

SHREEJI TRANSLOGISTICS LIMITED

POLICY ON DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

I. BACKGROUND

Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Regulations**”) requires every Listed Company to frame a policy for determination of materiality of an event/ information based on the criteria specified in Regulation 30 for disclosure to the Stock Exchanges and hosting of it on the website of the company.

Regulation 30 of the Regulations mandates the disclosure of all events specified in Para A of Part A of Schedule III of the Regulations (deemed material events) to the Stock Exchange(s).

The disclosure of events specified in Para B of Part A of Schedule III of the Regulations (given in Annexure to this Policy) shall be made to the Stock Exchange(s) based on the application of following materiality thresholds.

II. OBJECTIVE

The objective of the Policy is to determine materiality of events or information and timely disseminate the information to enable the investors to make well informed investment decisions.

III. POLICY

The Company shall consider the following criteria for determination of materiality of event or information for disclosure of items listed in Para B of Part A of Schedule III of the Regulations:

- (a) where the omission of an event or information, is likely to result in discontinuity or alteration of event or information already available publicly; or
- (b) where 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;

- (c) where the criteria specified in sub-clauses (a) and (b) are not applicable, an event / information may be treated as being material, if in the opinion of the Board of Directors of the Company, the event / information is considered material.

IV. GUIDELINES FOR MATERIALITY

Wholetime Director designated for the purpose is authorised to formulate quantitative test for determination of materiality of events or information as listed out in Para B of Part A of Schedule III of the Regulations for making disclosure and place the same on the website of the Company.

V. MODIFICATION OF THE POLICY

In case of any amendments to the Regulations, which makes any of the provisions in the Policy inconsistent, the provisions of the Regulations shall prevail. Further, in case there are any regulatory changes, which require modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Board of Directors of the Company.

**Quantitative test for determination of materiality for disclosure of event or information
(Pursuant to Policy for determination of Materiality of Events or Information)**

Guidelines for determination of materiality of events or information described in Para B of Part A of Schedule III of the SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015.

Sr. No.	Events/Information	Guidelines
1.	Commencement or postponement in date of Commercial Production or Commercial Operation	The date of commencement or postponement of commercial production or commercial operation of a unit / division where revenue from the unit / division for a full year is estimated to be not less than 10% of the total revenues of the Company for the financial year.
2.	Change in general character or nature of business	Any change in general character or nature of business, brought about by arrangement for strategic, technical, manufacturing or marketing tie-up, adoption of new line of business or closure of operation results in increase / decrease of not less than 10% of the total revenue of the Company for the financial year.
3.	Capacity addition / product launch	Capacity addition / product launch where generation of revenue from such capacity addition / product launch is estimated to be not less than 10% of the total revenue of the Company for the financial year.
4.	Awarding, bagging or receiving orders / contracts not in the normal course of business or amendment or termination thereof	Awarding / bagging or receiving order / contract or amendment or termination thereof which increase or decrease revenue of the Company by not less than 10% of the total revenue of the Company for the financial year.
5.	Agreements	Loan Agreement or any other agreement which is binding and not in the normal course of business of the Company, or their revision or amendment or termination for borrowing exceeding 50% of net worth of the Company in a financial year.
6.	Disruption of Operation	Disruption of operation of a unit / division of the Company, if disrupted due to natural calamity, such as earthquake, flood, fire or an act attributed to the nature,

		shall be disclosed immediately after the situation reach to normal and preliminary assessment is made or disruption of operation due force majeure or events such as strike or lockout, provided the total revenue affected for such unit / division is not less than 10% of the total revenue of the Company for the financial year.
7.	Regulatory framework	Any change in regulatory framework that affects the revenue of the Company by not less than 10% of the total revenue of the Company for the financial year.
8.	Litigation / Dispute / Regulatory Action	Any litigation / dispute / regulatory action which have impact of more than 20% of net worth of the Company in a financial year.
9.	Fraud/ Default	Fraud / default committed against the Company by Directors (other than Key Managerial Personnel) or employees of the Company, after assessing the correctness of such fraud / default which may cause loss to the Company by an amount exceeding Rs. 1 Crore.
10.	Option to purchase Securities including ESOP / ESPS Scheme	Any decision to buy back shares / other securities includes ESOP / ESPS to be informed.
11.	Giving of Guarantee or Indemnity or becoming a Surety	Giving a guarantee, indemnity or becoming a surety for any third party, if such guarantee, indemnity or surety exceeds 50% of net worth of the Company , under a single instrument or taken together with other instrument for the same person.
12.	Granting, withdrawal, surrender, cancellation or suspension of Key Licenses or regulatory approvals	If such granting, withdrawal, surrender, cancellation or suspension of Key Licenses or Regulatory approvals results into increase or decrease or revenue by not less than 10% of the total revenue of the Company for the financial year, and if the same could not be translated into revenue, then as decided by the Wholetime Director of the Company designated for the purpose.

Note : The above threshold limit shall be determined on the basis of audited statement of the financial year preceding the year in which the event occur.