



SEAMEC LIMITED

A member of the **MMG**

**POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION
AND WEB ARCHIVAL POLICY**

Regd. & Corporate Office:

A-901-905, 9th Floor, 215 Atrium
Andheri – Kurla Road, Andheri
(East), Mumbai – 400093, India.

Tel.: +91 (22) 66941800 / 33041800

Fax: +91 (22) 66941818 / 33041818

Email: contact@seamec.in

Website:-www.seamec.in

THE POLICY APPROVED BY THE BOARD OF DIRECTORS IN THE MEETING HELD ON 6TH NOVEMBER, 2023

TABLE OF CONTENTS

Sr. No.	Details:	Page nos.
1.	Preface	3
2.	Definitions	3
3.	Interpretations	5
4.	Criteria for determining materiality of events / information	5
5.	Guidance on occurrence of event / availability of information	5
6.	Time lines for disclosure of material events/ information	5
7.	Disclosure of events / information	5
8.	Disclosure of agreements between stakeholders to which the Company may or may not be a party	13
9.	Disclosure of events/ information w.r.t. Subsidiaries	14
10.	Guidance of when an event/ information can be said to have occurred for disclosure	14
11.	Authorization for determining materiality of events and making disclosures thereof	14
12.	Website Disclosures and Archival Policy	15
13.	Amendment	15
14.	Scope and Limitation	15
15.	Dissemination of the Policy	15



1. Preface:

Regulation 30(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Regulations') requires every listed entity to frame a policy for determination of materiality of events and information that requires appropriate disclosure to the stock exchanges. Further such disclosures are required to be hosted on the website of the listed entity for a minimum period of 5 years and thereafter as per its Archival Policy.

Accordingly, Seamec Limited (the 'Company') herein sets out a Policy for determination of materiality of events and information and disclosure thereof and Web Archival Policy (hereinafter referred to the 'Policy').

This policy along with the requirements under Regulation 30 shall be disseminated amongst the employees of the Company with an intent that the relevant employees i.e. employees who would be in the knowledge of any information / event potentially requiring disclosure under Regulation 30 of the Regulations, can apprise the KMP(s) or concerned heads of departments for determination of material events from time to time for necessary actions in this regard.

The requirements of this Policy are in addition to materiality thresholds prescribed under provisions of 'Related Party Transactions', for which a separate policy is in place.

2. Definitions:

In this policy, unless the context otherwise required: -

"Audit Committee or Committee" means Audit Committee constituted by the Board of Director of the Company, from time to time under provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Companies Act, 2013.

"Board of Directors or Board" means the Board of Directors of the Company.

"Company" means Seamec Limited.

"Key Managerial Personnel" (KMP) of the Company includes Managing Director, President & Chief Financial Officer and President-Corporate Affairs, Operations & Company Secretary, who may be authorized individually or collectively to disclose events to Stock Exchanges.

"Listing Regulations or LODR" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.



“**Material Events**” means individual transactions or arrangements which in the opinion of authorised Key Managerial Personnel is significant to the operations and performance of the Company read with Schedule III of the Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“**Price Sensitive Information**” means any information which relates directly or indirectly to the Company that is not generally available and which upon becoming generally available is likely to affect the price of securities of the Company.

“**Stock Exchanges**” means the recognized Stock Exchanges where the Equity Shares of the Company are listed.

3. Interpretations

Terms that have not been defined in this policy shall have the same meaning assigned to them under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Companies Act, 2013 as amended from time to time.

4. Criteria for determination of materiality of events / information

Regulation 30 of the Listing Regulations and Schedule III thereof divides the events/ information requiring disclosure into the following categories:

- a) Events/ information which are deemed material (Category A events)
- b) Events/ information as per sub-para 4 of Part A of Schedule III of SEBI LODR which have to be disclosed within 30 minutes from the conclusion of the Board Meeting [Category B events]
- c) Events/ information, the materiality of which will be determined by application of materiality criteria (Category C events)
- d) Any other information/event viz. major development 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 listed entity which may be necessary to enable the holders of securities of the listed entity to appraise its position and to avoid the establishment of a false market in such securities [Category D events]
- e) Without prejudice to the generality of para (A), (B), (C) and [D] above, the listed entity may make disclosures of event/information as specified by the Board from time to time [Category E events].

