



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

**SHAILY ENGINEERING PLASTICS LIMITED
SURVEY # 364/366,
RANIA, TA- SAVLI DIST- VADODARA-391780
CIN- L51900GJ1980PLC065554**

Details of Adoption/Amendments to the Policy				
Policy Adoption/Change effective date	Clause No	Particulars of the Adoption/Change	Board Approval date	Version of the Policy
1 st December 2015			29 th October 2015	Original
24 th May 2024		Change	24 th May 2024	Amended

1. Legal Framework

This Policy for Determination of Materiality of Events or Information (*the "Policy"*) is aimed at providing guidelines to the Management of Shaily Engineering Plastics Limited (*the "Company"*), to determine the materiality of events or information, which could affect the investment decisions and ensure timely and adequate dissemination of information to the stock exchanges.

This Policy has been formulated in accordance with the guidelines laid down by Securities Exchange Board of India ("SEBI"), under Regulation 30 of SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015 (*"Listing Regulations"*), with respect to disclosure of events and information.

Pursuant to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, issued on September 2, 2015, the Board of Directors of the Company in its meeting held on October 29, 2015, approved the *"Policy for Determination of Materiality of Events or Information"*. The Board shall review, and if found required, may amend this Policy from time to time.

This Policy will be applicable to the Company effective December 1, 2015.

2. Definitions

In this Policy, unless the context otherwise requires:

a) **"Board of Directors"** shall mean the Board of Directors of "Shaily Engineering Plastics Limited".

b) **"Chief Financial Officer"** shall mean the person heading and discharging the finance function of the listed entity as disclosed by it to the recognized stock exchange(s) in its filing under the SEBI Listing Regulations.

c) **"Key Managerial Personnel"** or **"KMP"** means Managing Director, Chief Financial Officer, and Company Secretary of Shaily Engineering Plastics Limited.

d) **"Promoter"** and **"Promoter Group"** shall have the same meaning as assigned to them respectively in clauses (oo) and (pp) of Regulation 2(1) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.

All other words and expressions used but not defined in this Policy, shall have the same meaning as defined in the SEBI Listing Regulations, and if not defined therein, then as per the Companies Act, 2013 or the Securities Contracts (Regulation) Act, 1956 or the Depositories Act, 1996 and/or the rules and regulations made thereunder, or any other Act and/or applicable laws or any statutory modification or re-enactment thereto, as the case may be.

3. Objective of the Policy

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 legislation, 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.
- f. To ensure uniformity in the Company's approach to disclosures, raise awareness and reduce the risk of selective disclosures.

4. Authority to Key Managerial Personnel

As per Regulation 30 Clause 5 of the Listing Regulations, the Board of Directors is empowered to severally authorised the Managing Director, Chief Financial Officer and Company Secretary (collectively known as Authorised Persons) for determining the materiality of any event or information and for the purpose of making disclosures to stock exchange(s) under the regulation from time to time.

Contact Details are as follows:

Name of Authorised Person	Designation	Contact number
Mr. Mahendra Sanghvi	Executive Chairman	+91 75748 05122
Mr. Laxman Sanghvi	Executive Director	+91 75748 05181
Mr. Amit Sanghvi	Managing Director	
Mr. Sanjay Shah	Chief Strategy Officer	

5. Guidelines for Assessing Materiality

Materiality will be determined on a case-to-case basis depending on the facts and the circumstances pertaining to the event or information.

The following criteria will be applicable for determining materiality of event or information:

- a. The omission of an event or information which is likely to:

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- i. result in a discontinuity or alteration of an event or information already available publicly; or
 - ii. result in significant market reaction if the said omission came to light at a later date.
 - b. The omission of an event or information, whose value or the expected impact in terms of value exceeds the lower of the following:
 - i. Two (2%) percent of **turnover**, as per the last audited consolidated financial statements of the Company; or
 - ii. Two (2%) percent of **net worth**, except in the case of the arithmetic value of the net-worth is negative, as per the last audited consolidated financial statements of the Company.
 - iii. Five (5%) percent of the **average absolute value of profit or loss after tax**, as per the **last three audited consolidated financial statements** of the Company.
- Accordingly, any transactions whose value exceeds the **lower** of above subclause (b) of i, ii or iii above, which has an annual impact in value, will be considered for the above purposes.
- c. In the opinion of the Board of Directors of the Company, the event / information as determined above ought to be disclosed.

6. Disclosure of Material Events/Type of Information

The information covered by this Policy shall include “information related to the Company’s business, operations, or performance which has a significant effect on securities investment decisions” (hereinafter referred to as “material information”) that the Company is required to disclose in a timely and appropriate manner by applying the guidelines for assessing materiality. Events or information specified in Para B of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed based on application of materiality criteria.

Events or information specified in Para A of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed without any application of the guidelines for materiality.

7. Obligations of Internal Stakeholders and KMPs for Disclosure

- a. Any event or information, including the information specified in Para A and Para B of Part A of Schedule III of the SEBI Listing Regulations shall be forthwith informed to the KMP(s) upon occurrence, with adequate supporting data/information, to facilitate a prompt and appropriate disclosure to the stock exchanges.
- b. The KMP(s) will then ascertain the materiality of such event(s) or information based on the above guidelines.
- c. On completion of the assessment, the KMP(s) shall, if required, make appropriate

disclosure(s) to the stock exchanges.

8. Guidance on timing of Disclosures

The Company shall disclose to the stock exchange(s) all events or information which are material in terms of the provisions of Regulation 30 of Listing Regulations as soon as reasonably possible and in any case 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.

Disclosure with respect to events for which timelines have been specified in Part A of Schedule III shall be made within such specified timelines and in case the disclosure is made after the specified timelines the Company shall provide an explanation for the delay along with the disclosure.

9. POLICY REVIEW

The KMP(s) may review the Policy from time to time. Material changes to the Policy will need the approval of the Board of Directors. Any subsequent amendment / modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.

10. SCOPE AND LIMITATION

In the event of any conflict between the provisions of this Policy and the Listing Agreement; Companies Act, 2013; Regulations or any other statutory enactments, rules, the provisions of such Listing Agreement / Companies Act, 2013 or 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.

11. DISSEMINATION OF POLICY

This Policy shall be hosted on the website of the Company and the address of such web link thereto shall be provided in the Annual Report of the Company.