



## **REGANTO ENTERPRISES LIMITED**

**(formerly Known Vintron Informatics Limited)**

**CIN: L43299DL1991PLC045276**

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**(Policy on determination of Materiality of Event or  
Information)**

## **OBJECTIVE**

This Policy is framed pursuant to Regulation 30(4) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The objective of the Policy is to determine the materiality of event or information of the Company, apart from those events which are already specified in Para A of Part A of Schedule III of the Regulations, so that such event or information can be promptly disclosed to the stock exchange(s).

The Policy sets out the guidelines for identification of events or information within the Company which are deemed to be material in the opinion of the Board of Directors. Policy will ensure that Company complies with disclosure obligations under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

## **DEFINITIONS**

“**Act**” shall mean the Companies Act, 2013 and the Rules framed there under, including any modifications, clarifications, circulars or re-enactment thereof.

“**Board of Directors**” means the Board of Directors of Regent Enterprises Limited, as constituted from time to time.

“**Company**” means Reganto Enterprises Limited.

“**Key Managerial Personnel**” mean key managerial personnel as defined in sub section (51) of Section 2 of the Act;

“**Material Event**” or “**Material Information**” shall mean such event or information as may be determined based on the guidelines provided in the Regulations or as may be determined in terms of guidelines for determining materiality of event or information of the Policy. In the Policy, the words, “material” and “materiality” shall be construed accordingly.

“**Policy**” means this Policy providing guidelines for determining materiality of event or information and as may be amended from time to time.

“**Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactments thereof.

## **GUIDELINES FOR DETERMINING MATERIALITY OF EVENT OR INFORMATION**

Events or information specified in Para A of Part A of Schedule III of the Regulations are required to be disclosed irrespective of application of any quantitative or qualitative materiality thresholds as these are “deemed” to be material.

In order to determine whether a particular event/information is material in nature as per Regulation 30(4) of the Regulations, the Company may consider the 'quantitative' and/or 'qualitative criteria(s) mentioned below:

(a) Quantitative:

Where the value involved or the impact exceeds 10% of the gross turnover or 10% of the net worth of the Company as per the last audited financial statements; (the lower of the two thresholds shall be taken as the trigger);

(b) Qualitative:

Omission of which is likely to:

- o result in a discontinuity or alteration of event or information already available publicly; or
- o result in significant market reaction if the said omission came to light at a later date

The 'qualitative' test may always be applied to determine materiality, even in circumstances where the 'quantitative' tests thresholds are not met or the 'quantitative' test is otherwise not applicable.

Apart from the above mentioned criteria, any other event/information which is considered as being material in the opinion of the Board of Directors of the Company shall be promptly disclosed to the stock exchange(s).

### **AUTHORITY TO THE KEY MANAGERIAL PERSONNEL**

The Managing Director/Whole-time Director/Chief Executive Officer & Company Secretary shall jointly and/or severally have the authority to determine the materiality of any event or information and ensure disclosure of the same is made to the stock exchange(s).

### **SCOPE AND LIMITATION**

In the event of any conflict between the provisions of this Policy and the Listing Regulations; Act; Regulations or any Statutory enactments; rules; the provisions of such Listing Regulations; Act or Regulations or any Statutory enactments, rules shall prevail over this Policy and the part (s) so repugnant shall be deemed to severed from the policy and the rest of the Policy shall remain in force.

This Policy shall be hosted on the website of the Company and the address of such web link shall be provided in the Annual Report of the Company.

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