DESH RAKSHAK AUSHDHALAYA LIMITED

POLICY ON DETERMINATION OF MATERIALITY OF EVENTS AND INFORMATION

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POLICY ON DETERMINATION OF MATERIALITY OF EVENTS AND INFORMATION

1. Introduction

1.1 Regulation 30(4) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Listing Regulations') requires every listed entity to frame a policy for determination of materiality of events and information that requires appropriate disclosure to the stock exchanges. Further, such disclosures are required to be hosted on the website of the listed entity for a minimum period of 5 years and thereafter as per its Archival Policy.

1.2 Accordingly, Desh Rakshak Aushdhalaya Limited ('the Company') herein sets out a Policy for determination of materiality of events and information and disclosure thereof (hereinafter referred to the 'Policy').

1.3 The terms used but not defined in this Policy shall have the same meaning as assigned to them under the Listing Regulations.

2. Scope

This Policy sets out the criteria for determining materiality of an event and disclosure thereof.

3. Policy

3.1 Materiality has to be determined on a case to case basis depending on specific facts and circumstances relating to the information/event. In order to determine whether a particular event/information is material in nature, the Company shall consider the criteria(s) mentioned below:

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. two percent of turnover, as per the last audited consolidated financial statements of the Company;
ii. two percent 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. 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 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, the event / information is considered material.

3.2 Events / information specified in Para A of Part A of Schedule III of the Listing Regulations shall be disclosed without application of materiality guidelines.

3.3 The Company shall make disclosure of events specified in Para B of Part A of Schedule III, based on application of the guidelines for materiality as specified above.

4. Guidance on occurrence of event/availability of information

4.1 The timing of occurrence of an event and/or availability of information has to be decided on a case to case basis.

4.2 In case of natural calamities, disruptions etc. the events/ information can be said to have occurred when the Company becomes aware of the information.

4.3 In matters which would depend on the stage of discussion, negotiation or approval, the events/information can be said to have occurred upon receipt of approval by the Board of Directors or after receipt of approval of the Board of Directors and shareholders, as the case may be.

Sub-clause 4.1, 4.2 and 4.3 as mentioned above, shall be subject to guidance provided by the Securities and Exchange Board of India vide its circular no. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023 and Securities and Exchange Board of India vide its Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated January 30, 2026 as amended from time to time.

5. Implementation

5.1 To give effect to the requirements under the Listing Regulations, the Board has authorised the Team comprising of the Managing Director and the Company Secretary, determine the materiality of an event / information and disclose the same to the stock exchange.

5.2 The employees of the Company having access to, or becoming aware of the occurrence of, an event and/or information which are referred in Para 3.1 or 3.2 or 3.3 above shall report such event or information, as soon as possible, to the persons identified in Para 5.1 above so as to enable them to determine the materiality of an event / information and disclose the same to the stock exchanges within specified timeline.

6. Disclosure

6.1 The Company shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions of the Listing Regulations.

6.2 The Company shall also make disclosure of events / information as may be specified by the Securities and Exchange Board of India from to time.

6.3 All disclosures made under Listing Regulations shall contain the minimum information as stated in the Securities and Exchange Board of India vide its circular no. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023 and Securities and Exchange Board of India vide its Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated January 30, 2026 as amended from time to time being details that need to be provided while disclosing all events or information which are material in terms of the provisions of the Listing Regulations.

7. Website Disclosures

7.1 The event / information disclosed to the stock exchanges under this Policy shall also be placed on the website of the Company for a minimum period of five years or for such other period, if the period prescribed shall be more than five years by the Listing Regulations and /or the Securities Laws as defined in the Listing Regulation and thereafter as per the archival policy of the Company.

7.2 After completion of the minimum period of five years or such other period as prescribed by the Listing Regulations and/or Securities Laws the events or information shall be archived by the Company as per the archival policy of the Company. Thereafter, such events or information may ceased to be displayed on the website of the Company.

8. Amendment

Any subsequent amendment / modification in the Listing Regulations or any other governing Act / Rules / regulations or re-enactment, impacting the provisions of this Policy, shall automatically apply to this Policy and the relevant provision(s) of this Policy shall be deemed to be modified and / or amended to that extent, even if not incorporated in this Policy.

This Policy was last reviewed and amended by the Board of Directors at its meeting held on May 29, 2026.