



**POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE  
OF EVENTS OR INFORMATION**

**REVISION: 02      PAGE: 1 of 4**

SUBJECT / TITLE: Kennametal India Limited (KIL) Policy for Determination of Materiality for  
Disclosure of Events or Information

This page is a record of all revisions.			For convenience, the nature of the revision is / shall be briefly noted, under the remarks column here below. Unless otherwise stated, any revision/s should be implemented effective the date the Board of Directors of KIL approve this policy.
REV.	BY	PAGES	REMARKS
00	Mr. Naveen C	1 - 5	Original Release
01	Mr. Naveen C	1 - 9	Amended and updated in line with extant laws and Regulations.
02	Mr. Naveen C	1 - 4	Amended and updated in line with extant laws and Regulations.
REV.	ISSUED BY	APPROVED BY	APPROVAL DATE
00	Mr. Naveen C	Board of Directors of KIL	November 9, 2015
01	Mr. Naveen C	Board of Directors of KIL	February 3, 2022
02	Mr. Naveen C	Board of Directors of KIL	August 11, 2023



KENNAMETAL INDIA LIMITED

**POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION**

**1. Objective**

In terms of regulation 30(4)(ii) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 (The “**Regulations**”), the Board of Directors (the “**Board**”) of Kennametal India Limited (the “**Company**”) had approved this Policy for Determination of Materiality for disclosure of events or information (“**Policy**”) on November 9, 2015 which was further amended at its meeting held on February 3, 2022 and on August 11, 2023, for determination of materiality for disclosure of events or information (“**Material Information**”) so that such information can be promptly disclosed to the Stock Exchange, as per the Regulations or its amendments.

**2. Authorised Officials**

The majority of the Key Managerial Personnel shall be the Authorised Officials to determine the materiality of events or information (hereinafter referred to as the “**Authorized Officials**”).

The Company Secretary is authorized to make intimation/s to the Stock Exchange in compliance with the Regulations and the Circular/Notification issued in connection thereto from time to time. In the absence of the Company Secretary, for any reasons, the Chief Financial Officer shall be the responsible person to disseminate intimation/s to stock exchange. In the absence of both Company Secretary and Chief Financial Officer, for any reasons, the Managing Director shall be the responsible person authorised to disseminate information to Stock Exchange.

*“Relevant Employees” means personnel who can potentially inform the Key Managerial Personnel on any material information and shall include the Senior Management Personnel. The list of Relevant Employees (other than the Senior Management Personnel) shall be determined by the Authorized Officials (majority Key Managerial Personnel) from time to time.*

*“Senior Management” or “Senior Management Personnel” means personnel of the company who are members of the India Leadership Council excluding the Board of Directors, members of the management who are one level below Chief Executive Officer or Managing Director or Whole Time Director or Manager and shall also include functional heads of the Company.*

*Key Managerial Personnel has the meaning ascribed to it under section 2(51) of the Companies Act, 2013, as amended from time to time.*

**3. Material Events**

I. All information / events as specified in Para A of Part A of Schedule III of the Regulations as may be amended from time to time are deemed to be material events and shall be disclosed as prescribed under the Regulations on occurrence of such events.

II. The information / events specified in Para B of Part A of Schedule III of the Regulations as may be amended from time to time will be disclosed based on application of guidelines for Materiality under the Regulations.

III. Any other information/event viz., major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the 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.

IV. Any event or information as may be specified from Securities and Exchange Board of India ('SEBI') from time to time.

#### 4. Guidelines for assessing Materiality

In order to determine whether a particular event / information is material in nature, the following 'quantitative' or 'qualitative' criteria(s) shall be applied:

i. **Qualitative Criteria:** In absence of quantitative criteria as stated below, Event shall be considered material by the Authorised Officials by applying following guideline for determination of materiality of events / information:

(a) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or

(b) 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; or

(c) **Quantitative Criteria:** the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:

(i) two percent of turnover, as per the last audited consolidated financial statements of the Company;

(ii) two percent of net worth, as per the last audited consolidated financial statements of the Company, except in case the arithmetic value of the net worth is negative;

(iii) 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 Company.

(d) In case where the criteria specified in sub-clauses (a), (b) and (c) above are not applicable, an event / information may be treated as being material if in the opinion of the Board of Directors of the Company, the event / information is considered material.

## **5. Notification**

The Company will disclose all the material events / information and such other filings as required under the Regulations as per the timelines prescribed from time to time.

The Authorised Officials shall, with respect to disclosures referred to in this Regulations, make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.

All disclosures made under this policy shall be hosted on the Company's website for a minimum period of five years from the date of disclosure and thereafter as per the archival policy of the Company.

## **6. Website**

As per the provision of the Regulations, this Policy shall be disclosed on the website of the Company.

## **7. Conflict**

In any circumstance where the terms of this policy differ from any existing or newly enacted law, Regulations, Notifications or circular issued by Securities and Exchange Board of India (SEBI) time to time, the law, Regulations, Notification or circular will take precedence over this policy.

## **8. Review**

This policy will be reviewed on a periodical basis as mandated by applicable law for the time being in force and/ or whenever need arises.

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