Materiality has to be determined on a case to case basis depending on specific facts and circumstances relating to the information/event. In order to determine whether a particular event/information is material in nature, the Company shall consider the criteria(s) 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; 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:
- (1) two percent of turnover, as per the last audited consolidated financial statements of the listed entity;
 - (2) 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;
 - (3) 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.

5. Guidance on occurrence of event / availability of information

The timing of occurrence of an event and/or availability of information has to be decided on a case to case basis.

In case of natural calamities, disruptions etc. the events/ information can be said to have occurred when the Company becomes aware of the information.

In matters which would depend on the stage of discussion, negotiation or approval, the events/information can be said to have occurred upon receipt of approval by the Board of Directors or after receipt of approval of the Board of Directors and shareholders, as the case may be or receipt of approval from any statutory authority, leading to finality of the event/ information.

6. Time limits for disclosure of material events/ information:

The listed entity shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions of this regulation as soon as reasonably possible and in any case not later than the following:

- (i) 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) twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the listed entity;
- (iii) twenty four hours from the occurrence of the event or information, in case the event or information is not emanating from within the listed entity

7. Disclosures of events / information

The events to be disclosed by the Company are broadly divided into following five Categories:



CATEGORY A

Covers the events to be disclosed without applying any test of materiality as per para A of Part A of Schedule III of Regulation 30.

The Company shall first disclose to stock exchange(s) of all events, as specified in Para A of Part A of Schedule III as reproduced below, or information within 30 minutes from the conclusion of the Board Meeting in which a decision is taken AND further details of the transaction, in the prescribed format, within the time frame mentioned herein below, ~~and not later than twenty four hours from the occurrence of event or information~~ without any application of the guidelines for materiality as specified in sub-regulation (4) of Regulation 30 of Listing Regulations:

Sr. No.	Material Events (as per Para A of Schedule III)	Time frame for disclosure
1.	<p>Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation/ merger/ demerger/restructuring), or sale or disposal of any unit(s), division(s), whole or substantially the whole of the undertaking(s) or subsidiary of the listed entity, sale of stake in the associate company of the listed entity or any other restructuring.</p> <p>Explanation.- For the purpose of this sub-para, the word 'acquisition' shall mean, -</p> <ul style="list-style-type: none">(i) acquiring control, whether directly or indirectly; or,(ii) acquiring or agreeing to acquire shares or voting rights in, a company, whether directly or indirectly, such that –<ul style="list-style-type: none">a. The listed entity holds shares or voting rights aggregating to five per cent or more of the shares or voting rights in the said company, or;b. There has been a change in holding from the last disclosure made under sub clause (a) of clause (ii) of the Explanation to this sub-para and such change exceeds two per cent of the total shareholding or voting rights in the said company.c. the cost of acquisition or the price at which the shares are acquired exceeds the threshold specified in sub-clause (c) of clause (i) of sub-regulation (4) of regulation 30. <p>Explanation (2):- For the purpose of this sub-paragraph, “sale or disposal of subsidiary” and “sale of stake in associate company” shall include-</p> <ul style="list-style-type: none">(i) an agreement to sell or sale of shares or voting rights in a company such that the company ceases to be a wholly	Within 12 hours*



	<p>owned subsidiary, a subsidiary or an associate company of the listed entity; or</p> <p>(ii) an agreement to sell or sale of shares or voting rights in a subsidiary or associate company such that the amount of the sale exceeds the threshold specified in sub-clause (c) of clause (i) of sub-regulation (4) of regulation 30.</p>	
2.	Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities, etc.	Within 12 hours*
3.	New Rating(s) or Revision in Rating(s), including revision in outlook without revision in rating score and ESG ratings	Within 24 hours
4.	Agreements (viz. shareholder agreement(s), joint venture agreement(s), family Settlement agreement(s) (to the extent that it impacts management and control of the listed entity), agreement(s)/treaty (ies)/contract(s)with media companies) which are binding and not in normal course of business, revision(s) or amendment(s) and Termination thereof.	<p>Within 12 hours* (for agreements where listed entity is a party)</p> <p>Within 24 hours (for agreements where listed entity is not a party)</p>
4A.	<p>Agreements entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the listed entity or of its holding, subsidiary or associate company, among themselves or with the listed entity or with a third party, solely or jointly, which, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or impose any restriction or create any liability upon the listed entity, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the listed entity is a party to such agreements:</p> <p>Provided that such agreements entered into by a listed entity in the normal course of business shall not be required to be disclosed unless they, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or they are required to be disclosed in terms of any other provisions of these regulations.</p>	<p>Within 12 hours* (for agreements where listed entity is a party)</p> <p>Within 24 hours (for agreements where listed entity is not a party)</p>
5.	Fraud/defaults by a listed entity, promoter, director, or key managerial personnel, senior management or subsidiary or by listed entity or arrest of Key managerial personnel, promoter or director whether occurred in India or abroad.	Within 24 hours
6.	Change in directors, key managerial personnel (Managing Director, Chief	Within 12 hours* (except in case of



