



HP ADHESIVES LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS AND INFORMATION

1. BACKGROUND

This Policy has been made pursuant to Regulation 30 (4) (ii) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) which requires the Company to formulate a policy for determination of materiality of events and information that warrant disclosures to investors.

2. OBJECTIVE OF THE POLICY

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 Listing Regulations and to provide an overall governance framework for such determination of materiality.

3. RESPONSIBILITIES FOR DISCLOSURES

The Compliance officer to have responsibility for:

- (a) deciding if information should be disclosed to the Stock Exchanges, based on the guidelines set forth in this Policy and making appropriate disclosures in respect thereto;
- (b) ensuring compliance with the Company's continuous disclosure obligations;
- (c) establishing a system to monitor compliance with the Company's continuous disclosure obligations and this Policy.

4. DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION

Materiality will be determined on a case to case basis depending on the facts and the circumstances pertaining to the event or information.

In order to enable determining whether a particular event/information is material in nature, the following criteria in accordance with the Listing Regulations shall be considered:

- (a) the omission of an event or information, which is likely to result in discontinuity or alteration of 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;
- (c) In case 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.

5. DISCLOSURE OF EVENTS AND INFORMATIONS

The Disclosure of information either to stock exchange or in the press or public medium shall be routed through the Compliance Officer. All the directors, key managerial persons and employees one level below board of directors (including functional heads) shall, on becoming aware of any information at any time which may be considered to be material as per criteria specified, must immediately report the same with adequate supporting data to the Compliance officer. Based on the information or event, the Compliance Officer shall decide about the disclosure of information or any event.

The Company shall disclose to the stock exchange(s) all material events or information as soon as reasonably possible and not later than twenty-four hours from the occurrence of event or information.

The Company will publicly release all information disclosed to the Stock Exchanges under this Policy, by placing it on its website for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on website.

The events or information specified in Para A of Part A of Schedule III of the Regulations which shall be disclosed without any application of the guidelines for materiality mentioned in this Policy.

The events or information specified in Para B of Part A of Schedule III of the Regulations shall be disclosed upon application of the guidelines for materiality mentioned in this Policy.

6. REVIEW AND AMENDMENTS

The Compliance officer, in consultation with the Board, will review this policy as often as he considers necessary. The Board may change this policy from time to time by resolution.

7. EFFECTIVE DATE:

The Policy as approved by the Board of Directors shall be effective from July 7, 2021.

8. SCOPE AND LIMITATION

In the event of any conflict between the provisions of this Policy and the Listing Regulations/Companies Act, 2013 or any other statutory enactments, rules, such provisions of Listing Regulations/Companies Act, 2013 or statutory enactments, rules shall prevail over this Policy.

9. WEBSITE:

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

10. CONTACT DETAILS:

Queries or clarifications about the policy or disclosures made by the Company should be referred to the Company Secretary & Compliance officer of the Company, who is in charge of administering, enforcing and updating this Policy:

Name of Compliance Officer: Jyoti Nikunj Chawda

Contact no.: 022-28388906.

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