SNS PROPERTIES AND LEASING LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS

I. BACKGROUND

The Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") requires every Listed Company to disclose events or information which, in the opinion of the Board of Directors of a Company are material. It is also incumbent upon the Company to frame a policy for determination of materiality which should be duly approved by the Board of Directors ("Board") of the Company and disclose on the Company's website.

In light of the foregoing requirements, the Board of the Company at their meeting held on 14th February, 2025, amended the policy for determination of materiality and disclosure of events or information pursuant to the requirements of Regulation 30 of Listing Regulations.

II. EVENTS WHICH ARE DEEMED TO BE MATERIAL EVENTS

The Company shall disclose all such events which are specified in Para A of Part A of Schedule III of the Listing Regulations (as applicable from time to time) without any application of the guidelines for materiality as specified in sub-regulation (2) of Regulation 30 of the Listing Regulations.

III. EVENTS WHICH ARE DEPENDENT ON APPLICATION OF GUIDELINES FOR MATERIALITY

The Company shall disclose all such material events specified in Para B of Part A of Schedule III of the Listing Regulations subject to application of guidelines for materiality.

GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION:

Quantitative criteria would be calculated based on audited financial statements of the last audited financial year, and would mean:

a. For points 1 to 9 of the Annexure, event/ information where the value involved or the impact exceeds 10 % of the turnover or net worth, whichever is lower.

b. For point 10 of the Annexure, Frauds/ defaults, etc. by directors (other than key managerial personnel) or employees of the Company involving financial impact of Rs. 1 crore or more.

c. For point 11 of the Annexure, Options to purchase securities, including any ESOP/ESPS Scheme amounting to 1% of post-issue equity share capital.

d. For point 12 of the Annexure, giving of guarantees or indemnity or becoming a surety for any third party in excess of 10% of the net worth of the Company.

e. Qualitative criteria would mean an event/ information:
    a) the omission of which is likely to result in discontinuity or alteration of event or information already available publicly; or

b) the omission of which is likely to result in significant market reaction if the said omission came to light at a later date; or
c) which may be treated as being material in the opinion of the Board of Directors of Company.

IV. ANY OTHER INFORMATION / EVENT WHICH IS TO BE DISCLOSED BY THE COMPANY

The Company shall disclose major developments that are likely to affect business, e.g. emergence of new technologies, any change of accounting policy that may have a 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 such securities.

V. MODIFICATION OF THE POLICY

In case of any subsequent amendment to the Regulations which makes any of the provisions in the Policy inconsistent, the provision of the Regulations shall prevail.

A copy of the policy shall also be disclosed on the website of the Company.

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Annexure

Events which shall be disclosed upon application of Quantitative criteria as set out in point III after the application of the Qualitative criteria:

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

2. 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).

3. Capacity addition or product launch.

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

5. 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.

6. 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.

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

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

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

10. Fraud/defaults etc., by directors (other than key managerial personnel) or employees of the Company.

11. Granting of options to purchase securities under ESOP/ESPS Scheme.

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