BLS POLYMERS LTD.™

Excellence in Compounding

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS

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POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

I. LEGAL FRAMEWORK:

In terms of Regulation 30(4)(ii) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 ('SEBI Listing Regulations') and other applicable provisions of the SEBI Listing Regulations (hereinafter collectively referred to as the 'applicable laws'), every listed entity shall make disclosures of events or information to Stock Exchange(s) which in the opinion of the Board of Directors of the listed entity are material and is required to frame a policy for the determination of the materiality of events/information for the purpose of adequate, accurate, explicit and timely disclosures of the same to the Stock Exchanges.

Further, the Industry Standards Forum has published the industry standards note on Regulation 30 of Listing Regulations which has been granted recognition through SEBI circular dated February 25, 2025. The industry standards note provides guidance for disclosure of material events/information as per Regulation 30 of SEBI Listing Regulations.

Accordingly, the Board of Directors of the BLS Polymers Limited ('**the Company**') has approved and adopted the following Policy for Determination of Materiality of Events/Information to be disclosed to the Stock Exchange(s) from time to time, in its meeting held on October 16th, 2026 and the same shall come into force after listing of the Company.

The Board shall review, and if found required, may amend this Policy from time to time.

II. APPLICABILITY:

The Policy applies in respect of disclosure of material events in relation to BLS Polymers Limited, as required under Applicable Laws. This Policy is in addition to and does not derogate from other applicable policies of BLS Polymers Limited relating to disclosure of information from time to time.

III. SCOPE AND OBJECTIVE:

The Policy will be applicable to all the events which fall under the criteria as disclosed under the Regulation 30 and other applicable regulations (if any) under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, ("Listing Regulations") relating to "Disclosure of events or information to Stock Exchanges". This Policy shall be read along with the Company's Policy on Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (fair disclosure code) framed in adherence to the principles for fair disclosure as outlined in the Listing Regulations.

Further, the objectives of the Policy are as follows:

1. To lay down the principles for determining the materiality for disclosure of events & information based on the criteria specified in Regulation 30 of SEBI Listing Regulations and circular(s) & guideline(s) issued by SEBI in this regard.
2. To ensure that the Company complies with the disclosure obligations as laid down in SEBI Listing Regulations and circular(s) & guideline(s) issued by SEBI in this regard.
3. To ensure that the information provided by the Company to the market, is timely, transparent and equally accessible to all the stakeholders including its shareholders.
4. To promote investors' confidence in the quality & integrity of the information which is publicly released by the Company and enhance the Company's credibility, reputation and stakeholder trust through transparent disclosure practices.
5. To ensure uniformity in the Company's approach with respect to public disclosures, reduce the risk of selective disclosures and raise awareness amongst various stakeholders.
6. To strengthen corporate governance standards and reinforce accountability in the disclosure process.
   To ensure consistency, accuracy and completeness of disclosures made by the Company across all communication channels.

IV. DEFINITIONS

1. "**Act**" means the Companies Act, 2013 including the Rules, Schedules and clarifications, issued by the Ministry of Corporate Affairs and any amendment thereto and/or modification thereof from time to time.

2. "Authorised Persons" shall mean the persons severally authorised by the Board of Directors to determine the materiality of events or information, ensure timely disclosure thereof to the Stock Exchanges, respond to related queries or clarifications from the Stock Exchanges, and ensure compliance with this Policy and applicable provisions of the SEBI Listing Regulations."

3. "**Board" or "Board of Directors"** shall mean the Board of Directors of BLS Polymers Limited.

4. **"Company"** shall mean BLS Polymers Limited.

5. "**Key Managerial Personnel"** means key managerial personnel as defined under sub-section (51) of section 2 of the Companies Act, 2013.

6. **"Material" or "Materiality"** includes those events and information which may materially affect the performance of the Company or the share price of the Company.

7. **"Material Events"** means events specified in Schedule III to SEBI (LODR) Regulations 2015, upon the occurrence of which a listed entity shall make disclosures to the stock exchange(s) and post such disclosures on the website of the listed entity.

8. **"Stock Exchanges"** means BSE Limited and the National Stock of India Limited, where the equity shares of the Company are listed.

9. **"Policy"** shall mean this policy as amended from time to time.

10. **"Securities"** include shares, scrips, stock, bonds, debentures and other derivative instruments of the Company which are listed/ proposed to be listed on Stock Exchanges.

11. **"Unpublished Price Sensitive Information" or "UPSI"** has the meaning as referred to in the Company's Code of Conduct for Prohibition of Insider Trading read with SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.

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

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

13. **"Relevant Employees"** means employees identified by the Company from time to time for reporting potential material events or information under this Policy

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, SEBI Listing Regulations or any other applicable law or regulation to the extent applicable to the Company.

