

Shreenath Investment Company Limited

Policy for Determination of Materiality for Disclosure of Information/Events to the Stock Exchanges

1. Preamble

The Board of Directors of Shreenath Investment Company Limited. ("The Company") has adopted the Policy for Determination of Materiality and Disclosure to ascertain the requirement of disclosure of events or information to stock exchange(s) and defining criteria for determining materiality of events and information specified under clause (ii) of sub regulation (4) of Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. This Policy also incorporates the principles and operational guidance provided in the **Industry Standards on Regulation 30** issued by SEBI on February 25, 2025 (the "Industry Standards Framework"). This Policy is subject to the Board's review and changes, as may be appropriate, in conformity with the requirements of the SEBI LODR Regulations, as amended from time to time.

2. Objective

This policy is framed as per requirements of Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 [SEBI Regulations] to enable investors to make well-informed investment decisions on basis of timely, adequate and accurate disclosure of information/event on an ongoing basis.

The Policy provides a framework for identification and disclosure of material and unpublished price sensitive events or information that may impact the performance, operations or securities of the Company. It also lays down the guidelines for determining materiality of events/information and ensures compliance with Regulation 30 of the SEBI LODR Regulations and related circulars, industry standards and guidelines issued by SEBI from time to time.

3. Definitions

- a. **"Board" or "Board of Directors"** means the collective body of the Directors of the Company as constituted from time to time;
- b. **"Company"** shall mean Shreenath Investment Company Limited;
- c. **"Key Managerial Personnel" or "KMP"** means the personnel as defined under Section 2(51) of the Companies Act, 2013, read with the rules and regulations issued thereunder, as amended from time to time;

- d. "Material Event/s" means those event/s specified in:**
- i.** Para A of Part A of Schedule III of the SEBI LODR Regulations, being deemed material events, which the Company shall compulsorily disclose;
 - ii.** events specified in Para B of Part A of Schedule III of the SEBI LODR Regulations, which the Company shall disclose, based on guidelines for materiality as specified in 4 herein;
 - iii.** events specified in Para C of Part A of Schedule III of the SEBI LODR Regulations;
 - iv.** in case the Company has issued non-convertible securities, events specified in Part B of Schedule III of the SEBI LODR Regulations;
 - v.** any event which may have a material effect on the Company;
 - vi.** any event or information if in the opinion of the board of directors of the Company, is considered material.
- e. "Normal trading hours"** shall mean time period for which the recognized stock exchanges are open for trading for all investors.
- f. "Main Stream Media"** includes print or electronic media that have wide and credible reach, as clarified in the Industry Standards Framework.
- g. "Officer"** means the Managing Director (MD), Chief Financial Officer (CFO), Company Secretary (CS), and any other employee designated in writing by the MD, who are responsible for identifying, reporting, and escalating potential material events/information to the authorised KMP for disclosure determination.
- h. "Ordinary course of business" or "normal course of business"** means all activities that are necessary, normal or incidental to the business of the Company and are permitted by objects of the Company. These would also include common practices, historical practices and customs of commercial transactions with a pattern of frequency.
- i. "Policy"** means this Policy for Determination of Materiality for Disclosure of Information/Events to the Stock Exchanges;
- j. "SEBI"** means the Securities and Exchange Board of India;
- k. "Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956, as amended from time to time;

- I. **"Stock Exchanges"** means stock exchanges on which the Securities of the Company are listed; and

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the SEBI LODR Regulations or any other applicable law or regulation to the extent applicable to the Company.

4. Criteria for Disclosure:

The following criteria shall be considered by the Company while determining the materiality of events/information:

- (a) The omission of an event or information, which is likely to result in significant market reaction if the said omission came to light at a later date; or
- (b) The omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; 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 last audited financial statements of the Company;
 - (ii) two percent of net worth, as per the last audited financial statements of the Company, 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 last three audited financial statements of the Company.
- (d) whether the event/information is likely to have a bearing on performance or operation of the Company or have a material impact on the business or the Company; or
- (e) whether any continuing event or information becomes material or in cases where the criteria specified in sub-clauses (a) to (d) above are not applicable, whether an event/information may be treated as being material in the opinion of the Board.

The Managing Director (MD) of the Company along with the Chief Financial Officer (CFO) is authorized to determine the materiality of an event or information under this Policy and the SEBI LODR Regulations and to make relevant disclosures to the Stock Exchanges required under the SEBI LODR Regulations. The quantitative factors which may be considered while determining the materiality of an event or information would be those as indicated in clause 4 sub-clause (iii) of this policy. All questions about this Policy should be directed to the MD / CFO / Company Secretary.

