

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

1. INTRODUCTION

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter termed as “**SEBI LODR / LODR Regulations**”) as amended from time to time require a company to disclose material events or information to the Stock Exchanges.

Pursuant to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, issued on September 2, 2015, the Board of Directors of VA TECH WABAG LIMITED (“the Company”) approved the “**Policy for Determination of Materiality of Events or Information**” (hereinafter may be referred to as the/this “Policy” in this document). This Policy has been updated based on the amendments made to Regulation 30 and Schedule III of the LODR Regulations, by way of the SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2023 (“**LODR Amendments**”) and the SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123, dated July 13, 2023 (“**SEBI Circular**”).

SEBI vide its Circular No. SEBI/HO/CFD/CFD-PoD-2/P/CIR/2025/25 dated February 25, 2025, has issued the “Industry Standards Note (ISN) on Regulation 30 of the SEBI LODR Regulations, 2015”. The said Materiality Policy shall be read and complied with in line with the aforesaid SEBI Circular dated February 25, 2025, as amended from time to time.

The Board of Directors of the Company shall review, and if found required, may amend this Policy from time to time.

In this Policy, unless the context otherwise requires:

- (a) “Act” means the Companies Act, 2013 and the rules framed thereunder, as amended from time to time;
- (b) “Industry Standards Note” / “ISN” means “Industry Standards Note on Regulation 30 of LODR Regulations”, as amended from time to time.
- (c) “Key Managerial Personnel” means key managerial personnel as defined under sub-section (51) of section 2 of the Companies Act, 2013;
- (d) “Net Worth” shall have the meaning assigned to it in Section 2(57) of the Act;
- (e) “Policy” means this policy, as amended from time to time;
- (f) “SEBI” means the Securities and Exchange Board of India;
- (g) “Stock Exchange(s)” means BSE Limited and the National Stock Exchange of India Limited, where the equity shares of the Company are listed;
- (h) “Turnover” shall have the meaning assigned to it in Section 2(91) of the Act;

All other words and expressions used but not defined in this Policy, shall have the same meaning as assigned to it under the LODR Regulations, the Act, the SEBI Act, 1992 (“SEBI Act”) and the Securities Contracts (Regulation) Act, 1956 (“SCRA”).

2. TITLE

This Policy shall be called ‘**Policy for determination of materiality for disclosure of events or information.**’

3. EFFECTIVE DATE / APPLICABILITY

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

- (a) This policy is effective from February 06, 2016. This Policy has been amended for certain changes by the Board of Directors of the Company at their meeting held on February 08, 2019 effective from April 01, 2019.
- (b) This Policy has been further amended for changes by the Board of Directors of the Company in line with the SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2023 w.e.f. July 15, 2023 and this policy shall be effective from August 11, 2023.
- (c) This Policy has been further amended for changes as stipulated in the Industry Standards Note.
- (d) This policy shall be applicable to the Company and / or its subsidiaries as the case may be as prescribed in the LODR Regulations.

4. AUTHORITY FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION

The Key Managerial Personnel (KMPs) for the said Policy consisting of the Chairman & Managing Director, the Deputy Managing Director & Group Chief Executive Officer, the Chief Financial Officer, and the Company Secretary are hereby nominated to determine whether the event / information is material or not and in turn about its time line for disclosure based on the categories of information as specified above to the stock exchanges.

The Board authorizes the CFO or the Company Secretary (who are also the KMPs) jointly with any of the above KMPs to determine whether the event is material or not and in turn about its timeline for disclosure based on the categories of information as specified above to the stock exchanges. In the event of unavailability of the CFO or the Company Secretary, any two KMPs as mentioned above are jointly authorized to act on materiality determination and disclosure of events.

The details of the above referred KMPs and officers shall be also disclosed to the Stock Exchange(s) and as well as on the Company's website.

5. OBJECTIVES

The objective of this Policy is to assist the employees of the Company in identifying potential material events or information in an objective manner that may originate at the ground level which can be promptly escalated and reported to the authorized Key Managerial Personnel or other officers of the Company, as specified in this Policy, for determining the materiality of the said event or information and for making necessary disclosure to the BSE Limited and the National Stock Exchange of India Limited (collectively, the "Stock Exchanges"). All provisions of Regulation 30 read with Schedule III of the LODR Regulations shall hereby be deemed to be incorporated in this Policy, by reference.

