KINETIC TRUST LIMITED

POLICY FOR DETERMINING MATERIAL SUBSIDIARIES

1. INTRODUCTION

This Policy has been formulated in accordance with the applicable provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations"), as amended from time to time.

The purpose of this Policy is to establish the criteria and procedures for determining material subsidiaries of Kinetic Trust Limited ("the Company") and to ensure compliance with applicable corporate governance and disclosure requirements.

2. PRESENT STATUS

As on the date of approval of this Policy, **Kinetic Trust Limited does not have any subsidiary**.

Accordingly, the provisions of the SEBI LODR Regulations relating specifically to material subsidiaries are not presently applicable to the Company in respect of any subsidiary.

If the Company establishes or acquires a subsidiary in the future, the Company shall determine whether such subsidiary qualifies as a material subsidiary in accordance with applicable law and this Policy.

3. CRITERIA FOR DETERMINING MATERIAL SUBSIDIARIES

If the Company establishes or acquires any subsidiary in the future, the materiality of such subsidiary shall be determined in accordance with Regulation 16(1)(c) of the SEBI LODR Regulations, as amended from time to time.

A material subsidiary shall generally mean a subsidiary whose income or net worth exceeds 10% of the consolidated income or net worth, respectively, of the Company and its subsidiaries in the immediately preceding accounting year, in accordance with the applicable regulatory definition.

The determination shall be based on the relevant financial statements and other requirements prescribed under applicable law.

4. GOVERNANCE REQUIREMENTS

If any subsidiary is established or acquired and qualifies as a material subsidiary, the Company shall comply with the applicable provisions of Regulation 24 and other relevant provisions of the SEBI LODR Regulations.

Such compliance shall include, wherever applicable, requirements relating to independent directors, review of financial statements, reporting of significant transactions and arrangements, disposal of shares or assets, and other prescribed corporate governance requirements.

5. MONITORING AND REVIEW

The Company Secretary or other officer designated by the Board shall monitor the Company's subsidiary status and, if a subsidiary is established or acquired, assess its materiality in accordance with applicable law.

The materiality status shall be reviewed whenever required under the SEBI LODR Regulations or when relevant circumstances change.

6. DISCLOSURE

This Policy shall be disclosed on the Company's website in accordance with the applicable provisions of the SEBI LODR Regulations.

Any amendment to this Policy shall be approved by the Board of Directors and disclosed in accordance with applicable law.

7. AMENDMENT

The Board of Directors may amend or modify this Policy from time to time to ensure compliance with applicable statutory and regulatory requirements.

In the event of any inconsistency between this Policy and applicable law, the relevant statutory or regulatory provisions shall prevail.

8. EFFECTIVE DATE

This Policy shall become effective from the date of its approval by the Board of Directors of Kinetic Trust Limited and shall remain in force until amended or replaced.