

Policy on Materiality of Events & Information Transactions

MATERIAL EVENTS

Material Events means the individual transaction or arrangement which, in the opinion of the Authorised Key Managerial Personnel is significant to the operations or performance of the Company as well as any price sensitive information.

PRICE SENSITIVE INFORMATION

“Price-sensitive information” means any information which relates, directly or indirectly, to the Company that is not generally available and which upon becoming generally available is likely to materially affect the price of securities of the Company.

Stock Exchanges means BSE Limited where the Equity Shares of the Company are listed.

INTERPRETATION

Terms that have not been defined in this policy shall have the same meaning assigned to them in the SEBI (LODR) Regulations and Companies Act, 2013 as amended from time to time.

POLICY

The Company will as soon as reasonably possible inform the Stock Exchange(s) of all the events or information which will have material impact on the performance/operations of the Company, as well as any price sensitive information. The Authorised Key Managerial Personnel shall be entitled to take a view on the materiality of an event or information which are qualifying for disclosure as provided in Para B of Part A of Schedule III of the SEBI (LODR) Regulations and to decide the appropriate time at which such disclosure is to be made with the Stock Exchange(s) and details that may be disclosed in the best interest of present and potential investors.

REPORTING AND DISCLOSURE

Regulations 30 of SEBI [LODR] Regulations, 2015, have categorized material events and information which will have bearing on the performance/operations of the Company. The disclosures of events and information which the Company shall make to the Stock Exchange(s) as broadly categorized under these regulations are as under. Events in category A shall be disclosed to Stock Exchanges without any application of the guidelines for materiality i.e. these are mandatorily to be disclosed irrespective of the extent of happening of event. ii. Events that have been provided in category B shall be disclosed to Stock Exchanges upon application of the guidelines for materiality to be determined by the Authorised Key Managerial Personnel on the basis of criteria as mentioned in Regulation 30(4). Any other material event or information as per Category C, which have not been covered under category A & Category B, shall also be disclosed to the Stock Exchanges upon application of guidelines for materiality to be determined by the Authorised Key Managerial Personnel on the basis of criteria as mentioned in Regulation 30(4).

CRITERIA FOR DETERMINING MATERIALITY OF EVENTS/ INFORMATION

The omission of an event/ information, which is likely to result in discontinuity or alteration of event or information already available publicly 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; iii. In case where the criteria specified in sub-clause (i) and (ii) 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.

IMPLEMENTATION

Company will adhere to highest standards with regard to the implementation of this policy. The Whole-time Director and Compliance Officer of the Company shall have overall responsibility for implementing of this policy and shall take internal/external approvals, wherever necessary.

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.