

POLICY FOR DETERMINING MATERIALITY FOR DISCLOSURE OF INFORMATION

As per Regulation 30 of the SEBI (Listing Obligation & Disclosure Requirement) Regulations, 2015), the Company is required to make disclosure of various events and information to the Stock Exchanges.

The events / information has been classified into two categories namely,

- i. Events/information to be disclosed irrespective of materiality (as specified in Para A of Part A of Schedule III); and
- ii. Events/information to be disclosed based on the application of guidelines for materiality as per the criteria prescribed therein (as specified in Para B of Part A of Schedule III).

The Board of Directors of the Company is required to approve a policy for determining the materiality and nominate one or more KMPs to decide on the same and issue the disclosures.

In addition to the above, the Company is also required to disclose major developments that are likely to affect the business, such as emergence of new technologies, expiry of patents, change in accounting policy which may have significant impact on accounts, etc.

The Policy

The information/events specified in Section B of Part A of Schedule III to the Regulations shall be deemed material if in the opinion of the Designated KMP (as specified below)

- i) The non-disclosure of the information/event will result in discontinuation or alteration of the information/event already disclosed and/or available in public domain or
- ii) The non-disclosure of the information/event will have significant impact in the securities market, if and when the same comes to public domain subsequently.
- iii) Omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - 2% of turnover, as per the last audited consolidated financial statements of the listed entity;
 - 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;
 - 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;
- iv) Such events/information are likely to affect the business of the Company significantly and would be essential for the investors dealing in the securities of the Company to be aware of the same.

Time frame for disclosure of material events/information

Pursuant to Regulation 30(6) of the Regulations, 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) 30 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;

“Provided that in case the meeting of the board of directors closes after normal trading hours of that day but more than three hours before the beginning of the normal trading hours of the next trading day, the listed entity shall disclose the decision pertaining to the event or information, within three hours from the closure of the board meeting:

Provided further that in case the meeting of the board of directors is being held for more than one day, the financial results shall be disclosed within thirty minutes or three hours, as applicable, from closure of such meeting for the day on which it has been considered.”
- (ii) 12 hours from the occurrence of the event or information, in case the event or information is emanating from within the listed entity;
- (iii) 24 hours from the occurrence of the event or information, in case the event or information is not emanating from within the listed entity

KMP

Pursuant Regulation 30 (5) of the Regulations, the Whole-time Director of the Company is authorized to determine the materiality of the event/information considering the above policy and the Company Secretary to disclose such event/information to the NSE, within the timeline based on the category of information.

Validity and amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. Any subsequent amendment/modification in the Companies Act, 2013 or the Rules framed thereunder or the SEBI (LODR) Regulations and/or any other laws in this regard shall automatically apply to this Policy.

This policy shall be reviewed by the Board of Directors at least once in three years and /or as and when required and updated accordingly.

Reviewed by the Board of Directors at its meeting held on 18th May 2026
