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# SHIVAGARICO IMPLEMENTS LTD

## POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURES

(Last Modification on 27<sup>th</sup> May, 2025)

### 1. BACKGROUND

The Securities and Exchange Board of India (“SEBI”), vide its notification dated September 2, 2015, introduced the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), which came into effect from December 1, 2015.

The Listing Regulations require every listed entity to formulate a policy for determination of material events or information for the purpose of making appropriate disclosures to stock exchanges and investors.

Accordingly, Shivagarico Implements Ltd has framed and adopted this “Policy for Determination of Materiality for Disclosures” (“Policy”) in compliance with the applicable provisions of the Listing Regulations.

### 2. OBJECTIVE

The objective of this Policy is to ensure timely and adequate disclosure to the Stock Exchanges of any event or information which, in the opinion of the Board of Directors of the Company, is material based on the criteria specified under Clause (ii) of Sub-regulation (4) of Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

This Policy shall come into effect from May 27, 2025 and shall be applicable to the Company from the said date. The Policy shall also be hosted on the website of the Company in accordance with the applicable provisions of the Listing Regulations.

### 3. MATERIAL EVENTS OR INFORMATION TO BE DISCLOSED TO THE STOCK EXCHANGE(S)

Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with Schedule III thereto, classifies certain events and information as material, which may have a significant impact on the operations, performance, or reputation of the Company. In accordance with the said provisions, the Company shall make timely disclosures of such events and information to the Stock Exchange(s).

The categories of events and information, as prescribed under the Listing Regulations, are broadly classified as follows:

- A. Events specified in Para A of Part A of Schedule III of the Listing Regulations shall be deemed to be material events and shall be disclosed to the Stock Exchange(s) without application of any guidelines for materiality. Such events are mandatorily required to be disclosed irrespective of the extent or impact of the occurrence of the event.

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- B.** Events specified in Para B of Part A of Schedule III of the Listing Regulations shall be disclosed to the Stock Exchange(s) upon application of the materiality criteria specified under Regulation 30(4) of the Listing Regulations. The determination of materiality shall be made by the authorised Key Managerial Personnel of the Company.
  - C.** Events or information specified in Para C of Part A of Schedule III of the Listing Regulations shall be disclosed based on the assessment made by the Company in accordance with the applicable provisions of the Listing Regulations.
  - D.** Any other event or information which, in the opinion of the Board of Directors of the Company, is considered material.
  - E.** Any event or information with respect to subsidiaries of the Company that is material for the Company in terms of the Listing Regulations.

#### **4. REPORTING OF MATERIAL EVENTS OR INFORMATION**

The Company shall disclose to the Stock Exchange(s) all events or information that are material in terms of Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with Schedule III thereto, within the timelines prescribed under the Listing Regulations, as amended from time to time.

Such disclosures shall also be made in accordance with the relevant circulars, guidelines, and directions issued by the Securities and Exchange Board of India (“SEBI”) from time to time.

#### **5. GUIDELINE/CRITERIA FOR DETERMINATION OF MATERIALITY OF EVENTS/INFORMATION**

The materiality of events/information prescribed under Regulation 30(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be determined based on the criteria specified under Clause (i) of Regulation 30(4) of the Listing Regulations, as set out below:

1. The omission of an event or information is likely to result in discontinuity or alteration of an event or information already available in the public domain; or
2. The omission of an event or information is likely to result in significant market reaction if such omission were to come to light at a later stage; or
  
3. The omission of an event or information, where the value or expected impact in terms of value exceeds the lower of the following thresholds:
  - a. 2% of turnover, as per the last audited consolidated financial statements of the Company; or
  - b. 2% of net worth, as per the last audited consolidated financial statements of the Company, except where the arithmetic value of the net worth is negative; or
  - c. 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;

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4. In cases where the criteria specified in sub-clauses (a), (b), and (c) above are not applicable, an event or information may be treated as material if, in the opinion of the Board of Directors of the Company, such event or information is considered material.

## **6. AUTHORITY TO DETERMINE MATERIALITY OF AN EVENT OR INFORMATION AND MAKING DISCLOSURES TO THE STOCK EXCHANGES**

The Chief Financial Officer and the Company Secretary of the Company shall be the Key Managerial Personnel authorised, pursuant to Regulation 30(5) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for the purpose of determining the materiality of any event or information.

The said Key Managerial Personnel shall also be responsible for ensuring timely disclosure of such material events or information to the Stock Exchange(s) in accordance with the provisions of the Listing Regulations and applicable circulars issued by SEBI from time to time.

## **7. MISCELLANEOUS**

- The Company shall disclose all intimations made to the Stock Exchange(s) under Regulation 30 of the Listing Regulations on its website. Such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter shall be preserved in accordance with the archival policy of the Company, as disclosed on its website.
- This Policy for determination of materiality shall not be construed as diluting any requirement prescribed under the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any other applicable laws, rules, or regulations.
- The Company shall disclose all events or information with respect to its subsidiaries, if any, which are material for the Company in accordance with the provisions of the Listing Regulations

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