



POLICY ON DETERMINATION OF MATERIALITY

Background:

As per Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (herein after referred to as SEBI Listing Regulations), a listed entity is required to frame a policy for determination of materiality for disclosure of events or information to Stock Exchanges, based on the criteria specified in Regulation 30 of the said Regulations and the same is also required to be disclosed on the Company's website.

Policy:

Pursuant to regulation 30 of the Listing Regulations, the Board adopts following policy for determination of materiality.

1. The Company shall make disclosure of any events or information which in the opinion of the Board of Directors of the Company, is material.
2. The events specified in Para A of Part A of Schedule III are deemed to be material events and the Company shall make disclosure of such events.
3. The Company shall consider the following criteria for determination of materiality of event or information:
 - (a) the omission of an event or information, 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) 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 the Company, the event / information is considered material.
4. The Whole-Time Director, Chief Financial officer (CFO) and Company Secretary shall jointly deal with the determination, dissemination and disclosure of material event or information.
5. This Policy is subject to review from time to time.

Archival of Information:

Every material event or information, which has been disclosed to the Stock Exchange, shall be uploaded on the website of the Company and shall be retained for a period of 5 years, after which it shall be scrapped or archived or retained, as may be decided by the Compliance officer of the Company. Archived information will be maintained in safe and secure place to ensure timely and proper retrieval as when necessary.