



POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

(Pursuant to Regulation 30 of SEBI (LODR) Regulations, 2015)

Effective Date: December 1, 2015

Lastly modified on: July 29, 2025

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION

1. Preface

This Policy has been formulated by the Board of Directors of Triveni Engineering & Industries Limited ('the Company') in accordance with the guidelines laid down by Securities and Exchange Board of India ("SEBI") under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**SEBI LODR Regulations**"), as amended, read with Circular(s) and Industry Standards Note issued from time to time by SEBI or any other forum in consultation with SEBI, for determining the materiality thresholds with respect to certain events or information of the Company and disclosure thereof to the stock exchanges.

2. Objective

The objective of this Policy is to identify any material events or information, as specified in this Policy, and to make necessary disclosure to the Stock Exchanges in terms of Regulation 30 read with Schedule-III of the SEBI LODR Regulations and relevant circular(s) and Industry Standards Note issued from time to time in a timely and appropriate manner.

3. Definitions

In this Policy, unless the context otherwise requires:

- (a) "**Act**" means the Companies Act, 2013 and the rules framed thereunder, as amended from time to time.
- (b) "**Board of Directors**" or "**Board**") means the Board of Directors of the Company.
- (c) "**Company**" means **Triveni Engineering & Industries Limited**
- (d) "**Key Managerial Personnel**" means key managerial personnel as defined under sub-section (51) of section 2 of the Companies Act, 2013.
- (e) "**SEBI LODR Regulations**" means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.
- (f) "**Net Worth**" shall have the meaning assigned to it in Section 2(57) of the Act;
- (g) "**Policy**" means this policy, as amended from time to time.
- (h) "**SEBI**" means the Securities and Exchange Board of India.
- (i) "**Rules**" means the rules made under the Act.
- (j) "**Stock Exchange(s)**" means BSE Limited and the National Stock Exchange of India Limited, where the equity shares of the Company are listed.
- (k) "**Turnover**" shall have the meaning assigned to it in Section 2(91) of the Act;

All other words and expressions used but not defined in this Policy, shall have the same meaning as assigned to it under the SEBI LODR Regulations, Circular(s), Industry Standards Note, the Act, the SEBI Act, 1992 (“**SEBI Act**”) and the Securities Contracts (Regulation) Act, 1956 (“**SCRA**”).

4. **Disclosure of Events or Information**

(a) Deemed Material Events

The Company shall disclose all such events which are specified in Para A of Part A of Schedule III of the SEBI LODR Regulations (as applicable from time to time) without any application of the guidelines for materiality, as specified in sub-regulation (4) of Regulation 30 of the SEBI LODR Regulations. Such events are enlisted in **Annexure I** of this Policy.

(b) Events dependent on applicability of guidelines for materiality

The Company shall disclose all such material events or information which are specified in Para B of Part A of Schedule III of the SEBI LODR Regulations, based on application of guidelines for materiality, as specified in sub-regulation (4) of Regulation 30 of the SEBI LODR Regulations read with applicable SEBI Circulars and Industry Standards Note on Regulation 30 of the SEBI LODR Regulations, as may be issued/ amended from time to time. Such events are enlisted in **Annexure II** of this Policy.

5. **Guidelines for determining materiality of events or information**

- (i) The Company shall consider the following criteria for determination of materiality of events/ information:

Qualitative criteria would mean an event/ 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

Quantitative Criteria would mean the omission of an event or information, whose value or the expected impact in terms of value, exceeds lower of the following:

- (a) 2% (two per cent) of consolidated turnover, as per the last audited consolidated financial statements of the Company;
- (b) 2% (two per cent) of consolidated 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;
- (c) 5% (five percent) of average of absolute value of consolidated profit or loss after tax, as per the last three audited consolidated financial statements of the Company.

