POLICY ON MATERIALITY OF EVENTS AND INFORMATION

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"), along with SEBI's interpretative circulars of **13 August 2021** and **14 July 2022** on continuous-disclosure obligations and Board responsibilities, imposes a duty on Monarch Surveyors and Engineering Consultants Limited ("Monarch" or "the Company") to make prompt, clear and complete public disclosure of all events or information that could reasonably influence investment decisions or the price of its securities. This Policy on Materiality of Events and Information ("the Policy") formalises the criteria and procedures Monarch adopts to determine materiality and to disseminate such information to the stock exchanges within stipulated timeframes.

Purpose

The Policy ensures that investors and other market participants have timely access to reliable, non-selective information, thereby safeguarding informed decision-making and protecting minority-shareholder interests. It clarifies quantitative and qualitative thresholds Monarch applies in judging materiality and sets out clear lines of responsibility, so regulatory deadlines are never compromised.

Scope

The Policy applies to Monarch and to each of its subsidiaries, joint ventures and associate entities, wherever located. Events or information pertaining to a subsidiary that **contributes significantly** to the Company's consolidated turnover, assets or profits as envisaged in SEBI's **May 2021** amendments shall be evaluated for disclosure in the same manner as events at the parent entity.

Definitions

An "event" or "information" is considered **material** if, in the opinion of the Board of Directors or the Key Managerial Personnel authorised under this Policy, its omission or misstatement **is likely to significantly influence the decision-making of investors in general** or result in a substantial market reaction. Qualitative triggers include, without limitation, regulatory actions; cancellation of significant tenders or licences; adverse court rulings; strategic shifts; **impact on strategic partnerships or investor relations**; **cyber-security incidents, major IT disruptions or data-privacy breaches**; or any development that fundamentally alters Monarch's risk profile.

Policy Statement

Monarch is committed to making full, fair and timely disclosures **in language that avoids ambiguity or selective interpretation**. Events categorically deemed material under Part A of Schedule III to SEBI LODR are disclosed without applying thresholds. Events under Part B are assessed using the benchmarks and qualitative factors set out in this Policy. Where doubt exists, the Company errs on the side of disclosure. Management shall not withhold or delay disclosure solely because Board ratification is pending.

Governance

The Board of Directors has approved this Policy and remains ultimately accountable for its effectiveness. The Board has authorised the Managing Director, the Chief Financial Officer and the Company Secretary, acting jointly or severally, to determine materiality and file disclosures. The Company Secretary (CS) maintains a log of all disclosures including rationale when an event is deemed non-material **and ensures archival of disclosures in accordance with SEBI's digital-preservation norms**. The Board may periodically review anonymised logs of non-material events to validate consistency of judgment. Draft announcements are vetted for accuracy and completeness before upload. The Audit Committee reviews compliance at each meeting and reports exceptions to the Board.

Criteria for Assessing Materiality

Authorised officers evaluate absolute monetary value; relative size; nature (isolated versus systemic); expected duration of impact on earnings/cash-flow; effect on creditworthiness, licence to operate, **strategic partnerships or investor relations**; analyst sensitivity; precedent disclosures; and inter-dependencies among events. Internal **checklists and decision matrices** support consistent judgement, and outcomes are documented.

Timelines and Mode of Disclosure

Material events are disclosed **as soon as reasonably possible and, in any case, not later than twenty-four (24) hours** from occurrence. Outcomes of Board meetings specified in Reg 30 are disclosed within thirty (30) minutes of meeting conclusion. Disclosures are filed on both the National Stock Exchange of India and BSE Limited portals **in XBRL or any other format mandated by SEBI**, and simultaneously posted on the Company's investor-relations website, where they remain accessible for at least five years before archival. High-impact events may be accompanied by press releases or investor presentations as appropriate. Updates are provided at regular intervals until the event is resolved or closed. **If disclosure is delayed beyond twenty-four hours, the authorised officers shall, together with the disclosure, provide an explanation for the delay to the stock exchanges** under Reg 30(9).

Record Retention

The CS retains working papers, e-mails and supporting materials for eight years, after which they are archived in secure, access-controlled digital repositories with back-up and encryption, consistent with the Archival Policy.

Policy Review

Given the evolving regulatory landscape, this Policy shall be reviewed **annually—or immediately upon any major SEBI circular or regulatory change—**by the Audit Committee to ensure continued alignment. Amendments become effective upon Board approval.

Effective Date

This Policy is effective from **April 1, 2025** and supersedes all earlier policies or procedures on disclosure of material events and information.