



# **KAYCEE INDUSTRIES LIMITED**

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CIN: L70102MH1942PLC006482

## **POLICY ON DISCLOSURE OF MATERIAL EVENTS OR INFORMATION**

**Revised policy approved on November 04, 2024**

## **POLICY FOR DETERMINING MATERIALITY FOR DISCLOSURES OF KAYCEE INDUSTRIES LIMITED**

### **A. INTRODUCTION**

Equity shares of Kaycee Industries Limited (the “**Company**” or “**Kaycee**”) are traded in India in the BSE Limited.

The requirements under the Regulation 30 and other applicable regulations (if any) under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, (“**Listing Regulations**”), and other relevant rules and statutes including circulars, clarifications, guidelines or other relevant regulatory guidance (by whatever name called) (hereinafter referred to as the “**Applicable Laws**”) have been considered while drafting this Policy for determining Materiality for Disclosures (the “**Policy**”).

The Policy applies in respect of disclosure of material events in relation to the Company, its Subsidiaries, Directors, Promoters, Key Managerial Personnel, Senior Management Personnel as required under Applicable Laws.

### **B. AUTHORISED PERSONS**

The Board will authorize one or more Key Managerial Personnel for the purpose of determining Materiality of an event or information and for the purpose of making disclosures to the Stock Exchanges.

The Key Managerial Personnel, authorized for the purpose, will be responsible for administering this Policy, determining the materiality of events or information in relation to the Company and monitoring compliance by the Company with disclosure obligations applicable to it.

The contact details of the Key Managerial Personnel, so authorized, will be disclosed to the Stock Exchanges and will be placed on the website of the Company.

### **C. MATERIALITY ASSESSMENT**

1. Any information or event, whether positive or negative, should be regarded as “material” if it meets the qualitative and/ or quantitative criteria for materiality set out in this Policy, or is deemed to be material under the Applicable Laws. Materiality will be determined on a case-to-case basis depending on specific facts and circumstances relating to the information/event, and Applicable Law.
2. Events listed in Para A – Part A of Schedule III of Listing Regulations, shall be deemed to be material and shall be disclosed without application of materiality criteria.
3. Events/information listed in Para B – Part A of Schedule III of the Listing Regulations, shall be considered material if it satisfies the materiality criteria stated below:

## **I. Qualitative Criteria**

- (a) the omission of such event or information is likely to result in discontinuity or alteration of event or information already available publicly; or
- (b) the omission of such event or information is likely to result in significant market reaction if the said omission came to light at a later date; or

## **II. Quantitative Criteria**

If the value or the expected impact in terms of value of such event or information exceeds the lower of the following:

- (a) two percent of turnover, as per the Company's last audited annual consolidated financial statements;
  - (b) two percent of net worth, as per the Company's last audited annual consolidated financial statements, except in case the arithmetic value of the net worth is negative;
  - (c) five percent of the average of absolute value of profit or loss after tax, as per the Company's last three audited annual consolidated financial statements.
4. To determine the materiality of other events/information which are not covered under 2 or 3 above, relevant qualitative and quantitative criteria, as determined by the Board of Directors of the Company, shall be considered.
  5. Notwithstanding anything stated above, the Board of Directors of the Company may prescribe any other criteria, from time to time, to determine materiality of events/information under this Policy. However, such criteria shall not dilute the requirements prescribed under the Listing Regulations.

## **D. TIMELINES FOR DISCLOSURE**

The Company shall disclose all events or information within the timelines specified in the Applicable Laws.

## **E. DISCLOSURE OF THE POLICY**

This Policy will be uploaded on the website of the Company.

## **F. EVENTS/INFORMATION WITH RESPECT TO SUBSIDIARIES**

The Company shall disclose all events or information with respect to Subsidiaries as are required under Applicable Laws.

## **G. LIMITATION AND AMENDMENT**

In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this Policy.

Any subsequent amendment / modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.

This policy shall be periodically reviewed and updated.