6. MATERIALITY CRITERIA FOR DISCLOSURE OF EVENTS / INFORMATION

A) DEEMED TO BE MATERIAL EVENTS:

The Company shall disclose all such events which are specified in Para A of Part A of Schedule III of the LODR Regulations (as applicable from time to time) ("**Para A Events**") without any application of the guidelines for materiality as specified in Regulation 30(2) of the LODR Regulations. The details to be provided to the Stock Exchanges while disclosing Para A Events shall be in compliance with the requirements of the SEBI Circular.

B) EVENTS WHICH ARE DEPENDENT ON APPLICATION OF GUIDELINES FOR MATERIALITY:

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

The Company shall disclose all such material events or information pertaining to itself or to its subsidiary(ies), specified in Para B of Part A of Schedule III of the LODR Regulations ("**Para B Events**") subject to application of guidelines for materiality, as set out under the LODR Regulations.

Further, the Company, while disclosing material information which is disclosable under Regulation 30 of SEBI LODR with respect to such communication, *shall not be required to disclose, confidential and sensitive information, including proprietary information*. A summary of key elements of such communication (furnished in the prescribed format by the SEBI as set out in **Annexure C** attached to this Policy), shall constitute sufficient compliance by the Company, under Regulation 30(13) of the SEBI LODR.

GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION:

Non-Quantitative Guidelines:

Non-Quantitative criteria would mean:

- (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.

Quantitative Guidelines:

Quantitative criteria would be calculated based on audited consolidated financial statements and would mean 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 three audited consolidated financial statements of the Company.

In terms of the SEBI Circular, if the average of absolute value of profit or loss is required to be considered by disregarding the 'sign' (positive or negative) that denotes such value as the said value / figure is required only for determining the threshold for 'materiality' of the event and not for any commercial consideration.

For avoidance of doubt, it is clarified that if the objective materiality threshold is not met, an event or information may be treated as being material if in the opinion of the Board of the Company, the event or information is considered material.

Further, as per the ISN, in certain instances, all of the three parameters specified under Regulation 30(4)(i)(c) (viz., profit / net worth / turnover) may not be relevant to an event of the Company. As such, while assessing whether an event exceeds the materiality thresholds, the Company should refer to **Annexure A** attached to this Policy, for guidance on which of the relevant and appropriate parameter ought to be considered for determination of materiality for different types of events (applicable for the Company) under Para B of Part A of Schedule III.

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

The details to be provided to the Stock Exchanges while disclosing Para B Events shall be in compliance with the requirements of the SEBI Circular.

Notwithstanding anything contained hereinabove, the following may please be noted:

- The Company during its normal course of business provides a wide range of services towards *Engineering, Procurement and Construction (EPC) of water and waste water treatment Plants including associated infrastructure like pumping stations, pipelines etc, handling of sludge, production of green power, resource recovery and O&M of the aforementioned facilities*, to various categories of its Customers. Therefore, as a good corporate governance mechanism, during the normal course of business, if the Company gets any “Letter of Award” or “Contract” or “Order”, then the same will be intimated to the Stock Exchanges through a Press Release or a Stock Exchanges intimation within 24 hours as under:
 - If received from the overseas Parties (outside India): The value Should not be less than USD 10 Million
 - If received from the Indian Parties (within India): The value Should not be less than INR 100 Crore

Provided further that, to protect the confidentiality and competitive edge of the Company and Group, and in the best interest of the Company and the Group, while intimating to the Stock Exchanges by way of either Press Release or Stock Exchanges intimation, the exact value of “Letter of Award” or “Contract” or “Order” shall not be disclosed.

