MANGLAM INFRA & ENGINEERING LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

Version Control

Version	*Approval/Amendment Date*	*Approved by*
1	*December 01, 2023*	*Board of Directors*
2	*August 10, 2026*	*Board of Directors*

I. LEGAL FRAMEWORK AND BACKGROUND

Manglam Infra & Engineering Limited (the "**Company**") is committed to being open and transparent with all stakeholders and believes in disseminating information in a fair and timely manner. This Policy for Determination of Materiality of Events or Information ("**Policy**") is aimed at providing guidelines to the management of Company, to determine the materiality of events or information, which could affect investment decisions and to ensure timely and adequate dissemination of information to the Stock Exchange(s).

Regulation 30 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Listing Regulations") requires the Company to frame a policy for determination of materiality of events/information based on the criteria specified in Regulation 30 for disclosure to the Stock Exchanges and hosting it on the website of the Company.

II. OBJECTIVE

The objectives of this policy are as follows:

1. To ensure that the Company complies with the disclosure obligations to which it will be subject to as publicly-traded company as laid down by the Listing Regulations, various Securities Laws and any other legislations (In India or Overseas).

2. To ensure that the information disclosed by the Company is timely and transparent.

3. To ensure that corporate documents and public statements are accurate and do not contain any misrepresentation.

4. To protect the confidentiality of Material / Price sensitive information within the context of the Company's disclosure obligations.

5. To provide a framework that supports and fosters confidence in the quality and integrity of information released by the Company.

6. To ensure uniformity in the Company's approach to disclosures, raise awareness and reduce the risk of selective disclosures.

III. DEFINITIONS

1. "**Act**" means the Companies Act, 2013 and as amended, modified or replaced from time to time and includes any statutory replacement or re-enactment thereof, and to the extent that any provisions of the Companies Act, 2013, including any rules made thereunder.

2. The **"Company"** means **Manglam Infra & Engineering Limited (MIEL)**

3. "**Board of Directors**" means the Board of Directors of the Company as constituted from time to time.

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

5. "**SEBI Listing Regulations**" mean the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, including any modification, clarifications, circulars or reenactments thereof.

6. "**Policy**" means this policy, as amended from time to time.

7. “**SEBI**” means the Securities and Exchange Board of India.

8. “**Rules**” means the rules made under the Act.

9. “**Stock Exchange**” means such stock exchange where the equity shares of the Company are listed.

10. **“Schedule III”** means Schedule III of Listing Regulations and include circulars issued by Securities Exchange Board of India from time to time in relation to Regulation 30 of the Listing Regulations.

11. **"Authorised Key Managerial Personnel" or "Authorised KMP"** means the Key Managerial Personnel authorised by the Board of Directors under Regulation 30(5) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the purpose of determining the materiality of an event or information and for making disclosures to the Stock Exchange(s).

12. **"Material Event" or "Material Information"** means any event or information relating to the Company and/or its material subsidiary(ies) which is required to be disclosed under Regulation 30 read with Schedule III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, or which is determined to be material in accordance with this Policy.

13. **"Material Subsidiary"** shall have the same meaning as assigned to it under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

The Words and expressions used but not defined in this Policy shall have the meanings respectively assigned to them under the Companies Act, 2013, the SEBI Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996, the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the rules, regulations, circulars or statutory modifications made thereunder, as amended from time to time.

IV. APPLICABILTY OF THE POLICY GUIDELINES

In terms of Regulation 30 of the Listing Regulations (as amended from time to time), the events requiring disclosure by the Company, are provided as under:

1. Events specified in Para A of Part A of Schedule III of the Listing Regulations and shall be deemed to be material and the Company is required to make disclosure of the same, as applicable from time to time. List of such events is attached as **Annexure 1** to this Policy.

2. Events specified in Para B of Part A of Schedule III of the Listing Regulations shall be disclosed by the Company based on the guidelines determining materiality of events or information as per Clause IV below. List of such events is attached as **Annexure 2** to this Policy.

