GUJARAT VICTORY FORGINGS LIMITED

POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF INFORMATION/EVENTS

[ADOPTED BY BOARD ON 12TH MARCH, 2026]

DESCRIPTION OF DOCUMENT: *This document provides a brief description of the Policy for Determination of Materiality for Disclosure of Information/Events at Gujarat Victory Forgings Limited*.

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POLICY FOR DETERMINATION OF MATERIALITY FOR DISCLOSURE OF INFORMATION/EVENTS

The following is the Policy for Determination of Materiality for Disclosure (**"Policy"**) of Information/Events adopted by Gujarat Victory Forgings Limited (hereinafter referred to as the "**Company**") in accordance with the provisions of Regulation 30 read with Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**"Listing Regulations"**) and SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123, dated July 13, 2023 (**"SEBI Disclosure Circular").**

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1. INTRODUCTION

The Policy provides an overall framework for disclosure of information or events of the Company and guidelines for determining the materiality thresholds pursuant to Regulation 30 and Regulation 30A of the Listing Regulations. This Policy is subject to the Board's review and changes, as may be appropriate, in conformity with the requirements of the Listing Regulations, as amended from time to time.

2. OBJECTIVE

The objective of this Policy is to facilitate timely, transparent and adequate disclosure of material information or events which are unpublished and price sensitive, have a bearing on performance or operations of the Company, may result in a significant market reaction in the price of securities of the Company if the omission comes to light at a later date or could affect investment decisions.

This policy is based on the principles governing the disclosures as stated in the Listing Regulations and the circular(s) & guideline(s) issued by the Securities Exchange Board of India ("**SEBI**") in this regard.

3. DEFINITIONS

3.1. **"Act"** means the Companies Act, 2013 and the rules framed thereunder, as amended from time to time.

3.2. **"Authorized Persons"** shall mean the persons authorized for the purpose of determining materiality of an event or information as defined in clause 6 of this Policy.

3.3. **"Board" or "Board of Directors"** means the Board of the Directors of the Company as constituted from time to time.

3.4. **"Committee"** means any Committee of the Board of Directors of the Company, constituted/reconstituted from time to time.

3.5. **"Company"** shall mean Gujarat Victory Forgings Limited.

3.6. **"Key Managerial Personnel"** or **"KMP"** means the personnel as defined under Section 2(51) of the Act.

3.7. **"Net Worth"** shall have the meaning assigned to it in Section 2(57) of the Act**.**

3.8. **"Officer"** shall have the same meaning as under the Act.

3.9. **"Ordinary course of business"** or **"normal course of business"** means all activities that are necessary, normal or incidental to the business of the Company and are permitted by objects of the Company. These would also include common practices, historical practices and customs of commercial transactions with a pattern of frequency.

3.10. **"Policy" means** this Policy for Determination of Materiality for Disclosure of Information/Events to the Stock Exchanges.

3.11. **"SEBI"** means the Securities and Exchange Board of India.

3.12. **"SEBI Master Circular"** means circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023, issued by SEBI for compliance with the provisions of the Listing Regulations, by listed

entities, as amended, or substituted from time to time.

3.13. **"SEBI Circular"** means circular no. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023, issued by SEBI for Disclosure of material events / information by listed entities under Regulations 30 and 30A of the Listing Regulations.

3.14. **"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956, as amended from time to time.

3.15. **"Stock Exchange(s)"** means stock exchanges on which the Securities of the Company are listed.

3.16. **"Subsidiaries"** means a subsidiary company as defined under Section 2(87) of the Act.

3.17. **"Turnover"** shall have the meaning assigned to it in Section 2(91) of the Act.

All other words and expressions used but not defined in this Policy, shall have the same meaning as assigned to it under the Companies Act, 2013, the Listing Regulations, the Act, the SEBI Act, 1992 ("**SEBI Act**") and the Securities Contracts (Regulation) Act, 1956 ("**SCRA**").

4. EVENTS OR INFORMATION WHICH ARE DEEMED TO BE MATERIAL EVENTS

The Company shall disclose all such events pertaining to itself and/or its material subsidiary(ies), which are specified in Para A of Part A of Schedule III of the Listing Regulations (as applicable from time to time) (**"Para A Events"**). Notwithstanding anything contained in this Policy, the Company shall at all times be required to disclose all such events as are specified under sub-regulation (2) of Regulation 30 of the Listing Regulations. Details to be provided to the Stock Exchanges while disclosing Para A Events shall be in compliance with the requirements of the SEBI Disclosure Circular.

5. EVENTS OR INFORMATION WHICH ARE DEPENDENT ON APPLICATION OF GUIDELINES FOR MATERIALITY

5.1. Any information or event, whether positive or negative, should be regarded as "material" if it meets the qualitative and/ or quantitative criteria for materiality set out in this Policy, or is deemed to be material under the applicable laws. Materiality will be determined on a case-to-case basis depending on specific facts and circumstances relating to the information/event, and applicable laws.

