



**Sterlite Technologies Limited**

**POLICY FOR DETERMINATION OF MATERIALITY OF ANY EVENT / INFORMATION**

**Owner:**  
Corporate Secretarial Department

**Issue Date:** October  
26, 2015

**Revision Date:**  
December 06, 2022

**Version:**  
PDMEI Policy – 1.3

## Table of Contents

S. No.	Particulars	Page no.
1	Purpose	2
2	Administration	2
3	Adherence of the Policy by the Employees	2
4	Persons Responsible for Disclosures	3
5	Criteria for Determination of Materiality	3
6	Disclosure of Event or Information	4
7	Procedural Guidelines for Determination of Materiality	4
8	Other Disclosures	4
9	Archival	5
10	Contact details of KMPs	5

The Board of Directors (the “Board”) of Sterlite Technologies Limited (the “Company” or “Sterlite”), has adopted the following policy with regard to determination of materiality of events or information as required by Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as ‘Listing Regulations’) at its meeting held on October 26, 2015.

## **1. PURPOSE**

The Purpose of the Policy is 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. (In India or Overseas)
- b. To ensure that 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 disclosure, raise awareness and reduce the risk of selective disclosures.

## **2. ADMINISTRATION**

The Compliance Officer of the Company (“Administrator”) shall be in-charge of administration of this Policy and to ensure that the implementation process and procedures prescribed herein are duly followed.

The Administrator is also authorised to make modifications to the Policy from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy. Any such change in the Policy, however, shall also be approved by the Board within a reasonable time. The Board shall also have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. In the event of any contradiction in the Policy and the statutory provisions, the statutory provisions shall prevail.

## **3. ADHERENCE OF THE POLICY BY THE EMPLOYEES:**

The Company expects from all its employees to understand and fully comply with this Policy and schedules. This Policy shall be posted on the web-site of the Company.

## **4. PERSONS RESPONSIBLE FOR DISCLOSURE**

The Board of Directors of the Company have authorized the Key Managerial Personnel as defined in sub-section (51) of the Section 2 of the Companies Act, 2013 (“Key Managerial Personnel” or “KMPs”) and as appointed under Section 203 of the Companies Act, 2013 to determine materiality of an event or information and to make appropriate disclosures on a timely basis. The KMPs are also empowered to seek appropriate

counsel or guidance, as and when necessary, from other internal or external stakeholders as they may deem fit.

The KMPs shall have 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, on the basis of 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 the assessment of 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 the event or information is resolved/ closed, with relevant explanations.
- d. To consider such other events or information that may require disclosure to be made to the stock exchanges which are not explicitly defined in the Listing Regulations and determine the materiality, appropriate time and contents of disclosure for such matters.
- e. To disclose all events or information with respect to the subsidiaries which are material for the Company.

## **5. CRITERIA FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION**

The Company shall consider the criteria as specified in clause (i) of sub-regulation 4 of Regulation 30 of the Listing Regulations for determination of materiality of events / information.

## **6. DISCLOSURE OF EVENTS OR INFORMATION**

- A. Upon occurrence of the events / information specified in para A of Part A of Schedule III to the Listing Regulations, the Company shall make disclosure to the Stock Exchanges without any application of the guidelines for materiality.
- B. Upon occurrence of the events / information specified in para B of Part A of Schedule III to the Listing Regulations, the Company shall make disclosure to the Stock Exchanges after following the procedural guidelines as given in para 7 of this Policy.

## **7. PROCEDURAL GUIDELINES FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION**

The Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, Presidents, Head of the Departments who are responsible for relevant areas of operations of the Company's or its subsidiaries ("Responsible Officers") must report to the Chief Executive Officer or Chief Financial Officer or Company Secretary of the Company any event / information which may possibly be material or of which the Responsible Officer is unsure as to its materiality. The event / information should be reported immediately after a Responsible Officer becomes aware of it. On receipt of communication of potential material event / information, the any Key Managerial Personnel will:

- A. Review event / information;
- B. Assess whether the event / information is required to be disclosed to the Stock Exchanges under the Listing Regulations;
- C. The procedure to be followed in relation to the lodgement of announcement of material event / information is as follows:

- a. Prepare draft announcement to the Stock Exchanges: If the event / information is material, the Head-Corporate Communications or any other concerned officials from Corporate Communication Department will prepare draft announcement to the Stock Exchanges which is factual and expressed in clear manner.
- b. Lodge Announcements: The Administrator or any person instructed by Administrator on behalf of the Company will lodge or arrange for lodgement of the announcement with the Stock Exchanges.
- c. Post announcement on website: After lodgement of the announcement with the Stock Exchanges, the Corporate Communication Department will arrange to place it on the website of the Company.
- d. All the announcements made under this Policy shall be kept on the website as per the relevant statutory requirements and / or the prevalent practices of the Company.

## **8. OTHER DISCLOSURES**

Where necessary with respect of occurrence of the events / information specified in para C and D of Part A of Schedule III to the Listing Regulations, the procedural guidelines as given in para 8 of this Policy shall mutatis mutandis be followed.

## **9. ARCHIVAL**

As prescribed under R. 30(5) of the Listing Regulations, the Company shall disclose on its website all such events or information which are disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the discretion of the Company Secretary, who may decide to retain the information hosted or discard the same.

## **10. CONTACT DETAILS OF KMPS**

- a. Mr. Ankit Agarwal : Managing Director
- b. Mr. Tushar Shroff : Chief Financial Officer
- c. Mr. Amit Deshpande: Company Secretary & Compliance Officer

Address: 4<sup>th</sup> Floor, Godrej Millennium, Koregaon Road 9, STS 12/1, Pune, Maharashtra – 411 001, India

E-mail Id: [secretarial@stl.tech](mailto:secretarial@stl.tech)

Contact no.: 020-30514000