



POLICY FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION FOR DISCLOSURES

EDELWEISS FINANCIAL SERVICES LIMITED – POLICY FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION FOR DISCLOSURES

Introduction

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the Listing Regulations) as issued by the SEBI *inter-alia* require the companies whose securities are listed on the Stock Exchanges to make disclosures of certain events in a timely manner, to enable the holders of securities to apprise its position and to avoid the establishment of a false market.

Criteria for determining materiality of certain events or information

The Company shall make disclosures of any events or information which is likely to have a significant impact on the market price of the securities of the Company.

The events or information as specified in Para A – Part A of Schedule III of the Listing Regulations shall be disclosed without application of the materiality criteria.

Further, for determination of materiality of the events or information for disclosure to the Stock Exchanges, the following criteria (or such other criteria as may be specified in the Listing Regulations from time to time) shall be considered: -

- i) the omission of an event / information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
- ii) 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
- iii) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - two percent of turnover, as per the last audited consolidated financial statements of the listed entity;
 - two percent of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;
 - 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 listed entity.

In accordance with the Listing Regulations, the Company shall disclose all events or information with respect to its subsidiaries, which are material for the Company.

In the event of any conflict between the provisions of this Policy and of the Listing Regulations/any other applicable law, the Listing Regulations/any other applicable law shall prevail over the Policy.

Power to determine materiality

The Key Managerial Personnel of the Company shall jointly and severally determine the materiality of events or information and dissemination of the events or information covered under the Policy and to make appropriate disclosures on a timely basis. The Company Secretary shall in consultation with the other Key Managerial Personnel of the Company determine the deviation, if any, from the principles mentioned in the Policy.

Disclosure Requirements

The Listing Regulations has specified the events or information requiring disclosures in accordance with the provisions of the Listing Regulations Accordingly, the Company shall intimate make the disclosure to the Stock Exchanges within the applicable timelines.

Review of Policy

This Policy shall be reviewed by the Board as may be deemed necessary. In case of any change/amendment in the Listing Regulations, the Policy shall stand amended to that extent.