



Amir Chand Jagdish Kumar (Exports) Limited

Policy for Determination of Materiality for Disclosure of Information

Effective Date: April 01, 2025





**POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF
INFORMATION
(Regulation 30(4)(ii) of SEBI LODR Regulations)**

A. BACKGROUND

Pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations 2015, as amended including any modifications, clarifications, circulars and re-enactment thereof (“**SEBI LODR Regulations**”), the Board of Directors (“**Board**”) of Amir Chand Jagdish Kumar (Exports) Limited (the “**Company**”) at their meeting held on December 28, 2024 have adopted this Policy on Determination of Materiality for Disclosure of Events and Information (‘**Policy**’).

B. DEFINITIONS

In this Policy, unless the context otherwise requires:—

- a. “**Material Event**” or “**Material Information**” shall mean (a) Such event or information set out in Sections 7.1, 7.3 & 7.4 of this Policy; or (b) Such event or information set out in Section 7.2 as determined to be material in terms of Section 6 of the Policy;
- b. “**Mainstream Media**” shall have the same meaning ascribed under the SEBI LODR Regulations read along with related SEBI Circulars, Notifications, Guidance Note and Industry Standard Note issued by Industry Standards Forums (‘ISF’), as amended from time to time.

All other words and expressions used that are not defined in this Policy, but defined in the SEBI LODR Regulations, as amended from time to time, the SEBI Act, 1992, the Companies Act 2013, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

C. OBJECTIVE OF THE POLICY

The objectives of this Policy are as follows:

- 1. To assist the Authorised Persons identified by the Board of Directors for the purpose of determining materiality of an event or information and for the purpose of making disclosures to the stock exchange(s) where the securities of the Company are listed.
- 2. 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 Listing Regulations, various Securities Laws and any other applicable legislations (in India or Overseas)
- 3. To ensure uniformity in the Company’s approach to disclosures, raise awareness and reduce the risk of selective disclosures.



D. APPLICABILITY

This Policy shall be applicable throughout the Company. All events and/or information which are required to be disclosed by the Company in terms of Para B of Part A of Schedule III of the SEBI LODR Regulations shall be subject to the criteria of materiality as provided in this Policy. Any other events/ information viz. any 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 information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities.

E. PERSONS RESPONSIBLE FOR DISCLOSURE

The Board have authorised the Key Managerial Personnel (“**Authorized Person**”) to determine the materiality of an event or information and to make appropriate disclosure to the stock exchanges as also on the Company’s website on a timely basis. The Authorised Persons are also empowered:

- a. To seek appropriate counsel or guidance, as and when necessary, from other internal or external stakeholders as they may deem fit.
- b. To call for information from all its internal stakeholders including its Subsidiaries and Promoters.

The Authorized Person(s) shall have the following responsibilities for determining the material events or information:

- a. To put in place an adequate mechanism for collecting relevant information and events on a real time basis, to the extent possible, to enable appropriate disclosures under this Policy. The mechanism should include the responsibility of all internal stakeholders to report all events and information as covered in section 7 of this Policy.
- b. To review and assess an event or information that may qualify as ‘material’ and may require disclosure, on the basis of facts and circumstances prevailing at a given point in time.
- c. To disclose developments that are material in nature on a regular basis, till such time the event or information is resolved/closed, with relevant explanations.
- d. To consider such other events or information that may require disclosure to be made to the stock exchanges which are not explicitly defined in the SEBI LODR Regulations and determine the materiality, appropriate time and contents of disclosure for such event or information.
- e. To provide specific and adequate reply to all queries raised by the stock exchanges with respect to any events or information.

F. CRITERIA FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION

- 1. As per Regulation 30 of the SEBI LODR Regulations, the Company is required to make disclosure of certain events/ information specified in Para A of Part A of Schedule III to the Stock Exchanges without any application of the guidelines for materiality. However, events/ information specified in Para B of Part A of Schedule III to the SEBI LODR Regulations are to be disclosed only if they meet the criteria of Materiality.



2. The Company shall consider an event/ information as material if it meets any of the following criteria specified in Regulation 30 (4) (i) of the SEBI LODR Regulations:
 - 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 stock market reaction if the said omission came to light at a later date; or
 - 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 (2%) of turnover, as per the last audited consolidated financial statements of the Company; (ii) two percent (2%) 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 (5%) of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company;
3. In case where the criteria specified in sub-sections (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the Authorised Person or the Board of Directors of the Company, the event or information is considered material.

