

GTT Data Solutions Limited

(Formally known as CINERAD Communications Ltd.)

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Policy on Determination of Materiality for Disclosures

1. Background

GTT Data Solutions Limited (*Formerly Known as Cinerad Communications Limited*) ('the Company') is committed to being open and transparent with all stakeholders and in disseminating information in a fair and timely manner. The Company's securities are listed on BSE Limited (BSE) and National Stock Exchange of India Limited (NSE) and must comply with the continuous disclosure obligations imposed by the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 ("SEBI Listing Regulations") that came into effect from December 1, 2015. Listing Regulations mandate listed entities to formulate a policy for determining materiality of events or information that warrant disclosure to investors. It is in this context that the Policy on Determination of Materiality for Disclosures ("Policy") is being framed and implemented.

2. Definitions

In this Policy, unless the context otherwise requires:

- a. "Board of Directors" shall mean the Board of Directors of the Company.
- b. "Chief Financial Officer" shall mean the person heading and discharging the finance function of the listed entity as disclosed by it to the recognised stock exchange(s) in its filing under the SEBI Listing Regulations;
- c. "Key Managerial Personnel" or "KMP" means Manager, Executive Director, Chief Financial Officer, and Company Secretary of the Company.
- d. "Promoter" and "Promoter Group" shall have the same meaning as assigned to them respectively in clauses (oo) and (pp) of Regulation 2(1) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.
- e. "Subsidiary" means a subsidiary as defined under Section 2(87) of the Companies Act, 2013;

All other words and expressions used but not defined in this Policy, shall have the same meaning as defined in the SEBI Listing Regulations, and if not defined therein, then as per the Companies Act, 2013 or the Securities Contracts (Regulation) Act, 1956 or the Securities and Exchange Board of India (Depositories And Participants) Regulations, 2018 and/or the rules and regulations made thereunder, or any statutory modification or re-enactment thereto, as the case may be.

3. Objective of the Policy

The objectives of this Policy are as follows:

1. The Purpose of this Policy is to determine materiality based on criteria specified in Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the SEBI LODR, 2015") and to disclose material events which are necessary to be disclosed to the stock exchanges based on criteria as adopted as part of this policy and such criteria as prescribed in the Regulation.
2. To ensure that the Company complies with the disclosure obligations to which it is subject as a publicly-traded company as laid down by the SEBI LODR, 2015, various Securities Laws and any other legislations, as applicable.
3. To ensure that the information disclosed by the Company is adequate, accurate, timely and transparent.
4. To ensure that corporate documents and public statements are accurate and do not contain any misrepresentation.
5. To protect the confidentiality of material/price sensitive information within the context of the Company's disclosure obligations.
6. To provide a framework that supports and fosters confidence in the quality and integrity of information released by the Company.
7. To ensure uniformity in the Company's approach to disclosures, raise awareness and reduce the risk of selective disclosures.

4. Type of Information

The information covered by this Policy shall include "information related to the Company's business, operations, or performance which has a significant effect on securities investment decisions" (hereinafter referred to as "material information") that the Company is required to disclose in a timely and appropriate manner by applying the guidelines for assessing materiality. Events or information that is to be disclosed based on materiality principle are specified in **Annexure 1** to this Policy.

Events or information that is to be disclosed without any application of the guidelines for materiality are specified in **Annexure 2** to this Policy.

Any event or information which is not included in Annexure 1 and 2 of this policy but which may have material impact on the Company, the Company shall take adequate steps to make such disclosures in this regards.

5. **Any receipt of a communication from any regulatory, statutory, enforcement or judicial authority is required to be disclosed by the Company in terms of Regulation 30 of SEBI LODR, 2015, the Company shall disclose such communication, along with the event or information, unless the disclosure of such communication is prohibited by such authority, persons responsible for Disclosure**

The Board of Directors of the Company have authorised the KMP as defined under clause 2(c) of the Policy to determine the materiality of an event or information and to make appropriate disclosure on a timely basis. The KMPs are also empowered to seek appropriate counsel or guidance, as and when necessary, from other internal or external stakeholders as they may deem fit.

