

**PRAJ INDUSTRIES LIMITED**

**POLICY ON DETERMINATION OF MATERIALITY OF EVENTS /  
INFORMATION**

<b>Versions of the policy</b>			
<b>Sr. No.</b>	<b>Particulars</b>	<b>Board approval date</b>	<b>Effective date</b>
1.	Initial adoption	29 <sup>th</sup> October, 2024	29 <sup>th</sup> October, 2024
2.	1 <sup>st</sup> amendment (current version)	25 <sup>th</sup> October, 2024	25 <sup>th</sup> October, 2024

<b>Index</b>		
<b>Sr. No.</b>	<b>Particulars</b>	<b>Page No.</b>
1.	Introduction	2
2.	Objective	2
3.	Events/ Information Covered under this Policy	2
4.	Criteria while determining the materiality of information/ event	3
5.	Disclosure requirements	4

## **1. INTRODUCTION**

This policy on determination of materiality of events/information is framed pursuant to the Regulation 30(4) of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (Listing Regulations) as amended from time to time.

## **2. OBJECTIVE**

Praj being a listed entity, is obligated to comply with the disclosure requirements under the Listing Regulations and is committed to the premise that all persons investing in the publically traded securities have equal right to access information that may affect their investment decisions and believes that full and fair disclosure of material information to the public is the cornerstone to the integrity of the Capital Market.

## **3. EVENTS/ INFORMATION COVERED UNDER THIS POLICY**

- a) All the events covered in Para B of Part A of Schedule III to the Listing Regulations which are;
- i. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
  - ii. Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division (entirety or piecemeal).
  - iii. Capacity addition or product launch.
  - iv. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
  - v. Agreements (viz. loan agreement(s) (as a borrower) 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.
  - vi. 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.
  - vii. Effect(s) arising out of change in the regulatory framework applicable to the listed entity.

- viii. Litigation(s) / dispute(s) / regulatory action(s) with impact.
  - ix. Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.
  - x. Options to purchase securities including any ESOP/ESPS Scheme.
  - xi. Giving of guarantees or indemnity or becoming a surety for any third party.
  - xii. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
- b) 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 position and to avoid the establishment of a false market in such securities.
- c) Any other information/event as may be specified in Para B of Part A of Schedule III to the Listing Regulations from time to time.

#### **4. CRITERIA WHILE DETERMINING THE MATERIALITY OF INFORMATION/EVENT**

- (a) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
- (b) 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;
- (c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
  - (1) two percent of turnover, as per the last audited consolidated financial statements of the listed entity;
  - (2) two percent 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;
  - (3) five percent 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;

(d) In case where the criteria specified in sub-clauses (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the listed entity, the event or information is considered material.

## **5. DISCLOSURE REQUIREMENTS**

Pursuant to the provisions of Regulation 30(6) of the Listing Regulations, all the events / information which become material in terms of the provisions of Regulation 30 read with Para A and Para B of Part A of Schedule III of the Listing Regulations, shall be disclosed to the Stock Exchanges as soon as reasonably possible but not later than the following:

(i) thirty (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;

(ii) twelve (12) hours from the occurrence of the event or information, in case the event or information is emanating from within the listed entity;

(iii) twenty four (24) hours from the occurrence of the event or information, in case the event or information is not emanating from within the listed entity:

Provided that disclosure with respect to events for which timelines have been specified in Part A of Schedule III of the Listing Regulations shall be made within such timelines.

Provided further that in case the disclosure is made after the timelines specified under Regulation 30, the Company shall, along with such disclosure provide the explanation for the delay.

**For Praj Industries Limited**

Sd/-

**Dr. Pramod Chaudhari**  
**Executive Chairman**

**Date: 25<sup>th</sup> October, 2024**