



## **POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS**

### **I. PREAMBLE:**

Emmbi Industries Limited (hereinafter referred to as the “**Company**”) is committed to being open and transparent with all stakeholders and in disseminating information in a fair and timely manner.

Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred as “**Listing Regulations**”) requires every listed entity to frame a Policy for Determination of Materiality of Events and give suitable information to Stock Exchanges, based on the criteria specified in Regulation 30 of the Listing Regulations.

The Company has adopted the Policy on determination of materiality of events or information (the “**Policy**”) that warrants disclosure to investors and has been framed in compliance with the requirements of the Listing Regulations.

### **II. OBJECTIVES OF THE POLICY:**

The objectives of this Policy are as follows:

- a) To ensure that the Company complies with the disclosure obligations to which it is subject as a publicly-traded company as laid down by the Listing Regulations, various securities laws and any other legislations.
- b) To ensure that the information disclosed by the Company is timely and transparent.
- c) To ensure that corporate documents and public statements are accurate and do not contain any misrepresentation.
- d) To protect the confidentiality of material/ price sensitive information within the context of the Company’s disclosure obligations.
- e) To provide a framework that supports and fosters confidence in the quality and integrity of information released by the Company.
- f) To ensure uniformity in the Company’s approach to disclosures, raise awareness and reduce the risk of selective disclosures.

### **III. CRITERIA FOR DETERMINATION OF MATERIALITY OF EVENTS/INFORMATION:**

The following are the criteria/ guidelines for determination of materiality of events/ information:

- 1) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available in public domain; or

- 2) the omission of an event or information which is likely to result in significant market reaction if the said omission came to light at a later date; or
- 3) In case where the criteria specified in sub-clauses (1) and (2) above are not applicable, whenever an event/ information may be treated as being material in the opinion of the board of directors of Company, such event/information will be considered material.

IV. DISCLOSURE OF MATERIAL EVENTS/ INFORMATION:

The Managing Director and/or Executive Director & Chief Financial Officer and Company Secretary of the Company shall observe the following for proper and timely disclosure of any material events/ information:

- 1) The events/ information specified in Para A of Part A of Schedule III of Listing Regulations shall be deemed to be material events/ information and the same shall be disclosed without applying any test of materiality;
- 2) The events/ information specified in Para B of Part A of Schedule III shall be considered material if such events/ information qualifies the test of materiality specified in Clause-2 hereinabove and the same shall be disclosed if considered material;
- 3) Any events/ information which are not covered in point 1) and 2) above, but which is considered material, shall be disclosed by the Company at the appropriate stage.
- 4) All above disclosures shall be made within the statutory provisions applicable in respective case. The disclosure made to the Stock Exchange(s) under this Policy shall also be disclosed.

V. AMENDMENT:

The Board (including its duly constituted committees, wherever permissible), shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy.

VI. REVIEW:

This Policy shall be subject to review/changes as may be deemed necessary and in accordance with regulatory amendments from time to time.