



POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

PREAMBLE:

Pursuant to Regulation 30 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), read with Amendments and Circular issued thereunder Gufic Biosciences Limited (“**Gufic**”) has formulated this policy for determination of materiality of certain events /information.

DEFINITION:

- “**Act**” Shall mean the Companies Act, 2013 and rules frame thereunder, including any modifications, clarifications, circulars or re-enactment thereof.
- “**Board**” means the Board of Directors of the Company.
- “**Listing Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. (As amended from time to time)
- “**Policy**” means this policy, as amended from time to time.
- “**Stock Exchange(s)**” means BSE Limited and the National Stock Exchange of India Limited, where the equity shares of the Company are listed.
- “**Key Managerial Personnel**” means Key Managerial Personnel or KMP as defined in sub-section (51) of section 2 of the Companies Act, 2013.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (‘Regulations’) or any other applicable law or regulation to the extent applicable to the Company.

OBJECTIVE:

- 1-1.1 As per the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (the “Regulations”), the Company is required to disclose to the Stock Exchanges events and information set out in Para A of Part A of Schedule III of the Regulations, as and when they take place in the Company. Further, in respect of events and information set out

in Para B of Part A of Schedule III of the Regulations, the Company has to frame a policy for determining materiality of event/information for disclosure to the Stock Exchanges.

- 1.2. The objective of this policy is therefore to define the events/information to be disclosed to Stock Exchanges; to lay down criteria for identification/determination of material events/information and designate persons authorized to determine materiality an disclosure.

EVENTS/INFORMATION DEEMED TO BE MATERIAL:

Para A of Part A of Schedule III of the Regulations prescribes list of events/information, which are deemed material and as and when such events/information takes place, Company shall promptly disclose the same to the Stock Exchanges within the prescribed time.

EVENTS/INFORMATION FOR WHICH MATERIALITY TO BE DETERMINED

Para B of Part A of Schedule III of the Regulations prescribes list of events/information which shall be disclosed upon application of criteria for determination of materiality as laid down in Regulation 30 (4) and reproduced below:

- (a) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly;
- (b) the omission of an event or information is likely to result in significant market reaction on Company's securities, if the said omission came to light at a later date;
- (c) In case where the criteria specified in (a) or (b) above are not applicable, an event/information may be treated as being material if in the opinion of the Board of Directors of the Company, the event/information is considered material.

PERSONS AUTHORISED TO DETERMINE MATERIALITY

The Board of Directors of the Company have authorised the Chief Executive Officer and Chief Financial Officer both jointly to determine materiality of event or information that has taken place, for the purpose of making disclosure to the Stock Exchanges.

SCOPE AND LIMITATION :

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

WEBSITE

This Policy shall be disclosed on the website of the Company. Further, the Company shall disclose on its website all such events or information which has been disclosed to the stock exchange(s) under the Listing Regulations and further that such disclosures shall be made available on the website of the Company for a period of at least five years thereafter.

AMENDMENTS AND UPDATES :

The Board of Directors may amend this Policy from time to time as may be required to comply with the applicable laws and Regulations.