

## **GUJARAT BOROSIL LIMITED**

### **POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION**

#### **INTRODUCTION**

The Board of Directors of Gujarat Borosil Limited (GBL) has approved & adopted the following revised policy in its meeting held on March 30, 2018 with regards to determination of materiality of events or information, pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

#### **TITLE**

This policy shall be called 'Policy with regards to determination of materiality of events or information'.

#### **POLICY**

The Listing Regulations divide the events that need to be disclosed broadly in two categories. The events that have to be necessarily disclosed without applying any test of materiality are indicated in Para A of Part A of Schedule III of the Listing Regulation. Para B of Part A of Schedule III indicates the events that should be disclosed by the listed entity, if considered material.

#### **As per Regulation 30(2) & Schedule III:**

Events specified in Para A of Part A of Schedule III are deemed to be material events and the Company shall make disclosure of such events.

#### **As per Regulation 30(3) & Schedule III:**

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 below sub-regulation

(i) The Company shall consider the following criteria 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;

(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 Company, the event / information is considered material.

The Board of Directors shall appoint one or more Key Managerial Personnel (KMP) for the purpose of determining materiality of an event or information, in case of any event not falling within the criteria mentioned above as set by the Board.

However, mere discussion on any transactions or signing of Non-Disclosure Agreement (NDA) or any understanding for carrying out due diligence for any transactions shall not be treated as material events or information.

In case where an event occurs or an information is available with the Company, which has not been indicated in Para A or B of Part A of Schedule III, but which may have material effect on it, the Company will make adequate disclosures in regard thereof.

#### **AUTHORISATION:**

Mr. V Ramaswami, Whole Time Director and/ or Mr. Sunil Roongta, CFO and/ or Mr. Kishor Talreja, Company Secretary of the Company, Key Managerial Personnel (KMP) be authorised to make disclosures to BSE Limited under this regulation.

Contact details:

Mr. Ramaswami Velayudhan Pillai – email id: [vr@borosil.com](mailto:vr@borosil.com) – Ph: 022 – 67406300

Mr. Sunil Roongta – email id: [sunil.roongta@borosil.com](mailto:sunil.roongta@borosil.com) – Ph: 02645-258150

Mr. Kishor Talreja – email id: [kishor.talreja@borosil.com](mailto:kishor.talreja@borosil.com) – Ph: 022 - 67406502

The above contact details of such KMP's shall also be disclosed to the BSE Limited as well as displayed on the website of the Company. The Board of Directors can change KMPs from time to time.

#### **DISCLOSURE:**

The Disclosures of events or information shall be made in the manner as specified in Schedule III – Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

#### **MARKET RUMOURS**

Except as otherwise provided in the Policy, as a matter of best practice, the Company shall refrain from commenting on any Market Rumors and speculations. However, at times the Stock Exchanges might require clarifications on the market rumours which will be dealt with by Company accordingly.

#### **AMENDMENTS**

The Board may, subject to applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new policy.

## **SCOPE AND LIMITATION**

In the event of any conflict between the provisions of this Policy and the Listing Regulation / Companies Act, 2013 or any other statutory enactments, rules, the provisions of such Listing Regulation / Companies Act, 2013 or statutory enactments, rules shall prevail over this policy.

## **DISSEMINATION OF POLICY**

This policy shall be hosted on the website of the Company ie [www.gujaratborosil.com](http://www.gujaratborosil.com)