V. GUIDELINESFOR DETERMINING MATERIALITY OF EVENTS ORINFORMATION

I. Events or Information which are deemed to be Material

The Company shall disclose all such events or information pertaining to itself and/or its material subsidiary(ies), as specified in **Para A of Part A of Schedule III** of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time ("Listing Regulations"). Such events shall be deemed to be material and shall be disclosed without application of the materiality criteria.

II. Events or Information requiring application of Materiality Criteria

The Company shall disclose all such events or information pertaining to itself and/or its material subsidiary(ies), as specified in **Para B of Part A of Schedule III** of the Listing Regulations, based on the materiality criteria set out below:

(i) Quantitative Criteria

An event or information shall be considered material if its value or the expected impact in terms of value exceeds the lower of the following:

a. Two percent (2%) of the turnover, as per the last audited financial statements of the Company;
b. Two percent (2%) of the net worth, as per the last audited financial statements of the Company, except where the arithmetic value of the net worth is negative; or
c. Five percent (5%) of the average of the absolute value of profit or loss after tax, as per the last three audited financial statements of the Company.

(ii) Qualitative Criteria

An event or information shall also be considered material if:

a. the omission of such event or information is likely to result in discontinuity or alteration of an event or information already available publicly; or
b. the omission of such event or information is likely to result in significant market reaction if such omission comes to light at a later date.

(iii) Residual Criteria

Where the criteria specified in sub-clauses (i) and (ii) are not applicable, an event or information may nevertheless be considered material if, in the opinion of the Board of Directors or any Key Managerial Personnel authorised by the Board under Regulation 30(5) of the Listing Regulations, such event or information is material having regard to its nature, significance or potential impact on the Company.

III. Other Material Events or Information

The Company shall disclose any other event or information which, though not specifically covered under **Para A** or **Para B** of **Part A of Schedule III** of the Listing Regulations, is considered material by the Company and is likely to affect its business, operations, financial position or reputation, or is necessary to enable investors to make informed investment decisions or to prevent the establishment of a false market in the securities of the Company.

Without prejudice to the above, the Company may disclose any other event or information as may be required under the Listing Regulations, SEBI circulars, or any other applicable law, or as may be considered appropriate by the Board or the Authorised Key Managerial Personnel in the interest of transparency and good corporate governance.

VI. <u>DISCLOSURES OF EVENTS OR INFORMATION</u>

1. The Company shall disclose to the Stock Exchange(s) all material events or information required under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") within the timelines prescribed therein and the circulars issued by SEBI from time to time.

2. Events specified in **Para A of Part A of Schedule III** of the Listing Regulations shall be deemed to be material and shall be disclosed without application of the materiality criteria.

3. Events specified in **Para B of Part A of Schedule III** of the Listing Regulations shall be disclosed upon application of the materiality criteria specified in this Policy.

4. The disclosure shall be made:

    - within **30 minutes** from the conclusion of the Board Meeting, in case of events requiring approval of the Board of Directors;
    - within **12 hours** from the occurrence of the event or information, where the event or information originates from within the Company; and
    - within **24 hours** from the occurrence of the event or information, where the event or information is not emanating from within the Company.

5. Where the disclosure is made after the prescribed timelines, the Company shall provide an explanation for such delay along with the disclosure, wherever required under the Listing Regulations.

6. The Company shall disclose material developments relating to previously disclosed events on a regular basis till such events are resolved or closed, with relevant explanations.

7. The Company shall provide appropriate clarification, confirmation or denial in respect of any reported event or information, if required under the Listing Regulations or upon receipt of any query from the Stock Exchange(s).

8. All disclosures made to the Stock Exchange(s) under Regulation 30 of the Listing Regulations shall also be hosted on the website of the Company for a minimum period of five years and thereafter in accordance with the Company's Policy for Preservation of Documents and Archival Policy.

9. Nothing contained in this Policy shall restrict the Company from making disclosure of any event or information which, in the opinion of the Board of Directors or the Authorised Key Managerial Personnel, is material or necessary in the interest of investors or in compliance with applicable laws.

VII. <u>AUTHORITY TO DETERMINE MATERIALITY OF ANY EVENT</u>

The Managing Director, the Chief Financial Officer and the Company Secretary/ Compliance Officer (Authorized KMP) have been authorized by the board of directors to determine the materiality of an event or information and to make appropriate disclosure on a timely basis and be disseminated to the Stock Exchange(s) by the Authorised Key Managerial Personnel of the Company. The Authorized KMPs are also empowered to seek appropriate counsel or guidance, as and when necessary, from other internal or external stakeholders as they may deem fit.

