



LE TRAVENUES TECHNOLOGY LIMITED

**POLICY FOR DETERMINATION OF
MATERIALITY OF INFORMATION AND EVENTS**

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Le Travenues Technology Limited

Policy for Determination of Materiality of Information and Events

1. Introduction

Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “**SEBI Listing Regulations**”) provides that a listed entity shall frame a policy for determination of materiality, based on criteria specified in sub-regulation (4) of Regulation 30, duly approved by its board of directors, which shall be disclosed on its website.

The board of directors of Le Travenues Technology Limited, at its meeting held on August 03, 2021, approved Le Travenues Technology Limited - Policy for Determination of Materiality of Information and Events (the “**Policy**”), which was subsequently amended by the board of directors at their respective meetings held on January 06, 2022, May 16, 2024, and October 10, 2025.

2. Definition

- (i) “**Authorised Person(s)**” means any of the following Key Managerial Personnel who shall determine materiality of events in accordance with the Policy:
 - Chairman, Managing Director & Group CEO
 - Group Chief Financial Officer
 - Group General Counsel, Company Secretary & Compliance Officer
- (ii) “**Board**” means the board of directors of Le Travenues Technology Limited.
- (iii) “**Company**” means Le Travenues Technology Limited
- (iv) “**Mainstream Media**” shall include print or electronic mode of the following:
 - i. Newspapers registered with the Registrar of Newspapers for India;
 - ii. News channels permitted by Ministry of Information and Broadcasting under Government of India;
 - iii. Contents published by a publisher of news and current affairs content as defined under the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021; and
 - iv. Newspapers or news channels or news and current affairs content similarly registered or permitted or regulated, as the case may be, in jurisdictions outside India.

- (v) “**Relevant Employees**” shall mean the Senior Management Personnel, and such other employees as may be identified from time to time by the Authorised Person(s), who, based on the nature of their functional responsibilities, are reasonably expected to identify potential events or information that may be material.

All other words and expressions used but not defined in this Policy but defined in the Companies Act, 2013, the SEBI Listing Regulations, the SEBI Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and/ or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them under such acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

3. Objective

The objectives of this Policy are to:

- Establish the criteria for determining the materiality of events or information;
- Ensure adequate and timely disclosure of material events or information through the stock exchanges and the Company’s website, so as to enable investors to make informed investment decisions; and
- Provide a governance framework for determination of materiality of events/information that require disclosure to the stock exchanges.

Further, this Policy is intended to guide Relevant Employees in identifying potential material events or information that may require reporting to the Authorised Person(s).

4. Determination of materiality

- a) The events specified in Para A of Part A of Schedule III of the SEBI Listing Regulations, shall be deemed to be material events / information and shall be disclosed to the Stock Exchanges without application of materiality criteria;
- b) The events specified in Para B of Part A of Schedule III of the SEBI Listing Regulations shall be disclosed if it satisfies the materiality criteria set out below:
 - the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or

- 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
- the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - (1) two percent of turnover, as per the last audited consolidated financial statements of the Company;
 - (2) two percent of net worth, as per the last audited consolidated financial statements of the Company, except in case the arithmetic value of the net worth is negative;
 - (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.

However, in certain instances, all three parameters specified above (viz. turnover / net worth / profit) may not be relevant to an event. Accordingly, in that case, reference can be made to the Industry Standards Note on Regulation 30 of the SEBI Listing Regulations, or any other circular(s), FAQ(s) issued by SEBI or Stock Exchanges from time to time.

- c) As per Para C of Part A of Schedule III, the Company shall also disclose any major development that is likely to affect its business, such as emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc., and any other information which is exclusively known to the Company which may be necessary to enable the shareholders of the Company to take informed decision about their shareholding.
- d) In case where the criteria specified in this sub-clause (a), (b), and (c) above are not applicable, events / information may be treated as material if in the opinion of the Authorised Person(s) / Board, the event / information is considered material.
- e) All events or information with respect to subsidiaries which are material for the Company.
- f) In case an event or information is required to be disclosed by the Company, pursuant to the receipt of a communication from any regulatory, statutory, enforcement, or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure is prohibited by such authority.