Instead the said “Letter of Award” or “Contract” or “Order”, shall be disclosed with the following descriptions, based on the value band that the “Letter of Award” or “Contract” or “Order” falls in:

Description of Order	Domestic (in INR)	International (in USD)
Small*	upto 100 Crores	Upto 10 Million
Medium	100 to 250 Crores	10 Million to 30 Million
Large	250 to 600 Crores	30 Million to 75 Million
Major	600 to 1000 Crores	75 Million to 150 Million
Mega	Above 1000 Crores	Above 150 Million

**No mandatory disclosure required as per the Policy, but may be disclosed for any reasons that the Board or the persons authorized under clause 4 of this Policy, deem fit.*

Normal course of business of the Company is as below:

- EPC of water and wastewater treatment plants including Desalination, Reuse and recycle of waste water, industrial effluent treatment, Sewage treatment, drinking water treatment;
- EPC of associated infrastructures like pumping station, pipelines etc;
- EPC of plants and associated infrastructure for production of green power from biogas, handling of sludge, resource recovery;

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

- Operation & maintenance (O&M) of the above mentioned facilities on an annual and multi-annual basis;
- All the above services being delivered to Municipal and Industrial Customers on Design, Build, operate (DBO), standalone O&M, standalone EPC/EP, Hybrid Annuity Model (HAM), Build-Operate-Transfer (BOT)/ Build-Own-Operate-Transfer (BOOT)/public private partnership (PPP) models;
- Any other business that is directly or indirectly regulated in any manner in future as per the Memorandum of Association of the Company.

7. GUIDELINES ON OCCURRENCE OF AN EVENT / INFORMATION & ITS TIMELY DISCLOSURE:

The occurrence of material events / information could be either emanating from within or outside the listed entity by the Company's own accord or for reasons not in the hands of the Company. It can be categorized as under:

- (a) depends upon the stage of discussion, negotiation or approval; and
- (b) in case of natural calamities disrupting operations etc., it would depend upon the timing when the Company became aware of the event/information.

In respect of the events under (a) above, the events/information can be said to have occurred upon receipt of approval of the Board of Directors, e.g. *further issue of capital by rights issuance* and in certain events/information after receipt of approval of both i.e. Board of Directors and Shareholders.

However, considering the price sensitivity involved, for certain events e.g. *decision on declaration of dividends etc.*, disclosure shall be made on receipt of approval of the event by the Board of Directors, pending Shareholder's approval. Approvals other than final approvals, such as in-principle approvals, exploratory approvals etc. will not require disclosure under this Policy.

In respect of the events under (b) above, the events/information can be said to have occurred when the Company becomes aware of the events/information, or as soon as, an officer of the entity has, or ought to have reasonably come into possession of the information in the course of the performance of his duties. The term 'officer' shall have the same meaning as defined under Section 2(59) of the Act (*i.e. "Officer" includes any director, manager or KMP or any person in accordance with whose directions or instructions the Board of Directors or any one or more of the directors is or are accustomed to act*) and shall also include Promoter of the Company.

Further, action taken or order passed by the sector regulator / enforcement authority of the Company would be required to be disclosed, if such action or order, where quantifiable, exceeds the threshold specified by the SEBI. The Company may refer to **Annexure B** attached to this Policy, for identifying its sector regulator / enforcement authority.

8. DISCLOSURE

All events/information identified as material in line with the LODR Regulations and under this Policy shall be disclosed as soon as reasonably possible and in any case not later than the following:

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

- (i) For all material events/ information for which decision is taken in a Board meeting within **30 (thirty) minutes** from the closure of the Board meeting;
- (ii) For all material events/ information emanating from within the Company within **12 (twelve) hours** from the occurrence of the event or information;
- (iii) For all material events/ information relating to the Company but emanating from outside the Company within **24 (twenty-four) hours** from the occurrence of the event or information.

- (a) In case the disclosure is made after the stipulated timeline, the Company shall provide an explanation for the delay along with the disclosure.*
- (b) 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.*

9. DISCLOSURES ON WEBSITE

- (a) This Policy shall be hosted on the website of the Company;
- (b) The Company shall update on its website all disclosures made under the LODR Regulations to the Stock Exchanges and shall continue to host on its website such disclosures for a minimum period of five years and thereafter archived as per the Archival Policy of the Company.

