

POLICY ON DETERMINATION OF MATERIALITY OF EVENTS

I. BACKGROUND AND APPLICABILITY OF THE POLICY

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”) requires every Listed Company to disclose events or information which, in the opinion of the Board of Directors of a Company are material.

In this context, the following policy has been framed by the Board of Directors (“Board”) of CMX Holdings Limited (Formerly known as SIEL Financial Services Limited) (“Company”) with the objective of determining materiality of events.

1. Regulation 30 of the Regulations mandates disclosure of all deemed material events to the Stock Exchanges. These events have been specified in Para A of Schedule III of the Regulations and shall be disclosed as applicable from time to time.
2. For disclosure of certain events (as specified in Para B of Schedule III) to the Stock Exchanges the following criteria shall be considered by the Board for determining whether the events are material or not: -

Where the omission of an event or information, is likely to result in:

- a) Discontinuity or alteration of event or information already available publicly or
- b) A significant market reaction if the said omission came to light at a later date.

Where it would be difficult to report the events based on qualitative criteria as stated in points a) and b) above, the same may be considered material for disclosure, upon meeting materiality thresholds as mentioned herein below.

This policy shall also apply to the events to which neither Para A or Para B of Part A of Schedule III applies but have a material effect on the Company.

II. MATERIALITY THRESHOLDS

Materiality must be determined on a case-to-case basis depending on specific facts and circumstances relating to the information/event.

The qualitative {as stated in points (a) and (b)} and quantitative criteria shall apply to events specified in Para B of Schedule III of the SEBI Regulations only. (Reproduced as an **Annexure** to this Policy).

The following will be materiality criteria: -

An event specified in the Annexure to the policy would be considered material if the impact of the event, if measured in

