

ROBUST HOTELS 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 (effective from 1st December, 2015) read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 9th September, 2015 and SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2023, ["LODR Regulations"] 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 Robust Hotels Limited ('the Company') has adopted this policy for determination of materiality of events in view of the requirement of aforesaid Regulations.

The amendment to this policy has been adopted by the Board of Directors at its meeting held on 09th August, 2023 in view of the SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2023.

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 LODR Regulations as may be amended from time to time.
- 2) The Company shall make disclosures of events/any updates/development specified in Para B of Part A of Schedule III of LODR Regulations as may be amended from time to time. The same shall be disclosed based on application of the guidelines for materiality as specified in LODR Regulations.
- 3) The Company shall make disclosure of events which are not specified in Para A or Para B of Part A of LODR 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 Company shall consider the following criteria for determination of materiality of events/information:
 - a) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
 - b) 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; [or]
 - c) 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 consolidated financial statements of the listed entity;
 - ii. two percent of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;
 - iii. five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company;

In case where the criteria specified in sub-clauses (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the board of directors of the Company, the event or information is considered material

- 5) The Board of Directors of the Company has authorized Vice President & CFO for the purpose of determining materiality of events. The Board has also authorized the Company Secretary & Compliance officer 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 Company Secretary & Compliance officer to confirm or deny any reported event to stock exchange(s) in consultation with Vice President & CFO.
- 6) The Company shall first disclose to stock exchange(s) of all events or information which are material in terms of the provisions of LODR Regulations as soon as reasonably possible and in any case not later than the following:
 - 30 minutes from the closure of the Meeting of Board of Directors in which the decision pertaining to the event or information is taken;
 - 12 hours from the occurrence of the event or information, in case the event or information is emanating within the Company;
 - 24 hours from the occurrence of the event or information, in case the event or information is not emanating within the Company.Provided that disclosure with respect to events for which timelines have been specified in Part A of Schedule III shall be made within such timeline
- 7) In case the disclosure is made after the timelines specified in the LODR Regulations, the Company shall along with disclosures provide explanation for delay.

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 LODR 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.
