

# WINMORE LEASING AND HOLDINGS LIMITED

Regd. Office: 'Ashiana', 69-C, Bhulabhai Desai Road, Mumbai – 400 026

Tel. No.: 022-23686617 E-mail Id: [ho@hawcoindia.com](mailto:ho@hawcoindia.com)

CIN: L67120MH1984PLC272432 Website: [www.winmoreleasingandholdings.com](http://www.winmoreleasingandholdings.com)

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## **Policy for Determining Materiality of Events or Information**

### I Background

In compliance with Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Regulations') the Company has framed a policy for determination of materiality of events and information for the purpose of making disclosure to the Stock Exchanges(s). This policy (updated) aims to ensure timely and adequate disclosure of all material and price sensitive information to the Stock Exchange(s).

### II Material events / Information

#### a) Events / Information deemed to be material:

As stated in Regulation 30(2) of the Regulations, events specified in Para A of Part A of Schedule III of the Regulations are deemed to be material.

#### b) Events / Information to be determined as material :

The Company shall make disclosures of event specified in Para B of Part A of Schedule III of the Regulation and shall consider the following criteria for determination of materiality of events/information:

1. The omission of an event or information which is likely to result in discontinuity or alteration of event or information already available publicly; or
2. 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
3. The omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
  - i) two percent of turnover, as per the last audited consolidated financial statements of the Company;
  - ii) two percent of net worth, as per the last audited consolidated financial statements of the Company, except in case the arithmetic value of the net worth is negative;
  - iii) five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company;

4. In case where the criteria specified in above 1, 2 and 3 are not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the Company, the event or information is considered material.

The Manager and the Company Secretary acting severally are authorized to determine materiality of such other event or information for making disclosure to the Stock Exchanges(s) as they may deem appropriate. [They can be contacted on e-mail id : [ho@hawcoindia.com](mailto:ho@hawcoindia.com), if required.]

The relevant employee of the Company shall assist to the Manager and Company Secretary in identifying any potential material event and information.

### III Modification of Policy

The Board of Directors of the Company may review, modify and or amend any or all clauses of this policy as may be deemed necessary.