



SSSMEHTA INDUSTRIES LIMITED

CIN: U24109JH2021PLC017679

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POLICY FOR DETERMINING MATERIALITY OF EVENTS/INFORMATION

[Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Schedule VI of the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018]

This Policy for Determining Materiality of Events/Information ("Policy") has been adopted by the Board of Directors ("Board") of SSSMehta Industries Limited ("Company") at its meeting held on 25.07.2026.

PART A

MATERIALITY FOR CONTINUOUS DISCLOSURES UNDER THE SEBI LISTING REGULATIONS, 2015

1. Objective

Securities and Exchange Board of India ("SEBI") has issued the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 (the "Listing Regulations"). In terms of Regulation 30(4)(ii), the Board of Directors of the Company has adopted this Policy for determining materiality for disclosures (this "Policy") at its meeting held on 25.07.2026 for determination of materiality of events or information ("Material Information"), to enable the Company to promptly disclose such information or event to the Stock Exchange(s), pursuant to the Listing Regulations.

The Policy sets out the guidelines for identification of events or information within the Company which are deemed to be material in the opinion of the Board of Directors.

2. Authorised Person

Regulation 30(5) of the Listing Regulations provides that the Board of Directors of the listed entity shall authorise one or more Key Managerial Personnel for the purpose of determining materiality of an event or information and for making disclosures to the Stock Exchange(s) under the relevant provisions of the Listing Regulations, and the contact details of such personnel shall also be disclosed to the Stock Exchange(s) and on the listed entity's website.

Accordingly, the Board of Directors has authorised Mr. Sumit Kumar Mehta, Managing Director, for the purpose of determining materiality of an event or information and making disclosures to the Stock Exchange(s). The materiality of the event or information will be decided in consultation with the business heads, plant heads, project heads, and senior management personnel or persons connected with the event or information.

3. Powers and Responsibilities of the Authorised Person for determining material events or information within the Company:

- To review and assess the materiality of an event that may qualify as 'material' and may require disclosure, on the basis of the facts and circumstances prevailing at that point in time.
- To finalise the disclosure in consultation with the Managing Director and CFO, and in their absence, the Executive Director or Company Secretary; for this purpose, the relevant details of the event or information shall be sent to the Authorised Person(s) promptly, or as soon as practicable, to enable disclosure to the Stock Exchange(s).

- To make the required disclosures within the stipulated time of actual occurrence of an event or information, after ascertaining the facts.
- To disclose material developments on a regular basis, till such time the event or transaction is resolved/closed, with relevant explanations.
- To consider such other events or information that may require disclosure to the Stock Exchange(s) which are not explicitly defined in the Listing Regulations, and to determine the materiality, appropriate time, and contents of disclosure for such matters.
- To disclose material events or information with respect to the subsidiaries of the Company.

4. Deemed Material Events or Information

Events or information specified in Para A of Part A of Schedule III of the Listing Regulations are required to be disclosed irrespective of application of any quantitative or qualitative materiality thresholds, as these are “deemed” to be material. The applicable events (“deemed disclosures”) are set out in [Annexure 1](#).

5. Guidelines for Materiality Assessment

- The events or information specified in Para B of Part A of Schedule III of the Listing Regulations, which are disclosed based on application of materiality criteria, are set out in [Annexure 2](#).
- Materiality must be determined on a case-to-case basis, depending on the material facts and circumstances pertaining to the information or event, and shall be determined based on the qualitative judgement exercised by the Authorised Person(s).
- The following criteria shall apply for determination of materiality of an event or information:
 - the omission of an event or information which is likely to result in a discontinuity or alteration of an event already available publicly; or
 - the omission of an event or information which is likely to result in a significant market reaction if the said omission came to light at a later date; or
 - the omission of an event or information whose value, or expected impact in terms of value, exceeds the lower of the following:
 - a) two percent (2%) of the turnover, as per the last audited consolidated financial statement of the Company;
 - b) two percent (2%) of the net worth, as per the last audited consolidated financial statement of the Company, except where the arithmetic value of the net worth is negative; or
 - c) five percent (5%) of the average of the absolute value of profit and loss after tax, as per the last three audited consolidated financial statements of the Company.
- Where the above three criteria are not applicable, an event or information may be treated as material if, in the opinion of the Board of Directors, the event or information is considered material.
- Any event or information having a significant risk to the reputation of the Company.

