

RADIANT CASH MANAGEMENT SERVICES LTD

(Formerly known as Radiant Cash Management Services Private Limited)

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS / INFORMATION

[Pursuant to Regulation 30(4)(ii) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

1. INTRODUCTION

The shares of Radiant Cash Management Services Ltd (“the Company”) has been listed on the stock exchanges of BSE & NSE from January 04, 2023 onwards and the Company intends to being fair and transparent in disclosing material information to the stakeholders in a timely manner, in accordance with the requirements of the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 (“Listing Regulations”).

The Policy is framed in compliance with the requirements stipulated under Regulation 30(4) of the Listing Regulations, for determination of materiality of events / information.

2. AUTHORISED PERSONS

The Board of Directors of the Company have authorized the following Key Managerial Personnel (KMP) as Authorized Persons to determine the materiality of an event or information and to make appropriate disclosure on a timely basis to the stock exchanges.

- a. Chairman and Managing Director
- b. Whole-time Director
- c. Chief Financial Officer
- d. Company Secretary

The Board of Directors, Chairman and Managing Director, Whole-Time Director, Chief Financial Officer, Company Secretary and all other words not defined herein shall have the same meaning as assigned to those terms under the Listing Regulations and Companies Act, 2013 as applicable.

3. GUIDELINES FOR MATERIALITY ASSESSMENT

Materiality should be determined on a case to case basis, depending on the facts and the circumstances pertaining to the event or information

Events or information as specified under Para A of Part A of Schedule III of the Listing Regulations are deemed to be “Material” and are required to be disclosed to the stock exchanges without application of any guidelines.

However, for the events specified under Para B of Part A of Schedule III (“Annexure 1”), are required to be disclosed, based on application of the following guidelines for determining materiality:

RADIANT CASH MANAGEMENT SERVICES LTD

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The omission of an event or information, which is likely to result in

- a. discontinuity or alteration of an event or information already available in the public domain;
- or**
- b. significant market reaction, if the said omission came to light at a later date.

If the above criteria is not applicable, an event/information may be treated as being material if in the opinion of the Board of Directors of the Company, the event / information is considered material.

4. GUIDELINE ON TIME OF OCCURANCE OF AN EVENT OR INFORMATION

The following may act as guideline deciding the time of occurrence of an event or information

- a. Depending on the nature of event, the time of occurrence would be the stage of discussions, negotiations or approvals etc.
- b. In cases like natural calamity and other unforeseen circumstances, as soon as the Company became aware of such an event/information.
- c. In matters which requires approval of the Board/ the Shareholders/ the Statutory Authorities etc., the time of receipt of such approval would be the guiding factor.

5. DISCLOSURE

This Policy shall be uploaded on the website of the Company.

6. POLICY REVIEW

- a. Any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this Policy.
- b. Any amendment to the Listing Regulations shall mutatis mutandis be deemed to have been incorporated in this Policy
- c. Any material changes to the Policy will require approval of the Board of Directors.

7. EFFECTIVE DATE

This amended Policy shall be effective from the date of approval from the Board of Directors.

RADIANT CASH MANAGEMENT SERVICES LTD

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Annexure 1

Events which shall be disclosed upon application of the guidelines for materiality referred under sub-regulation (4) of regulation (30):

1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2. Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit / division (entirety or piecemeal).
3. Capacity addition or product launch.
4. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
5. Agreements (viz. loan agreement(s) (as a borrower) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
6. Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
7. Effect(s) arising out of change in the regulatory framework applicable to the listed entity
8. Litigation(s) / dispute(s) / regulatory action(s) with impact.
9. Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.
10. Options to purchase securities including any ESOP/ESPS Scheme.
11. Giving of guarantees or indemnity or becoming a surety for any third party.
12. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

Explanation – Any event / information under points 8 and 11 shall be considered as ‘material’ if the value involved therein exceeds 10% of the turnover of the Company as at the end of the immediately preceding financial year.

Any other information/event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the listed entity which may be necessary to enable the holders of securities of the listed entity to appraise its position and to avoid the establishment of a false market in such securities.

Without prejudice to any of the above, the Company may make disclosures of event/information as specified by the Board or Securities Exchange Board of India from time to time.