

**DETERMINATION OF MATERIALITY
OF
EVENT OR INFORMATION
POLICY**

INTRODUCTION

This Policy for Determination of Materiality of Events or Information is aimed at providing guidelines to the management of TBI Corn Limited (“The Company”), to determine the materiality of events or information, which could affect investment decisions and ensure timely and adequate dissemination of information to the Stock Exchange(s) (as hereinafter defined).

This Policy has been formulated in accordance with and without diluting the requirements under the current guidelines laid down by Securities Exchange Board of India (‘SEBI’) under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (‘Listing Regulations’), as amended from time to time, with respect to determination of materiality of events and information and disclosure thereof.

OBJECTIVES

The Company has to ensure prompt disclosure of material price sensitive information/ event to the stock exchange(s), where the securities of the Company are listed, so that present and potential investors are able to take informed decision relating to their investment in the Company and to avoid creation of false market in the securities of the Company. This Policy shall act as a guidance for determining materiality of such price sensitive information

SCOPE AND LIMITATION

In the event of any conflict between the provisions of this Policy and Listing Regulations or any other statutory enactments or rules, the provisions of Listing Regulations or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

DEFINITIONS

“Act” means the Companies Act, 2013.

“Board of Directors” means the Board of Directors of the Company.

“Company” means TBI Corn Limited.

“Key Managerial Personnel” means key managerial personnel as defined under sub-section (51) of section 2 of the Companies Act, 2013.

“Listing Regulations” means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.

“Policy” means this Policy for Determination of Materiality of Events or Information, as amended from time to time.

“SEBI” means the Securities and Exchange Board of India.

“Relevant employees” means senior management of the Company including head of departments.

“Rules” means the rules made under the Companies Act, 2013.

“Stock Exchange(s)” means NSE Limited where the equity shares of the Company are listed.

“undertaking” shall mean an undertaking in which the investment of the company exceeds twenty per cent. of its net worth as per the audited balance sheet of the preceding financial year or an undertaking which generates twenty per cent. of the total income of the company during the previous financial year;

“substantially the whole of the undertaking” in any financial year shall mean twenty per cent or more of the value of the undertaking as per the audited balance sheet of the preceding financial year;

GUIDELINE ON OCCURRENCE OF AN EVENT/ INFORMATION

The occurrence of material event/information would be either by the Company's own accord or not in the hands of the Company. It can be categorized as under:

- depends upon the stage of discussion, negotiation or approval; and
- in case of natural calamities, disruptions etc., it would depend upon the timing when the Company became aware of the event/information.

In respect of the events under 6(a), the events/information can be said to have occurred upon receipt of approval of Board of Directors and in certain events after receipt of approval of both. Board of Directors and shareholders.

However, considering the price sensitivity involved, for certain events e.g. decision on declaration of dividends etc., disclosure shall be made on receipt of approval of the event by the Board of Directors, pending shareholder's approval.

In respect of the events under 6(b), the events/information can be said to have occurred when the Company becomes aware of the events/information, or as soon as, an officer of the entity has, or ought to have reasonably come into possession of the information in the course of the performance of his duties. The term 'officer' shall have the same meaning as defined under the Act and shall also include the Promoter of the company.

ROLES AND RESPONSIBILITIES

The following key managerial personnel of the Company, the Managing Director, Chief Financial Officer and Company Secretary, are the "Authorised Persons" for purposes of determining materiality of an event or information as per the guidelines in this Policy and the Regulations, and for purposes of disclosing to relevant stock exchanges.

Relevant employees of the Company shall identify any potential material event or information and report the same to the authorized Key Managerial Personnel, for determining the materiality of the said event or information and for making the necessary disclosures to the stock exchange(s).

DISCLOSURE ON WEBSITE

A copy of the policy including amendments thereto shall be hosted on the website of the Company.