

THE GREAT EASTERN SHIPPING COMPANY LIMITED

Policy of The Great Eastern Shipping Company Limited for determining 'material' events / information for the purposes of disclosures to stock exchanges.

- a) This Policy is made pursuant to the requirements of Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as the 'Regulations').
- b) The Company shall make disclosure of events specified in Para B of Part A of Schedule III of the Regulations or any other event, based on application of the guidelines for materiality, as specified hereinafter.
- c) The Company shall consider the following criteria for determination of materiality of events / information:
 - (i) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
 - (ii) 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;
 - (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 Company;

- (b) 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;
 - (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 Company.
 - (iv) In case where the criteria specified in sub-clauses (i), (ii) and (iii) aforesaid are 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 material.
- d) The Company shall also disclose all events or information with respect to its subsidiaries which are 'material' for the Company based on application of the guidelines for materiality as aforesaid.
- e) Following Key Managerial Personnel of the Company have been severally authorized for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchanges under the Regulations:
 - (i) Mr. G. Shivakumar, Executive Director and Chief Financial Officer
The Great Eastern Shipping Company Limited
Ocean House, 134/A, Dr. Annie Besant Road, Worli, Mumbai – 400018
Tel No.: 022-66613000
Fax No.: 022-24925900
Email: g_shivakumar@greatship.com
 - (ii) Mr. Anand Punde, Company Secretary
The Great Eastern Shipping Company Limited
Ocean House, 134/A, Dr. Annie Besant Road, Worli, Mumbai – 400018

Tel No.: 022-66613000

Fax No.: 022-24925900

Email: anand_punde@greatship.com

- f) The events or information specified in Para A & Para B of Part A of Schedule III of the SEBI Listing Regulations shall be forthwith informed by the Senior Management Personnel of the Company / its subsidiaries to the aforesaid Key Managerial Personnel upon occurrence with adequate supporting data / information to facilitate an appropriate disclosure to the Stock Exchanges within the timelines specified in the Regulations.
- g) The Company shall disclose on its website all disclosures made to stock exchanges under the Regulations and such disclosures shall be hosted on the website for a minimum period of five years.
- h) This Policy has been adopted by the Board of Directors of the Company at its meeting held on November 6-7, 2015 and has been amended by the Board of Directors of the Company at their meeting held on August 03, 2023.