



POLICY FOR DETERMINATION OF
MATERIALITY OF EVENTS/ INFORMATION
OF
BHAGIRADHA CHEMICALS & INDUSTRIES LIMITED

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I. BACKGROUND AND APPLICABILITY OF THE POLICY

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) requires every Listed Company to disclose events or information which, are material.

In this context, the following policy has been framed by the Board of Directors (“Board”) of Bhagiradha Chemicals and Industries Limited (“BCIL”/ “Company”) with the objective of determining materiality of events and information.

II. OBJECTIVE:

The Objectives of the Policy are as follows:

- a) To ensure compliance with the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.
- b) 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 Obligations and Disclosure Requirements) Regulation, 2015, various Security Laws and any other Regulations.
- c) To ensure that the information disclosed by the Company is timely and transparent.
- d) To ensure that the corporate documents and public statements are accurate and do not contain any misrepresentation.
- e) To ensure uniformity in the Company’s approach in disclosure, raise awareness between the stakeholders and reduce the risk of selective disclosures.

III. DISCLOSURE OF EVENTS OR INFORMATION

1. Events specified in Para A of part A of Schedule III of the Listing Regulations shall be deemed to be material events and the Company shall make disclosure of such events or information as soon as reasonably possible and in any case not later than timeline prescribed in the Listing Regulations.
2. For disclosure of certain events as specified in Para B of part A of Schedule III of the Listing Regulations to the Stock Exchanges, the following criteria shall be considered by the company for determining whether the events are material or not:
 - (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; 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:



- (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:
3. 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, but which may have material effect on it, the company shall make adequate disclosures of the same.
 4. The Company shall disclose all events or information with respect to subsidiaries which are material for the listed entity

IV. DISCLOSURE PROCESS

- The Board of Directors of the Company have authorized the Managing Director of the company to determine the materiality of an event or information as covered under Regulation 30 of the Listing Regulations and to make appropriate disclosure on a timely basis.
- Any event purported to be reportable under Regulation 30 of the Listing Regulations shall be informed to the Managing Director of the Company on an immediate basis with adequate supporting data/information to facilitate a prompt and appropriate disclosure.
- The Managing Director will then ascertain the materiality of such event(s) or information based on the above guidelines. On completion of the assessment, the company shall make appropriate disclosure(s) to the Stock Exchanges.
- The matters to which the materiality thresholds as mentioned under Regulation 30 of the Listing Regulations are not applicable and any other event not covered under the said Regulations but is potentially of price sensitive nature, the said events/information shall be placed before the Board of Directors by the Managing Director for ascertaining the materiality and making disclosures to the Stock Exchanges.
- The Company shall use the electronic facilities provided by the Stock Exchanges for dissemination of the information and may subsequently disclose the same via other media, including the press release, website, etc.
- All the material Events/ Disclosures shall be intimated to the Stock Exchanges within the timelines as prescribed under the Listing Regulations. Statutory timeframes for disclosure shall be adhered to. Provided further that in case the disclosure is made after the timelines specified under the Listing Regulations, the company shall, along with such disclosure provide explanation for the delay.
- All disclosures shall be available on the website of the Company for a period of 5 years.



V. WEBSITE

This Policy shall be disclosed on the website of the Company. Further, the Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under the Listing Regulations and such disclosures shall be made available on the website of the Company for a period of five years and thereafter as per the archival policy of the Company.

VI. MODIFICATION OF THE POLICY

This Policy is framed based on the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time. In case of any subsequent amendments to the Regulations which make any of the provisions in the Policy inconsistent, the provisions of the Regulations shall prevail. The Policy shall be reviewed and shall be modified by the Board so as to align the same with the amendments or to incorporate the statutory changes as may be felt appropriate by the Board of Directors.

This Policy is reviewed and updated by the Board at its meeting dated 13.02.2025
