

D S KULKARNI DEVELOPERS LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

1. PREFACE:

The Policy for Determination of Materiality of Events or Information (the “**Policy**”) has been framed in accordance with Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) to determine materiality of events or information based on the criteria specified under Regulation 30 of the Listing Regulations and to ensure that the Company shall make disclosure of such events or information to the Stock Exchanges in a timely manner.

2. DEFINITIONS:

- a) “**Act**” means the Companies Act, 2013.
- b) “**Board**” means the Board of Directors of the Company.
- c) “**Company**” means “D S Kulkarni Developers Limited”
- d) “**Stock Exchange**” means BSE Limited, and NSE Limited where shares of the Company are listed.

3. DISCLOSURE OF MATERIAL EVENTS OR INFORMATION:

The events or information to be disclosed to the Stock Exchanges are broadly divided in following categories:

- a. The events or information as specified in Para A of Part A of Schedule III of the Listing Regulations are deemed to be material events or information and the Company shall make disclosure of such events to the Stock Exchanges.
- b. The Company shall make disclosure of events or information as specified in Para B of Part A of Schedule III of the Listing Regulations to the Stock Exchange, based on application of the guidelines for materiality, as specified hereinafter.

The Company shall consider the following criteria for determination of materiality of events/ information:

- 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;
 - c) In case where the criteria specified in sub-clauses (a) and (b) are not applicable, an event/information may be treated as being material if it is determined to be so in the opinion of the Board of Directors of the Company (or the key managerial personnel of the Company authorised for the purpose of determining materiality).
- c. Any other information/event viz. major development that is 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.
- d. Without prejudice to the generality of clauses (a), (b) and (c) above, the Company may make disclosures of event/information as specified by the Securities and Exchange Board of India from time to time.

4. AUTHORITY FOR DETERMINING MATERIALITY OF AN EVENT OR INFORMATION:

The following key managerial personnel of the Company are authorized by the Board for the purpose of determining materiality of an event or information and for the purpose of making disclosures to the Stock Exchanges:

- a) Chief Financial Officer; and
- b) Company Secretary.

The contact details of above mentioned key managerial personnel shall be disclosed to the stock exchanges as well as on the Company website.

5. GENERAL:

- a. Subject to applicable law, the Company shall disclose to stock exchanges all events or information as specified in this policy as soon as reasonably possible and not later than twenty-four hours from the occurrence of event or information. In case the disclosure is made after twenty-four hours of occurrence of the event or information, the Company shall, along with such disclosures provide explanation for delay.
However, disclosure with respect to events specified in sub-para 4 of Para A of Part A of Schedule III of the Listing Regulations shall be made within thirty minutes of the conclusion of the Board meeting.

- b. The Company shall, with respect to disclosures referred to in this Policy, make disclosures to the Stock Exchanges updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.
- c. The Company shall disclose all events or information with respect to subsidiaries which are material for the Company.
- d. The Company shall disclose on its website all such events or information which has been disclosed to Stock Exchanges under this Policy, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website.
- e. The Company shall provide specific and adequate reply to all queries raised by Stock Exchange(s) with respect to any event or information. The Company may on its own initiative also, confirm or deny any reported event or information to the Stock Exchange(s).
- f. The Policy shall be disclosed on the website of the Company.

6. SCOPE LIMITATION:

In case any provision(s) of this Policy is contrary to or inconsistent with the provision(s) of Listing Regulations or other applicable laws, the provision(s) of Listing Regulations or other applicable laws shall prevail.

7. AMENDMENT:

The Board of the Company may amend / modify / revise / update this this Policy in whole or in part, at any time, subject to any subsequent modification(s)/ amendment(s) to Listing Regulations or other applicable laws, if any.
