

POLICY FOR DETERMINING MATERIALITY OF EVENTS/INFORMATION

This Policy has been framed in accordance with the requirements of the Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Regulations") as amended time to time.

The objective of this policy is to determine the "Materiality of Information of the Company" for the purpose of disclosure to stock exchanges and to provide the Governance Framework on such information.

Definitions

"Company" means Suprajit Engineering Limited.

"LODR" means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

"Material Event/ information" means event / information determined based on application of the guidelines for materiality referred to in sub-regulation (4) of Regulation 30 of the Listing Regulations.

"Material Subsidiary" shall mean a subsidiary, whose income or net worth exceeds ten percent of the consolidated income or net worth respectively, of the Company and its subsidiaries in the immediately preceding accounting year.

"Policy" means 'Policy for Determination of Materiality of Event or Information'.

"Subsidiary" or **"Subsidiaries"** means subsidiary or subsidiaries of the Company.

AUTHORISED PERSONS:

The Key Managerial Personnel (KMPs) consisting of the Chairman, Managing Director, Chief Strategy Officer and Chief Financial Officer and Company Secretary are authorised to determine whether the event/information is material or not and in turn about its timeline for disclosure based on the category of information as specified below to the stock exchanges, subject to such information being placed prior to or at the immediate Board Meeting held after the said information being made public.

MATERIALITY ASSESSMENT

1. Any information or event, whether positive or negative, should be regarded as “material” if it meets the criteria for materiality set out in this Policy, or is deemed to be material under the Applicable Laws. Materiality will be determined on a case-to-case basis depending on specific facts and circumstances relating to the information/event, and Applicable Law.
2. Events listed in Para A – Part A of Schedule III of Listing Regulations, shall be deemed to be material and shall be disclosed without application of materiality criteria.
3. Events/information listed in Para B – Part A of Schedule III of the Listing Regulations, shall be considered material if it satisfies the materiality criteria stated below:

Criteria

- (a) the omission of such event or information is likely to result in discontinuity or alteration of event or information already available publicly; or
- (b) the omission of such event or information is likely to result in significant market reaction if the said omission came to light at a later date; or
- (c) 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 Company’s last audited annual consolidated financial statements;
 - ii. two percent of net worth, as per the Company’s last audited annual consolidated financial statements, 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 Company’s last three audited annual consolidated financial statements.
4. To determine the materiality of other events/information which are not covered under above criteria, relevant criteria, as determined by the Board of Directors of the Company, shall be considered.
5. Notwithstanding anything stated above, the Board of Directors of the Company may prescribe any other criteria, from time to time, to determine materiality of events/information under this Policy. However, such criteria shall not dilute the requirements prescribed under the Listing Regulations.



TIMELINES FOR DISCLOSURE

The Company shall disclose all events or information within the timelines specified in the Applicable Laws.

DISCLOSURE OF THE POLICY

This Policy will be uploaded on the website of the Company.

EVENTS/INFORMATION WITH RESPECT TO SUBSIDIARIES

The Company shall disclose all events or information which are material in nature with respect to Subsidiaries as are required under Applicable Laws.

LIMITATION AND AMENDMENT

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

This policy shall be periodically reviewed and updated.

Amended and effective from August 12, 2023