



MODERN INDIA LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF AN EVENT OR INFORMATION

REGULATORY FRAMEWORK

This policy (“**Policy**”) of Modern India Limited (“**Company**”) has been prepared and adopted in accordance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI LODR**”) read with SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018 and Companies Act, 2013 (“**Act**”) read with the Companies (Amendment) Act, 2017 alongwith circulars issued thereunder, including any statutory modifications or re-enactments thereof for the time being in force.

Regulation 30(1) of SEBI LODR requires the Company to make disclosures to the stock exchanges of any events or information which, in the opinion of the board of directors of the Company, is material.

Regulation 30(4) of SEBI LODR requires the Company to frame a policy for determination of materiality of events or information for onward disclosure to stock exchanges based on the materiality criteria as specified in the said regulation and reiterated in this policy.

The Board of Directors shall review the Policy periodically and may amend the same from time to time, as may be deemed necessary.

OBJECTIVES OF THIS POLICY

To determine the materiality of an event or information;

To ensure timely, accurate, uniform and transparent disclosure of all such events or information considered material as per this policy.

3. Authorized Persons

1. The materiality or otherwise, of an information or event in terms of the Listing Regulations will be determined by following Key Managerial Personnel of the Company in consultation with the concerned Department head, or the Vice President as the case may be as under

Shri Vijay Kumar Jatia, Chairman & Managing Director

Shri N K Deora, Sr Vice President and Chief Financial Officer

Shri Parind Badshah, Vice President & Company Secretary

OR

1. The materiality or otherwise, of an information or event in terms of the Listing Regulations will be determined by the committee comprising of Shri Vijay Kumar Jatia, Chairman & Managing Director, Shri Mudit Jatia, President, Shri Sidhant Jatia, President, Shri N. K Deora, Sr. Vice President & Chief Financial Officer and Shri Parind Badshah, Vice President & Company Secretary of the Company constituted under the Chairmanship of Shri Vijay Kumar Jatia, Chairman & Managing Director
2. The authorized persons will also decide the appropriate period / stage at which disclosure is to be filed with the stock exchanges and details that may be filed.



MATERIALITY CRITERIA

The Company shall consider the events or information as material (“**materiality criteria**”) based on following criteria:

- The omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
- 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;
- In case where the criteria specified in clause 3.1 & 3.2 are not applicable, an event or information may be treated as being material if the impact or the value involved is more than Rs. 100 crores.

DETERMINATION OF MATERIALITY OF EVENT OR INFORMATION

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.

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.

In addition to the above, Para C and Para D of Schedule III of SEBI LODR requires the disclosure of the following:

- a) Major development that is likely to affect business, e.g. emergence of new technologies;
- b) Expiry of patents;
- c) any change of accounting policy that may have a significant impact on the accounts, etc.;
- d) 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



e) Any other disclosure as may be specified by SEBI from time to time.

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.

DISCLOSURE OF EVENTS OR INFORMATION

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.

All other disclosures of events or information will be made as soon as reasonably possible as 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.

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

The policy shall be disclosed on the website of the Company i.e. www.modernindia.co.in