

NUVAMA WEALTH MANAGEMENT LIMITED

POLICY

ON

DETERMINATION OF MATERIALITY OF INFORMATION OR EVENTS

1. Objective

In accordance with the Regulation 30 of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 and circulars issued thereunder, the Board of Directors of Nuvama Wealth Management Limited (“the Company”) has adopted this Policy at its meeting held on _____, for Determination of Materiality of Information or Events, so that such event and information can be promptly disclosed to the stock exchanges, as per the prescribed regulations.

The Policy will come into effect from the date of commencement of trading and listing of the equity shares of the Company on a recognised stock exchange(s) in India.

2. Policy

A. Any of the Key Managerial Person(s) authorised by the Board shall determine the materiality of any event or information, classify it as a Material event or Information and for the purpose of making disclosure to the stock exchanges.

B. Certain event and information would be per se Material event or Information as per regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

C. 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;

(c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:

(1) two percent of turnover, as per the last audited consolidated financial statements of the listed entity;

(2) two percent of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;

(3) 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 listed entity;

Provided that:

a. any event or information arising out of it in the normal course of business.

shall not be disclosed even though it fulfills the criteria of materiality. The Company to that extent can make qualified disclosures to the Stock Exchanges.

D. In some cases, to ascertain materiality, thresholds as prescribed in clause 2.C of this policy, cannot be applied, in such cases, any of the Key Managerial Person(s) authorised by the Board shall frame their opinion on a case to case basis, based on specific facts and circumstances relating to the information/event and while doing so, it may consider, among other factors, the following factors:

- (i) Whether there would any direct or indirect impact on the reputation of the Company; or
- (ii) Whether non-disclosure can lead to creation of false market in the securities of the Company; or
- (iii) Whether there would be a significant impact on the operations or performance of the Company.

E. 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 shall take precedence over the policy until such time as this policy is changed to conform to the law, rule, regulation or standard.

3. Dissemination

Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, this Policy and any amendment thereto shall be posted on the website of the Company.

4. Amendments

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

Version Control:

POLICY ON DETERMINATION OF MATERIALITY OF INFORMATION OR EVENTS	
Version:	Version -1
Reviewed by:	Pooja Doshi
Approved by:	Sneha Patwardhan
Effective Date:	August 2, 2023