DCM SHRIRAM INTERNATIONAL FINE CHEMICALS

DCM SHRIRAM FINE CHEMICALS LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS

Pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015

(Approved by the Board of Directors on 24.12.2025)

1. PREAMBLE

The Board of Directors (the "Board") of DCM Shriram Fine Chemicals Ltd. (the "Company"), has adopted a Policy and procedures with regard to determination of materiality of events pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, which came into effect from in its meeting held on 24.12.2025.

In terms of Regulation 30 read with Schedule III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), as amended from time to time, DCM Shriram Fine Chemicals Limited ("the Company") has formulated this "Policy for Determination of Materiality" (the "Policy"), as framework for ascertaining the materiality of events or information for making disclosures.

2. DEFINITIONS

- 'Compliance Officer' means 'Company Secretary' or any other person appointed as such by the Board, from time to time.

- 'Determining Materiality of an Event Authority' means CFO and Company Secretary of the Company, who will be jointly entitled to take a view on the materiality/ price sensitivity of an event that qualifies for disclosure and to determine the appropriate time and details of disclosure to be filed with the Stock Exchange.

- Key Managerial Personnel (KMP) in relation to the Company, means-

  (i) the Managing Director;
  (ii) the Chief Financial Officer;
  (iii) the Company Secretary.

- "Listing Regulations" means SEBI (LODR) Regulations, 2015

- "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.

- `Material Events' means transactions or arrangements as specified in Para A & B of Part A of Schedule III of SEBI Listing Regulations hereunder indicating materiality threshold as well as any price sensitive information.

- `Price Sensitive Information' means any information which relates, directly or indirectly, to the Company that is not generally available and which upon becoming generally available is likely to materially affect the price of securities of the Company.

- "Senior Management" shall mean the officers and personnel of the listed entity who are members of its core management team, excluding the Board of Directors, and shall also comprise all the members of the management one level below the Chief Executive Officer or Managing Director or Whole Time Director including they are not part of the Board of Directors and shall specifically include the functional heads, by whatever name called and the Company Secretary and the Chief Financial Officer.

- `Stock Exchanges' means where the equity shares in the Company are listed i.e. presently BSE and NSE.

3. INTERPRETATION

Terms that have not been defined in this policy shall have the same meaning assigned to them in the SEBI Listing Regulations and Companies Act, 2013 as amended from time to time.

4. APPLICABILITY

This Policy is applicable for determination of materiality of events/ information to be disclosed to Stock Exchanges, which in the opinion of Board of Directors is material. Some of the events have been identified in

SEBI Listing Regulations which shall be deemed to be material events and shall be disclosed accordingly.

5. CRITERIA FOR DETERMINING MATERIALITY

Criteria for determining the materiality of events or information for making disclosures shall be as under:

Sl. No.	Type of event / information	Criteria for determining its materiality
A.	Events / information deemed to be material [Refer Annexure-I]	All events / information falling under Para A of Part A of Schedule III of SEBI Listing Regulations (as per Annexure-1) are deemed to be material and shall be disclosed.
B.	Events / information considered material based on meeting certain criteria [Refer Annexure-II]	All events / information falling under Para B of Part A of Schedule III of SEBI Listing Regulations (as per Annexure-2), which meet the following criteria, shall be considered material and shall be disclosed: (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; or (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) 2% of Turnover, as per the last audited consolidated financial statements of the Company; (b) 2% 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) 5% of the Average of Absolute Value of Profit or Loss After Tax, as per the last

Sl. No.	Type of event / information	Criteria for determining its materiality
		three audited Consolidated Financial Statements of the Company . (iv) The event or information is considered material in the opinion of the Board of Directors of the Company.
C	Any other events / information viz. major development etc.	Any 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 Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities, shall be disclosed.
D	Any other events / information specified by SEBI	Event / information as specified by SEBI from time to time shall be disclosed.
E	Any other event / information, as may be decided by the Board	Any other event / information which the Board of Directors of the Company may decide to disclose shall be disclosed.

6. DISCLOSURE OBLIGATIONS & AUTHORIZATION OF KMPs

a) KMPs authorised to determine materiality of events / information

The CFO and Company Secretary shall jointly determine the materiality of the event or information as per this Policy, for the purpose of making disclosure.

