

**DAI-ICHI KARKARIA LIMITED
POLICY FOR DETERMINATION OF MATERIAL EVENTS**

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Details of adoption and modifications of the Policy as approved by the Board of Directors:

Sr. No	Version	Effective date
1	Original Version	29.1.2016
2	Modified Version 1	11.8.2023

1. Introduction:

In terms of Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”) every Listed entity is required to frame a policy for determination of materiality of an event or information and accordingly is required to make disclosure of such event or information based on the policy.

In compliance with this requirement, the Board of Directors have framed the policy to disclose events or information which, in the opinion of the Board of Directors of Company are required to be disclosed. The said policy was adopted with the objective of determining materiality of events.

2. Definition

“**Board of Directors**” or “**the Board**” means the Board of Directors of Dai-ichi Karkaria Limited, as constituted from time to time.

“**Company**” means Dai-ichi Karkaria Limited.

“**Listing Regulations**” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

“**Material Events**” means events as specified in Schedule III to the Listing Regulations, as amended from time to time and upon the occurrence of which the Company shall make disclosures to stock exchange and host such disclosures on the Company’s website.

“**Policy**” means Policy for Determination of Material Events.

3. Determining Material Event:

a) The events specified in Para A of Part A of Schedule III of the Listing Regulations, as amended from time to time, are **deemed** to be material events and such events shall be disclosed without any application of guidelines for materiality as specified in Regulation 30(4) of the Listing Regulations.

b) The events specified in Para B of Part A of Schedule III of the Listing Regulations, shall be disclosed upon application of guidelines for materiality as specified in Regulation 30(4) of the Listing Regulations. Such events are mentioned below:

- i. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
- ii. Any of the following events:
 - (a) arrangements for strategic, technical, manufacturing, or marketing tie-up; or
 - (b) adoption of new line(s) of business; or
 - (c) closure of operation of any unit, division or subsidiary (in entirety or in piecemeal)
- iii. Capacity addition or product launch.
- iv. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.

- v. Agreements (viz. loan agreement(s) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
 - vi. Disruption of operations of any one or more units or division of the Company due to natural calamity (earthquake, flood, fire, etc.), force majeure or events such as strikes, lockouts, etc.
 - vii. Effect(s) arising out of change in the regulatory framework applicable to the Company.
 - viii. Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the Company.
 - ix. Frauds or defaults by employees of the Company which has or may have an impact on the Company.
 - x. Options to purchase securities including any ESOP/ESPS Scheme.
 - xi. Giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party.
 - xii. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
 - xiii. Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority.
- c) Any other events or information viz. major development which is likely to affect the business of the Company and such information or events 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 information in such securities shall be disclosed.
- d) Apart from the events mentioned in a, b & c above, the Company may make disclosures of event or information as specified by the Board from time to time.
- e) In case an event or information required to be disclosed by the Company in terms of the provisions of Listing regulation, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.
- f) Following certain types of agreements binding the Company also needs to be disclosed;
- i) All the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel and employees of a Company or of its holding, subsidiary and associate company, who are parties to the agreements specified in clause 5A of para A of part A of Schedule III of Listing regulations, shall inform the Company about the agreement to which such a Company is not a party, within two working days of entering into such agreements or signing an agreement to enter into such agreements:
 - ii) The Company shall disclose the number of agreements that subsist as on the date of notification of clause 5A to para A of part A of schedule III to Listing regulations, their salient features, including the link to the webpage where the complete details of such agreements are available, in the Annual Report of the Company.

4. Criteria for determining materiality of events/ information:

Regulation 30(4)(i) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 determines criteria for materiality of events/ information, which are as under:

- i) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
- ii) 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
- iii) 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;
- iv) In case where the criteria specified above in sub-clauses (i), (ii) and (iii) are not applicable, an event or information may be treated as being material if in the opinion of the board of directors of Company, the event or information is considered material.

5. Timelines for making the disclosures: The Company shall first disclose to the stock exchange all events or information which are material in terms of the provisions of Listing Regulations or stated in this policy, 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 of the event or information is not emanating from within the Company.

The disclosure with respect to events or information for which timelines have been specified in Part A of Schedule III of Listing Regulations shall be made within such timelines. In case the Company fails to make the disclosure within the specified time period, the Company shall alongwith such disclosure, provide an explanation for such delay. All disclosures made under this policy shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company.

6. Authorization for disclosure:

The Board of Directors of the Company have severally authorized following Key Managerial Personnel for the purpose of determining materiality of events or information & for the purpose of making disclosure to the Stock Exchange;

- i) Chairperson & Whole-time Director; or
- ii) Managing Director; or
- iii) Chief Financial Officer; or
- iv) Company Secretary

The name, designation and contact details of the above Key Managerial Personnel has been disclosed to the Stock Exchange.

The relevant employees of the Company on identifying any potential material event or information shall report the same to the authorized Key Managerial Personnel for determining the materiality of the said event or information and for making the necessary disclosures to the stock exchange.

7. Disclosure: The Policy will be disclosed on the website of the Company viz. www.dai-ichiindia.com

8. Amendments to the Policy: In case of any subsequent amendments to the Listing Regulations which make any of the provisions in the Policy inconsistent, the provisions of the Listing Regulations shall prevail. Any amendment in this policy shall be promptly disclosed on the Company's website pursuant to applicable laws and regulations, together with details about the nature of the amendments.