

POLICY ON DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION & DISCLOSURE ON MATERIAL EVENTS / INFORMATION

1. Introduction:

As per Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), a listed entity is required to frame a policy for determination of materiality of events or information which are required to be disclosed to the Stock Exchanges.

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 specified in para A and B of Part A of Schedule III of the Listing Regulations to the Stock Exchanges.

3. Authority:

This Policy has been adopted by the Board of Directors of Manoj Ceramic Limited (“the Company”) at its Meeting held on 01st January, 2024. The Policy shall also be displayed on the website of the Company.

4. Criteria for determination of materiality of event or information under the Listing Regulations:

The Listing Regulations lay down the following criteria for determining the materiality of event or 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;
- b) the omission of an event or information, which is likely to result in significant market reaction, if the said omission came to light at a later date;
- c) any event/information, which in the opinion of the Board of Directors of listed entity, is material.

5. Disclosure of Events or Information:

- 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. The Company shall make disclosure of events specified in Para B of Part A of Schedule III, based on application of the guidelines for materiality, as specified under the criteria above.

- The Company shall disclose to the stock exchange(s) all material events or information as soon as reasonably possible and not later than twenty-four hours from the occurrence of event or information, in accordance with the provisions of Regulation 30 of the Listing Regulations.

The events specified in Part A of Schedule III of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 shall first be disclosed to Stock Exchange(s) not later than twenty-four hours from the occurrence of event or information.

Provided that in case the disclosure is made after twenty-four hours of occurrence of the event or information, the Company shall, along with such disclosures provide explanation for delay.

The disclosures with respect to events specified in sub-para 4 of Para A of Part A of Schedule III of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 shall be made within thirty minutes of the conclusion of the board meetings

The Company may on its own initiative also, confirm or deny any reported event or information to Stock Exchange(s). In case where an event occurs or an information is available with the Company, which has not been indicated in Para A or B of Part A of Schedule III of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, but which may have material effect on it, the Company is required to make adequate disclosures in regard thereof.

The Company will publicly release all information disclosed to the Stock Exchanges under this Policy, by placing it on its website for a minimum period of five years and thereafter as per the Archival Policy of the Company, as disclosed on website.

6. Authorisation for determination of materiality of event or transaction or information:

The Board of the Company has authorized Managing Director, Chief Financial Officer, Company Secretary/ Compliance Officer for the purpose of determining Materiality of an event or information and for the purpose of making disclosures to the Stock Exchanges. The aforementioned Key Managerial Personnel, authorized for the purpose, will be responsible for administering this Policy, determining the materiality of events or information in relation to the Company and monitoring compliance by the Company with disclosure obligations applicable to it. The contact details of the Key Managerial Personnel, so authorized, will be disclosed to the Stock Exchanges and will be placed on the website of the Company

7. Review & Amendment

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant legislation and remains effective. The board has the right to change/amend the policy as may be expedient taking into account the law for the time being in force.
