

PIYUSH LTD

CIN: L51109WB1981PLC034303

REGISTERED ADDRESS : 13 MANDEVILLIE GARDENS 1A
GOVARDHAN, KOLKATA, WEST BENGAL, INDIA, 700019

EMAIL ID : goenka2012@gmail.com

POLICY ON DETERMINATION OF MATERIALITY OF EVENTS

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) requires every Listed Company to disclose events or information which, in the opinion of the Board of Directors of a Company, are material.

The objectives of the Policy are as follows:

- (a) To ensure that the Company complies with the disclosure obligations under the Listing Regulations;
- (b) To provide an overall governance framework for determination of materiality of events/information which require disclosure to the Stock Exchange(s); and
- (c) To ensure that adequate and timely information is provided to investors to enable them to take informed investment decision.

DETERMINATION OF EVENTS OR INFORMATION

In terms of Regulation 30 of the listing regulations, the Company is required to consider the following criteria for determination of materiality of any event / information:

- a) Events or information specified in Para A of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed without any application of the guidelines for materiality.
- b) Events or information specified in Para B of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed based on application of materiality criteria.

Where the omission of an event/ information, is likely to result in:

- a) discontinuity or alteration of event/ information already available publicly; or
- b) a significant market reaction if the said omission came to light at a later date. Where it would be difficult to report the events/information based on criteria as stated in points a) and b) above, the same may be considered as material for disclosure if in the opinion of the Board of directors of Company, the event / information is considered material, upon meeting the materiality thresholds as mentioned herein below.

MATERIALITY

An event would be considered material if omission of such event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:

- a. two percent of turnover, as per the last audited consolidated financial statements of the Company;
- b. 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;
- c. 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;

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DISCLOSURES:

As prescribed under Regulation 30(6) of the SEBI Listing Regulations, all events or information which are material as determined under this Policy shall be disclosed to the stock exchange(s), as soon as reasonably possible and in any case not later than: a. thirty minutes from the closure of the meeting of the board of directors in which the decision pertaining to the event or information has been taken; b. twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the Company; c. twenty-four hours from the occurrence of the event or information, in case the event or information is not emanating from within the Company.

AUTHORITY

The Board of Directors of the Company has authorised the Whole time Director to determine in consultation with the Board of the Company and Senior Advisor of the company, the materiality of an event or information based on this policy and for making disclosures towards stock exchanges under this regulation. The Contact details are as follows:

Mr. Piyush Goenka

Whole Time Director

Email : goenka2012@gmail.com

AMENDMENT

The Authorised Persons may review the Policy from time to time is hereby authorised to amend, as and when deemed fit.