

## **POLICY ON DETERMINING MATERIAL EVENTS OR INFORMATION**

This Policy on determining of Material Events or Information was adopted by the Board of Directors of RRIL Limited (Formerly known as S R K Industries Limited) on March 31, 2021 and shall be applicable with effect from that date.

### **A. INTRODUCTION**

Equity shares of RRIL Limited (Formerly known as S R K Industries Limited) (the “Company” or “RRIL”) are traded in India on the BSE Limited.

The requirements under the Securities and Exchange Board of India Regulations, (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (Listing Regulations), have been considered while drafting this Policy for determining Materiality for Disclosures (the “Policy”)

The Policy applies in respect of disclosure of material events occurring within RRIL.

### **B. OBJECTIVE**

This Policy is framed in accordance with the requirements of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. The objective of this Policy is to determine materiality of events or information relating to the Company and to ensure that such information is disseminated in accordance with the Regulations to enable investors to be updated with changes relating to the Company to take well-informed investment decisions.

### **C. AUTHORISED PERSONS**

The Company Secretary will be the custodian of the disclosure process.

The Company's Key Managerial Personnel shall have the authority to make determination of materiality and distribution covered by this Policy with respect to the information disclosed about the Company. The Key Managerial Personnel or his / her designee, in each case, pre-approve in consultation with MD and CFO any deviation from the policies and procedures outlined in this Policy.

The Company Secretary will be the single point of contact for the above signatories who are authorized to determine materiality and make distributions covered by this Policy. The contact details of the Company Secretary are: -Sanjay Vishwakarma, Company Secretary, Email:- [office@rrillimited.com](mailto:office@rrillimited.com) and telephone:- 022-28959644.

#### **D. CRITERIA FOR DETERMINATION OF MATERIALITY**

Materiality must be determined on a case to case basis depending on the material facts and circumstances pertaining to the information or event. The Company shall consider the following criteria for determination of materiality of events/ information which is subject to the Quantitative factor mentioned below:

- a. the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
- b. 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;
- c. any event or information having a significant risk to the reputation of the Company;
- d. in case where the criteria specified in (a), (b) and (c) are not applicable, an event/information may be treated as being material if in the opinion of the board of directors of Company, the event/information is considered material.

#### **E. QUANTITATIVE FACTOR FOR DETERMINING MATERIALITY**

A transaction is considered to be material if it is more than or equal to 10% of the annual consolidated turnover or 10% of the total networth whichever is higher.

#### **F. DISCLOSURE OF EVENTS OR INFORMATION**

The Company shall make disclosures of any events or information which in the opinion of the board of directors is material or required under the SEBI LODR Regulations. The Company will also disclose to the Stock Exchanges, with respect of its Subsidiaries, events and information which are material for the Company.

#### **G. DISCLOSURE OF THE POLICY**

This Policy will be uploaded on the website of the Company.

#### **H. EVENTS / INFORMATION WITH RESPECT TO SUBSIDIARIES**

The Company shall disclose all events or information with respect to subsidiaries which are material for the Company.

#### **I. LIMITATION AND AMENDMENT**

In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this Policy. Any subsequent

amendment/modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.

**For RRIL Limited**

**Sd/-**  
**Ratanchand D. Jain**  
**Managing Director**