

Maan Aluminium Limited

Policy for Determining Materiality for Disclosures

I. Introduction

Equity Shares of Maan Aluminium Limited (“the Company”) are traded on the Bombay Stock Exchange and the National Stock Exchange. Regulation 30 of the Securities and Exchange of Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 mandates every listed entity to formulate a Policy for determining materiality of events or information that warrants disclosures to the investors. It is in this context that the Policy on Determination of Materiality for Disclosures (“Policy”) is being framed and implemented.

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

II. Objective:

The objective of the Policy is to determine materiality of events or information of the Company and disclosure of events or information to Stock Exchanges in compliance with the SEBI Listing Regulations and to ensure good corporate governance.

III. Applicability:

This policy has been effective w.e.f July 31, 2020 and shall not be applicable to the past events.

IV. Definitions

In this policy, unless context otherwise requires:

- a) ‘**Board of Directors**’ or the ‘Board’ shall mean the Board of Director of the Company.
- b) “**Promoter**” and “Promoter Group” shall have the same meaning as assigned to them respectively in clauses (za) and (zb) of sub-regulation (1) of regulation 2 of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009.
- c) “**Key Managerial Personnel**” means Managing Director, Chief Executive Director or Manager, in his absence, a Whole Time Director, Company Secretary of the Company and Chief Financial Officer of the Company.

V. Authorised Persons

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

Anu Aggarwal, Company Secretary, Email: secretarial@maanaluminium.in, Ph. No. 9910347840

Board of Directors, CEO, CFO, Key Managerial Personnel, Subsidiary and all other words not defined herein shall have the same meaning as assigned to those terms under the Listing Regulations, Companies Act, 2013 or any other applicable laws or regulations, as the case may be.

VI. Materiality Assessment

Information should be regarded as “material” if there is a substantial likelihood that a reasonable investor would consider such information important in making a decision to buy, sell, or hold a security or where such information is likely to have a significant effect on the market price of the security. Either positive or negative information may be material.

Materiality must be determined on a case to case basis depending on specific facts and circumstances relating to the information/event. Examples of information that would normally be regarded as “material” include the following, although the list is not exhaustive:

- ✚ Financial performance, financial condition, projections or forecasts;
- ✚ Known but unannounced future earnings or losses;
- ✚ Significant corporate events, such as a pending or proposed acquisition or joint venture;
- ✚ Plans to launch new products or product defects that have significant impact;
- ✚ Significant developments involving business relationships with customers, suppliers or other business partners;
- ✚ Changes in auditors as per statutory requirement or otherwise or auditor notification that the issuer may no longer rely on an audit report;
- ✚ Events regarding the Company's securities (such as repurchase plans, stock splits or changes in dividends, changes to the rights of security holders, public or private sales of additional securities or information related to any additional funding);
- ✚ Bankruptcies, receiverships or financial liquidity problems;
- ✚ Positive or negative developments in outstanding litigation, investigations or regulatory matters with significant impact on financial results;
- ✚ Any changes to the Company's Board of Directors or the Company's key managerial personnel and key agreements with them;

- ✚ Any significant changes to the Company's capital structure

For the avoidance of doubt, events listed in Schedule III, Part A of Listing Regulations shall be disclosed without application of the criteria listed below.

For the purpose of assessing whether a particular transaction or the amounts involved in that transaction are "material" the following information will also be considered, although the list is not exhaustive:

- ✚ The consideration involved in the transaction as a percentage of Maan annual revenue;
- ✚ The consideration involved in the transaction as a percentage of Maan fixed assets and as a percentage of Maan total assets;
- ✚ Whether the transaction is in the ordinary course of business;
- ✚ Whether a related party is involved in the transaction;
- ✚ Whether the transaction is an exit from, or entry into, a significant line of business
- ✚ Other qualitative factors relevant to a transaction.

VII. Disclosure of the Policy

As per the SEBI Regulations, this policy shall be disclosed on the website of the Company.

VIII. Policy Review:

The KMP's may review the policy from time to time. Material Changes to the policy will require the approval of the Board of Directors.

IX. 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.