

## **EIH ASSOCIATED HOTELS LIMITED**

### **POLICY FOR DETERMINATION AND DISCLOSURE OF MATERIAL EVENTS**

#### **1. Statutory Mandate**

The Board of Directors (The ‘Board’) of EIH Associated Hotels Limited (“the Company”/ “EIHA”) has adopted the following policy and procedures with regard to disclosure of material events which are necessary to be disclosed to the Stock Exchanges based on criteria as may be deemed necessary and has been adopted as part of this policy. The Board may review this policy from time to time.

This policy will be applicable to the Company with effect from 1<sup>st</sup> December, 2015 in terms of Regulation 30 of Chapter IV of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

#### **2. Policy Objective and Scope**

To determine the events and information which is in the opinion of the Board are Material and needs to be disclosed to the Stock Exchanges as per the time span hitherto defined.

The policy is intended to define EIHA’s policy on disclosure of events / information and to provide guidance to the Board of Directors, KMPs and other executives working in the Company in making decisions and undertaking regarding its responsibility about making public such events/ information which may materially affect the performance of the Company and thereby the share price of the Company.

The policy is framed for the purpose of systematic identification, categorization, review, disclosure and updation of website the details of information/events which are considered material or not but which may have a bearing on the performance of the Company and which may materially affect the share price of the company.

- 3.** All the words and expressions used in this Policy, unless defined hereinafter, shall have the meaning respectively assigned to them under the Listing Regulations and in the absence of its definition or explanation therein, as per the Companies Act, 2013 and the Rules, Notifications and Circulars made/issued there under, as amended from time to time.

#### 4. Policy

This Policy for determination of materiality of events and information for disclosure to the Stock Exchanges (hereinafter referred to as ‘the Disclosure Policy or this/the Policy’) is framed in terms of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as the “Listing Regulations”).

A. The following will be disclosed to the Stock Exchanges any time after the decision is taken or approval is granted but not later than 30 minutes of the conclusion of the meeting of the Board of Directors of the Company (hereinafter referred to as the ‘Board’):

- (i) Approval of financial results;
- (ii) Recommendation of dividend to the shareholders or declaration of interim dividend, including the date of payment of dividend recommended/declared;
- (iii) Decision not to recommend a dividend;
- (iv) Approval/recommendation to the shareholders regarding fund raising proposal through issue of securities or acceptance of deposits from the members/public;
- (v) Recommendation to the shareholders for issue of bonus shares and related information;
- (vi) Approval/recommendation to the shareholders for buy back of securities;
- (vii) Approval of forfeiture of securities, re-issue of forfeited securities or alteration of call(s) on securities;
- (viii) Recommendation to the shareholders for alteration of share capital;
- (ix) Approval/recommendation to the shareholders for voluntary delisting of the Company’s securities from one or more Stock Exchange(s);

B. The information covered by this Policy shall include “information related to the Company's business, operations, or performance which has a significant effect on securities investment decisions” (hereinafter referred to as “material

information”) that the Company is required to disclose in a timely and appropriate manner by applying the guidelines for assessing materiality. Events or information specified in Para B of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed based on application of materiality criteria. Events or information specified in Para A of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed without any application of the guidelines for materiality.

- C. Materiality will be determined on a case to case basis depending on the facts and the circumstances pertaining to the event or information.

The following criteria will be applicable for determining materiality of event or information:

- a. The omission of an event or information which is likely to:
  - i. result in a discontinuity or alteration of an event or information already available publicly; or
  - ii. result in significant market reaction if the said omission came to light at a later date;
- b. The omission of an event or information, whose value or the expected impact in terms of value exceeds the lower of the following:
  - i. two percent of turnover, as per the last audited financial statements of the Company; or
  - ii. two percent of net worth, except in case of the arithmetic value of the networth is negative, as per the last audited financial statements of the Company;
  - iii. five percent of the average of absolute value of profit or loss after tax, as per the last three audited financial statements of the Company.

Accordingly, any transactions exceeding the lower of i, ii or iii above, with an annual impact in value, will be considered for the above purposes.

5. Where the Company makes disclosures to the Stock Exchanges under Clause (A), (B) or (C) above, the Company will also disclose material development(s) on the said event/information.

6. The Company will also disclose to the Stock Exchanges, with respect to its Subsidiaries, if any, events and information which are material for the Company.
7. The Directors *viz*: Chairman, Managing Director, Chief Financial Officer and Company Secretary are authorised, singly, to determine the materiality of an event/ information in terms of this Policy. Based on such determination of material events / information and where material events/ information are deemed material in terms of the listing regulations and prescribed in this policy. Any of the above mentioned person are severally authorized to make appropriate disclosures, whatever required to the Stock Exchanges.
8. The Disclosure Policy will be posted on the Company's website [www.eihassociatedhotels.in](http://www.eihassociatedhotels.in) and events & information disclosed to the Stock Exchanges in terms of this Policy will also be kept posted on the website for at least five years from the date such event/information is posted.

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### **Version**

<b>Date</b>	<b>Version / Amendments</b>
29.01.2016	Original Policy adopted
07.08.2023	Amended to incorporate the amendment in the provision of SEBI Listing Regulations