



**SFHL Policy for Determination of Materiality of Events/Information**  
**[Pursuant to Regulation 30(4)(ii) of the SEBI (Listing Obligations and Disclosure**  
**Requirements) Regulations, 2015]**  
**[As amended on 02.08.2023]**

The SFHL Policy (the Policy) for Determination of Materiality of Events/Information shall come into effect from the date it is approved by the Board of Directors.

The Policy is being framed in compliance with the requirement stipulated under Regulation 30(4)(ii) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) for determination of materiality of events / information, based on the following criteria:

The omission of an event or information, which is likely to result in

- a) discontinuity or alteration of an event or information already available in the public domain; or
- b) significant market reaction, if the said omission came to light at a later date; or
- c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
  1. 2% of turnover, as per the last audited consolidated financial statements of the listed entity.
  2. 2% 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. 5% 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.

In cases where the above criteria are not directly applicable, an event / information shall be treated as being material, if, in the opinion of the Board Directors, the said event / information is considered material.

Explanation – An event / information relating to litigation(s) / dispute(s) / regulatory action(s) and/or giving of guarantees or indemnity or becoming a surety for any third party shall be considered as 'material' if the value involved therein exceeds the threshold limits given under point (c) above, of the Company as at the end of the immediately preceding financial year.

The Policy is for disclosure of applicable events / information among those listed under Para B of Part A of Schedule III to the Listing Regulations, and such other event / information that needs to be disclosed in the opinion of the Board of Directors of the Company.

