



THIRUMALAI CHEMICALS LIMITED

MATERIAL DISCLOSURE POLICY

Policy for disclosure determined based on criteria based on criteria of materiality of events/information as required under Reg. 30 (4)(ii) of the Listing Obligation.

The Board framed the Policy for disclosure determined based on criteria of materiality of events/information as required under Reg.30(4)(ii) of the Listing Obligation and are as below.

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. To make disclosures of unpublished price sensitive information as and when, in a universal and uniform manner through forums like widely circulated media and / or through stock exchanges where its equity shares are listed. Selective disclosure of unpublished price sensitive information is to be avoided.
3. To determined materiality on a case to case basis depending on the material facts and the circumstances pertaining to the information or event and would be determined based on the qualitative judgement to be exercised by the Relevant Employee.
4. The following criteria will be applicable for determination of materiality of event or information:
 - i. The omission of an event or information which is likely to:
 - a. result in a discontinuity or alteration of an event already available publicly; or
 - b. result in significant market reaction if the said omission came to light at a later date;
 - ii. Any event or information having a significant risk to the reputation of the Company.
 - iii. the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - a. two percent of turnover, as per the last audited consolidated financial statements of the listed entity;
 - b. two percent of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;
 - c. five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the listed entity.
 - iv. In the opinion of the Board of Directors of the Company, the event / information ought to be disclosed though not required to be statutorily intimated.
5. 'Relevant Employees' shall mean and include –
 - Senior Management Personnel as may be decided by the Board;
 - Such persons as may be identified by the CEO & Managing Director and the Chief Financial Officer, from time to time.

6. The Company Secretary serves as its Chief Investor Relations Officer to deal with dissemination of Information and disclosure of unpublished price sensitive information.
7. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.
8. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
9. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information
10. To publish proceedings of meetings with analysts and of other investor relations conferences on its official website <http://www.thirumalaichemicals.com> to ensure official confirmation and documentation of disclosures made.
11. To handle all unpublished price sensitive information on a need-to-know basis only

Policy revised by the Board at its Meeting held on 22.07.2023.