

HINDUSTAN TIN WORKS LIMITED

POLICY FOR DETERMINATION OF MATERIAL EVENTS

INTRODUCTION

In terms of Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), every Company which has listed its 'Specified Securities' (as defined hereinafter) is required to frame a policy for determining materiality of event or information and accordingly is required to make disclosure of such material events based on the policy. In Compliance with the said requirements of Listing Regulations, the Board of Directors of Hindustan Tin Works Limited has framed this policy for determination of material events.

OBJECTIVE

The objective of this policy is to define the parameters/criteria on achieving of which a particular event/ information of the nature specified in Para B of Part A of Schedule III to the Listing Regulations would be considered as material and warrant disclosure in terms of Regulation 30(3) of the Listing Regulations.

DEFINITIONS

'**Board of Directors**' or the '**Board**' means the Board of Directors of the Company as constituted from time to time.

Company: "Company" means Hindustan Tin Works Limited.

'**Listing Regulations**' means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

'**Material Events**' means events of the nature as specified in Para B of Part A of Schedule III which are deemed to be material based on the application of this policy.

'**Policy**' means this policy for Determination of Material Events.

'**Specified Securities**' means 'equity shares' and 'convertible securities' as defined under clause (zj) of sub regulation (1) of Regulation 2 of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009.

POLICY FOR DETERMINING MATERIAL EVENTS

An event/ information of the below mentioned nature and is listed in Para B of Part A of Schedule III of Listing Regulations shall be considered as a Material Event in case of fulfilling of criterion as specified against it.

S.No.	Events	Criterion for determining Materiality
1.	Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.	N.A. If the likely operations would exceed 10% of the turnover of the Company as per the latest audited annual financial statements
2.	Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of	If the likely change exceeds 10% of the turnover of the Company as per the latest audited annual financial

	operations of any unit/division (entirety or piecemeal).	statements
3.	Capacity addition or product launch. (Note: Since the Company is Customers' orders based manufacturing Company, so the question of its product launch doest not arise.)	If the capacity addition would results in increase of turnover by 10% as per the latest audited financial statements.
4.	Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.	If the value order/ contract exceeds 10% of the turnover of the Company as per the latest audited annual financial statements.
5.	Agreements (viz. loan agreement(s) (as a borrower) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.	If the value of such agreement exceeds 10% of the turnover of the Company as per the latest audited annual financial statements.
6.	Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.	If the operations are likely to be disrupted for a period more than 90 days and the likely impact of such disruption exceeds 10% of turnover as per the latest audited annual financial statements.
7.	Effect(s) arising out of change in the regulatory framework applicable to the listed entity	If the likely impact of change exceeds 10% of the turnover of the Company as per the latest audited annual financial statements
8.	Litigation(s) / dispute(s) / regulatory action(s) with impact.	If the claim under litigation exceeds 10% of the turnover of the Company as per the latest audited annual financial statements
9.	Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.	If the impact of such fraud/ defaults exceeds 10% of the turnover of the Company as per the latest audited annual financial statements
10.	Options to purchase securities including any ESOP/ESPS Scheme.	If the option entails creation of equity shares exceeding 1% of the total equity shares as on the date of passing Board Resolution.
11.	Giving of guarantees or indemnity or becoming a surety for any third party.	If the value of such guarantees or indemnity or surety exceeds 10% of the turnover of the Company as per the latest audited annual financial statements
12.	Granting, withdrawal , surrender , cancellation or suspension of key licenses or regulatory approvals.	If the impact of such approvals exceeds 10% of the turnover of the Company as per the latest audited annual financial statements

DISCLOSURES OF MATERIAL EVENTS

The Company shall disclose all the material events first to the Stock Exchange(s) as soon as reasonably possible and not later than 24 hours from the occurrence of such events, including their updates, if any. In the event of the Company fails to make the disclosure within the said period, the Company shall also provide an explanation for such delay.

All disclosures made under this policy shall be hosted on the website of the Company for a minimum period of 5 years and thereafter as per the policy of the Company.

AUTHORIZATION FOR DISCLOSURE

Following Key Managerial Personnel are authorized for the purpose of determining materiality of an event based on the criteria stated in this policy and for purpose of making disclosure to the Stock Exchanges.

1. The Managing Director, or
2. The Company Secretary, or
3. The Chief Financial Officer.

DISCLOSURE

This Policy will be disclosed on the Company's website.
