



# MONARCH SURVEYORS & ENGINEERING CONSULTANTS LIMITED

(Formerly known as Monarch Surveyors & Engineering Consultants Pvt. Ltd.)

सहसा विदधीत न क्रियामविवेकः परमापदां पदम्

## POLICY ON MATERIALITY OF EVENTS AND INFORMATION

### 1. Introduction

Transparency is the cornerstone of investor confidence in a listed entity. Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR"), together with SEBI interpretative circulars dated **13 August 2021** and **14 July 2022** on continuous disclosure obligations and Board responsibilities, mandates listed entities to make prompt, clear, and complete disclosures of material events and information.

Accordingly, Monarch Surveyors and Engineering Consultants Limited ("Monarch" or "the Company") is required to disclose all events or information that may reasonably be expected to influence investment decisions or affect the market price of its securities. This Policy on Materiality of Events and Information ("Policy") sets out the principles, criteria, and governance framework adopted by the Company to determine materiality and ensure timely disclosures to the stock exchanges.

### 2. Purpose

The purpose of this Policy is to:

- ensure timely and non-selective dissemination of material information to investors and other market participants;
- safeguard informed decision-making and protect minority shareholder interests;
- define qualitative and quantitative thresholds for assessing materiality; and
- establish clear accountability to ensure regulatory timelines are consistently met.

### 3. Scope

This Policy applies to Monarch and all its subsidiaries, joint ventures, and associate entities, wherever located.

Events or information relating to a subsidiary that contributes significantly to the Company's consolidated turnover, assets, or profits, as envisaged under SEBI's **May 2021** amendments, shall be evaluated for disclosure in the same manner as events at the parent entity.

### 4. Definitions

An "event" or "information" shall be considered **material** if, in the opinion of the Board of Directors or the authorised Key Managerial Personnel, its omission or misstatement is likely to:

- significantly influence the investment decisions of investors; or
- result in a substantial market reaction.

Qualitative indicators of materiality include, without limitation:

- regulatory or governmental actions;
- cancellation of significant contracts, tenders, or licences;
- adverse court or tribunal rulings;
- strategic shifts or restructuring decisions;
- impact on strategic partnerships or investor relations;
- cyber-security incidents, major IT disruptions, or data-privacy breaches; and
- any development that materially alters the Company's risk profile.

Monarch House, CTS No 434/1, B T Kawade Road, Ghorpadi, Pune 411 036, Maharashtra. India.

CIN No.: L45203PN1999PLC013830 | D&B D-U-N-S: 91 663 2276

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## 5. Policy Statement

The Company is committed to making full, fair, and timely disclosures in language that avoids ambiguity or selective interpretation.

Events specifically identified as material under **Part A of Schedule III** to SEBI LODR shall be disclosed without applying any materiality thresholds. Events covered under **Part B of Schedule III** shall be assessed using the quantitative benchmarks and qualitative factors prescribed in this Policy. Where doubt exists, the Company shall err on the side of disclosure. Disclosure shall not be withheld or delayed solely because Board approval or ratification is pending.

## 6. Governance and Authority

The Board of Directors has approved this Policy and retains ultimate responsibility for its effective implementation.

The Board has authorised the **Managing Director, Chief Financial Officer, and Company Secretary**, acting jointly or severally, to:

- determine materiality of events or information; and
- make disclosures to the stock exchanges in accordance with SEBI LODR.

The Company Secretary shall:

- maintain a register of disclosures, including reasons where an event is considered non-material;
- ensure archival of disclosures in accordance with SEBI's digital preservation requirements; and
- place anonymised logs of non-material events before the Board periodically for consistency review.

Draft disclosures shall be vetted for accuracy and completeness prior to filing. The Audit Committee shall review compliance with this Policy at each meeting and report any deviations to the Board.

## 7. Criteria for Assessing Materiality

While determining materiality, authorised officers shall consider, inter alia:

- absolute and relative monetary value of the event;
- nature of the event (isolated or systemic);
- expected duration and impact on earnings or cash flows;
- impact on creditworthiness, licences, strategic partnerships, or investor relations;
- analyst and market sensitivity;
- precedent disclosures; and
- inter-dependencies among related events.

Internal checklists and decision matrices shall be used to support consistent judgment, and outcomes shall be appropriately documented.

## 8. Timelines and Mode of Disclosure

Material events or information shall be disclosed **as soon as reasonably possible and not later than twenty-four (24) hours** from the occurrence of the event.

Outcomes of Board meetings specified under Regulation 30 shall be disclosed within **thirty (30) minutes** of the conclusion of the meeting.

Disclosures shall be made to both **BSE Limited** and the **National Stock Exchange of India Limited**, in **XBRL or any other format prescribed by SEBI**, and simultaneously uploaded on the Company's investor-relations website, where they shall remain accessible for a minimum period of **five years** prior to archival.

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High-impact events may be accompanied by press releases or investor presentations, as appropriate. Periodic updates shall be provided until the event is resolved or closed. Where disclosure is delayed beyond twenty-four hours, the authorised officers shall provide a written explanation for such delay to the stock exchanges in accordance with Regulation 30(9) of SEBI LODR.

## 9. Record Retention

The Company Secretary shall retain working papers, correspondence, and supporting documentation for a minimum period of **eight years**, after which such records shall be archived in secure, access-controlled digital repositories with appropriate backup and encryption, in line with the Company's Archival Policy.

## 10. Policy Review

This Policy shall be reviewed **annually**, or earlier if required due to any regulatory amendment or issuance of a SEBI circular, by the Audit Committee to ensure continued alignment with applicable laws and best practices.

Any amendments shall become effective upon approval by the Board of Directors.

## 11. Effective Date

This Policy shall be effective from **1 April 2026** and shall supersede all earlier policies or procedures relating to disclosure of material events and information.

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