

LAKE SHORE REALTY LIMITED
CIN: L68100DL1987PLC350285

**POLICY FOR DETERMINATION OF
MATERIALITY OF EVENTS**

I INTRODUCTION

Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), as amended from time to time, requires every listed company, whose specified securities are listed on any recognized stock exchange(s) to frame a Policy for determination of materiality of event or information ("Policy"), duly approved by the Board of Directors.

The Lake Shore Realty Limited (the 'Company') had accordingly framed a policy for determination of materiality of events or information required to be disclosed to the Stock Exchanges.

II PURPOSE AND OBJECTIVE

The purpose of this policy for determination of materiality shall assist the relevant employees of the Company in identifying any potential material event or information and reporting the same to the authorized Key Managerial Personnel and for determining the materiality of the said event or information and for making the necessary disclosures to the stock exchange(s).

The Objectives of the Policy are to:

1. Enable the investors to make well-informed investment decisions
2. Take a view on the Materiality of an event that qualifies for disclosure under "the Regulations";
3. To authorize the Key Managerial Personnel to determine the materiality of an event or information and to make appropriate disclosures to the Stock Exchanges.

III DEFINITIONS:

1. **Authorised Key Managerial Personnel** means Whole-time Director or Managing Director or Chief Financial Officer or Company Secretary & Compliance Officer of the Company, who are authorised, individually or jointly, for determining the materiality of an event or information that qualifies for disclosure and to decide the appropriate time and details of its disclosure to be made to the Stock Exchange(s).
2. **Board of Directors or Board** means Board of Directors of the Company.
3. **Compliance Officer** means "Company Secretary" of the Company.
4. **Stock Exchanges** means where the Equity Shares of the Company are listed.

5. **"Promoter" and "Promoter Group"** shall have the same meaning as assigned to them respectively in clauses (oo) and (pp) of Regulation 2(1) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.
6. **"Subsidiary"** means a subsidiary as defined under Section 2(87) of the Companies Act, 2013.

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the SEBI Listing Regulations and Companies Act, 2013 as amended from time to time.

IV DISCLOSURE AND DETERMINATION OF EVENTS/INFORMATION

- (1) The Company shall make disclosures of any events or information which, in the opinion of the board of directors of the company, is material.
- (2) Events specified in Para A of Part A of Schedule III of Listing Regulation are deemed to be material events and the Company shall make disclosure of such events.
- (3) The Company shall make disclosure of events specified in Para B of Part A of Schedule III of Listing Regulation, based on application of the guidelines for materiality as mentioned below.
- (4) The Company shall consider the following criteria for determination of materiality of events/information:
 - (a) the omission of an event or information, which is likely to result in discontinuity or alteration of event or 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; or
 - (c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - i. 2 % of turnover, as per the last audited consolidated financial statements of the Company;
 - ii. 2 % of net worth, as per the last audited consolidated financial statements of the Company, except in case the arithmetic value of the net worth is negative;
 - iii. 5 % of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company;
 - (d) In case where the criteria specified in sub-clauses (i), (ii) and (Iii) is not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the Company, the event or information is considered material

V GUIDELINES FOR RUMOUR VERIFICATION

The Company shall confirm, deny or clarify any reported event or information in the mainstream media, which is not general in nature and indicates that rumours of an impending specific material event or information that are circulating amongst the investing public and also provide the current stage of such event or information.

Such disclosure will be as per the timelines prescribed under Listing Regulations.

VI GUIDELINES FOR DISCLOSURE EVENTS/INFORMATION

The Company shall disclose to the stock exchange(s) all events or information that are material, in terms of the provisions of Listing Regulation, as soon as reasonably possible and in any case within the following timelines:

- a. Within thirty minutes from the closure of the meeting of the Board of Directors in which the decision pertaining to such event or information is taken.

In case where the meeting of the Board of Directors concludes after normal trading hours of that day but more than three hours before the commencement of normal trading hours of the next trading day, the Company shall disclose the decision within three hours from the closure of the Board meeting.

Further, in case where the meeting of the Board of Directors is held over more than one day, the financial results shall be disclosed within thirty minutes or three hours, as applicable, from the closure of the meeting on the day on which such results are considered.

- b. Within twelve hours from the occurrence of the event or information, in cases where such event or information originates from within the Company.
- c. Within twenty-four hours from the occurrence of the event or information, in cases where such event or information does not originate from within the Company.

