

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

I. STATUTORY MANDATE & OBJECTIVE

In compliance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, Company has laid down procedures to determine the materiality of the events & information and disclose the material events to the Stock Exchanges. The Board of Directors of the Company shall periodically review the materiality policy of the Company.

II. DISCLOSURE OF EVENTS OR INFORMATION

The Company shall make disclosures of any events or information which are material according to Board of directors of the Company or person delegated by the Board of Directors in this regard.

(A) Upon occurrence of Events, as specified in Para A of Part A of Schedule III of SEBI (LODR) Regulations, 2015, the Company shall forthright make disclosure of such events without any application of guidelines for materiality.

(B) Upon occurrence of Events, as specified in Para B of Part A of Schedule III of SEBI (LODR) Regulations, 2015, the Company shall make disclosure of such events based on the guidelines for materiality .

(C) Any other information /event viz. new technologies, any change of accounting policy that may have a significant impact on the accounts of the Company, etc. and 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 listed entity to appraise its position and to avoid the establishment of a false market in such securities.

(D) All events or information with respect to Subsidiaries/ Associates, if any, which are material for the Company shall be disclosed to the Stock exchanges.

Without prejudice to the generality of events specified in above, the Company s make disclosures of event/information as specified by SEBI from time to time.

III. CRITERIA FOR DETERMINING MATERIALITY OF EVENTS / INFORMATION

- All the omission. of an event or information, which is likely to result in discontinuity or alteration of event or information already available publically; or
- 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; or
- In case where the criteria specified in sub clauses (a) & (b) are not applicable, an event/information may be treated as being material if in the opinion of the board of directors, the event/ information is considered material.

IV. AUTHORITY & TIME FRAME TO DISCLOSE EVENTS

1. The company shall authorize the Board of Directors or any Key Managerial Personnel for the purpose of determining materiality of an event or information and for the purpose of making disclosures to the Stock Exchanges.
2. The contact details of such authorized personnel will be disclosed as required under the Regulations including on the company's website.
3. The Company shall first disclose to stock exchange(s) of all events / information, as specified in **para A of Part A of Schedule III**, as soon as reasonably possible and not later than twenty-four hours from the occurrence of event or information.
4. Outcome of Board meetings shall be disclosed within 30 minutes of the closure of the Board meeting.
5. Any material developments on any event disclosed to the stock exchanges shall be updated on regular basis till such event is resolved.
6. All disclosures made to the Stock exchange shall be disclosed on the company's website all such events for a minimum period of five 3 years and thereafter as per the archival policy of the Company.
