

PURAVANKARA LIMITED

(formerly Puravankara Projects Limited)

POLICY FOR DETERMINING MATERIALITY FOR DISCLOSURES OF INFORMATION

QMS/PPL/15	Date: 12.02.2016	REV. NO. 00
Prepared By	Company Secretary Department	
Reviewed BY	Dy. Chief Financial Officer	
Approved by	Board of Directors	
Issued by	Head Planning & Process / Management Representative	
Process Owner	Company Secretary Department	

Approved by with date :	Board of Directors	12.02.2016
Issued by with date:	QMS Team	Page 1 of 7

AMENDMENT SHEET

DATE	CHANGE DESCRIPTION	REF	PG.NO.	NEXT ISSUE/REV.NO.

Approved by with date :	Board of Directors	12.02.2016
Issued by with date:	QMS Team	Page 2 of 7

POLICY FOR DETERMINING MATERIALITY FOR DISCLOSURES OF INFORMATION**Background:**

As per Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, every listed entity shall make disclosures of any events or information which, in the opinion of the board of directors of the listed company, is material. The Listed entity shall frame a policy for determination of materiality, based on the criteria specified in the Regulations.

Scope and Applicability of the Policy :

This Disclosure Policy is applicable to all disclosures and communication of Material Events or Information by the Company, which in the opinion of the Board of Directors of the Company, is material.

The Disclosure shall be made considering the below:

1. Events specified in Annexure A are deemed to be material events and Company shall make disclosure of such events.
2. Events specified in Annexure B shall require disclosure based on criteria for determining materiality of events or information.
3. Events specified in Annexure C shall require disclosure of any event or information viz major development that is likely to affect business

Criteria For Determining Materiality Of Events Or Information:

The following criteria are to be considered for determining materiality of events or information.

1. Omission of an event or information which is likely to result in discontinuity or alteration of event or information already available publicly.
2. 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.
3. In case where the criteria specified above are not applicable an event/information may be treated as being material if in the opinion of the Board of Directors of the Company, the event/information is considered material.

Approved by with date :	Board of Directors	12.02.2016
Issued by with date:	QMS Team	Page 3 of 7

Authorised Persons:

The Managing Director/Joint Managing Director/Chief Financial Officer (Authorised Persons) of the Company are authorised on behalf of the Company for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) under these regulations.

On determination of materiality of information and on instructions by Authorised Persons, the Key Managerial Personnels of the Company are severally authorised to disclose the information to the Stock Exchanges.

Amendments:

The Company may review and revise the Policy from time to time.

Approved by with date :	Board of Directors	12.02.2016
Issued by with date:	QMS Team	Page 4 of 7

Annexure A**List of Events which shall be disclosed without any application of the guidelines for materiality**

SI.No	Events requiring Disclosure
1.	Acquisition (s) including agreement to acquire, Scheme of Arrangement (amalgamation/merger/demerger/restructuring) or sale or disposal of any unit(s), division or subsidiary of the listed entity or any other restructuring. Explanation : For the purpose of this sub para, the word “acquisition” shall mean i. Acquiring control, whether directly or indirectly, or ii. Acquiring or agreeing to acquire shares or voting rights in, a company, whether directly or indirectly, such that – a. The Company holds shares or voting rights aggregating to five percent or more of the shares or voting rights in the said company or b. There has been a change in holding from the last disclosure made under sub- clause (a) of clause (ii) of the Explanation to this sub-
2.	Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of
3.	Revision in Rating(s)
4.	Outcome of meetings of the Board of Directors. Company shall disclose to the Stock Exchanges within 30 minutes of the closure of the meeting held to consider the following: a. Dividends and/or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched. b. Any cancellation of dividend with reasons thereof c. The decision on buy back of securities d. The decision with respect to fund raising proposed to be undertaken e. Increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched f. Reissue of forfeited shares or securities or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to g. Short particulars of any other alterations of capital, including calls
5.	Agreements (viz shareholder agreements) joint venture agreements, family settlement agreements (to the extent that it impacts management and control of the listed entity), agreements/treaties/contracts with media companies which are binding and not in normal
6.	Fraud/defaults by promoter or KMP or by the Company or arrest of KMP or Promoter
7.	Change in directors, KMP (Managing Director, Joint Managing Director, CEO, CFO, CS,
8.	Appointment or discontinuation of a share transfer agent
9.	Corporate debt restructuring
10.	One time settlement with a bank

Approved by with date :	Board of Directors	12.02.2016
Issued by with date:	QMS Team	Page 5 of 7

ARCHIVAL POLICY	QMS/PPL/15 REV.NO.00
------------------------	---------------------------------

11.	Reference to BIFR and winding up petition filed by any party/creditors
12.	Issuance of notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the
13.	Proceedings of Annual and Extraordinary general meetings of the Company
14.	Amendments to Memorandum and Articles of Association of the Company, in brief
15.	Schedule of Analyst or Institutional Investor and presentation of financial results made by the

Annexure B

List of Events which shall be disclosed upon application of the guidelines for materiality

SI.No	Events requiring Disclosure
1.	Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2.	Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing or marketing tie-up, adoption of new lines of business
3.	Capacity addition to product launch
4.	Awarding, bagging, receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business
5.	Agreements (viz loan agreement(s) (as a borrower) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or
6.	Disruption of operations of any one or more units or division of the Company due to natural calamity, force majeure or events such as strikes, lockouts, etc.
7.	Effect(s) arising out of change in the regulatory framework applicable to the Company
8.	Litigation(s)/dispute/regulatory actions with impact
9.	Fraud/defaults etc. by Directors (other than Key Managerial personnel) or employees of the Company
10.	Options to purchase securities including any ESOP/ESPS Scheme
11.	Giving guarantees or indemnity or becoming a surety for any third party
12.	Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals

Approved by with date :	Board of Directors	12.02.2016
Issued by with date:	QMS Team	Page 6 of 7

Annexure C

Any other information/event viz major development that is likely to affect business, eg. 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.

Without prejudice to generality of Annexure A, Annexure B and Annexure C, the Company may make disclosures of event/information as specified by SEBI from time to time.

Approved by with date :	Board of Directors	12.02.2016
Issued by with date:	QMS Team	Page 7 of 7