



NATCO'S POLICY FOR DETERMINATION OF MATERIALITY OF AN EVENT OR INFORMATION

In pursuance of the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Requirements') the Board of Directors ('Board') of Natco Pharma Limited (the 'Company') hereby formulate the policy for determining material subsidiary which shall be called "Natco's Policy on Determination of Material Subsidiary" (the 'Policy') which is effective from 01.12.2015.

PURPOSE:

To determine whether any event or information pertaining to the Company is material or otherwise for the purpose of disclosing the same to Stock Exchanges.

DEFINITIONS:

Any term used in this policy shall have the meaning ascribed to it in the Companies Act, 2013 or Rules made thereunder, SEBI Act, 1992 or Rules and Regulations made thereunder or any other relevant legislation/law applicable to the Company.

EVENTS SPECIFIED IN ANNEXURE – A

- **Materiality:**

Those events specified in Annexure-A (which are reproduced from Part A of Schedule III to the Listing Requirements) be deemed to be material events.

- **Disclosure:**

Company shall make timely disclosure of such events to the Stock Exchanges as stated in the Annexure-A. Where no time is stipulated it shall be disclosed as soon as possible but not later than one working day from the occurrence of the event or having knowledge of the information, as the case may be.

EVENTS SPECIFIED IN ANNEXURE – B (OR) OTHER EVENTS

- **Materiality:**

An event or information specified in Annexure – B (which are reproduced from Part B of Schedule III to the Listing Requirements) or any other event shall be considered as material



upon application of the following guidelines as stated under Regulation 30 of the Listing Requirements which are as below:

1. The omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
2. 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;
3. 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 in the opinion of the Board, the event / information is considered material;

- **Disclosure:**

Company shall first disclose to stock exchange(s) of all events or information as specified in the Annexure-B as soon as possible but not later than one working day from the occurrence of the event or having knowledge of the information, as the case may be.

AUTHORISATION TO KMP

One or more of the Key Managerial Personnel of the Company shall be authorised by the Board to decide whether an event or information is material or otherwise and to disclose the same on the Company's website, simultaneously while submitting to Stock Exchanges.

POWER TO AMEND

The Board shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy in conformity with the applicable laws in force.

CONTINUOUS DISCLOSURE

The Company shall make disclosures updating material developments of the disclosures made herein on a regular basis, till such time the event is resolved/closed, with relevant explanations.



Natco Pharma Limited

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EVENTS/INFORMATION PERTAINING TO SUBSIDIARIES

The Company shall disclose all events or information with respect to material subsidiary, if any, of the Company.

DISCLOSURE IN WEBSITE

Company is required to disclose the policy on its website and a web link thereto shall be provided in the Annual Report of the Company.