

**EFFECTIVE DATE:**

The Policy shall come into effect on: **December 15, 2025**

## **POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION**

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**INTRODUCTION:**

This policy is formulated in compliance with Regulation 30 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 and other applicable provisions (including any statutory enactments / amendments thereof), by the board of directors of M/s Symbiotec Pharmed Limited ("**Company**").

The purpose of this Policy is to provide overall governance framework for ascertaining the materiality of events or information relating to the Company. The company shall disclose the events or information which in the opinion of the board of directors is material and disclosures are required to be hosted on the website of the Company for a minimum period of 5 years and thereafter, as per its Archival Policy of the Company.

**DEFINITIONS:**

In this Policy, unless the context otherwise requires:

- a) "**Act**" means the Companies Act, 2013 and the rules framed thereunder, as amended from time to time.
- b) "**Company**" means Symbiotec Pharmed Limited.
- c) "**Board of Directors**" or "**Board**" means the Board of Directors of the Company.
- d) "**Key Managerial Personnel**" means key managerial personnel as defined under Section 2(51) of the Companies Act, 2013.
- e) "**LODR Regulations**" means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.
- f) "**Net Worth**" shall have the meaning as defined under Section 2(57) of the Act;
- g) "**Policy**" means this policy, as amended from time to time.
- h) "**SEBI**" means the Securities and Exchange Board of India.
- i) "**Rules**" means the rules made under the Act.

j) **“Stock Exchange(s)”** means stock exchanges where the Equity Shares of the Company are listed.

k) **“Turnover”** shall have the meaning defined under Section 2(91) of the Act;

All other words and expressions used but not defined in this Policy, shall have the same meaning as defined in the Companies Act, 2013, SEBI (LODR) Regulations, 2015 or any other applicable law or regulation to the extent applicable to the Company.

## **DETERMINATION, REPORTING AND DISCLOSURE:**

1. The Company shall disclose all such events which are specified in Para A of Part A of Schedule III of the LODR Regulations (as applicable from time to time) (“Para A Events”) without any application of the guidelines for materiality as specified in sub-regulation (2) of Regulation 30 of the LODR Regulations. Details to be provided to the Stock Exchanges while disclosing Para A Events shall be in compliance with the requirements of the SEBI. The Company shall disclose all such material events or information pertaining to itself or to its subsidiary(ies), specified in Para B of Part A of Schedule III of the LODR Regulations (“Para B Events”) subject to application of guidelines for materiality, as set out under the LODR Regulations.
2. The Company shall consider 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; or
  - c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
    - i. two percent of turnover, as per the last audited consolidated financial statements of the listed entity;
    - ii. two percent of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the 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 listed entity
  - d) In case where the criteria specified in sub-clauses (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:

Provided that any continuing event or information which becomes material pursuant to notification of these amendment regulations shall be disclosed by the listed entity within 30 days from the date of coming into effect of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2023.

- e) The Company shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions of this Policy as soon as reasonably possible and in any case not later than the timelines prescribed under LODR Regulations.
- f) The company shall make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.
- g) The company shall disclose all events or information with respect to subsidiaries which are material for the company.
- h) The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.
- i) The Company may on its own initiative also, confirm or deny any reported event or information to stock exchange(s).

**PERSON(S) RESPONSIBLE FOR DETERMINING MATERIALITY OF EVENT OR INFORMATION FOR MAKING DISCLOSURE:**

The Managing Director, Chief Financial Officer and Company Secretary or any other person as authorized by the board of directors shall be severally authorized to for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) under this regulation.

The contact details of such personnel shall be also disclosed to the stock exchange(s) and as well as on the company's website from time to time as required under LODR Regulations.

**LIMITATION AND AMENDMENT:**

In the event of any conflict between the provisions of this Policy and of the Act or LODR Regulations or any other statutory enactments, rules, the provisions of such Act or LODR Regulations or statutory enactments, rules shall prevail over this Policy.

Any subsequent amendment / modification in the LODR Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.

Further the board (including its duly constituted committee wherever permissible) shall review the policy on a regular basis, and they shall have power to amend, substitute, replace any of the provisions of this policy/ or the entire policy.