

POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

Policy:

As per Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, a listed entity shall make disclosures of any events or information which, in the opinion of the board of directors of the listed Company is material.

Qualitative criteria: The Company shall frame a policy for determination of materiality, based on the criteria specified below:

- a. the omission of an event or information, 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. where the criteria specified in sub-clauses (a) and (b) 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.

Further the following materiality criteria shall be adopted in the case of the Company, its Subsidiaries and Associate Companies with respect to transactions for reporting to the Stock Exchange.

Quantitative criteria: The event / information will be considered material based on above criteria, where the value involved or the impact:

- a. Exceeds 10% of the Company's consolidated gross income; or
- b. Exceeds 10% of the Company's consolidated net worth

Whichever is lower



Events which shall be disclosed without any application of the guidelines for Materiality as specified in regulation 30(4)

1. Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation/ merger/ demerger/ restructuring), or sale or disposal of any unit(s), division(s) or subsidiary of the listed entity or any other restructuring;
2. Issuance or forfeiture of securities, split or consolidation of shares, buy back 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;
3. Revision in rating(s);
4. Outcome of meetings of the Board of Directors held to consider the following:
 - a. Dividends and/ or cash bonuses recommended or declared or the decision to pass any dividend and the date on which the dividend shall be paid/ dispatched;
 - b. Any cancellation of dividend with reasons thereof;
 - c. Decision to buy-back securities of the Bank;
 - d. Decision with respect to any proposed fund raising;
 - 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/ securities held in reserve for future issue or 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 alteration of capital, including calls;
 - h. Financial results; i. Decision on voluntary delisting by the Bank from the Stock Exchange(s);
5. Agreements [viz. shareholder agreement(s), joint venture agreement(s), family settlement agreements, (to the extent that it impacts the management and control of the Bank), agreement(s)/ treaty (ies) / contract(s) with media companies] which are binding and not in the normal course of business, revision(s) or amendment(s) and termination(s) thereof;
6. Frauds/ defaults by the promoter or Key Managerial Personnel (KMP) or by the Bank or arrest of any KMP or promoter;



The image shows a handwritten signature in blue ink, which appears to be 'Sankalp', written over a circular blue stamp. The stamp contains the text 'SANKALP ENTERPRISES (INDIA) LIMITED HYDERABAD' around the perimeter and a star symbol at the bottom.

7. Change in directors, key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.), Auditor and Compliance Officer;
8. Appointment/ discontinuation of Share Transfer Agent;
9. Corporate Debt Restructuring of the Bank;
10. One time settlement with a lender(s) by the Bank of its own borrowings, if any;
11. Winding up petition filed by any party/ creditors of the Bank;
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 Bank;
13. Proceedings of the annual and extra-ordinary general meetings of the Bank;
14. Amendments to memorandum and articles of association of the Bank, in brief;
15. Schedule of analyst or institutional investor meet and presentations on financial results made by the Bank to analysts or institutional investors; and
16. Events in relation to the corporate insolvency resolution process of a listed corporate debtor under the Insolvency code.

Events which shall be disclosed upon application of the guidelines for Materiality as specified in regulation 30(4)

1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2. Change in the general character or nature of business brought about by arrangement for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division (entirety or 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 agreements(s) (as a borrower) or any other agreements(s) which are binding and not in normal course of business) and revisions(s) or amendments(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. Litigation(s) / dispute(s) / regulatory action (s) with impact.
9. Fraud / defaults etc. by directors (other than key managerial personnel) or employees of listed entity.
10. Options to purchase securities including any ESOP /ESPS Scheme.
11. Giving of guarantees or indemnity or becoming a surety for any third party.
12. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

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 brief details thereof and any other information which is exclusively known to the listed entity which may be necessary to enable the holders of securities of the listed entity to appraise its position and to avoid the establishments of a false market in such securities.

Without prejudice to the above the Company may make disclosure of events and information as may be decided by the Board from time to time.

Person responsible for making disclosure or Material Events and Information to Stock Exchange

The Board of Directors of the Company shall authorize one or more Key Managerial Personnel (KMPs) for the purpose of determining materiality of an event or information and of the purpose of making disclosures to stock exchange(s) under this regulation. The following KMPs are hereby severally authorized by Board of Directors for this purpose:

- a. Managing Director;
- b. Chief Financial Officer; and
- c. Company Secretary

Scope and Limitation

In the event of any conflict between the provisions of this Policy and the Act or Listing Regulations or any other statutory enactments or rules, the provisions of Listing Regulations / Act or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.



The image shows a handwritten signature in blue ink over a circular blue stamp. The stamp contains the text "L. ENTERPRISES (INDIA) LIMITED" around the top edge and "BOARD" in the center. There are also some smaller, less legible characters within the stamp.

Disclosure:

The Company shall disclose on its website all such events or information which has been disclosed to the relevant stock exchange under this policy, and such disclosures shall be hosted on the website of the Company for a minimum period of 5 years and, thereafter, as per the archival policy of the Company.

Effective date of Policy:

The policy shall be effective from the date of approval of Board of directors: i.e. February 11, 2021 and same shall available on the Company's website www.starliteglobal.in



A handwritten signature in blue ink is written over a circular blue stamp. The stamp contains the text "STARLITE GLOBAL LIMITED" around the perimeter and "DEBAG" in the center. There is also a small star symbol at the bottom of the stamp.