



Himadri Speciality Chemical Ltd

CIN: L27106WB1987PLC042756

POLICY ON DETERMINATION OF MATERIALITY OF EVENTS

[Pursuant to Regulation 30(4) (ii) of the SEBI (LODR) Regulations 2015]

Version	Revision Date	Approved By	Date Approved
Adopted on	01 December 2015	Board	09 November 2015
V1	17 December 2019	Board	17 December 2019
V2	10 February 2023	Board	10 February 2023
V3	18 July 2023	Board	18 July 2023

Policy on Determination of Materiality of Events

I. BACKGROUND AND APPLICABILITY

Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Regulation') requires every listed company to disclose events or information which, in the opinion of the Board of Directors or the designated Key Managerial Personnel (KMP), are material.

In this context, the Policy on Determination of Materiality of Events ("Policy") has been framed by the Board of Directors ("Board") of Himadri Chemicals & Industries Ltd ("HCIL"/ "Company") with the objective of determining materiality of events.

1. The Company shall disclose events as specified in Para A of Part A of Schedule III as specified in Regulation 30 are deemed to be material events;
2. The Company shall make disclosures of events as specified in Para B of Para A Schedule III based on application of guidelines for materiality as described 30(4);

II. CRITERIA FOR MATERIALITY

Materiality has to be determined on case to case basis depending on specific facts and circumstances relating to the information/event. For determination of materiality of information /events, the following criteria shall be considered by the Company:

- a. The omission of an event or information, which 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 the light at a later date; or
- c. The omission of an event or information, whose value or the expected impact in terms of value, exceed the lower of the following:
 - (1) Two percent of turnover, as per the last audited consolidated financial statement of the Company;
 - (2) Two percent of net worth, as per the last audited consolidated financial statement 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.
- d. In case where the criteria specified in points (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 of the Company or in the opinion of the designated KMP, the event or information is considered material.

III. DISCLOSURE

1. The Company shall first disclose to the Stock Exchange(s) all events or information which are material in terms of the provisions of the Regulation as soon as reasonably possible and in any case not later than the following:
 - (i) Thirty minutes from the closure of the meeting of the board of directors in which the decision pertaining to the event or information has been taken;
 - (ii) Twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the Company;
 - (iii) Twenty Four hours from the occurrence of the event or information, in case the event or information is not emanating from within the Company.
2. Disclosure with respect to events for which timelines have been specified in Part A of Schedule III shall be made within such timelines.
3. In case disclosure is made after the timelines specified under the Regulation, the Company shall, along with such disclosure provide the explanation for the delay.
4. Regular updates, if required, shall be made with relevant explanations.
5. All the disclosures would be hosted on the website of the Company for a minimum period of five years or as per the Policy on Preservation of Documents & Archival Policy of the Company.
6. The Company shall also disclose all such events or information with respect to subsidiaries which are material for the Company.
7. The Company shall confirm or deny any reported event or information to Stock Exchange(s).

IV. REVIEW

The Policy will be reviewed on an annual basis to assess the materiality of events. However, any subsequent modification in the Act or the rules framed thereunder or the Regulations and/ or any other laws in the regard shall automatically apply to this Policy. In any circumstance where the terms of this Policy are inconsistent with existing or newly enacted law, rule, regulation, or standard governing the Company, the said law, rule, regulation, or standard will take precedence over this Policy.

Dated: 18 July 2023

Anurag Choudhary
Chairman cum Managing
Director & CEO