



ASM TECHNOLOGIES LIMITED

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

(Amended and effective April 1, 2023)

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1. Preamble:

In terms of Regulation 30 read with Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR” or “Listing Regulation”), the Board of Directors (the “Board”) of ASM Technologies Limited (the “Company”) has adopted this Policy for determination of material events and information (“Material Information”) to be disclosed to the Stock Exchanges.

2. Scope and Objectives

This Policy is applicable to the Company. This policy lay down guiding principles for the management to identify events or information which need to be reported under this Policy and simultaneously ensure that such events and information are put in the public domain in time with adequate disclosures.

This policy enables the investors to take well-informed decisions for investment, disclosure of timely Material Information is essential to ensure compliance of the Regulation in both letter and spirit of law.

3. Criteria for determining materiality of events/information:

The listed entity shall consider the following criteria for determination of materiality of events/ information:

1. The omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
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. In case where the criteria specified above are not applicable, an event/information may be treated as being material if in the opinion of the board of directors of listed entity, the event / information is considered material.

Materiality for disclosure to Stock Exchanges 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, a ‘quantitative’ test can be applied.

In circumstances where ‘quantitative’ test may not be applicable or cannot be applied, a ‘qualitative’ or a ‘subjective’ criteria as mentioned above will be applied to determine materiality:

In determining materiality, a direct and reasonably perceivable (not remote) impact should be considered besides other factors such as the nature of the information (both quantitative and qualitative), prevailing market conditions, general business practices, industry scenario, business outlook etc.

In case of natural calamities, disruptions etc. the events/ information can be said to have occurred when the Company becomes aware of the information. In matters which would depend on the stage of discussion, negotiation or approval, the events/information can be said to have occurred upon receipt of approval by the Board of Directors or after receipt of approval of the Board of Directors and shareholders, as the case may be.

The Company will first disclose to the Stock Exchanges events or information concerning the business and affairs of the Company considered as material except where prohibited by law or when otherwise required for the purpose of maintaining the confidentiality of the information.

4. Authorized person:

The materiality or otherwise of an information or event in terms of Listing Regulation, shall be determined by Chief Financial Officer and or the Company Secretary/Compliance officer of the Company (“Authorized Persons”) in consultation with the concerned Department head, or the responsible Senior Management Personnel, as the case may be.

The Authorized Persons will also decide the appropriate period/stage at which disclosure is to be filed with the stock exchanges and details that may be filed.

The Authorized Persons will ascertain the materiality of such event or information based on the guidelines contained under this policy. On completion of the assessment, the Authorized Persons shall make appropriate disclosure(s) to the Stock Exchanges.

The contact details of the officers authorised to determine materiality of events or to inform the same to Stock Exchange under this Policy are as follows:

Sr. No.	Name of Authorized Person	Purpose	Contact details
1.	Vanishree Kulkarni (Determining materiality	Vanishree.kulkarni@asm ltd.com

	Company Secretary/ Narsingh Rathod (Chief Financial Officer)	of an event or information and for making disclosures to the stock exchange	nlrathod@asmtd.com Ph No. +91-80-66962300/01/02
2.	Vanishree Kulkarni (Company Secretary)	Making disclosures to the stock exchange	Vanishree.kulkarni@asmtd.com Ph No. +91-80-66962300/01/02

No media / public announcement/ publication shall be made by or on behalf of the Company of, or related to, a material event or information until after the same has been first approved by the Authorized Persons.

5. Timelines for Disclosure:

- ❖ The events or information specified in Para A of Part A of Schedule III of the LODR will be disclosed without the application of any materiality thresholds, as these are “deemed” to be material events.
- ❖ The events or information specified in Para B of Part A of Schedule III of the LODR will be disclosed based on application of the materiality criteria, as laid out in the Policy subject to the compliance with the LODR.
- ❖ The events or information specified in Para C and Para D of Part A of Schedule III of the LODR will be disclosed as required by the Regulations.
- ❖ In addition to the above, the Company may make disclosures of event/information as specified by the SEBI, Stock exchanges or Board of Directors of the Company from time to time and information or events including and but not restricted to the following:
 - a. major developments that are likely to affect business;
 - b. any change in accounting policies that may have a significant impact on the accounts of the Company;
 - c. 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 a false market in such securities.
- ❖ The listed entity shall first disclose to stock exchange of all events or information, as specified, as soon as reasonably possible and not later than such time mentioned in the LODR from the occurrence of event or information.

6. Hosting of information on the website of the Company

The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange according to the Listing Regulations, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

7. Review and amendments:

Any subsequent amendment/modification in the Act or the Rules framed thereunder or the SEBI Listing Regulation and/or any other laws in this regard the statutes would prevail over the Policy and shall automatically apply to this Policy. Any change(s) in the Policy shall be approved by the Board of Directors of the Company and Board of Directors reserves its right to amend or modify the policy in whole or in part, at any time without assigning any reason whatsoever.

Note: This policy has been approved by the Board of Directors of the Company at their meeting held on 8th February 2023 and shall be effective from 1st April 2023.