- (ii) Further, materiality will be determined on a case to case basis depending on specific facts and circumstances relating to such event/information.
- (iii) In case where the qualitative and quantitative criteria as mentioned above are not applicable, any other event/information may be treated as being material if in the opinion of the Board of Directors of Company, the event / information is considered material.

6. Mandatory Requirements- Timelines for disclosure of material events or information

- (a) All events/information identified as material in line with the SEBI LODR Regulations and under this Policy shall be disclosed 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 in which the decision pertaining to the event or information has been taken*; however, in case the meeting of the Board of Directors closes after normal trading hours of that day but more than three hours before the beginning of the normal trading hours of the next trading day, a disclosure of the decision pertaining to the event or information, shall be made within three hours from the closure of the board meeting.

Further, in case the meeting of the board of directors is being held for more than one day, the financial results shall be disclosed within thirty minutes or three hours, as applicable, from closure of such meeting for the day on which it has been considered;
 - ii. twelve hours from the *occurrence of the event or information*, in case the event or information *is emanating from within the Company*; and
 - 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*.
- (b) The Company shall disclosure all material events or information within the timelines specified in the SEBI LODR Regulations read with circulars and industry standards note issued/amended from time to time.
- (c) In case the disclosure is made after the stipulated timeline, the Company shall provide an explanation for the delay along with the disclosure.
- (d) The Company shall disclose all further material developments with respect to the disclosures referred to in this Policy on a regular basis, till the event is resolved / closed, with relevant explanations.

However, for every event / information listed in Para B - Part A of Schedule III of the SEBI LODR Regulations, additionally the Company shall make reference to the Industry Standards Note ([ISF Note Reg30](#)) or any other circular(s), FAQ(s) issued by SEBI or Stock Exchanges from time to time.

7. Guidelines on occurrence of an event/information & its timely disclosure

- (i) The occurrence of material events/information –
 - (a) depends upon the stage of discussion, negotiation or approval; and
 - (b) in case of natural calamities disrupting operations etc., it would depend upon the timing when the company became aware of the event/information.
- (ii) In respect of the events under 7(i)(a), the events/information can be said to have occurred upon receipt of approval of the Board of Directors, e.g. further issue of capital by rights issuance and in certain events/information after receipt of approval of both i.e. Board of Directors and Shareholders.

However, considering the price sensitivity involved, for certain events e.g. decision on declaration of dividends etc., disclosure shall be made on receipt of approval of the event by the Board of Directors, pending Shareholder's approval. Approvals other than final approvals, such as in-principle approvals, exploratory approvals etc. will not require disclosure under this Policy.

- (iii) In respect of the events under 7(i)(b), the events/information can be said to have occurred when the Company becomes aware of the events/information, or as soon as, an officer of the entity has, or ought to have reasonably come into possession of the information in the course of the performance of his duties.

The term 'officer' shall have the same meaning as defined under the Act and shall also include Promoter of the Company.

Notwithstanding the above, the Company shall confirm, deny or clarify any reported event or information in the mainstream media in terms of Regulation 30 of the SEBI LODR Regulations

8. Authorization for determining materiality of events or information and for making disclosures to the stock exchanges

A Committee comprising of the following KMPs of the Company is hereby authorized for the purpose of determining materiality of an event or information, evaluating whether an event/ information requires Stock Exchange disclosures, and for the purpose of making disclosures to the Stock Exchanges within the applicable timelines ("**Authorized Committee**"):

1. Managing Director(s)
2. Chief Financial Officer
3. Company Secretary and Compliance Officer

- (i) Unless otherwise decided by the Board, the Authorized Person(s) shall be jointly or severally authorized to determine materiality of an event or information for the purpose of making disclosure to the Stock Exchanges.

