

POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURES

BACKGROUND

ELANTAS Beck India Limited (**Company**) is committed to being open and transparent with all stakeholders and in disseminating information in fair and timely manner. Pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, (**Listing Regulations**), the Company has formulated Policy for determination of materiality of events and information for disclosure to the Stock Exchanges (**Policy**).

This Policy is aimed at providing guidelines to the Management of the Company, to determine the materiality of events or information, which could affect the investment decisions and ensure timely and adequate dissemination of information to the stock exchanges.

The Policy applies in respect of disclosure of material events in relation to the Company, its Directors, Promoters, Key Managerial Personnel, Senior Management Personnel as required under Applicable Laws.

GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION & ITS DISCLOSURE

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. Further an information or event may also be regarded as material, if whose value or the expected impact in terms of value,

exceeds the thresholds prescribed under the Listing regulations. Materiality will be determined on a case-to-case basis depending on specific facts and circumstances relating to the information/event.

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

Further, the Company shall disclose all events or information within the timelines specified in the Applicable Laws.

The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information and on its own initiative. Further it shall confirm or deny any event or information to stock exchange(s) reported in the media.

The Company shall make disclosures updating the material developments pertaining to material events on a regular basis, till such time the event is resolved/closed, and to be disclosed to the stock exchanges with relevant explanations.

AUTHORISED PERSONS (KMPs)

The Company's Key Managerial Personnel shall jointly and/ or severally determine materiality of information/ events and dissemination of the same as covered by this Policy. The Company Secretary will be the single point of contact for the above signatories who are authorized to determine materiality and make disseminations covered by this Policy.

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

The Senior Management Personnel and such other persons, as determined by the aforesaid authorized persons shall be relevant employees for the purpose of this policy, to identify potential event or information pertaining to their functional roles and report the same to the aforesaid Authorized Persons.

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DISCLOSURE ON THE WEBSITE OF THE COMPANY

All such events or information which have been disclosed to the stock exchange under the Listing Regulations shall be made available on the Company's website. Such events or information shall be placed on the website of the Company for a minimum period of five years. The Policy and the contact details of the persons authorized by the Board shall be available on the website of the Company.

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.

EFFECTIVE DATE

The Policy is effective from the date of its dissemination on the Website of the Company.

Sirkumar Ramkrishnan
Managing Director
DIN: 07685069