



JAMNA AUTO INDUSTRIES LIMITED
POLICY FOR DETERMINATION OF MATERIALITY OF
DISCLOSURES

Introduction

1. The Policy for determination of Materiality of Disclosures (“Policy”) is formed by the Board of Directors in its Meeting held on 20 May, 2016 and amended from time to time in compliance with the Securities Exchange Board of India (Listing Obligation and Disclosures Requirement) Regulations, 2015 (“Regulations”) for making timely disclosures of material events or information to the Stock Exchanges.

Material events and information

2. Events or information specified in Part A of Schedule III of the Regulations are deemed to be material events or information.
3. Events or information specified in Para A of Part A of Schedule III of the Regulations are deemed to be material event or information without applying the materiality criteria set forth in regulation 30 of the Regulations as amended from time to time.
4. Events or information specified in Para B of Part A of Schedule III of the Regulations are deemed to be the material event or information on the basis of applicability of materiality criteria set forth in regulation 30 of the Regulations as amended from time to time.
5. In all other cases and where the criteria specified in paragraph 3 above does not apply an event or information shall be considered as material, if in the opinion of the Board of Director such an event or information is material.
6. All the Executive Directors of the Company are severally authorized to determine whether an even or information is a material event or information in terms of this Policy.

Disclosure of material event and information

7. All the events or information, which are material in terms of the provisions of Regulations shall be first disclosed to the Stock Exchanges as soon as reasonably possible but not later than the timelines specified in regulation 30 and Part A of Schedule III of the Regulations for such events or information.
8. All the material events or information disclosed to the Stock Exchanges as mentioned above shall thereafter be disclosed at the web site of the Company for a minimum period of 5 years and thereafter as per the archival policy of the Company.

9. Once a material event or information is disclosed to the Stock Exchanges under regulation 30, the Company shall further disclose and update the material development of the event on a regular basis until the matter is resolved/closed.

10. When an event or information shall be deemed to have occurred, for the purpose of disclosure under the Regulations, would depend upon the stage of discussion, negotiation or approval and in other instances where there is no such discussion, negotiation or approval required, it would depend upon the timing when the Company became aware of such event/information. The Company will follow the guidelines below in this regard:

i. The events/information shall be deemed to have occurred upon receipt of approval of Board of Directors of the Company and if approval of shareholders is also required, then after receipt of approval of both i.e. Board of Directors and Shareholders.

However, considering the price sensitivity involved, for certain events such as decision on declaration of Dividend, etc., disclosure shall be made on receipt of approval of the event by the Board of Directors, pending Shareholder's approval.

ii. Other events/ information shall be deemed to have occurred when the Company becomes aware of such events/information, or as soon as, an Officer of the Company has, or ought to have reasonably come into possession of the information in the course of the performance of his duties.

The term 'officer' shall have the same meaning as defined under the Companies Act, 2013 and shall also include promoter of the Company.

Miscellaneous

11. The policy shall be disclosed on the website of the Company i.e. www.jaispring.com.

12. Managing Director may review the Policy from time to time, however any material changes in policy will take effect only after it got approval of the Board of Directors of the Company.

13. If there is any inconsistency between the provisions of this Policy and the Regulations, the provisions specified in the Regulations would prevail and any amendment in the Regulations shall *mutatis mutandis* be deemed to have been incorporated in this Policy.

*amended on August 11, 2023.