

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

PREAMBLE

The Board of Directors of EFC (I) Limited has approved and adopted this policy for determination of 'Material Events' in order to ensure timely and adequate disclosure to the stakeholders. The Board or any of its Committee, as may be authorized, may review and/or amend this policy from time to time either in the interest of investors or to ensure compliance with Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'Listing Regulations').

PURPOSE

This policy is framed as per the requirement of Regulation 30 of Listing Regulations. The Broad objective of the Policy is (i) to identify material events and/or information relating to the Company; and (ii) to ensure timely and adequate disclosure of such identified material events or information to the Stock Exchanges.

AUTHORIZATION FOR DETERMINATION OF MATERIAL EVENTS

The Key Managerial Personnel of the Company comprising of the Chief Financial Officer and Company Secretary of the Company, from time to time, shall be jointly responsible for determining 'materiality of events or information' in connection with those mentioned in Para B of Part A of Schedule III of the Listing Regulations, which are required to be disclosed/disseminated to Stock Exchanges, based on following criteria's prescribed under the Listing Regulations:

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

DISPLAY AND DISCLOSURE

The Company Secretary shall ensure that relevant information in connection with material events and those information which are price sensitive, as prescribed under Listing Regulations, shall be disseminated to the Stock Exchanges and a copy of such intimation shall be uploaded simultaneously on the website of the Company.

EVENTS WHICH ARE DEEMED TO BE MATERIAL EVENTS

The Company shall disclose all such events which are specified in Para A of Part A of Schedule III of the Listing Regulations (as applicable from time to time) without any application of the guidelines for materiality as specified in sub-regulation (4) of Regulation 30 of the Listing Regulations.

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.

SCOPE AND LIMITATION

In the event of any conflict between the provisions of this Policy and the Act or Listing Regulations or any other statutory enactments or rules, the provisions of Listing Regulations / Act or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

AUTHORIZATION TO ACCEPT / DENY REPORTED EVENT OR INFORMATION

The Company shall generally maintain silence in case of rumors with respect to the Company unless otherwise decided by the Key Managerial Personnel who are hereby jointly and severally authorized to accept / deny suo-moto any report, event or information, which has been un-authorizedly made public by media or by any other means including but not limited to electronic means. They are further authorized to respond to the rumors amongst the general public, which has no basis or documentation, in a way which best protects the interests of the Company.

DISCLAIMER

In any circumstances, where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the newly enacted law, rule, regulation or standard will take precedence over this Policy until such time the Policy is changed to conform to the Law, rule, regulation or standard.