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**BHARAT  
BHUSHAN**

SINCE 1954

# **BHARAT BHUSHAN FINANCE & COMMODITY BROKERS LTD.**

(Corporate Identity Number - L67120DL1992PLC 049038)

Regd Off: 503, Rohit House, 3 Tolstoy Marg, New Delhi-110001

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## **POLICY ON CRITERIA FOR DETERMINING MATERIALITY OF EVENTS**

### **1. OBJECTIVE**

The Policy is framed in accordance with the requirements of Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations).

The objective of the Policy is to determine materiality of events or information of the Company and to ensure that such information is adequately disseminated in pursuance with the Regulations and to provide an overall governance framework for such determination of materiality.

### **2. GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION**

Events / information shall be considered as Material if it meets any of the following criteria:

- (a) the event or information is in any manner unpublished price sensitive information;
- (b) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly;
- (c) 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; and
- (d) any other event/information which is treated as being material in the opinion of the Board of Directors of the Company.

### **3. DISCLOSURES OF EVENTS OR INFORMATION**

Events specified in Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 are deemed to be material events and the Company shall make disclosure of such events or information as soon as reasonably possible and not later than twenty four (24) hours from the occurrence of such event or information in the following manner:

- i. inform the stock exchanges in which the securities of the Company are listed;
- ii. upload on the corporate website of the Company.

The Company shall make disclosures updating Material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.

The Company shall disclose all events or information with respect to its Material Subsidiaries (if any).

The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information and on its own initiative. Further it shall confirm or deny any event or information to stock exchange(s) reported in the media.

In case where an event occurs or information is available with the Company, which has not been indicated in Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, but which may have material effect on it, the Company will make adequate disclosures in regard thereof.

All the above disclosures would be hosted on the website of the Company for a minimum period of five years and thereafter archived as per Company's policy for Preservation and Archival of Documents.

#### **4. AMENDMENTS**

The Board may subject to the 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. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

#### **5. AUTHORITY FOR MAKING DISCLOSURE(S) AND FOR EVALUATING EVENTS/ INFORMATION AS 'MATERIAL'**

The following Key Managerial Personnel are authorised for determining materiality of events or information and making Disclosure(s) to Stock Exchange:

- a) Mr. Vijay Bhushan, Non-Executive Director
- b) Mrs. Nisha Ahuja, Non-Executive Director
- c) Ms. Sonia Luthra, Company Secretary & Compliance Officer

in accordance with the provisions of these regulations, as may be in force from time to time, read with guidance, circular and other supplementary text issued thereupon:

Further, the Contact Details of abovementioned Key Managerial Personnel shall be disclosed to the stock Exchange(s) and as well as on the website of the Company.

#### **6. SCOPE AND LIMITATION**

In the event of any conflict between the provisions of this Policy and the Listing Agreement; Companies Act, 2013; Regulations or any other statutory enactments, rules, the provisions of such Listing Agreement / Companies Act, 2013 or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

#### **7. DISSEMINATION OF POLICY**

This Policy shall be hosted on the website of the Company and address of such web link thereto shall be provided in the Annual Report of the Company. This Policy shall also be hosted on Company's internet.