1. The KMPs shall have the following powers and responsibilities for determining the material events or information: To review and assess an event or information that may qualify as 'material' and may require disclosure, on the basis of facts and circumstances prevailing at a given point in time.
2. To determine the appropriate time at which the disclosures are to be made to the stock exchanges based on an assessment of actual time of occurrence of an event or information.
3. To disclose developments that are material in nature on a regular basis, till such time the event or information is resolved/closed, with relevant explanations.
4. To consider such other events or information that may require disclosure to be made to the stock exchanges which are not explicitly defined in the SEBI LODR, 2015 and determine the materiality, appropriate time and contents of disclosure for such matters.
5. To disclose all events or information with respect to the subsidiaries which are material for the Company.

6. Guidelines for Assessing Materiality

Materiality will be determined on a case to case basis depending on the facts and the circumstances pertaining to the event or information.

The following qualitative criteria will be applicable for determining materiality of event or information:

- a. the omission of an event or information which is likely to:
 - result in a discontinuity or alteration of an event or information already available publicly; or
 - result in significant market reaction if the said omission came to light at a later date.
- b. 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.
- c. In case, where the criteria specified in sub-clauses (a) & (b) is not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the company, the event or information is considered as material.

Where any continuing event or information becomes material pursuant to the amendment in the SEBI LODR, 2015, the same shall be disclosed by the Company within thirty days from the date of coming into effect of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2023.

7. Guidance on Timing of an Event or Information

The company shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions of this regulation as soon as reasonably possible and in any case not later than the following:

- (i) thirty minutes from the closure of the meeting of the Board of Directors in which the decision pertaining to the event or information has been taken;
- (ii) twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the Company;
- (iii) twenty-four hours from the occurrence of the event or information, in case the event or information is not emanating from within the Company;

The disclosures with respect to events for which timelines have been specified in Part A of Schedule III of SEBI LODR, 2015 of Listing Regulation, the same shall be made within such timelines.

In case the disclosures are made after the timelines specified above, the company shall, along with the disclosures provide for explanation of delay.

The company shall, with respect to events referred in Para 4, Annexure 1 and 2 to this policy, make disclosures on a regular basis informing the material development, till such time the event is resolved/closed, with relevant explanation.

The Company may be confronted with the question as to when an event/information can be said to have occurred.

In certain instances, the answer to above question would depend upon the stage of discussion, negotiation or approval and in other instances where there is no such discussion, negotiation or approval required, viz. in case of natural calamities, disruptions, etc., the answer to the above question would depend upon the timing when the Company became aware of the event/information.

In the former, the events/information can be said to have occurred upon receipt of approval of Board of Directors.

However, considering the price sensitivity involved, for certain events, e.g. decision on declaration of dividends etc., disclosure shall be made on receipt of approval of the event by the Board of Directors, pending shareholders' approval.

In the latter, the events/information can be said to have occurred when the Company becomes aware of the events/information, or as soon as, an officer of the Company has, or ought to have reasonably come into possession of the information in the course of the performance of his duties.

Here, the term 'officer' shall have the same meaning as defined under the Companies Act, 2013 and shall also include promoter of the Company.

8. Obligations of Internal Stakeholders and KMPs for Disclosure

- a. Any event or information, including the information forming part of Para 4 of the Policy or Annexure 1 and Annexure 2 to the Policy shall be forthwith informed to the KMP(s) upon occurrence, with adequate supporting data/information, to facilitate a prompt and appropriate disclosure to the stock exchanges.
- b. The KMP(s) will then ascertain the materiality of such event(s) or information based on the above guidelines.
- c. On completion of the assessment, the KMP(s) shall, if required, make appropriate disclosure(s) to the stock exchanges.

9. Policy Review

The KMP(s) may review the Policy from time to time. Any material changes to the Policy will need the approval of the Board of Directors.

10. Effective Date

This updated Policy, as approved by the Board of Directors, shall be effective from June 1, 2024.

11. Website

As per the provisions of the SEBI Listing Regulations, the Policy shall be disclosed on the website of the Company.

All information which has been disclosed to stock exchange(s) under Regulation 30 of SEBI LODR, 2015, shall be hosted on the website of the company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website.

The Company shall disclose all events or information with respect to subsidiaries which are material for the company.

6. Contact Details

Any questions or clarifications about the policy or disclosures made by the Company should be referred to the Company Secretary, who is in charge of administering, enforcing and updating this policy.