Contact Details of CFO and Company Secretary shall be disclosed to the stock exchange(s) and shall also be made available on the website of the Company.

b) Responsibility of Senior Management Personnel

All Senior Management Personnel of the Company shall identify, within their respective functional area(s), any potential material event or information

based on Para 5 of this Policy and promptly intimate the same to CFO and Company Secretary.

No Senior Management Personnel shall make any announcement or communication through social media intermediaries or mainstream media regarding any potential material event or information, as defined in Para 5 of this Policy, without consulting the MD, CFO and Company Secretary.

In case any Senior Management Personnel requires any assistance in identification of any potential event or information as material for the purpose of this Policy, they shall consult the MD, CFO and Company Secretary.

c) Responsibility for making disclosure to stock exchange(s)

In case the materiality is so determined or mandatory disclosure is required to be made, the Company Secretary shall make the disclosure to the stock exchange(s).

d) Timeline and Manner of making disclosure(s)

The timeline for making disclosures under this Policy shall be:

- 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. In case the closure of meeting of Board of Directors is after normal trading hours but more than 3 hours before the next trading day, then disclosure shall be made within 3 hours from closure of Board Meeting.

- 12 hours from the occurrence of the event or information, in case the event or information is emanating from within the Company;

- 24 hours from the occurrence of the event or information, in case the event or information is not emanating from within the Company.

All disclosures pursuant to this Policy shall be made in manner compliant with the SEBI Listing Regulations, as amended from time to time.

In case an event or information is required to be disclosed in terms of Regulation 30 of SEBI Listing Regulations, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

7. GENERAL

The Company Secretary in consultation with MD is authorized to modify / amend / revise this Policy from time to time, to the extent of giving effect to any statutory amendment(s) or any clarification(s) issued by any statutory authority that needs to be incorporated in this Policy.

Notwithstanding the above, the Board of Directors may review and amend this Policy from time to time.

DCM SHRIRAM INTERNATIONAL FINE CHEMICALS

Annexure –I

Mandatory Disclosures

Events / information deemed to be material (Corresponding to Para A of Part A of Schedule III of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015)

Sl. No.	Type of event / information for mandatory disclosure	Timeline for 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 listed entity, sale of stake in associate company of the listed entity or any other restructuring. Explanation - For the purpose of this sub-para, 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 listed entity 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. 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 a company such that the company ceases to be a wholly owned subsidiary, a subsidiary or an associate company of the	Within 12 hours*

Sl. No.	Type of event / information for mandatory disclosure	Timeline for Disclosure
	listed entity; 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. 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.	Within 12 hours*
3	New Rating(s) or Revision in Rating(s).	Within 24 hours
4	Outcome of Meetings of the Board of Directors: The listed entity shall disclose to the Exchange(s), within 30 minutes of the closure of the meeting, held to consider the following: a) 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; b) any cancellation of dividend with reasons thereof; c) the decision on buyback of securities; d) the decision with respect to fund raising proposed to be undertaken; e) increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched; f) 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; g) short particulars of any other alterations of capital, including calls;	Within 30 minutes

Sl. No.	Type of event / information for mandatory disclosure	Timeline for Disclosure
	h) financial results; i) decision on voluntary delisting by the listed entity from stock exchange(s) Provided that in case of board meetings being held for more than one day, the financial results shall be disclosed within thirty minutes of end of the meeting for the day on which it has been considered.	
5	Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the listed entity), agreement(s)/treaty(ies)/contract(s) with media companies) which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.	Within 12 hours* (for agreements where listed entity is a party) Within 24 hours (for agreements where listed entity is not a party)
5A	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 listed entity or impose any restriction or create any liability upon the listed entity, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the listed entity is a party to such agreements: Provided that such agreements entered into by a listed entity 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	Within 12 hours* (for agreements where listed entity is a party) Within 24 hours (for agreements where listed entity is not a party)

