

**EAST WEST HOLDINGS LIMITED**  
(Formerly Bullish Bonds & Holdings Ltd)

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**POLICY FOR DETERMINATION OF MATERIALITY  
OF EVENT / INFORMATION**

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# POLICY FOR DETERMINATION OF MATERIALITY OF EVENT / INFORMATION

## 1. INTRODUCTION

This policy for determination of materiality of event / information has been framed and adopted by “**East West Holdings Limited**” in compliance with the requirements of Regulation 30 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

Regulation 30 (4) of the Listing Regulations requires every listed Company to frame a policy for determination of materiality of events or information for disclosure, based on the criteria specified therein.

## 2. OBJECTIVE OF THE POLICY

The objective of this Policy is to serve as a guiding charter to the management to ensure that timely and adequate disclosure of events or information are made to the investor community by the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, to enable them to take well informed investment decisions with regard to the securities of the Company.

## 3. DEFINITIONS:

- a. “**Act**” means the Companies Act, 2013 and the rules framed thereunder, including any modification or re-enactment thereof.
- b. “**SEBI Listing Regulations**” means SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, as amended from time to time.
- c. “**Board**” or “**Board of Directors**” shall mean the Board of Directors of the Company.
- d. “**Company**” means EAST WEST HOLDINGS LIMITED.
- e. “**Key Managerial Personnel**” or “**KMP**” shall have the meaning as defined in the Companies Act 2013 and as amended from time to time.
- f. “**Subsidiary**” shall be as defined under the Act and the rules made thereunder.

## 4. EVENTS WHICH ARE DEEMED TO BE MATERIAL EVENTS:

The Company shall disclose all such events which are specified in Para A of Part A of Schedule III of the Listing Regulations (as applicable from time to time) without any application of the guidelines for materiality as specified in sub-regulation (2) of Regulation 30 of the Listing Regulations.

## 5. DISCLOSURE OF EVENTS OR INFORMATION

- i. The events or information specified in Para A of Part A of Schedule III of the Listing Regulations will be disclosed without the application of any materiality thresholds, as these are “deemed” to be material events.
- ii. The events or information specified in Para B of Part A of Schedule III of the Listing Regulations will be disclosed based on application of the materiality criteria, as laid out in the Policy below.
- iii. In addition to the above, Paras C and D of Part A of Schedule III of the Listing Regulations mandate disclosure of the following:

- major developments that are likely to affect business
- any change in accounting policies that may have a significant impact on the accounts of the Company;
- any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities; and
- any other disclosures as may be specified by SEBI from time to time.

**6. GUIDELINES FOR IDENTIFICATION OF SUCH EVENT / INFORMATION, WHICH IS MATERIAL, IN THE OPINION OF THE BOARD:**

a) The events/ information as set out in Para B of Part A of Schedule III of the Listing Regulations, will be disclosed to the stock exchange, as soon as reasonably possible, but not later than 24 hours from the occurrence of such event/ information, if the estimated impact of such event/ information:

- exceeds 10% of Total Revenue or
- exceeds 10% of the total net worth, whichever is lower,

Total Revenue/ net worth shall be based on the latest audited consolidated annual financial statements of the Company for the previous year.

Provided that in case the disclosure is made after 24 hours of occurrence of the event or information, the Company shall, along with such disclosures, provide explanation for the delay.

b) In the event the materiality threshold indicated above cannot be applied to a particular event and/or information, the Company shall assess materiality based on the following criteria:

- i. the omission of disclosure of a particular event or information is likely to result in discontinuity or alteration of event or information already available publicly;
- ii. the omission of disclosure of a particular event or information is likely to result in significant market reaction if the said omission came to light at a later date; or
- iii. In case 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, the event / information is considered material.

c) Any other information/event, viz. major development that is likely to affect business, any change of accounting policy that may have a significant impact on the accounts, and any other information which is exclusively known to the Company, which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities.

d) Any information/ events with respect to subsidiary of the Company which are material for the Company shall also be disclosed to the relevant stock exchange.

e) It is clarified that as regard any event / information, only such impact which is direct and perceivable, and not remote, shall be considered.

f) In addition to the above, the Company may make voluntary disclosures of events/information, as may be specified by the Board or by SEBI from time to time.

**7. ROLES AND RESPONSIBILITIES OF KEY MANAGERIAL PERSONNEL FOR DETERMINING MATERIALITY OF AN EVENT OR INFORMATION AND MAKING DISCLOSURE TO STOCK EXCHANGES:**

In terms of the Listing Regulations, the Board has authorised the following key managerial personnel of the Company are designated as the “**Authorised Persons**” for the purposes of determining materiality of an event or information as per the guidelines contained under this Policy and the Listing Regulations, and for the purposes of disclosing such event / information to the stock exchanges:

- i. Managing Director,
- ii. Chief Executive Officer,
- iii. Chief Financial Officer and
- iv. Company Secretary

The materiality of events outlined above are indicative in nature. There may be a likelihood of some unforeseen events emerging due to the prevailing business scenario from time to time. Hence, the relevant Authorized Person should exercise his/her own judgement while assessing the materiality of events associated with the Company. In case the relevant Authorized Person perceives any doubt regarding materiality he/she may consult Chairman or any other Director before disclosing the information to the Stock Exchange(s).

**8. AMENDMENT/REVIEW OF THE POLICY**

The Board of Directors reserves the power to review and amend this policy from time to time as may be deemed necessary as per any regulatory amendments. In the event of any conflict between the provisions of this Policy and of the Act or Regulations or any other statutory enactments, rules, the provisions of such Act or Regulations or statutory enactments, rules shall prevail over this Policy.

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