

# RENAISSANCE GLOBAL LIMITED

## POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

### I. BACKGROUND

Regulation 30(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'LODR') requires every listed entity to frame a policy for determination of materiality of events and information that requires appropriate disclosure to the stock exchanges.

Further such disclosures are required to be hosted on the website of the listed entity.

Pursuant to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, issued on September 2, 2015, the Board of Directors of the Company had approved the "Policy for Determination of Materiality of Events or Information".

The SEBI on June 14, 2023 has notified the SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2023, amending various provisions of listing regulations including Regulation 30 and Schedule III, regarding the Materiality of Events or Information of the Company.

Accordingly, the Company herein amends the Policy for determination of materiality of events and information of the Company.

### II. GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION

As per Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company requires to make disclosures of all events specified in Para A of Part A of Schedule III of LODR to the stock exchanges.

The Events specified in Para B of Part A of Schedule III of LODR shall be disclosed to stock exchanges by the Company by application of below mentioned guidelines for determining the materiality of such events or information:

- (a) the omission of an event or information is likely to result in discontinuity or alteration of event or information already available publicly
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(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) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following(**Quantitative criteria**):

- i. 2% of consolidated turnover, as per the last audited consolidated financial statements of the Company; or
- ii. 2% of consolidated net worth as per the last audited consolidated financial statements of the Company (except in case the arithmetic value of the net worth is negative)); or
- iii. 5% of average of absolute value of consolidated profit or loss after tax for last 3 years, as per the last 3 (three) audited consolidated financial statements of the Company.

(d) Where the criteria specified in (a), (b) and (c) above are not applicable to a particular event / information then such event or information may be treated as being material if in the opinion of the board of directors of the Company, the event or information is considered material.

An illustrative list of such events / information which shall be disclosed to the stock exchanges on approval of the Board of Directors of the Company is attached as **Annexure I**.

To give effect to these requirements of LODR, the Board has authorized the Managing Director and the Company Secretary of the Company jointly to determine the materiality of any event /information and disclose the same to the stock exchanges in the prescribed time period.

In matters which would depend on the stage of discussion, negotiation or approval, the events/information can be said to have occurred upon receipt of approval by the Board of Directors and/or shareholders, as the case may be.

The Company shall also disclose all such events or information with respect to subsidiaries which are material for the company.

### **III. DISCLOSURE TO STOCK EXCHANGES**

All events/information identified as material in line with the regulation and under this Policy shall be disclosed as soon as reasonably possible and in any case not later than the following:

- i. For all material events/ information for which decision is taken in a Board meeting within 30 (thirty) minutes from the closure of the board meeting;

- ii. For all material events/ information emanating from within the Company within 12 (twelve) hours from the occurrence of the event or information;
- iii. For all material events/ information relating to the Company but emanating from outside the Company within 24 (twenty four) hours from the occurrence of the event or information.

In case the disclosure is made after the stipulated timeline, the Company shall provide an explanation for the delay along with the disclosure.

#### **IV. DISCLOSURES ON WEBSITE OF THE COMPANY**

The event / information disclosed to the stock exchanges under this Policy shall also be placed on the website of the Company for a minimum period of five years or for such other period, as may be prescribed by the applicable Regulations.

#### **V. MODIFICATION OF THE POLICY**

In case of any amendments to any existing law, rules or regulations which make any of the provisions in this Policy inconsistent, the provisions of such newly enacted law, rules or regulations shall prevail. Further, in case there are any Regulatory changes, which require modifications to this Policy, the Policy shall be reviewed and amended with due approval from the Board of Director of the Company.

#### **VI. EFFECTIVE DATE**

This policy is approved by the Board of Directors at it's meeting held on August 10, 2023 and the same shall be effective from July 13, 2023.

## Annexure I

<b>Sr. No</b>	<b>Illustrative list of events / information which shall be disclosed to the stock exchanges on approval of the Board of Directors of the Company</b>
<b>1</b>	Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
<b>2</b>	Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division (entirety or piecemeal).
<b>3</b>	Capacity addition / Product launch
<b>4</b>	Awarding, bagging/receiving, amendment or termination of awarded/bagged orders/ contracts not in the normal course of business.
<b>5</b>	Agreements (viz. loan agreement(s) (as a borrower) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
<b>6</b>	Disruption of operations of any one or more units or division of the Company due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
<b>7</b>	Effect(s) arising out of change in the regulatory framework applicable to the Company
<b>8</b>	Litigation(s)/dispute(s)/regulatory action(s) with impact.
<b>9</b>	Fraud/defaults etc. by directors (other than key managerial personnel) or employees of the Company.
<b>10</b>	Options to purchase securities including any ESOP/ESPS Scheme.
<b>11</b>	Giving of guarantees or indemnity or becoming a surety for any third party.
<b>12</b>	Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

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