

# JAY SHREE TEA & INDUSTRIES LIMITED

## Policy for Determining Materiality for Disclosures

### 1. Regulatory Framework

The Securities and Exchange Board of India (“SEBI”), has issued SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 (the “Regulations”). In terms of Regulation 30 read with SEBI’s circular No.CIR/CFD/CMD/4/2015 dated September 9, 2015, Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated 11th July, 2023, Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated 13th July, 2023 and such other Circulars issued by SEBI from time to time, the Board of Directors (the “Board”) of Jay Shree Tea & Industries Limited (the “Company”) has revised and adopted this Policy for determining Materiality for Disclosures (the “Policy”) for determination of materiality of events or information (“Material Information”) to enable the Company to promptly disclose such information or event to the Stock Exchanges, pursuant to this Regulation.

The Policy sets out the guidelines for identification of events or information within the Company which are deemed to be material in the opinion of the Board of Directors and to ensure relevant, correct, sufficient and timely disclosure of material events/ information to the Stock Exchanges and to the public and that all market participants have simultaneous access to any share price sensitive information.

### 2. Objective

The objectives of this Policy are as follows:

- a. To ensure that the Company complies with the disclosure obligations to which it is subject as a publicly-traded company as laid down by the SEBI Listing Regulations, 2015 various Securities Laws and any other legislations, as amended from time to time;
- b. To lay the principles for determining materiality of events/information which require disclosure to the Stock Exchanges where the specified securities of the Company are listed;
- c. To lay the principles for making timely and adequate disclosure of material events/ information so as to enable the investors to take well informed decisions;
- d. To protect the confidentiality of Material / Price sensitive information within the context of the Company’s disclosure obligations;
- e. To ensure uniformity in the Company’s approach towards making disclosures of materiality of events/information.

### 3. Authorised Person

Pursuant to Regulation 30(5), the Board of Directors has authorised Key Managerial Personnel (KMP) of the Company Mr.R.K.Ganeriwala President & Secretary (“Authorised Person”), for the purpose of determining materiality of an event or information and making disclosure to stock exchanges. The Authorised Person shall make required disclosures within the stipulated time of actual occurrence of an event or information, after ascertaining facts.

### 4. Deemed material event or information

Events or information specified in Para A of Part A of Schedule III of the Regulations are required to be disclosed irrespective of application of any quantitative or qualitative materiality thresholds as these are “deemed” to be material.

## 5. Guidelines for Materiality Assessment

The events or information specified in Para B of Part A of Schedule III of the Regulations, which will be disclosed based on application of materiality criteria. Materiality must be determined on a case to case basis depending on the material facts and the circumstances pertaining to the information or event and would be determined based on any of the following criteria:

**a) Quantitative Materiality Thresholds:** would be calculated based on audited consolidated financial statements and would mean the omission of an event/ information whose value involved or the expected impact in terms of value, exceeds the lower of the following:

i) 2% (two percent) of consolidated turnover, as per the last audited consolidated financial statements of the Company; or

ii) 2% (two percent) 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% (five percent) 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.

**b) Qualitative Materiality Criteria:** Where the omission of disclosure of such event or information is likely to result in discontinuity or alteration of event/information already available publicly or result in significant market reaction, if the said omission became public at a later date or any event or information having a significant risk to the reputation of the Company or any other event/information may be treated as being material if in the opinion of the Board of directors of Company, the event/information is considered material.

**c) Board Decision:** any other event/information ought to be disclosed though not required to be statutorily intimated

## 6. Disclosure

The Company will disclose all the material events/information and such other filings as required under the Listing Regulations as per the timelines prescribed thereunder. The Company shall provide such details while making a disclosure of events/information as are mentioned in the circular issued by SEBI along with such other details as may be required by SEBI/the Stock Exchanges from time to time or as may be prescribed under the Listing Regulations. In case the disclosure is made after the timelines specified above of the occurrence of such event/information, the Company shall, along with such disclosure(s) provide an explanation for the delay.

## 7. Website disclosure

As required under the SEBI Regulations, the Policy will be disclosed on the website of the Company [www.jayshreetea.in](http://www.jayshreetea.in). Further, the Company shall disclose on its website all such events or information which have been disclosed to the stock exchange(s) under this Regulation and such disclosure shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company. Any change in the content of its website shall be updated within two working days from the date of such change in content.

## 8. Policy Review

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.