The Authorized Persons will then ascertain the materiality of such event(s) or information based on the above guidelines. On completion of the assessment, the Authorized Persons shall make appropriate disclosure(s) to the Stock Exchange and on the Website of the Company.

VIII. <u>POWERS AND RESPONSIBILITIES OF THE AUTHORISED PERSON FOR DETERMINING MATERIAL EVENTS OR INFORMATION WITHIN THE COMPANY</u>

1. 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.

2. The disclosure shall be finalized in consultation with the Managing Director and CFO and in his absence with the Company Secretary. For this purpose, the relevant details of event or information shall be sent to the Authorized Persons promptly or as soon as practicable to enable its disclosure to the stock exchanges.

3. To make required disclosures within the stipulated time of actual occurrence of an event or information, after ascertaining facts.

4. To disclose material developments on a regular basis, till such time the event or transaction is resolved/closed, with relevant explanations.

5. 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 Regulations and determine the materiality, appropriate time and contents of disclosure for such matters.

IX. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force. In case of any amendment(s), clarification(s), circular(s), notification(s), etc., issued by the relevant authorities that are inconsistent with the provisions of this Policy, such amendment(s), clarification(s), circular(s), notification(s), etc. shall prevail over the provisions contained herein, and this Policy shall be deemed to have been amended accordingly with effect from the effective date specified in such amendment(s), clarification(s), circular(s), notification(s), etc.

X. SCOPE AND LIMITATION

In the event of any conflict between the provisions of this Policy, Companies Act, 2013 and Regulations or any other statutory enactments, rules, the provisions of Companies Act, such Regulations, or any such statutory enactments, rules 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.

XI. POLICY REVIEW

The Authorized Persons may review the Policy from time to time. If there is any inconsistency between the terms of the Policy and the Listing Regulations, the provisions of the Listing Regulations shall prevail.

XII. DISSEMINATION OF POLICY

This Policy shall be hosted on the website of the Company i.e. www.manglaminfra.com

*****

Annexure 1

As prescribed under Para A of Part A of Schedule III of the SEBI Listing Regulations

A. Events which shall be disclosed without any application of the guidelines for materiality as specified in sub-regulation (4) of regulation (30):

1. Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation, merger, demerger or restructuring), sale or disposal of any unit(s), division(s), whole or substantially the whole of the undertaking(s) or subsidiary of the Company, sale of stake in associate company of the Company or any other restructuring.

   The term acquisition shall mean: -

   (i) acquiring control, whether directly or indirectly; or,
   (ii) acquiring or agreeing to acquire shares or voting rights in, a company, whether directly or indirectly, such that –
      (a) the Company holds shares or voting rights aggregating to 20% or more of the shares or voting rights in the said company, or;
      (b) there has been a change in holding from the last disclosure made and such change exceeds 5% of the total shareholding or voting rights in the said company, or;
      (c) the cost of acquisition or the price at which the shares are acquired exceeds the threshold specified Clause V of this policy.

   "Provided that acquisition of shares or voting rights aggregating to five percent or more of the shares or voting rights in an unlisted company and any change in holding from the last disclosure made under this proviso exceeding two percent of the total shareholding or voting rights in the said unlisted company shall be disclosed on a quarterly basis in the format as may be specified."

   The terms "sale or disposal of subsidiary" and "sale of stake in associate company" shall mean:
   (i) an agreement to sell / sale of shares / voting rights in a company such that the company ceases to be a wholly owned subsidiary, a subsidiary or an associate company of the company; or
   (ii) an agreement to sell or sale of shares or voting rights in a subsidiary or associate company such that the amount of the sale exceeds the threshold specified in Clause V of this policy.

2. Issuance or forfeiture of securities, split 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. New Rating(s) or Revision in Rating(s).

