

BOROSIL LIMITED

POLICY ON DETERMINATION AND DISCLOSURE OF MATERIALITY OF EVENTS AND INFORMATION

1. SCOPE AND APPLICABILITY OF THE POLICY

This policy (“**Policy**”) of Borosil Limited (“**Company**”) has been adopted in accordance with Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI LODR**”), which requires every listed company to disclose material events or information to the Stock Exchanges.

2. OBJECTIVE OF THIS POLICY

In accordance with Regulation 30 of SEBI LODR, this Policy for determination of materiality of events or information has been formulated to provide guidelines to the management of the Company, to determine the materiality of events or information, and to ensure timely and adequate dissemination of information to the stock exchanges where the equity shares of the Company are listed.

3. MATERIAL EVENTS AND DISCLOSURE REQUIREMENTS

- Events specified in Para A of Part A of Schedule III of SEBI LODR are deemed to be material events and the Company shall make disclosure of such events or information to the stock exchange(s), without application of guidelines for materiality;
- Events specified in Para B of Part A of Schedule III of SEBI LODR shall be disclosed by the Company, if considered material after application of guidelines for determining materiality;
- Any other event/events considered Material by the “Authorized Personnel” shall be disclosed.

4. MATERIALITY THRESHOLDS

Quantitative criteria

Quantitative criteria would be calculated based on audited consolidated financial statements and would mean an event / information whose value involved or the expected impact in terms of value, exceeds the lower of the following:

- 2% of turnover, as per the last audited consolidated financial statement of the Company;
- 2% of net worth, as per the last audited consolidated financial statement of the Company, except in case the arithmetic value of the net worth is negative;
- 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.

Qualitative criteria

Qualitative criteria would mean:

- the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
- 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;
- any other event/information may be treated as being material if in the opinion of Authorised Personnel/ Board of Directors, the event / information is material.

BOROSIL LIMITED

5. TIMELINE FOR DISCLOSURE OF MATERIAL EVENTS OR INFORMATION

The Company shall first disclose to the Stock Exchanges all events or information which are material in terms of the provisions of SEBI LODR.

The Company shall disclose events / information within the timelines specified by the SEBI, from time to time, in accordance with SEBI LODR and/or applicable circulars.

The Company shall disclose all events or information with respect to subsidiary(ies) which are material for the Company, by applying the guidelines of materiality as provided in this Policy.

6. AUTHORISED PERSONNEL

In compliance with the provisions of Regulation 30 (5) of SEBI LODR:

- Mr. Shreevar Kheruka - Managing Director & CEO and Mr. Rajesh Kumar Chaudhary - Whole time Director, are severally authorized to determine materiality of an event or information in terms of this Policy.
- Mr. Shreevar Kheruka - Managing Director & CEO, Mr. Rajesh Kumar Chaudhary - Whole time Director, Mr. Anand Sultania – Chief Financial Officer and Mr. Suresh Savaliya – Company Secretary and Compliance Officer are *severally* authorized to make disclosures to Stock Exchanges of any material event or information.

Contact details of the Authorized Personnel

Name	Email ID	Contact no.
Mr. Shreevar Kheruka	shreevar.kheruka@borosil.com	022 – 6740 6300
Mr. Rajesh Kumar Chaudhary	rajeshc@borosil.com	022 – 6740 6300
Mr. Anand Sultania	anand.sultania@borosil.com	022 – 6740 6300
Mr. Suresh Savaliya	suresh.savaliya@borosil.com	022 – 6740 6300

7. MECHANISM TO IDENTIFY THE POTENTIAL MATERIAL EVENT AND REPORTING

- a) The Company Secretary in consultation with the Managing Director/ Whole Time Director/ Chief Financial Officer shall communicate the Policy and its requirements to such employees of the Company (including officers / employees of subsidiaries), whose roles are such that they could have first-hand knowledge of any event that would be a material event for the purpose of this Policy.
- b) The Company Secretary shall on annual basis communicate the Quantitative Materiality criteria to the aforesaid employees.

Employees who have the knowledge of potential event shall forthwith communicate the same to Mr. Shreevar Kheruka, Mr. Rajesh Kumar Chaudhary, Mr. Anand Sultania and Mr. Suresh Savaliya.

Mr. Suresh Savaliya/ Mr. Anand Sultania will take guidance as to materiality of the event/ information from Mr. Shreevar Kheruka or Mr. Rajesh Kumar Chaudhary.

BOROSIL LIMITED

8. REVIEW AND AMENDMENT OF POLICY

- The Policy shall be reviewed by the Board as and when any changes are to be incorporated in the Policy due to change in regulations or as may be felt appropriate by the Board. However, any change required in the policy due to change in the Authorised Persons of the Company, the Company Secretary is authorized to incorporate such change in consultation with Mr. Shreevar Kheruka, Managing Director and CEO of the Company.
- In case of any subsequent changes in the provisions of the SEBI LODR or any other regulations which makes any of the provisions in the Policy inconsistent with SEBI LODR or any other law, the provisions of the SEBI LODR or such other law, would prevail over the Policy. Any amendments made in SEBI LODR shall be effective and binding on the Company even if such amendments are not incorporated in the Policy.

This Policy was adopted by the Board of Directors in its meeting held on February 03, 2020 and modified in its meeting held on November 12, 2021, August 14, 2023 and February 07, 2025.