



ANJANI PORTLAND CEMENT LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS AND INFORMATION FOR DISCLOSURE

PREAMBLE

In terms of Regulation 30(1) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time (“SEBI Listing Regulations”), every listed entity shall make disclosure of any events or information which, in opinion of the Board of Directors of the listed company, are material.

Regulation 30(4)(ii) of SEBI Listing Regulation requires framing of a policy for determination of materiality, bases on criteria as laid in Regulations, duly approved by its Board of Directors, which is disclosed on its website.

Accordingly, the Board of Directors of Anjani Portland Cement Limited has adopted the policy for Determination of Materiality of Events for disclosure of material events or information to the stock exchange, which are considered necessary from time to time. The said policy has been modified subsequently after the amendments in applicable provisions.

PURPOSE

The Policy is framed in accordance with the provisions of Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”) for determining materiality of an event/ information and document a process for dissemination of information and disclosures to various stakeholders through appropriate channels.

CATEGORIZATION OF EVENTS OR INFORMATION BASED ON MATERIALITY

Category A: Deemed to be Material

Events or information listed in **Annexure A** shall be deemed as Material Events and the Company shall disclose such events/ information as per the timelines mentioned therein.

Category B: Materiality based on criteria

The Company shall make disclosure of events or information specified in **Annexure B**, based on application of the following criteria for determination of materiality of events/ information:

Qualitative criteria

(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

The omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:

- (i) 2% of turnover, as per the last audited consolidated financial statements of the Company
- (ii) 2% 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
- (iii) 5% of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company.

Note: 'Absolute value of profit or loss after tax' means absolute figures of profit/loss. The profit/loss is required to be computed by taking the absolute values of profit or loss after tax for the immediately preceding three audited consolidated financial statements of the Company. Averaging does not mean netting-off, where profits of the Company in one year gets reduced due to losses in a financial year. The values are required to be taken on an absolute basis.

Category C: Material in the opinion of the Board

Any event or information which, in the opinion of the Board, is material, shall be disclosed to the Stock Exchange(s).

Communication from regulatory authority

In case an event or information is required to be disclosed by the Company, 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.

Events with respect to subsidiaries

The Company shall disclose events or information mentioned in **Annexure A** and **B** happening at the subsidiary(ies) level as per following checks:

1st check - disclose events which are expressly mentioned for subsidiaries

2nd check - if not expressly mentioned for subsidiary, disclose events on application of the quantitative criteria for determination of materiality of events/ information based on consolidated financial statements of the Company

3rd check - if not expressly mentioned for subsidiary and where any event is not quantifiable, disclose event if it has a financial relevance or reputational impact on the Company.

GUIDANCE ON WHEN AN EVENT/INFORMATION IS DEEMED TO HAVE OCCURRED

In instances wherein the disclosure depends upon the stage of discussion, negotiation or approval, the disclosure should be made upon the receipt of approval of the Board of Directors and in certain cases after the same is approved by both, Board of Directors and the shareholders.

Events / information that are price sensitive e.g. decision on declaration of dividend, etc., disclosure shall be made on approval of the event by the Board of Directors, pending Shareholders' approval.

In case in-principle approval or approval to explore (which is not final approval) is given by the Board of

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Directors, then disclosure of such approval is not required.

In all other instances, events/ information shall be said to have occurred when the Company becomes aware of the events/ information, or as soon as, an officer of the Company has, or ought to have reasonably come into possession of the information in the course of the performance of his duties.

RELEVANT EMPLOYEES

‘Relevant employees’ for the purpose of this Policy shall mean all employees with grade or designation KMPs and above and all other employees who would be in the knowledge of any event / information potentially requiring disclosure under this Policy.

IDENTIFICATION AND REPORTING OF POTENTIAL MATERIAL EVENT OR INFORMATION

During performance of one’s role, the relevant employee/(s) shall be responsible for identifying pertinent event/ information as mentioned in Annexure A and B which has potential to be classified as material event/ information as per this Policy.

Any other event, even if not covered in Annexure A and B but is potentially of price sensitive nature, must also be informed for further evaluation, to the Authorized Officers.

The aforesaid details can be submitted to the Authorized Officers using written communication methods such as emails, internal memos, or any other appropriate official means.