4. Outcome of Meetings of the board of directors: The Company shall disclose to the Exchange(s), the outcome of meetings of the board of directors, held to consider the following:
   a) dividends 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 including by way of issue of securities (excluding security receipts, securitized debt instruments or money market instruments regulated by the Reserve Bank of India), through further public offer, rights issue, American Depository Receipts/ Global Depository Receipts/ Foreign Currency Convertible Bonds, qualified institutions placement, debt issue, preferential issue or any other method;
   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 alterations of capital, including calls;
h) financial results;
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.

   5A. Agreements entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the Company or of its holding, subsidiary or associate company, among themselves or with the Company or with a third party, solely or jointly, which, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the Company or impose any restriction or create any liability upon the Company, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the Company is a party to such agreements:

   Provided that such agreements entered into by a Company in the normal course of business shall not be required to be disclosed unless they, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the Company or they are required to be disclosed in terms of any other provisions of these regulations.

6. Fraud or defaults by promoter, director, key managerial personnel, senior management or subsidiary or arrest of key managerial personnel, senior management, promoter or director of the Company, whether occurred within India or abroad.
   For the purpose of this sub-paragraph:
   i. "Fraud" shall include fraud as defined under Regulation 2(1)(c) of the Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.
   ii. "Default" shall mean non-payment of the interest or principal amount in full on the date when the debt has become due and payable.

   Explanation 1- In case of revolving facilities like cash credit, an entity would be considered to be in 'default' if the outstanding balance remains continuously in excess of the sanctioned limit or drawing power, whichever is lower, for more than thirty days.
   Explanation 2- Default by a promoter, director, key managerial personnel, senior management, subsidiary shall mean default which has or may have an impact on the listed entity.
   Explanation 3 – Fraud by senior management, other than who is promoter, director or key managerial personnel, shall be required to be disclosed only if it is in relation to the listed entity.

7. Change in directors, key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.) senior management, Auditor and Compliance Officer.

   7A. In case of resignation of the auditor of the Company, detailed reasons for resignation of auditor, as given by the said auditor, shall be disclosed by the Company to the stock exchanges as soon as possible but not later than twenty-four hours of receipt of such reasons from the auditor.

   7B. Resignation of independent director including reasons for resignation: In case of resignation of an independent director of the Company, within seven days from the date of resignation, the following disclosures shall be made to the stock exchanges by the listed entities:

i. The letter of resignation and detailed reasons for the resignation are given by the said director. (ia). Names of listed entities in which the resigning director holds directorships, indicating the category of directorship and membership of board committees, if any.

ii. The independent director shall, along with the detailed reasons, also confirm that there are no other material reasons other than those provided.

iii. The confirmation as provided by the independent director above shall also be disclosed by the listed entities to the stock exchanges along with the disclosures as specified in sub-clause (i) and (ii) above.

7C. In case of resignation of key managerial personnel, senior management, Compliance Officer or director other than an independent director; the letter of resignation along with detailed reasons for the resignation as given by the key managerial personnel, senior management, Compliance Officer or director shall be disclosed to the stock exchanges by the Company within seven days from the date that such resignation comes into effect.

7D. In case the Managing Director or Chief Executive Officer of the Company was indisposed or unavailable to fulfill the requirements of the role in a regular manner for more than forty five days in any rolling period of ninety days, the same along with the reasons for such indisposition or unavailability, shall be disclosed to the stock exchange(s).

8. Appointment or discontinuation of share transfer agent.

9. Resolution plan/ Restructuring in relation to loans/borrowings from banks/financial institutions including the following details:
   i. Decision to initiate resolution of loans/borrowings;
   ii. Signing of Inter-Creditors Agreement (ICA) by lenders;
   iii. Finalization of Resolution Plan;
   iv. Implementation of Resolution Plan;
   v. Salient features, not involving commercial secrets, of the resolution/ restructuring plan as decided by lenders.

10. One time settlement with a bank.

11. 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 Company.

13. Proceedings of Annual and extraordinary general meetings of the Company.

14. Amendments to memorandum and articles of association of Company, in brief.

15. (a) (i) Schedule of analysts or institutional investors meet at least two working days in advance (excluding the date of the intimation and the date of the meet)].
    (ii) Presentations prepared by the listed entity for analysts or institutional investors meet, post earnings or quarterly calls shall be disclosed to the recognized stock exchanges prior to beginning of such events.
    Explanation I: For the purpose of this clause 'meet' shall mean group meetings or group conference calls conducted physically or through digital means.
    Explanation II: Disclosure of names in the schedule of analysts or institutional investors meet shall be optional for the listed entity.

