



ARROW GREENTECH LIMITED

MATERIALITY OF EVENTS POLICY

PREAMBLE

Arrow Greentech Limited (“Arrow” or “Company”) is governed by the Companies Act, 2013 (“The Act”), the Rules and Regulations framed thereunder by Ministry of Corporate Affairs (“MCA”) and Securities and Exchange Board of India (“SEBI”) LODR Regulations, 2015 (“LODR Regulations”). Regulation 30(4)(ii) of LODR Regulations, read with, SEBI Circular No CIR/CFD/CMD/4/2015, dated September 9, 2015, mandates every listed entity to lay down a ‘Code of Conduct for the Board of Directors and Senior Management’.

Accordingly, “Materiality of Events Policy” of Arrow Greentech Limited has been designed considering that stakeholders of the Company need timely, sufficient & reliable information and communication in a coherent manner regarding material events that matters/make influence on the Company as also the regulatory requirements of Regulation 30 of the SEBI (LODR) Regulations, 2015.

DEFINITIONS

1. “Determining Authority” means one or more Key Managerial Personnel duly authorised by the Board of Directors, from time to time, for the purpose of determining the Materiality of any event or any transaction or information and for the purpose of making disclosure to Stock Exchange(s). The contact details of the Determining Authority, and any changes therein as may be determined by the Board, shall be disclosed to the stock exchange(s) and as well as uploaded on the Company's website i.e. www.arrowgreentech.com
 2. “Company”, “This Company” or “The Company”, wherever occur in the policy shall mean “Arrow Greentech Limited”.
 3. “Policy” or “this policy” means “Materiality of Event Policy”.
 4. “Stock Exchanges” means where the equity shares of the Company are listed i.e. BSE Limited (BSE) and National Stock Exchange of India Limited (NSE)
 5. “Material Events” shall have the same meaning as defined under the LODR Regulations.
 6. “Mainstream Media” shall include print or electronic mode of the following:
 - i. Newspapers registered with the Registrar of Newspapers for India;
 - ii. News channels permitted by Ministry of Information and Broadcasting under Government of India;
 - iii. Content published by the publisher of news and current affairs content as defined under the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021; and
 - iv. Newspapers or news channels or news and current affairs content similarly registered or permitted or regulated, as the case may be, in jurisdictions outside India;
-

MATERIALITY ASSESSMENT AND DISCLOSURE REQUIREMENT

1. Materiality will be determined on a case-to-case basis depending on the facts and the circumstances pertaining to the event or information.
2. The events as specified in Para (A) of Part A of Schedule III of the Listing Regulations shall be disclosed irrespective of Materiality.
3. The events as specified in Para (B) of Part A of Schedule III of the Listing Regulations shall be disclosed on application of the guidelines for Materiality.
4. The Company shall apply the following guidelines for determination of Materiality of event(s) / information covered by point (3) above:
 - a) Materiality shall 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, the Company will adhere to the criteria laid under the LODR Regulations.
5. The Company shall also promptly inform the stock exchange(s) of all events or information which are specified under Regulation 30, read with Schedule III of LODR Regulations or under Regulation 51 of LODR Regulations, where applicable.
6. The Company shall also disclose all events or information with respect to subsidiaries which are material for the Company.
7. The Company shall confirm, deny or clarify any reported event or information in the mainstream media (as defined under Listing Regulations) which is not general in nature, and which indicates that rumors of an impending specific material event or information in terms of the provisions of the LODR Regulations being circulated amongst the investing public. Such disclosure will be as per the timelines prescribed under LODR Regulations.
8. The format of disclosure shall be as prescribed by SEBI under LODR Regulations, from time to time.

AUTHORITY FOR DETERMINING MATERIALITY AND DISSEMINATION OF THE INFORMATION THEREUNDER

As prescribed under Regulation 30 of LODR Regulations, the Board of Directors of the Company has severally authorised the following Key Managerial Personnel(s), for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s):

1. Managing Director
2. Company Secretary

The employees of the Company shall promptly inform the above Authorized Personnel of any event or information that shall require reporting to the stock exchange(s).



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

LIMITATION AND AMENDMENT

In the event of any conflict between the provisions of this Policy and of the LODR Regulations or of the Act or any other statutory enactments, Rules, the provisions of LODR Regulations or such Act or statutory enactments, Rules shall prevail over this Policy. Any subsequent amendment / modification in the LODR Regulations, Act, Rules and/or applicable laws in this regard shall automatically apply to this Policy.



Determining Authority for disclosure of material events or information to Stock Exchanges under Regulation 30(5) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

In terms of Regulation 30(5) of the Listing Regulations, the Board has authorized the following-

(a) To determine materiality of events or information

SR No.	NAME OF THE KEY MANAGERIAL PERSONNEL	DESIGNATION	EMAIL	PHONE
1.	Mr. Shilpan Patel	Chairman & Managing Director	legal@arrowgreentech.com	022-4974 3759
2.	Mr. Hitesh Pungalia	Chief Financial Officer	hitesh@arrowgreentech.com	022-4974 3759
3.	Mrs. Poonam Bansal	Company Secretary	poonam@arrowgreentech.com	022-4974 3759

(b) To make relevant disclosure to the Stock Exchange

SR No.	NAME OF THE KEY MANAGERIAL PERSONNEL	DESIGNATION	EMAIL	PHONE
1.	Mr. Shilpan Patel	Chairman & Managing Director	legal@arrowgreentech.com	022-4974 3759
2.	Mr. Hitesh Pungalia	Chief Financial Officer	hitesh@arrowgreentech.com	022-4974 3759
3.	Mrs. Poonam Bansal	Company Secretary	poonam@arrowgreentech.com	022-4974 3759
