



Determination of Materiality of Events/ Information (pursuant to Regulation 30(4)(ii) of the SEBI (Listing Obligations and Disclosures Requirements) Regulations 2015

Objective

This Policy is framed in accordance with the requirements under Regulation 30 of SEBI (Listing Obligations and Disclosures Requirements) Regulations 2015 (“Regulations”). The objective of the Policy is to determine materiality of events or information so as to ensure that such information is adequately disseminated in pursuance of the Regulations.

The policy shall be applied to determine the materiality in respect of the following types of event/information as laid down under Para B of Part A of Schedule III to the New Regulations and described in detail in Annexure I of SEBI’s Circular dated September 09, 2015, on Regulation 30 of the Regulations as amended vide SEBI’s Circular dated June 14, 2023

Events which shall be disclosed upon application of the Guidelines for Materiality as referred in Regulations

1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2. Any of the following events pertaining to the listed entity:
 - arrangements for strategic, technical, manufacturing, or marketing tie -up; or
 - adoption of new line(s) of business; or
 - closure of operation of any unit, division or subsidiary (in entirety or in piecemeal)
3. Capacity addition or product launch.
4. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
5. Agreements (viz. loan agreement(s) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
6. Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
7. Effect(s) arising out of change in the regulatory framework applicable to the listed entity



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8. Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the listed entity
9. Frauds or defaults by employees of the listed entity which has or may have an impact on the listed entity.
10. Options to purchase securities including any ESOP/ESPS Scheme
11. Giving of guarantees or indemnity or becoming a surety [, by whatever named Called for any third party.
12. Granting, withdrawal , surrender , cancellation or suspension of key licenses or regulatory approvals.
13. Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority

Authorization for determination of Materiality of events or transaction or information

Managing Director shall be the authority entitled to take a view on the materiality of an event that qualifies for disclosure and the Key Managerial Personnel (KMP) shall disclose the said information to the Stock Exchange.

Events or information, whose value or the expected impact in terms of value, exceeds the lower of the following: i) 2% of turnover as per last audited consolidated financial statements; ii) 2% of net worth as per last audited consolidated financial statements (not applicable if in negative); iii) 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 listed entity

In cases where the criteria laid down under the policy are not directly applicable, an event/ information shall be treated as being material, if in the opinion of the Board of Directors, the said event / information is considered material.

Explanation-The average of absolute value of profit or loss is required to be considered by disregarding the 'sign' (positive or negative) that denotes such value as the said value / figure is required only for determining the threshold for 'materiality' of the event and not for any commercial consideration

Power of the Board of Directors

Managing Director subject to the approval of the Board of Directors reserves the right to amend or modify this Policy at any time