



STARLINEPS ENTERPRISES LIMITED

POLICY ON DETERMINATION OF MATERIALITY

[Pursuant to Regulation 30 of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015)]

Last Amendment and review: 20th May, 2025



PURPOSE OF POLICY:

Pursuant to Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “SEBI Listing Regulations”), the listed entity shall frame a policy for determination of materiality by listed entity, which shall be disclosed on its website of the Company.

This Policy has been formulated in accordance with the current guidelines laid down by Securities Exchange Board of India (“SEBI”), under Regulation 30(4)(ii) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), with respect to disclosure of events and information which in the opinion of the Board of Directors of the Company, is material as well as any price sensitive information.

The Policy outlines the guidelines to be followed by “StarlinePS Enterprises Limited” for the consistent, transparent, regular and timely public disclosure and dissemination of material events/information. The Company is committed to factual, timely and accurate disclosure based on applicable legal and regulatory requirements.

OBJECTIVE OF POLICY:

The objective of this Policy is to serve as a guiding Charter to the Management to ensure timely, sufficient & reliable information and communication in the coherent manner regarding material events that matters/makes influence on the Company are made to the stakeholders by the Company as the regulatory requirements under the Listing Regulations, to enable them to take well informed decisions with regard to the securities of the Company.

DEFINITIONS:

- I. “Company”** means “StarlinePS Enterprises Limited”;
- II. “Board”** means the Board of Directors of the Company;
- III. “Key Managerial Personnel”** means Managing Director or Whole Time Director or Chief Executive Officer or Chief Financial Officer or Company Secretary of the Company, who are authorised, individually or jointly, for determining the materiality of an event or information that qualifies for disclosure and to decide the appropriate time and details of its disclosure to be made to the Stock Exchange(s).
- IV. “Listing Regulations”** means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- V. “Policy”** means this Policy on Determination of Materiality;
- VI. “Schedule III”** means Schedule III of the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- VII. “Stock Exchanges”** means where the Equity Shares of the Company are listed
- VIII. “Subsidiary”** means a subsidiary as defined under Section 2(87) of the Companies Act, 2013

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.



GUIDELINES FOR DETERMINING MATERIALITY:

In order to determine whether a particular event/information is material in nature for disclosure to the stock exchanges, the Company shall consider the criteria(s) specified below:

The omission of an event or information which is likely to result in discontinuity or alteration of an event or information already available publicly; or

- 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 limits as prescribed under the SEBI Listing Regulations (as amended from time to time) i.e.
 - 1) two percent of turnover, as per the last audited consolidated financial statements of the Company; or
 - 2) two percent of net worth, except in case of the arithmetic value of the net worth is negative, as per the last audited consolidated financial statements of the Company;
 - 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 Company.Accordingly, any transaction exceeding the lower of 1), 2) or 3) above, with an annual impact in value, will be considered for the above purpose.

In case where the criteria specified in sub-clauses a), b) and c) above is not applicable, an event or information may be treated as being material if in the opinion of the Board, the event or information is considered material;

An events or information which are deemed material without application of guidelines for materiality, as specified under the SEBI Listing Regulations (as amended from time to time).

For the avoidance of doubt, events listed in Para A – Part A of Schedule III of SEBI Listing Regulations shall be disclosed without application of materiality criteria defined in the SEBI Listing Regulations and events or information specified in Para B of Part A of Schedule III of SEBI Listing Regulations will be disclosed based on application of materiality criteria.

AUTHORITY AND RESPONSIBILITY:

The Key Managerial Personnel of the Company (hereinafter referred to as the “Authorised Officials”) shall be severally responsible to deal with the dissemination of information and disclosure of any material event or information covered under this Policy to the Stock Exchange(s), where the shares of the Company are listed, as well as hosting the said event or information on the website of the Company simultaneously.

DISCLOSURES COVERED BY THIS POLICY:

The Company shall make timely disclosure of events which are material in nature in terms of this Policy to the stock exchange(s) where the shares of the Company are listed.

Any event or the information which comes in the knowledge of the Authorised Officials, though not covered above but has material effect on the operations of the Company will be adequately disclosed to the Stock Exchange(s).



The disclosure and communication of the material events and information shall be addressed in a clear and precise manner. The Authorised Officials of the Company will furnish prompt and accurate reply to the stock exchange on the queries raised by the stock exchange in relation to any events or information disclosed to it.

The access to all the disclosures made by the Company to stock exchange will also be made available on the website of the Company at www.starlineps.com. Any material developments in the events disclosed to the stock exchange shall also be disclosed in the requisite time frame.

TIMELINE FOR DISCLOSURE OF MATERIAL EVENTS:

The Company shall first disclose to stock exchange(s) of all events, as specified in Part I and Part II of this policy, or information as soon as reasonably possible and not later than twenty-four hours from the occurrence of event or information.

Further, in case the disclosure is made after twenty-four hours of occurrence of the event or information, the Company shall, along with such disclosures provide explanation for delay.

DELAY IN DISCLOSING MATERIAL INFORMATION:

In certain unavoidable circumstances or due to confidentiality of information for a limited period of time, the Company might delay in disclosing the material event/information to the stock exchange, in that case the disclosure regarding delay in disclosing the material event/ information along with the reasonable explanation and clarification will be disseminated to the stock exchange by the Authorised Officials of the Company.

REVIEW OF THE POLICY:

This policy shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments.
