

KAJARIA CERAMICS LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS/INFORMATION

1. PREFACE

In compliance with Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including amendments thereto from time to time ('Listing Regulations'), this Policy for Determination of Materiality of Events/Information (the 'Policy') provides a framework for determining materiality of events/information for the purpose of making disclosure to the Stock Exchanges.

This Policy aims to ensure timely and adequate disclosure of the material and price sensitive information to the BSE Limited and the National Stock Exchange of India Limited ('Stock Exchanges'). Accordingly, Kajaria Ceramics Limited ('Company') has adopted this Policy pursuant to the provisions of the Listing Regulations as amended from time to time.

2. MATERIAL EVENTS / INFORMATION

The material events/information to be disclosed to the Stock Exchanges are broadly divided into the following categories:

- (a) Events/Information specified in Para A of Part A of Schedule III of the Listing Regulations, which will be deemed to be material events;
- (b) Events/information specified in Para B of Part A of Schedule III of the Listing Regulations, based on the criteria mentioned in Clause 3 of this Policy for determining the materiality;
- (c) Events/information specified in Para C of Part A of Schedule III of the Listing Regulations; and
- (d) Without prejudice to the generality of paragraphs (a), (b) and (c) above, any other event/information as may be specified by the Board of Directors ('Board') of the Company or as may be required under the Listing Regulations / applicable laws, from time to time.

3. CRITERIA FOR DETERMINING THE MATERIALITY OF EVENTS / INFORMATION

The Company shall consider the following criteria for determining materiality of events/information mentioned at Clause 2(b) above:

- (a) the omission of an event/information, which is likely to result in discontinuity or alteration of event/information already available publicly; or
- (b) the omission of an event/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/information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - 2% of turnover, as per the last audited consolidated financial statements of the Company;

- 2% 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% 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) In case where the criteria specified in Clauses 3(a), 3(b) and 3(c) above are not applicable, an event/information may be treated as being material, if in the opinion of the Board of the Company, the event or information is considered as material.

4. DISCLOSURE OF MATERIAL EVENTS/INFORMATION

I. Disclosure of all events/information which are material will be made to the stock exchange(s) as soon as reasonably possible and in any case not later than the following:

(a) 30 minutes from the closure of the Board meeting of the Company in which the decision pertaining to the events/information has been taken;

However, if the Board meeting:

- closes after normal trading hours of that day but more than three hours before the beginning of the normal trading hours of the next trading day, the Company shall disclose the decision pertaining to the event or information, within three hours from the closure of the Board meeting;
- is being held for more than one day, the financial results shall be disclosed within 30 minutes or three hours, as applicable, from closure of such meeting for the day on which it has been considered.

'Normal trading hours' shall mean time period for which the recognized Stock Exchanges are open for trading for all investors.

(b) 12 hours from the occurrence of the event/information, in case the event or information is emanating from within the Company;

(c) 24 hours from the occurrence of the event/information, in case the event or information is not emanating from within the Company.

II. Disclosure with respect to all events/information for which timelines have been specified in Part A of Schedule III or the Listing Regulations, shall be made within such timelines.

III. The Company shall, with respect to all the disclosures mentioned above, make disclosures updating material developments on regular basis, till such time the event is resolved/closed, with relevant explanations.

IV. The Company shall also disclose all events/information with respect to its subsidiary(ies) which are material for Company.

V. The Company shall provide specific and adequate reply to all the queries raised by the Stock Exchanges with respect to any events/information.

VI. The relevant employee(s) of the Company upon identifying any material events or information shall immediately report the same to the authorized Official(s) as

mentioned under Clause 5 of this Policy, for determining the materiality of the said events or information and for making the necessary disclosures, wherever required, to the stock exchanges within the timeline prescribed under the Listing Regulations.

‘Relevant Employee’ means ‘Senior Management’ including Key Managerial Personnel of the Company or any employee as may be identified by the Board of Directors of the Company, from time to time.

- VII. The Company will also disclose any other event/information, which has not been indicated in Para A and Para B of Part A of Schedule III of the Listing Regulations and the same is available with the Company, which may have material effect on it.
- VIII. Events/information which have been disclosed to the Stock Exchanges under this Policy shall be placed on the Company’s website and same will be hosted on the Company’s 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 Company’s Archival Policy.
- IX. The Promoter, Directors, Key Managerial Personnel or Senior Management of the Company shall provide adequate, accurate and timely response to query(ies), if any, raised or explanation, if any, sought by the Stock Exchanges from the Company in order to ensure compliance with the Listing Regulations and other applicable laws.
- X. In case an event or information is required to be disclosed by the Company as per the Listing Regulations with respect to receipt of a communication from any regulatory, statutory, enforcement or judicial authority, then the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.
- XI. The Company shall also follow the Industry Standards Note on Regulation 30 of the Listing Regulations, for making disclosure of events or information under Regulation 30 of the Listing Regulations.
- XII. The Company may on its initiative also, confirm or deny any reported event or information to the Stock Exchanges and also make all applicable disclosures as per the provisions of the Listing Regulations and other applicable laws.

5. AUTHORITY

An Operating Committee, comprising of the Chairman, Vice Chairman, Managing Director, Chief Financial Officer and Company Secretary of the Company, will have the following authority:

- To determine any event/information deemed to be material;
- To decide an appropriate time of disclosure to the Stock Exchanges; and
- To decide the details to be disclosed to the Stock Exchanges in the best interest of investors and compliance of applicable laws.
- To do all acts, things as may be required with respect to disclosure under the Listing Regulations and other applicable laws.

6. DISCLOSURE

The disclosure of this Policy shall be made in accordance with the Listing Regulations / other applicable laws.

7. REVIEW/AMENDMENT

The Board of the Company, may review, amend, abrogate, modify or revise any or all provisions of this Policy, from time to time. However, amendment(s) in the Listing Regulations/other applicable laws shall be binding even if not incorporated in this Policy.

This Policy has been revised by the Board of the Company at its meeting(s) held on October 20, 2023 and January 30, 2026.