



**POLICY FOR DETERMINATION AND DISCLOSURE OF
MATERIAL EVENT/INFORMATION**

Policy Adopted on December 19, 2018 | Last amended on August 11, 2023

Version 3.0

Content

1. Preamble
2. Objective
3. Definitions
4. Criteria for Determination of Materiality of Event or Information
5. Disclosure of Material Events or Information
6. Responsibility for Determination of Materiality of Event or Information
7. Policy Review
8. Interpretation
9. Disclosure

1. Preamble

The Policy for Determination and Disclosure of Material Events/Information is framed by the Antony Waste Handling Cell Limited in pursuance of Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

2. Objective

The primary objectives of this Policy are as under:

- i. To determine the materiality and disclosure of events and information based on criteria specified under clause (i) of sub-regulation (4) of Regulation 30 of the Listing Regulations;
- ii. To ensure prompt disclosure of material price sensitive information/event to the stock exchange(s), where the securities of the Company are listed, to promote Investor Confidence in the integrity of the Company and its securities; and
- iii. To provide Shareholders, Investors and the market with timely, direct and equal access to material information generated by the Company to avoid establishment of false market in the securities of the Company.

3. Definitions

- a) **“Act or the Act”** means the Companies Act, 2013, as amended from time to time.
- b) **“Board of Directors”** or **“Board”** means the Board of Directors of Antony Waste Handling Cell Limited, as constituted from time to time.
- c) **“the Company”** means Antony Waste Handling Cell Limited.
- d) **“Mainstream media”** shall include print or electronic mode of the following:
 - a. Newspapers registered with the Registrar of Newspapers for India;

- b. News channels permitted by Ministry of Information and Broadcasting under Government of India;
- c. Content published by the publisher of news and current affairs content as defined under the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021; and
- d. Newspapers or news channels or news and current affairs content similarly registered or permitted or regulated, as the case may be, in jurisdictions outside India;
- e) **"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof.
- f) **"Policy"** shall mean Policy for Determination and Disclosure of Material Events/ Information, as amended from time to time.
- g) Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any other applicable law or regulation, amended from time to time.

4. Criteria for Determination of Materiality of Event or Information

The Company shall apply the following guidelines for determination of Materiality of Event or Information:

- 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; or

- c) 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 listed entity;
 - ii. two percent of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;
 - 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 listed entity;
- d) In case where the criteria specified in sub-clauses (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the listed entity, the event or information is considered material:

It is clarified that as regard any event / information, only such impact which is direct and perceivable, and not remote, shall be considered.

5. Disclosure of Events or Information to the stock exchange(s):

The disclosure of Events or Information to the stock exchange(s) shall be made as follows:

- a) The events specified in Para A of Part A of Schedule III of SEBI Listing Regulations on occurrence, will be deemed to be material irrespective of their size, volume, frequency or any other criteria and without application of guidelines on materiality as specified in Clause 4 of this Policy, same be disclosed the stock exchanges where the securities of the Company are listed.

- b) The events specified in Para B of Part A of Schedule III of SEBI Listing Regulations and Events or Information with which are material for company shall be disclosed upon application of the guidelines for materiality as per clause 4 of the Policy.
- c) The events specified in Para A & B of Part A of Schedule III of SEBI Listing Regulations and Events or Information which are material for subsidiaries shall be disclosed upon application of the guidelines for materiality as per clause 4 of the Policy.
- d) Any other Information/Event viz., Major development within the Company or its subsidiaries that is 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. and brief details thereof and 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 and to avoid the establishment of a false market in such securities.

6. Time line for Disclosure of Material / Deemed to be material Events or Information

The Company shall ensure prompt disclosure of all material/ deemed to be material events/information (that are intended to be made public or are required to be made public as per statutory regulations) to the stock exchange(s), where the securities of the Company are listed, as soon as reasonably possible and in any case not later than the following:

- i. 30 (thirty) minutes from the closure of the meeting of the board of directors in which the decision pertaining to the event or information has been taken;
- ii. 12 (twelve) hours from the occurrence of the event or information, in case the event or information is emanating from within the Company;

- iii. 24 (twenty four) hours from the occurrence of the event or information, in case the event or information is not emanating from within the Company:

Provided that disclosure with respect to events for which timelines have been specified in Part A of Schedule III of the SEBI Listing Regulations shall be made within such timelines as indicated thereat:

Provided further that in case the disclosure is made after the timelines specified under this regulation, the Company shall, along with such disclosure provide the explanation for the delay.

The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this Policy, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website.

7. Responsibility for Determination of Materiality of Event or Information

Any one of Chief Financial Officer or Company Secretary and Compliance Officer of the Company shall be responsible for determining the materiality and prompt disclosure of an event and ensuring overall compliance of this Policy including the following:

- The departmental heads are responsible to report to the above listed officials about any event or information specified in Part A and Part B of Schedule III of the SEBI Listing Regulations or any significant information or event with respect to the Company and its subsidiaries.
- Thereafter, the Listed officials shall determine if the event or information required to be classified as material information and there disclosures to the stock exchanges, if required.

- They shall take care to ensure that he/she is reasonably satisfied that any event /information being published is true and correct and does not contain any misrepresentations.

Further, the contact details of above officials shall be published on the website of the Company.

8. Policy Review

The policy shall be periodically reviewed and brought in conformity with statutory and regulatory requirements, as and when required.

This Policy was approved at the Meeting of the Board of Directors held on December 19, 2018.

9. Interpretation

In any circumstance where the provisions of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the relevant law, rule, regulation or standard will take precedence over this Policy until such time as this Policy is changed to conform to the said law, rule, regulation or standard.

10. Disclosure

The Policy is disclosed on Company's website i.e. www.antony-waste.com.
