INANI SECURITIES LIMITED

POLICY ON DETERMINATION OF MATERIALITY OF EVENTS

A. INTRODUCTION

INANI SECURITIES LIMITED (the "Company" or "ISL") shall determine and disclose material events or information in accordance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), ensuring that such disclosures are timely, accurate, and transparent. The Company shall apply a governance-led approach to assess materiality, considering the impact on stakeholders and the relevance to investors' decision-making. The Company aims to uphold the highest standards of compliance and corporate integrity, ensuring that all material disclosures are made in good faith and in the best interest of its shareholders and the market at large.

B. AUTHORISED PERSONS

The Company's Key Managerial Personnel and Compliance Officer shall determine materiality of information/ events and dissemination of the same as covered by this Policy. The Company Secretary will be the single point of contact for the above signatories who are authorized to determine materiality and make distributions covered by this Policy.

The Senior Management Personnel and such other persons, as determined by the aforesaid authorized persons shall be relevant employees for the purpose of this Policy, to identify potential event or information pertaining to their functional roles and report the same to the aforesaid Authorized Persons. The manner and timing of communication, and the details to be communicated shall be as specified by ISL from time to time. Board of Directors, MD, CFO, Key Managerial Personnel, Senior Management Personnel, and all other words not defined herein shall have the same meaning as assigned to those terms under the Listing Regulations, Companies Act, 2013 ("Act") or any other applicable laws or regulations, as the case may be.

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 caseto-case basis depending on specific facts and circumstances relating to the information/event, and Applicable Laws.

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. 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. LIMITATION, REVIEW AND AMENDMENT

In the event of any conflict between the provisions of this Policy and of the Applicable Laws, the provisions of Applicable Laws shall prevail over this Policy. Any subsequent amendment / modification to the Applicable Laws shall automatically apply to this Policy. The Board may review and amend this Policy from time to time, as may be deemed necessary.