

TIRUPATI FINLEASE LIMITED

POLICY FOR DETERMINING THE MATERIALITY OF EVENT

Preamble:

- The Securities and Exchange Board of India has issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") on September 2, 2015 to be effective from December 1, 2015.
- Regulation 30 of these Listing Regulations deals with disclosure of material events by the listed entity specified under Part A of Schedule III of the Listing Regulations and mandates every Listed Company to frame and disclose on its website a Policy for determination of materiality of events or information.

Objective:

- This Policy for Determination of Materiality of Events or Information (the "Policy") is framed to define events or information which is considered deemed material and lay down criteria of materiality for other events or information. Any material event or information shall be disclosed to the Stock Exchanges as per the Listing Regulations.

Criteria of Materiality:

- Events or Information relating to material events and which is price sensitive in nature, shall be promptly disclosed to the Stock Exchanges. For this purpose, material event means any information which relates to the Company and which, if published is likely to materially affect the price of shares of the Company.

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- The Company shall make disclosure of events specified in Annexure 1 (Events specified in Para A of Part A of Schedule III of the Listing Regulations and as may be amended from time to time), without applying any test of materiality to the stock exchanges within specified timelines.
- The Company shall make disclosure of events specified in Annexure 2 (Events specified in Para B of Part A of Schedule III of the Listing Regulations and as may be amended from time to time), based on application of the following criteria of materiality, to the stock exchanges within specified timelines, as specified below:
 - (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;
 - (c) In case where the criteria specified in sub-clauses (a) and (b) are not applicable, an event/information may be treated as being material if in the opinion of the Board of Directors of company, the event / information is considered material.

DISCLOSURES OF EVENTS OR INFORMATION

- The Company shall make disclosures of any events or information which, in the opinion of the Board of Directors, is material. In case where an event occurs or information is available with the company, which has not been indicated in Annexure-1 and 2, but which may have material effect on it, the Company would make adequate disclosures in regard thereof, information in the following manner:

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- (a) inform the stock exchanges in which the securities of the Company are listed;
 - (b) upload on the corporate website of the Company.
- The Company shall make disclosures updating Material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.
 - The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information and on its own initiative. Further it shall confirm or deny any event or information to stock exchange(s) reported in the media.
 - In case where an event occurs or information is available with the Company, which has not been indicated in Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, but which may have material effect on it, the Company will make adequate disclosures in regard thereof.