



# Shree Steel Wire Ropes Limited

## Policy for determination of materiality of events and information for disclosure to the Stock Exchange(s)

### VERSION CONTROL

<b>Date of Amendment</b>	<b>Change Reference</b>	<b>Owner</b>	<b>Approving Authority</b>
May, 2021	Amendment of the policy under SEBI Regulation	Secretarial	Board of Directors



## 1. OBJECTIVE

The Policy is framed pursuant to requirements of the Regulation 30 of Securities and Exchange(s) Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The objective of the Policy is to determine materiality of events or information of the Company, to authorize one or more Key Managerial Personnel of the Company to disclose the material events or information to the Stock Exchange(s) and to ensure that such information is adequately disseminated in pursuance with the Regulations and to provide an overall governance framework for such determination of materiality.

### **Effective Date**

This amended Policy is approved by the Board of Directors of the Company at its Meeting.

## 2. DEFINITION

“**Act**” shall mean the Companies Act, 2013 and the Rules framed there under, including any modifications, clarifications, circulars or re-enactment thereof.

“**Board of Directors**” or “**Board**” means the Board of Directors of Shree Steel Wire Ropes Limited, as constituted from time to time.

“**Company**” means Shree Steel Wire Ropes Limited.

“**Key Managerial Personnel**” mean key managerial personnel as defined in sub-section (51) of section 2 of the Companies Act, 2013;

“**Listing Agreement**” shall mean an agreement that is to be entered into between recognised stock exchange(s) and the Company pursuant to Securities and Exchange Board (Listing Obligations and Disclosure Requirements) Regulations, 2015.



**“Material Event” or “Material Information”** shall mean such event or information as set out in the Schedule or as may be determined in terms of Point 3 of the Policy. In the Policy, the words, “material” and “materiality” shall be construed accordingly.

**“Material Subsidiary”** shall mean any subsidiary company of the Company which is or has been determined as a material subsidiary as per the provisions of the Regulations.

**“Policy”** means policy for determination of materiality of events and information for disclosure to the stock exchange(s) and as may be amended from time to time.

**“Regulations”** mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

**“Schedule”** means Schedule III of (Listing Obligations and Disclosure Requirements) Regulations, 2015.

**“Unpublished Price Sensitive Information”** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

- financial results;
- dividends;
- change in capital structure;
- mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- changes in key managerial personnel; and
- material events in accordance with the listing agreement.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Listing Agreement, SEBI Rules/Regulations or any other applicable law or regulation to the extent applicable to the Company.



### **3. GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION**

Events / information shall be considered as Material if it meets any of the following criteria:

- (a) the event or information is in any manner 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; and
- (d) any other event/information which is treated as being material in the opinion of the Board of Directors of the Company.

### **4. DISCLOSURES OF EVENTS OR INFORMATION**

- a) Events specified in Para A of Part A of Schedule III of the Listing Regulations are deemed to be material events and the Company shall make disclosure of such events or information as soon as reasonably possible and not later than twenty-four (24) hours from the occurrence of such event or information in the following manner:
  - i. inform the stock exchange(s) on which the securities of the Company is listed;
  - ii. upload on the website of the Company.

Provided that in case the disclosure is made after twenty-four (24) hours of occurrence of such event or information, the Company shall, along with such disclosure(s) provide an explanation for delay.

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



- c) The Company shall disclose all events or information with respect to its Material Subsidiaries.
- d) The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information and on its own initiative.

Further it shall confirm or deny any event or information to stock exchange(s) reported in the media, on query raised by stock exchange(s).

- e) In case where an event occurs or any information is available with the Company, but which may have material effect on the Company, the Company will make adequate disclosures in regard thereof.

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 archival of documents.

## **5. AMENDMENT**

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force. Any amendment(s) in Securities and Exchange Board (Listing Obligations and Disclosure Requirements), Regulations 2015, shall be deemed to have been incorporated in this policy with the date of the amendment made effective by the Securities and Exchange Board of India.

## **6. SCOPE AND LIMITATION**

In the event of any conflict between the provisions of this Policy and the Listing Agreement; Companies Act, 2013; Regulations or any other statutory enactments, rules, the provisions of such Listing Agreement / Companies Act, 2013 or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

## **7. DISSEMINATION OF POLICY**

This Policy shall be hosted on the website of the Company and address of such web link thereto shall be provided in the Annual Report of the Company.