

## **PREAMBLE**

**Some information or events pertaining to the company are price sensitive and are anticipated to materially affect the price or value of the company's securities on the stock market. In terms of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), immediate disclosure of such material information to the stock exchanges is required. Every listed entity is required to have a policy for determining the materiality of events and information that necessitates proper disclosure to stock exchanges in accordance with Listing Regulation 30(4). As a result, this Policy aims to establish, among other things, what counts as a material event or piece of information for the Company and necessitates immediate disclosure.**

**Applicable provisions of the Companies Act, 2013 and the SEBI Regulations pertaining to Policy for Determination of Materiality which are not specifically covered in this Policy shall be deemed to form part of this Policy. The Board may amend, abrogate, modify or revise any or all provisions of this Policy. However, amendments in the Act or in the applicable SEBI Regulations shall be binding even if not incorporated in this Policy.**

## **MANGALAM CEMENT LIMITED**

### **Policy for Determination of Materiality for Disclosures as required by Securities and Exchange Board of India (Listing Obligations and Disclosures Requirement) Regulation, 2015**

#### **1. OBJECTIVES:**

The objective of this policy is to define materiality as required under Regulation 30(4)(ii) of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Regulation") for timely and adequate disclosure of events to Stock Exchanges.

#### **2. SCOPE:**

The Policy is applicable to Mangalam Cement Limited

#### **3. CRITERIA FOR DETERMINATION OF MATERIALITY OF EVENTS/ INFORMATION**

The Company shall follow the following criteria for determination of materiality of the 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; or
- (c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
  - (i) two percent of turnover, as per the last audited consolidated financial statements of the listed entity;
  - (ii) two percent of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;
  - (iii) five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the listed entity.
- (d) In case, where the criteria specified in sub-clause (a), (b) and (c) are not applicable, an event/information may be treated as being material if in the opinion of the board of directors of the Company, the event/information is considered material.

#### **4. MATERIAL EVENTS / MATERIAL INFORMATION**

- (a) Events/Information as set out in Para A of Part A of Schedule III read with Regulation 30 of the Listing Regulations without application for guidelines for materiality specified in sub section (4) of the Listing Regulation 30.
- (b) Events/Information shall be considered material subject to the application of the criteria for determination of materiality of events/ information in line with Para B, C & D of Part A of Schedule III read sub section (4) of the Listing Regulation 30.

Further, in case of any event /information not falling under the above but may be treated as material shall also be evaluated based in the threshold criteria mentioned under Para 3 of this Policy.

The Company shall disclose all events or information with respect to its subsidiaries which are material for the Company in accordance with the requirements of the Listing Regulations.

**5. TIMELINE FOR DISCLOSURE OF INFORMATION TO STOCK EXCHANGES**

Disclosure of the events/information shall be made within the timelines prescribed under the Listing Regulations, as amended from time to time.

**6. AUTHORISATION FOR DISCLOSURES**

All of the Key Managerial Personnel of the Company are severally authorised for the purpose of determining materiality of events or information and for the purpose of making disclosures to Stock Exchanges under the Regulation. Such disclosures shall be signed by the Company Secretary or any other Key Managerial Personnel of the Company.

Contact detail of such Key Managerial Personnel are as under:

**Mangalam Cement limited**  
**P.O. Aditya Nagar, Morak-326520**  
**Dist. Kota, Rajasthan,**  
**Tel: +91-07459-233127**  
**E-mail: shares@mangalamcement.com**

**7. AMENDMENT**

The Board of Director may amend/modify any part of this policy or the entire policy at any time as may be deemed necessary and the decision of the board in this regard shall be final and binding. However, no such amendments or modification shall be inconsistent with the applicable provision of any law for the time being in force.

**8. POSTING OF POLICY ON THE CORPORATE WEBSITE**

The aforesaid policy shall also be posted on the corporate website.