# Policy for Determination of Materiality of Events or Information

# POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

## BACKGROUND

With a view to enable investors to make well informed decisions, Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 *("Listing Regulation")* requires every listed entity to make timely, adequate and accurate disclosure of any event or information which, in the opinion of its Board of Directors *("Board")* is material. Further, the sub-regulation 4 of listing regulation also provides for framing a policy for Determination of Materiality of events or information, based on the criteria specified therein.

Hence in view of the above, this Policy for Determination of Materiality of events or information *("Policy")* has been framed to provide necessary guidelines to the Board for determination of the materiality of events and information and to make timely, adequate and accurate disclosures of information or events which could affect the investment decisions of the investors

This Policy has been formulated in accordance with Clause (ii) of sub-regulation (4) of Regulation 30 of the Listing Regulations.

### MATERIAL DISCLOSURES

The Company shall within the prescribed time disclose all such material events to the Stock Exchanges where **the Securities of the Company are listed as:**

a. Specified in Para A of Part A of Schedule III of the Listing Regulations without any application of guidelines for materiality as specified in sub regulation (4) of Regulation 30 of Listing Regulations;

b. Specified in Para B of Part A of Schedule III of the Listing Regulations subject to application of guidelines for materiality as specified in sub regulation (4) of Regulation 30 of Listing Regulations;

c. any other events/ information viz. any 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 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; and

d. any other information as may be determined by the Board from time to time.

### CRITERIA FOR DETERMINING MATERIALITY:

Materiality shall be determined on case to case basis depending on the specific facts and circumstances relating to the event/ information relevant to the Company. A particular event/ information will be considered as material in nature, if it substantially alters/ impacts the existing composition of revenue/ profits of the Company. The board shall determine the materiality of event/ information in Para B of part A of Schedule III on the basis of criteria specified in sub regulation (4) of Regulation 30 of Listing Regulations.

### GUIDELINES FOR DETERMINING WHEN THE MATERIAL EVENT/ INFORMATION HAS OCCURRED

The determination of the time when material event/information can be said to have occurred would depend either upon the stage of negotiation/discussion or approval and the events where no such negotiation/ discussion or approval is required, the event/information can be said to have occurred as and when the management become aware of the same.

**AUTHORISED KEY MANAGERIAL PERSONNEL (KMP) FOR DETERMINING THE MATERIALITY**

The following KMP's are hereby jointly and/or severally authorized by the Board of Directors for determining materiality of an event or information for the purpose of making disclosures to the Stock Exchanges:

| Name | Designation | Email Id |
|---|---|---|
| Mr. Mukesh Jeram Vasani | Director<br>(DIN: 06542536) | mukesh@aimtron.com |
| Mr. Nirmal M Vasani | Director<br>(DIN: 07442862) | nirmal@aimtron.com |

**DISCLOSURES**

a. The Chairman & Managing Director, Executive Director and Company Secretary of the Company are authorised for ascertaining the materiality of events/ information considering its nature and to disclose it to the Stock Exchanges after taking into consideration various provisions of Listing Regulation and this Policy.

b. The Company shall use the electronic facilities provided by the Stock Exchanges for dissemination of the said event/ information.

c. Statutory timeframes for disclosure shall be adhered to delay, if any, should be sufficiently explained along with the disclosure.

**AMENDMENT**

Any change in the Policy shall be approved by the Board of the Company. The Board shall have the right to withdraw and/ or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

In case any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed thereunder and Listing Regulations ("Statutory Provisions"), the provisions of Statutory Provisions shall prevail.

**DISSEMINATION OF THE POLICY**

The policy shall be hosted on the website of the Company i.e. https://www.aimtron.in

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Effective Date: 01/11/2023

Date of Approval by Board of Directors: 01/11/2023