POLICY ON DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION AND ITS DISCLSOURE TO THE STOCK EXCHANGES

Under Regulation 9 and 30(8) Pursuant to SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015

1. OBJECTIVE

Securities and Exchange Board of India ("SEBI"), has issued SEBI(Listing Obligation and Disclosure Requirements) Regulation, 2015 (the " Regulation") in terms of Regulation 30 read with the Board of Directors(the "Board") of the Advance Technoforge Limited (the " Company") has adopted this policy for determining Materiality of Disclosures (the " Policy") at its meeting held on 11th August, 2016 for determination of materiality of events or information ("Material Information") to enable the company to promptly disclose such information or event to the stock exchanges, pursuant to this Regulation.

This policy sets out the guidelines for identification of events or information within the Company which are deemed to be material in the opinion of the Board of Directors.

2. AUTHORISED PERSON

Regulation 30(5) of SEBI Listing Regulation provides that the Board of Directors of the Listed entity shall authorize one or more 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 this regulation and the contact details of such personnel shall be also disclosed to the stock exchange(s) and as well as on the listed entity's website.

Therefore, the Board of Directors have authorised the Key Managerial Personnel of the company:

SR. NO.	NAME	DESIGNATION	CONTACT DETAILS
1.	NILESH SHAMBHU BHAI MOLIYA	Managing Director	ADVANCE TECHNOFORGE LIMITED Survey No.121, At & Po: Padvala, Veraval-Shapar Industrial Area, Rajkot, Gujarat – 360024. Tel No. +91 96388 77000 Email: info@advancetechforge.com
2.	BIPIN M. SANGANI	Chief financial Officer	ADVANCE TECHNOFORGE LIMITED Survey No.121, At & Po: Padvala, Veraval-Shapar Industrial Area, Rajkot, Gujarat – 360024. Tel No. +91 97277 32322 Email: account@advancetechforge.com
3.	PAYAL BANSAL	Company Secretary & Compliance Officer	ADVANCE TECHNOFORGE LIMITED Survey No.121, At & Po: Padvala, Veraval-Shapar Industrial Area, Rajkot, Gujarat – 360024. Tel No. +91 97277 35355 Email: cs@advancetechforge.com

The Materiality of the event or information will be decided in consultation with business heads, plants heads, project heads and senior management personnel or persons connected with the events or information.

POWER AND RESPONSIBILITIES OF THE AUTHORISED PERSON FOR DETERMINING MATERIAL EVENT OR INFORMATION WITHIN THE COMPANY:

- To review and assess the materiality of an event that may qualify as 'material' and may require disclosure, on the basis of facts and circumstances prevailing at that point in time.
- The disclosures shall be finalised in consultation with the Managing Director and CEO and in his absence, Chief Executive Officer. For the purpose of the relevant details of event or information shall be sent to authorised persons promptly or as soon as practicable to enable its disclosure to the stock exchanges.
- To make required disclosures within the stipulated time of actual occurrence of an event or information, after ascertaining facts.
- To disclose material developments on a regular basis, till such time the event or transactions is resolved/closed, within relevant explanations.
- To consider such other events or information that may require disclosure to be made to the stock exchange which are not explicitly defined in the SEBI Regulations and determine the materiality, appropriate time and contents of disclosure for such matters.
- To disclose material events or information with respect to the subsidiaries of the company.

3. DEEMED MATERIAL EVENTS OR INFORMATION

Events or information specified in Part A of schedule III of the Regulation Confidential (2) are required to be disclosed irrespective of application of any quantitative or qualitative materiality thresholds as these are "deemed" to be material. The applicable events (also referred to as "deemed disclosures" are given in Annexure-1.

4. GUIDELINES FOR MATERIALITY ASSESSMENT

- The events or information specified in Para B of Part A of schedule III of the Regulations, which will be disclosed based on application of materiality criteria, are given in Annexure-2.
- Materiality must be determined on a case to case basis depending on the material facts and the circumstances pertaining to the information or event and would be determined based on the qualitative judgement to be exercised by the authorised persons.
- The following criteria will be applicable for determination of materiality of event or information, omission of event or information which is likely to:

- Result in a discontinuity or alteration of an event already available publicly; or
- Result in significant market reaction if the said omission came to light at a later date;

- Any event or information having a significant risk to the reputation of the company.
- In the opinion of the Board of Directors of the Company, the event/ information ought to be disclosed through not required to be statutorily intimated.
- The quantitative criteria as indicated in Annexure-2, shall apply to events specified in Para B of Part A of Schedule III of the Regulations only and shall be used as a yardstick or reference for determining materiality and arriving at the overall decision on the event to be reported by the company secretary.
- Only such impact which is direct, reasonably perceivable and not remote, quantifiable and having a short tern horizon of 1-2 years, shall be considered.
- Notwithstanding anything stated in Annexure-2, the authorised persons may apply qualitative criteria for deeming an event/information to be material or not in case where aforementioned quantitative criteria cannot be ascertained/ applied reasonably.

