

**RELIABLE VENTURES INDIA LIMITED**  
**POLICY FOR DETERMINATION OF MATERIALITY OF INFORMATION OR EVENT**

**(I). BACKGROUND**

1. Reliable Ventures India Limited (RVIL) being a listed entity is committed to transparency towards all its stakeholders and in disseminating material information in a fair and timely manner. Its Equity Shares are listed on the Bombay Stock Exchange Ltd. (BSE). Effective the 1<sup>st</sup> day of December, RVIL must comply with the continuous disclosure obligations as promulgated by SEBI in the name and style of "SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015, that are hereafter referred to as the "Listing Regulations" and come into effect from December 1, 2015.
2. Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements), 2015 ("Regulations"), requires that every listed entity shall formulate and adopt a Policy for determination of materiality of information/events ("Material Events Disclosure Policy") so that such information can be promptly disclosed to the stock exchanges and made available to all stake holders, as per the prescribed regulations.
3. This Policy on Determination of Materiality of events or information warranting disclosure to investors has been formulated and approved by the Board of Directors of RVIL in compliance with the requirements of the Listing Regulations.

**(II). OBJECTIVE OF THE POLICY**

This Policy of the RVIL for determination of materiality of corporate events/information is aimed at attaining the following objectives:

1. To ensure compliance with the Listing Regulations disclosure norms
2. To ensure that the disclosures are correct, timely and transparent.
3. To ensure adequate protection of the confidentiality of Material events / Price sensitive information without compromising with the disclosure obligations in any manner
4. To ensure uniformity in the approach to disclosures

**(III) GUIDELINES FOR DETERMINING MATERIALITY OF OTHER EVENTS OR INFORMATION**

In the matter of events /information listed under Para-B of Schedule III to the Regulations and events and information other than those contained under Para (III) above that are mandatorily deemed material, the RVIL shall determine the materiality of an event / information for the purpose of disclosure to Stock Exchanges by applying the following criterion:

- (a) that event or information is, in any manner, unpublished price sensitive information;
- (b) the omission of disclosure of it is likely to result in discontinuity or alteration of event or information already available publicly;
- (c) the omission of its disclosure is likely to result in significant market reaction if the said omission came to light at a later date; and
- (d) Events or information not covered by above, but it is considered as being material in the opinion of the Board of Directors of the Company that their impact on the turnover and/or net worth of the company( measure in term audited standalone financial statements of the Company for the preceding financial year exceeds 20 per cent .
- (e) Any other event/ information which is material in the opinion of Board of Directors of the Company

#### **Time period for Disclosure to the Bombay Stock Exchange Ltd.**

RVIL shall make disclosure of events/ information as specified in para (IV) above of this Policy, if considered material after application of aforesaid guidelines for determining materiality as early as possible but not later than 24 hours of occurrence thereof or within such time and manner as may required by the BSE .

#### **(IV). DISCLOSURE OF EVENTS OR INFORMATION THAT ARE MANDATORILY DEEMED MATERIAL**

The following events and information are listed under PART-A of Schedule III of the aforesaid Regulations shall be mandatorily deemed as material events/information AND shall be disclosed to the Bombay Stock Exchange (BSE) without applying the above mentioned guidelines for determination of materiality of events/ information:

- (i) Commencement or any postponement in the date of commencement of commercial operations of any unit/division
- (ii) Change in the general character or nature of business brought about by arrangements for strategic, technical, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division (entirety or piecemeal).
- (iii) Capacity addition.
- (iv) Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business
- (v) 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.

- (vi) 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.
- (vii) Effect(s) arising out of change in the regulatory framework applicable to the listed entity.
- (viii) Litigation(s) / dispute(s) / regulatory action(s) with impact.
- (ix) Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.
- (x) Options to purchase securities including any ESOP/ESPS Scheme.
- (xi) Giving of guarantees or indemnity or becoming a surety for any third party. 12. Granting, withdrawal, surrender

### **Time period for Disclosure to the stock exchanges**

Events/ information tabulated under this Paragraph (III) shall be disclosed to the Stock Exchange as soon as reasonably possible but not later than twenty four (24) hours from the occurrence thereof.

### **DISCLOSURE ON WEBSITE**

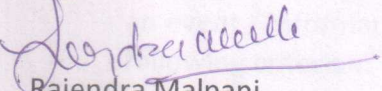
RVIL shall disclose on its website all such events or information which have been disclosed to stock exchanges(s) under Listing regulations by way of hosting on the website.

### **(V) PERSONS AUTHORISED TO DETERMINE MATERIALITY:**

The Board of Directors of the RVIL has conferred joint authority on its Managing Director and the Company Secretary to determine the materiality of any event/information for the purpose of disclosure to the Stock Exchanges. In the normal course, the Company Secretary shall make disclosure to the Stock Exchanges in respect of material events or information under Regulation 30 of Listing Regulations. However, such disclosures can also be made either by Managing Director & CEO or Chief Financial Officer of the Company.

### **(VI) REVIEW AND AMENDMENT:**

This Policy contained herein above is based on the current business and legal scenario and can be reviewed, amended, modified or revised by the Board of Directors of the Company from time to time. In case any provisions of this Policy are contrary to or inconsistent with the requirements/ provisions of the Companies Act, 2013, rules framed there under and Listing Regulations ("statutory Provisions"), the provisions of Statutory Provisions shall prevail.

  
Rajendra Malpani  
Director