

ADVIK CAPITAL LIMITED

CIN: L65100DL1985PLC022505

**POLICY FOR DETERMINATION
OF MATERIALITY OF
INFORMATION AND EVENTS**

I. POLICY STATEMENT

The Company is Committed to being Open and transparent with all stakeholders and in disseminating information in a fair and timely manner as required, in pursuant to, Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, this Policy for Determination of Materiality of Information and Events has been formulated, approved and adopted by the board.

II. SCOPE AND OBJECTIVE

The Policy sets out the guidelines for identification of events or information within the Company which are deemed to be material in the opinion of the Board of Directors, based on the criteria specified.

This policy is framed as per requirements of the SEBI Listing Regulations for timely, adequate and accurate disclosure of information on an ongoing basis by the Company to enable investors to make well-informed investment decisions.

The objective of this Policy is to enable determination of information, events, occurrences, and developments relating to the Company which are material in nature warranting disclosure to the Stock Exchanges under the SEBI Listing Regulations.

III. COMPLIANCE OFFICER

The Company shall, from time to time, designate an key management personal of sufficient seniority, competence and independence as the compliance officer to ensure compliance with the provisions of this Policy (“Compliance Officer”) and the same shall be notified to the Designated Persons.

IV. DEFINITIONS

“**Act**” means the Companies Act,2013, as amended from time to time.

“**Applicable laws**” means Securities Laws, Listing Regulations and other laws and statutes applicable to the Company.

“**Authorised Person(s)**” means any of the following Key Managerial Personnel who shall determine materiality of events in accordance with the Policy i.e Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary and Compliance Officer.

“**Board**” means board of directors of the Company as constituted from time to time.

“**Company**” means Advik Capital Limited.

“Material Information” means information relating to such event, occurrence or development that is determined to be material in accordance with this Policy.

“Policy” or **“This policy”** means Policy for Determination of Materiality of Information and Events as amended from time to time.

“SEBI Listing Regulations” means SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, as amended

“Significant Transaction or Arrangement” shall mean any individual transaction or arrangement that exceeds or is likely to exceed 10% of the total revenues or total expenses or total assets or total liabilities, as the case may be, of the material unlisted subsidiary for the immediately preceding accounting year.

“Stock Exchanges” means the BSE Limited and National Stock Exchange of India Limited, and such other stock exchange where the securities of the Company may get listed.

“Subsidiary / Subsidiary Company” means a subsidiary as defined under Section 2(87) of the Companies Act, 2013 and the rules made thereunder. Where a listed holding Company has a listed subsidiary which is itself a holding Company, the above provisions shall apply to the listed subsidiary in so far as its subsidiaries are concerned.

“Year” means financial year.

Any other term not defined here in shall have the same meaning as defined in the Companies Act, 2013, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any other applicable law or regulation and as amended from time to time.

V. DETERMINATION OF MATERIALITY

- a) The events specified in Para A of Part A of Schedule III annexed to the SEBI Listing Regulations, shall be deemed to be material events/information and the disclosure of these events shall be made as soon as reasonably possible to the Stock Exchanges. These events have to be necessarily disclosed without applying any test of materiality;
- b) The Company shall make disclosure of events specified in Para B and C of Part A of Schedule III annexed to the SEBI Listing Regulations, based on application of the guidelines for materiality, as specified herein below in sub-clause(c).
- c) The Company shall consider the following criteria for determination of materiality of events/information:
 - The omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
 - 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;

- In case where the criteria specified in this sub-clause (c) are not applicable, an event/information may be treated as being material if in the opinion of the Authorised Person/Board, the event/information is considered material.

d) The Authorised Persons shall determine and finalize the contents of public disclosure. The management of the Company shall periodically bring to the attention of the Board, a statement of all Significant Transactions and Arrangements entered into by the unlisted subsidiary company.

VI. PROCESS OF THE DISCLOSURE

1. The Company shall disclose material information in accordance with the timelines prescribed under the SEBI Listing Regulations, except for reasonable time necessarily required for the purpose of determining materiality, and as permitted under applicable laws.
2. The Company shall, with respect to disclosures referred to in Regulation 30, make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.
3. All the material disclosures made by the Company under Regulation 30 of the SEBI Listing Regulations shall be uploaded on the website of the Company and shall be hosted there for such period as required under the applicable law at the relevant time.

VII. CONTACT DETAILS

In case of any clarification, any person may contact the Compliance Officer of the company at advikcapital@gmail.com.

VIII. MISCELLANEOUS

1. Any words used in this policy but not defined herein shall have the same meaning ascribed to it in the Articles of Association of the Company and /or the Companies Act, 2013 or Rules made there under.
2. In case of any doubt, ambiguity, dispute or difference arise out of the meaning/interpretation of any word or provision in this Policy, the same shall be referred to the Committee, if formed, otherwise board and the decision of such Committee/ Board in such case shall be final.
3. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and further the objective of good corporate governance.
4. This Policy shall come into force on the date it is approved by the Board of the Company. i.e. with effect from January 17, 2022.

IX. POLICY REVIEW AND AMENDMENTS

1. Company's Board will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness.
2. Company reserves the right to vary and/or amend the terms of this Policy from time to time.
3. Should there be any inconsistency between the terms of the Policy and the SEBI Listing Regulations, the provisions of the Listing Regulations shall prevail. Any amendments to the Listing Regulations shall mutatis mutandis be deemed to have been incorporated in this policy.

X. DISCLOSURES

The policy shall be disclosed in the website of the Company i.e www.advikgroup.com and such other places as may be required by the Act and rules framed thereunder, Equity Listing Agreement entered into with the stock exchanges (including any statutory modification(s) or reenactment thereof) and such other laws for the time being force.

XI. DISCLAIMER

1. The Policy does not in any way restrict the provisions of the Companies Act, SEBI Laws related rules and Regulations or any other statutory laws.
2. Given the aforementioned uncertainties, prospective or present investors are cautioned not to place undue reliance on any of the forward-looking statements in the Policy.

Annexure

Document Control Section

Document Name	
Abstract	
Security Classification	
Location	

Authorization

Document Author	Document Owner	Reviewed By	Approved By

Review and Amendment Log

Version	Modification Date	Section	Amendment/ Modification/Deletion	Brief Description of Change / Review