7. Limitation and Amendment

In the event of any conflict between the provisions of this Policy and of the Act or SEBI LODR, 2015 or any other statutory enactments, rules, the provisions of such Act or SEBI LODR, 2015 or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the SEBI LODR, 2015, Act and/or applicable laws in this regard shall automatically apply to this Policy.

Annexure 1

Events or Information that are to be disclosed based on Materiality Guidelines listed in the Policy [As per Regulation 30 read with Para B Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as applicable]

1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2. Any of the following events pertaining to the Company:
 - (a) arrangements for strategic, technical, manufacturing or marketing tie-up; or
 - (b) adoption of new line(s) of business; or
3. (c) closure of operation of any unit, division or subsidiary (in entirety or in piecemeal) capacity addition or product launch.
4. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
5. Agreements (viz. loan agreement(s) 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.
6. Disruption of operations of any one or more units or division of the Company due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
7. Effect(s) arising out of change in the regulatory framework applicable to the Company.
8. Pending of any Litigation(s) / dispute(s) / outcome thereof which may have impact on the Company.
9. Fraud/defaults etc. by employees of the Company which has/ may have an impact on the Company.
10. Options to purchase securities including any ESOP/ESPS Scheme.
11. Giving of guarantees or indemnity or becoming a surety, by whatever named called for any third party.
12. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
13. Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority.

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 listed entity which may be necessary to enable the holders of securities of the listed entity to appraise its position and to avoid the establishment of a false market in such securities.

Annexure 2**Events or Information that are to be disclosed without being based on Materiality****Guidelines listed in the Policy**

[As per Regulation 30 read with Para A of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as applicable]

Sr. No.	Events requiring Disclosure
1.	Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation, merger, demerger or restructuring), sale or disposal of any unit(s), division(s), whole or substantially the whole of the undertaking(s) or subsidiary of the Company, sale of stake in associate company of the Company or any other restructuring. Explanation (1) - For the purpose of this sub-paragraph, the word 'acquisition' shall mean- (i) acquiring control, whether directly or indirectly; or (ii) acquiring or agreement to acquire shares or voting rights in a company, whether existing or to be incorporated, whether directly or indirectly, such that – (a) the Company holds shares or voting rights aggregating to five per cent or more of the shares or voting rights in the said company; or (b) there has been a change in holding from the last disclosure made under sub-clause (a) of clause (ii) of the Explanation to this sub-paragraph and such change exceeds two per cent of the total shareholding or voting rights in the said company; or (c) the cost of acquisition or the price at which the shares are acquired exceeds the threshold specified in sub-clause (c) of clause (i) of sub-regulation (4) of regulation 30 of SEBI LODR, 2015. Explanation (2) - For the purpose of this sub-paragraph, “sale or disposal of subsidiary” and “sale of stake in associate company” shall include- (i) an agreement to sell or sale of shares or voting rights in another company such that the another company ceases to be a wholly owned subsidiary, a subsidiary or an associate company of the Company; or (ii) an agreement to sell or sale of shares or voting rights in a subsidiary or associate company such that the amount of the sale exceeds the threshold specified in sub-clause (c) of clause (i) of sub-regulation (4) of regulation 30 of SEBI LODR, 2015. Explanation (3)- For the purpose of this sub-paragraph, “undertaking” and “substantially the whole of the undertaking” shall have the same meaning as given under section 180 of the Companies Act, 2013.]
2.	Issuance or forfeiture of securities split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.
3.	New Ratings or Revision in Rating(s)

