

POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

Background:

As per Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (herein after referred to as SEBI Listing Regulations), a listed entity is required to frame a policy for determination of materiality for disclosure of events or information to Stock Exchanges, based on the criteria specified in Regulation 30 of the said Regulations and the same is also required to be disclosed on the Company's website.

Policy:

Taking into account the aforesaid provisions & other applicable legal provisions, the Policy on determination of materiality for disclosures to events or information is being made as under:

1. The Company shall consider the following criteria for determination of materiality of event or information:
 - (a) the omission of an event or information, 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) 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 the Company, the event / information is considered material.
2. The Chairman & Managing Director (CMD) and the Company Secretary are authorised persons for the purpose of determining materiality of an event or information.
3. The Chairman & Managing Director (CMD) and the Company Secretary are authorized for making disclosures of such material event or information, to the stock exchanges.
4. The Chairman & Managing Director is authorised to make appropriate changes to the above policy as he may deem expedient taking into account the law for the time being in force.
5. This Policy is subject to review from time to time.

Place: Vadodara

Date: 12th February, 2016

Ashok Malhotra

Chairman & Managing Director