

# **Sarvottam Finvest Limited**

## **A. BACKGROUND**

Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), requires every listed company, whose specified securities are listed on any recognized stock exchange(s) to frame a policy for determination of materiality (“Policy”), duly approved by the Board of Directors.

Thus, the objective of this Policy is to determine the materiality so that the events/information which satisfy the criteria of ‘materiality’ could be promptly disclosed to the Stock Exchange(s).

## **B. DEFINITIONS:**

“Company” means Sarvottam Finvest Limited

“Material Events / Information” means events/information determined based on application of the guidelines for materiality referred in sub-regulation (4) of Regulation 30 of the Listing Regulations.

Material Subsidiary” shall mean a subsidiary, whose income or net worth exceeds ten percent of the consolidated income or net worth respectively, of the Company and its subsidiaries in the immediately preceding accounting year.

“Policy” means the policy for determination of materiality.

“Subsidiary” or “Subsidiaries” means subsidiary or subsidiaries of the Company as defined in sub-section (87) of Section 2 of the Companies Act, 2013.

“Specified Securities” means ‘equity shares’ and ‘convertible securities’ as defined under clause (eee) of sub-regulation (1) of Regulation 2 of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.

## **C. POLICY:**

A) This Policy applies only to events specified in Para B of Part A of Schedule III of the Listing Regulations.

B) The Company Secretary and/or Chief Financial Officer and/or any other officials authorised by the Managing Director and Chief Financial Officer (hereinafter referred as “Authorised Persons”), in consultation with the Managing Director and Chief Financial Officer of the Company shall be the authority to determine the materiality of any events/information, classify it as a Material Event/Information and decide the appropriate time at which disclosure is to be filed with Stock Exchange(s). However, event/information which are classified as material should be disclosed as soon as reasonably possible and not later than twenty-four hours from the occurrence of the event or information and in case the disclosure is made after twenty-four hours of occurrence of the event or information, the Company shall, along with such disclosures provide explanation for delay. The event / information may pertain to the Company and/or its Material Subsidiaries. However, as on date, there are no subsidiaries of the company.

*(An illustrative list of Material Event or Information as mentioned above, which would require reporting to Stock Exchange(s), is attached as Annexure I)*

C) The Authorised Persons shall frame their opinion on a case-to-case basis, based on specific facts and circumstances relating to materiality of the information / event and while doing so, it may consider, among other factors, the following factors:

(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 listed entity, the event / information is considered material.

**REVIEW/REVISION OF POLICY:**

If at any point a conflict of interpretation / information between the Policy and any regulations, rules, guidelines, notification, clarifications, circulars, master circulars/ directions issued by relevant authorities ("Regulatory Provisions") arises, then interpretation of the Regulatory Provisions shall prevail.

In case of any amendment(s) and/or clarification(s) to the Regulatory Provisions, the Policy shall stand amended accordingly from the effective date specified as per the Regulatory Provisions.

## **ANNEXURE I**

B. Events which shall be disclosed upon application of the guidelines for materiality referred sub-regulation (4) of regulation (30):

1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2. Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division (entirety or piecemeal).
3. Capacity addition or product launch.
4. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
5. Agreements (viz. loan agreement(s) (as a borrower) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
6. Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
7. Effect(s) arising out of change in the regulatory framework applicable to the listed entity.
8. Litigation(s) / dispute(s) / regulatory action(s) with impact.
9. Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.
10. Options to purchase securities including any ESOP/ESPS Scheme.
11. Giving of guarantees or indemnity or becoming a surety for any third party.
12. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.