



SANGAL PAPERS LIMITED

CIN- L21015UP1980PLC005138

Reg. Office: 22 Km, Meerut-Mawana Road, Mawana, Meerut,
UP-250401

POLICY ON DISCLOSURE OF MATERIAL EVENTS

1. Objective:- In terms of Rule 30 of sub-clause (4) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with the stock exchanges and guidance note issued in this regard, the Board of Directors (the "Board") of Sangal Papers Limited (CIN-L21015UP1980PLC005138) ("the Company") has adopted this policy by the Company, for determination of material and price sensitive information ("Material Information") so that such information can be promptly disclosed to the stock exchanges, as per the prescribed regulations.

2. Policy:- An Operating Committee, comprising of the Managing Director, the Chief Financial Officer, Whole time Director and the Company Secretary of the Company, shall be the authority to determine the materiality of any information, classify it as a Material Information, decide the appropriate time at which disclosure is to be filed with the stock exchanges and details that may be filed in the best interest of present and potential investors.

Certain information would be per se Material Information as per Rule 30 of sub-clause (4) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

1. Material Change in the General Character of Business (on account of technical, manufacturing, marketing or financial – tie- up, new line of business, enlarging, restricting or closing of operations, selling/disposal or agreeing thereto by the Company or by any of its subsidiaries.
2. Material disruption of operations due to natural calamity
3. Disruption of operations of any one or more units or division or subsidiary of the listed entity due to events such as strikes, lockouts etc.
4. Material commencement, postponement or closure of commenced commercial operations/services.
5. Material change in pricing /realization/profitability on account of change in the regulatory framework.
6. Litigation/dispute/regulatory action having/likely to have material impact on the Company's future operations, profitability or financials (if making of such disclosure is not in the interest of the Company, disclosure may be limited to the extent of stating the occurrence of the event).
7. Revision in Ratings.
8. Material capacity addition or material product launch
9. Awarding, bagging/receiving, amendment or termination of awarded/bagged material order(s)/contract(s).
10. Material Agreements which are binding and revision(s) or amendment(s) or termination(s) thereof (including material loan agreements).
11. In case of listed subsidiaries, material event(s)/information, disseminated to the stock exchange by the respective subsidiary, the company shall inform impact of such event(s)/information on the operations or performance, if any of the Company.
12. Material event(s)/information/transaction(s) or arrangement(s) with respect to the unlisted subsidiaries.
13. Issue of depository receipts (ADR/GDR) or FCCB
14. Cancellation of dividend /rights/bonus, etc.
15. Material frauds/defaults etc. by directors, employees, agents of the Company
16. Change in directors, key managerial personnel and auditors
17. Grant, withdrawal, surrender , cancellation or suspension of key licenses or regulatory approvals
18. Corporate debt restructuring
19. One time settlement having material impact on the profitability of the Company

20. Amendments to memorandum and articles of association of listed entity;

21. Any other major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents etc.

22. Any other information, which is exclusively known to the Company, which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of false market in the securities of the Company.

❖ Other matter

1. Outcome of meeting(s) of the board of directors, within 30 minutes of the closure of the meeting, held to consider or decide on the following :

a) Dividends and/or cash bonuses recommended or declared or the decision to pass any dividend along with the date on which dividend shall be paid/dispatched;

b) The decision on Buyback of securities;

c) The decision with respect to fund raising proposed to be undertaken;

d) Increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares would be credited/dispatched;

e) Reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to;

f) Short particulars of any other alterations of capital, including calls;

g) Issue of any class of securities or change in terms/structure of existing securities

h) Financial results

i) Acquisition, Merger, De-merger, Amalgamation, Restructuring, Scheme of Arrangement, Spin off or selling divisions of the Listed Entity, Delisting, Redemption/ Cancellation/Retirement of any securities issued by 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. In any circumstance 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 these policies and procedures until such time as this policy is changed to conform to the law, rule, regulation or standard.