

# **UNIVERSUS PHOTO IMAGINGS LIMITED**

## **POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS FOR DISCLOSURE TO STOCK EXCHANGES**

### **1. INTRODUCTION**

In pursuance of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), the Board of Directors of Universus Photo Imagings Limited (“the Company”) has approved a Policy for Determination of Materiality of Events for Disclosure to the Stock Exchanges (the Policy) where the securities of the Company are listed (“Stock Exchanges”).

### **2. CRITERION FOR DETERMINATION OF MATERIALITY**

The following criterion shall be considered for determination of materiality of events and information:

- a) The omission of an event or information 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 criterion specified in sub-clauses (a) and (b) above are not applicable, an event/ information may be treated being material, if in the opinion of the Board of Directors of the Company, the event or information is considered material.

### **3. MATERIAL EVENTS AND INFORMATION**

- 3.1 The events specified in Para A of Part A of Schedule III to the Listing Regulations shall be deemed to be material events for the purpose of disclosure to the Stock Exchanges, without application of materiality criterion given in clause 2 above.
- 3.2 The events and information conforming to the materiality criterion given in clause 2 shall be considered material for the purpose of disclosure to the Stock Exchanges in terms of Regulation 30(3) of the Listing Regulations.
- 3.3 The Company shall also disclose any other event or information to the Stock Exchanges which is considered material by the Board of Directors of the Company.
- 3.4 The aforesaid events and information shall be disclosed to the Stock Exchange in the manner and within the time frame as prescribed under the Listing Regulations.
- 3.5 The Company shall disclose all such events or information which has been disclosed to stock exchange(s) under this regulation on its website, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company.
- 3.6 The Company shall disclose all events or information with respect to its subsidiaries which are material for the Company.

### **4. AUTHORITY**

- 4.1. The Board of Directors of the Company has authorized the Whole Time Director, Chief Executive Officer, Chief Operating Officer, Chief Financial Officer and Company Secretary, any two of them acting jointly, to determine the materiality of any event/ information (including that of its subsidiaries) for the purpose of disclosure to the Stock Exchanges.
- 4.2 Normally, the Company Secretary shall make necessary disclosures of events or information to the Stock Exchanges under Regulation 30 of Listing Regulations. However, such disclosures can also be made either by Chief Executive Officer, Chief Operating Officer, Chief Financial Officer or Whole-Time Director of the Company.