Sl. No.	Type of event / information for mandatory disclosure	Timeline for Disclosure
	to, impact the management or control of the listed entity or they are required to be disclosed in terms of any other provisions of these regulations. 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 listed entity shall or shall not act in a particular manner.	
6	Fraud or defaults by listed entity, its Promoter, Director, Key Managerial Personnel, Senior Management or subsidiary or arrest of Key Managerial Personnel, Senior Management, Promoter or Director of the listed entity, whether occurred within India or abroad. For the purpose of this sub-paragraph: (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 and subsidiary shall mean default which has or may have an impact on the listed entity.	Within 24 hours
7	Change in Directors, Key Managerial Personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.), Senior Management, Auditor and Compliance Officer.	Within 12 hours* (except in case resignation) Within 24 hours (in case of

Sl. No.	Type of event / information for mandatory disclosure	Timeline for Disclosure
		resignation)
7A	In case of resignation of the auditor of the listed entity, detailed reasons for resignation of auditor, as given by the said auditor, shall be disclosed by the listed entities to the stock exchanges as soon as possible but not later than twenty four hours of receipt of such reasons from the auditor.	Within 24 hours
7B	Resignation of Independent Director including reasons for resignation: In case of resignation of an Independent Director of the listed entity, within seven days from the date of resignation, the following disclosures shall be made to the stock exchanges by the listed entities: (i) The letter of resignation along with detailed reasons for the resignation as given by the said Director. (ia) Names of listed entities in which the resigning director holds Directorships, indicating the category of Directorship and Membership of Board Committees, if any. (ii) The Independent Director shall, along with the detailed reasons, also provide a confirmation that there is no other material reasons other than those provided. (iii) The confirmation as provided by the Independent Director above shall also be disclosed by the listed entities to the stock exchanges along with the detailed reasons as specified in sub-clause (i) and (ii) above.	Within 7 days
7C	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 listed entities within seven days from the date that such resignation comes into effect.	Within 7 days
7D	In case the Managing Director or Chief Executive Officer of the listed entity 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	Within 12 hours*

Sl. No.	Type of event / information for mandatory disclosure	Timeline for Disclosure
	indisposition or unavailability, shall be disclosed to the stock exchange(s).	
8	Appointment or discontinuation of Share Transfer Agent.	Within 12 hours*
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.	Within 24 hours
10	One time settlement with a bank.	Within 24 hours
11	Winding-up petition filed by any party / creditors.	Within 24 hours
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 listed entity.	Within 12 hours*
13	Proceedings of Annual and Extra-ordinary General Meetings of the listed entity.	Within 12 hours*
14	Amendments to Memorandum and Articles of Association of listed entity, in brief.	Within 12 hours*
15	(a) Schedule of analysts or institutional investors meet at least two working days in advance (excluding the date of intimation and the date of the meet) and presentations made by the listed entity 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.	Within 24 hours (for presentation) Within 5 days (for transcripts)

Sl. No.	Type of event / information for mandatory disclosure	Timeline for Disclosure
	(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;	Within 24 hours

Sl. No.	Type of event / information for mandatory disclosure	Timeline for Disclosure
	(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) Specific features and details of the resolution plan as approved by the Adjudicating Authority under the Insolvency Code, not involving commercial secrets, including 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 persons(s), 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	

Sl. No.	Type of event / information for mandatory disclosure	Timeline for Disclosure
	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 listed entities: (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 listed entity along with comments of the management, if any.	Within 12 hours* (If initiated by the listed entity) Within 24 hours (if initiated by external agency)
18	Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel or senior management of a listed entity, in relation to any event or information which is material for the listed entity in terms of regulation 30 of these regulations and is not already made available in the public domain by the listed entity. Explanation – "social media intermediaries" shall have the same meaning as defined under the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.	Within 24 hours
19	Action(s) initiated or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial	Within 24 hours

Sl. No.	Type of event / information for mandatory disclosure	Timeline for Disclosure
	personnel, senior management, promoter or subsidiary, in relation to the listed entity, 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: 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.	
20	Action(s) taken or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the listed entity, 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: (1) name of the authority; (2) nature and details of the action(s) taken, initiated or order(s) passed; (3) date of receipt of direction or order, including	Within 24 hours

Sl. No.	Type of event / information for mandatory disclosure	Timeline for Disclosure
	any ad-interim or interim orders, or any other communication from the authority; (4) details of the violation(s)/contravention(s) committed or alleged to be committed; (5) 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 listed entity under section 131 of the Companies Act, 2013.	Within 12 hours*

* Note: In case the event or information emanates from a decision taken in a meeting of board of directors, the same shall be disclosed within 30 minutes from the closure of such meeting as against the timeline indicated in the table above.

