



# Castrol India Limited

## Policy for Determination of Materiality for Disclosure of Events or Information

Version	Date of approval by Board of Directors	Effective Date	Version
Current Modification	28 April 2025	29 April 2025	V-3
Previous Modification	31 July 2023	1 August 2023	V-2
Original adoption	24 February 2016	1 January 2016	V-1

# **CASTROL INDIA LIMITED**

## **Policy for Determination of Materiality for Disclosure of Events or Information**

This Policy shall be referred to as “Policy for Determination of Materiality for Disclosure of Events or Information”. This policy shall act as a guideline in determining whether a particular Event or Information (collectively called as “Event/s”) need to be disclosed to the Stock Exchange(s), considering its materiality from the point of view of likely impact on the Company’s business and operations. This policy has been prepared pursuant to SEBI (Listing Obligations and Disclosure Requirements Regulations), 2015 (‘SEBI Listing Regulations’) read with circulars issued thereunder (“SEBI Regulations”) and is subject to the provisions of the law, as amended from time to time.

### **1. Implementation**

It will be the joint responsibility of the Managing Director and Chief Financial Officer of the Company to implement this policy and carry out any subsequent amendment(s) in policy, from time to time.

### **2. Policy Statement**

The Board of Directors of the Company is committed to maintain transparency by sharing all the material information with its investors, which may potentially have an impact on the Company’s operations and business. The information shall be shared as soon as reasonably possible considering the timelines prescribed under law, and periodic updates shall be shared from time to time, when there is a material change in the status. The policy shall serve as guideline and assist the relevant employees of the Company in identifying potentially material Events and reporting the same to the authorized Key Managerial Personnel (KMP) of the Company for determining materiality and for making necessary disclosures to the Stock Exchange(s).

### **3. Review/amendments in the Policy**

The Board of Directors is committed to approving and overseeing implementation of this Policy. The recommendations shall be made to the Board to update this Policy, based on changes that may be required due to any regulatory amendments or otherwise.

### **4. Disclosure of Events**

- a. Chief Financial Officer (CFO) is the KMP authorised to determine materiality of Events and to make disclosure of the same within the timeline prescribed. The Managing Director will be the person authorised for this purpose in the absence of CFO.
- b. Any Event that is likely to be material as per this Policy, shall be brought to the notice of CFO and the Company Secretary promptly by the relevant employee. The CFO will be responsible for ascertaining whether the Event is material and if he/she is of the opinion that the Event may be material. The Company Secretary shall assist the CFO in ascertaining materiality of a given event.

If materiality of an event cannot be predicted with accuracy but can reasonably be considered to be close to materiality threshold, then a Working Group shall be formed comprising CFO, MD, Whole-time Directors, Managing Counsel, Head- Communications and Company Secretary (as per the availability and relevance of the event) to collect the relevant facts to assist the CFO to make a decision as regards to materiality assessment and dissemination of Events. The Working Group may obtain views of the Board, Chairperson and/or Audit Committee Chairperson, depending upon the facts of each case. This shall be done keeping in mind timeline prescribed for dissemination of events.

The relevant Senior Management Personnel and such other persons, as determined by them, shall be relevant employees for the purpose of this Policy, to identify potential event or information pertaining to their respective functions and report the same to the CFO and the Company Secretary.

- d. The CFO or the Working Group, as the case may be, shall take into account, impact on operations and confidentiality aspect from the point of view of business interests of the Company and determine the appropriate time at which disclosures are to be made to the Stock Exchange(s).
- e. The Company shall, with respect to disclosures referred to in this policy, make disclosures updating material developments on a regular basis, till such time the Event is resolved/closed with relevant explanations.
- e. The information shall not be shared with any person other than the above (except on need to know' basis) unless it is shared with the Stock Exchange(s) first.
- f. The communication/press release/ holding statement or subsequent presentations to the investors shall be uploaded on the Company's website immediately thereafter.
- g. All disclosures shall be available on the website of the Company for a period of 5 (five) years and thereafter in accordance with the Archival Policy of the Company.
- h. The CFO together with the Company Secretary shall formulate operating guidelines for deployment of this Policy.