	Executive Officer, Chief Financial Officer, Company Secretary etc.), Senior Management, Auditor and Compliance Officer.	resignation) Within 24 hours in case of resignation
6A	In case of resignation of the auditor of the listed entity, detailed reasons for resignation of auditor, as given by the said auditor	Within 24 hours of receipt of such reasons from the auditor
6B	Resignation of Independent Director including reasons for resignation and other details prescribed under SEBI LODR	Within 7 days from the date of resignation
6C	Letter of resignation along with detailed reasons for the resignation as given by the key managerial personnel, senior management, Compliance Officer or director (other than independent director)	Within 7 days from the date that such resignation comes into effect
6D	In case the Managing Director or Chief Executive Officer of the listed entity was indisposed or unavailable to fulfill the requirements of the role in a regular manner for more than forty five days in any rolling period of ninety days, the same along with reasons for such indisposition or unavailability, shall be disclosed to the stock exchange	Within 12 hours*
7.	Appointment or discontinuation of share transfer agent.	Within 12 hours*
8.	Resolution Plan/ restructuring in relation to loans/ borrowings from banks/ financial institutions	Within 24 hours
9.	One time settlement with a bank.	Within 24 hours
10.	Reference to BIFR and Winding-up petition filed by any party /creditors	Within 24 hours
11.	Issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the listed entity.	Within 12 hours*
12.	Proceedings of Annual and extraordinary general meetings of the Company.	Within 12 hours*
13.	Amendments to memorandum and articles of association of the Company, in brief.	Within 12 hours*
14.	a) Schedule of Analyst or institutional investor meet and presentations on financial results made by the listed entity to analysts or institutional investors. b) Audio or video recordings and transcripts of post earnings/ quarterly calls, by whatever name called, conducted physically or through digital means	i) Presentation and the audio/ video recordings shall be promptly made available on the website and in any case, before the next trading day, within 24 hours from the conclusion of such calls, whichever is earlier. ii) Transcripts of such calls to be made



		available within 5 working days of the conclusion of such calls.
15.	<p>The following events in relation to the corporate insolvency resolution process (CIRP) of a listed corporate debtor under the Insolvency Code:</p> <ul style="list-style-type: none">a. Filing of application by the corporate applicant for initiation of CIRP, also specifying the amount of default;b. Filing of application by financial creditors for initiation of CIRP against the corporate debtor, also specifying the amount of default;c. Admission of application by the Tribunal, along with amount of default or rejection or withdrawal, as applicable ;d. Public announcement made pursuant to order passed by the Tribunal under section 13 of Insolvency Code;e. List of creditors as required to be displayed by the corporate debtor under regulation 13(2)(c) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;f. Appointment/ Replacement of the Resolution Professional;g. Prior or post-facto intimation of the meetings of Committee of Creditors;h. Brief particulars of invitation of resolution plans under section 25(2)(h) of Insolvency Code in the Form specified under regulation 36A(5) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;i. Number of resolution plans received by Resolution Professional;j. Filing of resolution plan with the Tribunal;k. Approval of resolution plan by the Tribunal or rejection, if applicable;l. Specific features and details of the resolution plan as approved by the Adjudicating Authority under the Insolvency Code, not involving commercial secretsm. Any other material information not involving commercial secrets.n. Proposed steps to be taken by the incoming investor/acquirer for achieving the MPS;o. Quarterly disclosure of the status of achieving the MPS;p. The details as to the delisting plans, if any approved in the resolution plan	Within 24 hours
16.	Initiation of forensic audit along with the disclosures as specified under SEBI LODR	Within 12 hours* (if initiated by the listed entity)



