

POLICY ON DISCLOSURE OF MATERIAL EVENTS

Oriental Trimex Limited

1. Preamble

Oriental Trimex Limited is committed to timely, accurate and transparent disclosure of material events and information in order to enable investors and stakeholders to make informed decisions.

This Policy is formulated in accordance with **Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015** and Schedule III thereto, as amended from time to time.

2. Objective

The objectives of this Policy are to:

- Ensure timely disclosure of material events and information
 - Maintain transparency and fairness in communication with stakeholders
 - Comply with SEBI (LODR) Regulations
 - Prevent selective disclosure of material information
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3. Applicability

This Policy applies to:

- The Company
 - Board of Directors
 - Key Managerial Personnel (KMPs)
 - Senior Management
 - All employees involved in decision-making or information flow
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4. Definitions

4.1 Material Event / Information



An event or information shall be considered **material** if:

- Its omission or misstatement is likely to result in discontinuity or alteration of publicly available information, or
- It is likely to significantly affect the market price of the Company's securities, or
- It is required to be disclosed under Regulation 30 and Schedule III of SEBI (LODR).

5. Criteria for Determining Materiality

The Company shall consider the following criteria to determine materiality:

- Impact on financial position or performance
- Impact on operations or business continuity
- Impact on reputation or brand value
- Legal or regulatory implications
- Likely impact on shareholders and investors

6. Events Deemed to be Material

The following events shall be disclosed without application of materiality test, as specified under Schedule III of SEBI (LODR), including but not limited to:

- Acquisition, merger, demerger, restructuring
- Issue or allotment of securities
- Changes in capital structure
- Appointment, resignation or removal of Directors, KMPs or Auditors
- Change in statutory or internal auditors
- Fraud, default or litigation having material impact
- Outcome of Board meetings
- Related party transactions (where applicable)

7. Events Subject to Materiality Assessment

Certain events shall be disclosed based on materiality assessment, including but not limited to:

- Changes in business operations
- Disruption of manufacturing operations
- Significant orders or contracts
- Regulatory actions or notices
- Environmental or safety incidents



8. Authority for Disclosure

- The **Board of Directors** authorizes designated **Key Managerial Personnel** to determine materiality and make disclosures to stock exchanges
- The authorized persons may include:
 - Managing Director / Whole-time Director
 - Chief Financial Officer
 - Company Secretary

9. Timelines for Disclosure

- Material events shall be disclosed to stock exchanges **as soon as reasonably possible**, but not later than the timelines prescribed under SEBI (LODR)
- Continuous disclosure obligations shall be complied with till the event is resolved

10. Method of Disclosure

- Disclosures shall be made to all stock exchanges where the Company's securities are listed
- Information shall also be hosted on the Company's website for the prescribed duration
- Uniform and non-discriminatory disclosure shall be ensured

11. Confidentiality & Prevention of Leakage

- Unpublished Price Sensitive Information (UPSI) shall be handled in accordance with the **Insider Trading Code**
- All employees shall maintain strict confidentiality until official disclosure

12. Review & Monitoring

- The Policy shall be reviewed periodically by the Board
- Effectiveness of disclosures shall be monitored by Compliance Officer / Company Secretary

13. Non-Compliance



- Any failure to comply with this Policy may result in disciplinary action
- Regulatory penalties, if any, shall be borne as per law

14. Policy Review & Amendment

- This Policy shall be amended to align with changes in SEBI regulations or business requirements
- Statutory provisions shall prevail in case of any conflict

For Oriental Trimex Limited

