

POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

Background:

As per Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as SEBI Listing Regulations), a listed entity is required to frame a policy for determination of materiality for disclosure of events or information to Stock Exchanges, based on the criteria specified in Regulation 30 of the said Regulations and the same is also required to be disclosed on the Company's website.

Policy:

Taking into account the aforesaid and other applicable legal provisions, the Policy on determination of materiality for disclosures of events or information is being made as under:

1. The Company shall consider the following criteria for determination of materiality of an event or information:

(a) The event or information is in any manner unpublished price sensitive information or the omission of an event or information is likely to result in alteration of information already available publicly; or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) where the criteria specified in sub-clauses (a) and (b) are not applicable, an event/information may be treated as being material, if in the opinion of the Executive Director of the Company, the event / information is considered material.

2. The Key Managerial Personnel are the authorized persons for the purpose of determining and for making disclosures of such material event or information to the stock exchanges.

Contact details: Mr. Onkar Shetye, Aurum PropTech Limited, Aurum Q1, Aurum Q Parc, Thane Belapur Road, Ghansoli, Navi Mumbai Thane MH 400710 IN; Email: onkar.shetye@aurumproptech.in, [*sonia.jain@aurumproptech.in](mailto:sonia.jain@aurumproptech.in); Phone: 022 3000 1700

A single point of contact of the KMP's about the policy and disclosures made by the Company should be referred to the Company Secretary and Compliance Officer of the Company the contact details are as follows;

*Sonia Jain
Company Secretary &
Compliance Officer
Aurum PropTech Limited
sonia.jain@aurumproptech.in
+91-22-3000 1700

*Registered Office: Aurum Q1, Aurum Q Parc, Thane Belapur Road, Ghansoli, Navi Mumbai Thane MH 400710 India.

3. DISCLOSURES OF EVENTS OR INFORMATION

- a. Events specified in Schedule III PART a PARA A of SEBI (LODR), 2015 are deemed to be material events and the Company shall make disclosure to of such events or information as soon as reasonably possible and not later than twenty-four (24) hours from the occurrence of such event or information in the following manner: i. inform the stock exchanges in which the securities of the Company are listed; ii. upload on the corporate website of the Company.
- b. The Company shall make disclosure of events as specified in Annexure B based on application of guidelines for determining Materiality as per Clause F of the Policy.
- c. The Company shall make disclosures updating Material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.
- d. The Company shall disclose all events or information with respect to its Material Subsidiaries.
- e. The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information and on its own initiative.
Further it shall confirm or deny any event or information to stock exchange(s) reported in the media.
- f. In case where an event occurs or information is available with the Company, which has not been indicated in PARA A or PARA B, but which may have material effect on it, the Company will make adequate disclosures in regard thereof.

4. This Policy is subject to review from time to time and the Board of Directors is authorized to make appropriate changes to the above policy as he may deem expedient.



5. SCOPE AND LIMITATION:

In the event of any conflict between the provisions of this Policy and the SEBI LODR, 2015; Companies Act, 2013; SEBI Regulations or any other statutory enactments, rules, the provisions of such SEBI LODR, 2015 / Companies Act, 2013 or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

6. DISSEMINATION OF POLICY: This Policy shall be hosted on the website of the Company .

* Reviewed & amended by Board of Directors on April 27, 2023.