



Growth, Wealth, Success

U. Y. Fincorp Limited

(Formerly Known as Golden Goenka Fincorp Limited)

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

This "**U. Y. -Policy for Determination of Materiality of Events or Information**" has been adopted by the Board of Directors of the Company at its meeting held on 28th March, 2019 and supersedes the earlier policy approved by the Board of Directors at their meeting held 13th November, 2015.

A. PURPOSE

The Securities and Exchange Board of India has issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI (LODR), 2015") on September 2, 2015 to be effective from December 1, 2015.

As per Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as SEBI Listing Regulations), a listed entity is required to frame a policy for determination of materiality for disclosure of events or information to Stock Exchanges, based on the criteria specified in Regulation 30 of the said Regulations and the same is also required to be disclosed on the Company's website.

Considering the requirements as prescribed under "SEBI (LODR), 2015", the Board of Directors of U. Y. Fincorp Limited ("the Company") has formulated this policy known as "**U. Y. -Policy for Determination of Materiality of Events or Information.**"

B. OBJECTIVE

The objective of this Policy is to serve as a guiding charter to the Management to ensure timely and adequate disclosure of events or information are made to the investor community by the Company under the Listing Regulations, to enable them to take well informed investment decisions with regard to the securities of the Company.

C. APPLICABILITY

Information relating to material events and which is price sensitive in nature, shall be promptly disseminated to the Stock Exchanges. For this purpose, material event means any information which relates to the Company and which, if published is likely to materially affect the price of shares of the Company.

- i. The Company shall make disclosure of events specified in Para A of Part A of Schedule III of the Listing Regulations, as may be amended from time to time, without applying any test of materiality to the stock exchanges within specified timelines.
- ii. The Company shall make disclosure of events specified in Para B of Part A of Schedule III of the Listing Regulations, as may be amended from time to time, based on application of the criteria for determination materiality as specified in sub-regulation (4) of Regulation 30 of the "SEBI (LODR), 2015".



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- iii. 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 shareholders of the Company to appraise its position and to avoid the establishment of a false market in such securities, would be disclosed as advised by the Board from time to time.
- iv. The Company shall make disclosures of any events or information which, in the opinion of the Board of Directors, is material. In case where an event occurs or information is available with the company, which has not been indicated in sub-para (i), (ii) and (iii) above, but which may have material effect on it, the Company would make adequate disclosures in regard thereof.

D. CRITERIA FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION

The Company shall consider the following criteria for determination of materiality of event /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.

Without prejudice to the generality of (a), (b) and (c) above, the Company may make disclosures of event/information as specified by the Board from time to time.

E. DISCLOSURE OF MATERIAL EVENTS / INFORMATION

The Company shall disclose to the stock exchanges of all events, specified in Para A of Part A of Schedule III or information as soon as reasonably possible and not later than 24 hours from the occurrence of the event/information. In the event the disclosure is made after 24 hours of occurrence of the event or information, the Company shall, along with such disclosures provide an explanation for such delay.

The disclosure with respect to events specified in sub-para 4 of Para A of Part A of Schedule III shall be made within thirty minutes of the conclusion of the board meeting.

The Company shall make disclosures updating the material developments pertaining to material events on a regular basis, till such time the event is resolved/closed, and to be disclosed to the stock exchanges with relevant explanations.

The Company shall also disclose all events or information with respect to subsidiaries which are material, if any, for the Company.



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F. AUTHORIZATION FOR DISCLOSURES

The Managing Director or Chief Executive Officer is authorized to determine materiality of an event/information and to make disclosures to stock exchanges.

Mr. Managing Director or Chief Executive Officer may authorise, either, the Company Secretary or the Chief Financial Officer of the Company to make necessary disclosures to the Stock Exchange with respect to specific event/ information.

The contact details of the person authorized to determine materiality of an event/information have been disclosed on Company's website.

G. MONITORING AND REVIEW

The Board of Directors of the Company will review the Policy as and when necessary and make suitable modifications, as may be required.

H. DISCLOSURE

This policy shall be disclosed on the website of the Company.

Date: 28.03.2019

Place: Kolkata

By order of Board

**Sd/-
Chairman**