5. Applicability:

- 5.1 The events specified in Para A of Part A of Schedule III of the Listing Regulations are deemed to be material events. The Company shall make disclosure of such events without application of any materiality criteria within the prescribed timelines.

5.2 The events specified in Para B of Part A of Schedule III of the Listing Regulations shall be disclosed by the Company to the Stock Exchanges, if considered material as per the materiality threshold specified under SEBI Regulation 30 of the Listing Regulations as may be issued/ amended from time to time.

5.3 Any other information or event or major development likely to affect the business which are exclusively known to the Company and which may be necessary to be disclosed to enable holders of Securities of the Company to appraise its position and avoid establishment of false market in the Securities also needs to be disclosed.

6. Authorization and co-ordination for Disclosure

Pursuant to Regulation 30(5) of the SEBI LODR Regulations, the MD/CFO are authorized by the Board for the purpose of determining materiality of an event or information and the Company Secretary is authorized for making disclosures to the Stock Exchange(s) under this Policy.

Once the MD in consultation with the CFO (in cases where materiality thresholds are applicable) decides to make a disclosure under this Policy, it will be forthwith informed to the Company Secretary for dissemination to stock exchanges within the stipulated timelines. In the absence of the Company Secretary, the dissemination can be made by the MD or CFO.

7. The contact details of the said KMPs will be disclosed to the stock exchanges as well as uploaded on the website of the Company.

8. Time of Disclosure

Disclosures shall be made as soon as possible but within the prescribed timelines from the occurrence of the event/ information. However, in cases where the disclosure cannot be made within the prescribed timelines due to reasons as mentioned in the applicable SEBI Circular(s)/ Industry Standards Note(s), the Company will disseminate the same along with an explanation for the delay.

The broad principle governing the timelines for disclosure of material event/ information to Stock Exchanges, is encapsulated in the table below:

Material Event / Information	Statutory Timeline
Event or information which pertains to a decision taken at the meeting of Board of Directors (if the Board Meeting concludes during normal trading hours)	within 30 minutes from the closure of relevant Board meeting
Event or information which pertains to a decision taken at the meeting of Board of Directors (if the Board Meeting concludes after normal trading hours but more than three hours before the beginning of the normal trading hours of the next trading day)	within 3 hours from the closure of relevant Board meeting
Board meeting concludes less than 3 hours before next trading day's start	Before the next trading day's commencement
Event or information which emanates from within the Company	within 12 hours of occurrence of event or information
Event or information which does not emanate from within the Company	within 24 hours of occurrence of event or information
Legal proceedings, arbitrations, claims, or tax litigations where the claim amount exceeds the quantitative thresholds	Within 72 hours of the Company becoming aware of the claim/order
Event or information for which timelines have already been specified in Part A of Schedule III of SEBI Listing Regulations	within the respective timelines specified therein

The timelines stipulated in this Regulation for making disclosures to the stock exchanges would begin once an officer of the Company has become aware of the occurrence of an event / information, through credible and verifiable channels of communication.

9. Details of Disclosure

The Company will disclose details for the events set out in Para A and Para B of Part A of Schedule III of the SEBI LODR Regulations, in accordance with the guidelines prescribed under applicable SEBI Circular(s), as amended from time to time. Further, the Company shall ensure that the disclosures are appropriate and would be consistent with the facts of each event being disclosed by the Company.

10. Updation

With respect to the disclosures made pursuant to this Policy, the Company shall also make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations there for.

11. Disclosures other than listed events/information

In case where an event occurs or an information is available with the Company, which has not been indicated in Para A or B of Part A of Schedule III of the SEBI LODR Regulations, but which may have material effect on it, the Company shall make adequate disclosures in regard thereof.

12. Manner of Disclosure

Any information to be disseminated, including responses to any queries raised by the stock exchanges, is required to be given in the manner prescribed by the Stock Exchanges in this regard.

13. Dissemination of the Policy

A copy of the Policy shall be put up on the website of the Company.

14. Review of the Policy

The Policy shall be subject to review of the Board, and the Managing Director will be authorized to amend it suitably, as may be deemed necessary in accordance with any regulatory requirements or amendments.

Version No.	Date of Revision	Description of Change	Authorized By
1.0	12 th July,2023	Initial policy	Board
2.0	12 th February,2026	Comprehensive revision to align with SEBI LODR Amendments including applicable Industry Standards Framework.	Board