



CAPITAL TRADE

LINKS LTD.

CIN : L519090DL1984PLC019622

**“Policy for Determination of
Materiality for Disclosure of
Information/ Events to the Stock
Exchange(S)”**

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OBJECTIVE

As per the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (the “Regulations”), the Company is required to disclose to the Stock Exchange(s) events and information set out in Para A of Part A of Schedule III of the Regulations, as and when they take place in the Company. Further, in respect of events and information set out in Para B of Part A of Schedule III of the Regulations, the Company has to frame a policy for determining materiality of event/information for disclosure to the Stock Exchange(s).

The objective of this policy is therefore to define the events/ information to be disclosed to Stock Exchange(s); to lay down criteria for identification/ determination of material events/ information and designate persons authorized to determine materiality and disclosure.

EVENTS/INFORMATION DEEMED TO BE MATERIAL

Para A of Part A of Schedule III of the Regulations prescribes list of events/ information, which are deemed material and as and when such events/ information takes place, Company shall promptly disclose the same to the Stock exchange(s) within the prescribed time.

EVENTS/INFORMATION FOR WHICH MATERIALITY TO BE DETERMINED

Para B of Part A of Schedule III of the Regulations prescribes list of events/ information which shall be disclosed upon application of criteria for determination of materiality as laid down in Regulation 30 (4) and reproduced below:

- (a) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly;
- (b) the omission of an event or information is likely to result in significant market reaction on Company’s securities, if the said omission came to light at a later date;

- (c) In case where the criteria specified in (a) or (b) above are not applicable, an event/information may be treated as being material if in the opinion of the Board of Directors of the Company; the event/information is considered material.

Taking into consideration above requirements, Company will consider any event/ information material for disclosure to the Stock exchange(s), if such event/ information is likely to have impact on company's revenue or profit.

Materiality of all the events/ information with respect to subsidiaries, if any shall be determined after applying above criteria.

All the events/information considered material after applying above criteria shall be disclosed to Stock exchange(s) and on the website of the company as prescribed in the Regulations.

PERSONS AUTHORISED TO DETERMINE MATERIALITY

The Board of Directors of the Company have authorized the Managing Director and in his absence the Chief Financial Officer and in the absence of both of them, the Company Secretary to determine materiality of event or information that has taken place, for the purpose of making disclosure to the Stock exchange(s).

REVIEW AND AMENDMENT:

The Board may monitor, review and amend the Policy from time to time as also whenever necessitated due to amendments in the Regulations.