KAKA INDUSTRIES LIMITED

Policy for Determination of Materiality of Events or Information

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

BACKGROUND

With a view to enable investors to make well informed decisions, Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 *("Listing Regulation")* requires every listed entity to make timely, adequate and accurate disclosure of any event or information which, in the opinion of its Board of Directors *("Board")* is material. Further, the sub-regulation 4 of listing regulation also provides for framing a policy for Determination of Materiality of events or information, based on the criteria specified therein.

Hence in view of the above, this Policy for Determination of Materiality of events or information *("Policy")* has been framed to provide necessary guidelines to the Board for determination of the materiality of events and information and to make timely, adequate and accurate disclosures of information or events which could affect the investment decisions of the investors

This Policy has been formulated in accordance with Clause (ii) of sub-regulation (4) of Regulation 30 of the Listing Regulations.

MATERIAL DISCLOSURES

The Company shall within the prescribed time disclose all such material events to the Stock Exchanges where **the Securities of the Company are listed as:**

a. Specified in Para A of Part A of Schedule III of the Listing Regulations without any application of guidelines for materiality as specified in sub regulation (4) of Regulation 30 of Listing Regulations;

b. Specified in Para B of Part A of Schedule III of the Listing Regulations subject to application of guidelines for materiality as specified in sub regulation (4) of Regulation 30 of Listing Regulations based on the following quantitative criteria:

   i. Quantitative Criteria: An event or information whose value or expected impact in terms of value exceeds the lower of:

      - 2% (two percent) of turnover, as per the last audited consolidated financial statements of the Company;
      - 2% (two percent) of net worth, as per the last audited consolidated financial statements of the Company (except in case the arithmetic value is negative); or;
      - 5% (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.

   ii. Qualitative Criteria: The omission of an event or information which is likely to result in discontinuity or alteration of event or information already available publicly, or is likely to result in significant market reaction if the said omission came to light at a later date.

   iii. Board Determination: In cases where the criteria specified in sub-clauses (i) and (ii) are not applicable, an event or information may treated as material if, in the opinion of the Board of Directors of the Company, the event or information is considered material;

c. Any other events or information, viz. any 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 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; and

d. any other information as may be determined by the Board from time to time.

PRESCRIBED TIMELINES FOR DISCLOSURE

In accordance with Regulation 30(6) read with the Master Circular and applicable amendments under the Listing Regulations, the Company shall make disclosures to the Stock Exchange(s) within the following timelines:

1. Outcome of Meetings of the Board of Directors: Disclosures with respect to events specified in Sub-para 4 of Para A of Part A of Schedule III (including financial results, dividends, buyback, fund raising, bonus issue, etc.) shall be made within the following timelines upon closure of the meeting: o

2. Within 30 (thirty) minutes from the closure of the meeting of the Board of Directors, where the meeting concludes during normal trading hours or within 3 hours prior to the commencement of normal trading hours. o

3. Within 3 (three) hours from the closure of the meeting of the Board of Directors, where the meeting concludes after normal trading hours but more than 3 hours prior to the commencement of the next normal trading hours. o

In case of board meetings held over multiple days, disclosures pertaining to the outcomes considered on a specific day shall be made within 30 minutes / 3 hours (as applicable) of the closure of the meeting for that day.

GUIDELINES FOR DETERMINING WHEN THE MATERIAL EVENT/ INFORMATION HAS OCCURRED

The determination of the time when material event/information can be said to have occurred would depend either upon the stage of negotiation/discussion or approval and the events where no such negotiation/ discussion or approval is required, the event/information can be said to have occurred as and when the management become aware of the same.

AUTHORISED KEY MANAGERIAL PERSONNEL (KMP) FOR DETERMINING THE MATERIALITY

The following KMP's are hereby jointly and/or severally authorised by the Board of Directors for determining materiality of an event or information for the purpose of making disclosures to the Stock Exchanges:

<table>
<tr><th>Name</th><th>Designation</th><th>Email Id & Contact Details</th></tr>
<tr><td>Rajesh Dhirubhai Gondaliya</td><td>Chairman & Managing Director
(DIN: 03454540)</td><td rowspan="4">investors@kakaprofile.com
8000446524</td></tr>
<tr><td>Bhavin Rajeshbhai Gondaliya</td><td>Wholetime Director
(DIN: 07965097)</td></tr>
<tr><td>Nishi Shah</td><td>Company Secretary & Compliance Officer</td></tr>
<tr><td>Chintan Bodar</td><td>CFO</td></tr>
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DISCLOSURES

a. The Chairman & Managing Director, Executive Director and Company Secretary of the Company are authorised for ascertaining the materiality of events/ information considering its nature and to disclose it to the Stock Exchanges after taking into consideration various provisions of Listing Regulation and this Policy.

b. The Company shall use the electronic facilities provided by the Stock Exchanges for dissemination of the said event/ information.

c. Statutory timeframes for disclosure shall be adhered to delay, if any, should be sufficiently explained along with the disclosure.

AMENDMENT

Any change in the Policy shall be approved by the Board of the Company. The Board shall have the right to withdraw and/ or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

In case any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed thereunder and Listing Regulations ("Statutory Provisions"), the provisions of Statutory Provisions shall prevail.

DISSEMINATION OF THE POLICY

The policy shall be hosted on the website of the Company i.e. https://kakaprofile.com/

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Effective Date: 17/03/2023

Date of Approval by Board of Directors: 17/03/2023 & 11/12/2024 & 15/05/2025