



POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS/INFORMATION FOR DISCLOSURE TO STOCK EXCHANGE(S)

PREFACE

Pursuant to Regulation 30(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Listing Regulations' or 'LODR') requires every listed entity to frame a policy for determination of materiality of events and information that requires appropriate disclosure to the Stock Exchanges.

This Policy for Determination of Materiality of Events or Information is aimed at providing guidelines to the management of Sportking India Limited, to determine the materiality of events or information, and ensure timely and adequate dissemination of information to the Stock Exchange(s) (as hereinafter defined). This Policy is effective from 1st December, 2015.

OBJECTIVE

The objective of this Policy is to serve as a guiding charter to the management to ensure that timely and adequate disclosure of events or information are made to the investor community by the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, to enable them to take well informed investment decisions with regard to the securities of the Company.

DEFINITIONS

“Act” means the Companies Act, 2013 (and the Rules) and the Companies Act, 1956 to the extent applicable.

- “**Board of Directors**” means the Board of Directors of the Company.
- “**Company**” means Sportking India Limited.
- “**Key Managerial Personnel**” means key managerial personnel as defined under sub-section (51) of section 2 of the Companies Act, 2013.
- “**Listing Regulations**” means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereof.
- “**Policy**” means this policy, as amended from time to time.
- “**SEBI**” means the Securities and Exchange Board of India.

EVENTS WHICH ARE DEEMED TO BE MATERIAL EVENTS

The Company shall disclose all such events which are specified in Para A of Part A of Schedule III of the Listing Regulations (as applicable from time to time) without any application of the guidelines for materiality as specified in sub-regulation(2) of Regulation 30 of the Listing Regulations.

EVENTS WHICH ARE DEPENDENT ON APPLICATION OF GUIDELINES FOR MATERIALITY

The Company shall disclose all such material event specified in Para B of Part A of Schedule III of the Listing Regulations subject to application of guidelines for materiality. An event/information would be deemed as Material Information if:

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. any other event/information may be treated as being material if in the opinion of the Board of Directors of Company, the event / information is considered material.

CRITERIA FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION

The omission of an event or information, whose value or the expected impact in terms of value, **exceeds the lower of the following:**



- (1) **2% of turnover**, as per the last audited consolidated financial statements of the listed entity;
- (2) **2% 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;
- (3) **5% 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;

TIMELINES OF DISCLOSURES

The listed entity shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions as stated under Regulation 30 read with Part A of Schedule III.

ANY OTHER INFORMATION/EVENT WHICH IS TO BE DISCLOSED BY THE COMPANY

Without prejudice to the generality of the foregoing, the Company may make disclosures of any event/information as specified by SEBI from time to time. In case any event/information is available with the Company, which has not been indicated above but which may have material effect on the Company then the Company is required to make adequate disclosure to the Stock Exchanges in this regard.

AUTHORIZATION FOR DISCLOSURES

The following Key Managerial Personnel ("KMP") of the Company are authorized by the Board for the purpose of determining materiality of an event or information and for the purpose of making disclosures to the Stock Exchanges:

1. Managing Director
2. Chief Financial Officer
3. Company Secretary and Compliance Officer;

The Compliance Officer shall be responsible for making disclosures to the Stock Exchanges. The contact details of the Compliance Officer shall be made available to the Stock Exchanges and shall also be available on the website of the Company.

AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

DISSEMINATION OF POLICY

This Policy shall be updated and hosted on the website of the Company i.e. www.sportking.co.in

Reviewed and amended on 22.07.2023.