

Policy for Determination of Materiality for Disclosure of Information/Events to the Stock Exchanges

1. Preamble

This Policy provides an overall framework for disclosure of information or events of the Company pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”). This Policy is subject to the Board’s review and changes, as may be appropriate, in conformity with the requirements of the SEBI LODR Regulations, as amended from time to time.

2. Objective

The objective of this Policy is to facilitate timely and adequate disclosure of material information or events which are unpublished and price sensitive, have a bearing on performance or operations of the Company or may result in a significant market reaction in the price of securities of the Company if the omission comes to light at a later date.

3. Definitions

- a) “Board” or “Board of Directors” means the collective body of the Directors of the Company as constituted from time to time;
- b) “Company” shall mean Kartik Investments Trust Limited;
- c) “Material Event/s” means those event/s specified in:
 - (i) Para A of Part A of Schedule III of the SEBI LODR Regulations, being deemed material events, which the Company shall compulsorily disclose to the extent applicable;
 - (ii) events specified in Para B of Part A of Schedule III of the SEBI LODR Regulations, which the Company shall disclose, based on guidelines for materiality as specified in 4 herein to the extent applicable;
 - (iii) events specified in Para C of Part A of Schedule III of the SEBI LODR Regulations to the extent applicable;
 - (iv) events specified in Part B of the SEBI LODR Regulations to the extent applicable;
 - (v) any event which may have a material effect on the Company;
- g) “Policy” means this Policy for Determination of Materiality for Disclosure of Information/Events to the Stock Exchanges;
- h) “SEBI” means the Securities and Exchange Board of India;
- j) “Securities” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956, as amended from time to time;
- k) “Stock Exchange” means BSE Limited;

4. Criteria for determining the materiality and disclosure

The following criteria shall be considered by the Company while determining the materiality of events/information and disclosure to stock exchange:

- i. whether the omission of an event or information, is likely to result in discontinuity or alteration of event or information already available publicly; or
- ii. whether 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
- iii. whether the event/information is likely to have a bearing on performance or operation of the Company or have a material impact on the business or the Company; or

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iv. in cases where the criteria specified in sub-clauses (i) to (v) above are not applicable, whether an event/information may be treated as being material in the opinion of the Board.

The Chief Financial Officer (CFO) of the Company is authorized to determine the materiality of an event or information under this Policy and the SEBI LODR Regulations and to make disclosures to the Stock Exchange under the SEBI LODR Regulations.

All questions about this Policy should be directed to the CFO/ Company Secretary.

6. Dissemination of the Policy:

A copy of the Policy shall be put up on the website of the Company.

7. Review of the Policy: The Policy shall be subject to review of the Board from time to time.