REGISTERED OFFICE: L-7, Verna Industrial Estate, Verna, Salcete, Goa - 403 722. India. • Tel +91 832 2885400
CIN: L30007GA1993PLC001341

smartlink
Smart Solutions for a Smarter Planet

01st December, 2015

To,
Mr. Hari K - Asst. Vice President
National Stock Exchange of India Ltd
"Exchange Plaza", C-1, Block G,
Bandra - Kurla Complex,
Bandra (E), Mumbai - 400 051

To,
The Manager - Corporate
The Corporate relationship Department
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Sub: Reg 30 Policy on Determination of Materiality & related matters
Scrip Code: NSE: SMARTLINK BSE: 532419

Dear Sir,

Pursuant to Regulation 30 of the SEBI (Listing Obligation and Disclosure requirements) Regulations, 2015 the Board of Directors of the Company has approved and adopted a policy on determination of materiality and has further authorized certain officials for the purpose of determining materiality of an event and for the purpose of making disclosures to the stock exchange under this regulation, as detailed in the said policy. A copy of the said policy is enclosed for your ready reference.

As required under Regulation 30 (5) of the said regulations, we also provide the contact details of such persons authorized for the purpose as under:

1. Mr. K. R. Naik – Executive Chairman
   Plot No.5, Bandra Kurla Complex Road, Off CST, Mumbai, Tel: 022 – 30616666

2. Ms. Arati Naik – Whole Time Director, (designated as Chief Operating Officer)
   Plot No.5, Bandra Kurla Complex Road, Off CST, Mumbai, Tel: 022-30616666

3. Mr. K. G. Prabhu – Chief Financial Officer
   L-7, Verna Industrial Estate, Verna, Salcete, Goa, Tel: 0832 – 2885400

4. Ms. Urjita Damle – Company Secretary
   L-7, Verna Industrial Estate, Verna, Salcete, Goa,
   Email: Company. Secretary@smartlink.co.in Tel: 0832 - 2885400

Request you to kindly take the above on record.

Thanking You,
Yours Faithfully,
For **SMARTLINK NETWORK SYSTEMS LIMITED**

URJITA DAMLE
COMPANY SECRETARY

SMARTLINK NETWORK SYSTEMS LIMITED

POLICY FOR DETERMINING MATERIALITY OF INFORMATION /EVENTS BY COMPANIES FOR DISCLOSURE TO STOCK EXCHANGES

1. INTRODUCTION

Securities Exchange Board of India has formulated the SEBI (Listing Obligations and Disclosure Requirements), 2015 which replaces the existing listing agreement. The same shall come into force with effect from 1st December, 2015.

Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements), 2015 ("**Regulations**"), the Board of Directors (the "Board") of Smartlink Network Systems Limited (the "Company") provides that the Company has to formulate and adopt a Policy, for determination of materiality of information/events ("**Material Events Disclosure Policy**") so that such information can be promptly disclosed to the stock exchanges and made available to all stake holders, as per the prescribed regulations.

This Policy shall be effective from 1st December, 2015.

2. OBJECTIVE

The Policy aims to provide a framework for determining materiality of events and information for the purpose of making disclosure to Stock Exchanges in terms of sub-regulations 3 and 4 of Regulation 30 of Listing Regulations.

3. CRITERIA FOR DETERMINATION OF MATERIALITY OF EVENTS AND INFORMATION

3.1 Qualitative Materiality Thresholds:

The company shall consider the following criteria for determination of materiality of events and information:

I. the event or information, omission of which is likely to result in discontinuity or alteration of event or information already available publicly; or
II. the event or information, omission of which is likely to result in significant market reaction if disclosure or disclosure regarding omission came to light at a later date;
III. In case where the criterion specified in sub-clauses (I) and (II) are not applicable, an event/information may be treated being material, if in the opinion of the Board of Directors of the Company, the event or information is considered material.

3.2 Quantitative Materiality Thresholds

The event or information the impact of which is more than 20% of the turnover or 20 % of the net worth of the Company, whichever is higher as the case may be. These thresholds shall be determined on the basis of audited standalone financial statements of the Company for the preceding financial year.

4. DISCLOSURES

4.1 The events mentioned in PART–A: Disclosures of Events or Information as per Schedule III of the Regulations shall be disclosed without any application of the guidelines of materiality. The indicative list of such events contained in the Regulations shall form part of this policy. **(Sub regulation (4) of Regulation 30).**

4.2 The events and information conforming to the materiality thresholds as specified in Clause 3.1 or Clause 3.2 above for the purpose of disclosure to the Stock Exchanges in terms of Regulation 30 (3) of the Listing Regulations shall be as contained in Annexure - A and shall form part of this policy.

4.3 The Company shall disclose the information to the Stock exchanges in accordance with the Regulations and circulars issued by SEBI from time to time.

4.4 The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company.

4.5 The Company shall also disclose any other event or information to the Stock Exchanges which is considered material by the Board of Directors of the Company.

5. AUTHORITY

5.1. The Board of Directors of the Company has authorised the Whole Time Director/ Executive Chairman, Chief Financial Officer and Company Secretary ("Authorised persons"), any two of them acting jointly, to determine the materiality of any event/information for the purpose of disclosure to the Stock Exchanges.

5.2 Normally, the Company Secretary shall make necessary disclosures of events or information to the Stock Exchanges under Regulation 30 of Listing Regulations. However, such disclosures can also be made either by Chief Financial Officer or Whole Time Director/Executive Chairman of the Company.

6. AMENDMENT

This Policy can be amended, modified or revised by the Board of Directors of the Company from time to time. In case any provisions in this policy, which is inconsistent with the provisions of Companies Act, 2013 and any rules made thereunder and Regulations, ("Statutory Enactments") he provisions of statutory enactments shall prevail.

ANNEXURE – A

Sr. No.	Event / Information
1.	Commencement or any postponement in the date of commencement of a project or 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 divisions of the Company due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts, break down of machinery 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 the Company.
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.