    (b) Audio recordings, video recordings, if any, and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means, in the following manner:

(i) The audio recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier;
(ii) the video recordings, if any, shall be made available on the website within forty-eight hours from the conclusion of such calls;
(iii) the transcripts of such calls shall be made available on the website along with simultaneous submission to recognized stock exchanges within five working days of the conclusion of such calls.

16. The following events in relation to the corporate insolvency resolution process (CIRP) of a listed corporate debtor under the Insolvency Code:
   a. Filing of application by the corporate applicant for initiation of CIRP, also specifying the amount of default;
   b. Filing of application by financial creditors for initiation of CIRP against the corporate debtor, also specifying the amount of default;
   c. Admission of application by the Tribunal, along with amount of default or rejection or withdrawal, as applicable;
   d. Public announcement made pursuant to order passed by the Tribunal under section 13 of Insolvency Code;
   e. List of creditors as required to be displayed by the corporate debtor under regulation 13(2)(c) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;
   f. Appointment/ Replacement of the Resolution Professional;
   g. Prior or post-facto intimation of the meetings of Committee of Creditors;
   h. Brief particulars of invitation of resolution plans under section 25(2)(h) of Insolvency Code in the Form specified under regulation 36A(5) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;
   i. Number of resolution plans received by Resolution Professional;
   j. Filing of resolution plan with the Tribunal;
   k. Approval of resolution plan by the Tribunal or rejection, if applicable;
   l. Specific features and details of the resolution plan as approved by the Adjudicating Authority under the Insolvency Code, not involving commercial secrets, including details such as:
      i. Pre and Post net-worth of the company;
      ii. Details of assets of the company post CIRP;
      iii. Details of securities continuing to be imposed on the companies' assets;
      iv. Other material liabilities imposed on the company;
      v. Detailed pre and post shareholding pattern assuming 100% conversion of convertible securities;
      vi. Details of funds infused in the company, creditors paid-off;
      vii. Additional liability on the incoming investors due to the transaction, source of such funding etc.;
      viii. Impact on the investor – revised P/E, RONW ratios etc.;
      ix. Names of the new promoters, key managerial personnel, if any and their past experience in the business or employment. In case where promoters are companies, history of such company and names of natural persons in control;
      x. Brief description of business strategy.

   m. Any other material information not involving commercial secrets;
   n. Proposed steps to be taken by the incoming investor/acquirer for achieving the MPS;
   o. Quarterly disclosure of the status of achieving the MPS;
   p. The details as to the delisting plans, if any approved in the resolution plan.

17. Initiation of Forensic audit: In case of initiation of forensic audit, (by whatever name called), the following disclosures shall be made to the stock exchanges by Company:

a. The fact of initiation of forensic audit along-with name of entity initiating the audit and reasons for the same, if available;

b. Final forensic audit report (other than for forensic audit initiated by regulatory / enforcement agencies) on receipt by the Company along with comments of the management, if any.

c.

Explanation – For the purpose of this sub-paragraph, forensic audit refers to the audits, by whatever name called, which are initiated with the objective of detecting any mis-statement in financial statements, mis-appropriation, siphoning or diversion of funds and does not include audit of matters such as product quality control practices, manufacturing practices, recruitment practices, supply chain process including procurement or other similar matters that would not require any revision to the financial statements disclosed by the Company.

18. Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel or senior management of a Company, in relation to any event or information which is material for the Company in terms of regulation 30 of these regulations and is not already made available in the public domain by the Company.