4.	<u>Outcome of meetings of the Board of Directors.</u> The Company shall disclose to the StockExchanges within 30 minutes of the closure of the meeting held to consider the following: - Dividends and/or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched; - Any cancellation of dividend with reasons thereof; - The decision on buy back of securities; - The decision with respect to fund raising proposed to be undertaken; - Increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched; - Reissue of forfeited shares or securities or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to; - Short particulars of any other alterations of capital, including calls; - Financial results; - Decision on voluntary delisting by the Company from stock exchanges; case the meeting of Board of Directors is being held for more than one day, the financial results shall be disclosed within thirty minutes of the end of the meeting for the day on which it has been considered.)
5. 5A	Agreements (viz shareholder agreements) joint venture agreements, family settlement agreements (to the extent that it impacts management and control of the Company), agreements/treaties/contracts with media companies which are binding and not in normal course of business, revisions or amendments and terminations thereof. Agreements entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the listed entity or of its holding, subsidiary or associate company, among themselves or with the listed entity or with a third party, solely or jointly, which, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the Company or impose any restriction or create any liability upon the Company, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the Company is a party to such agreements: Provided that such agreements entered into by a Company in the normal course of business shall not be required to be disclosed unless they, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the Company or they are required to be disclosed in terms of any other provisions of SEBI LODR, 2015. Explanation: For the purpose of this clause, the term “directly or indirectly” includes agreements creating obligation on the parties to such agreements to ensure that Company shall or shall not act in a particular manner.
6.	Fraud or defaults by a Company, its promoter, director, key managerial personnel, senior management or subsidiary or arrest of key managerial personnel, senior management, promoter or director of the Company, whether occurred within India or abroad: For the purpose of this clause: (i) ‘Fraud’ shall include fraud as defined under Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.

	(ii) 'Default' shall mean non-payment of the interest or principal amount in full on the date when the debt has become due and payable. Explanation 1- In case of revolving facilities like cash credit, an entity would be considered to be in 'default' if the outstanding balance remains continuously in excess of the sanctioned limit or drawing power, whichever is lower, for more than thirty days. Explanation 2- Default by a promoter, director, key managerial personnel, senior management, subsidiary shall mean default which has or may have an impact on the Company.
7.	Change in directors, key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc., Senior Management, Auditor and Compliance Officer.
7A.	Resignation of Auditor of the Company: In case of resignation of the auditor of the Company, the detailed reason for resignation of auditor, as given by the said auditor, shall be disclosed by the Company to the stock exchanges as soon as possible but not later than twenty-four hours of receipt to the stock exchanges from the auditor.
7B.	Resignation of independent director including reasons for resignation: In case of resignation of an independent director of the Company, within seven days from the date of resignation, the following disclosures shall be made to the stock exchanges by the Company: - The letter of resignation along with detailed reasons for the resignation as given by the said director. - Name of other listed Companies in which the resigning director holds directorships, indicating the category of directorship and membership of board committees, if any. - The independent director shall, along with the detailed reasons, also provide a confirmation that there is no other material reason other than those provided. - The confirmation as provided by the independent director above shall also be disclosed by the Company to the stock exchanges along with the disclosures as specified in clause (i), (ii) and (iii) above.
7C	Resignation of Key Managerial Personnel, Senior management, Compliance Officer or director other than an independent director: In case of resignation of Key Managerial Personnel, Senior management, Compliance Officer or director other than an independent director the letter of resignation along with detailed reasons for the resignation as given by the key managerial personnel, senior management, Compliance Officer or director shall be disclosed to the stock exchanges by the Company within seven days from the date that such resignation comes into effect.
7D	In case the Managing Director or Chief Executive Officer of the Company was indisposed or unavailable to fulfil the requirements of the role in a regular manner for more than forty five days in any rolling period of ninety days, the same along with the reasons for such indisposition or unavailability, shall be disclosed to the stock exchange(s).
8.	Appointment or discontinuation of a share transfer agent

9.	Resolution plan/ Restructuring in relation to loans/borrowings from banks/financial institutions including the following details: i. Decision to initiate resolution of loans/borrowings; ii. Signing of Inter-Creditors Agreement (ICA) by lenders; iii. Finalization of Resolution Plan; iv. Implementation of Resolution Plan; v. Salient features not involving commercial secrets, of the resolution/ restructuring plan as decided by lenders
10.	One time settlement with a bank
11.	Winding-up petition filed by any party / creditors
12.	Issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the Company.
13.	Proceedings of Annual and extraordinary general meetings of the Company
14.	Amendments to memorandum and articles of association of Company, in brief
15.	(a) Schedule of analysts or institutional investors meet at least two working days in advance (excluding the date of the intimation and the date of the meet) and presentations made by the Company to analysts or institutional investors. Explanation: For the purpose of this clause 'meet' shall mean group meetings or group conference calls conducted physically or through digital means. (b) Audio or video recordings and transcripts of post earnings/quarterly calls, by whatever name called, conducted physically or through digital means, simultaneously with submission to the recognized stock exchange(s), in the following manner: i. the presentation and the audio/video recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier; ii. the transcripts of such calls shall be made available on the website within five working days of the conclusion of such calls
16.	The following events in relation to the corporate insolvency resolution process (CIRP) of a listed corporate debtor under the Insolvency Code: a. Filing of application by the corporate applicant for initiation of CIRP, also specifying the amount of default; b. Filing of application by financial creditors for initiation of CIRP against the corporate debtor, also specifying the amount of default; c. Admission of application by the Tribunal, along with amount of default or rejection or withdrawal, as applicable; d. Public announcement made pursuant to order passed by the Tribunal under section 13 of Insolvency Code; e. List of creditors as required to be displayed by the corporate debtor under regulation 13(2)(c) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016; f. Appointment/ Replacement of the Resolution Professional;

