

# **NILKANTH ENGINEERING LIMITED**

## **POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION**

### **1. LEGAL FRAME WORK**

The Board of Directors (the “Board”) of **Nilkanth Engineering Limited** ( the “Company) has adopted the following policy with regards to disclosures of material events which are necessary to be disclosed to the Stock Exchanges based on the criteria as may be deemed necessary and has been adopted as party of Policy

The Policy is made in pursuance to Regulation 30 of Chapter IV of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulation, 2015 (“LODR”). The Board may review and amend this Policy from time to time

This Policy will be applicable to the Company effective 13<sup>th</sup> December, 2016

### **2. OBJECTIVE**

The objective of this Policy is to serve as a guiding charter to the management to ensure that timely and adequate disclosure of events or information are made to the investor community by the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, to enable them to take well informed investment decisions with regard to the securities of the Company.

### **3. DEFINITIONS**

- (a) “**Act**” means the Companies Act, 2013 (and the Rules) and the Companies Act, 1956 to the extent applicable.
- (b) “**Board of Directors**” means the Board of Directors of the Company.
- (c) “**Company**” means **Nilkanth Engineering Limited**
- (d) “**Key Managerial Personnel**” means key managerial personnel as defined under sub-section (51) of section 2 of the Companies Act, 2013.
- (e) “**Listing Regulations**” means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- (f) “**Policy**” means this policy, as amended from time to time.
- (g) “**SEBI**” means the Securities and Exchange Board of India.
- (h) “**Rules**” means the rules made under the Companies Act, 2013.
- (i) “**Stock Exchange(s)**” means BSE Limited, where the equity shares of the Company are listed.

### **4. EVENTS WHICH ARE DEEMED TO BE MATERIAL EVENTS:**

The Company shall disclose all such events which are specified in Para A of Schedule III of are deemed to be material events and listed entity shall make the disclosure of such events.

**5. EVENTS WHICH ARE DEPENDENT ON APPLICATION OF GUIDELINES FOR MATERIALITY:**

The Company shall disclose all such material events pertaining to itself or its subsidiary(ies), specified in Para B of Part A of Schedule III of the Listing Regulations subject to application of guidelines for materiality.

**6. CRITERIA FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION:**

Pursuant to Reg. 30(4), the Company shall consider the following criteria for determination of materiality of events / information

- a) The Omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publically;  
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 criteria specified in sub-clause (a) and (b) above are not applicable, an event / information may be treated as being material if in the opinion of the Board of Directors of listed entity, the events / information is considered material

**7. DISCLOSUR OF EVENTS / INFORMATION AND PRESERVATION THEREOF :**

The Company shall first disclose to the Stock Exchange of all events, as specified in Part A of Schedule III or information as soon as possible and not later than 24 hours from the occurrence of event or information.

Provided that in case the disclosure is made after 24 hours of occurrence of the events or information, the Company shall, along with such disclosure provide explanation for delay

Provided Further that the disclosure of events specified in sub-para 4 of Para A of Part A of Schedule III, i.e. Outcome of the Board Meeting shall be made within 30 minutes of conclusion of the Board Meeting.

In addition to the above, the Company shall ensure that Company shall disclose on its web site all such events or information which has been disclosed to Stock Exchange and such disclosures shall be hosted on the website of the Company for a minimum period of 5 years and shall thereafter be archived from the website of the Company for a period of 3years.

**8. DISCLOSUR OF EVENTS / INFORMATION AND PRESERVATION THEREOF:**

Mr. G. M. Loyalka (DIN – 00299416) Director of the Company is responsible for

the purpose of determining the materiality of any events or information which have bearing on the performance / share price etc. of the Company. He shall inform to the Company Secretary about the materiality of any information / event through mail communication which shall then be intimated to the Company Secretary as part of Disclosure Compliance

**9. DISCLOSURE:**

The Policy for determination of materiality of events / information is available on the Company's website.