



Dynamic Portfolio Management & Services Ltd.

Regd. Office: 1403, Vikram Tower 16, Rajendra Place, New Delhi-110008,
Phone: 9017255300 Website: www.dynamicwealthservices.co.in ,
Email: dpms.kolkata@gmail.com, CIN: L74140DL1994PLC304881

POLICY ON DETERMINATION OF MATERIALITY OF EVENTS

1. BACKGROUND

The Securities and Exchange Board of India (SEBI) has issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") on September 2, 2015 to be effective from December 1, 2015. The Regulation 30 of these Listing Regulations deals with disclosure of Material Events/Information by the listed entity specified under Part-A of the Schedule III of the Listing Regulations. Further, SEBI has issued a circular on "Continuous Disclosure Requirements for Listed Entities" on September 9, 2015 indicating the details that need to be provided while disclosing above events. Therefore, in order to bring the Company's "Policy on Reporting of Material Events/Information" in line with the requirements under the Listing Regulations and SEBI Circular, the Company has framed its "Policy on Reporting of Material Events/Information".

2. OBJECTIVES OF THE POLICY

The objectives of the policy are as follows:

- a. Determine the materiality of an event/information based on the criteria specified under Regulation 30(4) of the Listing Regulation as amended from time to time that qualifies for disclosure under Regulation 30;
- b. To decide appropriate that when the above-mentioned disclosures shall be made to the stock exchanges based on the guidance provided in the SEBI circulars issued from time to time;
- c. To decide the details of disclosures to be made that is in the best interest of the present and potential investors based on the guidance provided in the SEBI Circulars issued from time to time;
- d. Communicating the principles of materiality based on which the Company shall make disclosures of events or information;
- e. Ensuring that adequate and timely information is provided to investors;
- f. Ensuring that all investors have equal access to information that may affect their investment decisions.



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3. MEANINGS OF THE TERMS USED

- a. **“Act”** means the Companies Act, 2013 including the rules, schedules, clarifications and guidelines issued by the Ministry of Corporate Affairs from time to time.
- b. **“Board”** refers to the Board of Directors of M/s Dynamic Portfolio Management & Services Limited.
- c. **“Company”** refers to M/s Dynamic Portfolio Management & Services Limited.
- d. **“Listing Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- e. **“Schedule”** means a schedule annexed to Listing Regulations, and
- f. **“Stock Exchange”** means a recognized stock exchange as defined under clause (f) of Section 2 of the Securities Contracts (Regulation) Act, 1956.

4. MATERIAL EVENTS/INFORMATION

The Listing Regulations divide the events that need to be disclosed broadly in two categories:

- 1. The events that have to be necessarily disclosed without applying any test of materiality are indicated in Para-A of Part-A of the Schedule-III of the Listing Regulations, as amended from time to time.
- 2. Para-B of Part-A of Schedule-III, as amended from time to time, indicates the events that should be disclosed by the listed entity, if considered material.

As per Regulation 30(3) of the Listing Regulations, 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 in Regulation 30(4), as follows:

- a. The omission of an event or information 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;



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- c. In case where the criteria specified in sub-clauses (a) and (b) are not applicable, an event/information may be treated as being material if in the opinion of the Board of Directors of the Company, the event/information is considered material.

In case of any modification, addition or deletion of these guidelines, in future, the Company shall accordingly make requisite disclosures.

5. COMPETENT AUTHORITY FOR DETERMINING MATERIAL EVENTS/INFORMATION AND MAKING DISCLOSURES

The Listing Regulations requires the Board of Directors to authorize one or more Key Managerial Personnel for the purpose of determining and ascertaining the materiality of an event or information which qualifies for disclosure under Regulation 30 of Listing Regulations and to decide the timelines within which such disclosure is required to be disseminated to the Stock Exchanges.

The Managing Director and Chief Financial Officer of the Company shall severally be responsible and authorized for ascertaining the materiality of events considering its nature and its disclosure after taking into consideration the various provisions of the Regulation and this policy.

The Managing Director or Chief Financial Officer shall decide whether the event falls under Para-A or Para-B of Part-A of the Schedule-III of Listing Regulations and if it falls under Para-B, then, whether it is material in nature and by when it needs to be reported to the stock exchanges.

The Managing Director, Chief Financial Officer and Company Secretary of the Company shall be severally responsible and authorized for dissemination of such events and information in accordance with the provisions of the Regulations or any other law as may be applicable.

After deciding whether event or information is material by the Managing Director or Chief Financial Officer, the Company Secretary or Chief Financial Officer shall disseminate the same to the stock exchanges with covering letter and upload the same on the website of the Company.



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6. CONTACT DETAILS OF THE AUTHORIZED KEY MANAGERAIL PERSONNEL

NAME	DESIGNATION	CONTACT DETAILS
Rajesh Gupta	Manging Director	Dynamic Portfolio Management and Services Limited Address: 1403, 14 th Floor, Vikram Tower-16, Rajendra Place, New Delhi-110008 Contact Number: +91- 11-45222201 Email: dpms.kolkata@gmail.com

7. REVIEW OF THE POLICY

In case there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended at the next possible opportunity. However, the emended regulatory requirements will supersede the Policy, till the time, this Policy is suitably amended.

For and on behalf of
Dynamic Portfolio Management & Services Limited

S/d
Director