

**DETERMINATION OF MATERIALITY THRESHOLD FOR DISCLOSURE  
OF EVENTS**

[Pursuant to SEBI (LODR) Regulations 2015]

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## **1. PREAMBLE:**

This policy (“Policy”) of Sahyadri Industries Limited (“Company”) has been prepared and adopted in accordance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR”) read with SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018.

Regulation 30(4) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires every Listed Company to disclose events or information which, in the opinion of the Board of Directors of a Company is material.

## **2. OBJECTIVES OF THIS POLICY:**

- To determine the materiality of an event or information;
- To ensure timely, accurate, uniform and transparent disclosure of all such events or information considered material as per this policy.

## **3. MATERIALITY CRITERIA:**

The Company shall consider the events or information as material (“materiality criteria”) based on following criteria:

- The omission of an event or 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;

## **4. DETERMINATION OF MATERIALITY OF EVENT OR INFORMATION:**

- The events or information specified in Para A of Part A of Schedule III of SEBI (LODR) Regulation 2015 will be considered as deemed material events and thus will be disclosed to the Stock Exchanges without application of the materiality criteria.
- The events or information specified in Para B of Part A of Schedule III of SEBI (LODR) Regulation 2015 will be disclosed based on application of the materiality criteria.
- In addition to the above, Para C and Para D of Schedule III of SEBI LODR requires the disclosure of the following:
  - i. Major development that is likely to affect business, e.g. emergence of new technologies;
  - ii. Expiry of patents if any

- iii. Any change of accounting policy that may have a significant impact on the accounts, etc.;
- iv. Any other information which is exclusively known to the Company and which may be necessary to enable the holders of the securities of the Company to appraise its position and avoid establishment of any false market in such securities; and
- v. Any other disclosure as may be specified by SEBI from time to time.

## **5. AUTHORITY TO MAKE DISCLOSURES:**

As per SEBI (LODR) Regulations 2015, the Board of directors has authorized the following persons to determine materiality of an event or information in terms of this policy and to make appropriate disclosure to the stock exchanges.

- Any Executive Director;
- Chief Financial Officer;
- Company Secretary

### **The authorized personnel shall ensure the following:**

- i. Determine the materiality of an event or information for the purpose of making disclosures to Stock Exchanges.
- ii. Give specific and adequate reply to all queries raised by the stock exchanges with respect to any event or information.
- iii. Voluntarily confirm or deny any reported event or information to stock exchanges.
- iv. Unless hindered by any unavoidable circumstances, shall disclose information to the respective authorities within the time limit given in the acts or regulations.
- v. In case of an ongoing material event or information, make disclosures updating material development on a regular basis, till such time an event is resolved or closed, with relevant explanations.

-----*End of the Policy*-----