AUTHORIZED OFFICERS

Any perceived / potential / determined material event or information which falls under any of the above categories should be reported to any or all of the following “Authorized Officers”:

- a) Managing Director
- b) Chief Financial Officer
- c) Company Secretary

The Managing Director and the Chief Financial Officer shall be severally authorised to determine materiality of an event or information and approve disclosure to the Stock Exchange and on the Company’s website.

The Company Secretary, or in his absence, the Chief Financial Officer shall be severally authorised to make the disclosure of any material event or information duly approved by the Managing Director or the Chief Financial Officer, to the Stock Exchange and on the Company’s website.

Other Employees and Company representatives receiving any inquiries from the investment community shall not respond to such inquiries other than to refer the inquirer to the Managing Director or Company Secretary.

TIMELINES AND CHANNELS FOR DISSEMINATION OF INFORMATION

Disclosure shall be first made to the Stock Exchange where shares of the Company are listed, as soon as reasonably possible but not later than the following:

- **Outcome of meetings of Board of Directors:** within 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:

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Provided that 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, the listed entity shall disclose the decision pertaining to the event or information, within three hours from closure of the board meeting.

Provided further that 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.

- **Emanating from within the Company:** within twelve hours from the occurrence of the event or information
- **Not emanating from within the Company:** within twenty-four hours from the occurrence of the event or information
- **Circular Resolution:** timeline of twelve hours will be applicable and the disclosure timeline will trigger from the point where majority consent is received on the said circular resolution.

In order to bring clarity in the above timelines for disclosure of material events or information, the timeline for disclosure of events is given in **Annexure A** and **B**.

Provided that if all the relevant information, in respect of claims which are made against the listed entity under any litigation or dispute, other than tax litigation or dispute, in terms of sub-paragraph 8 of paragraph B of Part A of Schedule III, is maintained in the structured digital database of the listed entity in terms of provisions of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the disclosure with respect to such claims shall be made to the stock exchange(s) within seventy-two hours of receipt of the notice by the listed entity:

Provided further that disclosure with respect to events for which timelines have been specified in Part A of Schedule III shall be made within such timelines:

Provided further that in case the disclosure is made after the timelines specified under this regulation, the listed entity shall, along with such disclosure provide the explanation for the delay.

Explanation: Normal trading hours shall mean time period for which the recognized stock exchanges are open for trading for all investors. (9:15 a.m. to 3:30 p.m.)

The Company shall, with respect to events/ information disclosed under this Policy, make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.

The Company shall disclose on its website all such events or information which has been disclosed to Stock Exchange under this Policy. Such disclosures shall be hosted on the website of the Company for a minimum period of five years and archived thereafter as per Company's Archival Policy.

DISCLOSURE WITH RESPECT TO REPORTED EVENT OR INFORMATION IN MAINSTREAM MEDIA

With effect from October 1, 2023, the Company shall confirm, deny or clarify any reported event or information in the mainstream media which is not general in nature and which indicates that rumours of an impending

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specific material event or information are circulating amongst the investing public, as soon as reasonably possible and not later than twenty-four hours from the reporting of the event or information.

Reporting current stage of event

If the Company confirms the reported event or information, it shall also provide the current stage of such event or information.

GENERAL PROVISIONS

The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information.

The Company shall follow uniform and universal dissemination of information to avoid selective disclosure.

While dealing with analysts or research persons or large investors like institutions, the Company shall provide only such information which is available publicly.

Any forward looking statements with regards to the Company can be made with the prior approval of the Managing Director. The Company has no obligation, except as required under any of laws in India, to respond/update on such forward looking statements.

This Policy shall be read along with the Company's Code of Conduct for Regulating, Monitoring and Reporting of Trading by Insiders.

In the event of any conflict between the provisions of this Policy and any law, rules, regulations for the time being in force in India, such law, rules and regulations shall prevail over such provisions under this Policy.

DISCLOSURE OF POLICY

The Policy on Determination of Materiality of Events or Information shall be displayed on the Company's Website and the address of such web link shall be provided in the Annual Report of the Company.

REVIEW OF THIS POLICY

The Board of Directors are authorized to review this Policy from time to time and make such modifications as may be deemed necessary.

The Company Secretary is authorized to modify / update the Policy in case of any amendment to the SEBI Listing Regulations or SEBI Insider Trading Regulations and/or to provide guidance / explanation to any of the clauses of the Policy.

