

TALBROS AUTOMOTIVE COMPONENTS LIMITED

SUBJECT:	POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF MATERIAL INFORMATION & EVENTS
INTRODUCTION	<p>Securities Exchange Board of India (SEBI) has notified SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 (hereinafter referred as "Listing Regulations") on September 02, 2015 effective from 1st December 2015.</p> <p>As per the requirement of the Listing Regulations, Talbros Automotive Components Limited (the 'Company' or 'TACL') has formulated this Policy to be called as TACL Policy on Determination of Materiality for Disclosure of Material Information & Events (herein after referred to as the 'Policy').</p>
OBJECTIVE & SCOPE	The objective of this policy is to lay down the procedure, practice and rules for determination of materiality of information and events to be followed in making disclosures of information and events to stock exchanges, its investors and other stakeholders.
POLICY OWNER:	The policy shall be approved and reviewed by the Board from time to time based on statutory regulations. Any of the Key Managerial Personnel (as defined under Companies Act, 2013) shall be authorized for the purpose of determining materiality of an event or information, making disclosures to stock exchange(s) and for effective implementation of the policy.
POLICY STATEMENT:	<p>Information's and events that may impact prices of the company materially shall be promptly made public and generally available and that uniform and universal dissemination of material information shall be followed to avoid selective disclosure.</p> <p>Company shall follow below guidelines for making disclosures of information and events:</p> <p>A : <u>Deemed Material Events :</u></p> <p>Events specified in Para A of Part A of Schedule III of Listing Regulation are deemed to be material events.</p> <p>The Company shall make disclosure of all deemed material events not later than twenty four hours from the occurrence of event or information or within 30 minutes of the closure of the meeting as prescribed.</p> <p>B : <u>Material Event based upon materiality</u></p> <p>Event specified in Para B of Part A of Schedule III of Listing Regulation shall be disclosed after applying criteria of materiality as specified here in below :</p> <p><u>Criteria for determination of materiality of events/ information:</u></p> <p>Authorized officer shall consider the following criteria for determination of materiality of events/ information:</p> <p>the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or</p> <p>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;</p> <p>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 the company, the event / information is considered material.</p> <p>C. Company shall also make disclosure of other information/event like 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. which is exclusively known to the company and 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.</p> <p>D. Without prejudice to the generality of para (A), (B) and (C) above, company shall disclose event/information as specified by the Board from time to time.</p>
OTHER GUIDELINES	1. The company shall also be guided by code for fair disclosure of unpublished price sensitive information for making information public.