- g) In the event the provisions relating to verification of market rumours become applicable to the Company, the Company shall, confirm, deny or clarify, upon the material price movement as may be specified by the stock exchanges, any reported event or information in the mainstream media which is not general in nature and which indicates that rumour of an impending specific event or information is circulating amongst the investing public, as soon as reasonably possible but in any case not later than twenty four hours from the trigger of material price movement, in accordance with the SEBI Listing Regulations and Industry Standard Notes on verification of market rumours.

The director, key managerial personnel or senior management of the Company shall provide adequate, accurate and timely responses to queries raised or explanation sought by the Company in order to ensure compliance with the requirements as stated above and the Company shall disseminate the response received from such individual(s) promptly to the stock exchanges.

5. Process of the disclosure

- a) The Relevant Employees of the Company having access to, or becoming aware of the occurrence of an event and/or information which are referred in sub-clause (a), (b), or (c) of clause (4) above shall report such event or information, as soon as possible, to the Authorised Person(s) so as to enable them to determine the materiality of an event / information and disclose the same to the stock exchanges within specified timeline.
- b) The Authorised Person shall determine the materiality of an event/information based on the events and information laid down under Regulation 30 of the SEBI Listing Regulations for making necessary disclosures to the stock exchanges.
- c) Unless specific timelines have been provided under Regulation 30 of the SEBI Listing Regulations, the Company shall disclose to the stock exchanges all material events or information as soon as reasonably possible and, in any case, not later than the following deadlines:
- 30 (thirty) minutes from the closure of the Board meeting in which the decision about the material event or information has been taken.

Provided that in case the meeting of the board of directors closes after normal trading hours of that day but more than three hours before the beginning of the normal trading hours of the next trading day, the Company shall disclose the decision pertaining to the event or information, within three hours from the closure of the board meeting.

Provided further that in case the meeting of the board of directors is being held for more than one day, the financial results shall be disclosed within thirty minutes or three hours, as applicable, from closure of such meeting for the day on which it has been considered.

Explanation: Normal trading hours shall mean time period for which the recognized stock exchanges are open for trading for all investors.

- 12 (twelve) hours from the occurrence of the material event or information, in case such material event or information is emanating from within the Company, and
- 24 (twenty-four) hours from the occurrence of the material event or information in case such event or information does not emanate from within the Company.

In case there is a delay in disclosure of an event / information from the prescribed timelines, the Company shall, along with such disclosure, explain such delay.

- d) The Company shall, with respect to disclosures referred to in Regulation 30, make disclosures updating material developments on a regular basis, till the time such event is resolved / closed, with relevant explanations.
- e) All the material disclosures made by the Company under Regulation 30 of the SEBI Listing Regulations shall be uploaded on the website of the Company and shall continue to 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, as disclosed on its website.
- f) In case the stock exchanges raise any queries with respect to any events or information, the Authorized Person(s) shall provide specific and adequate reply to the stock exchanges.
- g) The contact details of the Authorized Person(s) to determine materiality of events under this Policy are as follows:

Chairman, Managing Director & Group CEO / Group Chief Financial Officer /
Group General Counsel, Company Secretary & Compliance Officer

Le Travenues Technology Limited
Second Floor, Veritas Building, Sector - 53, Golf Course Road,
Gurugram - 122 002, Haryana, India.
Tel: +91 - 124 - 668 2111
Email: investors@ixigo.com

6. Amendment

The Board reserves the right to modify and/or amend the Policy at any time. Any subsequent amendment / modification in the Act or the rules framed thereunder or the SEBI Listing Regulations and/or any other laws in this regard shall automatically apply to this Policy.

The Policy (as amended from time to time), shall be published on the website of the Company at www.ixigo.com