

Campus Activewear Limited	
POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION	
Version: 5.0	Effective Date: 17/08/2026

1. Legal Framework:

This Policy for Determination of Materiality of Events or Information is aimed at providing guidelines to the management of Campus Activewear Limited, to determine the materiality of events or information, which could affect investment decisions and ensure timely and adequate dissemination of information to the Stock Exchange(s) (as hereinafter defined).

This Policy has been formulated in accordance with the current guidelines laid down by Securities and Exchange Board of India under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with relevant circulars and Industry Standard Note issued by SEBI in this regard, as amended from time to time, with respect to disclosure of events and information.

Pursuant to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Board of Directors approved the “Policy for Determination of Materiality of Events or Information”. The Board shall review, and if found required, may amend this Policy from time to time.

2. Objectives:

The objective of this Policy is to serve as a guiding charter to the management to ensure that timely and adequate disclosure of events or information are made to the investor community by the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, to enable them to take well informed investment decisions with regard to the securities of the Company.

3. Introduction:

- (a) “**Act**” means the Companies Act, 2013 (and the Rules) and the Companies Act, 1956 to the extent applicable.
- (b) “**Board of Directors**” means the Board of Directors of Campus Activewear Limited .
- (c) “**Company**” means Campus Activewear Limited.
- (d) “**Key Managerial Personnel**” means key managerial personnel as defined under sub-section (51) of section 2 of the Companies Act, 2013.
- (e) “**Listing Regulations**” means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- (f) “**Policy**” means this policy, as amended from time to time.
- (g) “**SEBI**” means the Securities and Exchange Board of India.
- (h) “**Rules**” means the rules made under the Companies Act, 2013.
- (i) “**Stock Exchange(s)**” means the stock exchange on which the equity shares of the Company are listed.

4. Events which are deemed to be material event:

The Company shall disclose all such events which are specified in Para-A of Part-A of Schedule III of the Listing Regulations (as applicable from time to time) without any application of the guidelines for materiality as specified in sub-regulation (2) of Regulation 30 of the Listing Regulations.

5. Events which are dependent on application of guidelines for materiality:

The Company shall disclose all such material events, specified in Para B of Part-A of Schedule III of the Listing Regulations subject to application of guidelines for materiality.

Guidelines for determining materiality of events or information:

Quantitative criteria would mean:

The omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:

- a) two percent of turnover, as per the last audited consolidated financial statements of the Company;
- b) 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;
- c) 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;

Qualitative criteria would mean:

- 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;

In case where the Qualitative and Quantitative criteria specified above 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.

The Company shall, with respect to disclosures referred to in Regulation 30 of the Listing Regulations, make disclosures in compliance of the said regulation and the relevant circular(s) issued by SEBI read with the Industry Standards Note on Regulation 30 of the LODR Regulations, updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.

The KMP(s) of the Company shall 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), for determining the materiality of the said event or information and for making the necessary disclosures to the stock exchange(s).

6. Timeline for Disclosure to stock exchanges:

All events or information which are 'material' in terms of this Policy or the Listing Regulations shall be disclosed to stock exchanges as soon as reasonably possible and unless separate timelines are specified in the Listing Regulations as per the following criteria:

- 6.1. (a) within thirty minutes from the closure of the meeting of the Board in which the decision pertaining

to the event or information has been taken in case the meeting of the Board closes within Normal trading hours;

- (b) within three hours from the closure of the meeting of the Board in which the decision pertaining to the event or information has been taken in case the meeting of the Board 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.

In case the meeting of the Board 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.

‘Normal trading hours’ shall mean time period for which Stock Exchanges are open for trading for all investors.

- 6.2 twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the Company;
- 6.3 twenty-four hours from the occurrence of the event or information, in case the event or information is not emanating from within the Company.
- 6.4 within seventy-two hours of receipt of claims 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, if all the relevant information pertaining to such claims is maintained in the structured digital database of the Company in terms of provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

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

7. Any other information/ event which is to be disclosed by the Company:

The Company shall disclose major developments that are 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.

