



POLICY FOR DETERMINATION OF MATERIAL EVENTS & INFORMATION

Introduction

Regulation 30(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Listing Regulations' or 'LODR') requires every listed entity to frame a policy for determination of materiality of events and information that requires appropriate disclosure to the Stock Exchanges.

Accordingly, Alankit Limited ('AL' or the 'Company') herein sets out a Policy for determination of materiality of events and information and disclosure thereof and Web Archival Policy (hereinafter referred to the 'Policy').

The Policy was applicable to the Company with effect from 01st December, 2015 and updated on 14th February, 2023.

Purpose

The provisions of LODR mandate that every listed entity shall make disclosures of any event or information which, in the opinion of the Board of Directors of the listed entity is material. LODR divides such events/information that need to be disclosed broadly into the following categories –

- Event/information that have to be necessarily disclosed without application of any test of materiality and such events have already been specified by SEBI as such in LODR and
- Event/information that should be disclosed by the listed entity, if considered material, i.e., upon the applicability of the test of materiality and as indicated by SEBI in LODR.
- Events/information that have to be disclosed if the event/information viz. major development etc. which is likely to affect business.

The purpose of this Policy is to determine the materiality of any event or information or to identify such event or information which may not be material but sensitive enough requiring its disclosure to the Stock Exchanges in terms of the requirements of Regulation 30 read with Schedule III of LODR.

Materiality Assessment

For the purpose of this Policy, any of the events or information as defined in Schedule III of the Listing Regulations shall be considered significant to the operations and performance of the Company and be deemed to be material and hence need disclosure to Stock Exchanges.

Event/information based on Qualitative Impact –

- 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;
- any other event/information may be treated as being material if in the opinion of the Board of Directors of Company, the event / information is considered material.

Event/information based on Quantitative Criteria–

Any event/information that has a financial impact or is likely to have a financial impact of 10% or more on the consolidated turnover of the Company, in the immediately preceding financial year.

The quantitative criteria shall be read in conjunction with the qualitative criteria for determining materiality and arriving at the overall decision on the event to be reported.

Without prejudice to the generality of the foregoing, the Company may make disclosures of any event/information as specified by SEBI from time to time. In case any event/information is available with the Company, which has not been indicated above but which may have material effect on the Company then the Company is required to make adequate disclosure to the Stock Exchanges in this regard.

Events/Information with respect to Subsidiaries

The listed entity shall disclose all events or information with respect to subsidiaries which are material for the listed entity.

Disclosure of any other event/information

The Company shall also disclose the following events / information to the Stock Exchanges –

- Event/information viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any 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.
- Any event/information as may be specified by SEBI from time to time.

Timing of Disclosure

- Event/information with respect to outcome of meetings of the Board of Directors shall be disclosed within 30 minutes of the conclusion of Board Meeting.
- All other events that are required to be disclosed as per this Policy and SEBI LODR shall be disclosed as soon as reasonably possible and not later than twenty four hours from the occurrence of the event or information.

Disclosures updating materials developments

The Company shall, with respect to the disclosures referred to above, make disclosures updating material developments on a regular basis, with relevant explanations, till such time the concerned event is resolved/closed.

Uploading of the disclosures made to Stock Exchange(s) on the Website of the Company

The Company shall disclose on its website all such events or information which has been disclosed to Stock Exchange(s) under this Policy and such disclosure shall remain hosted on the website of the Company for a minimum period of five years and thereafter the same shall be treated as per the Company's Policy for Preservation of Documents and Archival.

Officer Responsible

The Compliance Officer of the Company shall be responsible for determining the materiality of an event and ensuring overall compliance of this Policy.

Limitation and Amendment

In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.