

TWENTYFIRST CENTURY MANAGEMENT SERVICES LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION

[Pursuant to Regulation 30 (4) (ii) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015]

1. Objective

To lay down criteria for determining materiality of events / information and ensure timely, accurate, and transparent disclosures to stock exchanges, further to assist the relevant employees of the Company in identifying any potential material event or information and reporting the same to the authorized Key Managerial Personnel, in terms of sub-regulation (5), regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. Regulatory Framework

This Policy is framed under Regulation 30(4) (ii) of the SEBI (LODR) Regulations, 2015, amended from time to time. This Policy is amended and approved by the Board of Directors at their meeting held on 27.05.2026.

3. Scope of Disclosure

Events / information that shall be mandatorily disclosed include:

- Events specified in **Para A of Part A of Schedule III** – (deemed to be material events).
- Events specified in **Para B of Part A of Schedule III** - Material events as determined under this Policy

4. Criteria for Determining Materiality

Events/information shall be considered material if:

- 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) 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 listed entity;
 2. two percent 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. 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 listed entity.
- 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 listed entity, the event or information is considered material.



5. Authority for Determination

Chief Executive Officer and / or Managing Director, Chief Financial Officer, and Company Secretary are jointly or severally authorized for determination of materiality.

- Roles and Responsibilities:
 - Evaluate and determine whether an event or information is material based on criteria outlined in this Policy.
 - Ensure that disclosure of such material event/information is made to the stock exchanges within the prescribed timelines.
 - Monitor developments related to ongoing events and provide updates or final outcomes as required under SEBI LODR.
 - Respond to queries or clarification sought by stock exchanges.
 - Review and confirm or deny material market rumours as per Regulation 30(11), where applicable.

6. Timeline for Disclosure

Disclosures must be made within the respective timelines specified in Regulation 30 read with Schedule III of SEBI (LODR) Regulations, 2015.

a. Ongoing Events (e.g., investigations, negotiations, litigations):

- Initial disclosure must be made promptly upon triggering materiality.
- Updates must be provided at regular intervals (not exceeding 30 days) until closure/resolution.
- Disclosure of the final outcome/resolution is mandatory.

Note: "Occurrence of event" is interpreted as:

- For events with a definitive time (e.g., board meeting, signing of agreement): from the time of approval or execution.
- For evolving situations (e.g., litigation, fraud, negotiation): from the point when the company becomes aware or reasonably believes the event is material.

7. Review & Amendment

This Policy shall be reviewed annually or upon significant regulatory change, subject to Board approval.

8. Dissemination of Policy

The Policy and the contact details of the persons authorized by the Board are also available on the website of the Company.

This Policy is amended and approved by the Board of Directors at their meeting held on 27.05.2026



**Details of persons authorized
under Regulation 30(5) of SEBI (Listing Obligations and
Disclosure Requirements) Regulations, 2015**

The Board of Directors of the Company has authorized Whole Time Director(s), Chief Financial Officer and Company Secretary of the Company, to act jointly or severally, and in case of absence of any member, the remaining members are authorized to act independently to avoid delay in disclosure, for the purpose of making disclosures as stipulated under the said regulation.

The contact details are as given below:

W.S. Industries (India) Limited
3rd Floor, New No.48, Old No.21,
Savidhaanu Building,
Casa Major Road, Egmore,
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