



RANA SUGARS LIMITED

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POLICY ON DETERMINING MATERIALITY OF EVENTS **[UNDER REGULATION 30(4)(II) OF SEBI (LISTING OBLIGATIONS AND DISCLOSURE** **REQUIREMENTS), REGULATIONS 2015**

OBJECTIVE

Rana Sugars Limited is committed to being open and transparent with all stakeholders and in disseminating information in a fair and timely manner. The Company's securities are listed on the BSE Limited (BSE) and National Stock Exchange (NSE). The Company will comply with the continuous disclosure obligations as mandated by the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 (Listing Regulations).

In terms of Regulation 30 of the Securities and Exchange(s) Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), the Board of Directors (the "Board") of Rana Sugars Limited (the "Company") has adopted this Policy for determination of material events and information ("Material Information") to be disclosed to the Stock Exchange(s) and archival thereof under applicable SEBI regulations ("Policies").

The objectives of this Policy are as follows:

- a. To ensure that the Company complies with the disclosure obligations to which it is subject to, as a publicly-traded company as laid down by the Listing Regulations.
- b. To ensure that the information is disclosed by the Company in a timely manner as prescribed under relevant law/regulation.
- c. To ensure that corporate documents and public statements are accurate and do not contain any misrepresentation.
- d. To protect the confidentiality of Material/ Price sensitive information within the context of the Company's disclosure obligations.

DEFINITIONS

In this policy unless the context otherwise requires:

- "Act" means the Companies Act, 2013 and rules made thereunder, as amended from time to time.
- "Board" or "Board of Directors" shall mean the Board of Directors of Rana Sugars Limited, as may be re-constituted from time to time.
- "Company" means Rana Sugars Limited.
- "Financial Year" shall have the same meaning prescribed to it under the Act.
- "Key Managerial Personnel" or "KMP" shall have the same meaning prescribed to it under the Act.
- "Material Information/ event" shall mean information/ events as mentioned under clause IV and V of this Policy.
- "SEBI Regulations" or "Listing Regulations" shall mean Securities and Exchange(s) Board

of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as may be amended from time to time.

The words and expressions used which are not defined in this Policy, but defined in the SEBI Act, 1992, Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and other applicable Laws, 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.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

AUTHORIZED PERSONS FOR MATERIAL EVENTS

- i. The materiality or otherwise of an information or event in terms of SEBI Regulations will be determined jointly by the Chief Financial Officer and Company Secretary (“Authorized Persons”) in consultation with Managing Director.
- ii. The Authorized Persons will also decide the appropriate period/ stage at which disclosure is to be filed with the stock exchanges including details that may be filed.
- iii. Contact details of the Authorized Persons are given on the website of the Company viz, www.ranasugars.com.

MATERIAL EVENTS ARE DIVIDED INTO TWO PARTS

- i. Events which shall be disclosed without any application of the guidelines for materiality pursuant to Para A of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Master Circular SEBI/HO/CFD/PoD2/CIR/P/2023/120
- ii. The Events which shall be disclosed upon application of the guidelines for materiality pursuant to Para B of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Master Circular SEBI/HO/CFD/PoD2/CIR/P/2023/120

GUIDELINES FOR DETERMINING MATERIALITY OF AN EVENT/ INFORMATION SPECIFIED IN SUB-REGULATION 4 OF REGULATION 30 OF SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015

1. Materiality will be determined on a case to case basis depending on specific facts and circumstances relating to the information/ event. In order to determine whether a particular event/information is material in nature, ‘quantitative’ criteria will be applied.
2. 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
3. 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 of turnover, as per the last audited consolidated financial statements of the listed entity
 - b) two percent of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;
 - c) 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 listed entity;

In case where the criteria specified in sub-clauses (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the

listed entity, the event or information is considered material.

TIMELINES FOR DISCLOSURE OF INFORMATION TO STOCK EXCHANGE(S)

- a) The Company shall disclose to stock exchange(s) of all events or information, as specified in Schedule III Part-A of SEBI (Listing Obligation and Disclosures Requirements) Regulations, 2015 as soon as reasonably possible as specified in Master Circular SEBI/HO/CFD/PoD2/CIR/P/2023/120.

Provided that in certain unavoidable circumstances or due to confidentiality of information, the Company might delay in disclosing the material event/ information to the stock exchange(s), in that case the disclosure regarding delay in disclosing the material event/ information along with the reasonable explanation and clarification will be disseminated to the stockexchange(s).

- b) The Company shall disclose all events or information with respect to subsidiaries, if any, which are material for the Holding Company to the stock exchange(s), not later than twenty-four hours from the occurrence of event or information.
- c) The Company shall, with respect to disclosures referred to in the regulation 30 of Listing Regulations, make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.

ARCHIVAL OF DISCLOSURES

1. The Company shall also host all disclosures pursuant to this policy on its website viz., www.ranasugars.com.
2. Such disclosures shall be displayed on the website of the Company for a period of five years from the date of its hosting. The disclosures which are more than five years old will be archived from the website of the Company and will be dealt in an appropriate manner as decided by the Authorized Person(s) from time to time.

STATUTORY FRAMEWORK

1. This policy is framed in terms of the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
2. Where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time this policy is changed to conform to the law, rule, regulation or standard.

The Policy is subject to review by the Board from time to time. The revised policy shall be effective from 29th May, 2024