- (ii) The Authorized Person(s) shall determine materiality as per the SEBI Listing Regulations and review whether a particular event or information would have any material impact or not, in consultation with the Managing Director(s), and accordingly disclose the same under Regulation 30 of the SEBI LODR Regulations.
- (iii) The Authorized Person(s) will be guided by the circulars issued by SEBI from time to time, while expressing a view on whether an event/ information has occurred requiring a disclosure to be made under this Policy and the contents of such disclosure.
- (iv) The Authorized Person(s) shall take into consideration totality of factors surrounding the particular information to take a view on whether the information is market sensitive information, particularly for the events/information, where the quantitative criteria cannot be ascertained or applied.
- (v) The Authorized Person(s) may seek expert advice where so felt necessary as to whether the information is required to be disclosed in accordance with the terms of this Policy.
- (vi) The heads of various businesses and units of the Company including functional heads will support the Authorized Person(s) with regard to compliance of the terms of this Policy, and forthwith notify the Authorized Person(s) and provide all relevant details with regard to any event/ information which is likely to be construed as material under this Policy.
- (vii) The contact details of the Authorized Person(s) shall be disclosed to the Stock Exchange(s) and also be placed on the Company's website.
- (viii) The Company Secretary shall in co-ordination with the Committee shall disseminate/disclose the information to the Stock Exchanges where the securities of the Company are listed.

9. Amendments

The Board of Directors may, subject to any applicable laws, amend any provision or substitute any of the provision with the new provision or replace the Policy entirely with a new Policy at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law including SEBI LODR Regulations for the time being in force.

In the event of any conflict between the provisions of this Policy and the SEBI LODR Regulations or any other statutory enactments, rules, etc., the provisions of such SEBI LODR Regulations or statutory enactments shall prevail over this Policy.

10. Dissemination of Policy

This policy shall be made available on the website of the Company.

Annexure I

Para / sub-para	Events	Timeline for Disclosure
A.	Events which shall be disclosed without any application of the guidelines for materiality as specified in sub-regulation (4) of regulation (30):	
1.	<p>Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation/ merger/ demerger/restructuring), sale or disposal of any unit(s), division(s), whole or substantially the whole of the undertaking(s) or subsidiary of the company, sale of stake in the associate company of the company or any other restructuring.</p> <p>Explanation.- For the purpose of this sub-para, the word 'acquisition' shall mean,- (i) acquiring control, whether directly or indirectly; or, (ii) acquiring or agreeing to acquire shares or voting rights in, a company, whether existing or to be incorporated, whether directly or indirectly, such that - (a) the Company holds shares or voting rights aggregating to twenty per cent or more of the shares or voting rights in the said company, or; (b) there has been a change in holding from the last disclosure made under sub- clause (a) of clause (ii) of the Explanation to this sub-para and such change exceeds five per cent of the total shareholding or voting rights in the said company, or; (c) the cost of acquisition or the price at which the shares are acquired exceeds the threshold specified in sub clause (a) of clause (5) given below.</p> <p>Explanation: A. For the purpose of this sub-paragraph, “sale or disposal of subsidiary” and “sale of stake in associate company” shall include- (i). an agreement to sell or sale of shares or voting rights in a company such that the company ceases to be a wholly owned subsidiary, a subsidiary or an associate company of the Company; or (ii). an agreement to sell or sale of shares or voting rights in a subsidiary or associate company such that the amount of the sale exceeds the threshold specified in sub clause (a) of clause (5) given below.</p> <p>Explanation B. For the purpose of this sub-paragraph, “undertaking” and “substantially the whole of the undertaking” shall have the same meaning as given under section 180 of the Companies Act, 2013.</p>	<p>Within 12 hours *</p> <p>However, acquisition of shares or voting rights by listed entity (the Company) in an unlisted company, aggregating to 5% or any subsequent change in the holding exceeding 2%, - To be disclosed within 30 days from the end of each quarter as part of Integrated Filing (Governance).</p>

