SAHARA HOUSINGFINA CORPORATION LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF ANY EVENT/INFORMATION

1. Preface

The Board of Directors (the "Board") of Sahara Housingfina Corporation Limited (the "Company") has adopted the following policy and procedures with regard to determination of Materiality of events or information which are required to be disclosed to the Stock Exchanges in terms of Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) (The Policy). This Policy has been formulated in accordance with Clause (ii) of sub-regulation (4) of Regulation 30 of the Listing Regulations.

2. Purpose of the Policy

The purpose of this Policy is to determine materiality of events and information based on criteria specified under clause (i) of sub-regulation (4) of Regulation 30 of the Listing Regulations and to ensure that the Company shall make disclosure of events / information specified in para A and B of Part A of Schedule III of the Listing Regulations to the Stock Exchanges.

3. Criteria for determination of materiality of events/ information

The Company shall consider the criteria as specified in clause (i) of sub-regulation 4 of Regulation 30 of the Listing Regulations for determination of materiality of events / information.

4. Disclosure of events or information

A. The following events / information specified in para A of Part A of Schedule III to the Listing Regulations upon occurrence of which the Company shall make disclosure to the Stock Exchanges without any application of the guidelines for materiality:

i. Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation/ merger/ demerger/restructuring), or sale or disposal of any unit(s), division(s) or subsidiary of the listed entity or any other restructuring.
Explanation: For the purpose of this sub-para, the word 'acquisition' shall mean,-
(a) acquiring control, whether directly or indirectly; or,
(b) acquiring or agreeing to acquire shares or voting rights in, a company, whether directly or indirectly, such that -
(I) the listed entity holds shares or voting rights aggregating to five per cent or more of the shares or voting rights in the said company, or;
(II) there has been a change in holding from the last disclosure made under sub-clause (a) of clause (ii) of the Explanation to this sub-para and such change exceeds two per cent of the total shareholding or voting rights in the said company.

ii. Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.

iii. Revision in rating(s).

iv. Outcome of Meetings of the Board of Directors:
The Company shall disclose to the Stock Exchange(s), within 30 minutes of the closure of the meeting, held to consider the following:
a) dividends and/or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched;

b) any cancellation of dividend with reasons thereof;
c) the decision on buyback of securities;
d) the decision with respect to fund raising proposed to be undertaken
e) increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched;
f) reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to;
g) short particulars of any other alterations of capital, including calls;
h) financial results;
i) decision on voluntary delisting by the listed entity from stock exchange(s).

v. Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the Company), agreement(s)/treaty(ies)/contract(s) with media companies) which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.

vi. Fraud/defaults by promoter or key managerial personnel or by the Company or arrest of key managerial personnel or promoter.

vii. Change in directors, key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer , Company Secretary etc.), Auditor and Compliance Officer.

viii. Appointment or discontinuation of share transfer agent.

ix. Corporate debt restructuring.

x. One time settlement with a bank.

xi. Reference to BIFR and winding-up petition filed by any party / creditors.
xii. Issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the listed entity.

xiii. Proceedings of Annual and extraordinary general meetings of the Company.

xiv. Amendments to Memorandum and Articles of Association of the Company, in brief.

xv. Schedule of Analyst or institutional investor meet and presentations on financial results made by the Company to analysts or institutional investors;

B. The following events / information specified in para B of Part A of Schedule III to the Listing Regulations upon occurrence of which the Company shall make disclosure to the Stock Exchanges after following the procedural guidelines as given in para 5 of this Policy:

i. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.

ii. Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division (entirety or piecemeal).

iii. Capacity addition or product launch.

iv. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.

v. Agreements (viz. loan agreement(s) (as a borrower) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.

vi. Disruption of operations of any one or more units or division of the Company due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.

vii. Effect(s) arising out of change in the regulatory framework applicable to the Company.

viii. Litigation(s) / dispute(s) / regulatory action(s) with impact.

ix. Fraud/defaults etc. by Directors (other than key managerial personnel) or employees of the Company.

x. Options to purchase securities including any ESOP/ESPS Scheme.

xi. Giving of guarantees or indemnity or becoming a surety for any third party.

xii. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

C. Any other information / event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in the Company's securities.

D. Such disclosures of event / information as may be specified by the Board of Directors of the Company from time to time.

5. Procedural guidelines for determination of materiality of events/ information

In order to ensure that the Company complies with the disclosure obligations under Regulations 30 of the Listing Regulations, the Board has established an internal system for reporting any event / information which may require disclosure so that the event / information can be properly assessed and decision can be made regarding its disclosure to the Stock Exchange(s).

Under the system, Head of the Departments who are responsible for relevant areas of the Company's operations (Responsible Officers) must report to Mr. Vivek Kapoor, - Corporate Manager, Finance & Corporate Affairs *(designated as the Chief Financial Officer)* of any event / information which may possibly be material or of which the 'Responsible Officer' is unsure as to its materiality. The event / information should be reported immediately after a Responsible Officer becomes aware of it.

On receipt of communication of potential material event / information, the Mr. Vivek Kapoor, Corporate Manager - Finance & Corporate Affairs *(designated as the Chief Financial Officer)* shall:

i. Review event / information and to take whatever steps necessary to verify its accuracy;

ii. Assess whether the event / information is required to be disclosed to the Stock Exchanges under the Listing Regulations;

iii. Report the matter to Mr. D J Bagchi, Chief Executive Officer & Company Secretary that event / information is material and requires disclosure under Regulation 30 of the Listing Regulations. Where Mr. D J Bagchi, Chief Executive Officer & Company Secretary or Mr. Vivek Kapoor, Corporate Manager - Finance & Corporate Affairs is/are not certain about materiality of event / information, they may refer matter for external legal advice.

iv. The procedure to be followed in relation to the lodgement of announcement of material event / information is as follows:
   i. Prepare draft announcement to the Stock Exchange(s): If the event / information is material, the Company Secretary will prepare draft announcement to the Stock Exchanges which is factual and expressed in clear manner.
   ii. Lodge Announcements: The Company Secretary on behalf of the Company will lodge or arrange for lodgement of the announcement with the Stock Exchange(s).
   iii. Post announcement on website: After lodgement of the announcement with the Stock Exchange(s), the Company Secretary will arrange to place it on the website of the Company. All the announcements made under this Policy shall be kept on the website as per the Archival Policy of the Company.

6. Communication of this Policy

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the website of the Company.

7. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

8. Contact details of authorized personnel:

1. Mr. D J Bagchi
   Chief Executive Officer & Company Secretary (Compliance Officer)
   Phone No.: 033-22829067
   Email id: info.saharahousingfina@gmail.com

2. Mr. Vivek Kapoor
   Corporate Manager, Finance & Corporate Affairs (CFO)
   Phone No.: 033-22829067
   Email id: v_roopak@yahoo.co.in

This policy is reviewed on 29-May-2026