

# **THE SWASTIK SAFE DEPOSIT AND INVESTMENTS LIMITED POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION**

**Effective Date: 12<sup>th</sup> February, 2016**

## **I. Introduction**

Pursuant to Regulation 30(4)(ii) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), as amended from time to time, the Company is required to frame a policy for determination of materiality for disclosure of events or information to Stock Exchanges, based on such criteria specified in the said regulation, and also upload the same on the website of the Company.

## **II. Title, Commencement & Extent**

This Policy is called the The Swastik Safe Deposit & Investments Limited Policy on Determination of Materiality for disclosure of events or information.

## **III. Definitions**

In this Policy, unless the context otherwise requires,

1. “Company” means The Swastik Safe Deposit & Investments Limited (‘Swastik’).
2. “Policy” means this Policy on Determination of Materiality for disclosure of events or information, as may be modified from time to time.
3. “Listing Regulations” mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.
4. “Material Events or Information” shall have the meaning as described in Schedule III to the Listing Regulations, which is defined in para 1.2(i) of Annexure I hereto for ease of reference;
5. “SEBI” means the Securities and Exchange Board of India.
6. “Stock Exchange(s)” means BSE Limited where the equity shares of the Company are listed.

## **IV. Appointment of KMP for determining materiality for disclosure of events and information**

1. The Company shall designate the Chief Financial Officer (‘CFO’), Key Managerial Personnel (‘KMP’) of the Company, for the purpose of determining materiality of events or information to be disclosure to the Stock Exchanges pursuant to Regulation 30(5) of the Listing Regulations.

2. Contact details of the above KMPs shall be also disclosed to the Stock Exchange(s) as well as on Company's website.

**V. Disclosures under this Code**

1. The CFO shall be responsible for approving any disclosure or dissemination of Material Information:
  - (i) by way of intimation to the stock exchanges;
  - (ii) on Swastik's official website; and
  - (iii) in any other manner as may be decided by the CFO.
2. Any communication containing Material Information to be made to the stock exchange, and others shall require the prior authorization of the CFO and shall be in the manner as determined by CFO.
3. The CFO shall also be responsible for supervising information posted on the Investor Section of the website of Swastik ('herein referred to as 'Website Content for Investors') in terms of this Policy.

**VI. 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 there under or the SEBI Listing Regulations ("Statutory Provisions"), the Statutory Provisions shall prevail over this code.

\*\*\*\*\*