

THRIVE FUTURE HABITATS LIMITED

(Formerly Known as Ador Multiproducts Limited)

CIN: L85110DL1948PLC465696

www.thrivefuturehabitats.com



POLICY ON DETERMINATION AND DISCLOSURE OF MATERIALITY OF EVENTS AND INFORMATION AND WEB ARCHIVAL POLICY

(Revised on August 5, 2026)

**Pursuant to SEBI (Listing Obligations and Disclosure
Requirements) Regulations, 2015**

1. INTRODUCTION

Thrive Future Habitats Limited (Formerly Ador Multiproducts Limited) (the "**Company**") is committed to being open and transparent with all stakeholders and in disseminating information in a fair and timely manner. The Company comply with the continuous disclosure obligations imposed by the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 ('Listing Regulations') that came into effect from December 1, 2015 as amended from time to time. Listing Regulations mandate listed entities to formulate a policy for determining materiality of events or information that warrant disclosure to investors. It is in this context that the Policy on Determination and Disclosure of Materiality of Events and Information and Web Archival Policy is being framed and implemented.

2. BASIC GUIDELINES

This Policy had been formulated in accordance with the current guidelines laid down by Securities Exchange Board of India under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 ('Listing Regulations'), with respect to disclosure of material events and information.

Regulation 30(4) of the Listing Regulations requires every listed entity to frame a policy for determination of materiality of events and information that requires appropriate disclosure to the stock exchanges.

Further, Regulation 30(8) of the Listing Regulations requires the listed entity to host the aforesaid disclosures on its website for a minimum period of five years and thereafter in accordance with its Archival Policy.

Accordingly, Thrive Future Habitats Limited (Formerly Ador Multiproducts Limited) (the "Company") herein sets out a Policy for determination of materiality of events and information and disclosure thereof and Web Archival Policy.

Reference to statutory provisions or regulations shall be construed as meaning and including references to any amendment or re-enactment and any amendments to any statutory provisions or regulations or clarifications applicable to the Policy shall automatically be deemed to be included in the policy, without any further amendment of the policy by the Board or relevant committee of the Board of Directors.

3. OBJECT

The object of this Policy are as follows:

- a. To ensure that the Company complies with the disclosure obligations to which it is subject as a publicly-traded company as laid down by the Listing Regulations, various Securities Laws and any other legislations.
- b. To ensure that the information disclosed by the Company is timely and transparent.
- c. To ensure that corporate documents and public statements are accurate and do not contain any misrepresentation.
- d. To provide a framework that supports and fosters confidence in the quality and integrity of information released by the Company.
- e. To ensure uniformity in the Company's approach to disclosures, raise awareness and reduce the risk of selective disclosures.

4. DEFINITIONS AND INTERPRETATION

In this Policy, words and expressions shall have the meaning assigned to them below:

- a. **"Board of Directors"** shall mean all the members of the Board of Directors of the Company.
- b. **"Company"** shall mean Thrive Future Habitats Limited (Formerly Ador Multiproducts Limited).
- c. **"Policy"** shall mean this Policy on Determination and Disclosure of Materiality of Events and Information and Web Archival Policy.
- d. **"Net Worth"** shall have the meaning assigned to it in Section 2(57) of the Act.
- e. **"Turnover"** shall have the meaning assigned to it in Section 2(91) of the Act.

The terms used but not defined in this Policy shall have the same meaning as assigned to them under the Listing Regulations.

5. TYPES OF INFORMATION

The information covered by this Policy shall include "information related to the Company's business, operations, or performance which has a significant effect on securities investment decisions" (hereinafter referred to as "material information") that the Company is required to disclose in a timely and appropriate manner by applying the guidelines for assessing materiality.

6. MATERIALITY ASSESSMENT

Any information or event should be regarded as "material" if it meets the qualitative and/ or quantitative criteria for materiality set out in this Policy, or is deemed to be material under the Applicable Laws. Materiality will be determined on a case-to-case basis depending on specific facts and circumstances relating to the information/event, and Applicable Laws.

Events listed in Para A – Part A of Schedule III of Listing Regulations, shall be deemed to be material and shall be disclosed without application of materiality criteria.

