

## MANUGRAPH INDIA LIMITED

### POLICY ON DETERMINATION OF MATERIALITY OF EVENTS/INFORMATION

#### 1. Preamble

As per Regulation 30(4)(ii) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company shall frame a policy for determination of materiality, based on criteria specified in this sub-regulation, duly approved by its Board of Directors, which shall be disclosed on its website.

#### 2. Object of the Policy

This policy is framed to ensure compliance with the above Listing Regulation. This policy lays down the criteria for determination of materiality of events/information required to be disclosed on its website.

#### 3. Criteria for determination of materiality of events/information:

The guideline for determination of materiality of events/ information:

- 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 light at a later date;
- c) In case where the criteria specified in sub-clauses (a) and (b), above are not applicable, an event/information may be treated as being material if in the opinion of the Board of Directors of the Company, the event / information is considered material.

#### 4. Events deemed to be material events

Events specified in Para A of Part A of Schedule III are deemed to be material events and the Company shall make disclosure of such events without any application of the guidelines for materiality as specified in sub-regulation (4) of regulation (30).

## **5. Authorization to determine materiality of an event or information**

As per requirements of regulation 30(5) of the Listing Regulations, the Board of Directors shall authorise one or more Key Managerial Personnel (KMPs) for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) under this regulation and the contact details of such personnel shall be also disclosed to the stock exchange(s) and as well as on the website of the Company. Accordingly, the Board of Directors of the Company has authorized the following executives severally for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) under this regulation.

- i) Mr. Sanjay S. Shah, Vice Chairman and Managing Director
- ii) Mr. Pradeep S. Shah, Managing Director
- iii) Mr. Suresh Narayan, Chief Financial Officer
- iv) Mr. Mihir Mehta, Company Secretary

## **6. Contact details**

Manugraph India Limited

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## **7. Modifications in the policy**

Mr. Sanjay Shah, Vice Chairman & Managing Director and Mr. Pradeep Shah, Managing Director are severally authorized to make any change or modification in this policy as may be necessitated due to the change in Listing Regulations or in the Companies Act, 2013 and the rules thereunder, or any other Act/Regulations/Rules at any point of time. Any change / amendment to this Policy shall be tabled before the Board for information.