    Explanation – "social media intermediaries" shall have the same meaning as defined under the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

19. Action(s) initiated or orders passed by any regulatory, statutory, enforcement authority or judicial body against the Company or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the Company, in respect of the following:
    a. search or seizure; or
    b. re-opening of accounts under section 130 of the Companies Act, 2013; or
    c. investigation under the provisions of Chapter XIV of the Companies Act, 2013; along with the following details pertaining to the actions(s) initiated, taken or orders passed:
        i. name of the authority;
        ii. nature and details of the action(s) taken, initiated or order(s) passed;
        iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority;
        iv. details of the violation(s)/contravention(s) committed or alleged to be committed;
        v. impact on financial, operation or other activities of the Company, quantifiable in monetary terms to the extent possible.

20. Action(s) taken or orders passed by any regulatory, statutory, enforcement authority or judicial body against the Company or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the Company, in respect of the following:
    a. suspension;
    b. imposition of fine or penalty;
    c. settlement of proceedings;
    d. debarment;
    e. disqualification;
    f. closure of operations;
    g. sanctions imposed;
    h. warning or caution; or
    i. any other similar action(s) by whatever name called;

    along with the following details pertaining to the actions(s) taken or orders passed:
        i. name of the authority;
        ii. nature and details of the action(s) taken or order(s) passed;
        iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority;
        iv. details of the violation(s)/contravention(s) committed or alleged to be committed;
        v. impact on financial, operation or other activities of the Company, quantifiable in monetary terms to the extent possible.

Explanation – Imposition of fine or penalty shall be disclosed in the following manner along with the details pertaining to the action(s) taken or orders passed as mentioned in the sub-paragraph:

i. disclosure of fine or penalty of rupees one lakh or more imposed by sectoral regulator or enforcement agency and fine or penalty of rupees ten lakhs or more imposed by other authority or judicial body shall be disclosed within twenty- four hours.
ii. disclosure of fine or penalty imposed which are lower than the monetary thresholds specified in the clause (i) above on a quarterly basis in the format as may be specified.

21. Voluntary revision of financial statements or the report of the board of directors of the Company under section 131 of the Companies Act, 2013.

Annexure 2

As prescribed under Para B of Part A of Schedule III of the SEBI Listing Regulations

B. Events which shall be disclosed upon application of the guidelines for materiality referred to sub-regulation (4) of regulation (30):

1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2. Any of the following events pertaining to the Company:
   (a) arrangements for strategic, technical, manufacturing, or marketing tie-up; or
   (b) adoption of new line(s) of business; or
   (c) closure of operation of any unit, division or subsidiary (in entirety or in 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. Agreements (viz. loan agreement(s) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
6. Disruption of operations of any one or more units or division of the Company due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
7. Effect(s) arising out of change in the regulatory framework applicable to the Company.
8. Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the Company.
9. Frauds or defaults by employees of the Company which has or may have an impact on the Company.
10. Options to purchase securities including any ESOP/ESPS Scheme.
11. Giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party.
12. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
13. Delay or default in the payment of fines, penalties, dues etc to any regulatory, statutory, enforcement or judicial authority.

C. Any other information/event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities.

D. Without prejudice to the generality of para (A), (B) and (C) above, the Company may make disclosures of event/information as specified by the Board from time to time.

<u>Contact details of key managerial personnel who are authorized for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s)and as well as on the listed entity's website as required under sub-regulation (5) of regulation 30 of Listing Regulations.</u>

Pursuant to Regulation 30(5) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, please note that the following Key Managerial Personnel of the Company are severally authorized for the purpose of determining the materiality of an event or information to the Stock Exchange(s):

S. No	Contact Person	Contact Detail
1.	Managing Director	Manglam Infra & Engineering Limited <u>Registered Office:</u> 115 &116 Ganesh Nagar, Hoshangabad Road, Bhopal Madhya Pradesh 462026, IN. Phone: +91-755 4353460 Email: info@manglaminfra.com
2.	Chief Financial Officer	
3.	Company Secretary & Compliance officer	

The following Key Managerial Personnel of the Company are severally authorized for the purpose of dissemination of material event/information to the Stock Exchange

S. No	Contact person	Contact Detail
1.	Chief Financial Officer	Manglam Infra & Engineering Limited <u>Registered Office:</u> 115 &116 Ganesh Nagar, Hoshangabad Road, Bhopal Madhya Pradesh 462026, IN. Phone: +91-755 4353460 Email: cs@manglaminfra.com
2.	Company Secretary & Compliance officer	