

## **Policy for determination of materiality**

This policy is to determine the authority to take a view on the materiality of an event that qualifies for disclosure under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 to decide the appropriate time at which such disclosure is to be filed with Stock Exchanges and on its corporate website, details that may be filed in the best interest of present and potential investors. The authority should be of any of the Key Managerial Personnel including all Executive Directors.

### **Definitions:**

“**Listing Regulations or LODR**” means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and including any amendment or modification thereof.

“**Key Managerial Personnel**” means Key Managerial Personnel (KMP) as defined under the Companies Act, 2013. and includes Non-Executive Chairperson of the Company.

“**Material**” means disclosures of any events or information which under the requirement of SEBI Regulations / Stock Exchanges are considered to be material.

### **Objectives:**

1. The policy objects to disseminate material events to Stock Exchanges & website of the Company for better corporate governance.
2. It also objects to help the investors for better decision making with dissemination of Price Sensitive material information and which could materially affect the working of the Company.

### **Requirements & Disclosure of events:**

As per Listing Regulations, events specified in Para A of Part A of Schedule III are deemed to be material events and listed entity shall make disclosure of such events. The listed entity shall make disclosure of events specified in Para B of Part A of Schedule III, based on application of the guidelines for materiality.

The information which may be construed as ‘**Material**’ but not limited to the following may be decided by any of Key Managerial Personnel as material for disclosure to the Stock Exchanges and on the corporate website of the Company:

1. Disclosure content to report Change in General Character of Business.
2. Disclosure content to report disruption of operations due to natural calamity.
3. Disruption of operations of any one or more units or division or subsidiary of the listed entity due to events such as strikes, lockouts etc.
4. Disclosure on commencement or closure of commencement operations.
5. Disclosures regarding pricing/realization/profitability arising out of change in the regulatory framework.

6. Disclosure relating to Litigation/dispute/regulatory action with a material impact.
7. Litigation/dispute/regulatory action with a material impact.

For the purpose of “Material impact”, it shall mean all such impact which may be determined as Material by the Management from time to time.

8. Revision in Ratings.
9. Disclosures relating to any other information having bearing on the operation/performance of the Company as well as price sensitive information, which includes but not restricted to;
  - I. Issue of any class of securities.
  - II. Acquisition, merger, de-merger, amalgamation, restructuring, scheme of arrangement, spin off or selling divisions of the Listed Entity, delisting, redemption/ cancellation/retirement of any securities issued by the Listed Entity.
  - III. In case of issuance of depository receipts (ADR/GDR) or FCCB the listed entity shall disclose following additional details to the Stock Exchange(s).
10. Cancellation of dividend /rights/bonus, etc.
11. Events or information with respect to subsidiaries which are material for the listed entity.

### **Amendment**

The Company reserves its right to amend or modify this policy as per change in the Listing Regulations by the Securities and Exchange Board of India in whole or in part, at any time without assigning any reason whatsoever.