		Within 24 hours (if initiated by an external agency)
17.	Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel or senior management of a listed entity, in relation to any event or information which is material for the listed entity in terms of regulation 30 of these regulations and is not already made available in the public domain by the listed entity.	Within 24 hours
18.	Action(s) initiated or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the listed entity, in respect of the following: (a) search or seizure; or (b) re-opening of accounts under section 130 of the Companies Act, 2013; or (c) investigation under the provisions of Chapter XIV of the Companies Act, 2013;	Within 24 hours
19.	Action(s) taken or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the listed entity, in respect of the following: (a) suspension; (b) imposition of fine or penalty; (c) settlement of proceedings; (d) debarment; (e) disqualification; (f) closure of operations; (g) sanctions imposed; (h) warning or caution; or (i) any other similar action(s) by whatever name called	Within 24 hours
20.	Voluntary revision of financial statements or the report of the board of directors of the listed entity under section 131 of the Companies Act, 2013.	Within 12 hours*

Note:

** In case the event or information emanates from a decision taken at a Board Meeting, the same shall be disclosed within thirty minutes from the closure of such meeting as against the timeline indicated in the table above.*

In case the disclosure is made after the time lines specified above, the Company shall, along with such disclosures provide explanation for delay.

CATEGORY B

Covers the material events as per sub – para 4 of Part A of Schedule III of Regulation 30.

The Company shall disclose to the Stock Exchanges all events as specified in sub-para 4 of Para A of Part A of Schedule III **within thirty minutes** of the closure of the meeting of Board of Directors / Committee of Directors held to consider the following, without any application of the guidelines for materiality.

Sr. No.	Material Events (As per Sub-para 4 of Para A of Part A of Schedule III)
1.	Dividends and/or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid or dispatched.
2.	Any cancellation of dividend with reasons thereof,
3.	The decision on buyback of securities.
4.	The decision with respect to fund raising proposed to be undertaken,
5.	Increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched,
6.	Reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to;
7.	Short particulars of any other alterations of capital, including calls;
8.	Financial results.
9.	Decision on voluntary delisting by the Company from stock exchanges

CATEGORY C

Covers the events to be disclosed, if considered material as per sub-regulation 4 of Regulation 30.

The Company shall disclose to stock exchange(s) of all events as specified in Para B of Part A of Schedule III as reproduced below, based on application of the guidelines for materiality, as specified in sub-regulation (4) of Regulation 30 of Listing Regulations, within the time frame specified herein below:

Sr. No.	Events (As per Para B of Part A of Schedule III)	Timeframe for disclosure
1	Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.	Within 12 hours*
2	Any of the following events pertaining to the listed entity: (a) arrangements for strategic, technical, manufacturing, or marketing tie-up; (b) adoption of new line(s) of business; or (c) closure of operation of any unit, division or subsidiary (in entirety or in piecemeal).	Within 12 hours*



3	Capacity addition or product launch.	Within 12 hours*
4	Awarding, bagging/ receiving, amendment or termination of awarded/bagged / orders/contracts not in the normal course of business.	Within 24 hours
5	Agreements (viz. loan agreement(s) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.	Within 12 hours* (for agreements where listed entity is a party) Within 24 hours (for agreements where listed entity is not a party)
6	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.	Within 24 hours
7	Effect(s) arising out of change in the regulatory framework applicable to the Company.	Within 24 hours
8	Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the Company.	Within 24 hours
9	Frauds or defaults by employees of the listed entity which has or may have an impact on the listed entity.	Within 24 hours
10.	Options to purchase securities including any ESOP /ESPS Scheme	Within 12 hours*
11.	Giving of Guarantees or indemnity or becoming a surety, by whatever name called, for any third Party	Within 12 hours*
12.	Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.	Within 24 hours
13.	Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority	Within 12 hours*

Note:

** In case the event or information emanates from a decision taken at a Board Meeting, the same shall be disclosed within thirty minutes from the closure of such meeting as against the timeline indicated in the table above.*

In case the disclosure is made after the time lines specified above, the Company shall, along with such disclosures provide explanation for delay.

CATEGORY D

Covers information / events with major development **within 24 hours** as per para C of Part A of Schedule III of Regulation 30.



Events (As per Para C of Part A of Schedule III)

Any other information/event viz. major development 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 listed entity which may be necessary to enable the holders of securities of the listed entity to appraise its position and to avoid the establishment of a false market in such securities.

