



## MAGNUM VENTURES LIMITED

### POLICY FOR DETERMINATION OF MATERIALITY OF ANY EVENT / INFORMATION

#### 1. Preface

The Board of Directors (the “Board”) of Magnum Ventures Limited (the “Company”) has adopted the following policy and procedures with regard to determination of Materiality of events or information which are required to be disclosed to the Stock Exchanges in terms of Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) (The Policy). This Policy has been formulated in accordance with Clause (ii) of sub-regulation (4) of Regulation 30 of the Listing Regulations.

#### 2. Purpose of the Policy

The purpose of this Policy is to determine materiality of events and information based on criteria specified under clause (i) of sub-regulation (4) of Regulation 30 of the Listing Regulations and to ensure that the Company discloses events / information specified in Para A of Part A of Schedule III of the Listing Regulations, and if material, Para B of the Part A of Schedule III to the Stock Exchanges.

#### 3. Criteria for determination of materiality of events / information

The Company shall consider the criteria as specified in clause (i) of sub-regulation 4 of Regulation 30 of the Listing Regulations for determination of materiality of events /information.

The company shall make disclosure of any events or information which, in the opinion of the Board of Directors, is material on the following criteria:

(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;

(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. 2% (two percent) of turnover, as per the last audited consolidated financial statements of the listed entity;

ii. 2% (two percent) of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;

iii. 5% (five percent) of the average of absolute value of profit or loss after tax, as per the last 3 (three) audited consolidated financial statements of the listed entity;

In case where the criteria specified in sub-clauses (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the listed entity, the event or information is considered material .

#### 4. Disclosure of events or information

4.1. In pursuance to Regulation 30 of the Listing Regulations & within the framework of this policy the Board through the Key Managerial Person(s), would be authorized to disclose the Events/Information specified in Para A of Part A of Schedule III of Listing Regulations shall be disclosed to the Stock Exchanges, without application of the criteria as specified in Clause 3(c) of this Policy.

4.2. In pursuance to Regulation 30 of the Listing Regulations & within the framework of this policy any events and information specified in Para B of Part A of Schedule III of Listing Regulations shall be disclosed to the Stock Exchanges based on conforming to the criteria as specified in Clause 3(c) of this policy.

4.3. Any other event/ information viz. major development that is likely to affect business of the Company significantly in opinion of the Board of the Company shall be disclosed to the Stock Exchanges, such as:

(a) Emergence of new technologies;

(b) Expiry of patents;

(c) Any change of accounting policies that may have a significant impact on the accounts of the Company and brief details thereof;

(d) Any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities.

4.4. In case where an event occurs or an information is available with the Company, which has not been indicated in Para A or B of Part A of Schedule III of the Listing Regulations, but which may have material effect on the Company, as determined by the Board of the Company or Authorize KMPs in accordance with this Policy, the Company is required to make disclosures in regard thereof.

4.5. In case an event or information is required to be disclosed by the Company in terms of the provisions of Regulation 30 of the Listing Regulations, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

4.6. The Company may make disclosures of events/ information as specified by SEBI from time to time.

#### 5. Procedural Guidelines for determination of materiality of events/ information

5.1. The Company shall disclose to the Stock Exchanges all events/ information which are material in terms of the provisions of this Policy and Regulation 30 of the Listing Regulations, as soon as reasonably possible and in any case not later than:

(a) 30 (thirty) minutes from closure of the Board meeting in which the decision pertaining to the event/ information has been taken;

(b) 12 (twelve) hours from occurrence of event/ information, where the event/ information is emanating from within the Company;

(c) 24 (twenty-four) hours from occurrence of event/ information, where the event/ information is not emanating from within the Company.

5.2. Disclosures with respect to events for which timelines have been specified in Part A of Schedule III of the Listing Regulations shall be made within such timelines.

5.3. In case disclosure is made after timelines specified under Regulation 30 of the Listing Regulations, the Company shall, along with such disclosure provide the explanation for the delay.

## 6. Website Updation / Updates to stock exchanges

Any disclosure of events or information which has been submitted by the Company to the Stock Exchange(s) under Regulation 30 of the Listing Regulations and Policy of the Company (Disclosed Information) will be available on the website of the Company for a period of five years from the date of its disclosure. Disclosed Information which is over five years old will be archived from the website of the Company. Anyone intending to review the Disclosed Information may write to Compliance Officer of the Company.

## 7. Communication of this Policy

For all new KMPS, HODs and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing KMPS, HODs and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the web-site of the Company.

## 8. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

For and behalf of **Magnum Ventures Limited**

Signed and approved by-  
**Board of Directors**