



**Policy on criteria for determining
materiality of events information
Of
Alliance Integrated Metaliks Limited**

POLICY ON CRITERIA FOR DETERMINING MATERIALITY OF EVENTS INFORMATION

OBJECTIVE

The Policy is framed in accordance with the requirements of the Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations).

Pursuant to the SEBI Listing Regulations, the Company is under an obligation to make disclosure of any events or information which, in the opinion of the Board of Directors is material. The objective of this Policy is therefore to lay down the criteria for determination of materiality of events and information that need to be disclosed to the Stock Exchanges in a timely manner and other matters related thereto.

DEFINITIONS

“**Act**” shall mean the Companies Act, 2013 and the rules framed there under, including any modifications, clarifications, circulars or re-enactment thereof.

“**Board of Directors**” or “**Board**” means the Board of Directors of the Company, as constituted from time to time.

“**Company**” means Alliance Integrated Metaliks Limited

“**Key Managerial Personnel**” means Key Managerial Personnel as defined in subsection (51) of section 2 of the Companies Act, 2013;

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

“**Schedule**” means a Schedule III of the SEBI Listing Regulations.

“**Material Event**” or “**Material Information**” shall mean such event or information determined in terms of the SEBI Listing Regulations as amended read with all circulars and clarifications issued thereunder. In this Policy, the words, “material” and “materiality” shall be construed accordingly.

“**SEBI**” means the Securities and Exchange Board of India.

Any other term not defined herein shall have the same meaning as defined in the Act the SEBI Listing Regulations or any other applicable law or regulation to the extent applicable to the Company.

AUTHORIZATION FOR DETERMINING MATERIALITY

The Board of Directors of the Company has severally authorized wholtime director, company secretary and chief financial officer (“**CFO**”) to determine Materiality of event or information that has taken place, for the purpose of making adequate disclosure to the Stock Exchanges.

The materiality of the event or information will be decided in consultation with Business Heads, Plant Heads, Project Heads and Senior Management Personnel or persons connected with the event or information.

The contact details of the wholetime director, company secretary and CFO to be disclosed to the Stock Exchanges and be posted on the Company's website.

EVENTS DEEMED TO BE MATERIAL EVENTS

Events or information specified in Para A of Part A of Schedule III of the Listing Regulations are required to be disclosed irrespective of application of any quantitative or qualitative materiality thresholds as these are "deemed " to be material.

GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION

Following are the criteria which shall be applied to determine Materiality for the purpose of making disclosure in terms of the SEBI Listing Regulations:

- (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 listed entity, the event / information is considered material.

DISCLOSURE OF EVENTS OR INFORMATION

Event specified in SEBI(Listing Obligation and Disclosure Requirements) Regulation, 2015 are deemed to be material event and Company shall make disclosure of material events as soon as reasonably possible and not later than twenty-four (24) hours from the occurrence of such event or information in the following manner:

- a. inform the stock exchanges on which the securities of the Company are listed; and
- b. upload on the website of the Company

Provided that in case the disclosure is made after twenty-four (24) hours of occurrence of such event or information, the Company shall, along with such disclosure(s), try to provide an explanation for delay. Provided further that disclosure with respect to events specified in Clause 4 of Para A of Part A of Schedule III of the Listing Regulations shall be made within thirty minute of the conclusion of the Board meeting.

The Company shall make disclosures updating Material Events or Material Information on a regular basis, until such time the event is resolved/closed, with relevant explanations

The Company shall disclose all events or information with respect to its material subsidiaries, which are material for listed entity.

The Company shall provide specific and adequate reply to all queries raised by Stock Exchange(s) with respect to any events or information . Further it shall confirm or deny any event or information to Stock Exchange(s) reported in the media.

The Company may on its own initiative also, confirm or deny any reported event or information to Stock Exchange(s).

In case where an event occurs or information is available with the Company, which has not been indicated in Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, but which may have material effect on it, the Company will make adequate disclosures in regard thereof.

All the above disclosures would be hosted on the website of the Company for a minimum period of five years and thereafter as per archival policy of the Company.

SCOPE AND LIMITATION

In the event of any conflict between the provisions of this Policy and the Listing Regulations, Companies Act, 2013 or any other statutory enactments, rules, the provisions of such Listing Agreement/Companies Act, 2013; Regulations 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.

DISSEMINATION OF POLICY

This Policy shall be hosted on the website of the Company and address of such web link thereto shall be provided in the Annual Report of the Company.

POLICY REVIEW

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.