

PADMANABH ALLOYS & POLYMERS LIMITED

POLICY FOR DETERMINATION OF MATERIALITY AND

DISSEMINATION OF INFORMATION

1. Purpose:

This Policy is framed in accordance with the provisions of Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) for determination of materiality, based on criteria specified in these Regulations for dissemination of information to the investors/other stakeholders.

The objective and purpose of this Policy is to determine materiality of events or information relating to the Company and its business operations to ensure that such event or information is timely and adequately disclosed and disseminated to the all the stakeholders of the Company in pursuance of the Listing Regulations and, generally to provide an overall governance framework for such determination of materiality.

This Policy lays down various criteria adopted by the Company in accordance with the Listing Regulations for determining materiality of an event/ information and document a process for dissemination of information and disclosures to various stakeholders through appropriate channels.

2. Material Event or Information:

• **Deemed Material Events under the Listing Regulations**

Events/information listed in Para A of Part A of Schedule III of Listing Regulations shall be deemed as Material and the Company shall make disclosure of such events/information to the stock exchange within the time limit as prescribed under the Listing Regulations.

The Company shall make disclosures updating Material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations;

The Company shall provide adequate reply to all queries raised by stock exchange(s) with respect to any events or information. Further, Company at its own discretion shall confirm or deny any event or information to stock exchange(s) reported in the media; and

All the above disclosures would be hosted on the website of the Company for a minimum period of five years and thereafter archived as per Company's policy for Preservation and Archival of Documents.

- **Criteria for Determination of Materiality of Events/ Information:**

The Company shall make disclosure of events/ information to the Stock Exchange based on application of guidelines for determining Materiality and /or as prescribed under the Listing Regulation.

Following additional criteria shall be considered for determination of materiality of events/ information other than for the Deemed Material Information

- (a) the event or information is in any manner of unpublished price sensitive information;
- (b) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly;
- (c) 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;
- (d) Any other event/information which has a potential impact on the business of the company.

Provided that, the Whole-time Director is authorized to exercise the discretion to decide not to make disclosure of specific information/event falling within the aforesaid criteria, if he is of the opinion that any such disclosure shall be directly/indirectly detrimental to the interest of the Company.

In cases where the above guidelines for determining materiality cannot be applied; the Whole-time Director, as per guidance received from the Board of Directors shall frame an opinion based on facts and circumstances on whether any information/events requires disclosures and extent of such disclosures.

3. Approval Process and Authority :

The Whole-time Director shall be authorised to determine materiality of an event or information, verifying or denying rumours and approve disclosure to the Stock Exchange and on the Company Website.

The Company Secretary shall be authorised to make the disclosure of any material information duly approved by the Chairman/Whole-time Director to the Stock Exchange, and on the Company Website.

Other Employees and Company representatives receiving any inquiries from the investment community shall not respond to such inquiries other than to refer the inquirer to the Chairman/Whole-time Director.

4. Review of this Policy :

This Policy shall be subject to review by the Board of Directors at such intervals as may be deemed necessary. Changes (if any) recommended by the Committee shall be placed before the Board for its approval.
