ACTION CONSTRUCTION EQUIPMENT LIMITED

CIN:L74899HR1995PLC053860

Registered and Corporate Office: Dudhola Link Road, Dudhola, Distt. Palwal 121102, Haryana, India, Email: cs@ace-cranes.com , website: www.ace-cranes.com,

Phone: +91-1275-280103, Fax:+91-1275-280133

"POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS AND INFORMATION"

Last Updated on May 20, 2026

1. INTRODUCTION

In terms of Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time ("Listing Regulations"), Action Construction Equipment Limited ("the Company") is required to formulate a Policy for the determination of materiality of events/information.

This Policy for determination of materiality of events/information*, inter alia,* aims at:

- Ensuring that all investors have equal access to important information that may affect their investment decisions.
- Ensuring that adequate and timely information is provided to investors.
- Avoiding the establishment of a false market in the securities of the Company.
- Communicating the principles of materiality based on which the Company shall make disclosures of events/information.

2. DEFINITIONS/MEANING

(a) "**Act**" means the Companies Act, 2013 including the rules, schedules, clarifications, and guidelines issued by the Ministry of Corporate Affairs and any amendment thereto and/or modification thereof from time to time.

(b) "**Board**" refers to the Board of Directors of Action Construction Equipment Limited.

(c) "**Company**" or "**ACE**" refers to Action Construction Equipment Limited pursuant to this Policy, having its Registered Office at Dudhola link road, Dudhola palwal, Haryana 121102 India.

(d) "**Listing Regulations**" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendment thereto and/or modification thereof from time to time, and includes any circulars, guidelines, and directions issued thereunder or in relation thereto.

(e) **“Senior Management Personnel”** shall have the same meaning as prescribed under the Code of Conduct for Board Members and Senior Management Personnel.

(f) “**Subsidiary(s)**” shall mean subsidiaries of the Company as defined under the Act.

(g) “**Mainstream Media**” shall have the meaning prescribed to such term under the Listing Regulations read with related SEBI Circulars, Notifications, Guidance Note, and Industry Standards as recognized by the SEBI.

Words, terms, and expressions used herein, but not defined in this Policy, shall have the meaning as set out in the (i) Listing Regulations, (ii) Act, (iii) Securities and Exchange Board of India Act, 1992, and (iv) any other law applicable to the Company for the time being in force and/or as may be restated and/or modified from time to time.

3. POLICY AND PROCEDURES

I. MATERIALITY THRESHOLDS:

1. In terms of Regulation 30 of the Listing Regulations, the Company is required to make disclosures of any event/information which, in the opinion of the Board of the Company, is material.

2. Events specified in Para A of Part A of Schedule III are deemed to be material events and the Company is required to make disclosure of such events.

3. The Company is required to make disclosure of material events, including events specified in Para B of Part A of Schedule III, based on application of the guidelines for materiality as set out below or such other guidelines as may be prescribed under law:

a. the omission of an event/information, which is likely to result in discontinuity or alteration of event/information already available publicly; or

b. the omission of an event/information, which 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:

i. two percent of turnover, as per the last audited consolidated financial statements of the Company;

ii. 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;

iii. 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.

d. Where the criteria specified in sub-clauses (a) to (c) above are not applicable, any event or information may be considered material if, in the opinion of the Board of Directors or the Chairman & Managing Director, Whole Time Directors, Chief Financial Officer (CFO), and Company Secretary of the Company, such event or information is deemed to be material.

e. Following shall be the additional considerations in determining the materiality thresholds as stated above:

- Materiality to be assessed at the level of each individual disclosure requirement and, where relevant, on an aggregate basis; and
- Additional considerations to be taken into account by the Company when they are considered as plausible and objectively reasonable.

4. As specified in Para C of Part A of Schedule III of the Listing Regulations, the Company may promptly disclose any other information/event viz. major development that is likely to affect business.

5. The Company shall disclose to the Stock Exchanges all such event/information which are material in terms of the provisions of Regulation 30 of the Listing Regulations, within such a timeline as prescribed by the SEBI, in terms of the Listing Regulations.

6. The Company shall also disclose all event/information with respect to subsidiaries of the Company which are material for the Company as per the thresholds specified above.

7. The Company, shall confirm, deny, or clarify, any reported event/information in the Mainstream Media, which is not general in nature, and which indicates that rumour of an impending specific event or information is circulating amongst the investing public; provided such rumour results in a material price movement in the shares of the Company, determined in the manner prescribed under Regulation 30 of the Listing Regulations read with the related SEBI Circulars, Notifications, Guidance Note, and Industry Standards from time to time.

II. DISCLOSURE OF EVENT/INFORMATION:

1. The Managing Director, Whole Time Director and Company Secretary of the Company shall severally be responsible and authorised for ascertaining the materiality of event/information considering its nature and disclosure after taking into account various provisions of the Listing Regulations and this Policy.

2. The Senior Management Personnel of the Company shall forthwith inform all potential event/information as per Para A and Para B of Part A of Schedule III of the Listing Regulations, relating to the Company and/or the Subsidiaries (to the extent such information is material for the Company) any of the above mentioned authorized person.

3. The contact details of the persons authorised to determine materiality of events under this Policy are as follows:

Mr. Vijay Agarwal	Mr. Sorab Agarwal	Mr. Rajan Luthra	CS Anil Kumar
Chairman & Managing Director	Whole Time Director	Chief financial officer	Company Secretary & Compliance officer
Action Construction Equipment Limited			
Dudhola Link road, Dudhola, Palwal, Haryana 121102			
cs@ace-cranes.com	cs@ace-cranes.com	cs@ace-cranes.com	cs@ace-cranes.com
+91-1275-280103	+91-1275-280103	+91-1275-280103	+91-1275-280103

4. The above mentioned authorize person shall severally be responsible and authorised for dissemination of such events and information in accordance with the provisions of the Listing Regulations or any other law as may be applicable.

5. The disclosures made under Regulation 30 of the Listing Regulations and such other disclosures as may be required, shall be hosted on the website of the Company (www.ace-cranes.com) and simultaneously communicated to the Stock Exchanges in the permitted mode. All disclosures shall be available on the website of the Company.

4. AMENDMENTS TO THE POLICY

The Company is committed to continuously reviewing and updating its policies and procedures. Therefore, this Policy is subject to modification. The Board shall review this Policy as and when required, and in any event, at least once every three (3) years. This Policy and every subsequent modification, alteration or amendment made thereto, shall be promptly disclosed on the Company's website at www.ace-cranes.com In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

****