



SAHAJANAND MEDICAL TECHNOLOGIES LIMITED

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

Name	Policy for determination of Materiality of events or Information
Approval Date	May 29,2025
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Effective date of the Policy	May 29,2025



Introduction

The Board of Directors (“**the Board**”) of Sahajanand Medical Technologies Limited (“**the Company**”) have adopted this Policy for determining materiality for facilitating prompt disclosure of events or information of the Company to the stock exchanges where the securities of the Company are listed, in accordance with the Regulation 30(4) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time (“**Listing Regulations**”).

Objective

The objective of this Policy are as follows:

- a) To ensure that the Company complies with the disclosure obligations as laid down by the 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 ensure uniformity in the Company’s approach to disclosures, raise awareness and reduce the risk of selective disclosures.

Interpretation

All the words and expressions used herein and not defined shall have the same meaning as ascribed to them in the Companies Act, 2013 (“**Act**”), Listing Regulations, Securities and Exchange Board of India Act, 1992 (“**SEBI Act, 1992**”), as amended, or rules and regulations made thereunder and any other relevant legislation applicable to the Company.

Determine Materiality of Events / Information

Regulation 30 of the Listing Regulations divides the event(s) / information requiring disclosure into three categories:

- 1) Event(s) / information that are deemed as Material as specified in “**Para A of Part A of Schedule III**” of the Listing Regulations, which shall be disclosed to the stock exchanges;
- 2) Event(s) / information as specified in “**Para B of Part A of Schedule III**” of the Listing Regulations which shall be disclosed if determined as material after application of materiality criteria as provided in this Policy.
- 3) Any other information/event viz. 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 other 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.

Criteria for determining Materiality

Materiality has to be determined on a case-to-case basis depending on specific facts and circumstances relating to the information/event. To determine whether information/event as specified in **Para B of Part A of Schedule III** is material in nature, the following criteria(s) shall be applied as mentioned below:

- 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;
- c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - i. 2% of turnover, as per the last audited consolidated financial statements of the Company;
 - ii. 2% of net worth, as per the last audited consolidated financial statements of the Company, except in case the arithmetic value of the net worth is negative;
 - iii. 5% of the average of absolute value of profit or loss after tax, as per the last 3 audited consolidated financial statements of the Company;
- d) in a case where the criteria specified in (a), (b) and (c) is not applicable, any event / information which in the opinion of the Board of the Company, is considered material shall be disclosed.

The Company shall disclose all events or information with respect to subsidiaries which are material for the Company.

Persons Responsible for Disclosure

The Board of the Company have authorised Managing Director, Chief Executive Officer, Chief Financial Officer and Company Secretary & Compliance Officer (“**Authorised Persons**”) in terms of Regulation 30(5) of Listing Regulations to determine the materiality of an event or information, and make appropriate disclosure to the stock exchanges and also on the Company’s website on a timely basis.

In order to assist the Authorised Persons, the Board has further authorised Senior Management (*as identified by the Company*) to decide on the materiality (*based on the Criteria for determination of materiality*) of the event/ information in consultation with respective Operations / HoDs and on the basis of their guidance/decision, the Authorised Persons would then take a final decision on the disclosure.



Details of such Authorised Persons shall be disclosed to stock exchanges and shall be made available on the website of the Company.

Further, if any Director or employee of the Company becomes aware of any material event or information, such Director or employee should report such potential material event or information to the Authorised Persons / Senior Management thereby enabling them to determine materiality of said event or information for disclosure to stock exchanges.

On receipt of communication of any potential material event or information, the Authorised Person shall review the materiality of event or information in accordance with this Policy and make necessary disclosures to stock exchanges.

Timeline for Disclosures

The Company shall disclose all events or information within the timelines specified in the regulation 30(6) of the Listing Regulations.

Disclosures with respect to events / information for which timelines have been specified in **Para A of Part A of Schedule III** shall be made within such timelines.

In case the disclosure is made after the timelines specified, the Company shall, along with such disclosure provide the explanation for the delay.

The Company shall disclose all further material developments with respect to the disclosures referred to in this Policy on a regular basis, till the event is resolved / closed, with relevant explanations.

Further, the Company shall provide specific and adequate reply to all questions raised by stock exchange(s) with respect to any events / information.

Website Disclosures and Archival

The Policy shall be uploaded on the website of the Company at www.smtpl.com

The event / information disclosed to the stock exchanges under this Policy shall also be placed on the website of the Company for a minimum period of 5 years or for such other period as prescribed by the Listing Regulations and /or the Securities Laws as defined in the Listing Regulations.

After completion of the minimum period of 5 years or such other period as prescribed by the Listing Regulations and/or Securities Laws, the events or information shall be archived by the Company as per the Preservation and Archival Policy of the Company.

Policy Review

- i) This Policy is framed based on the provisions of the Listing Regulations. In case of any subsequent changes in the provisions of the Listing Regulations, which makes any of the



provisions in the Policy inconsistent with the Listing Regulations, then the provisions of the Listing Regulations would prevail over the Policy.

- ii) Any change, amendment, or addition to this Policy shall require prior approval of the Board. However, the Company Secretary is authorized to make amendments to this Policy to give effect to any changes or amendments notified by Ministry of Corporate Affairs and the Securities and Exchange Board of India. Such amendments shall be placed before the Board for noting and ratification at its subsequent meeting.
- iii) The Company Secretary in coordination with Chief Financial Officer of the Company shall review this Policy periodically and recommend any proposed changes to the Board for approval.

Scope and Limitation

In the event of any conflict between the provisions of this Policy and the Listing Regulations or the Act or any other relevant legislation/ regulation applicable to the Company, the provisions of the Listing Regulations or the Act or such other relevant law / regulation shall prevail over this Policy.