8. Guidelines on occurrence of an event/ information:

The occurrence of material event/information would be either by the Company’s own accord or not in the hands of the Company. It can be categorized as under:

- a) depends upon the stage of discussion, negotiation or approval; and
- b) in case of natural calamities, disruptions etc., it would depend upon the timing when the company became aware of the event/information.

In respect of the events under 8(a), the events/information can be said to have occurred upon receipt of approval of Board of Directors, e.g. further issue of capital by rights issuance and in certain events/information after receipt of approval of both i.e. Board of Directors and shareholders.

However, considering the price sensitivity involved, for certain events e.g. decision on declaration of dividends etc., disclosure shall be made on receipt of approval of the event by the Board of Directors, pending shareholder's approval.

In case in-principle approval or approval to explore (which is not final approval) is given by the Board of Directors, the same shall not require disclosure under regulation 30 of the LODR Regulations.

In respect of the events under 8(b), the events/information can be said to have occurred when the Company becomes aware of the events/information, or as soon as, an officer of the entity has, or ought to have reasonably come into possession of the information in the course of the performance of his duties. The term 'officer' shall have the same meaning as defined under the Act and shall also include Promoter of the Company.

9. Authority for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange:

The Board of Directors of the Company have severally authorized the following KMPs for the purpose of determining materiality of an event or information and for the purpose of making disclosures to Stock Exchange(s) ("**Authorized Person(s)**"):

Sl. No.	Name of the Key Managerial Personnel	Designation
1	Mr. Hari Krishan Agarwal	Chairman and Managing Director
2	Mr. Nikhil Aggarwal	Whole-time Director and CEO
3	Mr. Rakesh Thakur	Chief Financial Officer
4	Ms. Archana Maini	General Counsel and Company Secretary

Details of above KMPs shall also be disclosed to the Stock Exchange(s) and as well as on Company's website.

The Authorized Persons shall also disclose on the website of the Company all such events/information which have been disclosed to Stock Exchanges under the Policy, and such disclosures shall be hosted on the website for a period of five years and thereafter as per the Policy of the Company on preservation and retrieval of documents and records/archival policy.

The Authorized Persons shall provide specific and adequate reply to all queries raised by Stock Exchanges with respect to any event/information.

The details to be provided while disclosing a Material event/information shall be based on the requirements/guidance/principles laid down under the Listing Regulations or circulars issued thereunder from time to time.

10. 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.

11. Scope & Limitations

The Company shall disclose all events or information with respect to subsidiaries which are material for the Company.

In the event of any conflict between the provisions of this Policy and the Act or Listing Regulations or any other statutory enactments or rules, the provisions of Listing Regulations/ Act or 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. All other provisions of the Act or Listing Regulations or any other statutory enactments or rules, the provisions of Listing Regulations/ Act or statutory enactments, rules; which are not dealt with/ mentioned under this Policy shall also be applicable.

12. Dissemination of Policy

This Policy shall be hosted on the website of the Company.

Version History					
Version	Board Approval date	Brief description of major changes/revisions	Effective date	Author	Approver
1.0	30-05-2022	Adoption of the policy for determining the Materiality for Disclosure of Events and Information	30-05-2022	Archana Maini	Board of Directors
2.0	29-05-2023	Post resignation of Mr. Raman Chawla Chhabra, CFO, the names of the Key Managerial Personnel authorized for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange was updated.	01-06-2023	Archana Maini	Board of Directors
3.0	10-08-2023	Amendments were made in the Policy in terms of SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2023 including change in guidelines for determining materiality of events or information.	10-08-2023	Archana Maini	Board of Directors
4.0	02.02.2026	Amendments were made in the policy incorporating the Industry Standards guidelines issued by SEBI.	02.02.2026	Archana Maini	Board of Directors
5.0	17-08-2026	Post resignation of Mr. Sanjay Chhabra, CFO, the names of the Key Managerial Personnel authorized for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange was updated. and a schedule of version history was added.	17-08-2026	Archana Maini	Board of Directors