- Where, in the opinion of the Board of Directors, the event/information ought to be disclosed though not statutorily required to be intimated.
- The quantitative criteria indicated in Annexure 2 shall apply only to events specified in Para B of Part A of Schedule III of the Listing Regulations, and shall be used as a yardstick/reference for determining materiality and arriving at the overall decision on the event to be reported by the Company Secretary.
- Only such impact which is direct, reasonably perceivable, not remote, quantifiable, and having a short-term horizon of 1–2 years shall be considered.
- Notwithstanding anything stated in Annexure 2, the Authorised Person(s) may apply qualitative criteria for deeming an event/information to be material or not, in cases where the aforesaid quantitative criteria cannot be reasonably ascertained or applied.

6. Disclosure

Any event or information falling under Regulation 30 of the Listing Regulations (as per Annexures 1 and 2) shall be informed to the Authorised Person(s) promptly upon occurrence, with adequate supporting data/information, to facilitate prompt and appropriate disclosure to the Stock Exchange(s). Guidance on when an event/information is deemed to have occurred, as indicated in Annexure II of SEBI's Circular dated September 9, 2015, is reproduced as Annexure 3.

The Company shall, inter alia:

- First disclose to the Stock Exchange(s) all events or information which are material in terms of this Regulation, as soon as reasonably possible, and in any case not later than:
 - (i) 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;
 - (ii) twelve hours from the occurrence of the event or information, where the event or information emanates from within the Company; or
 - (iii) twenty-four hours from the occurrence of the event or information, where the event or information does not emanate from within the Company;

provided that disclosure with respect to events for which timelines are specified in Part A of Schedule III shall be made within such timelines; and provided further that where disclosure is made after the specified timelines, the Company shall, along with such disclosure, provide an explanation for the delay.

- Make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.
- Provide specific and adequate replies to all queries raised by the Stock Exchange(s) with respect to any events or information; the Stock Exchange(s) shall disseminate the information and clarification as soon as reasonably practicable.
- On its own initiative, confirm or deny any reported event or information to the Stock Exchange(s).
- Where an event or information is required to be disclosed pursuant to receipt of a communication from any regulatory, statutory, enforcement, or judicial authority, disclose such communication along with the event or information, unless prohibited by such authority.

- Disclose all events or information with respect to subsidiaries which are material for the Company.
- Refer any other event or information, even if not covered under the Listing Regulations but potentially of a price-sensitive nature, to the Authorised Person(s) for evaluation.

The Authorised Person(s) will ascertain the materiality of events or information considering their nature and relevant impact in terms of discontinuity of market information and significant market reaction in case of omission. The respective departments shall assist the Authorised Person(s) in this assessment. After evaluation, the Authorised Person(s) shall issue a suitable disclosure to the Stock Exchange(s) in consultation with the Managing Director and CFO, and in their absence, the Executive Director or Company Secretary, pursuant to Regulation 30 of the Listing Regulations.

7. Policy Review

In case of any subsequent changes in the provisions of the Listing Regulations, or any other regulations, which render any clause or provision of this Policy inconsistent with the Listing Regulations, the provisions of the Listing Regulations shall prevail over this Policy, and the relevant clauses/provisions of this Policy shall be deemed to be modified accordingly. The Board also has the discretion to review and revise this Policy from time to time.

8. Disclosure on Website

As required under the Listing Regulations, this Policy will be disclosed on the website of the Company.

Further, the Company shall disclose on its website all events or information disclosed to the Stock Exchange(s) under the Listing Regulations, and such disclosure shall be hosted on the Company's website for a minimum period of 5 (five) years, and thereafter as per the Company's archival policy. Any change in the content of the website shall be updated within 2 (two) working days from the date of such change.

PART B

MATERIALITY FOR DISCLOSURES IN OFFER DOCUMENTS UNDER THE SEBI ICDR REGULATIONS, 2018

1. Introduction

This Part B of the Policy has been formulated to define the materiality thresholds applicable to SSSMehta Industries Limited (“Company”), pursuant to the disclosure requirements under Schedule VI of the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (“SEBI ICDR Regulations”), in respect of:

- a) Identification of material companies to be disclosed as **Group Companies** in the Offer Documents (as defined below);
- b) (i) Identification of ‘material’ outstanding litigation (in addition to all criminal proceedings, tax proceedings, and actions by statutory/regulatory authorities) involving the Company, its Promoters, its Directors, and its Subsidiaries (collectively, the “Relevant Parties”); (ii) identification of all outstanding criminal proceedings against Key Managerial Personnel and Senior Management of the Company and all actions taken by regulatory/statutory authorities against such Key Managerial Personnel and Senior Management; and (iii) identification of outstanding litigation involving the Group Companies which may have a material impact on the Company; and
- c) Identification of ‘material’ creditors and outstanding dues therein.