## **5. Material Events and test of Materiality**

- I. In terms of Regulation 30 of the SEBI Listing Regulations, the Company is required to make disclosures of any events/information which, in the opinion of the Board of the Company, is material. Further the events/information specified under Regulation 30 read with Para A of Part A of Schedule III of SEBI Regulations as listed in "**Annexure A**" and as may be amended from time to time, are deemed material and shall be disseminated to the Stock Exchange(s).
- II. The events/information specified under Regulation 30 read with Para B of Part A of Schedule III of SEBI Regulations as listed in "**Annexure B**" and as may be amended from time to time, shall be disclosed based on application of the guidelines for materiality, as specified below:

- (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; or
- (c) the omission of an event or information, whose value or expected impact in terms of value exceeds the lower of the following:
  - (i) 2% (two percent) of turnover, as per the last audited financial statements of the Company;
  - (ii) 2% (two percent) of net worth, as per the last audited financial statements of the Company, except in case the arithmetic value of the net worth is negative;
  - (iii) 5% (five percent) of the average of absolute value of profit or loss after tax, as per the last 3 (three) audited financial statements of the Company;

An Industry Standard Note('ISF Note') setting out the standard operating procedures for compliance with the continuous disclosure requirements, are issued by the Industry Standard Forum (ISF) in consultation with SEBI .The ISF Note *inter alia*, covers application of thresholds, disclosure timelines and a guidance on the parameters to be considered for determination of materiality for different types of events. Accordingly, for every event / information listed Part A of Schedule III of the SEBI Listing Regulations, reference should be made to the ISF Note, or any other circular(s), issued by SEBI or Stock Exchanges from time to time.

- (d) Incase where the criteria specified in sub clauses (a) to (c) 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 events/information is considered material.
- IV Any other event/information 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 Company which may be necessary to enable the shareholders of the Company to appraise their position and to avoid the establishment of a false market in the shares of the Company.
- V Without prejudice to the generality of the above, the Company may make disclosures of event/information as specified by the Board of Directors of the Company, from time to time.

## 6. Timeline for Disclosure of events/information

The Company shall first disclose to the Stock Exchange(s) all Events which are material 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 of Directors in which the decision pertaining to the event or information has been taken;

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 the 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

- ii. twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the Company;
- 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.

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, 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 that disclosure with respect to events for which timelines have been specified in Part A of Schedule III shall be made within the prescribed timelines.

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

7. This Policy shall be read together with the following Code formulated pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015:

- Code of Conduct to Regulate, Monitor And Report Trading by Insiders And Designated Persons; and
- Code Of Practices And Procedures For Fair Disclosure Of Unpublished Price Sensitive Information.

8. Any subsequent amendments/ modifications in SEBI Listing Regulations and/ or other applicable laws in this regard shall automatically apply and the Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), modification(s), etc., even if not expressly incorporated in this Policy.

## **Annexure 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 or restructuring), sale or disposal of any unit(s), division(s), whole or substantially the whole of the undertaking(s) or subsidiary of the listed entity, sale of stake in associate company of the listed entity or any other restructuring.</p> <p>Explanation 1 - For the purpose of this sub-para, the word 'acquisition' shall mean:</p> <p>(i) acquiring control, whether directly or indirectly; or,</p> <p>(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 –</p> <p>(a) the listed entity holds shares or voting rights aggregating to 20% or more of the shares or voting rights in the said company, or;</p> <p>(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 5% of the total shareholding or voting rights in the said company; or</p> <p>(c) the cost of acquisition or the price at which the shares are acquired exceeds the threshold specified in sub-clause (c) of clause (i) of sub-regulation (4) of regulation 30 (i.e. quantitative materiality threshold).</p> <p>Provided that acquisition of shares or voting rights aggregating to 5% 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 2% 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>Explanation 2 - For the purpose of this sub-paragraph, “sale or disposal of subsidiary” and “sale of stake in associate company” shall include-</p> <p>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</p> <p>(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 (c) of clause (i) of sub-regulation (4) of regulation 30 (i.e. quantitative materiality threshold).</p> <p>Explanation 3 - 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>
2	<p>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.</p>

