



POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION FOR DISCLOSURE TO NATIONAL STOCK EXCHANGE

Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time ["Listing Regulations"] requires every Listed Company to disclose events or information which, in the opinion of the Board of Directors of a Company are material.

The Policy for determination of materiality of events and information for disclosure to Stock Exchange shall be as under:

1. Regulation 30 of the Listing Regulations mandates disclosure of all material events or information by the Company.
 - i) The events specified in Para A of Part A of Schedule III of the Listing Regulations are deemed to be material and shall be disclosed without applying any test of materiality.
 - ii) For the events specified in Para B of Part A of Schedule III of the Listing Regulations, the following criteria shall be considered for determining the materiality:
 - a) if its omission is likely to result in discontinuity or alteration of event or information already available publicly; or
 - b) if its omission is likely to result in significant market reaction if the said omission comes to light at a later date.

Where it is difficult to disclose the events or information based on the above criteria, the event or information may be considered material for disclosure if the potential impact exceeds 10% of the total revenue or net worth, whichever is lower, as per the last audited financial statements of the Company.

Further, the Company shall disclose any other event or information which, in the opinion of the Board of Directors, is material.

2. The Company shall disclose all events or information with respect to subsidiaries which are material for the Company, if any.



3. Shri Krishnakumar Srinivasan, Managing Director & CEO, and in his absence any one of Shri Pankaj Gupta, Company Secretary and Compliance Officer, Shri Naveen Agarwal, Alternate Company Secretary and Shri Prem Prakash Rathi, Chief Financial Officer are authorised to determine materiality of an event / information.
4. All the events/ information under this Policy shall be disclosed within such time and with such details as provided under the Listing Regulations or guidance issued by SEBI and/ or stock exchanges or any other authority from time to time.
5. Where the Company makes disclosures to the Stock Exchange under Sub-Para (i) or (ii) of Para 1 above, the Company will also disclose material development(s) on the said event / information.
6. Any one of Shri Krishnakumar Srinivasan, Managing Director & CEO, Shri Pankaj Gupta, Company Secretary and Compliance Officer, Shri Naveen Agarwal, Alternate Company Secretary and Shri Prem Prakash Rathi, Chief Financial Officer are authorized to make appropriate disclosures to the Stock Exchange.
7. In the event of any conflict between provisions of this Policy and/ or the Companies Act or Listing Regulations or any other statutory enactments or rules, the provisions of such Act or Listing Regulations or statutory enactments or rules shall prevail over this Policy.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, such amendment(s), clarification(s), circular(s) etc. shall prevail upon the relevant provisions of this Policy shall stand amended accordingly from the effective date of such amendment(s), clarification(s), circular(s) etc.

8. The Disclosure Policy will be posted on the Company's website www.shrirampistons.com and events & information disclosed to the Stock Exchange in terms of this Policy will also be posted on Company's website for atleast five years from the date such event / information is posted.