V. MATERIAL EVENTS OR INFORMATION DISCLOSURE

1. Events or information specified in Para A of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed without any application of the guidelines for materiality. Details to be provided to the Stock Exchanges while disclosing Para A events shall be in compliance with the requirements of the circulars issued by SEBI from time to time.

2. Events or information specified in Para B of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed with application of the guidelines for materiality as defined in the Policy. Details to be provided to the Stock Exchanges while disclosing Para B events shall be in compliance with the requirements of the circulars issued by SEBI from time to time.

3. The Company shall disclose the following material events or information to Stock Exchanges:

S. No.	Category of events	Disclosure
1.	Events or information specified in **Para A of Part A** of Schedule III of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015	Shall be considered material immediately upon the occurrence of the event and accordingly, disclosed to the Stock Exchanges irrespective of their size, value, volume, frequency etc.
2.	Events or information specified in **Para B of Part A** of Schedule III of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015	Shall be disclosed upon application of the guidelines of materiality as per Clause IV of this Policy.
3.	Events or information **other than those specified in Para A and Para B of Part A** of Schedule III of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015:	Brief details of the events like major developments that are likely to affect business such as the emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc., and any other information which is exclusively known to the Company and is necessary to enable the holders of Securities of the Company to appraise its position & to avoid the establishment of a false market in such Securities, will be evaluated in terms of the materiality on case to case basis.

4. Notwithstanding the above, the events or information with respect to subsidiaries which are material for the Company shall also be disclosed.

Alternatively, the above can be presented in the below-mentioned manner:

Event or information related to	**Events / Information enlisted in**	**Parameters to be applied for determining materiality**
BLS Polymers Limited	Para A of Schedule III	Deemed Material Clause VI – Point No. 1
BLS Polymers Limited	Para B of Schedule III	Factors prescribed in Clause VII – Point No. 2
BLS Polymers Limited	Items other than Para A & Para B	Factors prescribed in Clause VII – Point No. 2, 2.3 & 3

VI. CRITERIA AND GUIDANCE FOR DETERMINATION OF MATERIALITY

Materiality has to be determined on a case-to-case basis depending on specific facts and circumstances relating to the information/event. While determining the materiality of an event/ information, the company shall apply the following criteria as specified in Regulation 30(4)(i) of SEBI Listing Regulations.

1. **Qualitative Criteria:**

1.1 the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or

1.2 the omission of an event or information is likely to result in a significant market reaction if the said omission came to light at a later date

1.3 in case where the criteria specified above are not applicable, an event/ information may be treated as material if, in the opinion of the Board of Directors or the person(s) authorized by the Board of Directors, the event/information is considered material.

2. **Quantitative Criteria:**

2.1 the omission of an event or information, whose value or the expected impact in terms of value, exceeds the **lower** of the following:

2.1.1 2% of turnover, as per the last audited financial statements

2.1.2 2% of net worth, as per the last audited financial statements, except in case the arithmetic value of the net worth is negative

2.1.3 5% of the average absolute value of profit or loss after tax, as per the last three audited financial statements

2.1.4 For the purpose of clause 2.1.3 above, it is clarified that the average of absolute value of profit or loss after tax is to be calculated by disregarding the 'sign' (positive or negative) that denotes such value.

2.2 However, in certain instances, all of the three parameters specified above may not be relevant to an event. Applying the principle of Reddendo Singula Singulis (by assigning each one to each one) to the materiality provisions of SEBI Listing Regulations, it can be said that since there are separate thresholds of 2% of turnover, 2% of net worth and 5% of average PAT, each of such values can be applied individually and a particular threshold would be relevant and applicable depending on the nature of the event/ information being assessed. For instance, any event which has an impact on the turnover or profits of the Company can be considered material by comparing the value of such event/ information with 2% of the consolidated turnover or 5% of the average PAT respectively.

Accordingly, for every event / information as listed in Para B - Part A of Schedule III of the SEBI Listing Regulations, reference can be made to the ISF note or any other circular(s), FAQ(s) issued by SEBI or Stock Exchanges from time to time.

2.3 In case where the criteria specified in sub-clause of 2.1 above are not applicable, an event/ information may be treated as material if, in the opinion of the Board of Directors or the person(s) authorized by the Board of Directors, the event/information is considered material.

