

## **POLICY ON DISCLOSURE OF MATERIAL EVENTS**

### **1. Objective**

The objective of the Policy is to ensure timely and adequate disclosure of material events and price sensitive information under Regulation 30 of the Securities and Exchange Board of India (listing obligation and disclosure requirements) Regulation 2015 by Sterling Tools Limited ("the Company").

### **2. Scope:**

Information relating to material events and which is price sensitive in nature, shall be promptly disseminated to the Stock Exchanges. For this purpose, material event means any information which relates to a Company and which, if published is likely to materially affect the price of shares of the Company.

As per the present Regulation 30, the Company shall disclose to the Stock Exchanges where it is Listed, the following types of material events:

- a. Events such as strikes, lock-outs, closure on account of power cuts, etc.
- b. Change in the general character or nature of business
- c. Disruption of operations due to natural calamity
- d. Commencement of Commercial Production / Commercial Operations.
- e. Developments with respect to pricing / realization arising out of change in regulatory framework.
- f. Litigation /dispute with a material impact.
- g. Revision in Ratings
- h. Any other information having bearing on the operations / performance of the Listed Equity as well as Price Sensitive Information, such as :-
  1. Periodical Financial Results of the Company
  2. Intended declaration of Dividend (both Interim and final)
  3. Issue of Securities, forfeiture or buy back of Securities
  4. Any major expansion or execution of new projects
  5. Amalgamation, Mergers or Takeovers
  6. Disposal of the whole or substantial part of the undertaking
  7. Change in Directors, Key Managerial Personnels, Auditors
  8. Fraud/Default by promoters or Key Managerial Personnels
  9. Amendment in Memorandum and Articles of Association
  10. Corporate debt restructure
  11. Reference to BIFR and winding up petition
  12. Issue of Notice, Call letters etc. to Shareholders
  13. Proceeding of Annual General and Extra Ordinary General Meeting
  14. Any Agreements with media Companies



15. Action pursuant to regulatory/statutory amendment that is material to the operation of the Company
16. Details of litigation/disputes/agreements that have a material impact on the functioning of the Company.

**3. Prompt Disclosure of material events and Price Sensitive Information:**

Information of material events and Price sensitive information shall be given by the Company to Stock Exchanges and disseminated on a continuous and immediate basis, so that present and potential investors are able to take informed decision with respect to their investment in the Company.

**4. Authorisation for disclosures:**

**The Key Managerial Personnel (KMP) are authorized to determine the materiality of an event and to decide:**

- i. The event that qualifies for disclosure as per Regulation 30 of the Securities and Exchange Board of India (listing obligation and disclosure requirements) Regulation 2015.
- ii. The appropriate time at which such disclosure is to be filed with the Exchange.
- iii. The details that may be filed in the best interest of present and potential investors.

**All such disclosures shall be signed by the Managing Director or Chief Financial Officer or Company Secretary.**

**5. Posting of information on Corporate website:**

Such aforesaid information shall also be posted on the Corporate website and shall be hosted for 5 years.