

SINGHANIA BROTHERS LTD

CIN : L51909WB1982PLC035145

SEBI Regn No. : INB 031018935

RBI Regn No. : B.05.02054

2/10, Sarat Bose Road, Garden Apartment

Block - A, Kolkata- 700 020

Ph No.: 033 79611711

Website : singhaniabroltd.com

E-mail : promptcal@gmail.com

POLICY ON DETERMINATION AND DISCLOSURE OF MATERIALITY OF EVENTS AND INFORMATION

The Company shall determine and disclose material events or information in accordance with the applicable regulations ensuring that such disclosures are timely, accurate, and transparent.

The Company shall apply a governance-led approach to assess materiality, considering the impact on stakeholders and the relevance to investors' decision-making.

The Company aims to uphold the highest standards of compliance and corporate integrity, ensuring that all material disclosures are made in good faith and in the best interest of its shareholders and the market at large.

The objectives of the Policy are as follows:

- A. To provide an overall governance framework for determination of materiality of events/information which require disclosure to the Stock Exchange(s);
- B. To ensure that the Company complies with the disclosure obligations under the SEBI Listing Regulations and Circulars, Guidance issued thereunder ; and
- C. To ensure that adequate and timely information is provided to investors to enable them to take informed investment decision.

Verification of Market Rumors:

Notwithstanding the above, the Company shall, upon Material Price Movement, confirm, deny or clarify any reported event or information in the Mainstream Media which is not general in nature and which indicates that rumors of an impending specific material event or information are circulating amongst the investing public, as soon as reasonably possible and in such manner as per the discretion of the Board of Directors.

Determination of Materiality

Materiality has to be determined on a case to case basis depending on specific facts and circumstances relating to the information/event. In order to determine whether a particular event/information is material in nature, the Company shall consider the criteria(s) mentioned below:

- 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; or
- C. The omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - i. Two percent of turnover, as per the last audited consolidated financial statements of the Company;
 - ii. Two percent of net worth, as per the last audited consolidated financial statements of the Company, except in case the arithmetic value of the net worth is negative;
 - iii. 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 Company.
- D. If in the opinion of the Board of Directors, the event / information is considered material.

SINGHANIA BROTHERS LTD.

Shalini Singha
Director

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Disclosure Process

After evaluation, in case the event/information is considered as material, adequate disclosure shall be made to the appropriate regulating body.

The Company shall use electronic facilities provided by different regulatory body for dissemination of the information and may subsequently disclose the same via other media, including the press release, website of the Company, etc.

The Company shall adhere to the statutory timeframes for disclosure of information to the appropriate regulating body.

Adoption & Amendment to the Policy

The Board of Directors, shall review this Policy as it may deem fit and may amend this Policy from time to time.

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Shalini Singhania
Director

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