



TOWER INVESTMENT & TRADING CO. LTD.

CIN: L67120WB1981PLC033500; GST No.: 19AABCT1076F1ZF

Registered Office :

‘Temple Chambers’ 6, Old Post Office Street, 4th Floor, Kolkata-700 001

Phone No.: 033 2230-7373/2248-3854

E-mail: tower_investment@yahoo.com; Website: www.tower.net.in

THE COMPANY’S POLICY FOR DETERMINATION OF MATERIALITY OF EVENT / INFORMATION.

1.PREAMBLE:

1.1 This Policy shall be called “Policy for Determination of Materiality of Event / Information (hereinafter referred to as the “the Policy”).

1.2 The policy has been framed in compliance with the provisions of Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”).

2.OBJECTIVE OF THE POLICY:

2.1 The objective of this policy is to ensure continuous, adequate, accurate and timely disclosure of information by the Company to the Stock Exchanges on an ongoing basis to enable the investors to take an informed investment decision(s).

2.2 Regulation 30 of the Listing Regulations requires Listed Entities to promptly inform the Stock Exchange of all the events as well as price sensitive information which will have a bearing on the performance / operations of the Company by applying the following factors to ensure fairness and efficiency in the market: (a) Timely disclosure of relevant information to investors and (b) Adequacy and accuracy of the information disclosed.

2.3 The Company shall make timely disclosure of the event / information to the Exchange(s), at the time of occurrence of the event / information and where applicable, make periodic disclosures on the associated material developments till the time such event is resolved / closed.

3. CRITERIA FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION:

3.1 Events/information shall be considered as material in nature as per Regulation 30(4) of the Listing Regulations if it meets any the following criteria: Qualitative Threshold:

(a) The omission of an event or information, which is likely to result in significant market reaction if the said omission came to light at a later date; or

(b) The omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or



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Quantitative Threshold

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 Company;
- (ii) two percent of net worth, as per the last audited consolidated financial statements of the Company, 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 hereinabove 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.

4. AUTHORIZATIONS:

The Board of the Company has authorized Mr. Swarup Kumar Maity CFO of the Company to determine the materiality of event or information and make necessary disclosure to the stock exchange(s).

Contact details CFO:

Phone No:033 2230-7373/ 2248-3854