2.	Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.	Within 12 hours*
3.	New Ratings(s) or Revision in Rating(s).	Within 24 hours*
4.	<p>Outcome of Meetings of the board of directors of the Company in relation to the following matters:</p> <p>a) dividends recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched;</p> <p>b) any cancellation of dividend with reasons thereof;</p> <p>c) the decision on buyback of securities;</p> <p>d) the decision with respect to fund raising proposed to be undertaken including by way of issue of securities (excluding security receipts, securitized debt instruments or money market instruments regulated by the Reserve Bank of India), through further public offer, rights issue, American Depository Receipts/ Global Depository Receipts/ Foreign Currency Convertible Bonds, qualified institutions placement, debt issue, preferential issue or any other method;</p> <p>e) increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched;</p> <p>f) reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to;</p> <p>g) short particulars of any other alterations of capital, including calls;</p> <p>h) financial results;</p> <p>i) decision on voluntary delisting from stock exchange(s).</p>	<p>-within thirty minutes of closure of board meeting, in which the decision pertaining to the event or information has been taken;</p> <p>-within three hours of closure of board meeting, if board meeting closes after normal trading hours of that day but more than three hours before the beginning of the normal trading hours of the next trading day</p>
5.	Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the company), agreement(s)/ treaty (ies)/contract(s) with media companies) which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.	<p>Within 12 hours* (for agreements where Company is a party);</p> <p>Within 24 hours* (for agreements where Company is not a party)</p>

5A.	<p>Agreements entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the company or of its holding, subsidiary or associate company, among themselves or with the company or with a third party, solely or jointly, which, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or impose any restriction or create any liability upon the listed entity, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the listed entity is a party to such agreements:</p> <p>Provided that such agreements entered into by a listed entity in the normal course of business shall not be required to be disclosed unless they, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or they are required to be disclosed in terms of any other provisions of these regulations.</p> <p>Explanation: For the purpose of this clause, the term “directly or indirectly” includes agreements creating obligation on the parties to such agreements to ensure that listed entity shall or shall not act in a particular Manner.</p>	<p>Within 12 hours* (for agreements where Company is a party);</p> <p>Within 24 hours* (for agreements where Company is not a party)</p>
6.	<p>Fraud or defaults by Company, its promoter, director, key managerial personnel, senior management or subsidiary or arrest of key managerial personnel, senior management, promoter or director whether occurred within India or abroad.</p> <p>For the purpose of this sub-paragraph:</p> <p>(i). ‘Fraud’ shall include fraud as defined under Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.</p> <p>(ii). ‘Default’ shall mean non-payment of the interest or principal amount in full on the date when the debt has become due and payable.</p> <p>Explanation 1- In case of revolving facilities like cash credit, the Company would be considered to be in ‘default’ if the outstanding balance remains continuously in excess of the sanctioned limit or drawing power, whichever is lower, for more than thirty days.</p> <p>Explanation 2- Default by a promoter, director, key managerial personnel, senior management, subsidiary shall mean default which has or may have an impact on the Company.</p> <p>Explanation 3- Fraud by senior management, other than who is promoter, director or key managerial personnel, shall be required to be disclosed only if it is in relation to the company.</p>	Within 24 hours