5. Disclosure

Any event or information falling under Regulation 30 of SEBI Regulation (as per Annexure 1 and 2) shall be informed to the authorised person(s) promptly upon occurrence, with adequate supporting data information, to facilitate a prompt and appropriate disclosures to the stock exchange. The guidance on when an event/ information has occurred as indicated in Annexure-II of SEBI's Circular dated September 9, 2015, is reproduced as Annexure-3. Any other event, eve if not covered under the SEBI Regulation but is potentially of price sensitive nature, must also be informed for further evaluation, to the authorised persons.

The Authorised Person will ascertain the materiality of events or information considering their nature and relevant impact in terms of discontinuity of market information and significant market reaction in case of omission. The respective departments shall assist the Authorised Person shall issue a suitable disclosure to the Stock Exchanges in consultation with the CEO & Managing Director or Chief Financial Officer, pursuant to Regulations.

6. Policy Review

In case of any subsequent changes in the provisions of the Regulations or any other regulations which makes any of the Clauses/Provisions in the Policy inconsistent with the Regulations, the provisions of the Regulations would prevail over the Policy and the Clause/ Provisions in the policy would be deemed to be modified accordingly. The Board also, at its discretion, has the power to review and revise the Policy.

7. **Disclosure on website**
   As required under the SEBI Regulations, the Policy will be disclosed on the website of the Company. Further, the Company shall disclose on its website all such events or information which have been disclosed to the stock exchange(s) under this Regulation and such disclosure shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company. Any change in the content of its website shall be updated within two working days from the date of such change in content.

8. **Contact detail of Authorised Person**
   The Authorised Persons can be contacted on the following ID:
   cs@advancetechforge.com

DISSEMINATION
The policy shall be hosted on the website of the Company
i.e. https://www.advancetechforge.com/

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Effective Date: November 11, 2024
Date of Approval by Board of Directors: November 11, 2024

ANNEXURE-1

EVENTS WHICH SHALL BE DISCLOSED WITHOUT ANY APPLICATION OF THE GUIDELINES FOR MATERIALITY AS SPECIFIED IN SUB-REGULATION (4) OF REGULATION (30) OF THE SEBI REGULATIONS.

1. Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation/ merger/ demerger/ restructuring), or sale or disposal of any unit(s), division(s) or subsidiary of the listed entity or any other restructuring.

   Explanation-for the purpose of this sub-para, the word 'acquisition' shall mean-

   (i) Acquiring control, whether directly or indirectly, such that-
   (ii) Acquiring or agreeing to acquire shares or voting rights in, a company, whether directly or indirectly, such that-

   - The listed entity holds shares or voting rights aggregating to five percent or more of the shares or voting rights in the said company, or;
   - There has been a change in holding from the last disclosure made under sub-clause (a) of clause (ii) of the Explanation to this sub-para and such change exceeds two percent of the total shareholding or voting rights in the said Company.

2. Issuance or forfeiture of securities, spilt or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.

3. Revision in Rating(s).

4. Outcome of Meeting of the Board of Directors:

   The listed entity shall disclose to the Exchange(s), within 30 minutes of the closure of the meeting, held to consider the following:

   (a) Dividends and/ or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/ dispatched;

   (b) Any cancellation of dividend with reasons thereof;

   (c) The decision on buyback of securities;

   (d) The decision with respect to fund raising proposed to be undertaken;

   (e) Increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/ dispatched;

   (f) Reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to;

   (g) Short particulars of any other alteration of capital, including calls;

(h) Financial result;

(i) Decision on voluntary delisting by the listed entity from stock exchange(s).

5. Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the listed entity), agreement(s)/ treaty(ies)/ contract(s) with media companies) which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.
6. Fraud/defaults by promoter or Key Managerial Personnel or by listed entity or arrest of Key Managerial Personnel or promoter.
7. Change in directors, Keu Managerial Personnel (Managing Director, Chief Financial Officer, Company Secretary etc.), Auditor and Compliance.
8. Appointment or discontinuation of share transfer agent.
9. Corporate debt restructuring.
10. One time settlement with a bank.
11. Reference to BIFR and winding-up petition filed by any party/creditors.
12. Issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the listed entity.
13. Proceedings of Annual and Extraordinary General Meeting of the listed entity.
14. Amendments to Memorandum and Article of Association of listed entity, in brief.
15. Schedule of Analyst or institutional investor meet and presentations on financial results made by the listed entity to analysts or institutional investors.

ANNEXURE-2

ILLUSTRATIVE LIST OF EVENTS WHICH SHALL BE DISCLOSED UPON APPLICATION OF VENTS WHICH SHALL BE DISCLOSED UPON APPLICATION OF THE GUIDELINES FOR MATERIALITY

1) Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/ division.
2) Change in the general character or nature of business brought 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).
3) Capacity addition or product launch.
4) Awarding, bagging/ receiving, amendment or termination of awarded/ bagged orders/ contracts not in the normal course of business.
5) 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 strike, lockouts etc.
6) Effect(s) arising out of change in the regulatory framework applicable to the listed entity.
7) Litigation(s)/ dispute(s)/ regulatory action(s) with impact.
8) Fraud/ defaults etc. by directors (other than Key Managerial Personnel) or employees of listed entity.
9) Options to purchase securities including any ESOP/ ESPS Scheme.
10) Giving of guarantees or indemnity or becoming a surety for any third party.