5.2. The Company shall disclose all such material events or information pertaining to itself or to its subsidiary(ies), specified in Para B of Part A of Schedule III of the Listing Regulations ("**Para B Events**") subject to application of guidelines for materiality, as set out under the Listings Regulations.

5.3. Events/information listed in Para B – Part A of Schedule III of the Listing Regulations, shall be considered material if it satisfies the materiality criteria stated below:

I. Quantitative Criteria would be calculated based on audited consolidated financial statements and would mean the omission of an event/ information whose value involved or the expected impact in terms of value, exceeds the lower of the following:

a) 2% (two per cent) of turnover, as per the last audited consolidated financial statements of the Company; or

b) 2% (two per cent) of the net worth as per the last audited consolidated financial statements of

c) the Company (except in case the arithmetic value of the net worth is negative)); or

d) 5% (five percent) of average of absolute value of profit or loss after tax, as per the last 3 (three) audited consolidated financial statements of the Company.

5.4. The details to be provided to the Stock Exchanges while disclosing Para B Events shall be in compliance with the requirements of the SEBI Disclosure Circular.

II. Qualitative Criteria would mean an event/ 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) any other event/information may be treated as being material if in the opinion of the Board of directors of Company, the event / information is considered material.

6. AUTHORIZATION TO KEY MANAGERIAL PERSONNEL (KMP) FOR THE PURPOSE OF DETERMINING MATERIALITY OF AN EVENT OR INFORMATION AND FOR THE PURPOSE OF MAKING DISCLOSURES TO STOCK EXCHANGES

6.1. The following KMP's of the Company are hereby authorized for the purpose of determining materiality of an event or information, evaluating whether an event/ information requires Stock Exchange disclosures, and for the purpose of making disclosures to the Stock Exchanges within the applicable timelines ("**Authorized Persons**"):

(i) Whole-time Director
(ii) Chief Financial Officer
(iii) Company Secretary and Compliance Officer

6.2. The materiality of events/ information outlined above are indicative in nature. There may be a likelihood of some unforeseen events emerging due to the prevailing business scenario from time to time. Hence, the relevant Authorized Person(s) should exercise his/her own independent judgement while assessing the materiality of events associated with the Company.

6.3. The Authorized Persons may also consult any other Director of the Company while assessing the materiality of an event or information, and for evaluating whether the event/ information requires a Stock Exchange Disclosure.

6.4. The Key Managerial Personnel and Senior Management Personnel and such other persons, as determined by the aforesaid authorized persons shall be relevant employees for the purpose of this Policy, to identify potential event or information pertaining to their functional roles and report the same to the aforesaid Authorized Persons.

6.5. Details of the above referred KMPs and officers shall be also disclosed to the Stock Exchange(s) and as well as on the Company's website.

6.6. The Authorized Person(s) shall also formulate operational guidelines for deployment of this Policy.

6.7. Authorized Person(s) shall make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.

7. DISCLOSURE

7.1. The Company shall disclose all events or information within the timelines specified in the Listing Regulations.

7.2. The Company shall also disclose all events or information with respect to its Subsidiaries as is required under applicable laws and the Listing Regulations.

7.3. In case the disclosure is made after the stipulated timeline, the Company shall provide an explanation for the delay along with the disclosure.

7.4. 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.

7.5. The Company shall disclose the communication, along with the event or information, in case an event or information is required to be disclosed by the Company in terms of the provisions of the Listing Regulations, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, unless disclosure of such communication is prohibited by such authority.

7.6. Any other Event, even if not covered under the Listing Regulations but is potentially of price sensitive nature or non-disclosure of which would result in discontinuity or alteration of publicly available information or is likely to result in a significant market reaction if disclosed at a later date, must also be informed, for further evaluation to the Authorised Person.

7.7. The Authorised Person will be responsible for ascertaining whether an event is to be reported on the basis of nature of information, applicability of deeming provisions, relevant impact in terms of discontinuity of market information and materiality. The secretarial, finance and compliance teams shall assist the Authorised Person in such assessment.

8. SCOPE AND LIMITATION

In the event of any conflict between the provisions of this Policy and the Listing Regulations, as amended from time to time, the Listing Regulations shall prevail over this Policy and the part(s) so repugnant shall be deemed to be severed from the Policy and the rest of the Policy shall remain in force.

9. REVIEW AND AMENDMENTS

This Policy shall be hosted on the website of the Company for such minimum period as mandated by the provisions of Listing Regulations.

The Board (including its duly constituted Committees) may, from time to time, make amendments to this Policy to the extent required due to changes in applicable laws and Listing Regulations or as deemed fit on a review. Any subsequent amendment/modification in the Act or the rules framed thereunder or the Listing Regulations and/or any other laws in this regard shall automatically apply to this Policy. The modifications, if any, made to the policy shall be disclosed on the website of the Company.

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(This Policy is approved and adopted by the Board of Directors of the Company in its meeting held on 12th March, 2026)

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For and on behalf of Board
Gujarat Victory Forgings Limited
(Formerly Known as Gujarat Victory Forgings Private Limited)



Rahul Vijendra Agrawal
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DIN: 02523976