



SANGHVI MOVERS LIMITED

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



A. Preamble:

The Board of Directors of Sanghvi Movers Limited (the "Company") has adopted this policy (the, "Policy") for Determination of Materiality of Events or Information for Disclosure" (the 'Policy') for disclosure of material events or information to the stock exchanges, which is considered necessary from time to time, in accordance with, and to comply with the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations'). 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 Disclosure Circular**") and SEBI (Listing Obligations and Disclosure Requirements) (Third Amendment) Regulation, 2015.

This Policy shall be effective from 05th February 2016.

B. Type of Information:

This policy covers important information about the company's business, operations, or performance that can significantly influence investment decisions in securities. The material information shall be disclosed appropriately according to the prescribed guidelines. 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. 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.

C. 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:
 - 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 percent of turnover, as per the Last Audited Consolidated Financial Statements of the Company;
 - ii. Two percent of Net Worth, except in case of the arithmetic value of the net worth is negative, as per the Last Audited Consolidated Financial Statements of the Company;
 - iii. 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 Company.

Accordingly, any transactions exceeding the lower of i, ii or iii above will be considered for the above purposes.



D. Disclosure:

The Company shall disclose all events or information within the timelines specified in the Applicable Laws.

E. Competent Authority for determining the materiality of event/information or material development:

The Managing Director or CFO are the Competent Authority to decide materiality of an event /information or development for the purpose of making disclosure to the Stock Exchange.

F. Person responsible for disclosure

The Managing Director or CFO are authorised persons for the purpose of determining materiality of an event or information and to make appropriate disclosure on a timely basis. The Authorised Persons are empowered to seek appropriate counsel or guidance, as and when necessary, from other internal or external advisor/agency as may deem fit.

The contact details of the authorised person are as follows:

Contact number: +91 020-27400700/ 86696 74701/02/03/04

Email Id : cs@sanghvicranes.com

G. Hosting on Website:

All the above disclosures will be hosted on the website of the Company for a minimum period of five years.

H. Amendments:

The Board of Directors shall alter, amend or modify the clauses of this Policy from time to time in line with the requirement of the SEBI Regulations, Guidelines or any other rules, regulations etc., as applicable.

| Version | Particulars | Date | Approved by |
|---------|--------------------|------------|--------------------|
| 1.0 | New Policy adopted | 05.02.2016 | Board of Directors |
| 2.0 | Amendments | 25.05.2022 | Board of Directors |
| 3.0 | Amendments | 07.08.2023 | Board of Directors |
| 4.0 | Amendments | 13.02.2025 | Board of Directors |