CATEGORY E

Covers disclosure as per Para D of Part A of Schedule III of Regulation 30 to be made within the timelines specified by SEBI.

Events (As per Para D of Part A of Schedule III)

Without prejudice to the generality of the categories for disclosures stated above, the Company shall, make disclosures updating material developments on a regular basis, as specified by the Securities and Exchange Board of India from time to time.

8. Disclosure of agreements between stakeholders to which the Company may or may not be a party:

All the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel and employees of a listed entity or of its holding, subsidiary and associate company, who are parties to the agreements specified hereinbelow, shall inform the listed entity about the agreement to which such a listed entity is not a party, **within two working days of entering into such agreements or signing an agreement to enter into such agreements**

Following agreements shall be considered and disclosed as above:

Agreements entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the listed entity or of its holding, subsidiary or associate company, among themselves or with the listed entity or with a third party, solely or jointly, which, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or impose any restriction or create any liability upon the listed entity, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the listed entity is a party to such agreements:

Provided that such agreements entered into by a listed entity in the normal course of business shall not be required to be disclosed unless they, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or they are required to be disclosed in terms of any other provisions of these regulations.

Explanation: For the purpose of this clause, the term “directly or indirectly” includes agreements creating obligation on the parties to such agreements to ensure that listed



entity shall or shall not act in a particular manner.

9. Disclosure of events/ information w.r.t Subsidiaries

The Company shall disclose all events or information with respect to subsidiaries which are material for the Company. The materiality of all such events / information shall be determined of the persons authorized under this Policy based on the criteria stated hereinabove.

10. Guidance of when an event/ information can be said to have occurred for disclosure

- Depending on the stage of discussion, negotiation or approval:
 - Upon receipt of approval of Board of Directors, e.g. further issue of capital by rights issuance
 - After receipt of approval of Board of Directors and Shareholders
 - In case of price sensitive matters, such as decision on declaration of dividend, etc., disclosure to be made on receipt of approval of the event by the Board of Directors, pending Shareholders approval.
 - In case in-principle approval or approval to explore (which is not final approval) is given by the Board of Directors, the same shall not require disclosure.

- Instances where there is no discussion, negotiation or approval required, e.g. in case of natural calamities, disruptions, etc.:
 - Depends when the listed entity becomes aware of the event/ information
 - As soon as an officer or entity has, or ought to have reasonably come into possession of the information in the course of performance of his duties.

11. Authorization for determining materiality of events and making disclosures thereof

The Whole Time Director, President (Corporate Affairs, Operations & Company Secretary) and President & Chief Financial Officer of the Company are severally and/or jointly authorised by the Board of Directors for the purpose of determining the materiality of an event / information for the purpose of making disclosure to the Stock Exchanges under this Policy.

The President (Corporate Affairs, Operations & Company Secretary) is authorized for making disclosures to the Stock Exchanges as well as uploading the information on Company's Website. The Contact details of the above personnel's (KMPs) will be intimated to the Stock Exchanges. Any change therein as maybe determined by the Board of Directors from time to time shall also be intimated to the Stock Exchanges by the Authorized Persons.



The materiality of the events/information outlined above are indicative in nature. There may be likelihood of some unforeseen events emerging during the course of business scenario time to time, hence, the persons as authorized above should consider the criteria stated above and exercise necessary judgement while accessing the materiality of the event associated with the Company.

12. Website Disclosures and Archival Policy

The event / information disclosed to the stock exchanges under this Policy shall also be placed on the website of the Company for a minimum period of five years or for such other period, if the period prescribed shall be more than five years by the aforesaid Regulations and /or the Securities Laws as defined in the aforesaid Regulations.

After completion of the minimum period of five years or such other period as prescribed by the Regulations and/or Securities Laws, the events or information may cease to be displayed on the website of the Company. The Company shall also make disclosure of events / information as may be specified by the Securities and Exchange Board of India from to time.

13. Amendment:

The Board may subject to the applicable laws amend any provisions or substitute any of the provision (s) with the new provision (s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

14. Scope and Limitation

In any circumstance where the provisions contained in this Policy differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over the Policy stated hereinabove.

15. Dissemination of the Policy

This Policy shall be hosted on the website of the Company for the information of stakeholders.