	g. Prior or post-facto intimation of the meetings of Committee of Creditors; h. Brief particulars of invitation of resolution plans under section 25(2)(h) of Insolvency Code in the Form specified under regulation 36A (5) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016; i. Number of resolution plans received by Resolution Professional; j. Filing of resolution plan with the Tribunal; k. Approval of resolution plan by the Tribunal or rejection, if applicable; l. Salient features and details of the resolution plan as approved by the Adjudicating Authority, under the Insolvency Code, not involving commercial secrets, including the details such as: i. Pre and Post net-worth of the company; ii. Details of assets of the company post CIRP; iii. Details of securities continuing to be imposed on the companies' assets; iv. Other material liabilities imposed on the company; v. Detailed pre and post shareholding pattern assuming 100% conversion of convertible securities; vi. Details of funds infused in the company, creditors paid-off; vii. Additional liability on the incoming investors due to the transaction, source of such funding etc.; viii. Impact on the investor –revised P/E, RONW ratios etc.; ix. Names of the new promoters, key managerial personnel, if any and their past experience in the business or employment. In case where promoters are companies, history of such company and names of natural persons in control; x. Brief description of business strategy. m. Any other material information not involving commercial secrets. n. Proposed steps to be taken by the incoming investor/acquirer for achieving the MPS; o. Quarterly disclosure of the status of achieving the MPS; p. The details as to the delisting plans, if any approved in the resolution plan.]
17.	Initiation of Forensic audit: In case of initiation of forensic audit, (by whatever name called), the following disclosures shall be made to the stock exchanges by Company: a) The fact of initiation of forensic audit along-with name of entity initiating the audit and reasons for the same, if available; b) Final forensic audit report (other than for forensic audit initiated by regulatory / enforcement agencies) on receipt by the Company along with comments of the management, if any.

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18.	Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel or senior management of a Company, in relation to any event or information which is material for the Company in terms of regulation 30 of the SEBI LODR, 2015 and is not already made available in the public domain by the Company. Explanation –“social media intermediaries” shall have the same meaning as defined under the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.
19.	Action(s) initiated or orders passed by any regulatory, statutory, enforcement authority or judicial body against the Company or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the Company, in respect of the following: (a) search or seizure; or (b) re-opening of accounts under section 130 of the Companies Act, 2013; or (c) investigation under the provisions of Chapter XIV of the Companies Act, 2013; along with the following details pertaining to the actions(s) initiated, taken or orders passed: - name of the authority; - nature and details of the action(s) taken, initiated or order(s) passed; - date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority; - details of the violation(s)/contravention(s) committed or alleged to be committed; impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible.

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20.	Action(s) taken or orders passed by any regulatory, statutory, enforcement authority or judicial body against the Company or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the Company, in respect of the following: a. suspension; b. imposition of fine or penalty; c. settlement of proceedings; d. debarment; e. disqualification; f. closure of operations; g. sanctions imposed; h. warning or caution; or i. any other similar action(s) by whatever name called; along with the following details pertaining to the actions(s) initiated, taken or orders passed: i. name of the authority; ii. nature and details of the action(s) taken, initiated or order(s) passed;
	iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority; iv. details of the violation(s)/contravention(s) committed or alleged to be committed; v. impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible.
21.	Voluntary revision of financial statements or the report of the board of directors of the Company under section 131 of the Companies Act, 2013.