



AGRO PHOS (INDIA) LIMITED

CIN: L24123MP2002PLC015285

POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURES

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1. BACKGROUND

Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as “SEBI (LODR) Regulations”] mandates that every listed entity shall make disclosures of any events or information which, in the opinion of the Board of Directors of the listed company, is material as well as any price sensitive information. The listed entity shall frame a policy for determination of materiality, based on the specified criteria duly approved by its Board of Directors, which shall be disclosed on its website.

2. DEFINATION

I. BOARD OF DIRECTORS

Board of Directors shall mean Board of Directors of Agro Phos (India) Limited.

II. AUTHORIZED KEY MANAGERIAL PERSONNEL:

Authorised Key Managerial Personnel means Managing Director, who is authorized, for determining the materiality of an event or information that qualifies for disclosure and to decide the appropriate time and details of its disclosure to be made to the Stock Exchange(s). he is also empowered to seek appropriate counsel or guidance, as and when necessary, from other internal or External persons as he may deem fit.

III. POLICY

Policy means “Policy on Determination of Materiality for Disclosure” of Agro Phos (India) Limited.

IV. STOCK EXCHANGE

Stock exchange means all the Exchanges where security of the company is Listed.

Terms that have not been defined in this policy shall have the same meaning assigned to them in the SEBI (LODR) Regulations, SEBI Act 1992, Securities Contract (Regulation) Act 1956, Depositories Act 1996, Companies Act 2013 and/or the Rules & Regulations made there under as amended from time to time.

3. OBJECTIVE OF THE POLICY:

- I.** To ensure that company complies with the disclosure obligations as laid down by the SEBI (Listing Obligation and Disclosure Requirement), Regulations 2015, Various Securities Laws and any other legislation.
- II.** To ensure that the corporate documents and public statements are accurate and do not contain any misrepresentation.
- III.** To look out the confidentiality of price Sensitive information's within the context of company's Disclosure obligation
- IV.** To provide a framework that supports and Fosters confidence in the quality and integrity of information released by the company.

4. REPORTING AND DISCLOSURE

Regulations 30 of SEBI [LODR] Regulations, 2015, have categorized material events and information which will have bearing on the performance/operations of the Company. The disclosures of events and information which the Company shall make to the Stock Exchange(s) as broadly categorized under these regulations are as under.

- I.** Events in category A shall be disclosed to Stock Exchanges without any application of the guidelines for materiality i.e. these are mandatorily to be disclosed irrespective of the extent of happening of event.
- II.** Events that have been provided in category B shall be disclosed to Stock Exchanges upon application of the guidelines for materiality on the basis of criteria as mentioned in Regulation 30(4).
- III.** Any other material event or information as per Category C, which have not been covered under Category A & Category B, shall also be disclosed to the Stock Exchanges upon application of guidelines for materiality to be determined by the Authorized Key Managerial Personnel on the basis of criteria as mentioned in Regulation 30(4).
- IV.** Any other events or information's as the Authorized Key Managerial Personnel deem it fit to be Material.

5. GUIDENCE FOR DETERMINING MATARIALTY OF EVENTS /INFORMATIONS

The Materiality of an Event or information will be determined on case to case basis depending the facts and circumstances pertaining to the particular Event or Information however apart

from the events and Information's as mentioned under Category A and B, the other events or Information's will be Material or not will be depends on

- I. The omission of and event or Information which is likely to
 - result in discontinuity or alteration of event or information already available publicly; or
 - result in significant market reaction if the said omission came to light at a Later date
- II. In the opinion of the Board of Directors of the Company, the event or information is considered material and ought to be disclosed.

6. IMPLEMENTATION

The Company will adhere to highest standards with regard to the implementation of this policy. The Managing Director of the Company shall have overall responsibility for implementing of this policy and shall take internal/external approvals, wherever necessary.

7. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains competent with applicable legal requirements and the Material changes to the policy will need approval of the Board of Directors.

8. DISCLOSURE OF POLICY

The Policy will be Displayed on the website of the company as per the SEBI(Listing and Obligation of Disclosure Requirement), Regulations,2015.
