

Policy for materiality of events and informations.

Compulsory Disclosure

The Company shall disclose the following events or information without any application of the guidelines for materiality-

1. Acquisition(s) (including agreement to acquire), scheme of arrangement, or sale or disposal of any units, division(s) or subsidiary of the Company or any other restructuring
Explanation – For the purpose of this clause, the word acquisition shall mean-
 - (a) Acquiring control, whether directly or indirectly; or
 - (b) Acquiring or agreeing to acquire shares or voting rights in, a company, whether directly or indirectly, such that-
 - (i) The Company holds shares or voting rights aggregating to five percent or more of the shares or voting rights in the said company, or
 - (ii) There has been a change in holding from the last disclosure made under sub-clause (i) of clause (b) of the explanation above and such change exceeds two percent of the total shareholding or voting rights in the said company.
2. Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.
3. Revision in Rating(s).
4. Outcome of Meetings of the Board of Directors, within 30 minutes of the closure of the meeting, held to consider the following:
 - (a) Dividend and/or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched;
 - (b) Any cancellation of dividend with reason thereof;
 - (c) The decision on buyback of securities;
 - (d) The decision with respect to fund raising proposed to be undertaken;
 - (e) Increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched;
 - (f) Reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to;
 - (g) Short particulars of any other alterations of capital, including calls

- (h) Financial results;
 - (i) Decision on voluntary delisting by the Company from stock exchanges(s).
5. Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the Company), agreement(s)/treaty(ies)/contract(s) with media companies, which are binding and not in normal course of business, revision(s) or amendment(s) or amendment(s) and termination(s) thereof.
 6. Fraud/defaults by promoter or key managerial personnel or by the Company or arrest of key managerial personnel or promoter.
 7. Change in directors, key managerial personnel, Auditor or Compliance officer.
 8. Appointment or discontinuation of share transfer agent.
 9. Significant corporate debt restructuring.
 10. Significant one time settlement with bank.
 11. Reference to BIFR and winding-up petition filed by any party/creditors.
 12. Issuance of notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the Company.
 13. Proceedings of Annual and Extraordinary general meetings of the Company
 14. Amendments to memorandum and articles of association of Company, in brief.
 15. Schedule of Analyst or institutional investor meet and presentations on financial results made by the Company to analysts or institutional investors.

Discretionary Disclosure based on application of guidelines

The Company shall disclose the following events or information on the basis of application of the guidelines for materiality, as specified below

1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.

2. Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division.
3. Capacity addition or product launch.
4. Awarding, bagging/receiving, amendment or termination of awarded/bagged orders/contracts not in normal course of business.
5. Agreements (viz. loan agreements, as a borrower) or any other agreements which are binding and not in the normal course of business.
6. Disruption of operations of any one or more units or division of the Company 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 Company.
8. Litigation(s) / dispute(s) / regulatory framework applicable to the Company.
9. Fraud / defaults etc. by directors (other than key managerial personnel) or employees of Company.
10. Options to purchase securities including any ESOP/ESPS scheme.
11. Giving of guarantees or indemnity or becoming a surety for any third party.
12. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
13. Any other event or information that is likely to affect business of the Company and other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities.

Guidelines for determining the materiality of Events or informations.

The Company shall consider the 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 clause (a) and (b) above are not applicable, an event / information may be treated as being material if in the opinion of the board of directors of the Company, the event / information is considered material.

Authorisation for determining the materiality of event or information

Shri Shobhit Charla Wholetime Director of the Company is authorized to determine the materiality of events or information for the purpose of making disclosure to Stock Exchange under Regulation 30 of SEBI (Listing obligation and Disclosure Requirements) Regulation, 2015”