

# **PRUDENT CORPORATE ADVISORY SERVICES LIMITED**

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## **DETERMINATION OF MATERIALITY OF EVENT(S)/ INFORMATION POLICY**

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1. **INTRODUCTION**

- Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) requires every listed company to formulate and put in place a policy on determination of materiality of events / information.
- In compliance of the above Regulations, the Board of Prudent Corporate Advisory Services Limited (“**Company**”) has adopted the following policy on determination of materiality of events / information (“**Policy**”).
- In case of any conflict between the provisions of this Policy and provisions of any applicable law, the provisions of applicable law shall prevail over this Policy. Any subsequent amendment/ modification in the provisions of applicable law shall automatically apply to this Policy.

2. **EFFECTIVE DATE**

The Policy shall come into force with effect from the date of listing of the equity shares of Prudent Corporate Advisory Services Limited (the “Company”) on BSE Limited and National Stock Exchange of India Limited.

3. **APPLICABILITY**

This Policy applies to:

- Events specified in Para A of Part A of Schedule III of the Listing Regulations;
- Events specified in Para B of Part A of Schedule III based on the application of guidelines of materiality specified in this Policy; and
- Events in the opinion of the Board of the Company which satisfy the materiality criteria, and are not covered in aforesaid para A and para B.

4. **OBJECTIVE**

This Policy has been framed with the objective of providing adequate and appropriate disclosures that are consistent with the facts of the material events. The current Policy mechanisms provides for:

- a. the procedure determining the materiality of the events/information,
- b. the procedure governing the disclosure of the events that are deemed to be material;
- c. the time frame within which such information is to be disclosed.

5. **DEFINITIONS**

- “**Board**” means the board of directors of the Company.
- “**Compliance Officer**” means the Company Secretary of the Company.
- “**Schedule III**” means Schedule III of the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Regulations or any other relevant regulation/legislation applicable to the Company.

6. **DISCLOSURE OF MATERIAL EVENTS**

- a. Company shall make disclosure of any event or information, which is material in nature, to the stock exchange.
- b. Events / Information specified in Paragraph A of Part A of Schedule III of the Listing Regulations are deemed to be material events and Company shall make disclosure of such events.
- c. Events / Information specified in Paragraph B of Part A of Schedule III of the Listing Regulations or any other events or information, shall be treated as material based on application of the guidelines for materiality, as specified hereinafter.

7. **GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION**

An event or information shall be considered material if:

- a. it is deemed to be material under applicable laws and regulations; or
- b. omission of, the event, or information, is likely to result in discontinuity or alteration of event or information already available publicly; or
- c. omission of, the event, or information, is likely to result in significant market reaction if the said omission came to light at a later date; or
- d. if in the opinion of the Board, the event or information is considered material.

8. **AUTHORITY FOR DETERMINING MATERIALITY OF AN EVENT OR AN INFORMATION**

The authority for determining materiality of an information/event lies with the majority of the following members:

Authorised Persons’ Designation	Email ID	Contact No.:
Managing Director	cs@prudentcorporate.com	+91-79 4020 9600
Chief Financial Officer		
Company Secretary		

Based on the decision of the above-named officials, the Compliance Officer shall be responsible for making disclosure to the stock exchange. The contact details of the Compliance Officer shall be made available on the website of the Company.

**9. CONTINUAL DISCLOSURE OBLIGATIONS**

- a. The Company shall first disclose to stock exchange(s) all events specified in Paragraph A of Part A of Schedule III of the Listing Regulations as soon as reasonably possible and not later than 24 (twenty-four) hours from the occurrence of event or information.
- b. The disclosure with respect to events specified in Point 4 of Paragraph A of Part A of Schedule III of the Listing Regulations shall be made within the timelines specified therein.
- c. The Company shall, with respect to events/information mentioned in Paragraph A and B of Part A of Schedule III of the Listing Regulations, make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.
- d. The Company shall make disclosures of events/information as specified in Paragraph B of Part A of Schedule III of the Listing Regulations based on application of guidelines for determining materiality as per Clause 7 of this Policy.
- e. The Company shall disclose all events or information with respect to subsidiaries which are material for the Company.
- f. All the above disclosures will be hosted on the website of the Company for a minimum period of 5 (five years) and thereafter archived in accordance with the Company's policy.

**10. AMENDMENTS**

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

**11. PUBLICATION OF THE POLICY**

This policy shall also be posted on the website of the Company [www.prudencorporate.com](http://www.prudencorporate.com).

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