10. AMENDMENTS/ POLICY REVIEW

This policy is framed based on the provisions of LODR Regulations. In case of any conflict between the policy and the LODR Regulations / Companies Act, 2013 / Industry Standard Note or any other statutory enactments and rules thereof or any subsequent changes in the provisions/ regulations and which makes any of the provisions in the policy inconsistent with the Act or regulations, the provisions of LODR Regulations / Companies Act, 2013 / Industry Standards Note or statutory enactments and rules thereof shall prevail over this Policy and the provisions in the policy would be modified in due course to make it consistent with law.

The Board reserves the right to review and amend the policy from time to time as and when required. Any subsequent amendment / modification in the LODR Regulations, the Companies Act, 2013 / Industry Standard Note and / or other applicable laws / rules / regulations / circulars / notifications etc. in this regard shall automatically apply to this Policy.

Original Policy Adopted on February 06, 2016

Revision 1 - Revision w.e.f. April 01, 2019

Revision 2 - Revision w.e.f. August 11, 2023

Revision 3 - Revision w.e.f. May 21, 2024

Revision 4 - Revision w.e.f. March 28, 2025

Revision 5 - Revision w.e.f. November 07, 2025

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

Annexure A

Guidance on appropriate parameter (profit / net-worth / turnover) to be considered for determination of materiality for different types of events under Para B of Part A of Schedule III of LODR Regulations

As per regulation 30(4)(i)(c) of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 ('**LODR Regulations**'),

(i) The listed entity shall consider the following criteria for determination of materiality of events/ information:

(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.*

Thus, it is understood that any event/ information shall be considered as material for the Company if the value of such transaction or the expected impact of such event/ information in terms of value is lower of the turnover or net worth or profits after tax as calculated under the above stated provisions.

However, in certain instances, all of the three parameters specified under Regulation 30(4)(i)(c) (viz, profit / net worth / turnover) may not be relevant to an event. Applying the principle of *Reddendo Singula Singulis* to the materiality provisions of LODR Regulations, it can be said that since there are separate thresholds of 2% of turnover, 2% of net worth and 5% of average PAT, each of such values can be applied individually and a particular threshold would be relevant and applicable depending on the nature of the event/ information being assessed. For instance, any event which has an impact on the turnover or profits of the Company can be considered material by comparing the value of such event/ information with 2% of the consolidated turnover or 5% of the average PAT respectively.

Similarly, if there is any event/ information which has a capital cost involved, then the materiality of such event/ information can be identified by comparing the value of such event/ information with 2% of the consolidated net worth of the Company and if the value of event exceeds such threshold, then the event would be considered as material.

Based on the above, an analysis as to which of the three parameters should be applied for events or information stated in Schedule III, Part A, Para B is suggested below for uniform approach by the listed entities:

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

S. No.	Para B Events	Comparable with individual threshold limit (Numerator to Denominator)
1	Commencement or any postponement in the date of commencement of commercial Production or commercial operations of any unit/division.	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/ loss to 5% of average PAT
2	Any of the following events pertaining to the listed entity:	
	(a) arrangements for strategic, technical, manufacturing, or marketing tie-up; or	Lower of the below: a. Capital invested or to be invested for such tie-up to 2% of consolidated net worth; or b. Expected impact on turnover to 2% of consolidated turnover; or c. Expected impact on profit/ loss to 5% of average PAT
	(b) adoption of new line(s) of business; or	Lower of the below: a. Capital invested or to be invested for new line of business to 2% of consolidated net worth; or b. Expected impact on turnover to 2% of consolidated turnover; or c. Expected impact on profit/ loss to 5% of average PAT
	(c) closure of operations of any unit, division or subsidiary (in entirety or in piecemeal)	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/ loss to 5% of average PAT

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

3	Capacity addition or product launch.	Capacity addition: Lower of the below: a. Capital invested or to be invested to 2% of consolidated net worth; or b. Expected impact on turnover to 2% of consolidated turnover; or c. Expected impact on profit/ loss to 5% of average PAT Product launch: Lower of the below: a. Capital invested or to be invested for product launch to 2% of consolidated net worth; or b. Expected impact on turnover to 2% of consolidated turnover; or c. Expected impact on profit/ loss to 5% of average PAT
---	--------------------------------------	---

