

POLICY FOR DETERMINATION OF MATERIALITY

Approved by the Board on December 31, 2022

1. Background

KRISHCA STRAPPING SOLUTIONS LIMITED ("the **Company**") is committed to being open and transparent with all stakeholders and believes in disseminating information in a fair and timely manner.

Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (hereinafter referred to as "LODR"), mandates disclosure of any events or information that, in the opinion of the board of directors ("Board") of the company, is material.

Regulation 30(4) of the LODR requires every listed entity to frame a policy for the determination of the materiality of events and information that requires appropriate disclosure to the stock exchanges.

Accordingly, the Board of the Company herein sets out a policy for the determination of the materiality of events and information and disclosure (hereinafter referred to as the "**Policy**") so that such events and information can be promptly disclosed to the stock exchanges, in line with the applicable regulatory requirements.

This policy is effective from the date of the listing of the company's securities.

2. Objectives of the Policy

The objectives of this policy are as follows:

- a) To ensure that the company complies with the disclosure obligations of a listed company laid down by the LODR, various securities laws, and any other applicable laws (in India and overseas).
- b) To ensure that the information disclosed by the company is timely, transparent, and continuous until the termination of the specific event or information;
- c) To ensure that, to the best of the knowledge of the management, the corporate documents and public statements are accurate and do not contain any misrepresentation,
- d) To protect the confidentiality of material or 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; and
- f) To ensure uniformity in the company's approach to disclosures, raise awareness, and reduce the risk of selective disclosures.

3. Policy Details

3.1 Criteria for the determination of materiality

Materiality must be determined on a case-by-case basis depending on specific facts and circumstances relating to the information or event. In order to determine whether a particular event or piece of information is material in nature, the company shall consider the criteria mentioned below.

- a) the omission of an event or information, which is likely to result in the discontinuity or alteration of an 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) If, in the opinion of the Board of Directors, the event or information is considered material.

An illustrative list of events or information that shall be disclosed to the stock exchanges based on the guidelines for materiality given above is specified in Paragraph B of Part A of Schedule III of the Listing Regulations. The events and information which shall be disclosed without application of the materiality guidelines listed in this policy as these are "deemed" to be material events are specified in Paragraph A of Part A of Schedule III of the Listing Regulations.

3.2 Guidance on the occurrence of an event or the availability of information

- i. The timing of the occurrence of an event and/or the availability of information must be decided on a case-by-case basis.
- ii. In cases of natural calamities, disruptions, etc., the events or information can be said to have occurred when the company becomes aware of the information.
- iii. In matters that would depend on the stage of discussion, negotiation, or approval, the events or information can be said to have occurred upon receipt of approval by the Board of Directors or after receipt of approval by the Board of Directors and shareholders, as the case may be.

3.3 Disclosure

- i. Disclosure of events enumerated in item number 4 of Para A of Part A of Schedule III of the Listing Regulations relating to "Outcome of meetings of the Board of Directors" shall be made within thirty minutes of the closure of the Board Meeting at which such events were considered or discussed.
- ii. All other events mentioned in Part A of Schedule III shall be disclosed as soon as reasonably possible and not later than twenty-four hours from the occurrence of the event or information. The company shall explain to the stock exchanges any delay in such disclosure beyond twenty-four hours of the occurrence of the event or information.

- iii. The disclosure of events or information of a price-sensitive nature (such as a decision on a dividend declaration) shall be made on receipt of approval of the event by the Board of Directors, pending the shareholder's approval.
- iv. The company shall ensure that the updated disclosure with respect to the material event or information is made to the stock exchanges on a regular basis, until such time as the event or information is resolved or closed, with a relevant explanation.
- v. The company shall also disclose all such events or information with respect to subsidiaries that are material to the company.
- vi. It is clarified that, regarding any event or information, only such impacts that are direct and perceivable, and not remote, shall be considered.
- vii. In addition to the above, the company may make voluntary disclosures of events or information as may be specified by the board or by SEBI from time to time.
- viii. The company shall disclose on its website all such events or information that has been disclosed to the relevant stock exchange under this policy, and such disclosures shall be hosted on the company's website for a minimum period of five years and thereafter as per its archival policy.
- ix. In cases where an event occurs or information is available with the company that has not been indicated in Paragraphs A or B of Part A of Schedule III but which may have a material effect on it, the company shall make adequate disclosures in regard thereto.

4. Person(s) responsible for disclosure

Key managerial personnel consisting of the Managing Director, the Whole-time Director, the Chief Financial Officer, and the Company Secretary (designated officers) are authorised for the purposes of determining the materiality of a particular event or information based on application of the guidelines for materiality, as specified in Paragraph 3.1, and making disclosures to the stock exchanges under this Policy. The Designated Officer shall take care to ensure that they are reasonably satisfied that any event or information being disclosed is true and correct and does not contain any misrepresentations.

The Designated Officer(s) shall have the following powers and responsibilities for determining the material events or information:

- a) To review and assess an event or information that may qualify as "material" and may require disclosure based on facts and circumstances prevailing at a given point in time.
- b) To determine the appropriate time at which the disclosures are to be made to the stock exchanges based on an assessment of the actual time of occurrence of an event or information.
- c) To disclose developments that are material in nature on a regular basis, till such time as the event or information is resolved or closed, with relevant explanations.
- d) To consider such other events or information that may require disclosure to be made to the stock exchanges that are not explicitly defined in the LODR and determine the materiality, appropriate timing, and contents of disclosure for such matters.

- e) To disclose all events or information with respect to the subsidiaries that are material to the company.

Obligations of internal stakeholders and authorised persons for disclosure

- a) Any event or information, including the information forming part of Paragraph 3 of the Policy, shall be forthwith informed to the Designated Officer(s) upon occurrence, with adequate supporting data and information, to facilitate a prompt and appropriate disclosure to the stock exchanges.
- b) The Designated Officer will then ascertain the materiality of such event(s) or information based on the above guidelines.
- c) On completion of the assessment, the Designated Officer shall, if required, make appropriate disclosure(s) to the stock exchanges.

Policy Review

The company may review the policy from time to time, and any material changes to the policy shall be subject to the approval of the board. In case of any inconsistency between the terms of the policy and the LODR, the provisions of the LODR shall prevail.

Any amendments to the provisions in LODR in relation to the Policy which requires any changes in the Policy shall get automatically incorporated in the Policy as if the same were part of the Policy and shall not require any formal approval.

Questions or clarifications about the policy or disclosures made by the company should be referred to the company secretary, who oversees administering, enforcing, and updating this policy.

Website

The Policy shall be disclosed on the website of the Company.