Annexure-II

Materiality-based Disclosures
Events / information based on criteria of materiality (Corresponding to Para B of Part A
of Schedule III of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015)

Sl. no.	Type of event / information	Timeline for Disclosure	Criteria for determining Materiality
1	Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.	Within 12 hours*	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; or 3. The 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 Company; • 2% 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; • 5% of the Average of Absolute Value of Profit or
2	Any of the following events pertaining to the listed entity: (a) arrangements for strategic, technical, manufacturing, or marketing tie-up; or (b) adoption of new line(s) of business; or (c) closure of operation of any unit, division or subsidiary (in entirety or in piecemeal).	Within 12 hours*	
3	Capacity addition or product launch.	Within 12 hours*	
4	Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.	Within 24 hours	
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.	Within 12 hours* (for agreements where listed entity is a party)	

Sl. no.	Type of event / information	Timeline for Disclosure	Criteria for determining Materiality
		Within 24 hours (for agreements where listed entity is not a party)	Loss After Tax, as per the last three audited consolidated financial statements of the Company as explained in Annexure IV of the SEBI Circular dated 13.07.2023. 4. The event or information is considered material in the opinion of the Board of Directors of the Company. 5. The event or information is considered material in the opinion of the Board of Directors of the Company.
6	Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.	Within 24 hours	
7	Effect(s) arising out of change in the regulatory framework applicable to the listed entity.	Within 24 hours	
8.	Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the listed entity.	Within 24 hours	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; or 3. The 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

Sl. no.	Type of event / information	Timeline for Disclosure	Criteria for determining Materiality
			financial statements of the Company; • 2% 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; • 5% of the Average of Absolute Value of Profit or Loss After Tax, as per the last three audited consolidated financial statements of the Company as explained in Annexure IV of the SEBI Circular dated 13.07.2023. 4. The event or information is considered material in the opinion of the Board of Directors of the Company. 5. The event or information is considered material in the opinion of the Board of Directors of the Company.
9	Frauds or defaults by employees of the listed entity which has or may have an impact on the listed entity.	Within 24 hours	A. Fraud/default which involves or is expected to involve individually an amount of rupees one crore or above. B. Any other criteria applicable as per SEBI Listing Regulations or as determined by the CFO and Company Secretary. C. The event or information is considered material in

Sl. no.	Type of event / information	Timeline for Disclosure	Criteria for determining Materiality
			the opinion of the Board of Directors of the Company.
10	Options to purchase securities including any ESOP/ESPS Scheme	Within 12 hours*	Presently, the Company has no Scheme for ESOP / ESPS by employees. As and when any Scheme is approved, the criteria will be laid down by the Board as per SEBI regulations, if any.
11	Giving of guarantees or indemnity or becoming a surety by whatever name called for any third party.	Within 12 hours*	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; or 3. The 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 Company; • 2% 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;
12	Granting, withdrawal, surrender, cancellation or suspension of key Licenses or regulatory approvals.	Within 24 hours	
13	Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority.	Within 12 hours*	
C	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	Within 24 hours	

Sl. no.	Type of event / information	Timeline for Disclosure	Criteria for determining Materiality
	position and to avoid the establishment of a false market in such securities.		• 5% of the Average of Absolute Value of Profit or Loss After Tax, as per the last three audited consolidated financial statements of the Company as explained in Annexure IV of the SEBI Circular dated 13.07.2023. 4. The event or information is considered material in the opinion of the Board of Directors of the Company. 5. The event or information is considered material in the opinion of the Board of Directors of the Company.
D	Without prejudice to the generality of para (A), (B) and (C) above, the listed entity may make disclosures of event/information as specified by the Board from time to time.	Timeline as specified by the Board.	

* Note: In case the event or information emanates from a decision taken in a meeting of Board of Directors, the same shall be disclosed within 30 minutes from the closure of such meeting as against the timeline indicated in the table above.

Future agreements (Reg. 30A(1)): the parties to the agreements shall inform the listed entity about the agreement to which such a listed entity is not a party within two working days of entering into the agreement or signing an agreement to enter into such agreements.

Sd/-
(Urvashi Tilakdhar)
Senior Managing Director

Dated: 24.12.2025