

**STERLING BIOTECH LIMITED**  
**Regd. Office - 43, Atlanta Building, Nariman Point, Mumbai – 400 021**  
**CIN: L51900MH1985PLC035738**

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**Policy for the determining materiality of an event of information**  
**(Pursuant to clause 30(4)(ii) of SEBI (Listing Obligations and Disclosure requirements) Regulations, 2015**

The company 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, the following event/information shall be treated as being material in the opinion of the board of directors of the company and shall be dealt accordingly:
  - 1. Commencement or any postponement in the commencement of commercial production or commercial operations of any unit/division.
  - 2. 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).
  - 3. Capacity addition or product launch.
  - 4. Disruption of operations of any one or more units or division of the company due to natural calamity (earthquake, flood , fire etc.), force majeure or events such as strikes, lockouts etc.
  - 5. Options to purchase securities including any ESOP/ESPS scheme.
- (d) Any other information /events viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a 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 the holders of securities of the listed entity to appraise its position and to avoid the establishment of a false market in such securities.
- (e) Without prejudice to the generality of para (a), (b), (c) and (d) above, the company may make disclosures of event/information as specified by the board or key managerial personnel(s) authorised by the board from time to time.
- (f) Obligation of the Head of Departments of the company

The Head of Departments (“HOD’s”) which include

- Officers of the company heading a Department irrespective of designation
- Direct reportees to the Board

HOD's shall instantly pass on the details of any event or information covered under **clauses a to d** as soon as it happens or it comes in the knowledge of the HOD. Such details will be passed on to the following key managerial personnel:

1. Mr. Nitin Sandesara – Managing Director
2. Mr. Chetan Sandesara – Joint Managing Director

Non-compliance of the same may attract disciplinary actions including wage freeze, suspension of service and any other suitable action as may be decided by the Board.

The Board of Directors of the Company have authorised Mr. Chetan Sandesara, Joint Managing Director of the Company and in case of his inability to do so in a particular case, have authorised Mr. Nitin Sandesara, Managing Director of the Company for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) under the regulation.