

Document Title	POLICY ON DETERMINATION AND DISCLOSURE OF MATERIALITY OF EVENTS AND INFORMATION (MOE)
Document Number	P15
Approval Authority / Date	Board of Directors
Applicable from	07/11/2015

**POLICY ON DETERMINATION AND DISCLOSURE OF MATERIALITY OF
EVENTS AND INFORMATION**

1. Short title, commencement and objective

This Policy has been framed in accordance with the requirements of the Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Regulations”). The objective of this Policy is to determine materiality of events or information related to the Company and to ensure that such information is adequately disseminated in pursuance with the Regulations and to provide an overall governance framework for such determination of materiality.

2. Definitions

For the purpose of this Policy, the following words will carry the meaning as under:

- (1) “**Act**” The Act means Companies Act, 2013 and the rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof

- (2) **“Board”** means the Board of Directors of Insecticides (India) Limited
- (3) **“Company”** means Insecticides (India) Limited or IIL
- (4) **“Key Managerial Personnel”** shall mean the key managerial personnel as defined under sub-section (51) of Section 2 of the Companies Act, 2013;
- (5) **“Listing Agreement”** shall mean an agreement that is to be entered into between the Company and the Stock Exchanges where the securities of the Company are listed pursuant to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (6) **“Material Event”** or “Material Information” shall mean such event or information as set out in the Schedule or as may be determined in terms of Clause 3 of this Policy. In this Policy, the words, “material” and “materiality” shall be construed accordingly;
- “Policy” shall mean this Policy on criteria for determining Materiality of events or information and as may be amended from time to time;
- (7) **“Regulations”** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof;
- (8) **“Schedule”** shall mean Schedule III or any other schedule of the Regulations.

Any other term not defined herein shall have the same meaning as defined under the Companies Act, 2013, the Listing Agreement, Regulations or any other applicable law or regulation to the extent applicable to the Company.

3. **Determination of materiality of event or information**

- a. The events or information specified in Para A of Part A of Schedule III of SEBI LODR will be considered as deemed material events and thus will be disclosed to the Stock Exchanges without application of the materiality criteria.
- b. The events or information specified in Para B of Part A of Schedule III of SEBI LODR will be disclosed based on application of the materiality criteria.
- c. In addition to the above, Para C and Para D of Schedule III of SEBI LODR requires the disclosure of the following:
 - i. Major development that is likely to affect business, e.g. emergence of new technologies;
 - ii. Expiry of patents;
 - iii. any change of accounting policy that may have a significant impact on the accounts, etc.;
 - iv. any other information which is exclusively known to the Company and which may be necessary to enable the holders of the securities of the Company to appraise its position and avoid establishment of any false market in such securities; and
 - v. Any other disclosure as may be specified by SEBI from time to time.
- d. In case an event occurs, or information is available with the Company, which is not included in the PARA A or PARA B of PART A of Schedule III, but which may have a material effect, the Company shall make adequate disclosures in this regard thereof.

4. Authority to make disclosures

- a. As per SEBI LODR, the Board of directors has authorized the following persons:

- i. Any Executive Director;
- ii. Chief Financial Officer;
- iii. Company Secretary

to determine materiality of an event or information in terms of this policy and to make appropriate disclosure to the stock exchanges.

- b. The contact details of the aforesaid authorized personnel will be disclosed to the stock exchanges and displayed on the Company's website.
- c. The authorized personnel shall ensure the following:
 - i. Determine the materiality of an event or information for the purpose of making disclosures to Stock Exchanges.
 - ii. Give specific and adequate reply to all queries raised by the stock exchanges with respect to any event or information.
 - iii. Voluntarily confirm or deny any reported event or information to stock exchanges.
 - iv. In case of an ongoing material event or information, make disclosures updating material development on a regular basis, till such time an event is resolved or closed, with relevant explanations.

5. Disclosure Of Events or Information

- a. The disclosures of all events or information as specified in SUB PARA 4 of PARA A of PART A of Schedule III of SEBI LODR will be made to the stock exchanges within thirty (30) minutes of the conclusion of the meeting of the Board of Directors.
- b. All other disclosures of events or information will be made as soon as reasonably possible and not later than twenty-four hours (24 hours) of

occurrence of the event of information. Provided that in case the disclosure is made after twenty-four (24) hours of occurrence of the event or information, the company will make such disclosures along with an explanation for such delay.

- c. The Company shall also disclose all events or information with respect to its material subsidiaries as per the Policy on Material Subsidiary.

6. *Revision and Amendments*

The Board reserve the right to amend or modify this Policy in whole or part, in accordance with any regulatory amendment or notification or otherwise, at any time without assigning any reason whatsoever. Any such amended Policy will be updated on the website of the Company.

The Board hereby authorize the Company Secretary to amend the Policy for any statutory amendment / modification.

List of Approval and Amendments

<i>Approval and Amended By</i>	<i>Meeting date</i>
<i>Board of Directors</i>	<i>10/08/2023</i>