INTERPRETATION

In case of any conflict between the provisions of this Policy and Statutory Provisions, the Statutory Provisions shall prevail over this policy. Any subsequent amendment / modification in the Statutory Provisions shall automatically apply to this policy till the amendments / review are carried out in this policy.

Annexure A

Timeline for disclosure of Category A events – Deemed Material:

Sr. No.	Events	Timeline for disclosure
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 associate company of the Company or any other restructuring.</p> <p>“Acquisition” shall mean -</p> <ul style="list-style-type: none"> (i) acquiring control, whether directly or indirectly; or (ii) acquiring or agreement to acquire shares or voting rights in a company, whether existing or to be incorporated, whether directly or indirectly, such that- <ul style="list-style-type: none"> (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 (whether listed or unlisted); 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-paragraph 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 quantitative threshold for determining materiality. <p>Provided that acquisition of shares or voting rights aggregating to five percent or more of the shares or voting rights in an unlisted company and any change in holding from the last disclosure made under this proviso exceeding two per cent of the total shareholding or voting rights in the said unlisted company shall be disclosed on a quarterly basis in the format as may be specified.”</p> <p>“Sale or disposal of subsidiary” and “sale of stake in associate company” shall include -</p> <ul style="list-style-type: none"> (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 listed entity; 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 quantitative threshold for determining materiality. <p>“Undertaking” shall mean an undertaking in which the investment of the company exceeds 20% of its net worth as per the audited balance sheet of the preceding financial year or an undertaking which generates 20% of the total income of the Company during the previous financial year.</p> <p>“Substantially the whole of the undertaking” in any financial year shall mean 20% or more of the value of the undertaking as per the audited balance sheet of the</p>	<p>Within 12 hours*</p> <p>Acquisition of shares or voting rights by listed entities in an unlisted company, aggregating to 5% or any subsequent change in holding exceeding 2%, shall be disclosed quarterly as part of Integrated Filing (Governance).</p>

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	preceding financial year.	
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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.	<p>New Ratings(s) or Revision in Rating(s).</p> <p>The details of any new rating or revision in rating assigned from a credit rating agency to any instrument of the Company or to any fixed deposit programme or to any scheme or proposal of the Company involving mobilization of funds whether in India or abroad.</p> <p>In case of a downward revision in ratings, the Company shall also intimate the reasons provided by the rating agency for such downward revision.</p> <p>The above requirement to disclose rating shall also be applicable to the following:</p> <ul style="list-style-type: none"> a) Revision in rating even if it was not requested for by the Company or the request was later withdrawn by the Company. b) Revision in rating outlook even without revision in rating score. c) ESG ratings by registered ESG Rating Providers. 	Within 24 hours

4.	<p>Outcome of Meetings of the Board of Directors</p> <p>The following shall be disclosed:</p> <ol style="list-style-type: none"> a) dividends recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched b) any cancellation of dividend with reasons thereof c) the decision on buyback of securities 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 e) increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched 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 g) short particulars of any other alterations of capital, including calls h) financial results i) all material events/ information under Category A for which decision was taken in the board meeting. 	<p>As specified in clause (i) of Regulation 30(6) of LODR.</p>
5.	<p>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>	<p>Within 12 hours* (for agreements where the Company is a party); Within 24 hours (for agreements where the Company is not a party).</p>

