



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 Regulations') the Board of Directors ('Board') of Natco Pharma Limited (the 'Company') hereby formulate the Policy for determination of materiality of an event or information which shall be called "Natco's Policy for determination of Materiality of an Event or Information" (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 PART A OF SCHEDULE III

- **Materiality:**

Those events specified in 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 Part A of Schedule III to Listing Regulations. 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 PART B OF SCHEDULE III (OR) OTHER EVENTS

- **Materiality:**

An event or information specified in Part B of Schedule III to the Listing Regulations 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 Part B of Schedule III 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.

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.

The following Key Managerial Personnel of the Company are authorised 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:

Sl. No.	Name of the Key Managerial Personnel	Designation	Contact Details
1.	Sri V.C. Nannapaneni	Managing Director	Investors@natcopharma.co.in
2.	Sri Rajeev Nannapaneni	Director and CEO	
3.	Sri S.V.V.N. Appa Rao	Chief Financial Officer	
4.	Sri Ch. Venkat Ramesh	Company Secretary & Compliance Officer	

Contact number of KMP's for the above purpose is 040 23547532