

UFO MOVIEZ INDIA LIMITED

(CIN:L22120DL2004PLC164728)

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POLICY FOR DETERMINATION OF MATERIALITY OF EVENT OR INFORMATION

1. Introduction:

In accordance with the Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), UFO Moviez India Limited (the “**Company**”) has, *inter alia*, framed this policy for determination of materiality of event or information for the purpose of making disclosure of event or information to the stock exchanges under the Listing Regulations.

The Board of Directors of the Company (“**Board**”) has adopted the following policy for determination of materiality of event or information.

2. Title:

This Policy shall be called “Policy for determination of materiality of event or information”.

3. Determination of materiality:

The Company shall consider the following criteria for determination of materiality of events or information:

- (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) In case where the criteria specified in sub-clauses (a) and (b) 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 event / information is considered material.

4. Disclosure of event or information:

- (a) The Company shall make disclosure of any event or information to the stock exchanges in following manner:

- i. The Company shall, without any application of the guidelines for materiality as specified in sub-regulation (4) of regulation (30) of the Listing Regulations, disclose all the events as specified in Para A of Part A of Schedule III to the Listing Regulations to the stock exchanges on which the securities of the Company are listed.
 - ii. The Company shall, based on application of the guidelines for materiality as specified in sub-regulation (4) of regulation (30) of the Listing Regulations, disclose all the events as specified in Para B of Part A of Schedule III to the Listing Regulations to the stock exchanges on which the securities of the Company are listed.
 - iii. The Company shall also make disclosure of any other information/event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and 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 to the stock exchanges on which the securities of the Company are listed.
- (b) All events or information as specified in Part A of Schedule III under Regulation 30 of the Listing Regulations shall be first disclosed to the stock exchanges on which the securities of the Company are listed as soon as reasonably possible and not later than twenty four hours from the occurrence of event or information. Provided that in case the disclosure is made after twenty four hours of occurrence of the event or information, the Company shall, along with such disclosures provide explanation for delay. Provided further that disclosure with respect to events specified in sub-para 4 of Para A of Part A of Schedule III of the Listing Regulations shall be made within thirty minutes of the conclusion of the board meeting.
- (c) The Company shall also disclose all events or information with respect to subsidiaries which are material for the Company.
- (d) 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 it, the Company shall make adequate disclosures in regard thereof.
- (e) The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under Regulation 30 of the Listing Regulations, and such disclosures shall be hosted on the website of the Company for a minimum period of five years.
- (f) The Company shall, with respect to disclosures referred to in Regulation 30 of the Listing Regulations, make disclosures updating material developments on a regular basis, till such

time the event is resolved/closed, with relevant explanations.

- (g) Any two of the Key Managerial Personnel appointed under the Companies Act, 2013 is authorised to determine the materiality of an event or information and any one of the said Key Managerial Personnel is authorised to disclose such event or information to the stock exchange(s) under the Listing Regulations.
- (h) All such events or information which has been disclosed to stock exchange(s) under the Regulation 30 of the Listing Regulations, shall be simultaneously disclosed on the Company's website for a minimum period of five years.

5. 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.

6. Dissemination of Policy:

- (a) This Policy shall be disclosed on the website of the Company.
- (b) For all new Directors, a copy of this Policy shall be handed over as a part of the joining documentation.
- (c) For all existing Employees, a copy of this Policy shall be placed on HR-intra net portal.
