

## **SARTHAK METALS LIMITED**

### *Policy on Criteria for Determining Materiality of Events*

(EFFECTIVE DATE OF THE POLICY: 01<sup>ST</sup> JUNE, 2026)

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Version Control

Version	Approval Date	Approved by
1	22 <sup>nd</sup> May, 2026	Board of Directors

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## I. Objective

The policy is framed in accordance with the requirements of the Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations).

The objective of the policy is to determine materiality of events or information of the Company and to ensure that such information is adequately disseminated in pursuance with the Regulations and to provide an overall governance framework for such determination of materiality.

## II. Definition

“Material Event” or “Material Information” shall mean such event or information as set out in the Schedule III of (Listing Obligations and Disclosure Requirements) Regulations, 2015 or as may be determined in terms of Clause 3 of the policy.

“Material Subsidiary” shall mean any subsidiary company of the Company which is or has been determined as a material subsidiary as per the provisions of the Regulations.

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

## III. Guidelines for Determining Materiality of Events or Information

Events / information shall be considered as material if it meets any of the following criteria:

- a) the event or information is in any manner unpublished price sensitive information;
- b) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly;
- c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
  - a. two percent of turnover, as per the last audited consolidated financial statements of the listed entity;
  - b. 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;
  - c. 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;and

- d) any other event/information which is treated as being material in the opinion of the Board of Directors of the Company.

#### IV. Disclosures of Events or Information

- a) Events specified in Para A of Part A of Schedule III of the Regulations are deemed to be material events (including any statutory modification/amendment thereof) and the Company shall make disclosure of such events or information as soon as reasonably possible and not later than twelve (12)/ twenty-four (24) hours from the occurrence of such event or information in the following manner:
- inform the stock exchanges in which the securities of the Company are listed;
  - upload on the corporate website of the Company.

Provided that in case the disclosure is made after twelve (12)/ twenty-four (24) hours of occurrence of such event or information, the Company shall, along with such disclosure(s) provide an explanation for delay:

Provided further that disclosure with respect to events specified in sub-para 4 of Para A of Part A of Schedule III of the Regulations shall be made within 30 minutes of the conclusion of the board meeting.

- b) The Company shall make disclosure of events as specified in Para B of Part A of Schedule III of the Regulations based on application of guidelines for determining materiality as per clause 3 of the Policy.
- c) The Company shall with respect to disclosures referred to in this regulation, make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.
- d) The Company shall disclose all events or information with respect to its Material Subsidiaries also.
- e) The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information and on its own initiative. Further it shall confirm or deny any event or information to stock exchange(s) reported in the media.
- f) In case where an event occurs or information is available with the Company, which has not been indicated in Para A or Para B of Part A of Schedule III, but which may

have material effect on it, the Company will make adequate disclosures in regard thereof also.

## V. Amendments

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

## VI. Scope and Limitation

In the event of any conflict between the provisions of this Policy, Companies Act, 2013 and Regulations or any other statutory enactments, rules, the provisions of Companies Act, such Regulations, or any such statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the policy and the rest of the policy shall remain in force.

## VII. Dissemination of Policy

A copy of this policy along with the contact details of the person authorized by the Board for determination of the materiality of the events or information shall be hosted on the web-site of the Company.

Contact details of persons authorized to determine materiality of an event / information pursuant to the Company's 'Policy for determination of materiality of events and ensure disclosures of the same are made to stock exchange(s):

<b>Name</b>	:	<b>Mayur Bhatt</b>
<b>Designation</b>	:	<b>Whole-Time Director and CEO</b>
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