges and on the website of the company as prescribed in the Regulations.

#### **5. PERSONS AUTHORISED TO DETERMINE MATERIALITY**

The Board of Directors of the Company have authorised the Managing Director and in his absence the Chief Financial Officer and in the absence of both of them, the Company Secretary to determine materiality of event or information that has taken place, on the basis of above criteria, for the purpose of making disclosure to the Stock Exchanges.

#### **6. REVIEW AND AMENDMENT**

The Board may monitor, review and amend the Policy from time to time as also whenever necessitated due to amendments in the Regulations.

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