



FACOR ALLOYS LIMITED

POLICY ON DETERMINATION OF MATERIALITY OF EVENT OR INFORMATION

(As approved by the Board of Directors on 10TH February 2022)



FACOR ALLOYS LIMITED

POLICY ON DETERMINATION OF MATERIALITY OF EVENT OR INFORMATION

Introduction

The following Policy on Determination of Materiality of Event or Information ("Policy") is issued in pursuance of the requirements of Regulation 30 of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 (hereinafter referred to as "SEBI Listing Regulations") for determination of material events or information to be disclosed to Stock Exchange.

Authorized Persons

Pursuant to Regulation 30 (5) of Listing Regulations, the Managing Director and Company Secretary of the Company (Key Managerial Personnel) shall be authorized severally to determine the materiality of an event or information to be disclosed to Stock Exchange in terms of the Policy.

Material Events or Information

- i) Events or information specified in Para A of Part A of Schedule III of the SEBI Listing Regulations as may be amended from time to time shall be disclosed as events which are "deemed" to be material, without any application of the guidelines for materiality.
- ii) Events or information specified in Para B of Part A of Schedule III of the SEBI Listing Regulations as may be amended from time to time shall be disclosed upon application of the guidelines of materiality referred in Regulation 30 (4).
- iii) The criteria as specified in Regulation 30 (4) of the SEBI Listing Regulations will be applicable for determination of materiality of an event or information, which includes the following:
 - (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) In case 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.
- iv) Events or information specified in Para C of Part A of Schedule III of the SEBI Listing Regulations viz., major development that is likely to affect business of the Company, 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 holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities.
- v) Any other event or information, as specified by SEBI from time to time shall also be disclosed to the Stock Exchange.
- vi) If, in the opinion of the Board, any event or information is considered as material, the same shall be disclosed to Stock Exchange.

In addition to the above, the stipulations in the "Code of Conduct and Fair Disclosure Procedure for Regulating, Monitoring, Reporting and Prohibition of Insider Trading In FAL", as approved by the Board of Directors of the Company in terms of the provisions under the SEBI (Prohibition of Insider Trading) Regulations, 2015 shall also be taken into account for disclosure of any event/information.

Disclosure to Stock Exchange:

- i) Disclosure shall be made to the Stock Exchange of all events or information as soon as reasonably possible, but not later than twenty-four hours from the occurrence of events or information.
- ii) The outcome of the meetings of the Board of Directors to consider the specified items as mentioned in Schedule-III shall be disclosed within 30 minutes of the closure of the meeting.
- iii) In case of delay of such disclosure, explanation for the delay shall be provided.
- iv) The Company shall provide updates of material developments of all material events or information till such time the event is resolved/closed, with relevant explanations.

- v) The Company shall also disclose all events or information with respect to Subsidiaries which are material for the Company.

Review:

The Policy shall be subject to review by the Board from time to time.