

**POLICY FOR DETERMINATION OF
MATERIALITY OF EVENTS AND
INFORMATION FOR DISCLOSURE TO THE
STOCK EXCHANGE**

**(Last updated on 27.05.2026 and approved by
the Board of Director of the Company
in their meeting held on 27.05.2026)**

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1. Introduction

In accordance with Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”) or (“Listing Regulation”), requires every listed entity has to frame a policy for determining the materiality of events and information. Based on the application of this policy, the Company is obligated to disclose specified information or events to the Stock Exchanges.

Accordingly, this Policy for Determination of Materiality of Events and Information for Disclosure to Stock Exchanges has been formulated in compliance with Regulation 30 of the LODR Regulations.

Unless otherwise defined in this Policy, all words, terms, and expressions used herein shall have the same meaning as assigned under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

This Policy is intended to serve as a guiding framework for the Board of Directors, Key Managerial Personnel (KMPs), and all relevant officers of the Company in assessing and determining materiality for disclosure purposes.

2. Adoption Date

This Policy was approved by the Board of Directors on December 23, 2015 and subsequently amended on May 27, 2026.

3. Guidelines for Determination of Materiality

Information or an event shall be considered material if its omission or misstatement could influence the decisions of users relying on the Company’s disclosures. The determination of materiality shall be made on a case-by-case basis, depending on the specific facts and circumstances surrounding the event or information. Materiality assessment is primarily driven by qualitative considerations, although quantitative factors may also be relevant where applicable.

An event or information shall be treated as material if it satisfies any of the following criteria:

- a) the event or information constitutes unpublished price sensitive information (“UPSI”) in any manner;
- b) the omission of such event or information is likely to result in discontinuity or alteration of information already available in the public domain;
- c) the omission of such event or information is likely to cause significant market reaction if subsequently disclosed; or
- d) any other event or information which, in the opinion of the Board of Directors of the Company, is considered material.

4. Policy

Materiality has to be determined on a case to case basis depending on specific facts and circumstances relating to the information/event. In order to determine whether a particular event/information is material in nature, the Company shall consider the criteria(s) mentioned below:

- 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; 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. If in the opinion of the Board of Directors, the event / information is considered material.

The events / information specified under Para A of Part A of Schedule III of the Listing Regulations are deemed material events and shall be disclosed to the Stock Exchange(s) within the timelines specified therein, without application of the materiality guidelines.

5. Implementation

To give effect to the requirements under the Listing Regulations, the Board has authorised Chief Financial Officer and Company Secretary, either singly or severally, to determine whether an event or information is material and disclose the same to the stock exchanges, based on the categories of information specified above.

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

6. Website Updation and Archival

All disclosures made under this Policy shall be uploaded/hosted on the Company's website and shall remain available there for a minimum period of five (5) years. Thereafter, such disclosures may be archived in accordance with the Company's applicable archival process/policy.

7. Review of the Policy

This Policy shall be reviewed as and when necessary to ensure compliance with any statutory amendments or regulatory changes.

In accordance with Regulation 30(5) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the contact details of the persons authorized for determining the materiality of any event or information are as follows:

Sr. No.	Name	Designation	Email ID	Tel No.
1	Mr. Sanjay Lal Gupta	Company Secretary	info@kaushalya.net	033-2335-3030