

**POLICY FOR DETERMINATION OF
MATERIALITY OF EVENTS AND INFORMATION**

1. SCOPE

In compliance with Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended read with various circulars issued by the Securities and Exchange Board of India from time to time (the “Listing Regulations”), this policy for Determination of Materiality of Events And Information (the “Policy”) provides a framework for determining materiality of events and information for the purpose of making disclosure to the Stock Exchange. This policy aims to ensure timely and adequate disclosure of all material and price sensitive information to the Stock Exchange.

2. MATERIAL EVENTS AND INFORMATION

The events and information to be disclosed to the Stock Exchange under Regulation 30 of Listing Regulations are broadly divided into the following categories: -

- (a) Events and information specified in Para A of Part A of Schedule III of the Listing Regulations (“Para A”) including any amendment thereto, required to be mandatorily disclosed to the Stock Exchange.
- (b) Events or information specified in Para B of Part A of Schedule III of the Listing Regulations (“Para B”) including any amendment thereto, required to be disclosed to the Stock Exchange if they are material. Materiality of the events shall be decided by applying the Test of Materiality explained in clause 3 of the Policy.
- (c) Any other information or event viz. major development that is likely to affect the 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 other information exclusively known to the Company which may be necessary to enable the securities holders of the Company to appraise its position and to avoid establishment of a false market in such securities.
- (d) Without prejudice to the generality of paragraphs (a), (b) and (c) above, any other event or information as may be specified by the Board of Directors from time to time.

3. CRITERIA FOR DETERMINING MATERIALITY OF EVENTS AND INFORMATION

The Company shall consider the following criteria for determining materiality of events and information mentioned at clause 2(b) above (the “Test of Materiality of Events and Information”):-

- (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 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: -
- 2% (two percent) of turnover, as per the last audited consolidated financial statements of the Company;
 - 2% (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;
 - 5% (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) Events or information, where the criteria specified in (a), (b) and (c) above are not applicable, shall be considered material for the purpose of disclosure to the stock exchange if in the opinion of the Board of Directors of the Company, the event or information is considered material.

4. GUIDANCE ON OCCURRENCE OF AN EVENT OR INFORMATION

- (a) The occurrence of an event or information shall differ on a case to case basis and would depend on the stage of discussion, negotiation or approval. For example, events like Bonus issue can be said to have occurred on approval of the Board of Directors. Events like declaration of dividend would be deemed to have occurred when the dividend is approved by the Board of Directors and the shareholders. However, considering the price sensitivity involved in events like declaration of dividends, etc., disclosure shall be made on receipt of approval of the Board of Directors, pending Shareholders' approval.

In case in-principle approval or approval to explore (which is not final approval) is given by the Board of Directors, the same shall not require disclosure under regulation 30 of the Listing Regulations.

- (b) For events and information like natural calamities or disruptions, etc. which do not involve any discussion or approval, the date of occurrence would be the date when the Company becomes aware of such events or information or as soon as the officer of the Company has or ought to have reasonably come into possession of such information in the course of performance of his duties.

The term 'officer' includes any Director, Manager or Key Managerial Personnel or any person in accordance with whose directions or instructions the Board of Directors or any one or more Directors is or are accustomed to act and shall also include the promoters of the Company.

5. AUTHORITY

Chairman, Chief Financial Officer and/or Company Secretary shall be severally authorized to decide on the materiality of events and information for the purpose of making disclosure to the Stock Exchange. They shall also decide upon the requirement to respond to any queries raised or requests made by the Stock Exchange in respect of matters covered under Regulation 30 of the Listing Regulations.

The Functional Heads or Senior Management employees of the Company shall identify any potential material event or information requiring disclosure to the Stock Exchange and shall report the same, with adequate supporting data/ information, to authorised persons mentioned above for determining the materiality of events or information.

6. DISSEMINATION OF INFORMATION

The Chairman, Chief Financial Officer and the Company Secretary are severally authorized for timely disclosure of information under Regulation 30 of the Listing Regulations.

7. DISCLOSURES OF MATERIAL EVENTS AND INFORMATION

(a) The Company shall disclose all events or information in terms of the Regulation 30 to the stock exchange as soon as reasonably possible and not later than the following: -

- (i) 30 minutes of the closure of the Board meeting in which the decision pertaining to the event or information has been taken;
 - In case the Board meeting closes after normal trading hours of that day but more than 3 hours before the beginning of the normal trading hours of the next trading day, the listed entity shall disclose the decision pertaining to the event or information, within 3 hours from the closure of the board meeting.
 - In case the Board meeting is being held for more than 1 day, the financial results shall be disclosed within 30 minutes or 3 hours, as per timelines mentioned above, from closure of such meeting for the day on which it has been considered.
- (ii) 12 hours from the occurrence of event or information, in case the event or information is emanating from within the Company;
- (iii) 24 hours from the occurrence of event or information, in case the event or information is not emanating from within the Company.
 - If all the relevant information, in respect of claims which are made against the Company under any litigation or dispute, other than tax litigation or dispute, in terms of sub-paragraph 8 of paragraph B of Part A of Schedule III, is maintained in the structured digital database of the listed entity in terms of provisions of the

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the disclosure with respect to such claims shall be made to the stock exchange within 72 hours of receipt of the notice by the Company.

- (b) Disclosures for events or information for which timelines have been specified in Part A of Schedule III of Listing Regulations shall be made within such timelines;
- (c) In case the disclosure is made after the timelines mentioned in the Listing Regulations, the Company shall provide the explanation for the delay along with the disclosure.
- (d) The Company shall disclose all further material developments with respect to the disclosures referred to in this Policy on a regular basis, till the event is resolved/closed, with relevant explanations.
- (e) The Company shall also disclose all events and information with respect to its subsidiaries which are material for the Company.
- (f) The Company may on its initiative also confirm or deny any reported event or information to stock exchange.
- (g) Events and information which have been disclosed to the Stock Exchange under this Policy shall be placed on the website of the Company and shall be hosted on the website for a minimum period of five years. On expiry of the period of five years, such disclosures shall be dealt with in accordance with the Archival Policy of the Company.

8. DISCLOSURE ON WEBSITE

This Policy shall be disclosed on the Company's website www.perfectpac.com.

9. REVIEW / AMENDMENT

The Board may amend, abrogate, modify or revise any or all clauses of this Policy in accordance with the applicable provisions of the Listing Regulations and amendment(s) thereto notified by the Securities and Exchange Board of India and/or the Stock Exchange, from time to time. In case any provisions of this Policy are contrary to or inconsistent with the provisions of the Act, rules framed thereunder and Listing Regulations ("Statutory Provisions"), the Statutory Provisions shall prevail.

However, amendments in the Listing Regulations shall be binding even if not incorporated in this Policy.

This Policy was originally approved by the Board of Directors at its meeting held on November 09, 2015 and revised by the Board of Directors at its meeting held on July 28, 2023 and February 03, 2025. This revised Policy shall be effective from February 03, 2025.