



CLAY CRAFT
FINE TABLEWARE
•INDIA•

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS/INFORMATION

CLAY CRAFT INDIA LTD

(formerly known as Clay Craft (India) Private Limited)

CIN: U26933RJ1988PLC004677

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POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS/INFORMATION

1. OVERVIEW

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Listing Regulations") requires every listed entity to disclose events or information which in the opinion the Board of Directors ("the Board") of the Company are material. Accordingly, the Board of Clay Craft India Ltd ("the Company") at its Board Meeting held on 20th August, 2025 approved and adopted this policy on determination of materiality of events/information which are required to be disclosed to the Stock Exchanges in terms of Regulation 30 of the Listing Regulations.

2. OBJECTIVE

The main objective of the policy is to determine materiality of events or information on the basis of criteria specified under Regulation 30(4)(i) of the Listing Regulations and to facilitate timely and adequate disclosure of material events or information which are unpublished & price sensitive and have a bearing on the performance or operations of the Company or may result in a significant market reaction in the price of securities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.

3. DEFINITIONS

- (i) "Act" means the Companies Act, 2013, rules framed thereunder and any amendments thereto;
- (ii) "Board" or "Board of Directors" means the Board of Directors as defined under Section 2(10) of the Companies Act, 2013;
- (iii) "Company" means Clay Craft India Ltd;
- (iv) "Key Managerial Personnel" shall have the same meaning as defined under Section 2(51) of the Act;
- (v) "Material events or information" means events or information as defined under the Listing Regulations;
- (vi) "Officer" shall have the same meaning as defined under Section 2(59) of the Act.

The words and expressions used and not defined in this policy but defined in the Companies Act, 2013 or rules made there under or the Securities and Exchange Board of India Act, 1992 or regulations made there under or Depositories Act, 1996 shall have the same meanings respectively assigned to them in those acts, rules and regulations.

4. EVENTS OR INFORMATION COVERED UNDER THIS POLICY

The Regulation 30 of the Listing Regulations prescribes, norms for such disclosure of material information pertaining to listed entity as under:

- (a) Events specified in para A of part A of Schedule III of the Listing Regulations are required to be disclosed irrespective of application of the guidelines for materiality.

- (b) Events specified in para B of part A of Schedule III of the Listing Regulations are required to be disclosed to the Stock Exchanges if they are considered material by the Company.

Any other information/event mandatorily required to be disclosed as may be specified by the SEBI from time to time including but not restricting to the events specified in of PART A of SCHEDULE III of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements), Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

5. CRITERIA FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION

The Company shall consider the following criteria for determination of materiality of events/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;
- (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) The omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - (1) Two percent of turnover, as per the last audited consolidated financial statements of the Company;
 - (2) Two percent 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;
 - (3) Five percent 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 sub-clauses (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the Company, the event or information is considered material.

6. DISCLOSURE

- (a) The Company shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions of this regulation as soon as reasonably possible and in any case not later than the following:
 - (i) Thirty minutes from the closure of the meeting of the board of directors in which the decision pertaining to the event or information has been taken:

Provided that in case the meeting of the board of directors 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:

Provided further that in case the meeting of the board of directors is being

held for more than one day, the financial results shall be disclosed within thirty minutes or three hours, as applicable, from closure of such meeting for the day on which it has been considered.

- (ii) Twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the Company;
- (iii) Twenty four hours from the occurrence of the event or information, in case the event or information is not emanating from within the Company:

Provided that if all the relevant information, in respect of claims which are made against the Company 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 database of the Company in terms of 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 Company:

Provided further that disclosure with respect to events for which timelines have been specified in Part A of Schedule III shall be made within such timelines:

Provided further that in case the disclosure is made after the timelines specified under this regulation, the Company shall, along with such disclosure provide the explanation for the delay.

Explanation: Normal trading hours shall mean time period for which the recognized stock exchanges are open for trading for all investors.

- (b) The Company shall, with respect to disclosures referred to in this regulation, make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.
- (c) The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, 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 entity, as disclosed on its website.
- (d) The Company shall disclose all events or information with respect to subsidiaries which are material for the Company.
- (e) The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information:

Provided that the stock exchange(s) shall disseminate information and clarification as soon as reasonably practicable.

- (f) The Company may on its initiative also, confirm or deny any reported event or information to stock exchange(s):

Provided that the top 100 listed entities and thereafter the top 250 listed entities,

with effect from the date specified by the Board, shall confirm, deny or clarify, upon the material price movement as may be specified by the stock exchanges, any reported event or information in the mainstream media which is not general in nature and which indicates that rumour of an impending specific event or information is circulating amongst the investing public, as soon as reasonably possible but in any case not later than twenty four hours from the trigger of material price movement:

Provided further that if the Company confirms the reported event or information, it shall also provide the current stage of such event or information:

Provided further that when the Company confirms within twenty four hours from the trigger of material price movement, any reported event or information on which pricing norms provided under Chapter V or Chapter VI of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or pricing norms provided under Regulation 8 or Regulation 9 of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 or pricing norms provided under Regulation 19 or Regulation 22B of the Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018 or any other pricing norms specified by the Board or the stock exchanges are applicable, then the effect on the price of the equity shares of the Company due to the material price movement and confirmation of the reported event or information may be excluded for calculation of the price for that transaction as per the framework as may be specified by the Board.

- (g) The promoter, director, key managerial personnel or senior management of a 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 under sub-regulation 11 of this regulation and the Company shall disseminate the response received from such individual(s) promptly to the stock exchanges.
- (h) In case where an event occurs or an information is available with the Company, which has not been indicated in Para A or B of Part A of Schedule III, but which may have material effect on it, the Company is required to make adequate disclosures in regard thereof.
- (i) In case an event or information is required to be disclosed by the Company in terms of the provisions of this regulation, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

7. AUTHORIZATION FOR THE PURPOSE OF DETERMINING MATERIALITY OF ANY EVENT OR INFORMATION AND MAKING DISCLOSURE TO THE STOCK EXCHANGES

The Board of the Company has severally authorized the Key Managerial Personnel's i.e. Managing Director, Chief Financial Officer and Company Secretary and Compliance Officer of the Company for the purpose of determining materiality of an event or information and for making the disclosure in this regard. The contact details of aforesaid Key Managerial Personnel are provided here under:

Sr. No.	Designation	Email address	Contact Number
1	Managing Director	ir@claycraftindia.com	+91-141-2261002
2	Executive Director & Chief Financial Officer	ir@claycraftindia.com	
3	Company Secretary & Compliance Officer	ir@claycraftindia.com	

8. UPLOADING OF INFORMATION ON THE WEBSITE OF THE COMPANY

This policy, all amendments thereto and disclosures made by or on behalf of the Company, of events or information to the Stock Exchanges, pursuant to this policy, shall be uploaded on the website of the Company.

9. AMENDMENT

The Board of Directors is authorized to make modifications/amendments to this policy in consonance to the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015 and any amendment thereto and the decision of the Board in this respect shall be final and binding. Any subsequent amendment/modification in the Regulation and/or other applicable laws in this regard shall automatically apply to this policy.

Approved in the Board Meeting held on 20th August, 2025.