<p>5A.</p>	<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 Company or impose any restriction or create any liability upon the Company, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the Company is a party to such agreements.</p> <p>Agreements entered into by the Company 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 Company or they are required to be disclosed in terms of this Policy.</p> <p>The term “directly or indirectly” includes agreements creating obligation on the parties to such agreements to ensure that the Company shall or shall not act in a particular manner.</p> <p>Following agreements may require disclosure:</p> <ul style="list-style-type: none"> - SHAs that deal with management or control of the Company - Pledge of holdings by a holding company that may cause change of management - Territorial, product or business allocation agreements - Agreements for ESOPs or warrants not approved or public <p>Following agreements may not require disclosure:</p> <ul style="list-style-type: none"> - Lending agreements requiring lender approval for change of control - Agreements which are already shareholder approved or public, with requisite disclosures, eg. Related Party Transactions - Memorandum of Understanding unless intended to be binding 	<p>Within 12 hours* (for agreements where the Company is a party);</p> <p>Within 24 hours (for agreements where the Company is not a party).</p>
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6.	<p>Fraud or defaults by the 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>‘Fraud’ shall include any act, expression, omission or concealment committed whether in a deceitful manner or not by a person or by any other person with his connivance or by his agent while dealing in securities in order to induce another person or his agent to deal in securities, whether or not there is any wrongful gain or avoidance of any loss, and shall also include-</p> <ol style="list-style-type: none"> (1) a knowing misrepresentation of the truth or concealment of material fact in order that another person may act to his detriment (2) a suggestion as to a fact which is not true by one who does not believe it to be true (3) an active concealment of a fact by a person having knowledge or belief of the fact (4) a promise made without any intention of performing it (5) a representation made in a reckless and careless manner whether it be true or false (6) any such act or omission as any other law specifically declares to be fraudulent (7) deceptive behaviour by a person depriving another of informed consent or full participation (8) a false statement made without reasonable ground for believing it to be true (9) the act of an issuer of securities giving out misinformation that affects the market price of the security, resulting in investors being effectively misled even though they did not rely on the statement itself or anything derived from it other than the market price. <p>‘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>In case of revolving facilities like cash credit, an entity 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>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>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 listed entity.</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.	Within 24 hours of receipt of reasons from auditor
7B.	Resignation of independent director including reasons for resignation.	Within 7 days from date of resignation
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 the resignation comes into effect
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.	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 Company.	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 the Company, in brief.	Within 12 hours*
15.(a)	<p>Schedule of analysts or institutional investors meet at least two working days in advance (excluding the date of the intimation and the date of the meet)</p> <p>Presentations prepared by the listed entity for analysts or institutional investors meet, post earnings or quarterly calls shall be disclosed to the recognized stock exchanges prior to beginning of such events.</p> <p>‘Meet’ shall mean group meetings or group conference calls conducted physically or through digital means.</p> <p>Disclosure of names in the schedule of analysts or institutional investors meet shall be optional for the listed entity.</p>	At least 2 working days in advance (excluding the date of the intimation and the date of the meet)

15.(b)	<p>Audio recordings, video recordings, if any and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means.</p> <p>(i) the audio recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier;</p> <p>(ii) the video recordings, if any, shall be made available on the website within forty-eight hours from the conclusion of such calls;</p> <p>(iii) the transcripts of such calls shall be made available on the website along with simultaneous submission to recognized stock exchanges within five working days of the conclusion of such calls.</p>	For transcripts: Within 5 working days of the conclusion of such calls
16.	Events in relation to the corporate insolvency resolution process (CIRP) under the Insolvency Code.	Within 24 hours
17.	Initiation of Forensic audit	Within 12 hours* (if initiated by the Company); Within 24 hours (if initiated by external agency)
18.	Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel or senior management of the Company, in relation to any event or information which is material for the Company in terms of regulation 30 of these regulations and is not already made available in the public domain by the Company.	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>Notice issued by ROC under Section 206 of Chapter XIV of the Companies Act, 2013 in regard to any inquiry or inspection will not require disclosure unless such inquiry or inspection results in investigation.</p> <p>Following details pertaining to the actions(s) initiated, taken or orders passed need to be provided:</p> <p>i. name of the authority</p> <p>ii. nature and details of the action(s) taken, initiated or order(s) passed</p> <p>iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority</p> <p>iv. details of the violation(s)/contravention(s) committed or alleged to be committed</p> <p>v. impact on financial, operation or other activities of the Company, quantifiable in monetary terms to the extent possible.</p>	Within 24 hours

