

Singer India Limited

('SIL/Company')

Policy on Determination of Materiality of Event(s)

1. OBJECTIVE

The Policy on Determination of Materiality is framed in accordance with the requirements of the Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 hereinafter referred to as "SEBI LODR/ Listing Regulations". The objective of the Policy is to determine materiality of events or information of the Company and to ensure that such information is adequately disseminated in pursuance with the Regulations.

The amended policy shall be effective from 23rd March, 2023.

The objectives of this Policy are as follows:

- a. To ensure that the Company complies with the disclosure obligations to which it is subject as a publicly-traded company as laid down by the Listing Regulations, various securities laws and any other legislations.
- b. To ensure that the information disclosed by the Company is timely and transparent.
- c. To ensure that corporate documents and public statements are accurate and do not contain any misrepresentation.
- d. To protect the confidentiality of material/ price sensitive information within the context of the Company's disclosure obligations.
- e. To provide a framework that supports and fosters confidence in the quality and integrity of information released by the Company.
- f. To ensure uniformity in the Company's approach to disclosures, raise awareness and reduce the risk of selective disclosures.

2. BACKGROUND AND APPLICABILITY

SIL is committed to being open and transparent with all stakeholders and in disseminating information in a fair and timely manner. This Policy on determination of materiality of events or information that warrant disclosure to investors **and** has been framed in compliance with the requirements of the Listing Regulations (the "Policy").

This Policy shall be applicable on all events in the Company, as and when they come under the criteria enumerated in the Policy.

3. AUTHORITY TO KEY MANAGERIAL PERSONNEL

The Managing Director, Chief Financial Officer and Company Secretary of the Company shall have the authority for the following:

- i. determines the materiality of information,
- ii. determine any information as material,
- iii. decide the appropriate time at which disclosure is to be filed with the stock exchange.
- iv. Decide the details that may be filed in the best interest of investors.

4. CRITERIA FOR DETERMINING THE MATERIALITY

The Company shall determine the criteria of materiality as specified under Clause (i) of sub-regulation (4) of Regulation 30 of the Listing Regulations.

In any case where the criteria specified in Regulation 30(4)(i) of Listing Regulations are not applicable, an event/information may be treated as being material if in the opinion of the Board of Directors of Company, the event / information is considered material.

5. DISCLOSURE

- a. The Disclosure of the events enumerated in Para A of Part A of Schedule III of Listing Regulations are deemed to be material events and the Company shall make disclosure of such events or information to the stock exchanges within the time frame as mentioned in the Listing Regulation.
- b. The Company shall make disclosure of events as specified in Para B of Part A of Schedule III of Listing Regulations based on the application of criteria for determining the materiality as per clause 4 of the policy.
- c. The disclosure of any other event(s) shall be made as soon as reasonably possible and not later than timelines as specified in Regulation 30 of the Listing Regulations from the occurrence of event or information:

Provided that in case the disclosure is made after the timeline specified in above regulation from the occurrence of the event or information, the listed entity shall, along with such disclosures provide explanation for delay.

- d. The Compliance Officer of the Company shall be responsible for making above said disclosures to the Stock Exchange(s)
- e. The Company shall with respect to all the disclosure of the events specified in Listing Regulations/ Circulars, make disclosures updating material developments on regular basis, till such time the event is resolved / closed, with relevant explanations.
- f. The company shall also disclose all events or information with respect to its subsidiaries which are material for the listed entity.
- g. The Company shall disclose any other event or information, which has not been indicated in Para A and Para B of Part A of Schedule III of Listing Regulations, which is available with the company, but which may have material effect on it.
- h. The Company shall provide specific and adequate reply to all the queries raised by the stock exchange(s) with respect to any events or information:

provided that the stock exchange(s) shall disseminate information and clarification as soon as reasonably practicable.

- i. All the events must be disclosed in the following manner-

- inform the stock exchanges in which the securities of the Company are listed;
- upload on the corporate website of the Company.

6. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) 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.

7. DISSEMINATION OF POLICY

This Policy shall be hosted on the website of the Company and address of such web link thereto shall be provided in the Annual Report of the Company.