Solanki Mechanic Works Limited

(Formerly known as Solanki Mechanic Private Works Limited)

Policy for Determination of

Materiality of Events or Information

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

BACKGROUND

With a view to enable investors to make well informed decisions, Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ***("Listing Regulation")*** requires every listed entity to make timely, adequate and accurate disclosure of any event or information which, in the opinion of its Board of Directors ***("Board")*** is material. Further, the sub-regulation 4 of listing regulation also provides for framing a policy for Determination of Materiality of events or information, based on the criteria specified therein.

Hence in view of the above, this Policy for Determination of Materiality of events or information ***("Policy")*** has been framed to provide necessary guidelines to the Board for determination of the materiality of events and information and to make timely, adequate and accurate disclosures of information or events which could affect the investment decisions of the investors

This Policy has been formulated in accordance with Clause (ii) of sub-regulation (4) of Regulation 30 of the Listing Regulations.

MATERIAL DISCLOSURES

The Company shall within the prescribed time disclose all such material events to the Stock Exchanges where **the Securities of the Company are listed as:**

a. Specified in Para A of Part A of Schedule III of the Listing Regulations without any application of guidelines for materiality as specified in sub regulation (4) of Regulation 30 of Listing Regulations;

b. Specified in Para B of Part A of Schedule III of the Listing Regulations subject to application of guidelines for materiality as specified in sub regulation (4) of Regulation 30 of Listing Regulations;

c. any other events/ information viz. any major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities; and

d. any other information as may be determined by the Board from time to time.

CRITERIA FOR DETERMINING MATERIALITY:

I. Events or information which are deemed to be Material Events.

Events specified in Annexure A are deemed to be Material Events as per sub regulation (2) of the regulation 30 of the SEBI Listing Regulations and the Company shall make disclosure of such events or information relating to such events to the Stock Exchange as per the provisions of the SEBI Listing Regulations.

II. Events or information which are dependent on application of guidelines for materiality.

The Company shall make disclosure of events as specified in Annexure B based on application of guidelines for determining Materiality as per following criteria.

Events / information shall be considered as Material if it meets any of the following criteria:

(a) Quantitative Threshold: the omission of an event or information, whose value or 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, as per the last audited consolidated financial statements of the Company, except where the arithmetic value of the net worth is negative; or (iii) five percent of the average of the absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company;

(b) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information that was previously made publicly available by the Company;

(c) 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

(d) In case where the criteria specified are not applicable, an event/information may be treated as being Material if in the opinion of the Board of Directors of the Company such event / information is considered Material.

III. Any other information or event which is to be disclosed by the Company

Events of the Company to which neither Para A nor B of Schedule III apply, should be disclosed if such events are considered Material by the Company. For the purpose of assessing whether a particular transaction or the amounts involved in that transaction are Material the following information will also be considered, although the list is not exhaustive:

- In case where the criteria specified in sub-clauses (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the listed entity, the event or information is considered material;
- Whether a related party is involved in the transaction;
- Whether the transaction is in the ordinary course of business.

GUIDELINES FOR DETERMINING WHEN THE MATERIAL EVENT/ INFORMATION HAS OCCURRED

The determination of the time when material event/information can be said to have occurred would depend either upon the stage of negotiation/discussion or approval and the events where no such negotiation/ discussion or approval is required, the event/information can be said to have occurred as and when the management become aware of the same.

AUTHORISED KEY MANAGERIAL PERSONNEL (KMP) FOR DETERMINING THE MATERIALITY

The following KMP’s are hereby jointly and/or severally authorised by the Board of Directors for determining materiality of an event or information for the purpose of making disclosures to the Stock Exchanges:

Name	Designation	Email Id & Contact Details
Solanki Naman Manojbhai	Managing Director	+91 63579 05793
Solanki Jaisal Nipulbhai	Whole Time Director	+91 63579 05794
Sejal Haresh Chaudhary	Company Secretary and Compliance Officer	compliance@solankimechanicworks.com +91 63579 05919

DISCLOSURES

a. The Managing Director, Executive Director and Company Secretary of the Company are authorized for ascertaining the materiality of events/ information considering its nature and to disclose it to the Stock Exchanges after taking into consideration various provisions of Listing Regulation and this Policy.

b. The Company shall use the electronic facilities provided by the Stock Exchanges for dissemination of the said event/ information.

c. Statutory timeframes for disclosure shall be adhered to delay, if any, should be sufficiently explained along with the disclosure.

AMENDMENT

Any change in the Policy shall be approved by the Board of the Company. The Board shall have the right to withdraw and/ or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

In case any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed thereunder and Listing Regulations ("Statutory Provisions"), the provisions of Statutory Provisions shall prevail.

DISSEMINATION OF THE POLICY

The policy shall be hosted on the website of the Company i.e. www.solankimechanicworks.com

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Effective Date: July 22nd, 2026

Date of Approval by Board of Directors: July 22nd, 2026