3. In addition to above criteria the following factors shall also be considered for determination of materiality of event/ information:

    1. Any event/ information which directly or indirectly may affect the reputation of the Company; or

    2. Any event/ information, which if not disclosed promptly may lead to creation of false market in the securities of the Company; or

    3. Any event/ information which is not in the normal course of business;

VII. MECHANISM TO BE ADOPTED FOR IDENTIFYING AND REPORTING POTENTIAL MATERIAL INFORMATION/EVENT BY RELEVANT EMPLOYEES

1. During performance of one's role, the Relevant employee/(s) shall be responsible for identifying pertinent information/event as mentioned in Para A and Para B events as referred in Schedule III of Listing regulations which has potential to be classified as material information/event as per the policy.
2. Upon identification of potential material information/event, the relevant employee shall promptly report the details of such potential material information/event to the Authorized Person(s) as defined in Point No. XII of this Policy.
3. Any other event, even if not covered under the SEBI Listing Regulations but is potentially of price sensitive nature, must also be informed for further evaluation, to the Authorized Persons.
4. The Authorised Person(s) shall, immediately upon receipt of information from an employee, ascertain/ evaluate its materiality and requirement of disclosure after taking into account the guidelines laid down in this Policy and under various provisions of applicable laws.
5. After evaluation, adequate disclosure (if required) shall be made to the Stock Exchanges within the prescribed timelines.

Mode of Communication: The aforesaid details can be submitted to the Authorized Person(s) by the Relevant Employee using written communication methods such as emails, internal memos, or any other appropriate official means.

The details so submitted shall be authentic and comprehensive to enable the Authorised Persons to make informed decision/take appropriate actions. The Relevant Employees should exercise necessary diligence to ensure confidentiality of the details being submitted/so submitted to the Authorised Persons.

The Relevant Employees may approach the Authorised Persons for seeking guidance/clarity to ensure effective implementation of this policy.

The Company Secretary/Compliance Officer of the Company may release FAQs, and or, framework to further assist relevant employees for effective implementation of this policy.

VIII. VERIFICATION OF MARKET RUMOURS

The Company is required to confirm, deny or clarify, upon Material Price Movement, any reported event or information in the Mainstream Media which is not general in nature, and which indicates that a rumor of an impending specific event or information. The confirmation, denial or clarification would be made to the Stock Exchanges as soon as reasonably possible, however, not later than twenty-four hours from the Material Price Movement.

Directors, key managerial personnel and senior management of the Company shall provide adequate, accurate and timely response to queries raised or explanation sought by the Company in order to ensure compliance with the requirements of verification of market rumors and the Company shall disseminate the response received from such individual(s) promptly to the Stock Exchanges.

In case there are no rumors as envisaged above, the Company need not clarify the Stock Exchanges.

Any Impending specific event/information which is in connection with an unlisted subsidiary shall also be confirmed/ denied/ clarified by the Company if there is a Material Price Movement.

For the purpose of verification of market rumors, the Company shall follow the industry standards note on verification of market rumors, recognized by SEBI, as amended from time to time.

IX. TIMELINES FOR DISCLOSURE OF EVENTS/ INFORMATION

1. The Company shall ensure prompt disclosure of all material events/ information to the Stock Exchanges as soon as reasonably possible but not later than the timelines prescribed under Reg. 30 (6) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

2. The broad principles governing the timelines for disclosure of material events/ information to Stock Exchanges are highlighted below grid:

S.no	Material events/ information	Statutory timelines
i.	Event or information which pertains to a decision taken at the meeting of the Board of Directors	within 30 minutes/*3 hours from the closure of the relevant Board meeting
ii.	Event or information which emanates from within the Company	within 12 hours of the occurrence of the event or information
iii.	Event or information which does not emanate from within the Company	within 24 hours of the occurrence of the event or information
iv.	Tax Litigations or disputes, including demand notices, penalties, etc., would be disclosed based on threshold for Para B events in the following manner: a. New tax litigations or disputes b. Tax litigations or disputes, the outcomes of which are likely to have a high correlation, would be cumulated for determining materiality. Additionally, a quarterly update on ongoing material tax litigations or disputes would be provided to the Stock Exchanges in the Integrated Filing (Governance).	within twenty-four hours from the receipt of Notice Tax litigations or disputes, the outcomes of which are likely to have a high correlation, would be cumulated for determining materiality. *Provided that if all the relevant information, in respect of claims which are made against the listed entity under any litigation or dispute, other than tax litigation or dispute, in terms of sub – paragraph 8 of paragraph B of Part A of Schedule III, is maintained in the structured digital 4 database of the listed entity in terms of the provisions of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the disclosure with respect to such claims shall be made to the stock exchange(s) within seventy-two hours of receipt of the notice by the listed entity.*

v.	Event or information for which timelines have already been specified in Para A of Schedule III of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015	within the respective timelines specified in Para A of Schedule III or any notification or circular that may be issued by the relevant authorities.

** In terms of the SEBI Circular dated December 12, 2024, if the meeting of the board of directors closes after normal trading hours but more than three hours before the beginning of the next normal trading hours, then the Company shall disclose the decision pertaining to the event or information, within three hours from the closure of the board meeting.*

3. Provided further that in case of board meetings being held for more than one day, the financial results shall be disclosed within thirty minutes or three hours, as applicable, from closure of the meeting for the day on which it has been considered.

