

POLICY FOR DETERMINATION OF MATERIAL EVENTS AND INFORMATION

Policy No:	SSLL/05
Issue Date:	01.12.2015
Revision No:	02
Revision Date:	10.08.2023

PREAMBLE:

This Policy for Determination of Material Events and Information is framed in line with Regulation 30 of the Securities and Exchange Board of India's (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred as "SEBI LODR").

OBJECTIVE:

The purpose of this Policy is to determine materiality of events and information, based on specified criteria, so that the Company makes timely disclosure of events / information specified in Para 'A' and 'B' of Part 'A' of Schedule III of the SEBI LODR and disseminate such information on its website.

The Policy thus aims at providing equal access to investors to important information or disclosures which may affect their investment decisions and in formulating the principles of materiality based on which the Company shall make disclosures of events or information.

This Policy will be effective from 1st December 2015 and has been amended by the Board of Directors of the Company at their meeting held on 10th August 2023.

A. MATERIALITY ASSESSMENT AND DISCLOSURE REQUIREMENT

1. The events as specified in Para (A) of Part A of Schedule III of the SEBI LODR shall be disclosed irrespective of Materiality.
2. The events as specified in Para (B) of Part A of Schedule III of the SEBI LODR shall be disclosed on application of the guidelines for Materiality.
3. The Company shall make disclosure of events specified in Para (B) of Part A of Schedule III of the SEBI LODR or any other event, based on application of the guidelines for materiality as specified hereinafter.

4. The Company shall consider the following criteria for determination of materiality of events/information:
 - i. The omission of an event or information, which is likely to result in discontinuity or alteration of an event or information already available publicly; or
 - ii. The omission of an event or information, which is likely to result in significant market reaction if the said omission came to light at a later date; or
 - iii. The omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - a) two percent (2%) of turnover, as per the last audited consolidated financial statements of the Company;
 - b) 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;
 - c) 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.
5. In case where the criteria specified in sub-clauses (i), (ii) and (iii) above are 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 / information is considered Material.

B. AUTHORISATION FOR DISCLOSURE OF EVENTS OR INFORMATION:

The following officials shall be severally authorized to determine the materiality of an event or information and for the purpose of making disclosure to the stock exchanges under the SEBI LODR:

1. Managing Director / Executive Director
2. Chief Financial Officer
3. Company Secretary

Contact details:

Email Id: compliance.ssl@transworld.com

Telephone no: 022-68110300

6. The event or information specified in Para (A) and Para (B) of Part A of Schedule III of the SEBI LODR shall be promptly informed by the Senior Management Personnel of the Company with adequate supporting data/information to facilitate an appropriate disclosure to the stock exchanges within the timelines specified in SEBI LODR.

C. CONTINUOUS DISCLOSURES:

The Company shall, with respect to the disclosures referred to in this Policy, make disclosures updating material developments on a regular basis, till such time the event is resolved or closed, with relevant explanations.

D. WEBSITE UPDATION / UPDATES TO STOCK EXCHANGE:

As prescribed under Regulation 30(8) of the SEBI LODR, the Company shall disclose on its website all such events or information which has been disclosed to the Stock Exchange under SEBI LODR and such disclosures 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 as disclosed on its website.

E. LIMITATION AND AMENDMENTS:

In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.
