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POLICY ON DETERMINATION AND DISCLOSURE OF MATERIALITY OF EVENTS

Regulation 30(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Regulations') requires every listed entity to frame a policy for determination of materiality of events and information that requires appropriate disclosure to the stock exchanges. The Company has framed the under mentioned Policy on determination and disclosure of Materiality of Events:

- 1- Materiality has to be determined on a case to case basis depending on specific facts and circumstances relating to the information/event. In order to determine whether a particular event/information is material in nature, the Company shall consider the criteria(s) mentioned below:
 - A- The Company shall make disclosures of any events or information which, in the opinion of the board of directors of the listed company, is material.
 - B- Events specified in Para A of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 are deemed to be material events and the Company shall make disclosure of such events.
 - C- The Company shall make disclosure of events specified in Para B of Part A of Schedule III, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 based on following criteria for determination of materiality of events/ information:
 - (a) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
 - (b) the omission of an event or information is likely to result in significant market reaction if the said omission came to light at a later date;
 - (c) In case where the criteria specified in sub-clauses (a) and (b) are not applicable, an event/information may be treated as being material if in the opinion of the board of directors of listed entity, the event / information is considered material.

2- Guidance on occurrence of event / availability of information

- (a) The timing of occurrence of an event and/or availability of information has to be decided on a case to case basis.
- (b) In case of natural calamities, disruptions etc. the events/ information can be said to have occurred when the Company becomes aware of the information.
- (c) In matters which would depend on the stage of discussion, negotiation or approval, the events/information can be said to have occurred upon receipt of approval by the Board of Directors or after receipt of approval of the Board of Directors and shareholders, as the case may be.

3- Implementation

- (a) To give effect to the requirements under the Regulations, the Board has authorized the Team comprising of the Chief Financial Officer and the Company Secretary of the Company to determine jointly the materiality of an event / information and disclose the same to the stock exchanges
- (b) In cases where the materiality of an event / information cannot be determined on the basis given above, the said Team may consult the Chairman & Managing Director / Executive Directors of the Company, as the case may be, before disclosing the event / information to the stock exchanges.

4- Disclosure

- (a) Disclosure of events relating to “Outcome of meetings of the Board of Directors” shall be made within thirty minutes of the closure of the Board Meeting at which such events were considered or discussed. The intimation of outcome of meeting of the Board of Director shall also contain the time of commencement and conclusion of the Meeting.
- (b) All other events shall be disclosed as soon as reasonably possible and not later than twenty four hours from the occurrence of event or information. The Company shall explain to the Stock Exchanges any delay in such disclosure beyond twenty four hours of the occurrence of the event or information.
- (c) The disclosure of events/information of price sensitive nature (such as decision on declaration of dividend) shall be made on receipt of approval of the event by the Board of Directors pending the shareholder’s approval.

- d) The Company shall ensure that the updated disclosure with respect to the material event/ information is made to the stock exchanges on a regular basis till such time the event/ information is resolved / closed, with relevant explanation.
- e) The Company shall also disclose all events or information with respect to subsidiaries which are material for the company.