

ASIAN HOTELS (EAST) LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS

Preamble

In terms of Regulation 30, Schedule III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 [Listing Regulations] (effective from 1st December, 2015) read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 9th September, 2015, every listed company shall frame a policy for determination of materiality of events based on the criteria specified in the Listing Regulation. The Board of Directors of Asian Hotels (East) Limited ('the Company') at its meeting held on 30th October, 2015 has adopted this policy for determination of materiality of events in view of the requirement of aforesaid Listing Regulations.

Policy

The objective of this policy is to ensure timely and adequate disclosure of material events pursuant to the above legal provisions in order to enable investors to make well-informed investment decisions.

Procedure

- 1) The Company shall make disclosures of material events/any updates/development along with prescribed details specified in Para A of Part A of Schedule III of Listing Regulations read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 9th September, 2015.
- 2) The Company shall make disclosures of events/any updates/development specified in Para B of Part A of Schedule III of Listing Regulations read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 9th September, 2015. The same shall be disclosed based on application of the guidelines for materiality as specified in Listing Regulations.
- 3) The Company shall make disclosure of events which are not specified in Para A or Para B of Part A of Listing Regulations but the same is considered material in the opinion of the Board after considering the criteria for determination of materiality of events.
- 4) The Board of Directors of the Company has authorized Joint Managing Directors for the purpose of determining materiality of events. The Board has also authorized the Chief Legal Officer & Company Secretary for the purpose of making disclosures to stock exchange(s) with contact details which shall be disclosed to the stock exchanges and as well as on the Company's website. The Board has also authorized the Chief Legal Officer & Company Secretary to confirm or deny any reported event to stock exchange(s) in consultation with Joint Managing Directors.
- 5) The Company shall disclose to stock exchange(s) of all events specified in Para A of Part A of Schedule III of Listing Regulations as soon as reasonably possible and not later than 24 hours from the occurrence of events. In case the disclosure is made after 24 hours from the occurrence of events, the Company shall along with disclosures provide explanation for delay. The disclosure with respect to material events specified in sub-para 4 of Para A of Part A of Schedule III of Listing Regulations as an outcome of Board meeting shall be made within 30 minutes of the conclusion of the Board meeting.
- 6) The Company shall disclose all material events with respect to subsidiaries of the Company.



Disclosure & Reporting

This policy shall be disclosed in the Company's website. All such events or information which has been disclosed to stock exchange(s) shall be hosted on the Company's website for a minimum period of 5 years.

Review and Amendment

The Board may, subject to applicable Listing Regulations review and amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.

