

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

Introduction

Regulation 30(4) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “the Regulations”) requires every listed entity to frame a policy for determination of materiality of events or information that requires appropriate disclosure to the stock exchange(s).

Accordingly, the Policy for determination of Materiality of events or information (hereinafter referred to as “the policy”) for INDIAN ACRYLICS LIMITED (hereinafter referred to as “the Company”) is hereby framed, setting forth the elementary aspects regarding disclosure practice to be followed by the Company.

Designated Authority for evaluating Events/Information as ‘material’

The Regulations provide that the Board of Directors of the Company shall authorize one or more Key Managerial Personnel (KMP) for the purpose of determining materiality of an event or information and for the purpose of making disclosure to the stock exchanges under the Regulations.

Managing Director, Additional Managing Director and Company Secretary, jointly or severally, shall take a view on materiality of an event or information qualifying for disclosure under clause 30 of the Regulations, decide the appropriate time at which such disclosure is to be filed with Stock Exchange(s) and details that may be filed in the best interest of present and potential investors.

The above KMPs are jointly or severally authorized for making disclosures of such material events or information, to the Stock Exchange(s).

The contact details of Company Secretary authorized for purpose of determining materiality and making disclosures as per Regulation 30(5) of SEBI(LODR) Regulations, 2015 is as under:

Name	Designation	Email ID	Contact Number
Shri Rajinder Kumar Garg	Managing Director	shares@indianacrylics.com	01722792385
Shri Dheeraj Garg	Additional Managing Director	shares@indianacrylics.com	01722792385
Shri Bhavnesh Kumar Gupta	Company Secretary & Compliance Officer	shares@indianacrylics.com	01722792385

Criteria for Determining Materiality

While determining whether an event or information is material, the designated authority shall consider the criteria given in sub-regulation (4) of Regulation 30 of the SEBI Regulations, enumerated herein 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;
- (c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 1. two percent of turnover, as per the last audited consolidated financial statements of the Company
 2. two percent 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;
 3. 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 Company;
- d) In case where the criteria specified in sub-clauses (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the listed entity, the event or information is considered material:

Timeline of Disclosures

The listed entity shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions of this regulation 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;
- (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:

Disclosure with respect to events for which timelines have been specified in Part A of Schedule III shall be made within such timelines.

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, but which may have material effect on it, the Company is required to make adequate disclosures in regard thereof

In case an event or information is required to be disclosed by the Company in terms of the provisions of regulation, 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.

Disclosure on Website

All material events or information, as disclosed to the Stock Exchange(s) under the Regulations, shall also be disclosed on the website of the Company www.indianacrylics.com and such disclosures shall be hosted on the website for a minimum period of five years and thereafter as per the Archival Policy of the Company.

Amendments/Modification of the Policy

In case of any subsequent changes in the provisions of Acts/Regulations, which makes any of the provisions in the Policy inconsistent with the Act or Regulations, the provisions of the Acts/ Regulations would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law. Amended policy shall be effective from 14.07.2023
