

ISMT LIMITED

POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURES OF EVENTS AND INFORMATION'S AND ARCHIVAL POLICY

1. PREAMBLE

ISMT Limited ("Company") seeks to formulate a Policy on Determination of Materiality for Disclosures of material events & information to Stock Exchanges where the equity shares of the Company are listed.

The Board of Directors of the Company have adopted this Policy in compliance with Regulation 30(4)(ii) of the SEBI (LODR) Regulations, 2015 ("Listing Regulations").

2. MATERIALITY GUIDELINES

The Company shall make disclosure of events specified in Clause 5(B) to this Policy where the value involved or the impact exceeds higher of the below:

- a. 10% of total income of the Company as per the audited financial statements of the preceding financial year; or
- b. 20% of Profit/ Loss after tax of the Company as per audited financial statements of the preceding financial year.

3. PERSONS RESPONSIBLE FOR DISCLOSURE

The Board of Directors of the Company have authorised Whole-time Director and Company Secretary to determine the materiality of an event or information and to make disclosure to stock exchange.

4. ARCHIVAL POLICY

All disclosures made by the Company to the stock exchange, under Regulation 30 of the Listing Regulations shall be hosted on the website of the Company for 5 years.

5. REQUIREMENT OF DISCLOSURE OF EVENTS OR INFORMATION

- A. The events specified in Para A of Part A of Schedule III of the Listing Regulations are deemed to be material events and the Company shall make disclosure of such events to the stock exchange;
- B. The events specified in Para B of Part A of Schedule III of the Listing Regulations are to be disclosed based on Materiality Guidelines listed in this Policy. Following are some of the examples of such events/ information:
 - i. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/ division;
 - ii. Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/ division (entirety or piecemeal);
 - iii. Capacity addition or product launch;
 - iv. Disruption of operations of any one or more units or division of the Company due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.;
 - v. Any other information/ event viz. major development likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. & brief details thereof & any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position & avoid the establishment of a false market in such securities.
- C. Any other event/ information shall be treated as material if in the opinion of the Board of Directors of the Company the event/ information is considered material and the Company shall make disclosure of such event/ information to the stock exchange(s).