2. Definitions

- (i) **“Act”** means the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended from time to time.
- (ii) **“Company”** means SSSMehta Industries Limited.
- (iii) **“Board of Directors” or “Board”** means the Board of Directors of the Company, as constituted from time to time.
- (iv) **“Designated Stock Exchange”** means a recognised stock exchange having nationwide trading terminals chosen by the Company on which its securities are listed or proposed to be listed for the purpose of a particular issue of specified securities under the SEBI ICDR Regulations, being the NSE Emerge platform of the National Stock Exchange of India Limited; provided that the Company may choose a different recognised stock exchange as the designated stock exchange for any subsequent issue of specified securities.
- (v) **“Offer Document”** means a draft red herring prospectus, red herring prospectus, or prospectus, as applicable, referred to under the Companies Act, 2013, in case of a public issue, and includes any addendum or corrigendum thereto.
- (vi) **“Promoter”** shall include a person who: (i) has been named as such in a draft offer document or offer document, or is identified by the Company in the annual return referred to in Section 92 of the Companies Act, 2013; (ii) has control over the affairs of the Company, directly or indirectly, whether as a shareholder, director, or otherwise; or (iii) in accordance with whose advice, directions or instructions the Board is accustomed to act; provided that this shall not apply to a person acting merely in a professional capacity, or to a financial institution, scheduled

commercial bank, mutual fund, or similar institutional investor holding twenty percent (20%) or more of the equity share capital, unless such person otherwise satisfies the requirements prescribed under the SEBI ICDR Regulations.

- (vii) **“Promoter Group”** includes the Promoter, immediate relatives of the Promoter, and, as applicable, the bodies corporate, HUFs, and firms connected with the Promoter in the manner set out in Regulation 2(1)(pp) of the SEBI ICDR Regulations, subject to the carve-out for financial institutions, scheduled banks, mutual funds, and similar institutional investors set out therein.
- (viii) **“Key Managerial Personnel” or “KMP”** means the Key Managerial Personnel of the Company, including the Executive Chairman, Managing Director, Whole-Time Director, Chief Executive Officer, Manager, Chief Financial Officer, and Company Secretary, who may be authorised individually or collectively to determine materiality of events or information and to disclose the same to the Stock Exchange(s).
- (ix) **“Group Companies”**: As per Schedule VI of the SEBI ICDR Regulations, the Company is required to define a materiality policy for identification of “group companies” for disclosure in its draft prospectus/prospectus, being “such companies as covered under applicable accounting standards and also other companies as considered material by the board of the issuer.” For this purpose, the Company shall consider as its Group Companies those entities covered under the applicable accounting standard (Ind AS 24/AS-18, as applicable) as per its financial statements, and also other companies considered material by the Board pursuant to the SEBI ICDR Regulations. A company shall be treated as a Group Company where it fulfils both of the following conditions: (i) it forms part of the Promoter Group of the Company in terms of Regulation 2(1)(pp)(iv) of the SEBI ICDR Regulations; and (ii) the Company has entered into one or more transactions with such company in the preceding fiscal or audit period, as the case may be, exceeding ten percent (10%) of the Company’s total revenue as per its financial statements.
- (x) **“Material Creditors”**: The Company is required to disclose, pursuant to Para 12(A)(2) of Part A of Schedule VI of the SEBI ICDR Regulations, in the Draft Prospectus/Prospectus, details of outstanding dues to creditors, comprising (i) complete disclosure for material creditors based on the Board’s materiality policy; and (ii) consolidated information on outstanding dues to micro, small, and medium enterprises and other creditors, separately giving details of the number of cases and amount involved, together with complete details on the Company’s website with a web-link thereto in the Offer Documents. For this purpose, a creditor shall be considered material if the amount due to such creditor exceeds five percent (5%) of the Company’s trade payables as per its last audited financial statements.
- (xi) **“Material Litigation”**: The Company is required to disclose in its Offer Documents all outstanding (i) criminal proceedings; (ii) actions by statutory or regulatory authorities; (iii) taxation matters (direct and indirect); and (iv) other pending material litigation, involving the Company, its Directors, its Promoters, and its Group Companies. For the purpose of Para 12(A)(1) of Part A of Schedule VI of the SEBI ICDR Regulations and this Policy: (a) litigation shall be considered material where the value, or expected impact in terms of value, exceeds the lower of (I) two percent (2%) of turnover, (II) two percent (2%) of net worth (except where the arithmetic value of net worth is negative), or (III) five percent (5%) of the average of the absolute value of profit or loss after tax, in each case as per the latest/last three annual consolidated financial statements of the Company, as applicable; and (b) for litigation involving Directors, the Board shall consider all outstanding litigation involving each Director and treat

