



## **SAVY INFRA AND LOGISTICS LIMITED**

**POLICY ON DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION**

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**DISCLOSURE ON MATERIAL EVENTS / INFORMATION**

## **1. Introduction**

As per Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), a listed entity is required to frame a policy for determination of materiality of events or information which are required to be disclosed to the Stock Exchanges.

## **2. Purpose**

The purpose of this Policy is to determine materiality of events and information and to ensure that the Listed entity shall make disclosure of events / transaction/ information specified in para A and B of Part A of Schedule III of the Listing Regulations to the Stock Exchanges.

## **3. Authority**

This Policy has been altered by the Board of Directors of **SAVY INFRA AND LOGISTICS LIMITED** (“the Company”) at its Meeting held on 10<sup>th</sup> May, 2025. The Policy shall also be displayed on the website of the Company.

## **4. Criteria for determination of materiality of event or information under the Listing Regulations**

The Listing Regulations lay down the following criteria for determining the materiality of event or 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;
- (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;
- (c) any event/information, which in the opinion of the Board of Directors of listed entity, is material.

## **5. Guidelines for determination of materiality of event or transaction or information**

The Company shall report all the media releases including material orders bagged, mergers and acquisitions and hive-offs to the Stock Exchange(s). Further, the following materiality criteria shall be adopted with respect to transactions for reporting to the Stock Exchange(s):

- (a) Orders/contracts valued at ₹ 50 crores each, bagged by the Company;
- (b) Transaction exceeding 15% of the turnover or 20% of the net-worth of the Company;

The Company shall disclose to the stock exchange(s) all material events or information as soon as reasonably possible and not later than twenty-four hours from the occurrence of event or information, in accordance with the provisions of Regulation 30 of the Listing Regulations.

**6. Guidelines for determination of pending litigation/arbitration proceedings as materiality of event or information**

All pending litigation/arbitration proceedings, including any litigation involving the Relevant Parties, other than criminal proceedings, actions by regulatory authorities and statutory authorities, disciplinary action including penalty imposed by SEBI or stock exchange against the promoters in the last five financial years including any outstanding action, and tax matters (direct or indirect) and also all criminal proceedings involving key managerial personnel and senior management of the issuer and also the actions by regulatory authorities and statutory authorities against such key managerial personnel and senior management of the issuer shall be considered 'material' which shall be based on lower of threshold criteria mentioned below:

(i) As per the policy of materiality defined by the board of directors of the issuer and disclosed in the offer document; or

(ii) Litigation where the value or expected impact in terms of value, exceeds the lower of the following:

(a) two percent of turnover, as per the latest annual restated consolidated financial statements of the issuer; or

(b) two percent of net worth, as per the latest annual restated consolidated financial statements of the issuer, except in case the arithmetic value of the net worth is negative; or

(c) five percent of the average of absolute value of profit or loss after tax, as per the last three annual restated consolidated financial statements of the issuer.”

The Company will publicly release all information disclosed to the Stock Exchanges under this Policy, by placing it on its website for a minimum period of five years and thereafter as per the Archival Policy of the Company, as disclosed on website.

**7. Authorization for determination of materiality of event or transaction or information**

The board of directors of the Company have authorized the following key managerial personnel for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) under the Listing Regulation and the contact details of such personnel are as under:

Name: Sneha Shah

Designation: CS & Compliance Officer

Email ID – compliance@savyinfra.com

## **8. Review & Amendment**

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant legislation and remains effective. The board has the right to change/amend the policy as may be expedient taking into account the law for the time being in force.