7.	Change in directors, key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.), senior management, Auditor and Compliance Officer.	Within 12 hours* (except in case of resignation) Within 24 hours* (in case of resignation)
7A.	In case of resignation of the auditor of the company, detailed reasons for resignation of auditor, as given by the said auditor.	As soon as possible but not later than twenty four hours of receipt of such reasons from the auditor
7B.	Resignation of independent director including reasons for resignation. The following disclosures shall be made to the stock exchanges: i. The letter of resignation along with detailed reasons for the resignation as given by the said director. ii. Names of listed entities in which the resigning director holds directorships, indicating the category of directorship and membership of board committees, if any. iii. The independent director shall, along with the detailed reasons, also provide a confirmation that there is no other material reasons other than those provided. iv. The confirmation as provided by the independent director above shall also be disclosed by the company to the stock exchanges along with the disclosures as specified in (i) and (ii) above.	Within 7 days from the date of resignation, along with resignation letter
7C.	Letter of resignation along with detailed reasons for the resignation as given by the key managerial personnel, senior management, Compliance Officer or director.	Within 7 days from the date of such resignation comes into effect, along with resignation Letter
7D.	In case the Managing Director or Chief Executive Officer of the company was indisposed or unavailable to fulfil the requirements of the role in a regular manner for more than forty five days in any rolling period of ninety days, the same along with the reasons for such indisposition or unavailability, shall be disclosed to the stock exchange(s).	Within 12 hours *
8.	Appointment or discontinuation of share transfer agent	Within 12 hours *
9.	Resolution plan/ Restructuring in relation to loans/borrowings from banks/financial institutions including the following details: i. Decision to initiate resolution of loans/borrowings; ii. Signing of Inter-Creditors Agreement (ICA) by lenders; iii. Finalization of Resolution Plan; iv. Implementation of Resolution Plan; v. Salient features, not involving commercial secrets, of the resolution/ restructuring plan as decided by lenders.	Within 24 hours
10.	One time settlement with a bank.	Within 24 hours

11.	Winding-up petition filed by any party / creditors	Within 24 hours
12.	Issuance of notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the listed entity.	Within 12 hours *
13	Proceedings of annual and extraordinary general meetings of the company.	Within 12 hours *
14	Amendments to memorandum and articles of association of company, in brief.	Within 12 hours *
15	<p>(a) Schedule of analysts or institutional investors meet by the company to analysts or institutional investors.</p> <p>Presentations prepared by the Company for analysts or institutional investors meet, post earnings or quarterly calls.</p> <p>Explanation: For the purpose of this clause 'meet' shall mean group meetings or group conference calls conducted physically or through digital means.</p> <p>(b) Audio or video recordings and transcripts of post earnings/quarterly calls, by whatever name called, conducted physically or through digital means, simultaneously with submission to the recognized stock exchange(s), in the following manner:</p> <p>(i) the Audio recordings shall be promptly made available on the website and in any case;</p> <p>(ii) Video recordings, if any, shall be made available on the website;</p> <p>(iii) Transcripts of such calls shall be made available on the website along with simultaneous submission to recognized stock exchanges</p>	<p>-at least two working days in advance (excluding the date of the intimation and the date of the meet)</p> <p>-prior to beginning of such events</p> <p>-before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier</p> <p>- within forty-eight hours from the conclusion of such calls</p> <p>-within five working days of conclusion of such calls</p>
16	<p>The following events in relation to the corporate insolvency resolution process (CIRP) of a listed corporate debtor under the Insolvency Code:</p> <p>a) Filing of application by the corporate applicant for initiation of CIRP, also specifying the amount of default;</p> <p>b) Filing of application by financial creditors for initiation of CIRP against the corporate debtor, also specifying the amount of default;</p> <p>c) Admission of application by the Tribunal, along with amount of default or rejection or withdrawal, as applicable;</p>	Within 24 hours