it as material where an adverse outcome would materially and adversely affect the reputation, operations, or financial position of the Company, and each Director shall identify and provide information relating to such litigation involving themselves.

3. Applicability

This Part B has been discussed and approved by the Board at its meeting held on 25.07.2026, and shall be effective from the date of such approval.

In this Part B, “Offer Documents” means the draft red herring prospectus, red herring prospectus, and prospectus, and any addendum or corrigendum thereto, to be filed by the Company in connection with its proposed initial public offering of equity shares with (i) SEBI, (ii) the Registrar of Companies, Jharkhand, and (iii) the Designated Stock Exchange, as applicable.

All other capitalised terms not specifically defined in this Part B shall have the meanings ascribed to such terms in the Offer Documents.

A. Identification of Material Companies to be Disclosed as Group Companies

Requirement

The SEBI ICDR Regulations define “group companies” as “such companies (other than promoter(s) and subsidiaries) with which there were related party transactions, during the period for which financial information is disclosed in the Offer Documents, as covered under the applicable accounting standards, and also other companies as considered material by the board of the issuer.” Accordingly, Group Companies shall include: (i) companies (other than the Promoter(s) and subsidiaries) with which there were related party transactions during the relevant period, as covered under Indian Accounting Standard (Ind AS) 24; and (ii) companies considered material by the Board.

Policy on Materiality

With respect to (ii) above, companies which are members of the Promoter Group and with which the Company has entered into transactions during the most recent completed financial year and/or the relevant stub period (as applicable) for which financial information is included in the Offer Documents, and which individually or in the aggregate, in value, exceed ten percent (10%) of the Company’s consolidated revenue from operations for the most recent completed financial year disclosed in the Offer Documents, shall be considered material and disclosed as a “group company” in the Offer Documents.

B. Identification of Material Litigation

Requirement

The Company shall disclose the following outstanding litigation involving the Relevant Parties:

- (i) all outstanding criminal proceedings (including matters at the FIR stage, even where no cognizance has been taken by any court);
- (ii) all outstanding actions (including penalties and show cause notices) by regulatory and statutory authorities;
- (iii) disciplinary action, including penalties imposed by SEBI or the stock exchanges, against the Promoters in the last five financial years preceding the relevant Offer Documents, including any outstanding action;

- (iv) claims relating to direct and indirect taxes, in a consolidated manner, giving the number of cases and total amount; and
- (v) other pending litigation based on the lower of the threshold criteria set out below: (A) as per the materiality policy defined by the Board and disclosed in the Offer Documents; or (B) litigation where the value, or expected impact in terms of value, exceeds the lower of (a) two percent (2%) of turnover, (b) two percent (2%) of net worth (except where negative), or (c) five percent (5%) of the average of the absolute value of profit or loss after tax, in each case as per the latest/last three annual consolidated financial statements of the Company, as applicable.

The Company shall further disclose (1) all criminal proceedings and (2) all actions taken by statutory and regulatory authorities, in each case involving its Key Managerial Personnel and Senior Management, and shall disclose outstanding litigation involving the Group Companies which has a material impact on the Company.

Policy on Materiality

Other than the litigation referred to in (i) to (iv) above, any other outstanding litigation involving the Relevant Parties shall be considered ‘material’ for disclosure in the Offer Documents if:

- a) the aggregate monetary claim made by or against the Relevant Parties in any such pending proceeding is equal to or exceeds the lower of (i) 2% of turnover, (ii) 2% of net worth (except where negative), or (iii) 5% of the average of the absolute value of profit or loss after tax, in each case per the latest/last three annual consolidated financial statements of the Company; or
- b) where the monetary liability is not quantifiable or does not exceed the threshold in (a) above, the outcome of the proceeding may have a material bearing on the business, operations, performance, prospects, financial position, or reputation of the Company; or
- c) the decision in one litigation is likely to affect the decision in similar litigation involving the Relevant Parties, even where the individual amount involved does not exceed 5% of the average of the absolute value of profit or loss after tax as per the last three consolidated financial statements.

