

Last Amended : 12<sup>th</sup> August, 2025

## **POLICY ON DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION FOR DISCLOSURE (S)**

### **1. Legal Framework**

This Policy (hereinafter referred to as “**Policy**”) shall be called “Policy on determination of Materiality of events or information for disclosure to Stock Exchanges” of Modulex Construction Technologies Limited (“**Modulex**”/ “**Company**”).

This policy has been formulated in accordance with the current guidelines laid down by Securities Exchange Board of India under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**LODR Regulation**”), with respect to disclosure of material events and information.

Pursuant to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, issued on 2<sup>nd</sup> September, 2015, the Board of Directors approved the “Policy for Determination of Materiality of Events or Information”. 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 13<sup>th</sup> July, 2023 (“**SEBI Disclosure Circular**”).

In terms of Regulation 30(4)(ii) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**LODR Regulations**”), every company which has listed its ‘Specified Securities’ is required to frame a policy for determining the materiality based on criteria specified in Regulation 30(4), duly approved by its Board which is to be disclosed on the website of the Company.

### **2. Objectives of the 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**

- (i) Events specified in Para A of Part A of Schedule III to the SEBI LODR shall be considered material and be disclosed irrespective of application of materiality thresholds;
- (ii) Events specified in Para B of Part A of Schedule III to the SEBI LODR shall be disclosed subject to meeting materiality thresholds;
- (iii) 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:

- (i) 2% of turnover, as per the last audited consolidated financial statement of the Company;
- (ii) 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;
- (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.

#### **Qualitative criteria**

Qualitative criteria would mean:

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

#### **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 Securities and Exchange Board of India 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. Authorized Personnel**

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

Mr. Suchit Punnose, – Executive Chairman, Mr. Ajay Palekar – Managing Director, Mr. Mahendra Kumar Bhurat – Chief Financial Officer are severally authorized to determine materiality of an event or information in terms of this Policy.

Mr. Suchit Punnose, – Executive Chairman, Mr. Ajay Palekar – Managing Director, Mr. Mahendra Kumar Bhurat – Chief Financial Officer and Ms. Bhoomi Mewada – Company Secretary and Compliance Officer are severally authorized to make disclosures to Stock Exchange of any material event or information.

Contact details of the Authorized Personnel:

<b>Name</b>	<b>Email ID</b>
Mr. Suchit Punnose	<a href="mailto:suchit@modulex.in">suchit@modulex.in</a>
Mr. Ajay Palekar	<a href="mailto:ajaypalekar@modulex.in">ajaypalekar@modulex.in</a>
Mr. Mahendra Kumar Bhurat	<a href="mailto:mahendrabhurat@modulex.in">mahendrabhurat@modulex.in</a>
Ms. Bhoomi Mewada	<a href="mailto:bhoomimewada@modulex.in">bhoomimewada@modulex.in</a>

## 7. Mechanism to identify the potential material event and reporting

The Company Secretary in consultation with the Chairman/ 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.

The Company Secretary shall on annual basis communicate the Quantitative Materiality criteria to the aforesaid employees.

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Mr. Mahendra Kumar Bhurat will take guidance as to materiality of the event/ information from Mr. Suchit Punnose and Mr. Ajay Palekar.

## 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 Authorized Personnel of the Company, the Company Secretary is authorized to incorporate such change in consultation with Mr. Suchit Punnose, Executive Chairman 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.

Original Policy approved by the Board in their meeting and effective from 14<sup>th</sup> February, 2019.

<b>Document Name</b>	Policy on Determination of Materiality of Events / Information for Disclosure (S)
<b>Effective date</b>	14 <sup>th</sup> February, 2019
<b>Approving Authority</b>	Board of Directors
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