

**IMPAL Policy for Determination of Materiality of Events/Information
(Pursuant to Regulation 30 (4)(ii) of the SEBI (Listing Obligations and
Disclosure Requirements) Regulations, 2015)**

The Policy is being framed in compliance with Regulation 30(4) (iii) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the New Regulations).

The IMPAL Policy (the Policy) for Determination of Materiality of Events / Information shall come into effect from the date it is approved by the Board of Directors.

This Policy for determination of materiality of events/information is framed, based on the following criteria:

The omission of an event or information, which is likely to result in

- a) discontinuity or alteration of an event or information already available in the publicly; or
- b) significant market reaction, if the said omission came to light at a later date.

The Policy shall be applied to determine the materiality in respect of the following types of event/information, as laid down under Part B of Part A of Schedule III.

Events which shall be disclosed upon application of the guidelines for materiality referred sub-regulation (4) of regulation (30):

1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2. Any of the following change in the general character or nature of business pertaining to the listed entity:
 - (a) arrangements for strategic, technical, manufacturing, or marketing tie-up; or
 - (b) adoption of new line(s) of business or
 - (c) closure of operations of any unit/division or **subsidiary** (in entirety or in piecemeal)
3. Capacity addition or product launch
4. Awarding, bagging/receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
5. Agreements (viz loan agreement(s) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendments or termination(s) thereof.
6. Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.) force majeure or events such as strikes, lockouts etc.

7. Effect(s) arising out of change in the regulatory framework applicable to the listed entity.
8. Pending of any litigation(s)/dispute(s) or the outcome thereof which may have an impact on the listed entity.
9. Fraud or defaults by employees of the listed entity which has or may have an impact on the listed entity.
10. Giving of guarantees or indemnity or becoming a surety for any third party.
11. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
12. Option to purchase securities including any ESOP/ESPS Scheme
13. Delay or default in payment of fines, penalties, dues etc. to any regulatory statutory, enforcement or judicial authority.

Explanation: An event / information under the above points 1 to 13 shall be considered as 'material' if the value involved therein exceeds the lower of the following;

- a) 2% of turnover, as per the last audited consolidated financial statement of the Company;
- b) 2% of the net worth, as per the last audited consolidated financial statement of the Company, except in case the arithmetic value of the net worth is negative;
- c) 5% of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statement of the Company.

In cases where the Criteria laid down under the Policy are not directly applicable, an event/information shall be treated as being material, if, in the opinion of the Board of Directors, the said event/information is considered material.

Authorisation for determination of Materiality of events or transaction or information
Managing Director shall be the authority entitled to take a view on the materiality of an event that qualifies for disclosure and the Key Managerial Personnel (KMP) shall disclose the said information to the Stock Exchange.

Power of the Board of Directors

Managing Director subject to the approval of Board of Directors reserves the right to amend or modify this Policy at any time.