3	New Rating(s) or Revision in Rating(s).
4	<p>Outcome of Meetings of the board of directors: The listed entity shall disclose to the Exchange(s), the following:</p> <ul style="list-style-type: none"> <li>a) dividends recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched;</li> <li>b) any cancellation of dividend with reasons thereof;</li> <li>c) the decision on buyback of securities;</li> <li>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;</li> <li>e) increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched;</li> <li>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;</li> <li>g) short particulars of any other alterations of capital, including calls;</li> <li>h) financial results;</li> <li>i) decision on voluntary delisting by the listed entity from stock exchange(s):</li> </ul> <p>All events that are Material as per Para A or Para B List and decision pertaining to the same is taken by the Board at its meeting.</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 listed entity), 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.

5A	<p>Agreements entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the listed entity or of its holding, subsidiary or associate company, among themselves or with the listed entity 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>
6.	<p>Fraud/defaults by a listed entity, its promoter, director or key managerial personnel or senior management or subsidiary or arrest of key managerial personnel or senior management, promoter or director of the listed entity, 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, 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>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 listed entity.</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 listed entity</p>



7	Change in directors, key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer , Company Secretary etc.), senior management, Auditor and Compliance Officer.
7A	In case of resignation of the auditor of the listed entity, detailed reasons for resignation of auditor, as given by the said auditor, shall be disclosed by the listed entities to the stock exchanges as soon as possible but not later than twenty four hours of receipt of such reasons from the auditor.
7B	<p>Resignation of independent director including reasons for resignation: In case of resignation of an independent director of the listed entity, within seven days from the date of resignation, the following disclosures shall be made to the stock exchanges by the listed entities:</p> <p>i. The letter of resignation along with detailed reasons for the resignation as given by the said director.</p> <p>ia. Names of listed entities in which the resigning director holds directorships, indicating the category of directorship and membership of board committees, if any.</p> <p>ii. The independent director shall, along with the detailed reasons, also provide a confirmation that there is no other material reasons other than those provided.</p> <p>iii. The confirmation as provided by the independent director above shall also be disclosed by the listed entities to the stock exchanges along with the disclosures as specified in sub-clause (i) and (ii) above.</p>
7C	In case of resignation of key managerial personnel, senior management, Compliance Officer or director other than an independent director; the letter of resignation along with detailed reasons for the resignation as given by the key managerial personnel, senior management, Compliance Officer or director shall be disclosed to the stock exchanges by the listed entities within seven days from the date that such resignation comes into effect.
7D	In case the Managing Director or Chief Executive Officer of the listed entity was indisposed or unavailable to fulfil the requirements of the role in a regular manner for more than 45 days in any rolling period of 90 days, the same along with the reasons for such indisposition or unavailability, shall be disclosed to the stock exchange(s).
8	Appointment or discontinuation of share transfer agent
9	<p>Resolution plan/ Restructuring in relation to loans/borrowings from banks/financial institutions including the following details:</p> <p>i) Decision to initiate resolution of loans/borrowings;</p> <p>(ii) Signing of Inter-Creditors Agreement (ICA) by lenders;</p> <p>(iii) Finalization of Resolution Plan;</p> <p>(iv) Implementation of Resolution Plan;</p> <p>(v) Salient features, not involving commercial secrets, of the resolution/ restructuring plan as decided by lenders.</p>
10	One time settlement with a bank.
11	Winding-up petition filed by any party / creditors.

