

Dhaval Packaging Limited

POLICY ON DETERMINATION OF MATERIALITY OF EVENTS/ INFORMATION

(Materiality Policy) Under Regulation 30(4) (ii) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015



POLICY ON DETERMINATION OF MATERIALITY OF EVENTS/ INFORMATION

1. PREAMBLE

Regulation 30(4) (ii) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”), mandates every listed shall frame a policy for determination of materiality of events/ information, duly approved by its Board of Directors. This policy is required to be disclosed on the website of the company.

The Board of Directors of Dhaval Packaging Limited (“the Company”) has adopted the following policy and the Board may amend this policy from time to time.

2. DEFINITIONS

- a) **“Board of Directors” or “the Board”** means the Board of Directors of Dhaval Packaging Limited, as constituted from time to time.
- b) **“Policy”** means policy for reporting and determination of Material Events.
- c) **“Material Events”** means events specified in Schedule III to SEBI Listing Regulations, upon the occurrence of which a listed entity shall make disclosures to the stock exchange(s) and post such disclosures on the website of the listed entity.

3. PROCEDURE TO DETERMINE MATERIALITY OF EVENTS OF INFORMATION

Materiality shall be determined on a case-to-case basis depending on specific facts and circumstances relating to the information/event in accordance with criteria as given below:

A. An event/ information as specified in Para-A of Part A of the Schedule III of the SEBI Listing Regulations

All events/ information as specified in Para-A of Part A of the Schedule III of the SEBI Listing Regulations, as amended from time to time shall be deemed to be material events/ information and shall be disclosed to the stock exchange and posted on the website of the Company. These events/ information shall not be subject to application of guidelines for materiality.

B. An event/information as specified in Para B of Part A Schedule III of the SEBI Listing Regulations

Guidelines for Materiality

All event/information as specified in Para-B of Part A Schedule III of the SEBI Listing Regulations, as amended from time to time shall be subject to the guidelines for materiality.

Guidelines for Materiality

The Board shall consider the following qualitative criteria as specified in regulation 30(4)(i) of the SEBI Listing Regulations for determining whether a particular event/ information as specified in Para B of Part A Schedule III of the SEBI Listing Regulations, as amended from time to time, is material in nature.

Where the omission of an event or information:

- (a) Is likely to result in discontinuity or alteration of event or information already available or
- (b) Is likely to result in a significant market reaction, if the said omission came to light at a later date.
- (c) Whose value or the expected impact in terms of value, exceeds the lower of the following;



- (1) two percent of turnover, as per the last audited consolidated financial statements of the listed entity;
- (2) two percent of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;
- (3) 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 listed entity

Where it would be difficult to determine materiality of any event / information, based on qualitative criteria as stated in points (a), (b) and (c) above, the same may be considered material for disclosure, upon meeting quantitative thresholds as specified in the Annexure A as amended by the Board from time to time.

C. An event/ information not specified in (A) & (B) above

Any other information/event not specified in (A) & (B) having major impact on business, operations, performance, financial condition, prospects, reputation, results of operations or cash flows of the Company or any adverse impact on the Company shall be disclosed to the stock exchanges:

4. AUTHORITY FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION

The key managerial personnel (KMPs) of the Company consisting of the managing director & chief executive officer/ whole-time director(s), chief financial officer and company secretary are hereby jointly and severally authorized to determine the materiality of an event or information and make disclosures to stock exchange(s), subject to such information being placed prior to or at the next Board Meeting held after the said information being made public. All disclosures shall be available on the website of the Company for a period of 5 years.

5. MODIFICATION OF THE POLICY

This Policy is framed based on the provisions of the SEBI Listing Regulations as notified on September 2, 2015. In case of any subsequent amendments to the SEBI Listing Regulations which makes any of the provisions in the Policy inconsistent, the provisions of the SEBI Listing Regulations shall prevail. The Policy shall be reviewed by the Audit Committee and on recommendations shall be modified by the Board so as to align the same with the amendments or to incorporate the changes as may be felt appropriate by the Audit Committee.

The list of events in Annexure A, as it stands today may be updated, from time to time, by company secretary & compliance officer, to reflect any changes to the SEBI Listing Regulations and the updated version be issued and published as necessary, without any requirement for approval from the Board.

6. EFFECTIVE DATE

The policy will be effective from October 18, 2025.



ANNEXURE A

Events which shall be disclosed upon application of the guidelines for materiality referred sub regulation (4) of regulation (30) of the SEBI Listing Regulations:

Event/information	Threshold limit
1 Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.	Exceeding 10% or more of the consolidated net worth of the company
2 Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division (entirely or piecemeal).	Exceeding 10% or more of the consolidated net worth of the company
3 Capacity addition or product launch.	Exceeding 10% or more of the consolidated net worth of the company
4 Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.	Exceeding 10% or more of the consolidated Turnover of the company
5 Agreements (viz. loan agreement(s) (as a borrower) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.	Value of the contract exceeds 10% of the consolidated turnover of the company
6 Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.	Total net worth of the unit exceeds 10% of the consolidated net worth of the company
7 Effect(s) arising out of change in the regulatory framework applicable to the listed entity	All changes having significant impact of the business on the business of the company as decided by the Board from time to time
8 Litigation(s) / dispute(s) / regulatory action(s) with impact.	Value of the contract exceeds 10% of the consolidated turnover of the company
9 Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.	Value exceeds Rs. 10 million or more
10 Options to purchase securities including any ESOP/ESPS Scheme.	2% of post issue equity share capital of the company
11 Giving of guarantees or indemnity or becoming a surety for any third party.	Value of the Guarantee exceeds 10% of the consolidated turnover of the company
12 Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.	All

