



Gulf Oil Lubricants India Limited

POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR INFORMATION

As per Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as SEBI Listing Regulations), Gulf Oil Lubricants India Limited (“the Company”) is required to frame a policy for determination of materiality for disclosure of events or information to Stock Exchanges, based on the criteria specified in Reg. 30 of SEBI Listing Regulations.

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

The Company shall disclose all such material events, specified in Para B of Part A of Schedule III of the SEBI Listing Regulations subject to application of guidelines for materiality.

Guidelines for determining materiality of events or information:

1. The Company shall consider the following criteria for determination of materiality of event or information:
 - (a) the omission of an event or information which is likely to result in discontinuity or alteration of event or information already available publicly;
 - (b) 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;
 - (c) in the cases 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 the Company, the event/information is considered material



2. The Board of Directors of the Company has authorized Chief Financial Officer of the Company for the purpose of determining materiality of an event or information and making disclosures of such material event or information to the Stock Exchanges.
3. The Board of Directors of the Company has further authorized Company Secretary and Compliance Officer of the Company for making disclosures of such material event or information to the Stock Exchanges.
4. This policy is effective from December 1, 2015.
5. This policy shall be disclosed on the Company's website www.gulfoilindia.com and contact details of authorized persons shall also be disclosed to the Stock Exchanges and as well as Company's website.
6. This policy may be amended by the Board as and when required from time to time.
7. Disclosures:
 - a) The disclosures in respect of events and information specified in sub-para 4 of Para A of Part A of Schedule III of SEBI Listing Regulations shall be made within 30 minutes of the conclusion of the Board meeting in which the respective event or information is approved.
 - b) All other events and information falling under Part A of Schedule III of SEBI Listing Regulations apart from those specified in (a) above shall be disclosed to the Stock Exchanges as soon as reasonably possible but not later than twenty-four hours from the occurrence of event or information. In case the disclosure is made after 24 hours of occurrence of the event or information, the Company shall provide explanation for the delay along with the disclosure.
 - c) The Company shall disclose all further material developments with respect to the disclosures referred to in this Policy on a regular basis, till the event is resolved / closed, with relevant explanations.



- d) The disclosure as finalized shall be submitted to the Stock Exchanges by any of the authorized personnel and thereafter the disclosure shall be uploaded on the website of the Company. The disclosure shall be uploaded on the website of the Company for a minimum period of five years and thereafter as per the Archival Policy of the Company.
8. Fraud/ Default by any Director, Promoter or KMP or by the company or arrest of any Promoter or KMP:
The estimated details with regard to any fraud/ default by any director, Promoter or KMP or by the Company or arrest of any Promoter or KMP shall be disclosed at the time of unearthing of the fraud or occurrence of default/ arrest. A subsequent disclosure shall be made with respect to further details of the fraud/default/arrest such as actual amount involved (if any), actual impact on the Company and its financials and corrective measures taken by the Company.
9. In the event of any conflict between the provisions of this Policy and the Companies Act, 2013 or SEBI Listing Regulations or any other statutory enactments or rules, the provisions of SEBI Listing Regulations / Act or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

Last amended on February 05, 2021