



SHREE RENUKA SUGARS LIMITED

POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

1. Preamble:

As per Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “SEBI Listing Regulations”), the Company is required to frame a policy for determination of materiality for disclosure of events or information to Stock Exchanges, based on the criteria specified in Regulation 30 of the said Regulations and the same is also required to be disclosed on the Company’s website.

2. Purpose:

The purpose of this Policy is to determine “materiality” of events and information, and to ensure that the Listed entity shall make disclosure of events / transaction/ information in terms of Regulation 30 of Listing Regulations [specified in paras A and B of Part A of Schedule III of the SEBI Listing Regulations (as amended from time to time) to the Stock Exchanges.

3. Criteria for Determining Materiality:

Besides the events mentioned in Para A of Part A of Schedule III of SEBI Listing Regulations, 2015, an event /information would be deemed as Material, if –

- (a) The event is likely to have an impact of the following:
 - 10% or more of the total income as per the last Financial Statements of the Company, or
 - 10% or more of the net profit/loss, as per the last Financial Statements of the Company
- (b) the omission of an event or information, 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;
- (d) where the criteria specified in sub-clauses (a), (b) and (c) are not applicable, an event/information may be treated as being material, if in the opinion of the Executive Directors or the Chief Financial Officer of the Company, the event / information is considered material.

4. Material Events and Information

- 4.1 The events specified in Para A of Part A of Schedule III to the SEBI Listing Regulations shall be deemed to be material events for the purpose of disclosure to the Stock Exchanges, without application of materiality criterion/ thresholds given in clause 3 above.
- 4.2 The following events and information specified in Para B of Part A of Schedule III to the SEBI Listing Regulations, after application/conforming to the criteria given in clause 3, shall be considered material for the purpose of disclosure to the Stock Exchanges in terms of Regulation 30(3) of the Listing Regulations:
1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
 2. Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division (entirety or piecemeal).
 3. Capacity addition or product launch.
 4. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
 5. Agreements (viz. loan agreement(s) (as a borrower) 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.
 6. Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
 7. Effect(s) arising out of change in the regulatory framework applicable to the listed entity
 8. Litigation(s) / dispute(s) / regulatory action(s) with impact.
 9. Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.
 10. Options to purchase securities including any ESOP/ESPS Scheme.
 11. Giving of guarantees or indemnity or becoming a surety for any third party.
 12. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
- 4.3 Without prejudice to the generality of the foregoing, the Company shall also disclose any other event or information to the Stock Exchanges which is considered material by the Executive Directors or Chief Financial Officer of the Company in accordance with Clause 3 above.
- 4.4 The aforesaid events and information shall be disclosed to the Stock Exchanges in the manner prescribed under the SEBI Listing Regulations.



5. Authorization for Determination of Materiality of events other deemed material events:

- 5.1 The Executive Directors and Chief Financial Officer of the Company shall decide the “materiality” of any event / transaction / information based on the guidelines mentioned in Clause 3 above for the purpose of disclosure to the Stock Exchanges and intimate the Company Secretary to disclose the information.
- 5.2 Upon receipt of the intimation, the Company Secretary or the Chief Financial Officer to disclose the said information to the Stock Exchange(s) under Regulation 30 of Listing Regulations. However, such disclosures can also be made either by the Chairperson, the Managing Director, or the Whole time Directors of the Company.

6. Amendment

This Policy can be amended, modified or revised by the Board of Directors of the Company from time to time. In case any provisions of this Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed there under or the SEBI Listing Regulations (“Statutory Provisions”), the Statutory Provisions shall prevail.

Place : Mumbai
Date : 9th August, 2022

Atul Chaturvedi
Executive Chairman