



POLICY FOR DETERMINING MATERIAL EVENTS AND INFORMATION

1. Objective

In terms of regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Board of Directors (the "Board") of Frontier Capital Limited (the "Company") has adopted this policy at its meeting held on 9th November, 2015 for determination of material events and information so that such event and information can be promptly disclosed to the stock exchanges, as per the prescribed Regulations.

This Policy is effective from December 1, 2015.

2. Policy

A. Any of the Key Managerial Person(s) authorised by the Board shall determine the materiality of any event or information, classify it as a Material event or Information and for the purpose of making disclosure to the stock exchanges.

B. Certain event and information would be *per se* Material event or Information as per regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

C. Besides *per se* Material Information, Company shall consider the following criteria for determination of materiality of events/ 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; or

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

(c) in case where the criteria specified in sub-clauses (a) and (b) are not applicable, an event/information may be treated as being material if it has have an impact of amount equivalent to 10% or more of the total revenue of the Company as per the last audited consolidated financial statements, provided that:

i) any confidential information which if disclosed is likely to put at risk the business interest of the Company; or

ii) any event or information arising out of it in the normal course of business shall not be disclosed even though it fulfills the criteria of materiality. The Company to that extent may make qualified disclosures to the Stock Exchanges.

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Approved By:	Usha Iyengar - Director





D. In some cases, to ascertain materiality, thresholds as prescribed in clause 2.C of this policy, cannot be applied, in such cases, any of the Key Managerial Person(s) authorised by the Board shall frame their opinion on a case to case basis, based on specific facts and circumstances relating to the information/event and while doing so, it may consider, among other factors, the following factors:

(i) Whether there would any direct or indirect impact on the reputation of the Company; or

(ii) Whether non-disclosure can lead to creation of false market in the securities of the Company; or

(iii) Whether there would be a significant impact on the operations or performance of the Company. Provided that:

a. any confidential information which if disclosed is likely to put at risk the business interest of the Company; or

b. any event or information arising out of it in the normal course of business ; shall not be disclosed. The Company to that extent may make qualified disclosure to the stock exchanges.

(An illustrative list of Material Event and Information described in clause 2.B and 2.C of this policy is annexed.)

E. In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard shall take precedence over the policy until such time as this policy is changed to conform to the law, rule, regulation or standard.