In case where all relevant information in respect of claims made against the Company under any litigation or dispute, other than tax litigation or dispute, in terms of sub-paragraph 8 of paragraph B of Part A of Schedule III, is maintained in the structured digital database in accordance with the provisions of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, disclosure of such claims shall be made to the stock exchange(s) within seventy-two hours of receipt of notice by the Company.

Further in case where disclosures in respect of events for which specific timelines have been prescribed under Part A of Schedule III of Listing regulation shall be made within such prescribed timelines.

Further in case where disclosure is made beyond the timelines specified under Listing Regulation, the Company shall, along with such disclosure, provide an explanation for the delay.

Explanation: Normal trading hours shall mean time period for which the recognized stock exchanges are open for trading for all investors.

- d. The Company shall, with respect to disclosures made under Listing Regulation, provide regular updates on material developments until such time the event is resolved or closed, along with relevant explanations.
- e. The Company shall disclose on its website all events or information that have been disclosed to the stock exchange(s) under listing Regulation. Such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter in accordance with the archival policy of the Company, as disclosed on its website.
- f. The Company shall disclose all events or information pertaining to its subsidiaries which are material to the Company.

VII GUIDELINES FOR COMMUNICATION

In case an event or information is required to be disclosed by the Company in terms of the provisions of Regulation 30, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

The Company shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions of this Policy as soon as reasonably possible and in any case not later than the timelines prescribed under Listing Regulations.

The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information.

In case where an event occurs or an information is available with the Company, which has not been indicated in Para A or B of Part A of Schedule III of Listing Regulation, but which may have material effect on it, the Company is required to make adequate disclosures in regard thereof.

VIII ANY OTHER INFORMATION / EVENT REQUIRING DISCLOSURE

- a. Such details as may be necessary to give the shareholders and general public sufficient information to form a fair view on the price of the securities of the Company.

- b. The disclosure guidelines prescribed by the Stock Exchange(s), if any shall be adhered to.
- c. Any event or information, including the information specified in Para A and Para B of Part A of Schedule III of the Listing Regulations shall be forthwith informed to the KMP(s) upon occurrence, with adequate supporting data/information, to facilitate a prompt and appropriate disclosure to the stock exchanges.
- d. The KMP(s) will then ascertain the materiality of such event(s) or information based on the above guidelines.
- e. On completion of the assessment, the KMP(s) shall, if required, make appropriate disclosure(s) to the stock exchanges.

IX PERSONS AUTHORIZED TO DECIDE ON THE MATERIALITY OF AN EVENT / INFORMATION FOR THE PURPOSE OF MAKING DISCLOSURE TO THE STOCK EXCHANGES

The Board have authorized the KMP to determine the materiality of an event or information and to make appropriate disclosure on a timely basis. The KMPs are also empowered to seek appropriate counsel or guidance, as and when necessary, from other internal or external stakeholders as they may deem fit. The KMPs shall have the following powers and responsibilities for determining the material events or information:

- a. To review and assess an event or information that may qualify as 'material' and may require disclosure, on the basis of facts and circumstances prevailing at a given point in time.
- b. To determine the appropriate time at which the disclosures are to be made to the stock exchanges based on an assessment of actual time of occurrence of an event or information.
- c. To disclose developments that are material in nature on a regular basis, till such time the event or information is resolved/closed, with relevant explanations.
- d. To consider such other events or information that may require disclosure to be made to the stock exchanges which are not explicitly defined in the SEBI Listing Regulations and determine the materiality, appropriate time and contents of disclosure for such matters.
- e. To disclose all events or information with respect to the subsidiaries which are material for the Company.

X INTERPRETATION

In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over these policies and procedure until such time as this Policy is amended to conform to the law, rule, regulation or standard.

XI REVIEW

This Policy shall be reviewed from time to time so that the Policy remains compliant with applicable legal requirements. Any subsequent amendment / modification in the Listing Regulations, Companies Act and/or applicable laws in this regard shall automatically apply to this Policy.

In case of any inconsistency between the contents of this Policy and provisions of Listing Regulations/Companies Act, the provisions of Listing Regulations/Companies Act shall prevail.

(This policy is revised by the Board of Directors at their meeting held on 23rd May, 2026 and effective from 23rd May, 2026)