4. In case the disclosure is made after the timelines specified above of the occurrence of such event/ information, the Company shall, along with such disclosure(s) provide an explanation for the delay.

5. The Company shall disclose to the stock exchanges material updates on the events/ information disclosed under this Policy till such time the event is resolved/ closed, with relevant explanations.

6. For the purpose of disclosure of events under the SEBI Listing Regulations, the Company shall also follow the applicable industry standards note, recognized by SEBI, from time to time. Without prejudice to the generality of provisions of this Policy, the Company may make additional disclosures of any event/ information as it may deem fit from time to time.

X. GUIDELINES ON OCCURRENCE OF AN EVENT/ INFORMATION

1. The occurrence of material events/information would be either by the Company's own accord or not in the hands of the Company. It can be categorized as under:

a) at the stage of discussion, negotiation, or approval, wherever required; and

b) upon occurrence of natural calamities, disruptions etc. where there is no such discussion, negotiation or approval required.

2. In the case of 1 (a) above, the events/ information can be said to have occurred upon receipt of approval of the Board. For instance, further issue of capital by rights issuance and in certain events/information after receipt of approval of both i.e., Board and shareholders.

However, considering the price sensitivity involved, for certain events e.g. decision on the declaration of dividends, disclosure shall be made on receipt of approval of the Board pending shareholder's approval. Approvals other than final approvals, such as in-principal approvals, exploratory approvals etc. will not require disclosure under this Code.

3. In the case of 1 (b) above, the events/ information can be said to have occurred when the Company becomes aware of the events/ information, or as soon as, the Officer of the Company have, or ought to have reasonably come into possession of the information in the course of the performance of their duties. The term 'officer' shall have the same meaning as defined under the Act and shall also include Promoter of the Company.

4. Events such as natural calamities or disruptions can be said to have occurred when the Committee/ Board becomes aware of the event/ information.

XI. KEY MANAGERIAL PERSONNEL AS AUTHORIZED PERSONS:

Pursuant to Regulation 30 (5) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, certain Key Managerial Personnel (KMPs) i.e. Managing Director & Chief Executive Officer ("CEO"), Whole-time Director & Chief Financial Officer ("CFO") and Company Secretary & Compliance Officer (collectively referred to as 'Authorised Persons'), are severally authorized by the Board of Directors to determine the materiality of an event/ information and disclose any event/ information whether material or otherwise, to the Stock Exchanges at an appropriate time and ensure overall compliance of this Policy.
The KMPs shall have the following powers and responsibilities for determining material events or information:

a. To review and assess an event or information that may qualify as 'material' and may require disclosure, on the basis of facts and circumstances prevailing at a given point in time.
b. To determine the appropriate time at which the disclosures are to be made to the stock exchanges based on an assessment of actual time of occurrence of an event or information.
c. To disclose developments that are material in nature on a regular basis, till such time the event or information is resolved/closed, with relevant explanations.
d. To consider such other events or information that may require disclosure to be made to the stock exchanges which are not explicitly defined in the SEBI Listing Regulations and determine the materiality, appropriate time and contents of disclosure for such matters.
e. responding to and coordinating with the stock exchanges in relation to any queries, clarifications or information sought by them in respect of disclosures made by the Company, or any other matter relating to such events or information, as may be applicable.
f. To disclose all events or information with respect to the subsidiaries which are material for the Company.

Contact details of the Authorised Persons are as under:

Designation	Address
Company Secretary and Compliance Officer	Corp Office Address: 3rd Floor, Vijaya Building, Barakhamba Road, Connaught Place, New Delhi- 110001 Phone : 9355188801 Email id: secretarial@blspolymers.com

XII. QUERIES BY STOCK EXCHANGES

The Company shall provide a adequate reply to all queries raised by stock exchange(s) with respect to any events or information. The Company may on its own initiative also, confirm or deny any reported event or information to stock exchange(s).

XIII. DISCLOSURE OF THE POLICY

a) The Policy shall be disclosed on website of the Company.
b) The contact details of authorized KMPs shall be also disclosed to the stock exchange(s) and on the Company`s website and changes therein.
c) The Company shall disclose on its website all such events or information which have been disclosed to stock exchange(s) under Regulation 30 of the SEBI Listing Regulations, and such disclosures 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 as disclosed on its website.

XIV. AMENDMENTS:

This policy is framed pursuant to the provisions of Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015 and in compliance with provisions of Companies Act, 2013.

The Board of Directors, based on the recommendation of the Audit Committee of the Company, shall review this Policy atleast once in three years or such other earlier periodicity as it may deem fit and may amend this Policy from time to time.

XV. Scope and Limitation:

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

This Policy will be reviewed periodically by the Board and amended as appropriate.

Effective Date: 16-10-2026