

# **COROMANDEL AGRO PRODUCTS AND OILS LIMITED**

## **(MATERIALITY POLICY DETERMINATION AUTHORITY)**

### **1. LEGAL FRAMEWORK:**

As per the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (the "Regulations"), the Company is required to disclose to the Stock Exchanges events and information set out in Para A of Part A of Schedule III of the Regulations, as and when they take place in the Company. Further, in respect of events and information set out in Para B of Part A of Schedule III of the Regulations, the Company has to frame a policy for determining materiality of event/information for disclosure to the Stock Exchanges.

Pursuant to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, issued on September 2, 2015, the Board of Directors approved the "Policy for Determination of Materiality of Events or Information". The Board shall review, and if found required, may amend this Policy from time to time.

This Policy will be applicable to the Company effective December 1, 2015.

### **2. OBJECTIVE:**

The objective of this policy is therefore to define the events/information to be disclosed to Stock Exchanges; to lay down criteria for identification/determination of material events/information and designate persons authorized to determine materiality and disclosure.

### **3. DEFINITIONS:**

- i) "Act" means the Companies Act, 2013 (and the Rules) and the Companies Act, 1956 to the extent applicable.
  - ii) "Board of Directors" means the Board of Directors of the Company.
  - (iii) "Company" means COROMANDEL AGRO PRODUCTS AND OILS LIMITED.
  - (iv) "Key Managerial Personnel" means key managerial personnel as defined under sub-section (51) of section 2 of the Companies Act, 2013.
  - (v) "Listing Regulations" means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- "Policy" means this policy, as amended from time to time.
- (vi) "SEBI" means the Securities and Exchange Board of India.
  - (vii) "Rules" means the rules made under the Companies Act, 2013.
  - (viii) "Stock Exchange(s)" means BSE Limited where the equity shares of the Company are listed.

### **4. EVENTS/INFORMATION DEEMED TO BE MATERIAL:**

Para A of Part A of Schedule III of the Regulations prescribes list of events/information, which are deemed material and as and when such events/information takes place, Company shall promptly disclose the same to the Stock Exchanges within the prescribed time.

## **5. EVENTS/INFORMATION FOR WHICH MATERIALITY TO BE DETERMINED:**

Para B of Part A of Schedule III of the Regulations prescribes list of events/information which shall be disclosed upon application of criteria for determination of materiality as laid down in Regulation 30 (4) and reproduced below:

### **GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION:**

Qualitative criteria would mean an event/ information:

- (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; or
- (c) In case where the criteria specified in (a) or (b) above are not applicable, any other event/information may be treated as being material if in the opinion of the Board of Directors of Company, the event / information is considered material.

Quantitative criteria would mean an event/ information:

Taking into consideration above requirements, Company will consider any event/information material for disclosure to the Stock Exchanges, if such event/information is likely to have impact of more than 25% of company's revenue or profit, based on consolidated audited financial statements of previous financial year.

## **6. PERSONS AUTHORISED TO DETERMINE MATERIALITY:**

The Board of Directors of the Company have authorized the Managing Director/ Whole Time Director and CFO will determine the materiality of event or information that has taken place, and for the purpose of making disclosure to the Stock Exchanges the Company Secretary or the Managing Director is authorized to do so.

## **7. REVIEW AND AMENDMENT:**

The Board may monitor, review and amend the Policy from time to time as also whenever necessitated due to amendments in the Regulations.

