

Sicagen India Limited

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CIN: 74900TN2004PLC053467

POLICY FOR DETERMINING MATERIALITY FOR DISCLOSURE OF INFORMATION*

(Pursuant to Regulation 30 of the SEBI (Listing Obligation & Disclosure Requirement) Regulations, 2015)

1. Preface

As per Regulation 30 of the SEBI (Listing Obligation & Disclosure Requirement) Regulations, 2015 (hereinafter referred to as “the Regulations”), the Company is required to make disclosure of various events/information to the Stock Exchanges as enshrined in Schedule III to the Regulations.

The events / information have been classified into two categories namely,

- (i) Events/information to be disclosed irrespective of materiality (as specified in Para A of Part A of Schedule III); and
- (ii) Events/information to be disclosed based on the application of guidelines for materiality as per the criteria prescribed therein (as specified in Para B of Part A of Schedule III).

In this regard the Board of Directors of the Company is mandated to approve a policy for determining the materiality and also nominate one or more Key Managerial Personnel (KMP) to decide on the same and issue the disclosures to the Stock Exchanges.

In addition to the above, the Company is also required to disclose major development that is likely to affect the business, such as emergence of new technologies, expiry of patents, change in accounting policy which may have significant impact on the accounts, etc.

2. Policy for determination of materiality

The events/information specified in Para B of Part A of Schedule III to the Regulations shall be deemed material if in the opinion of the Designated KMP (as specified below):

- i. Omission of the events/information will result in discontinuation or alteration of the events/information already disclosed and/or available in public domain; or
- ii. Omission of non-disclosure of the events/information will have significant impact in the securities market, if and when the same comes to public domain subsequently.
- iii. Omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:

(1) 2% of turnover, as per the last audited consolidated financial statements of the listed entity;

- (2) 2% 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) 5% 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;
- iv. Such events/information are likely to affect the business of the Company significantly and would be essential for the investors dealing in the securities of the Company to be aware of the same.

The above policy on materiality shall also be applicable in relation to the disclosure of major developments specified under Para C of Part A of Schedule III to the Regulations.

In addition to the above, the stipulations in the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information approved by the Board of Directors of the Company under the SEBI (Prohibition of Insider Trading) Regulations, 2015 shall also be taken into account for disclosure of any events and information.

3. Authority for determination of materiality of events/information and disclosure thereof

Pursuant to Regulation 30(5) of the Regulations, Whole Time Director of the Company is authorized to determine the materiality of the events/information to be disclosed taking into account the above policy. CFO or Company Secretary or in their absence such other officer as may be specified by Whole Time Director is authorized to make such disclosures to the Stock Exchanges.

4. Time frame for disclosure of material events/information

Pursuant to Regulation 30(6) of the Regulations, 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) 30 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 hours from the occurrence of the event or information, in case the event or information is emanating from within the listed entity;
- (iii) 24 hours from the occurrence of the event or information, in case the event or information is not emanating from within the listed entity;

5. Validity and amendment

This Policy shall be valid until otherwise determined by the Board. Whole Time Director is authorized to review the Policy from time to time and make such changes as may be deemed necessary. The details of such changes shall be submitted to the Board at the immediately following meeting for review and ratification.

**Amended at the Board Meeting held on 10.08.2023.*