

## **POLICY FOR DETERMINATION OF MATERIALITY OF AN EVENT/INFORMATION**

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## **1. PREAMBLE**

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This Policy has been formulated in accordance with the provisions under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') as amended from time to time.

The objective of this Policy is to determine the materiality so that the events/information which satisfy the criteria of 'materiality' could be disclosed to the stock exchange(s) within the applicable timelines

## **2. OBJECTIVE**

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The Board of Directors of Ravindra Energy Limited ("the Company") at its Meeting held on August 06, 2025 have reviewed and adopted this Policy for Determination of Materiality of an Event/Information with the intention to serve as a guiding charter to the management to ensure that timely and adequate disclosure of events or information are made to the investor community by the Company in accordance with the provisions under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, to enable them to take well informed investment decisions with regard to the securities of the Company.

Further, the Policy is designed for systematic identification, categorization, review and disclosure to the stock exchanges and updation on the Company's website all such events/information which may have material bearing on the performance/operations of the Company and as a result, affect the market prices of the securities of the Company listed on the stock exchanges.

## **3. DEFINITIONS**

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In this Policy, unless otherwise expressly mentioned –

**"Material Event/Information"** means events/information determined based on application of the guidelines for materiality referred in sub-regulation (4) of Regulation 30 of the Listing Regulations.

**"Policy"** shall mean this Policy for Determination of Materiality of Events/Information as amended from time to time.



**“SEBI Listing Regulations”** shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

**“Senior Management”** shall mean officers/personnel of the listed entity who are members of its core management team excluding Board of Directors and shall comprise of all the members of management one level below the Chief Executive Officer/Managing Director/Whole-Time Director (including Chief Executive Officer, in case they are not part of the Board) and shall specifically include the functional heads, by whatever name called and the persons identified and designated as key managerial personnel, other than the board of directors, by the listed entity.

**“Schedule”** shall mean Schedule III to the SEBI Listing Regulations.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Securities Contracts (Regulations) Act, 1956, or the SEBI Listing Regulations, 2015 or any other law or regulation to the extent applicable to the Company.

#### **4. AUTHORITY**

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The Managing Director/Whole-Time Director, Chief Financial Officer and Company Secretary/Compliance Officer (“collectively referred to as Authorised Persons”) of the Company shall in accordance with the provisions under the SEBI Listing Regulations 2015 as amended from time to time, determine the materiality of an event or information and shall make necessary disclosures to the Stock Exchanges. The event / information may pertain to the Company and/or its Material Subsidiaries.

Additionally, the Authorised Persons shall confirm, deny or clarify upon Material Price Movement any reported event or information in the Mainstream Media with effect from such date as specified by SEBI from time to time, which is not general in nature and which indicates rumour of an impending specific event or information

The contact details of the Authorised Persons, shall be disclosed to the Stock Exchanges and also be provided on the website of the Company.

#### **5. DEEMED MATERIAL EVENTS/INFORMATION AND DISCLOSURE**

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Events or information as specified in Regulation 30(2) read with Para A of Part A of Schedule III to the SEBI Listing Regulations shall be deemed to be material events/information and would

be disclosed accordingly, irrespective of application of the materiality criteria.

The Company shall disclose all such events or information as specified in Para A of Part A of Schedule III of the Listing Regulations within the timelines as prescribed under the SEBI for compliance with the provisions of the Listing Regulations as may be amended from time to time.

## **6. CRITERIA FOR DETERMINATION OF MATERIALITY OF EVENT/INFORMATION AND DISCLOSURE**

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Materiality will be determined on a case-to-case basis depending on specific facts and circumstances relating to the event/information. In order to ascertain whether a particular event/information is material in nature, materiality criteria as under will be applied subject to the Quantitative factor mentioned below:

The omission of an event or information which is likely to:

- result in a discontinuity or alteration of an event already available publicly; or
- result in significant market reaction if the said omission came to light at a later date;

**In respect of events/information stated in Para B of Part A of Schedule III to the Listing Regulations (as listed in Annexure I), the following criteria shall be considered for determining whether the event / information is material:**

- (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, which is likely to result in significant market reaction, if the said omission came to light at a later date; or
- (c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following (“Materiality Threshold”):
  - i. two percent of turnover, as per the last audited consolidated financial statements of the Company; or
  - ii. two percent 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; or
  - 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.
- (d) In case where the criteria specified in sub-clauses (a), (b) and (c) above is not applicable, an event or information may be treated as being material if in the opinion of the Board



the event or information is considered material.

*Additionally, the Company would be considering the criteria for determination of material event/ information, as specified under the Industry Standards Note on Regulation 30 of the Listing Regulations pursuant to SEBI circular dated February 25, 2025, as amended from time to time.*

## **7. WEBSITE**

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The Company shall disclose on its website all such events or information which have been disclosed to the Stock Exchanges as stated above and such disclosures shall be hosted on the website of the Company in accordance with the provisions under Regulation 9 and Regulation 46 of the SEBI Listing Regulations 2015.

## **8. MONITORING AND EVALUATION OF THE POLICY**

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This Policy will be reviewed by the Board from time to time and if required, modify the same in order to comply with the statutory requirements and also to incorporate the best industry practices.

The Company shall also make disclosure of events/information as may be specified by the Securities and Exchange Board of India from to time.

If at any point a conflict of interpretation / information between the Policy and any regulations, rules, guidelines, notification, clarifications, circulars, master circulars/ directions issued by relevant authorities ("Regulatory Provisions") arises, then interpretation of the Regulatory Provisions shall prevail.

In case of any amendment(s) and/or clarification(s) to the Regulatory Provisions, the Policy shall stand amended accordingly from the effective date specified as per the Regulatory Provisions.

***Updated on August 06, 2025.***