

Cosco (India) Limited

Policy for determination of materiality for disclosure of event or information

Preamble

The objective of this Policy for determination of materiality for disclosure of event or information is to fix criteria for determination of materiality of events or information in relation to Cosco (India) Limited ("Company"), to ensure timely and adequate disclosure of material events or information to the BSE Limited ("Stock Exchange"), where the Equity Shares of the Company are Listed and to assist the relevant employees of the Company in identifying any potential material event or information and reporting the same to the authorized personnel, for determining the materiality of the said event or information and for making the necessary disclosures to the stock exchange.

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), under its Regulation 30(4) (ii) requires every listed entity to formulate a policy for determination of materiality of an event or information for the purpose of making disclosures to the stock exchange(s) and such policy is required to be disclosed on the Company's website. Considering the aforesaid requirements, the Company has formulated this Policy for determining materiality of an event or information for the purpose of disclosures to be made by the Company to the stock exchange(s).

Scope

A. Events/ information specified under Regulation 30 read with Para A of Part A of Schedule III to the Listing Regulations (as applicable to the Company from time to time) shall be disclosed by the Company to Stock Exchange without application of the guidelines for materiality within the timelines as prescribed under the Listing Regulations.

B. Events/ information specified under Regulation 30 read with Para B of Part A of Schedule III of the Listing Regulations (as applicable to the Company from time to time), shall be disclosed to the stock exchange upon application of the guidelines for materiality within the timelines as prescribed under the Listing Regulations.

Materiality and occurrence of the event or information must be determined on a case-to-case basis depending on specific facts and circumstances relating to the events/ information and the Company shall take guidance from the provisions of Listing Regulations (including any subsequent amendments thereto) and circular(s) issued by the SEBI/stock exchange, from time to time.

The Company shall consider the following criteria for determination of materiality of an event/information:

- i. the omission of an event or information, which is likely to result in discontinuity or alteration of an event or information already available publicly; or
- ii. 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;
- iii. the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - a) Two percent of turnover, as per the last audited consolidated financial statements of the Company;
 - b) Two percent of 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;
 - c) Five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company.
- iv. In case where the criteria specified in above clauses (i) to (iii) above are not applicable, an event or information may be treated as being material if in the opinion of the Board of Directors of the Company, the event /information is considered material.

C. 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 accounts, etc. 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 their position and to avoid the establishment of a false market in such securities.

D. Without prejudice to the generality of the above, the Company may make disclosures of event/information as specified by the Board of Directors of the Company, from time to time.

E. The Policy shall be read together with Company Code of Practices and Procedures for fair disclosure of Unpublished Price Sensitive Information formulated under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Disclosures to the Stock Exchanges

Any transaction, event or information relating to the Company that might fall within the Scope, as specified above, is required to be reported immediately by the Relevant Employees of the Company to the below Authorised Personnel(s):

Authorised Personnel(s) : Executive Director – Finance & Control and Chief Financial Officer/ Company Secretary and Compliance Officer

Contact Details :

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