

CUBICAL FINANCIAL SERVICES **LIMITED**

POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENT OR INFORMATION

PREAMBLE

The objective of this policy for determination of materiality for disclosure of event or information (“policy”) is to fix criteria for determination of materiality of events or information in relation to Cubical Financial Services Limited (“Company”) to ensure timely and adequate disclosure of material events/information to the stock exchanges.

The Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), under its regulation 30(4)(ii) requires every listed entity to formulate a policy for determination or materiality of an event or information for the purpose of making disclosures to the stock exchanges and such policy is required to be disclosed on the Company’s website. Further Para B of Part A of schedule III of the Listing Regulations provides a list of events for which the disclosures have to be made to the stock exchange based on application of certain guidelines on materiality prescribed under the Listing Regulations.

Considering the aforesaid requirements, the company has formulated this policy for determining materiality of an event or information for the purpose of disclosures to be made by the company to the stock exchanges.

The policy shall be read out together with Code of practices and procedure for fair disclosure of Unpublished Price Sensitive Information formulated under the Securities and Exchange Board of India (Prohibition of Insider Trading), Regulations, 2015.

CRITERIA FOR DETERMINATION OF MATERIALITY OF EVENTS/INFORMATION

The Company shall consider the following criteria for determination of materiality of an event / information:

- i. the omission of an event or information which is likely to result in discontinuity or alteration of event or information already available publicly; or
- ii. 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 ;

- iii. the omission of an event or information, whose value or the expected impact in terms of value, exceeds the thresholds prescribed under the SEBI Listing Regulations and/or other Applicable Laws, as may be amended from time to time.
- iv. In case in sub-clauses(i) and (ii) are not applicable,an event/information may be treated as being material if in the opinion of the board of directors of the company,the event information is considered material.

TIMELINES FOR DISCLOSURE OF MATERIAL EVENTS/INFORMATION

The Company shall disclose to the Stock Exchanges of all events or information that are required to be disclosed under this Policy and/or as specified in Regulation 30 of SEBI Listing Regulations **as soon as reasonably possible and in any case not later than the timelines specified under Regulation 30(6) of SEBI Listing Regulations.**In the event the disclosure is made after the timelines specified above, the Company shall, along with such disclosures provide an explanation for such delay.

In case an event or information is required to be disclosed by the Company in terms of the provisions of Regulation 30 of SEBI Listing Regulations pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

The Company shall make disclosures updating the material developments pertaining to material events on a regular basis, till such time the event is resolved/closed, and to be disclosed to the Stock Exchanges with relevant explanations, if required.

All the disclosures made to the Stock Exchanges under this Policy shall also be placed on the Company’s website and the same shall be available for a minimum period as specified under SEBI Regulations and there after archived in accordance with the Company’s Archival Policy.

DISCLOSURES TO THE STOCK EXCHANGE

The Chairman and Managing Director and the Chief Financial Officer (“**Authorized Officials**”) of the Company are severally authorized for determining the “materiality of an event or information” and for making disclosures to the Stock Exchanges. Further, the Chairman and Managing Director, Chief Financial Officer and the Company Secretary of the Company are severally authorized for making disclosures to the Stock Exchanges. The Contact details of the above Officials are as follows-

S No.	Name of the KMPs	Designation	Contact Details
1.	Mr. Ashwani Kumar Gupta	Managing Director	9871917757 cubfinser@yahoo.com
2.	Mr. Prakash Chand Sharma	Chief Financial Officer	9891612680

			cubfinser@yahoo.com
3.	Ms. Ruchi	Company Secretary	9310266044 cubfinser@yahoo.com

OBLIGATIONS OF INTERNAL STAKEHOLDERS AND KMP FOR DISCLOSURE

Any potential material event or information, including the information specified in Para A, Para B and Para C of Part A of Schedule III of the SEBI Listing Regulations shall be forthwith informed to the Authorized Officials, Chief Financial Officer and the Company Secretary, upon occurrence, with adequate supporting data/information, to facilitate accessing and ascertaining the materiality of the event or information and to make appropriate disclosure to the Stock Exchanges as per the guidelines mentioned in this Policy.

AMENDMENTS/MODIFICATIONS

Any change in the policy necessitated due to subsequent changes in the provisions of the Companies Act, 2013 or the listing regulations or any other applicable law shall be incorporated to give effect to such changes without any further act by the Board of Directors of the Company and any two of the directors or the company secretary shall be authorised to give effect to such changes.