	<p>d) Public announcement made pursuant to order passed by the Tribunal under section 13 of Insolvency Code;</p> <p>e) List of creditors as required to be displayed by the corporate debtor under regulation 13(2)(c) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;</p> <p>f) Appointment/ Replacement of the Resolution Professional;</p> <p>g) Prior or post-facto intimation of the meetings of Committee of Creditors;</p> <p>h) Brief particulars of invitation of resolution plans under section 25(2)(h) of Insolvency Code in the Form specified under regulation 36A(5) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;</p> <p>i) Number of resolution plans received by Resolution Professional;</p> <p>j) Filing of resolution plan with the Tribunal;</p> <p>k) Approval of resolution plan by the Tribunal or rejection, if applicable;</p> <p>l) Specific features and details of the resolution plan as approved by the Adjudicating Authority under the Insolvency Code, not involving commercial secrets, including details such as:</p> <p>(i) Pre and Post net-worth of the company;</p> <p>(ii) Details of assets of the company post CIRP;</p> <p>(iii) Details of securities continuing to be imposed on the companies' assets;</p> <p>(iv) Other material liabilities imposed on the company;</p> <p>(v) Detailed pre and post shareholding pattern assuming 100% conversion of convertible securities;</p> <p>(vi) Details of funds infused in the company, creditors paid-off;</p> <p>(vii) Additional liability on the incoming investors due to the transaction, source of such funding etc.;</p> <p>(viii) Impact on the investor – revised P/E, RONW ratios etc.;</p> <p>(ix) Names of the new promoters, key managerial persons(s), if any and their past experience in the business or employment. In case where promoters are companies, history of such company and names of natural persons in control;</p> <p>(x) Brief description of business strategy.</p> <p>m) Any other material information not involving commercial secrets.</p> <p>n) Proposed steps to be taken by the incoming investor/acquirer for achieving the MPS;</p> <p>o) Quarterly disclosure of the status of achieving the MPS;</p> <p>p) The details as to the delisting plans, if any approved in the resolution plan.</p>	
17	Initiation of Forensic audit: In case of initiation of forensic audit, (by whatever name called), the following disclosures shall be made to the stock exchanges by company:	Within 12 hours * (if initiated by the company);

	<p>(a) The fact of initiation of forensic audit along-with name of entity initiating the audit and reasons for the same, if available;</p> <p>(b) Final forensic audit report (other than for forensic audit initiated by regulatory / enforcement agencies) on receipt by the company along with comments of the management, if any.</p> <p>Explanation- For the purpose of this sub-paragraph, forensic audit refers to the audits, by whatever name called, which are initiated with the objective of detecting any mis-statement in financial statements, mis- appropriation, siphoning or diversion of funds and does not include audit of matters such as product quality control practices, manufacturing practices, recruitment practices, supply chain process including procurement or other similar matters that would not require any revision to the financial statements disclosed by the listed entity.</p>	Within 24 hours (if initiated by external agency).
18	<p>Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel or senior management of a company, in relation to any event or information which is material for the listed entity in terms of regulation 30 of these regulations and is not already made available in the public domain by the company.</p> <p>Explanation – “social media intermediaries” shall have the same meaning as defined under the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.</p>	Within 24 hours
19	<p>Action(s) initiated or orders passed by any regulatory, statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the company, in respect of the following:</p> <p>(a) search or seizure; or</p> <p>(b) re-opening of accounts under section 130 of the Companies Act, 2013; or</p> <p>(c) investigation under the provisions of Chapter XIV of the Companies Act, 2013;</p> <p>along with the following details pertaining to the actions(s) initiated, taken or orders passed:</p> <ol style="list-style-type: none"> name of the authority; nature and details of the action(s) taken, initiated or order(s) passed; date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority; details of the violation(s)/contravention(s) committed or alleged to be committed; impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible. 	Within 24 hours

Annexure II

Para / sub-para	Events	Timeline for Disclosure	Comparable with individual threshold limit (Numerator to Denominator)
B	Events which shall be disclosed upon application of the guidelines for materiality referred sub-regulation (4) of regulation (30)		
1	Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division	Within 12 hours *	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/loss to 5% of average PAT
2	Any of the following events pertaining to the company:	Within 12 hours *	
	(j) arrangements for strategic, technical, manufacturing, or marketing tie-up;	Within 12 hours *	Lower of the below: a. Capital invested or to be invested for such tie-up to 2% of consolidated net worth; or b. Expected impact on turnover to 2% of consolidated turnover; or c. Expected impact on profit/loss to 5% of average PAT
	(ii) adoption of new line(s) of business;	Within 12 hours *	Lower of the below: a. Capital invested or to be invested for such tie-up to 2% of consolidated net worth; or b. Expected impact on turnover to 2% of consolidated turnover; or c. Expected impact on profit/loss to 5% of average PAT
	(iii) closure of operation of any unit, division, or subsidiary (entirety or piecemeal)	Within 12 hours *	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/loss to 5% of average PAT