G. MATERIAL EVENTS/ INFORMATION

1. The Company shall make disclosure of the events and/or information specified in Para A of Part A of Schedule III to the SEBI LODR Regulations upon their occurrence to the Stock Exchanges without any application of the guidelines for materiality.
2. The Company shall make disclosure of the events and/or information specified in Para B of Part A of Schedule III to the SEBI LODR Regulations upon their occurrence to the Stock Exchanges after following the procedural guidelines as given in Section 8 of this Policy.
3. The Company shall also make disclosure of any other events/ information 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 apprise its position and to avoid the establishment of a false market in such securities.
4. Without prejudice to the above, the Company may make disclosures of event/information as specified by SEBI from time to time.
5. In case of any amendments/ update in the list of events/ information specified in Part A of Schedule III or Part B of Schedule III of the SEBI LODR Regulations, the above list of material information/ events shall stand accordingly modified.



6. The Company shall confirm, deny or clarify, upon material price movement in the scrip of the Company (as per the framework issued by the SEBI/ Stock Exchanges as amended from time to time), any reported event/ information in the mainstream media which is not general in nature and which indicates that rumour of an impending specific event/ information is circulating amongst the investing public and also provide the current stage of such event or information. Such disclosure will be made within the timelines prescribed under the SEBI LODR Regulations, circulars/ notifications issued by SEBI/ stock exchanges in this regard and in accordance with the Industry Standard Note ('ISN') on verification of market rumours issued by ISF, under Regulation 30(11) of the SEBI LODR Regulations, as amended from time-to-time.
 - a. Pursuant to the aforesaid ISN issued by ISF, the Company shall be deemed to have material business operations in the foreign jurisdiction, where the material subsidiaries of the Company are situated. For this purpose, material subsidiary shall have the same meaning as provided in Regulation 16(1)(c) of the SEBI LODR Regulations, as amended from time to time.
 - b. The Key Managerial Personnel of the Company shall identify the list of foreign business/financial news sources for tracking rumour publication for the purpose of compliance with the provisions of Regulation 30(11) of SEBI LODR Regulations in respect of events or information published in international media. For this purpose, "International Media" shall include the news sources as prescribed under the ISN issued by ISF and as amended from time to time.

H. PROCEDURE FOR DISCLOSURE OF EVENTS/ INFORMATION

1. The Board of Directors of the Company has already adopted the Code of Fair Disclosure which provides the practices and procedures for fair disclosure of unpublished price sensitive information. The same shall be used for disclosure of material events/ information under Regulation 30 of the SEBI LODR Regulations.
2. The Company shall disclose all events or information within the timelines as specified in the SEBI LODR Regulations. Provided that disclosure with respect to events or information for which timelines have been specified in Part A of Schedule III shall be made within such timelines. Provided further that in case the disclosure is made after the timelines specified under this regulation, the Company shall, along with such disclosure provide the explanation for the delay.
3. The Authorised person prior to the submission to the Stock Exchanges incorporate all requisite details set out in SEBI circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023 and any subsequent amendments in this regards.

I. EFFECTIVE DATE

The Policy as approved by the Board of Directors shall be effective from April 01, 2025. In the event of any conflict between the terms of this Policy and the SEBI LODR Regulations (as amended) by the SEBI LODR Regulations or any other amendments thereafter, the provisions of the SEBI LODR Regulations shall prevail.



J. WEBSITE

As per the provisions of the SEBI LODR Regulations, the Policy shall be disclosed on the website of the Company and the Stock Exchanges on which the Company's securities are listed. Further, the Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under the SEBI LODR Regulations and such disclosures shall be made available on the website of the Company for a period of five years and thereafter as per the archival policy of the Company.

K. CONTACT DETAILS

Queries or clarifications about the policy or disclosures made by the Company should be referred to the Company Secretary as under:

Name: Mrs. Sadhana Khuarana

Designation: Company Secretary & Compliance Officer

Email Id: cs@aeroplanerice.com

Contact No: 85959 12447

Version approved by: The Board of Directors

Effective Date: April 01, 2025

Last modified date: --