S. No.	Para B Events	Comparable with individual threshold limit (Numerator to Denominator)
4	Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business	Lower of the below: a. Expected capital expenditure to 2% of consolidated net worth; or b. Expected impact on turnover to 2% of consolidated turnover; or c. Expected impact on profit/ loss to 5% of average PAT
5	Agreements (viz. loan agreement(s) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof	Lower of the below, as may be applicable: a. Expected impact on balance sheet (increase in liability in terms of amount of loan) to 2% of consolidated net worth; or b. Expected impact on turnover to 2% of consolidated turnover; or c. Expected impact on profit/ loss to 5% of average PAT
6	Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts, etc.	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/ loss to 5% of average PAT

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

7	Effect(s) arising out of change in the regulatory framework applicable to the listed entity.	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/ loss to 5% of average PAT
8	Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the listed entity	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/ loss to 5% of average PAT
9	Frauds or defaults by employees of the listed entity which has or may have an impact on the listed entity	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/ loss to 5% of average PAT
10	Options to purchase securities including any ESOP/ESPS Scheme	Lower of the below: a. Expected increase in capital to 2% of consolidated net worth; or b. Expected impact on profit/ loss to 5% of average PAT

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

S. No.	Para B Events	Comparable with individual threshold limit (Numerator to Denominator)
11	Giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party	Lower of the below: a. Expected impact on balance sheet (increase in liability in terms of amount of guarantee, indemnity, surety, etc.) to 2% of consolidated net worth; or b. Expected impact on profit/ loss in case the guarantee / indemnity / surety is invoked to 5% of average PAT
12	Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.	Lower of the below: a. Expected impact on turnover to 2% of consolidated turnover; or b. Expected impact on profit/ loss to 5% of average PAT
13	Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority	Threshold to be linked with Para A(20) - imposition of penalty.

Notes:

1. The above comparison of numerator to denominator for each event shall be applied basis on the assessment available with the Company, whether internal or external including any press release, transaction documents, insurance, board presentation, management review, etc., for determining such expected impact on turnover, capital expenditure, profits, etc.
Refer Para 2.1 of the Note for explanation on computing “expected impact in terms of value”.
2. Consolidated turnover, net worth and profit/loss shall be as per the last audited consolidated financial statements of the listed entity and the average PAT shall be average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the listed entity.

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

Annexure B

Part I - List of sector regulators in India

S. No.	Industry/Sector	Regulator(s)
1.	Chemicals and petrochemicals	Ministry of Chemicals and Fertilizers
2.	Fertilizers and agrochemicals	Ministry of Chemicals and Fertilizers
3.	Cement and cement products	-
4.	Other construction materials	-
5.	Ferrous metals	-
6.	Non-ferrous metals	-
7.	Diversified metals	-
8.	Minerals and mining	Directorate General Of Mines Safety
9.	Metals and minerals trading	-
10.	Paper, forest and jute products	-
11.	Automobiles	-
12.	Auto components	-
13.	Consumer durables	-
14.	Textiles and apparels	-
15.	Media	Ministry of Information and Broadcasting
16.	Entertainment	Telecom Regulatory Authority of India, Department of Telecommunications
17.	Printing and publication	Ministry of Information and Broadcasting
18.	Realty	Real Estate Regulatory Authority
19.	Leisure services	-
20.	Other consumer services	-
21.	Retailing	-
22.	Gas	Petroleum and Natural Gas Regulatory Board
23.	Oil	Petroleum and Natural Gas Regulatory Board
24.	Petroleum products	Petroleum and Natural Gas Regulatory Board
25.	Consumable fuels	Petroleum and Natural Gas Regulatory Board
26.	Agricultural food and other products	-
27.	Beverages	-
28.	Cigarettes and tobacco products	-
29.	Personal products	-
30.	Household products	-
31.	Diversified FMCG	Food Safety and Standards Authority of India (FSSAI), Food and Drug Administration (FDA)
32.	Banks/ NBFCs	Reserve Bank of India, Banking Ombudsman, Securities and Exchange Board of India (to the extent it acts as a licensing authority vis-à-vis the listed entity), Insurance Regulatory and Development Authority of India (to the extent it acts as a licensing authority vis-à-vis the listed entity), Pension Fund

