

HOTEL RUGBY LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF ANY EVENT OR INFORMATION REQUIRED TO BE DISCLOSED TO THE STOCK EXCHANGE(S)

1. The Securities and Exchange Board of India has notified the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, (“Regulations”) which will come into effect from December 1, 2015. Regulation 30(4)(ii) of the Regulations requires that every listed Company should frame a Policy for determination of materiality, based on criteria specified in sub-regulation 4 of Regulation 30, stated herein below:
 - (a) The omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly;
 - (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, the event / information is considered material.
2. The materiality of any event/information shall be determined by the Chairman and Chief Executive Officer, Mr. Mahendra R. Thacker or the Chief Financial Officer, Mr. Rajesh S. Parikh. The Chief Financial Officer, Rajesh S. Parikh is authorised to make disclosures of material events/information as directed by them to BSE Ltd.
3. Any amendment in this policy may be carried out with the approval of the Board of Directors of the Company.

In case any amendment(s), clarification(s), circular(s) and guidelines issued by the Securities Exchange Board of India/ Stock Exchange(s), that is not consistent with the requirement specified under this Policy, then the Policy shall stand amended accordingly effective from date as laid down under such amendment(s), clarification(s), circular(s) and guidelines. Such amendment shall be brought to the attention of the Board of Directors at its meeting held thereafter.