

GLOBAL SURFACES LIMITED

**POLICY ON DETERMINATION OF MATERIALITY OF EVENTS /
INFORMATION**

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DISCLOSURE ON MATERIAL EVENTS / INFORMATION

1. Introduction

As per Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), a listed entity is required to frame a policy for determination of materiality of events or information which are required to be disclosed to the Stock Exchanges.

2. Purpose

The purpose of this Policy is to determine materiality of events and information and to ensure that the Listed entity shall make disclosure of events / transaction/ information specified in para A and B of Part A of Schedule III of the Listing Regulations to the Stock Exchanges.

3. Authority

This Policy has been approved by the Board of Directors of Global Surfaces Limited (“the Company”). The Policy shall also be displayed on the website of the Company.

4. Criteria for determination of materiality of event or information under the Listing Regulations

The Listing Regulations lay down the following criteria for determining the materiality of event or 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;
- (b) the omission of an event or information, which is likely to result in significant market reaction, if the said omission came to light at a later date;
- (c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
 - (1) two percent of turnover, as per the last audited consolidated financial statements of the listed entity;
 - (2) two percent of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;

- (3) 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 listed entity;
- (d) In case where the criteria specified in sub-clauses (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the listed entity, the event or information is considered material.

5. Guidelines for determination of materiality of event or transaction or information

- (a) The Company shall disclose all the events as listed in Para A of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended from time to time) shall be disclosed without application of the criteria as per clause 4.
- (b) The Company shall disclose all the events as listed in Para B of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended from time to time) shall be disclosed after determining materiality criteria as per clause 4.
- (c) The company shall disclose all such events or information in the following manner:
- i) inform the stock exchanges on which the securities of the Company are listed;
 - ii) upload on the company website of the Company;
 - iii) updating Material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations;
 - iv) The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this policy , 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, as disclosed on its website;
 - v) The Company shall disclose all events or information with respect to its Subsidiaries which are material for the Company;

6. Authorization for determination of materiality of event or transaction or information

The board of directors of the Company have authorized the following key managerial personnel for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) under the Listing Regulation and the contact details of such personnel are as under:

Sr. No.	Name	Designation	Email address	Contact Number
1.	Mr. Mayank Shah	Chairman and Managing Director	mayank@gloalsurfaces.in	Address: Plot No. PA10-006 Engineering and Related Industries SEZ, Mahindra World City Tehsil-Sanganer Jaipur - 302 037, Rajasthan Telephone: 0141- 7191000
2.	Mr. Dharam Singh Rathore	Company Secretary and Compliance Officer	cs@globalsurfaces.in	

7. Review & Amendment

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant legislation and remains effective. The board has the right to change/amend the policy as may be expedient taking into account the law for the time being in force.