

**POLICY FOR DETERMINATION OF MATERIALITY OF EVENT / INFORMATION**  
**SOFTSOL INDIA LIMITED**

**1. Preface**

The Board of Directors (the “Board”) of SOFTSOL INDIA LIMITED (the “Company”) has adopted this Revised ‘Policy for Determination of Materiality of Event/ Information’ of the Company (revised policy is applicable from 13/08/2021) with regard to determination of materiality of events or information. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) mandate listed entities to formulate a ‘Policy for Determination of Materiality of Event/ Information’ (“the Policy”) that warrant disclosure to investor. It is in this context that the Policy is being framed and implemented.

**2. Objective**

The event / information covered by this Policy shall include “information related to the Company’s business, operations or performance which has a significant impact on securities investment decisions” (hereinafter referred to as “material event / information”) that the Company is required to disclose in a timely and appropriate manner by applying the guidelines for assessing materiality.

The events/ information specified in Para A of Part A of Schedule III of the Listing Regulations are deemed to be material events and the Company shall make disclosure of such events. The list specifying such events is provided in **Annexure I** of this Policy. Further, the events/ information specified in Para B of Part A of Schedule III of the Listing Regulations, based on the extent of applicability of such events on the Company, shall be considered as material based on the below given thresholds. The list specifying such events is provided in **Annexure II** of this Policy.

**3. Guidelines for Assessing Materiality**

- i. The omission of an event or information which is likely to result in discontinuity or alteration of event or information already available publicly.
- 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. In case where the criteria of an event / information does not fall in the first two categories, but still in the opinion of the Board of Directors are considered material.

Events specified in Annexure A to this Policy are deemed to be material events and the Company shall make disclosure of such events as soon as reasonably possible but in any case not later than 24 hours from the occurrence of event or information. In case the disclosure is made after 24 hours of the occurrence of event or information, the Company shall provide an explanation for delay.

Events specified in Clause 4 of Annexure A shall be disclosed to the stock exchanges within 30 minutes of the conclusion of the Board meeting.

Events specified in Annexure B to this Policy shall be disclosed based on the application of criteria of materiality as mentioned above.

#### **4. Authority for determining materiality and dissemination of the Information hereunder**

The following Key Managerial Personnel(s) are authorised to determine whether an event or information is material and for the purpose of making appropriate disclosure on a timely basis to Stock Exchange(s).

- a) **Determination of Materiality of Event:** The Whole time Director (WTD), the Chief Financial Officer (CFO) and Company Secretary (CS) are severally authorized to determine materiality of an event/information under this Policy.
- b) **Making disclosures to stock exchange(s):** The Whole time Director (WTD) of the Company is authorized to disseminate information and disclosure of Material Events/Information to the Stock Exchange(s).

#### **5. Amendment(s)**

Any change(s) in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.