



MSAFE EQUIPMENTS LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

Version	Approved by	Date of Approval	Description
1.1	Board of Directors	26.08.2025	Original Policy

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POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

1. BACKGROUND

With a view to enable investors to make well informed decisions, Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (*“Listing Regulation”*) requires every listed entity to make timely, adequate and accurate disclosure of any event or information which, in the opinion of its Board of Directors (*“Board”*) is material. Further, the sub-regulation 4 of Regulation 30 of listing regulation also provides for framing a policy for Determination of Materiality of events or information, based on the criteria specified therein.

Hence in view of the above, this Policy for Determination of Materiality of events or information (*“Policy”*) has been framed to provide necessary guidelines to the Board for determination of the materiality of events and information and to make timely, adequate and accurate disclosures of information or events which could affect the investment decisions of the investors

This Policy has been formulated in accordance with Clause (ii) of sub-regulation (4) of Regulation 30 of the Listing Regulations.

2. OBJECTIVE

The objectives of this Policy are as follows:

- a. To ensure that the Company complies with the disclosure obligations to which it is subject as a publicly-traded company as laid down by the SEBI Listing Regulations, various Securities Laws and any other legislations, as applicable.
- b. To ensure that the information disclosed by the Company is adequate, accurate, timely and transparent.
- c. To ensure that corporate documents and public statements are accurate and do not contain any misrepresentation.
- d. To protect the confidentiality of material/price sensitive information within the context of the Company’s disclosure obligations.
- e. To provide a framework that supports and fosters confidence in the quality and integrity of information released by the Company.

To ensure uniformity in the Company’s approach to disclosures, raise awareness and reduce the risk of selective disclosures.

3. DISCLOSURE OF MATERIAL EVENT OR INFORMATION

The Company shall within the prescribed time disclose all such material events to the Stock Exchanges where the Securities of the Company are listed as:

- a. Specified in **Para A of Part A of Schedule III** of the Listing Regulations without any application of guidelines for materiality as specified in sub regulation (4) of Regulation 30 of Listing Regulations;
- b. Specified in **Para B of Part A of Schedule III** of the Listing Regulations subject to application of guidelines for materiality as specified in sub regulation (4) of Regulation 30 of Listing Regulations;
- c. any other events/ information viz. any 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 information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities;
- d. 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 Listing Regulations, but which may have material effect on the Company, as determined by the Board of the Company or Authorized Persons in accordance with this Policy, the Company is required to make disclosures in regard thereof.
- e. In case an event or information is required to be disclosed by the Company in terms of the provisions of Regulation 30 of the Listing Regulations, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

4. CRITERIA FOR DETERMINING MATERIALITY

Materiality shall be determined on case to case basis depending on the specific facts and circumstances relating to the event/ information relevant to the Company. A particular event/ information will be considered as material in nature, if it substantially alters/ impacts the existing composition of revenue/ profits of the Company.

The board shall determine the materiality of event/ information in Para B of part A of Schedule III on the basis of criteria specified in sub regulation (4) of Regulation 30 of Listing Regulations.

The following criteria shall be considered by the Board for determining whether the events are material or not: -

- i) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or

- ii) 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.
- iii) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - two percent of turnover, as per the last audited consolidated financial statements of the listed Company;
 - two percent of net worth, as per the last audited consolidated financial statements of Listed Company, except in case the arithmetic value of the net worth is negative;
 - five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of Listed Company.
- iv) 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 Listed Company, the event or information is considered material.

The determination of the time when material event/information can be said to have occurred would depend either upon the stage of negotiation/discussion or approval and the events where no such negotiation/ discussion or approval is required, the event/information can be said to have occurred as and when the management become aware of the same.

5. TIMELINES FOR DISCLOSURE OF THE EVENT/INFORMATION

As per the Regulation 30(6) of the Listing Regulations, the Company shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions of the Listing Regulations as soon as reasonably possible and in any case not later than the following:

- a) thirty 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;

(Provided that in case the meeting of the board of directors closes after normal trading hours of that day but more than three hours before the beginning of the normal trading hours of the next trading day, the listed entity shall disclose the decision pertaining to the event or information, within three hours from the closure of the board meeting)

- b) twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the Company;
- c) twenty four hours from the occurrence of the event or information, in case the event or information is not emanating from within the Company.

6. AUTHORISED KEY MANAGERIAL PERSONNEL (KMP) FOR DETERMINING THE MATERIALITY

As per Regulation 30(5) of SEBI Listing Regulations, the following KMP's are hereby jointly and/or severally authorized by the Board of Directors for determining materiality of an event or information for the purpose of making disclosures to the Stock Exchanges:

Name	Designation	Email Id & Contact Details
Pradeep Aggarwal	Chairman & Managing Director	pa@msafegroup.com
Ajay Kumar Kanoi	Whole Time Director	ak@msafegroup.com
Rushil Agarwal	Executive Director	rushil@msafegroup.com
Sombir Bisla	Chief Financial officer	finance@msafegroup.com
Renuka Uniyal	Company Secretary and Compliance Officer	cs@msafegroup.com

7. DISCLOSURES

- a. Any event purported to be reportable under this Policy shall be informed to the Chairman & Managing Director or Chief Financial Officer or Company Secretary (KMPs) of the Company at cs@msafegroup.com on an immediate basis with adequate supporting data/ information to facilitate a prompt and appropriate disclosure. Any other event, even if not covered under the Regulations but is potentially of price sensitive nature, must also be informed, for further evaluation to the KMP.
- b. The Managing Director, Executive Director, Chief Financial officer and Company Secretary of the Company are authorized for ascertaining the materiality of events/ information considering its nature and to disclose it to the Stock Exchanges after taking into consideration various provisions of Listing Regulation and this Policy.
- c. The Company shall use the electronic facilities provided by the Stock Exchanges for dissemination of the said event/ information.
- d. Statutory time frames for disclosure shall be adhered to delay, if any, should be sufficiently explained along with the disclosure.
- e. The Compliance Officer shall make necessary disclosures to the Stock Exchange(s) and ensure overall compliance of this Policy.
- f. In case an event or information is required to be disclosed by the Company in terms of the provisions of this regulation, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

- g. The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information.
- h. All disclosures shall be available on the website of the Company for a period of 5 years.

8. AMENDMENT

Any change in the Policy shall be approved by the Board of the Company. The Board shall have the right to withdraw and/ or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

In case any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed thereunder and Listing Regulations (“Statutory Provisions”), the provisions of Statutory Provisions shall prevail.

9. DISSEMINATION OF THE POLICY

The policy shall be hosted on the website of the Company i.e. <https://msafegroup.com>
