

## **M.K.EXIM (INDIA) LIMITED**

### **POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION**

#### **1. INTRODUCTION**

The Securities and Exchange Board of India (SEBI) (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the Listing Regulations) requires every listed company to disclose events or information which in the opinion of the Board of Directors (the Board) of the Company are material. Accordingly, the Board of M.K.Exim (India) Limited (the Company), approved and adopted this policy on determination of materiality of events or information which are required to be disclosed to the Stock Exchanges in terms of regulation 30 of the Listing Regulations.

#### **2. OBJECTIVE**

The Company being a listed entity is obligated to comply with the disclosure requirements under the Listing Regulations and is committed to the premise that all persons investing in the publically traded securities have equal right to access information that may affect their investment decisions and believes that full and fair disclosure of material information to the public is the cornerstone to the integrity of the Capital Market. The main objective of the policy is to determine materiality of events or information on the basis of criteria specified under regulation 30(4)(i) of the Listing Regulations and to facilitate timely and adequate disclosure of material events or information which are unpublished & price sensitive and have a bearing on the performance or operations of the Company or may result in a significant market reaction in the price of securities of the Company if the omission comes to light at a later date.

#### **3. DEFINITIONS**

- i) "Act" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;
- ii) "Board" or "Board of Directors" means the Board of Directors as defined under Section 2(10) of the Companies Act, 2013.
- iii) "Company" means M.K.Exim (India) Limited
- iv) "Key Managerial Personnel" shall have the same meaning as defined under Section 2(51) of the Act.
- v) "Material events or information" means events or information as defined under Part A and B of Schedule III of the Listing Regulations.
- vi) "Officer" shall have the same meaning as defined under Section 2(59) of the Act.

#### **4. INTERPRETATION**

The words and expressions used and not defined in this policy but defined in the Companies Act, 2013 or rules made there under or the Securities and Exchange Board of India Act, 1992 or regulation made there under or Depositories Act, 1996 shall have the same meanings respectively assigned to them in those acts, rules and regulations.

#### **5. EVENTS OR INFORMATION COVERED UNDER THIS POLICY**

The regulation 30 of the Listing Regulations prescribes norms for such disclosure of material information pertaining to listed entity as under:

- (a) Events specified in para A of part A of Schedule III of Listing Regulations are required to be disclosed irrespective of application of the guidelines for materiality.
- (b) Events specified in para B of part A of Schedule III of Listing Regulations are required to be disclosed to the Stock Exchanges if they are considered material by the Company.
- (c) Any other information/event mandatorily required to be disclosed as may be specified by SEBI from time to time including but not restricting to the events specified in PART A of SCHEDULE III of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements), Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

## **6. CRITERIA FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION**

The Company shall consider the following criteria for determination of materiality of events or 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;
- (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 listed entity, the event / information is considered material.

## **7. QUANTITATIVE MATERIALITY THRESHOLD**

Where it could be possible to determine the value, where the value involved in an event/information or the impact of an event/information exceeds 20% of the total income; or exceeds 20% of the net worth, whichever is lower, or as per decided by the board time to time, such an event/information will be material in nature.

Note: Above thresholds shall be determined on the basis of audited consolidated financial statements of last financial year.

## **8. DISCLOSURE**

(a) The Company shall make disclosure of all events or information as specified in para A of part A of Schedule III of Listing Regulations to the Stock Exchanges as soon as reasonably possible and not later than twenty four hours from the occurrence of event or information:

Provided that in case the disclosure is made after twenty four hours of occurrence of the event or information, the listed entity shall, along with such disclosures provide explanation for delay:

Provided further that the disclosure with respect to events specified in sub-para 4 of Para A of Part A of Schedule III shall be made within thirty minutes of the conclusion of the board meeting.

(b) The Company shall, with respect to disclosures referred to in the regulation 30 of the Listing Regulations, make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.

(c) The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under the 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 standards of the Company, as disclosed on its website.

(d) The listed entity shall disclose all events or information with respect to subsidiaries which are material for the listed entity.

(e) The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information; Provided that the stock exchange(s) shall disseminate information and clarification as soon as reasonably practicable.

(f) The Company may on its own initiative also, confirm or deny any reported event or information to stock exchange(s).

(g) In case where an event occurs or an information is available with the listed entity, which has not been indicated in Para A or B of Part A of Schedule III, but which may have material effect on it, the listed entity is required to make adequate disclosures in regard thereof.

#### **9. AUTHORIZATION OR THE PURPOSE OF DETERMINING MATERIALITY OF ANY EVENT OR INFORMATION AND MAKING DISCLOSURE TO THE STOCK EXCHANGES**

The Board of the Company has severally authorized Key Managerial Personnel i.e. Chairman and Managing Director, Chief Financial Officer and Company Secretary of the Company for the purpose of determining materiality of an event or information and formaking the disclosure in this regard: The contact details of aforesaid Key Managerial Personnel are provided here under:

(a) Chairman and Managing Director  
E-mail: info@mkexim.com, contact no.: 0141-3937501

(b) Chief Financial Officer  
E-mail: cfo@mkexim.com, contact no. : 0141-3937501

(c) Company Secretary,  
E-mail: complianceofficer@mkexim.com, contact no. : 0141-3937501

#### **10. UPLOADING OF INFORMATION ON THE WEBSITE OF THE COMPANY**

This policy, all amendments thereto and disclosures made by or on behalf of the Company of events or information to the Stock Exchanges, pursuant to this policy shall be uploaded on the website of the Company.

#### **11. AMENDMENT**

The Board of Directors is authorised to make modifications/amendments to this policy in consonance to the provisions of SEBI (Listing Obligations and Disclosure Requirements), 2015 and any amendment thereto and the decision of the Board in this respect shall be final and binding.

Any subsequent amendment/modification in the Regulation and/or other applicable laws in this regard shall automatically apply to this policy.