



# K I C METALIKS LIMITED

"Sir RNM House" 3B, Lal Bazar Street,  
4th Floor, Room No. 2, Kolkata - 700 001  
Phone : +91-33-3068 8681 / 3068 8683  
Fax : +91-33-4001 9636

## Policy for Determination of Materiality of Events or Information

### 1. LEGAL FRAMEWORK

This Policy for Determination of Materiality of Events or Information is aimed at providing guidelines to the management of **K I C Metaliks Limited**, to determine the materiality of events or information, which could affect investment decisions and ensure timely and adequate dissemination of information to the Stock Exchange(s) (as hereinafter defined).

This Policy has been formulated in accordance with the current guidelines laid down by Securities Exchange Board of India under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, with respect to disclosure of events and information.

Pursuant to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, issued on September 2, 2015, the Board at their meeting held on November, 13, 2015 has approved the "Policy for Determination of Materiality of Events or Information". The Board shall review, and if found required, may amend this Policy from time to time.

This Policy will be applicable to the Company effective **December 1, 2015**.

### 2. OBJECTIVE

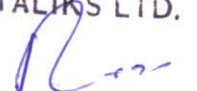
The objective of this Policy is to serve as a guiding charter to the management to ensure that timely and adequate disclosure of events or information are made to the investor community by the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, to enable them to take well informed investment decisions with regard to the securities of the Company.

### 3. MEANINGS OF TERMS USED

- (a) "Act" means the Companies Act, 2013 (and the Rules) and the Companies Act, 1956 to the extent applicable.
- (b) "Board" means the Board of Directors of the Company.
- (c) "Company" means K I C Metaliks Limited, having its registered office at "Sir RNM House", 3B, Lal Bazar Street, 4<sup>th</sup> Floor, Room No.-2, Kolkata – 700 001, West Bengal.
- (d) "Key Managerial Personnel" means key managerial personnel as defined under sub-section (51) of section 2 of the Companies Act, 2013.



FOR KIC METALIKS LTD.

  
Managing Director

CIN No. : L01409WB1986PLC041169

Factory : Raturia, Angadpur, Durgapur - 713 215, Phone : 9874943342

E-mail : info@kicmetaliks.com ● Website : www.kicmetaliks.com



- (e) "Listing Regulations" means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- (f) "Policy" means this policy, as amended from time to time.
- (g) "SEBI" means the Securities and Exchange Board of India.
- (h) "Rules" means the rules made under the Companies Act, 2013.
- (i) "Stock Exchange(s)" means BSE Limited where the equity shares of the Company are listed.

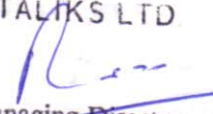
#### 4. POLICY AND PROCEDURES

##### A. MATERIALITY THRESHOLDS :

- As stated above, in terms of the Regulation 30 of the Regulations, the Company is required to make disclosures of any events or information which, in the opinion of the Board of the Company, is material.
- Further, the events specified in **Para A of Part A of Schedule III** are deemed to be material events and the Company is mandatorily required to make disclosure of such events.
- The Company is required to make disclosure of events specified in **Para B of Part A of Schedule III**, based on application of the guidelines for materiality as set out in this Policy. In this context, the following has been approved and adopted by the Board of the Company at its meeting held on November, 13, 2015, with the objective of determining materiality of events.
  1. The events specified in Para A of Part A of Schedule III of the Regulations and as set out in **Annexure I** to this Policy shall be disclosed by the Company as applicable from time-to-time and in a manner as set out in the Regulations and this Policy.
  2. For disclosing the events specified in Para B of Part A of Schedule III, the Company shall consider the following criteria for determination of materiality of an event/information:
    - 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. Where it would be difficult to report any event including events specified in Para B of Part of Schedule III and set out in **Annexure II** to this Policy, based on qualitative



FOR KIC METALIKS LTD

  
Managing Director



criteria as stated in points a) and b) above, the same may be considered material for disclosure, upon meeting materiality thresholds as mentioned herein below:

- i. For events specified in Annexure II of this Policy, if the impact of the occurrence of such an event would exceed 20% of the gross standalone turnover of the Company, in the immediately preceding accounting year.
  - ii. For events specified in Annexure II of this Policy with respect to a Subsidiary of the Company, if the impact of the occurrence of such an event would exceed 20% of the gross consolidated turnover of the Company, in the immediately preceding accounting year.
- d. in case where the criteria specified in sub-clauses a to c are not applicable, an event/information may be treated as being material if in the opinion of the Board and/or the Managing Director, the event/information is considered material.
- e. Following shall be the additional considerations in determining the materiality thresholds as stated above:
- Materiality to be assessed at the level of each individual disclosure requirement and, where relevant, on an aggregate basis; and
  - Additional considerations to be taken into account by the Company when they are considered as plausible and objectively reasonable.
3. As specified in Para C of Part A of Schedule III of the Regulations, the Company shall promptly disclose any other information/event viz., major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the financial statements of the Company and brief details thereof and any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities. Further, the Company may make disclosures of event/information as specified by the Board from time to time.

#### **B. GUIDANCE ON TIMING OF AN EVENT OR INFORMATION :**

The Company may be confronted with the question as to when an event/information can be said to have occurred.

In certain instances, the answer to above question would depend upon the stage of discussion, negotiation or approval and in other instances where there is no such discussion, negotiation or approval required viz. in case of natural calamities, disruptions etc, and the answer to the above question would depend upon the timing when the Company became aware of the event/information.

In the former, the events/information (based on the facts and circumstances), can probably be said to have occurred upon receipt of approval of Board.



FOR KIC METALIKS LTD.

  
Managing Director

