



NECTAR LIFESCIENCES LIMITED
CIN: L24232PB1995PLC016664

NLL MATERIALITY OF INFORMATION POLICY

1. Preface

The Board of Directors (the "Board") of Nectar Lifesciences Limited (the "Company") has adopted the following policy and procedures with regard to determination of Materiality of events or information which are required to be disclosed to the Stock Exchanges in terms of Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) (The Policy). This Policy has been formulated in accordance with Clause (ii) of sub-regulation (4) of Regulation 30 of the Listing Regulations.

2. Purpose of the Policy

The purpose of this Policy is to determine materiality of events and information based on criteria specified under clause (i) of sub-regulation (4) of Regulation 30 of the Listing Regulations and to ensure that the Company shall make disclosure of events / information specified in para A and B of Part A of Schedule III of the Listing Regulations to the Stock Exchanges.

3. Criteria for determination of materiality of events / information

The Company shall consider the criteria as specified in clause (i) of sub-regulation 4 of Regulation 30 of the Listing Regulations for determination of materiality of events / information. The clause (i) of sub-regulation 4 of Regulation 30 of the Listing Regulations is re produced herein below for ease of reference:

"30(4)(i) The listed entity 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 in the

opinion of the board of directors of listed entity, the event / information is considered material.”

4. Disclosure of events or information

A. The events / information specified in para A of Part A of Schedule III to the Listing Regulations, as amended from time to time, upon occurrence of which the Company shall make disclosure to the Stock Exchanges without any application of the guidelines for materiality.

B. The following events / information specified in para B of Part A of Schedule III to the Listing Regulations upon occurrence of which the Company shall make disclosure to the Stock Exchanges after following the procedural guidelines as given in para 5 of this Policy:

- i. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
- ii. 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).
- iii. Capacity addition or product launch.
- iv. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
- v. 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.
- vi. Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
- vii. Effect(s) arising out of change in the regulatory framework applicable to the listed entity
- viii. Litigation(s) / dispute(s) / regulatory action(s) with impact.
- ix. Fraud/defaults etc. by Directors (other than key managerial personnel) or employees of listed entity.
- x. Options to purchase securities including any ESOP/ESPS Scheme.
- xi. Giving of guarantees or indemnity or becoming a surety for any third party.

- xii. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

5. Procedural Guidelines for determination of materiality of events/ information

In order to ensure that the Company complies with the disclosure obligations under Regulations 30 of the Listing Regulations, the Board has established an internal system for reporting any event / information which may require disclosure so that the event / information can be properly assessed and decision can be made regarding its disclosure to the Stock Exchanges.

Under the system, Chairman & Managing Director, Chief Executive Officer, Chief Finance Officer, President (Operation), Head of the Departments who are responsible for relevant areas of the Company's operations (Responsible Officers) must report to Chief Executive Officer & Director (which expression shall include a Wholetime Director designated as such or not or any other person rendering such duties by whatsoever name called) with copy to Company Secretary of the Company of any event / information which may possibly be material or of which the Responsible Officer is unsure as to its materiality. The event / information should be reported immediately after a Responsible Officer becomes aware of it.

On receipt of communication of potential material event / information, the Company Secretary will:

- i. Review event / information and to take whatever steps necessary to verify its accuracy;
- ii. Assess whether in his/her opinion the event / information is required to be disclosed to the Stock Exchanges under the Listing Regulations;
- iii. Report the matter to Chief Executive Officer & Director or in his absence Chairman & Managing Director, that event / information is material and requires disclosure under Regulation 30 of the Listing Regulations.

The decision of Chief Executive Officer & Director or in his absence Chairman & Managing Director, whether information is material or not, is final.

Where the Chief Executive Officer & Director or in his absence Chairman & Managing Director and Company Secretary are not certain about materiality of event / information, they may refer matter for external legal advice.

The procedure to be followed in relation to the lodgment of announcement of material event /information is as follows:

- i. **Prepare draft announcement to the Stock Exchanges:** If the event / information is material, the Company Secretary will prepare draft announcement to the Stock Exchanges which is factual and expressed in clear manner and obtain approval of Chief Executive Officer & Director or in his absences Chairman & Managing Director.
- ii. **Lodge Announcements:** The Company Secretary on behalf of the Company will lodge or arrange for lodgment of the announcement with the Stock Exchanges.
- iii. **Post announcement on website:** After lodgment of the announcement with the Stock Exchanges, the Company Secretary will arrange to place it on the website of the Company. All he announcements made under this Policy shall be kept on the website as per the Archival Policy of the Company.

6. Communication of this Policy

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the web-site of the Company.

7. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.