<p>20.</p>	<p>Action(s) taken 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> <ul style="list-style-type: none"> (a) suspension; (b) Imposition of fine or penalty; (c) settlement of proceedings; (d) debarment; (e) disqualification; (f) closure of operations; (g) sanctions imposed; (h) warning or caution; or (i) any other similar action(s) by whatever name called <p>Exclusions:</p> <ul style="list-style-type: none"> - Show cause notice, as it is not an action initiated or taken - Assessment order by Income Tax authority - Letter seeking clarification by stock exchange - Levying of late / additional fees for delay - Compounding fees <p>Stage of disclosure:</p> <p>On the passing of appropriate orders that amount to ‘an action’. Each of the actions are the culmination of the proceedings. Interim orders may sometimes be given, for example, there may be an interim suspension, which is preventive. That may also need to be disclosed. However, the mere initiation of adjudication proceedings does not come under this clause.</p> <p>The following details pertaining to the actions(s) taken or orders passed need to be provided:</p> <ul style="list-style-type: none"> i. name of the authority ii. nature and details of the action(s) taken, or order(s) passed iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority iv. details of the violation(s)/ contravention(s) committed or alleged to be committed v. impact on financial, operation or other activities of the Company, quantifiable in monetary terms to the extent possible. <p>Explanation – Imposition of fine or penalty shall be disclosed in the following manner along with the details pertaining to the action(s) taken or orders passed as mentioned in the sub-paragraph:</p> <ul style="list-style-type: none"> (i) disclosure of fine or penalty of rupees one lakh or more imposed by sectoral regulator or enforcement agency and fine or penalty of rupees ten lakhs or more imposed by other authority or judicial body shall be disclosed within twenty four hours. (ii) disclosure of fine or penalty imposed which are lower than the monetary thresholds specified in the clause (i) above on a quarterly basis in the format as may be specified. 	<p>Within 24 hours</p> <p>(j) fine or penalty of rupees one lakh or more imposed by sectoral regulator or enforcement agency and fine or penalty of rupees ten lakhs or more imposed by other authority or judicial body shall be disclosed within twenty four hours.</p> <p>(ii) fine or penalty imposed which are lower than the monetary thresholds specified under Para A(20) of Part A of Schedule III of LODR shall be disclosed quarterly as part of Integrated Filing (Governance).</p>
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21.	Voluntary revision of financial statements or the report of the board of directors of the Company under section 131 of the Companies Act, 2013.	Within 12 hours*
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* In case the event or information emanates from a decision taken in a meeting of board of directors, the same shall be disclosed within thirty minutes from the closure of such meeting as against the timeline indicated in the table above.

Annexure B**Timeline for disclosure of Category B events – Materiality based on criteria:**

Sr. No.	Events	Timeline for disclosure
1.	Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division	Within 12 hours*
2.	Any of the following events pertaining to the Company: (i) arrangements for strategic, technical, manufacturing, or marketing tie-up; or (ii) adoption of new line(s) of business; or (iii) closure of operation of any unit, division or subsidiary (entirety or piecemeal)	Within 12 hours*
3.	Capacity addition or product launch.	Within 12 hours*
4.	Awarding, bagging/ receiving, amendment or termination of awarded/ bagged orders/ contracts not in the normal course of business.	Within 24 hours
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.	Within 12 hours* (for agreements where the Company is a party); Within 24 hours (for agreements where the Company is not a party)
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
7.	Effect(s) arising out of change in the regulatory framework applicable to the Company.	Within 24 hours

8.	<p>Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the Company.</p> <p>The Company shall notify the stock exchange(s) upon it or its director or its key management personnel or its senior management or its promoter or its subsidiary becoming party to any litigation, assessment, adjudication, arbitration or dispute in conciliation proceedings or upon institution of any litigation, assessment, adjudication, arbitration or dispute including any ad-interim or interim orders passed against or in favour of the Company, the outcome of which can reasonably be expected to have an impact.</p> <p>Income Tax Assessment Order is covered under this clause.</p> <p>In case the amount involved in ongoing litigations or disputes with an opposing party become material on a cumulative basis, then the same shall also be required to be disclosed to the stock exchange.</p> <p>Explanation - Tax litigations or disputes, including demand notices, penalties, etc., shall be disclosed under sub-para 8 of Para B based on application of criteria for materiality in the following manner:</p> <p>(i) Disclosure of new tax litigations or disputes within twenty-four hours from the receipt of notice by the listed entity.</p> <p>(ii) Quarterly updates on ongoing tax litigations or disputes in the format as may be specified.</p> <p>(iii) Tax litigations or disputes, the outcomes of which are likely to have a high correlation, should be cumulated for determining materiality.</p>	Within 24 hours
9.	Frauds or defaults by employees of the Company which has or may have an impact on the Company.	Within 24 hours
10.	Options to purchase securities including any ESOP/ESPS Scheme.	Within 12 hours*
11.	Giving of guarantees or indemnity or becoming a surety, by whatever name called, including comfort letter, side letter, etc., for any third party.	Within 12 hours*
12.	Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.	Within 24 hours
13.	Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority.	Within 12 hours*

14.	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 any other information which 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 in such securities.	Within 24 hours
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* In case the event or information emanates from a decision taken in a meeting of board of directors, the same shall be disclosed within thirty minutes from the closure of such meeting as against the timeline indicated in the table above.