

Policy on Determination of Materiality of Events and Information

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Introduction:

Regulation 30(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 (the Regulations) requires every listed company to frame a policy for determination of materiality of events and information that requires appropriate disclosure to the stock exchanges.

Scope

This Policy is applicable to NCC Limited and all events or information with respect to subsidiaries which are material to NCC Limited .

Criteria for Materiality

Materiality of event or information in a particular circumstance is a matter of informed judgement. In order to frame a policy for determination of materiality of events or information, the following criteria as stated in Regulation 30(4) of the Regulations is to be considered;

- (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) In case where the criteria specified in sub clause (a) and (b) above are not applicable, an event / information may be treated as being material if in the opinion of the Board of Directors of the Company, the event is considered material

Policy

The Regulations further provide that the Board of Directors of the Company shall authorise one or more Key Managerial Personnel for the purpose of determining materiality of an event or information and for the purpose of making disclosure to the stock exchanges based on this policy.

An event or information falling under Para A Part A of Schedule III of the Regulations, shall be disclosed without any application of the guidelines for materiality as specified in Regulation 30(4).

An event or information falling under Para B Part A of Schedule III of the Regulations is considered to be material on the basis of quantity, if it is likely to affect the total income or net worth of the Company by 10%, as per the consolidated audited financial statement of the previous year.

In cases where the materiality of event or information cannot be determined on the basis of

quantitative threshold given above, Key Managerial Personnel authorised by the Board of Directors shall determine the materiality of the event or information, in consultation with the Managing Director and / or the Executive Director of the Company.

Key Managerial Personnel authorised by the Board of Directors shall ensure that updated disclosure with respect to the material event is made to the stock exchanges on a regular basis till such time the event is resolved / closed, with relevant explanation.

The event or information disclosed to the stock exchanges under this Policy shall also be placed on the website of the Company.

This Policy also applies to the event or information with respect to subsidiaries which are material for the Company. The subsidiaries which are material for the Company will have same meaning as applicable to material subsidiaries as defined under the Regulations.

Amendments in Law

Any subsequent amendment / modification to the Listing Regulations and / or other applicable laws in this regard shall automatically apply to this Policy.

Disclosure

This Policy shall be placed on the website of the Company.