POLICY FOR DETERMINIATION OF MATERIALITY OF EVENTS FOR DISCLOSURE TO STOCK EXCHANGES

1. INTRODUCTION

In pursuance of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), Adventz Securities Enterprises Limited ("the Company") is required to formulate a policy for determination of materiality of events and information which are required to be disclosed to the stock exchanges where the securities of the Company are listed ("Stock Exchanges"). Accordingly, the Board of Directors of the Company at its meeting held on November 13, 2015 approved and adopted this "Policy for Determination of Materiality of Events for Disclosure to Stock Exchanges" ("Policy") which shall be effective from December 1, 2015.

2. OBJECTIVE

The Policy aims to provide a framework for determining materiality of events and information for the purpose of making disclosure to Stock Exchanges in terms of Regulation 30 of Listing Regulations.

3. CRITERION FOR DETERMINATION OF MATERIALITY

The following criterion/ thresholds shall be considered for determination of materiality of events and information:

3.1 Qualitative Materiality Criterion

a) The omission of an event or information 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 criterion specified in sub-clauses (a) and (b) above are not applicable, an event/ information may be treated being material, if in the opinion of the Board of Directors of the Company, the event or information is considered material.

3.2 Quantitative Materiality Thresholds

The event or information the impact of which is more than 10% of the turnover or net worth of the Company, as the case may be. These thresholds shall be determined on the basis of audited financial statements of the Company for the preceding financial year.

4. MATERIAL EVENTS AND INFORMATION

4.1. The events specified in Para A of Part A of Schedule III to the Listing Regulations shall be deemed to be material events for the purpose of disclosure to the Stock Exchanges, without application of materiality criterion/ thresholds given in clause 3 above.

4.2. The following events and information conforming to the qualitative materiality criterion given in clause 3.1 above or quantitative materiality thresholds given in clause 3.2 above shall be considered material for the purpose of disclosure to the Stock Exchanges in terms of Regulation 30(3) of the Listing Regulations:

Sr. No.	Event / Information
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 (in entirety or piecemeal).
3.	Capacity addition or product launch.
4.	Awarding, bagging/ receiving a contract or order or amendment or termination thereof, not in the normal course of business.
5.	Agreements including loan agreement(s), as a borrower or any other agreement(s) which are binding and not in normal course of business and any revision or amendment or termination thereof.
6.	Disruption of operations of any one or more units or divisions of the Company due to natural calamity (earthquake, flood, fire etc.), force majeure or other events such as strikes, lockouts, etc.
7.	Effect(s) arising out of change in the regulatory framework applicable to the Company.
8.	Any Litigation / dispute / regulatory action with impact.
9.	Fraud/ defaults, etc. by directors (other than key managerial personnel) or employees of the Company.
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.

4.3 The Company shall also disclose any other event or information to the Stock Exchanges which is considered material by the Board of Directors of the Company.

4.4. The aforesaid events and information shall be disclosed to the Stock Exchanges in the manner prescribed under Listing Regulations.

5. AUTHORITY

5.1. The Board of Directors of the Company has authorised the Managing Director, Chief Financial Officer and Company Secretary, any two of them acting jointly, to determine the materiality of any event/ information (including that of its subsidiaries) for the purpose of disclosure to the Stock Exchanges.

5.2 Normally, the Company Secretary shall make necessary disclosures of events or information to the Stock Exchanges under Regulation 30 of Listing Regulations. However, such disclosures can also be made either by Chief Financial Officer or Managing Director of the Company.

6. AMENDMENT

This Policy can be 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 provisions of the Companies Act, 2013, rules framed thereunder and Listing Regulations ("Statutory Provisions"), the provisions of Statutory Provisions shall prevail.