



**NITTA GELATIN INDIA LIMITED**  
**POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS AND**  
**INFORMATION**

**OBJECTIVE AND PURPOSE OF POLICY**

Nitta Gelatin India Limited (the Company) stands committed to adherence of disclosure requirements and obligations relating thereto specified by SEBI (Listing Obligations and Disclosure Requirements) Regulations ("Listing Regulations"). The Board of Directors of the Company believes in total transparency in the matter of disclosures as required under the Listing Regulations including material events as and when they occur.

This policy aims to ensure that all the information which are necessary for the stakeholders to assess the Company's performance including financial matters are disclosed to public on a timely basis.

**DISCLOSURE OF INFORMATION**

Events or information specified in Para A of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed without any application of the guidelines for materiality.

Events or information specified in Para B of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed based on application of materiality criteria.

The disclosure shall be made to the Stock Exchange by adhering to the timelines as mandated by the Securities and Exchange Board of India (SEBI), in applicable cases.

**PERSONS RESPONSIBLE FOR DISCLOSURE**

The Board of Directors of the Company have authorized the Managing Director and Company Secretary to determine the materiality of an event or information and to make appropriate disclosure on a timely basis. They are also empowered to seek appropriate counsel or guidance, as and when necessary, from other internal or external stakeholders as they may deem fit.



## **GUIDELINES FOR ASSESSING MATERIALITY**

Materiality will be determined on a case to case basis depending on the facts and the circumstances pertaining to the event or information.

The following criteria will be applicable for determining materiality of event or information:

- a. The omission of an event or information which is likely to:
  - i. result in a discontinuity or alteration of an event or information already available publicly; or
  - ii. result in significant market reaction if the said omission came to light at a later date;
- b. The omission of an event or information, whose value or the expected impact in terms of value exceeds the lower of the following:
  - i. two percent of turnover, as per the last audited consolidated financial Statements of the Company; or
  - ii. two percent of net worth, except in case of the arithmetic value of the networth is negative, as per the last audited consolidated financial statements of the Company;
  - iii. five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company

Accordingly, any transactions exceeding the lower of i, ii or iii above, with an annual impact in value, will be considered for the above purposes.

- c. In the opinion of the Board of Directors of the Company, the event/information ought to be disclosed.

## **GUIDANCE ON TIMING OF AN EVENT OR INFORMATION**

The Company may be confronted with the question as to when an event/ information can be said to have occurred.

In certain instances, the answer to the above question would depend upon the stage of discussion, negotiation or approval and in other instances where there is no such discussion, negotiation or approval required, viz. in case of natural calamities, disruptions etc., the answer to the above question would depend upon the timing when the Company became aware of the event/ information.



In the former, the events/ information can be said to have occurred upon receipt of approval of Board of Directors.

However, considering the price sensitivity involved, for certain events, e.g. Decision on declaration of dividends etc., disclosure shall be made on receipt of approval of the event by the Board of Directors, pending Shareholders' approval.

In the latter, the events/ information can be said to have occurred when the Company becomes aware of the events/ information, or as soon as, an officer of the Company has, or ought to have reasonably come into possession of the information in the course of the performance of his duties.

Here, the term 'officer' shall have the same meaning as defined under the Companies Act, 2013.

#### **OBLIGATIONS OF INTERNAL STAKEHOLDERS AND KMPs FOR DISCLOSURE**

- a. Any event or information, including the information specified in Para A and Para B of Part A of Schedule III of the SEBI Listing Regulations shall be forthwith informed to the Managing Director and Company Secretary, upon occurrence, with adequate supporting data/information, to facilitate a prompt and appropriate disclosure to the Stock Exchange.
- b. They will then ascertain the materiality of such event(s) or information based on the above guidelines.
- c. On completion of the assessment, they shall, if required, make appropriate disclosure(s) to the Stock Exchange.

#### **POLICY REVIEW**

The Managing Director and Company Secretary may review the Policy from time to time. Material Changes to the Policy will need the approval of the Board of Directors. Any subsequent amendment/ modification in the Listing Regulations, ACT and/or applicable laws in this regard shall automatically apply to this Policy.

#### **EFFECTIVE DATE**

The amended Policy, shall be effective from 4<sup>th</sup> August, 2023.

#### **WEBSITE**

As per the provisions of the SEBI Listing Regulations, the Policy shall be disclosed on the website of the Company.



## **CONTACT DETAILS**

Any question or clarifications about the policy or disclosures made by the Company should be referred to the following address:

Company Secretary,

Nitta Gelatin India Limited,

56/715,

SBT Avenue,

Panampilly Nagar

Kochi, Kerala - 682036.