



OSWAL AGRO MILLS LIMITED

POLICY ON DETERMINATION OF MATERIALITY
OF EVENTS

I. BACKGROUND AND APPLICABILITY OF THE POLICY

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) requires every Listed Company to disclose events or information which, in the opinion of the Board of Directors of a Company are material.

In this context, the Policy on Determination of Materiality of Events (“Policy”) has been amended by the Board of Directors (“**Board**”) of Oswal Agro Mills Limited (“**OAML**”/“**Company**”) with the objective of determining materiality of events.

This Policy can be modified and/or amended with the approval of the Board of Directors, from time to time.

II. DEFINITIONS

The words and expressions used but not defined herein shall have the meaning ascribed to such terms in the Companies Act, 2013, Rules made thereunder and/or the Listing Regulations or any statutory modification or re-enactment thereto, as the case may be.

III. MATERIAL EVENTS/ INFORMATION

1. Events/information specified in Para A of Part A of Schedule III of the Listing Regulations shall be deemed to be material events/information and the Company shall make disclosure of such events/information to the stock exchanges.
2. Events/information specified in Para B of Part A of Schedule III of the Listing Regulations shall be considered 'material' basis the criteria specified by SEBI from time to time, presently being the following:
 - a. the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
 - 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. the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - I. two percent of turnover, as per the last audited consolidated financial statements of the Company;
 - II. 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;
 - III. 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.

In case where the criteria specified hereinabove is 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 or information is considered material.

IV. DISCLOSURE

1. Any event/ information purported to be reportable under Regulation 30 of the Listing Regulations shall be informed to the Chairperson/Chief Executive Officer/Whole Time Director/Chief Financial Officer & Company Secretary of the Company on an immediate basis with adequate supporting data/information to facilitate a prompt and appropriate disclosure. Any other event, even if not covered under the Listing Regulations but is potentially of price sensitive nature, must also be informed, for further evaluation, to the Chief Financial Officer & Company Secretary.
2. The Chairperson/Chief Executive Officer/Whole Time Director/Chief Financial Officer & Company Secretary of the Company shall severally be responsible and authorized for ascertaining the materiality of events considering its nature and its disclosure after taking into consideration the various provisions of the Listing Regulations and this policy.
3. After evaluation, any one of the above-mentioned persons shall make disclosure to the Stock Exchanges.
4. The Company shall use the electronic facilities provided by the Stock Exchanges for dissemination of the information and may subsequently disclose the same via other media, including the press release, website, etc.
5. Statutory timeframes for disclosure shall be adhered to. Delay, if any, should be sufficiently explained along with the disclosure.
6. Regular updates, where relevant, shall be made with relevant explanations.
7. All disclosures shall be available on the website of the Company viz. www.oswalagromills.com for a period of 5 years and thereafter as per the Policy of Archival of Documents.

Contact details of Key Managerial Personnel (KMPs) of the Company in compliance with Regulation 30 (5) of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015

Pursuant to the requirements under the Regulations 30(5) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the following Key Managerial Personnel (KMP' s) of our Company are authorized to determine materiality of an event or information and for making disclosures to stock exchange(s):

Name	Designation	Contact details
Mr. Bholu Nath Gupta	Wholetime Director & CEO	Tel. No.: 011-23730325, 0161-2544313, 0161-2544238 Email id: oswal@oswalagromills.com
Mr. Parveen Chopra	Chief Financial Officer	
Mrs. Payal Goel	Company Secretary & Compliance Officer	