

ANDHRA PRADESH TANNERIES LIMITED

POLICY ON CRITERIA FOR DETERMINING MATERIALITY OF EVENTS

1. PREAMBLE:

The Policy is framed in accordance with the requirements of the Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations).

2. EFFECTIVE DATE :

The Policy as approved by the Board of Directors shall be effective from December 1, 2015.

3. OBJECTIVE OF THE POLICY :

The objectives of this Policy are as follows:

- a) 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 legislations.
- b) To ensure that the information disclosed by the Company is timely and transparent.
- 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.
- e) To provide a framework that supports and fosters confidence in the quality and integrity of information released by the Company.
- f) To ensure uniformity in the Company's approach to disclosures, raise awareness and reduce the risk of selective disclosures.

4. GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION :

The Company shall determine the materiality of an event / information for the purpose of disclosure to Stock Exchanges by applying the following criterion:

- (a) That event or information is, in any manner, unpublished price sensitive information;
- (b) The omission of disclosure of its is likely to result in discontinuity or alteration of event or information already available publicly;
- (c) The omission of its disclosure is likely to result in significant market reaction if the said omission came to light at a later date; and
- (d) Events or information not covered by above, but it is considered as being material in the opinion of the Board of Directors of the Company.

5. DISCLOSURES OF EVENTS OR INFORMATION:

A) The Company shall make disclosure of such events or information as soon as reasonably possible and not later than twenty-four (24) hours from the occurrence of such event or information in the following manner:

- i) Inform the stock exchanges on which the securities of the Company are listed;
- ii) Upload on the corporate website of the Company.

Provided that in case the disclosure is made after twenty-four (24) hours of occurrence of such event or information, the Company shall along with such disclosure(s) provide an explanation for the delay.

6. POLICY REVIEW:

The Authorized Persons may review the Policy from time to time. If any inconsistency arises between the terms of the Policy and the Listing Regulations, the provisions of the Listing Regulations shall prevail.