PNC CAPITAL TRUST LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

Statutory mandate & objective

Regulation 30(4) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (herein referred to as "the Regulations")requires every listed entity to frame a policy for determination of materiality of events of information that requires appropriate disclosure to the exchange(s).

Accordingly, the policy for determination of Materiality of events or information (hereinafter referred to as "the policy") for PNC Capital Trust Ltd. (hereinafter referred to as "the Company") is hereby framed, setting forth the elementary aspects regarding disclosure practice to be followed by the Company.

Designated Authority for evaluating Events/Information as 'material'

The Regulations provide that the Board of Directors of the Company shall authorize one or more Key Managerial Personnel (KMP) for the purpose of determining materiality of an event or information and for the purpose of making disclosure to the stock exchanges under the Regulations.

The appointed KMP(s) shall take a view on materiality of an event or information qualifying for disclosure under clause 30 of the Regulations, decide the appropriate time at which such disclosure is to be filed with Stock Exchange(s) and details that may be filed in the best interest of present and potential investors.

The appointed KMPs are jointly or severally authorized for making disclosures of such material events or information, to the Stock Exchange(s).

The contact details of the above KMPs shall also be disclosed to the Stock Exchange(s) as well as placed on the website of the Company.

Criteria for Determining Materiality

While determining whether an event or information is material, the designated authority shall consider the criteria given in sub-regulation (4) of Regulation 30 of the SEBI Regulations, enumerated herein below:-

a) An event/information shall be treated as material if in the opinion of the Board of Directors of the Company, the event/information is considered as material.
b) Events specified in Para A of Part A of Schedule III shall be deemed to be material events and the designated Authority/Company shall make disclosure of such events.
c) For events other that as specified in (a) and (b) above, the designated Authority shall apply the following guidelines to decide the materiality of the event(s), as specified in sub-regulation 4 of Regulation 30 of SEBI Regulations :

    i) The omission of an event/information is likely to result in discontinuity or alteration of the event/information which is already available to the public.
    ii) Such omission is likely to result in significant market reaction if the said omission came to the knowledge of the public at a later date.

Disclosure

Information /events shall be disclosed by the Company to the Stock Exchange(s) as specified in the Regulations and Circulars/Guidance Note(s) issued thereto.

Disclosure on website

All material events or information, as disclosed to the Stock Exchange(s) under the Regulations, shall also be disclosed on the website of the Companywww.pnccapitaltrust.in and such disclosures shall be hosted on the website for a minimum period of five years and thereafter as per the Archival Policy of the Company.

Amendments/Modification of the Policy

In case of any subsequent changes in the provision of Acts/Regulations, which makes any of the provisions in the Policy inconsistent with the Act or Regulations, the provisions of the Acts/Regulations would prevail over the policy and the provisions in the policy would be modified in due course to make it consistent with law.