The same criteria shall apply for determining outstanding litigation involving the Group Companies which may have a material impact on the Company.

Pre-litigation notices received by any Relevant Party or Group Company from third parties (excluding notices from statutory/regulatory/governmental/taxation authorities, or notices threatening criminal action) shall not be treated as litigation until the relevant party is impleaded before a judicial/arbitral forum, unless the Board decides otherwise. FIRs (whether or not cognizance has been taken) against the Relevant Parties, KMP, or Senior Management shall be disclosed in the Offer Documents.

This policy on materiality is without prejudice to any disclosure requirements prescribed under the Companies Act, 2013, or by SEBI or any other applicable authority with respect to litigation, notices, disputes, and other proceedings in the Offer Documents, and applies solely for the purpose of disclosure requirements under the SEBI ICDR Regulations and should not be applied for any other purpose.

C. Identification of Material Creditors and Outstanding Dues

Requirement

The Company shall make relevant disclosures in the Offer Documents for outstanding dues to creditors, comprising: (i) based on the Board’s materiality policy, details of material creditors, including the

consolidated number of creditors and aggregate amount involved; (ii) consolidated information on outstanding dues to micro, small, and medium enterprises (“MSME”) and other creditors, separately giving details of the number of cases and amount involved, based on information available with the Company as relied upon by the statutory auditors; and (iii) complete details of outstanding dues to material creditors, with name and amount, on the Company’s website with a web-link thereto in the Offer Documents.

Policy on Materiality

For identification of material creditors for disclosure under (i) above, a creditor of the Company shall be considered material if the amount due to such creditor is equal to or exceeds 5% of the Company’s consolidated trade payables as of the end of the most recent financial period covered in the consolidated financial statements included in the Offer Documents.

GENERAL

This Part B is solely for the purpose of disclosure requirements prescribed under the SEBI ICDR Regulations with respect to the Offer Documents, and should not be applied for any other purpose, including disclosure of material information by the Company pursuant to the Listing Regulations after listing of its equity shares (which is governed by Part A of this Policy).

This Part B is without prejudice to any disclosure requirements prescribed under the Companies Act, 2013, and the rules thereunder, or by SEBI or any other regulatory, judicial, quasi-judicial, governmental, administrative, or statutory authority with respect to the Company or its listing, or as may be prescribed by SEBI through its observations on the Offer Documents, or disclosures arising from investor or other complaints.

This Part B shall be subject to review and amendment as may be deemed necessary, and in accordance with regulatory amendments from time to time.

ANNEXURE 1

Events which shall be disclosed without application of the materiality guidelines specified in sub-regulation (4) of Regulation 30 of the Listing Regulations:

1. Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation, merger, demerger, or restructuring), sale or disposal of any unit(s), division(s), or whole or substantially the whole of the undertaking(s) or subsidiary of the Company, sale of stake in an associate company, or any other restructuring.

Explanation (1): For the purpose of this paragraph, 'acquisition' means

- (i) acquiring control, directly or indirectly; or
- (ii) acquiring, or agreeing to acquire, shares or voting rights in a company such that:
 - (a) the Company holds shares or voting rights aggregating to five percent (5%) or more;
 - (b) there is a change in holding from the last disclosure exceeding two percent (2%) of the total shareholding or voting rights; or
 - (c) the cost of acquisition or price exceeds the threshold specified under sub-clause (c) of clause (i) of sub-regulation (4) of Regulation 30.

Explanation (2): 'Sale or disposal of subsidiary' and 'sale of stake in associate company' include:

- (i) an agreement to sell or sale of shares/voting rights such that the company ceases to be a wholly owned subsidiary, subsidiary, or associate company; or
- (ii) an agreement to sell or sale of shares/voting rights where the sale amount exceeds the threshold specified under sub-clause (c) of clause (i) of sub-regulation (4) of Regulation 30.

Explanation (3): 'Undertaking' and 'substantially the whole of the undertaking' have the same meaning as under Section 180 of the Companies Act, 2013.

2. Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities, or alteration in the terms or structure of existing securities, including forfeiture, reissue of forfeited securities, alteration of calls, and redemption of securities.
3. New rating(s) or revision in rating(s).
4. Outcome of meetings of the Board of Directors: the Company shall disclose to the Stock Exchange(s), within 30 minutes of the closure of the meeting held to consider the following —
 - (a) dividends and/or cash bonuses recommended, declared, or a decision to pass any dividend, and the date of payment/dispatch;
 - (b) cancellation of dividend with reasons;
 - (c) decision on buyback of securities;
 - (d) decision on proposed fund raising;
 - (e) increase in capital by issue of bonus shares, including the credit/dispatch date;
 - (f) reissue of forfeited shares/securities, or issue of shares/securities held in reserve, or creation of new shares/securities or rights/privileges to subscribe;
 - (g) particulars of other alterations of capital, including calls;
 - (h) financial results; and
 - (i) decision on voluntary delisting; provided that where the board meeting is held over more than one day, financial results shall be disclosed within thirty minutes of the end of the day on which they were considered.
5. Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent impacting management and control of the Company), and

agreement(s)/treaty(ies)/contract(s) with media companies) which are binding and not in the normal course of business, and revisions, amendments, and terminations thereof, including agreements entered into by shareholders, promoters, promoter group entities, related parties, directors, KMP, or employees of the Company or its holding, subsidiary, or associate company, among themselves or with the Company or a third party, which impact management or control.

6. Fraud/defaults by the Promoter or Key Managerial Personnel, or by the Company, or arrest of Key Managerial Personnel or Promoter.
7. Change in Directors, Key Managerial Personnel (Managing Director, Chief Financial Officer, Company Secretary, etc.), Auditor, and Compliance Officer.
8. Appointment or discontinuation of the share transfer agent.
9. Corporate debt restructuring.
10. One-time settlement with a bank.
11. Reference to BIFR and winding-up petitions filed by any party/creditor.
12. Issuance of notices, call letters, resolutions, and circulars sent to shareholders, debenture holders, or creditors, or advertised in the media by the Company.
13. Proceedings of Annual and Extraordinary General Meetings of the Company.
14. Amendments to the Memorandum and Articles of Association of the Company, in brief.
15. Schedule of analyst or institutional investor meetings and presentations on financial results made to analysts or institutional investors.

ANNEXURE 2

Illustrative list of events which shall be disclosed upon application of the materiality guidelines:

1. Commencement, or postponement of the date of commencement, of commercial production or commercial operations of any unit/division.
2. Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-ups, adoption of new lines of business, or closure of operations of any unit/division (in entirety or piecemeal).
3. Capacity addition or product launch.
4. Awarding, bagging/receiving, amendment, or termination of awarded/bagged orders or contracts not in the normal course of business.
5. Agreements (viz. loan agreement(s) as a borrower, or other binding agreements not in the normal course of business) and revisions, amendments, or terminations thereof.
6. Disruption of operations of any unit or division due to natural calamity (earthquake, flood, fire, etc.), force majeure, or events such as strikes or lockouts.
7. Effect(s) arising from a change in the regulatory framework applicable to the Company.
8. Litigation(s)/dispute(s)/regulatory action(s) with impact.
9. Fraud/defaults, etc., by directors (other than Key Managerial Personnel) or employees of the Company.
10. Options to purchase securities, including any ESOP/ESPS scheme.
11. Giving of guarantees, indemnity, or becoming a surety for any third party.
12. Granting, withdrawal, surrender, cancellation, or suspension of key licenses or regulatory approvals.

ANNEXURE 3

Guidance on When an Event/Information Has Occurred

1. The Company may be confronted with the question of when an event/information can be said to have occurred.
2. In certain instances, the answer depends upon the stage of discussion, negotiation, or approval; in other instances, where no such discussion, negotiation, or approval is required (e.g., natural calamities or disruptions), the answer depends on when the Company became aware of the event/information.
 - a) In the former case, the event/information is said to have occurred upon receipt of approval of the Board of Directors (e.g., a further issue of capital by way of rights issue), and, for certain events/information, upon receipt of approval of both the Board and the Shareholders; provided that, considering price sensitivity, for certain events (e.g., a decision on declaration of dividends), disclosure shall be made on receipt of approval of the Board, pending Shareholders' approval.
 - b) In the latter case, the event/information is said to have occurred when the Company becomes aware of it, or as soon as an officer of the Company has, or ought to have, reasonably come into possession of the information in the course of performance of duties. The term 'officer' has the same meaning as under the Companies Act, 2013, and includes the promoter of the Company.