

**POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS/ INFORMATION
(Under Regulation 30(4) (ii) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015**

1. PREAMBLE

Regulation 30(4)(ii) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”), mandates a listed entity to frame a policy for determination of materiality of events or information.

Bansal Roofing Products Limited (“the Company”) has adopted this Policy to ensure timely, adequate and accurate disclosure of material events and information to the Stock Exchanges. This Policy shall be read in conjunction with applicable provisions of SEBI LODR Regulations, as amended from time to time, and the Company’s Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

2. CRITERIA FOR DETERMINATION OF MATERIALITY

Materiality shall be determined on a case-to-case basis based on the following:

I. Qualitative Criteria

An event/information shall be considered material if:

- a) Omission is likely to result in discontinuity or alteration of publicly available information;
- or
- b) Omission is likely to result in significant market reaction if disclosed later.

II. Quantitative Criteria

An event/information shall be considered material if its value or expected impact exceeds the lower of:

- 2% of turnover (as per last audited consolidated financial statements)
- 2% of net worth (as per last audited consolidated financial statements)
- 5% of average absolute PAT (last 3 financial years)

III. Discretionary Criteria

Where above criteria are not applicable, an event may be considered material based on the opinion of the Board of Directors or Authorised Persons.

◆ **Important Clarification**

The above quantitative thresholds shall **primarily apply to events specified under Para B of Part A of Schedule III** of the SEBI LODR Regulations.

Events specified under **Para A (Deemed Material Events)** shall be disclosed **without application of materiality thresholds**, subject to principles of materiality and guidance provided under this Policy.

3. DISCLOSURE OF EVENTS / INFORMATION

The Company shall disclose events/information as per Schedule III of SEBI LODR Regulations:

Category 1 – Deemed Material Events (Para A)

Events shall be disclosed **without applying materiality criteria**.

Category 2 – Material Events (Para B)

Events shall be disclosed based on application of materiality criteria specified in Clause 2.

◆ Specific Guidance – Orders / Contracts

Awarding, bagging/receiving, amendment or termination of orders/contracts shall be considered in accordance with Para A of Part A of Schedule III.

However, **routine orders received in the ordinary course of business may not be disclosed individually**, provided that such orders:

- are not exceptional in size;
- are repetitive in nature;
- do not have strategic or reputational significance; and
- are not likely to materially impact the Company's operations, financials, or investor decision-making.

◆ Residual Clause

The Company shall also disclose any other event/information which is not explicitly covered but is necessary to enable investors to appraise the Company's position or to prevent establishment of a false market in its securities.

4. TIME LIMIT FOR DISCLOSURE

The Company shall disclose material events as follows:

- Within **30 minutes** of conclusion of Board Meeting (for Board decisions)
- Within **12 hours** (events originating within the Company)
- Within **24 hours** (events not originating within the Company)

Where disclosure is made after prescribed timelines, reasons for delay shall be provided.

5. AUTHORITY FOR DETERMINATION OF MATERIALITY

The Board has authorised the **Managing Director and Chief Financial Officer ("Authorised Persons")** to:

- Determine materiality of events
- Approve disclosures
- Seek internal/external guidance where required

6. PROCEDURE FOR DISCLOSURE

- Senior management shall promptly report any potential material event
- Authorised Persons shall assess materiality
- In case of doubt, external legal advice may be obtained
- The Company Secretary shall make disclosures to Stock Exchanges

◆ **Determination of Occurrence of Event**

An event/information shall be deemed to have occurred upon:

- approval by the competent authority; or
- execution of a binding agreement; or
- when the Company becomes aware of the same

whichever is earlier.

◆ **Additional Evaluation Factors**

While determining materiality, the following shall also be considered:

- Whether the event is in the normal course of business
- Whether it is repetitive in nature
- Whether it is significantly higher than usual transactions
- Whether it has strategic or reputational impact
- Whether disclosure would influence investor decision

7. POLICY REVIEW

The Policy may be reviewed periodically by the Authorised Persons. Any material changes shall require Board approval. In case of inconsistency, SEBI LODR Regulations shall prevail.

8. WEBSITE DISCLOSURE

The Policy and all disclosures shall be hosted on the Company's website for a minimum period of **5 years** and thereafter as per archival policy.

9. CONTACT DETAILS

Questions or clarifications about the Policy or disclosures made by the Company should be referred to the Company Secretary and Compliance Officer, who is in charge of administering, enforcing and updating this policy.

NAME & DESIGNATION	ADDRESS	PHONE NO	EMAIL
RITU K BANSAL Company Secretary & Compliance Officer	274/Palki 2, Samlaya Sherpura Road, Village:Pratapnagar, Taluka: Savli, Dist: Vadodara- 391520	8511148598	cs@bansalroofing.com

10. AMENDMENT

The Board reserves the right to amend this Policy in line with regulatory changes.
