

BHAGYA MACHINE TOOLS LIMITED

(Formerly Known as Bhagya Steels Limited)

Regd. Office: - VPO Paddi, Hadbast No. 254, Near Radhe Sham Pataka Factory,
Sub Tehsil Dehlon, Ludhiana, Punjab-141206, India.

CIN U27320PB2021PLC054838

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION AND DISCLOSURE TO STOCK EXCHANGES

Approved by Board of Directors at its meeting held on June 17, 2026

SEBI has notified SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) on September 2, 2015 and amended on time to time. As per Regulation 30 of the Listing Regulations, every listed entity is required to frame a policy for determination of materiality of events or information duly approved by its Board of Directors, which would be disclosed on its website.

GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION

- a. Events or information specified in Para A of Part A of Schedule III of the Listing Regulations shall be deemed to be material. These events shall be disclosed without applying the test of materiality.
- b. In respect of events or information specified in Para B of Part A of schedule III of the Listing Regulations, the following criteria shall be applied for determination of materiality:-

(i) **Qualitative Criteria:** An event or information which meets any of the following criteria shall be considered material:

- (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;
- (c) In case where the criteria specified in sub-clauses (a) and (b) are not applicable, an event/information may be treated as being material if in the opinion of the board of directors of the Company, the event / information is considered material.

(ii) **Quantitative Criteria:** An event or information shall be considered material on the basis of criteria mentioned below:

S.No	Particulars	Criteria for determining materiality and intimation to Stock Exchanges
1	Commencement or any postponement in the date of commencement of commercial.	Delay by 2 Years from the targeted date as informed to the

	production or commercial operations of any unit/division.	stock exchanges. The target date informed to the Stock Exchanges should be set in a realistic manner.
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 (entirety or piecemeal).	
	2.1 Arrangements for strategic, technical, manufacturing, or marketing tie-up	If the arrangement changes the turnover of the Company by more than 30%.
	2.2 Adoption of new line(s) of business	If the new line of business changes the turnover of the Company by more than 30%.
	2.3 Closure of operations of any unit/division - (entirety or piecemeal)	If the closure of operations of a unit/division decreases the turnover of the Company by more than 30%.
3	Capacity addition or product launch.	
	3.1 Capacity addition	30% or more addition to the existing capacity of a unit or addition of a Greenfield unit/location.
	3.2 Product launch	If the new product adds to existing turnover of the Company by more than 30%.
4	Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.	
	4.1 Awarding of order(s)/contract(s)	Value above Rs. 5 Cr per purchase order/contract, which are not in normal course of business.
	4.2 Bagging/Receiving of orders/contracts	Value above Rs. 5 Cr per sale order/contract, which are not in normal course of business.
	4.3 Amendment or termination of orders/contracts	a) Amendment worth Rs. 5 Cr per order /contract, which are not in normal course of business. b) Termination of orders / contracts which are not in normal course of business for values defined in 4.1 and 4.2 above.
5	Agreements (viz. loan agreement(s) (as a	Binding agreements not in

	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.	normal course of business for value in excess of Rs. 50 Cr.
6	Disruption of operations of any one or more units or division of the Company due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.	
	6.1 At the time of occurrence	Where the disruption continues for 90 days or more.
	6.2 Regularly, till complete normalcy is restored.	At a frequency of 120 days or till normalcy is restored whichever is earlier
7	Effect(s) arising out of change in the regulatory framework applicable to the Company.	Annual Profit impact equivalent of 15% of that of the immediately preceding year or Rs. 15 Cr whichever is higher.
8	Litigation(s) / dispute(s) / regulatory action(s) with impact.	
	8.1 At the time of becoming the party	15% of Turnover or 20% of Net worth, whichever is higher.
	8.2 Regularly till the litigation is concluded or dispute is resolved .	At an interval of six months.
9	Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.	
	9.1 At the time of unearthing of fraud or occurrence of the default/arrest	Fraud/default: Rs 1 Cr or more
	9.2 Subsequently intimate the stock exchange(s) further details regarding the fraud/default.	At a frequency of 90 days.
10	Options to purchase securities (including any Share Based Employee Benefit (SBEB) Scheme) at the time of instituting the scheme after necessary approvals.	Launch of any scheme after necessary approvals
11	Giving of guarantees or indemnity or becoming a surety for any third party.	For a value in excess of 10% of net worth.
12	Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.	Impact exceeding 30% of turnover.

13	Any other information/event viz. 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 other information which is exclusively known to the listed entity which may be necessary to enable the holders of securities of the listed entity to appraise its position to avoid the establishment and of of a false market in such securities.	Impact exceeding 20% of turnover.
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Modification in the Policy:

The Board of Directors may at its sole discretion modify this Policy at any time as it may deem fit in view of various factors including the changes in applicable laws and regulations and change in turnover significantly.

**For and on behalf of the Board
Bhagya Machine Tools Limited**

**Jagdev Singh
(Managing Director)
DIN- 09428375**