

# PRIDE HOTELS LIMITED

## POLICY FOR DETERMINATION OF MATERIALITY OF ANY EVENT/INFORMATION

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

Head Off. : "The Ruby", 5th Floor, Office No.5 SC, South Wing on Level 8th Senapati Bapat Marg, Mumbai – 400 028 India

•CIN No. U55200DL1983PLC219781 •Toll free : 1800 209 1400 •Tel.: +91-22-4037 2424 / 4037 2415 •E-mail : headoffice@pridehotel.com

Regd. Off.: Pride Plaza Hotel, Asset 5A, Hospitality District, Delhi Aerocity, IGI Airport, New Delhi - 110037 Tel.: +91 11 71 60 0700. •Website : [www.pridehotel.com](http://www.pridehotel.com)



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### Upcoming Properties:

Shikesh | Daman | Bhavnagar | Dwaraka | Nalinital | Jim Corbett | Bharuch | Halol | Jabalpur | Agra | Haldwani  
SurenDRanagar | Rajkot | Neemrana | Chandigarh | Dehradun | Mysore | Aurangabad | Gurugram | Bhopal | Bangalore  
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As per Regulation 30(4)(iii) of Securities Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulations, 2015 (“Listing regulations”) the listed entity is required to frame the policy for determination of materiality based on the criteria as mentioned in the listing regulations. The Board of Directors of the Company have framed this policy for determination of the events which are material and which has to be intimated to the Stock Exchange. **(hereinafter referred to as “Policy”)**

The Board shall review this policy on regular basis and may make such amendments in the policy as may be required from time to time.

This policy is effective from September 22, 2025.

“Board” means Board of Directors

“Listing Regulations” means Securities Exchange Board of India (Listing obligation and Disclosure Requirement) Regulations, 2015

“Company” or “Listed Entity” means Pride Hotels Limited

“Stock Exchange” means the Stock Exchange on which company is listed

Following are the factors to be considered for determination of materiality of events/information:

(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:

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**Upcoming Properties:**  
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- ## Timeline for disclosure of material events/information to Stock Exchange

Provided that if all the relevant information, in respect of claims which are made against the listed entity under any litigation or dispute, other than tax litigation or dispute, in terms of sub-paragraph 8 of paragraph B of Part A of Schedule III of Listing Regulations,

However, the disclosure with respect to events for which timelines have been specified in the Listing Regulations shall be made within such timelines.

The Company shall with respect to any disclosures make further disclosures updating material developments on regular basis till such time the event is resolved/closed, with relevant explanations.

In case there is any delay in disclosure the Company will be providing the explanation for such delay in disclosure.

The Company will be disclosing on its website all such events or information which has been disclosed to stock exchange(s) as specified in the Listing Regulations and in this policy and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company.

Any clarification/information on the queries raised by the stock exchange, will be provided by the Company to the Stock exchange as soon as may be reasonably practicable.

The Company may on its own initiative also confirm and deny any reported event or information to the stock exchange.

In case were any event occurs or an information is available with the Company which is not been indicated in the Listing Regulations, but which may have material effect, the Company will make adequate disclosure in this regards.

In case an event or information is required to be disclosed by the Company in terms of the provisions of the Listing regulations, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company will disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority to the Stock Exchange.

Any of the Agreement entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the listed entity or of its holding, subsidiary or associate company, among themselves or with the listed entity or with a third party, solely or jointly, which, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or impose any restriction or create any liability upon the listed entity, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the listed entity is a party to such agreements. Such disclosure shall be made by the Company within Two working days to the Stock Exchanges.

Provided that such agreements entered into by a listed entity in the normal course of business shall not be required to be disclosed unless they, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or they are required to be disclosed in terms of any other provisions of these regulations.

### Authority to the Persons who can determine materiality of an event/information

The Managing Director/Whole Time Director or any of the Key Managerial Person including but not limited to, Company Secretary and Chief Financial Officer of the Company are been hereby authorised by the Board of Directors of the Company for the purpose of making disclosures to the Stock Exchange.

## Amendments

The Board may subject to the applicable laws or the amendments in any of the provisions or at their own discretion as may be thought necessary by them, may amend this policy, in pursuant to Listing Regulations.

### Conflict between Policy and Listing Regulations

Where in any event there is conflict between this Policy and Listing Regulations or any of the circulars issued by any Authority, the Listing Regulations or any of the circulars issued by any Authority shall prevail over this policy.

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