



## MYSORE PETRO CHEMICALS LIMITED

### BOARD POLICY FOR DETERMINATION OF MATERIAL EVENTS OR INFORMATION

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#### Objective

The Board Policy for Determination of Material Events or Information (“the Policy”) stems from the Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Obligations”) which mandates all listed companies to adopt a framework for the determination of material events or information and the disclosure thereafter to the stock exchanges.

This Policy has been updated based on the amendments made vide SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2023 (“SEBI Listing Obligations”) and the SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123, dated July 13, 2023 (“SEBI Disclosure Circular”).

#### Scope

The Policy aims to assist the employees of the Company in identifying potential material events or information that may occur and which should be promptly disclosed and reported to the authorized Key Managerial Personnel of the Company as specified in this Policy for determining the materiality of the said event or information and for making the necessary disclosure to the stock exchange.

#### 1. Definitions

“**Board**” means the Board of Directors of the Company.

“**Company**” means Mysore Petro Chemicals Limited.

“**Key Managerial Personnel**” means the Key Managerial Personnel of the Company as defined under Section 203 of the Companies Act, 2013

“**Policy**” means Board Policy for determination of material events or information.

“**Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

#### 2. Determination of material events or information

All events which are specified in Para A of Part A of Schedule III of the LODR Regulations (as applicable from time to time) are deemed to be material events and the Company shall disclose the same without any application of the guidelines for materiality as specified in sub-regulation (2) of Regulation 30 of the SEBI Listing Regulations in accordance with the format as prescribed by SEBI from time to



time.

### **3. Events based on application of guidelines for materiality**

All events which are specified in Para B of Part A of Schedule III of the LODR Regulations (as applicable from time to time) are deemed to be material events subject to application of guidelines for materiality, as specified in sub-regulation (4) of Regulation 30 of the SEBI Listing Regulations and in accordance with the following criteria:

- i. the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
- ii. 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
- iii. 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;
- iv. If the criteria specified in (iii) above is not applicable, an event or information may be treated as being material if in the opinion of the Board of directors of Company, the event or information is considered material.

The Company shall disclose the same in accordance with the format as prescribed by SEBI from time to time.

### **4. Authorization to Key Managerial Personnel for determining the materiality of event or information**

The Key Managerial Personnel comprising of the Managing Director, Chief Financial Officer and Company Secretary of the Company are severally authorized for the purpose of determining the materiality of event or information and reporting of such events or information to the stock exchanges. The contact details of such Key Managerial Personnel shall be disclosed to the stock exchanges and also posted on the website of the Company.

The Board may from time to time designate or nominate any other Key Managerial Personnel for the purpose of compliance with the provisions of Regulation 30(5). Any such change shall be duly intimated to the stock exchanges and notified on the Company's website.

### **5. Procedure for the disclosure of events or information**

All events/information which are material in terms of the provision of the SEBI Listing Regulations and under this Policy shall be disclosed 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:

In case the disclosure is made after the specified timelines, the Company shall along with the disclosure provide an explanation for the delay.

The Company shall make disclosures updating material developments on regular basis, till such time the event is resolved / closed, with relevant explanations.

## **6. Amendment to the Policy**

The Policy shall be subject to the review by the Board from time to time in accordance with the changes in the Regulations and any changes to the Policy shall be effective only upon its approval by the Board.

In the event of any conflict between the Policy and the Regulations, the provisions of the Regulations shall prevail to that extent.

## **7. Enforcement of the Policy**

The Policy shall be enforced with effect from the date of its approval by the Board. The Company Secretary shall be authorized to communicate the Policy to all concerned and to ensure the effective implementation thereof.

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**The above policy was adopted by the Board of Directors on  
11<sup>th</sup> February, 2016 and modified on 1<sup>st</sup> September, 2023**