



STRIDES PHARMA SCIENCE LIMITED

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS AND INFORMATION FOR DISCLOSURE TO STOCK EXCHANGES

Amended and effective April 2, 2025

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1 PREAMBLE

Board of Directors of the Company have adopted this policy in line with the requirement of Regulation 30 of Listing Regulations to identify and disclose material events or information to the Stock Exchanges.

2 DEFINITIONS

- a) **“Act”** shall mean the Companies Act, 2013, and Rules framed thereunder, as amended from time to time.
- b) **“Board”** shall mean the Board of Directors of the Company.
- c) **“Company or Listed Company”** shall mean Strides Pharma Science Limited.
- d) **“Material Event/ Information”** means events/ information as specified under Clause 3 of this Policy.
- e) **“Deemed Material Events”** are events/ information that shall be disclosed to Stock Exchanges without any application of guidelines for materiality as specified in this Policy.
- f) **“Guideline Based Material Events”** are events/ information which shall be disclosed to Stock Exchanges upon application of guidelines for materiality as specified in Clause 4 of this Policy.
- g) **“Key Managerial Personnel or KMP”** shall mean KMP as defined under Section 2 (51) of the Act read with Regulation 2(o) of Listing Regulations.
- h) **“Listing Regulations”** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, and as amended from time to time.
- i) **“SEBI”** shall mean the Securities and Exchange Board of India.
- j) **“Senior Management”** shall mean Senior Management as defined under Regulation 16(1)(d) of Listing Regulations.

Any words used in this Policy but not defined herein shall have the same meaning ascribed to it in the Act or Rules made thereunder, Listing Regulations or any other relevant legislations or law applicable to the Company.

3 TYPES OF EVENTS/ INFORMATION FOR DISCLOSURE

Events/ Information covered under this Policy shall be determined and disclosed by the Company in the manner set forth in this Policy.

- a) **Deemed Material Events** shall be disclosed mandatorily without application of any guidelines of materiality in line with Schedule III – Part A, Para A of Listing Regulations.
- b) **Guideline Based Material Events** shall be disclosed based on application of guidelines for materiality as specified in line with Schedule III – Part A, Para B of Listing Regulations.
- c) **Any other Event and/ or Information** – Company shall disclose major developments that is likely to affect business of the Company e.g., emergence of new technologies, expiry of patents, any change of accounting policy that may have significant impact on the accounts, etc., and brief details thereof and any other information which is exclusively known to the Company which may be necessary to enable holders of securities of the Company to appraise its position and to avoid establishment of a false market in such securities.
- d) Without prejudice to the generality of above, Company may make disclosure of event/ information as specified by SEBI from time to time.

4 CRITERIA FOR DETERMINATION OF MATERIALITY OF EVENTS/ INFORMATION

Materiality of an event/ information shall be determined on a case-to-case basis depending on facts and circumstances of such event/ information.

Company shall apply the following criteria for determination of materiality of events/ information:

- a) **Omission of an event or information which is likely to:**
 - i. Result in discontinuity/ alteration of an event or information already available publicly; OR
 - ii. Result in significant market reaction, if the said omission comes to light, at a later date.

- b) Omission of an event or information, whose value or expected impact in terms of value, exceeds the lower of the following:**
- i. Two percent of turnover, as per last audited consolidated financial statements of the Company;
 - ii. Two percent of net worth, as per last audited consolidated financial statements of the Company, except in case the arithmetic value of net worth is negative;
 - iii. Five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company.
- c) In situations where criteria specified in 4 (a) and (b) are not applicable, an event or information may be treated as being material, if such event or information is considered material in the opinion of Board of the Company.**

5 DETERMINATION OF MATERIALITY OF EVENTS/ INFORMATION AND DISCLOSURE

KMPs of the Company are severally authorized by the Board to:

- i. Review and assess an event or information that may qualify as ‘material’ and may require disclosure, on basis of facts and circumstances prevailing at a given point in time;
- ii. Determine appropriate time at which such disclosures are to be made to Stock Exchanges based on an assessment of actual time of occurrence of an event or information;
- iii. Review, finalize and make appropriate disclosures to Stock Exchanges under this Policy;
- iv. Disclose developments that are material in nature on a regular basis, till such time the event or information is resolved or closed, with relevant explanations;
- v. Provide specific and adequate reply to all queries raised by Stock Exchange(s) with respect to any events or information;
- vi. Disclose all events/ information with respect to subsidiaries, which are material for the Company;

- vii. Seek appropriate counsel or guidance, as and when necessary, from other internal or external stakeholders as they may deem fit;
- viii. To evaluate the information submitted by the Relevant Employees of the Company about any potential material event or information and to determine if disclosure is required to be made to the Stock Exchanges.
- ix. *Suo moto* confirm/ deny/ clarify any reported event or information to the Stock Exchanges (including those in mainstream media which is not general in nature and which indicates that rumours of an impending specific event or information is circulating amongst the investing public, as soon as reasonably possible but in any case not later than 24 hours from reporting of such event or information.

In case the Company confirms the reported event/ information, it shall also provide the current stage of such event/ information.

6 TIMELINES FOR DISCLOSURE OF EVENTS/ INFORMATION

Company shall disclose all events/ information to Stock Exchanges as soon as reasonably possible, but not later than the timelines prescribed under Regulation 30(6) read with Schedule III of the SEBI Listing Regulations.

In case disclosure to Stock Exchanges is made after prescribed timeline, Company shall, along with such disclosures provide an explanation for delay.

All events or information which has been disclosed to Stock Exchange(s) under this Policy shall be hosted on the website of the Company for a minimum period of 5 (five) years and thereafter archived as per the archival policy of the Company.

In case an event or information is required to be disclosed by the Company in terms of provisions of Listing Regulations, pursuant to 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.

7 DISCLOSURE REQUIREMENTS FOR CERTAIN TYPES OF AGREEMENTS BINDING LISTED COMPANY

All Shareholders, Promoters, Promoter Group entities, Related Parties, Directors, KMP and Employees of the Listed Company or of its holding, subsidiary and associate company, who are parties to the agreements specified in Clause 5A of Para A of Part A of Schedule III to Listing Regulations, shall inform the Listed Company about the agreement, to which such a Listed Company is not a party, within two working days of entering into such agreements or signing an agreement to enter into such agreements.

The Listed Company shall disclose all such agreements subsisting to the Stock Exchanges and on its website within the timelines as specified by SEBI.

8 IDENTIFICATION OF POTENTIAL MATERIAL EVENTS/ INFORMATION BY THE EMPLOYEES

Relevant employees of the Company and/ or its Subsidiaries shall be guided by this Policy. In the event they have access to or become aware of any potential material event or information, they must report the same immediately to the Designated KMPs for determining the materiality of the said event/ information and making necessary disclosures to the Stock Exchanges.

9 DISSEMINATION OF THE POLICY

This Policy shall be disclosed on the website of the Company.

10 POLICY REVIEW

Board may make any amendments to this Policy from time to time.

In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule or regulation, then such law, rule or regulation will take precedence over this policy and procedure until such time as this policy appropriately updated to conform to such law, rule or regulation.



11 CONTACT DETAILS

Contact details of KMPs authorised to determine materiality of events and/ or information under this Policy by the Board of Directors of the Company, are provided below:

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