Events/information listed in Para B – Part A of Schedule III of the Listing Regulations, shall be considered material if it satisfies the materiality criteria stated below:

I. Qualitative Criteria

- the omission of such event or information is likely to result in discontinuity or alteration of event or information already available publicly; or
- the omission of such event or information is likely to result in significant market reaction if the said omission came to light at a later date; or
- any other event/information may be treated as being material if in the opinion of the Board of directors of Company, the event / information is considered material.

II. Quantitative Criteria

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

- two percent of turnover, as per the last audited consolidated financial statements

- of the Company;
- 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;
- 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.

However, in certain instances, all of the three parameters specified above may not be relevant to an event. Applying the principle of *Reddendo Singula Singulis* (by assigning each one to each one) to the materiality provisions of Listing Regulations, it can be said that since there are separate thresholds of 2% of turnover, 2% of net worth and 5% of average PAT, each of such values can be applied individually and a particular threshold would be relevant and applicable depending on the nature of the event/ information being assessed. For instance, any event which has an impact on the turnover or profits of the Company can be considered material by comparing the value of such event/ information with 2% of the consolidated turnover or 5% of the average PAT respectively.

Accordingly, for every event / information the listed in Para B - Part A of Schedule III of the Listing Regulations, reference can be made to the ISF note or any other circular(s), FAQ(s) issued by SEBI or Stock Exchanges from time to time.

Notwithstanding anything stated above, the Board of Directors of the Company may prescribe any other criteria, from time to time, to determine materiality of events/information under this Policy. However, such criteria shall not dilute the requirements prescribed under the Listing Regulations.

7. GUIDANCE ON OCCURRENCE OF EVENT / AVAILABILITY OF INFORMATION

- 7.1. The timing of occurrence of an event and/or availability of information has to be decided on a case to case basis.
- 7.2. In case of natural calamities, disruptions etc. the events/ information can be said to have occurred when the Company becomes aware of the information.
- 7.3. In matters which would depend on the stage of discussion, negotiation or approval, the events/information can be said to have occurred upon receipt of approval by the Board of Directors or after receipt of approval of the Board of Directors and shareholders, as the case may be.
- 7.4. However, considering the price sensitivity involved, for certain events, disclosure shall be made on receipt of approval of the event by the Board of Directors, pending Shareholder's approval.

Sub-clause 7.1, 7.2, 7.3 and 7.4 as mentioned above, shall be subject to guidance provided by the Securities and Exchange Board of India vide its master circular no. HO/49/14/14(7)2025-CFD-POD2/1/3762/2026 dated January 30, 2026, as amended from time to time.

8. IMPLEMENTATION

- 8.1 To give effect to the requirements under the Listing Regulations, the Board has authorised the Managing Director and the Company Secretary, who shall determine the materiality of an event / information and disclose the same to the stock exchanges. Details of the above referred KMPs shall be also disclosed to the Stock Exchange(s) and as well as on

the Company's website.

- 8.2 The employees of the Company having access to, or becoming aware of the occurrence of, an event and/or information which are referred in Para 6 above shall report such event or information, as soon as possible, to the persons identified in Para 8.1 above so as to enable them to determine the materiality of an event / information and disclose the same to the stock exchanges within specified timeline.

9. DISCLOSURE

The Company shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions of the Listing Regulations.

The Company shall also make disclosure of events / information as may be specified by the Securities and Exchange Board of India from to time.

10. WEBSITE DISCLOSURES AND ARCHIVAL

The event / information disclosed to the stock exchanges under this Policy shall also be placed on the website of the Company for a minimum period of five years or for such other period, if the period prescribed shall be more than five years by the Listing Regulations and /or the Securities Laws as defined in the Listing Regulations.

After completion of the minimum period of five years or such other period as prescribed by the Listing Regulations and/or Securities Laws the events or information shall be archived by the Company for a further period of one years. Thereafter, such events or information may ceased to be displayed on the website of the Company.

11. AMENDMENT

Any subsequent amendment / modification in the Listing Regulations or any other governing Act / Rules / regulations or re-enactment, impacting the provisions of this Policy, shall automatically apply to this Policy and the relevant provision(s) of this Policy shall be deemed to be modified and / or amended to that extent, even if not incorporated in this Policy.

The Board may review and amend this Policy from time to time, as may be deemed necessary.

12. EFFECTIVE DATE

This policy shall be effective from date of adopting the said policy by the Board.

13. DISSEMINATION OF THE POLICY

The policy will be hosted on the Company's website.