



RAUNAQ EPC INTERNATIONAL LIMITED

POLICY ON CRITERIA FOR DETERMINING MATERIALITY OF EVENTS

1. OBJECTIVE:

This Policy has been framed in accordance with the requirements of the Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Regulations").

The objective of this Policy is to determine materiality of events or information related to the Company and to ensure that such information is adequately disseminated in pursuance with the Regulations and to provide an overall governance framework for such determination of materiality.

EFFECTIVE DATE

The Policy as approved by the Board of Directors shall be effective from December 01, 2015.

2. DEFINITIONS:

"Act" shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof;

"Board of Directors" or **"Board"** shall mean the Board of Directors of Bharat Gears Limited, as constituted from time to time;

"Company" shall mean Raunaq EPC International Limited;

"Key Managerial Personnel" shall mean the key managerial personnel as defined under sub-section (51) of Section 2 of the Companies Act, 2013;

"Listing agreement" shall mean an agreement entered into between the Company and the Stock Exchanges where the securities of the Company are listed pursuant to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

"Material Event" or **"Material Information"** shall mean such event or information as set out in the Schedule or as may be determined in terms of Clause 3 of this Policy. In this Policy, the words, "material" and "materiality" shall be construed accordingly;

"Material Subsidiary" shall mean a subsidiary, whose income or net worth exceeds ten percent of the consolidated income or net worth respectively, of the Company and its subsidiaries in the immediately preceding accounting year.

"Policy" shall mean this Policy on criteria for determining Materiality of events or information and as may be amended from time to time;