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.
13	Proceedings of Annual and extraordinary general meetings of the listed entity.
14	Amendments to memorandum and articles of association of listed entity, in brief.
15	<p>(a) (i) 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>(ii) 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>Explanation I: For the purpose of this clause 'meet' shall mean group meetings or group conference calls conducted physically or through digital means.</p> <p>Explanation II: Disclosure of names in the schedule of analysts or institutional investors meet shall be optional for the listed entity</p> <p>(b) Audio recordings, video recordings, if any and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means, in the following manner:</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>(ii) 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>

16	<p>The following events in relation to the corporate insolvency resolution process (CIRP) of a listed corporate debtor under the Insolvency Code:</p> <ul style="list-style-type: none"> <li>a) Filing of application by the corporate applicant for initiation of CIRP, also specifying the amount of default;</li> <li>b) Filing of application by financial creditors for initiation of CIRP against the corporate debtor, also specifying the amount of default;</li> <li>c) Admission of application by the Tribunal, along with amount of default or rejection or withdrawal, as applicable ;</li> <li>d) Public announcement made pursuant to order passed by the Tribunal under section 13 of Insolvency Code;</li> <li>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;</li> <li>f) Appointment/ Replacement of the Resolution Professional;</li> <li>g) Prior or post-facto intimation of the meetings of Committee of Creditors;</li> <li>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;</li> <li>i) Number of resolution plans received by Resolution Professional;</li> <li>j) Filing of resolution plan with the Tribunal;</li> <li>k) Approval of resolution plan by the Tribunal or rejection, if applicable;</li> <li>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: <ul style="list-style-type: none"> <li>(i) Pre and Post net-worth of the company;</li> <li>(ii) Details of assets of the company post CIRP;</li> <li>(iii) Details of securities continuing to be imposed on the companies' assets;</li> <li>(iv) Other material liabilities imposed on the company;</li> <li>(v) Detailed pre and post shareholding pattern assuming 100% conversion of convertible securities;</li> <li>(vi) Details of funds infused in the company, creditors paid-off;</li> <li>(vii) Additional liability on the incoming investors due to the transaction, source of such funding etc.;</li> <li>(viii) Impact on the investor – revised P/E, RONW ratios etc.;</li> <li>(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;</li> <li>(x) Brief description of business strategy.</li> </ul> </li> <li>m) Any other material information not involving commercial secrets.</li> <li>n) Proposed steps to be taken by the incoming investor/acquirer for achieving the MPS;</li> <li>o) Quarterly disclosure of the status of achieving the MPS;</li> <li>p) The details as to the delisting plans, if any approved in the resolution plan.</li> </ul>
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17	<p>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 listed entities:</p> <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 listed entity 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>
18	<p>Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel or senior management of a listed entity, 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 listed entity.</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>
19	<p>Action(s) initiated or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the listed entity, 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 (Inspection, Enquiry or Investigation by ROC);</p> <p>along with the following details pertaining to the actions(s) initiated, taken or orders passed:</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 listed entity, quantifiable in monetary terms to the extent possible.</p>

20	<p>Action(s) taken or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the listed entity, in respect of the following:</p> <ul style="list-style-type: none"> <li>(a) suspension;</li> <li>(b) imposition of fine or penalty;</li> <li>(c) settlement of proceedings;</li> <li>(d) debarment;</li> <li>(e) disqualification;</li> <li>(f) closure of operations;</li> <li>(g) sanctions imposed;</li> <li>(h) warning or caution; or</li> <li>(i) any other similar action(s) by whatever name called; along with the following details pertaining to the actions(s), taken or orders passed: <ul style="list-style-type: none"> <li>i. name of the authority;</li> <li>ii. nature and details of the action(s) taken, or order(s) passed;</li> <li>iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority;</li> <li>iv. details of the violation(s)/contravention(s) committed or alleged to be committed;</li> <li>v. impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible.</li> </ul> </li> </ul> <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"> <li>(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.</li> <li>(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 by SEBI.</li> </ul>
21	<p>Voluntary revision of financial statements or the report of the board of directors of the listed entity under section 131 of the Companies Act, 2013.</p>

## **Annexure 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.
2	Any of the following events pertaining to the listed entity: (a) arrangements for strategic, technical, manufacturing, or marketing tie-up; or (b) adoption of new line(s) of business; or (c) closure of operation of any unit, division or subsidiary (in entirety or in 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) 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	Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the listed entity.
9	Frauds or defaults by employees of the listed entity which has or may have an impact on the listed entity.
10	Options to purchase securities including any ESOP/ESPS Scheme.
11	Giving of guarantees or indemnity or becoming a surety by whatever named called, for any third party.
12	Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
13	Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority.