

POLICY FOR DETERMINATION OF MATERIAL EVENTS & INFORMATION

Introduction

This policy has been framed in accordance with the Regulation 30 of Listing Regulations laid down by SEBI after taking into consideration all the modifications and amendments made in the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.

This Policy applies in respect of disclosure of material events and information to the Stock Exchanges, set out in the Regulations.

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.

OBJECTIVE OF THE POLICY

1. To ensure that the information disclosed by the Company is adequate, accurate, timely and transparent.
2. To ensure that corporate documents and public statements are accurate and do not contain any misrepresentation.
3. To provide a framework that supports and fosters confidence in the quality and integrity of information released by the Company.
4. To ensure uniformity in the Company's approach to disclosures, raise awareness and reduce the risk of selective disclosures.

LEGAL REQUIREMENTS

The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, ("Listing Regulations") 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 needs 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.

TYPE OF INFORMATION

The information covered by this Policy shall include “information related to the Company's business, operations, or performance which has a significant effect on securities investment decisions” (hereinafter referred to as “material information”) that the Company is required to disclose in a timely and appropriate manner by applying the guidelines for assessing materiality. Events or information specified in Para B of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed based on application of materiality criteria.

Events or information specified in Para A of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed without any application of the guidelines for materiality.

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 Company shall consider the criteria as specified in Clause (i) of Sub-regulation (4) of Regulation 30 of the Listing Regulations for determination of materiality of events/ information as under:

(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; or

Event/information based on Quantitative Impact –

(c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:

(1) two percent of turnover, as per the last audited consolidated financial statements of the company;

(2) two percent of net worth, as per the last audited consolidated financial statements of the company, except in case the arithmetic value of the net worth is negative;

(3) five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the company;

In respect to the above, the average of absolute value of profit or loss is required to be considered by disregarding the ‘sign’ (positive or negative) that denotes such value as the said value / figure is required only for determining the threshold for ‘materiality’ of the event and not for any commercial consideration.

(d) In case where the criteria specified in sub-clauses (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the Board of Directors or Chairman & Managing Director, the event or information is considered material.

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.

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.

However in case the meeting of the board of directors closes after normal trading hours of that day but more than three hours before the beginning of the normal trading hours of the next trading day, the listed entity shall disclose the decision pertaining to the event or information, within three hours from the closure of the board meeting:

- The event or information emanating from within the listed entity shall be disclosed within Twelve hours from the occurrence of the event or information
- The event or information emanating from within the listed entity shall be disclosed within Twenty Four hours from the occurrence of the event or information

Or

The Company shall disclose all events or information within the timelines specified in the Applicable Laws and Regulations.

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.

Effective Date

This policy is amended by the Board of Directors in their meeting held on 30th January, 2025 and will be effective from the date of such approval.

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.

Note: In case of any ambiguity arising in any matter shall be dealt with by the committee and appropriate decision will be taken.