



NEULAND POLICY

ON

DETERMINATION OF MATERIALITY

OF

EVENTS OR INFORMATION

Neuland Laboratories Limited,
11th Floor (5th Level), Phoenix IVY
Building, Plot No. 573A-III, Road No.
82, Jubilee Hills, Hyderabad, 500033,
Telangana, India
www.neulandlabs.com

TABLE OF CONTENTS

S. No	Details	Page No
1.	Legal Framework	2
2.	Objective	2
3.	Applicability	2
4.	Guidelines on occurrence of an event / information	3
5.	Disclosure of events / information	3
6.	Obligations of Internal Stakeholders	4
7.	Authorization for determination of materiality and disclosure	4
8.	Disclosure on the website of the Company	4
9.	Amendment	5

NEULAND POLICY ON DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION
(as originally approved at the Board Meeting held on October 29, 2015, modified by the Board at their meeting held on November 10, 2022 and November 7, 2023)

1. Legal Framework

The Neuland Policy on Determination of Materiality of Events or Information (the “Policy”) is aimed at providing guidelines to the Management of Neuland Laboratories Limited (the “Company”), to determine the materiality of events or information, which could affect the investment decisions and ensure timely and adequate dissemination of information to the stock exchanges.

This Policy has been formulated in accordance with the current guidelines laid down by Securities Exchange Board of India (“SEBI”), under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”) as amended from time to time, with respect to disclosure of events and information.

2. Objective

The objective of this Policy is to serve as a guiding charter to the Management to ensure that timely and adequate disclosure of events or information are made to the investor community by the Company under the SEBI Listing Regulations, to enable them to take well-informed investment decisions with regard to the securities of the Company.

3. Applicability

Information relating to material events and which is price sensitive in nature, shall be promptly disseminated to the Stock Exchanges. For this purpose, material event means any information which relates to the Company and which, if published is likely to materially affect the price of shares of the Company.

- i. The Company shall make disclosure of events specified in Para A of Part A of Schedule III of the SEBI Listing Regulations and as may be amended from time to time, without applying any test of materiality to the stock exchanges within specified timelines.
- ii. The Company shall make disclosure of events specified in Para B of Part A of Schedule III of the SEBI Listing Regulations and as may be amended from time to time, based on application of the guidelines for materiality, to the stock exchanges within specified timelines, as specified below:

Materiality will be determined on case-to-case basis depending on specific facts and circumstances in relation to the event / information. The determination of materiality is primarily driven by following qualitative and quantitative factors as mentioned under the SEBI Listing Regulations:

- 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; or
- c. The omission of an event or information, whose value or the expected impact in terms of value, exceeds the materiality threshold as prescribed under Regulation 30 of the SEBI Listing Regulations; or

In case where the criteria specified in point (a), (b) and (c) is not applicable, an event or information may be treated as being material if in the opinion of the Board of Directors of the Company, the event or information is considered material

4. Guidelines on occurrence of an event / information

The occurrence of material event/information would be either by the Company's own accord or not in the hands of the Company. It can be categorized as under:

- (i) depends upon the stage of discussion, negotiation or approval and
- (ii) in case of natural calamities, disruptions etc., it would depend upon the timing when the Company became aware of the event/information.

In respect of the events under 4(i), the events/information can be said to have occurred upon receipt of approval of Board of Directors, e.g. further issue of capital by rights issuance and in certain events/information after receipt of approval of both i.e. Board of Directors and Shareholders. However, considering the price sensitivity involved, for certain events e.g. decision on declaration of dividends etc., disclosure shall be made on receipt of approval of the event by the Board of Directors, pending Shareholder's approval.

In respect of the events under 4(ii), the events/information can be said to have occurred when the Company becomes aware of the events/information, or as soon as, an Officer of the Company has, or ought to have reasonably come into possession of the information in the course of the performance of his or her duties. The term 'officer' shall have the same meaning as defined under the Companies Act, 2013 and shall also include Promoter of the Company.

In case an event or information is required to be disclosed by the Company in terms of the provisions of Regulation 30 of SEBI Listing Regulations, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

5. Disclosure of events / information

The Company shall disclose all events or information within the timelines specified in the SEBI Listing Regulations.

The Company shall make disclosures updating the material developments pertaining to material events on a regular basis, till such time the event is resolved/closed, and to be disclosed to the stock exchanges with relevant explanations.

The Company shall also disclose all events or information with respect to subsidiaries which are material, if any, for the Company.

6. Obligations of Internal Stakeholders

- i. The members of the Core Management Committee and/or Senior Management Personnel and/or officers of the Company, in terms of the Company's internal and external disclosure processes, are severally authorized and required to identify the event / information that is material in nature, in line with the provisions of the SEBI Listing Regulations and this policy.
- ii. Upon identification, the details of such event / information shall be communicated to the Authorized Person(s) for determination of materiality of event / information and making the necessary disclosures to the Stock Exchange(s)

7. Authorization for determination of materiality and disclosures

Authority for determination: The following personnel are hereby severally authorized by Board of Directors for the purpose of determining materiality of an event or information and for the purpose of making disclosures to the stock exchanges ("Authorized Person(s)"):

- a. Vice Chairman and Chief Executive Officer
- b. Vice Chairman and Managing Director
- c. Chief Financial Officer
- d. Company Secretary and Compliance Officer

The Authorized Person(s) are hereby severally authorised to report and clarify any event or information to the Stock Exchange(s).

Authority for disclosure: In addition to the above, the Company Secretary & Compliance Officer, is severally authorized for the purpose of making disclosures to the Stock Exchange(s) pursuant to the aforesaid Regulation 30 of the SEBI Listing Regulations.

8. Disclosure on the website of the Company

All such events or information which has been disclosed to stock exchanges under the SEBI Listing Regulations shall be made available on the Company's website. Such events or information shall be placed on the website of the Company for a minimum period of five years.

The Policy and the contact details of the persons authorized by the Board shall be available on the website of the Company.

9. Amendment

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time. Any statutory amendments that may affect this Policy, i.e., SEBI Listing Regulations and other applicable laws / regulations, shall be deemed to be included in the Policy and the Company shall be governed by it.

In the event of any conflict between the provisions of this Policy and of the Companies Act, 2013 (“Act”) or the SEBI Listing Regulations or any other statutory enactments, rules, the provisions of such Act or the SEBI Listing Regulations or statutory enactments, rules shall prevail over this Policy.