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

S. No.	Industry/Sector	Regulator(s)
		Regulatory and Development Authority (to the extent it acts as a licensing authority vis-à-vis the listed entity)
33.	Capital markets	Securities and Exchange Board of India, Stock Exchanges, Reserve Bank of India (to the extent it acts as a licensing authority vis-à-vis the listed entity), Insurance Regulatory and Development Authority of India (to the extent it acts as a licensing authority vis-à-vis the listed entity), Pension Fund Regulatory and Development Authority (to the extent it acts as a licensing authority vis-à-vis the listed entity).
34.	Insurance	Insurance Regulatory and Development Authority of India, Pension Fund Regulatory and Development Authority (to the extent it acts as a licensing authority vis-à-vis the listed entity)
35.	Financial technology (fintech)	Reserve Bank of India (to the extent it acts as a licensing authority vis-à-vis the listed entity), Securities and Exchange Board of India (to the extent it acts as a licensing authority vis-à-vis the listed entity), Insurance Regulatory and Development Authority of India (to the extent it acts as a licensing authority vis-à-vis the listed entity), Pension Fund Regulatory and Development Authority (to the extent it acts as a licensing authority vis-à-vis the listed entity)
36.	Pharmaceuticals and biotechnology	National Pharmaceutical Pricing Authority (NPPA)
37.	Healthcare equipment and supplies	Central Drugs Standard Control Organisation
38.	Healthcare services	National Medical Commission
39.	Construction	-
40.	Aerospace and defense	Directorate General of Civil Aviation (DGCA)
41.	Agricultural, commercial and construction vehicles	-
42.	Electrical equipment	-
43.	Industrial manufacturing	-
44.	Industrial products	-
45.	IT – software/ services/ hardware	-
46.	Engineering services	-
47.	Transport services	-
48.	Transport infrastructure	-
49.	Commercial services & supplies	-
50.	Public services	-
51.	Telecom – services	Telecom Regulatory Authority of India, Department of Telecommunications
52.	Telecom – equipment & accessories	Telecom Regulatory Authority of India, Department of Telecommunications
53.	Power	Central/State Electricity Regulatory Commissions

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

54.	Other utilities • Water supply & management • Waste management • Emergency services • Multi utilities • Other utilities	-
55.	Diversified	-

Part II – List of Enforcement Authorities

- Enforcement Directorate and Central Bureau of Investigation.

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

Annexure C

[On the letterhead of the listed entity]

Date: [●]

To

BSE Limited

Phiroze Jeejeebhoy Towers

Dalal Street

Mumbai 400 001

Maharashtra, India

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block G

Bandra Kurla Complex

Bandra (E), Mumbai 400 051

Maharashtra

Dear Sir / Madam,

Re: [●]

In respect of the captioned matter, I/ (we) the undersigned, state and declare that the information and details provided in **Form A**, in compliance with Regulation 30(13) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, is true, correct and complete to the best of my/ (our) knowledge and belief.

Thanking you,

Yours faithfully,

Name and Signature:

Date and Place:

Designation:

Email ID:

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

Form A

Disclosure by [Name of listed company] regarding receipt of communication from regulatory, statutory, enforcement or judicial authority under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

[Regulation 30(13) – Disclosure of communication from regulatory, statutory, enforcement or judicial authority]

Sr. No.	Particulars	Details
1.	Name of the listed company	
2.	Type of communication received	
3.	Date of receipt of communication	
4.	Authority from whom communication received	
5.	Brief summary of the material contents of the communication received, including reasons for receipt of the communication	
6.	Period for which communication would be applicable, if stated	
7.	Expected financial implications on the listed company, if any	
8.	Details of any aberrations/non-compliances identified by the authority in the communication	
9.	Details of any penalty or restriction or sanction imposed pursuant to the communication	
10.	Action(s) taken by listed company with respect to the communication	
11.	Any other relevant information	