3	Capacity addition or product launch.	Within 12 hours *	<p>Capacity addition:</p> <p>Lower of the below:</p> <p>a. Capital invested or to be invested to 2% of consolidated net worth; or</p> <p>b. Expected impact on turnover to 2% of consolidated turnover; or</p> <p>c. Expected impact on profit/loss to 5% of average PAT</p> <p>Product launch:</p> <p>Lower of the below:</p> <p>a. Capital invested or to be invested for product launch to 2% of consolidated net worth; or</p> <p>b. Expected impact on turnover to 2% of consolidated turnover; or</p> <p>c. Expected impact on profit/loss to 5% of average PAT</p>
4	Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.	Within 24 hours	<p>Lower of the below:</p> <p>a. Expected capital expenditure to 2% of consolidated net worth; or</p> <p>b. Expected impact on turnover to 2% of consolidated turnover; or</p> <p>c. Expected impact on profit/loss to 5% of average PAT</p>
5	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.	<p>Within 12 hours* (for agreements where Company is a party)</p> <p>Within 24 hours (for agreements where Company is not a party)</p>	<p>Lower of the below, as may be applicable:</p> <p>a. Expected impact on balance sheet (increase in liability in terms of amount of loan) to 2% of consolidated net worth; or</p> <p>b. Expected impact on turnover to 2% of consolidated turnover; or</p> <p>c. Expected impact on profit/loss to 5% of average PAT</p>

6	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.	Within 24 hours	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/loss to 5% of average PAT
7	Effect(s) arising out of change in the regulatory framework applicable to the company	Within 24 hours	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/loss to 5% of average PAT
8	(a). Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the company. (b) Updates on ongoing tax litigations or disputes	Within 24 hours Within 30 days from end of each quarter as part of Integrated Filing (Governance).	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/loss to 5% of average PAT
9	Frauds or defaults by employees of the listed entity which has or may have an impact on the company.	Within 24 hours	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/loss to 5% of average PAT
10	Options to purchase securities including any ESOP/ESPS Scheme	Within 12 hours *	Lower of the below: a. Expected increase in capital to 2% of consolidated net worth; or b. Expected impact on profit/loss to 5% of average PAT

11	Giving of guarantees or indemnity or becoming a surety, by whatever name called, for any third party.	Within 12 hours *	Lower of the below: a. Expected impact on balance sheet (increase in liability in terms of amount of guarantee, indemnity, surety, etc.) to 2% of consolidated net worth; or b. Expected impact on profit/loss in case the guarantee / indemnity / surety is invoked to 5% of average PAT
12	Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals	Within 24 hours	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/loss to 5% of average PAT
13	Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority.	Within 12 hours *	Threshold to be linked with Para 20 of Annexure I hereto - imposition of penalty
C.	Any other information/event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the listed entity which may be necessary to enable the holders of securities of the listed entity to appraise its position and to avoid the establishment of a false market in such securities	Within 24 hours	
D.	Without prejudice to the generality of para (A), (B) and (C) above, the Company may make disclosures of event/ information as specified by the SEBI from time to time.	Timeline as specified by the SEBI.	

Notes:

- In case the event or information emanates from a decision taken in a meeting of board of directors, the same shall be disclosed within 30 minutes or 3 hours, as applicable as per Regulation 30(6), from the closure of such meeting as against the timeline indicated in the table above.

- The above comparison of numerator to denominator for each event shall be applied basis on the assessment available with the Company, whether internal or external including any press release, transaction documents, insurance, board presentation, management review, etc., for determining such expected impact on turnover, capital expenditure, profits, etc.
- Consolidated turnover, net worth and profit/loss shall be as per the last audited consolidated financial statements of the listed entity and the average PAT shall be average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the listed entity.
