



INDIABULLS REAL ESTATE LIMITED

(CIN: L45101DL2006PLC148314)

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POLICY ON DETERMINATION OF MATERIALITY

Approving Body:	Board of Directors vide resolution dated October 21, 2015
Original Issue Date:	October 21, 2015, effective from December 01, 2015
Key Managerial Persons for this Policy	Mr. Gurbans Singh, Joint Managing Director, Mr. Vishal G. Damani, Joint Managing Director, Mr. Anil Mittal, CFO Mr. Ravi Telkar, Company Secretary

SCOPE AND PURPOSE

The Securities Exchange Board of India (SEBI) on September 2, 2015, has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Regulations”).

Regulation 30 requires the Company to frame and adopt a policy to determine the material events by testing the materiality for the purpose of proper, sufficient and timely disclosure of the same to the stock exchanges.

Accordingly, this Policy on Determination of Materiality has been approved and adopted by the Board of Directors of Indiabulls Real Estate Limited (henceforth referred to as “the Company”) at its meeting held on October 21, 2015.

APPLICABILITY

This Policy shall be applicable to all events relating to the Company, as and when they come under the criteria elucidated below.

This Policy shall be read together with the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information formulated and adopted by the Company to lay down the procedures and practical guidelines that would be followed by the Company for the consistent, transparent, regular and timely public disclosure and dissemination of Unpublished Price Sensitive information.

KEY PRINCIPLES IN DETERMINING MATERIALITY

The Company shall consider the following criteria for determination of materiality of event or 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;
- (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 listed entity, the event / information is considered material.

ADMINISTRATIVE MEASURES

- a. Unless otherwise decided by the Board, any two KMPs acting jointly shall be authorized for the purpose of determining materiality of an event or information and making disclosures to the stock exchange. Any decision taken by them shall be valid and binding on the Company.
- b. The contact details of all the KMP shall be disclosed to the stock exchange and also be placed on the Company's website.
- c. The KMPs shall take into consideration the factors surrounding the particular information to take a view on whether the information is market sensitive or not.

INTERPRETATION

In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over these policies and procedures until such time as this Policy is amended to conform to the law, rule, regulation or standard.

AUTHORITY

The Board of Directors or Management Committee of the Board of Directors of the Company is authorized to make such modifications to this Policy and add/delete/amend the names to the list of KMPs named hereinabove, as considered appropriate, subject however, to the condition that such modifications shall not be inconsistent with the provisions of the Regulations.
