



**Pharmaids Pharmaceuticals Limited**

**POLICY FOR DETERMINING MATERIALITY OF EVENT/ INFORMATION**

*(Pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015) (Hereinafter called as "LODR")*

**Amended by the Board of Directors on March 21, 2025**

## **A. LEGAL FRAMEWORK**

This Policy for Determination of Materiality of Event or Information is aimed at providing guidelines to the Management of M/s Pharmaids Pharmaceuticals Limited (“the Company”), to determine the materiality of any event or information, which could affect investment decisions and ensure timely and adequate dissemination of information to the Stock Exchange(s) (as hereinafter defined) and public at large.

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

Pursuant to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Board of Directors approved the “Policy for Determination of Materiality of Event or Information”. The Board shall review, and if found required, may amend this Policy from time to time.

## **B. OBJECTIVE**

The Objective of this Policy is to serve as a Guiding Charter to the Management to ensure the timely and adequate disclosure of event or information to the investor community under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, to enable them to take well informed investment decisions with regards to the Securities of the Company.

## **C. DEFINITIONS**

All the Words and expressions used in this Policy, unless defined hereinafter, shall have meaning respectively assigned to them under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and in the absence of its definition or explanation therein, as per the Companies Act, 2013 and the Rules, Notifications and Circulars issued thereunder, as amended from time to time.

- a. “**Act**” means the Companies Act, 2013 (and the Rules) and the Companies Act, 1956 to the extent applicable.
- b. “**Board of Directors**” means the Board of Directors of the Company.
- c. “**Company**” means Pharmaids Pharmaceuticals Limited.

- d. **“Key Managerial Personnel”** means Key Managerial Personnel as defined under Sub-section (51) of Section 2 of the Companies Act, 2013.
- e. **“Listing Regulations”** or **“Regulations”** means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- f. **“Policy”** means this Policy, as amended from time to time.
- g. **“SEBI”** means the Securities and Exchange Board of India.
- h. **“Rules”** means the rules made under the Companies Act, 2013.

**D. EVENTS WHICH ARE DEEMED TO BE MATERIAL EVENT**

The Company shall disclose all such Events which are specified in Para A of Annexure A forming part of this Policy, within the timeline specified therein from the occurrence of event or information without any application of the Guidelines for Materiality as provided in Sub-Regulation (4) of Regulation 30 of the Listing Regulations.

Provided that in case the disclosure is made after the timeline specified in the Listing Regulations including any circulars/amendments issued in this regard, of such occurrence of the event, the Company shall, along with such disclosure(s) provide an explanation for the delay.

The Company shall, with respect to disclosures referred to in Annexure A forming part of this policy, make disclosures updating material developments on a regular basis, till such time the event is resolved, with relevant explanations.

The Company shall disclose on its website all such Event or information which has been disclosed to the Stock Exchange(s) under this Regulation, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the Archival Policy of the Listed Entity, as disclosed on its website. The Company shall disclose all Event or information with respect to Subsidiaries which are material for the Listed Entity.

**E. EVENTS WHICH ARE DEPENDENT ON APPLICATION OF GUIDELINES FOR MATERIALITY**

The Company shall disclose all such Material Events pertaining to itself or its Subsidiary(ies), specified in Para B of Annexure A forming part of this Policy subject to application of Guidelines for Materiality.

**Guidelines for Determining Materiality:**

- the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
- 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.
- the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
  - a. **two percent of turnover**, as per the last audited consolidated financial statements of the listed entity.
  - b. **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.
  - c. **five percent** of the average absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the listed entity.
- 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 listed entity, the event or information is considered material.

**F. GUIDANCE ON WHEN AN EVENT / INFORMATION IS DEEMED TO BE OCCURRED.**

- The Event/Information shall be said to have occurred upon receipt of approval of Board of Directors /Shareholders as whenever required.
- In the Event/Information such as natural calamities, disruption etc. can be said to have occurred when the Company becomes aware of the Event / Information, or as soon as, an Officer of the Entity has, or ought to have reasonably come into possession of the information in the course of the performance of his duties.

**G. DISCLOSURE FRAMEWORK**

The Company shall first disclose to the stock exchanges all events or information which are material in terms of the provisions of this regulation as soon as reasonably possible and in any case not later than the following:

- i. thirty minutes from the closure of the meeting of the Board of Directors in which the decision pertaining to the event or information has been taken :

Provided that in case the meeting of the Board of Directors closes after normal trading hours of that day but more than three hours before the beginning of the normal trading hours of the next trading day, the listed entity shall disclose the decision pertaining to the event or information, within three hours from the closure of the board meeting:

Provided further that in case the meeting of the board of directors is being held for more than one day, the financial results shall be disclosed within thirty minutes or three hours, as applicable, from closure of such meeting for the day on which it has been considered.

- ii. twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the listed entity;
- iii. twenty-four hours from the occurrence of the event or information, in case the event or information is not emanating from within the listed entity:

Provided further that disclosure with respect to events for which timelines have been specified in Part A of Schedule III shall be made within such timelines as may be prescribed in the Regulations or Circular issued from time to time: Provided further that in case the disclosure is made after the timelines specified under this regulation, the listed entity shall, along with such disclosure provide the explanation for the delay.

**H. AUTHORIZE KEY MANAGERIAL PERSONNEL FOR THE PURPOSE OF DETERMINING MATERIALITY OF AN EVENT OR INFORMATION AND FOR THE PURPOSE OF MAKING DISCLOSURES TO THE STOCK EXCHANGE**

The following KMPs are hereby severally authorized by the Board of Directors for the purpose of determining materiality of an event or information and for the purpose of making disclosures to the Stock Exchange(s) (“Authorized Person(s)”) and to suo-moto clarify / deny any report event or information, which has been made public by any means including but not limited to electronic means. They are further authorised to respond to the rumors amongst the general public, if such response will protect the interests of the Company. Such action taken by the KMP shall however, be brought to the attention of the Board of Directors at its immediately subsequent meeting:

Name	Designation
Mr. Venu Madhava Kaparthy	Whole Time Director
Mr. Balagangadhara B C	Chief Financial Officer
Mr. Prasanna S Bhat	Company Secretary & Compliance Officer

Contact Details of the above mentioned KMP has been disclosed to Stock Exchange and also available on the Company’ website.

**I. AMENDMENTS**

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.

However, no such amendment or modification shall be inconsistent with the applicable provisions of any law, for the time being in force.

**J. SCOPE AND LIMITATION**

In the event of any conflict between the provisions of this Policy and the Companies Act, 2013 or the Listing Regulations or any other statutory enactments or Rules, the provisions of Companies Act, 2013/ Listing Regulations or Statutory Enactments, Rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

**K. DISSEMINATION**

This Policy shall be hosted on the website of the Company. ([www.pharmaids.com](http://www.pharmaids.com))

**Part A: Disclosures of Event or Information**

The following shall be Event / Information, upon occurrence of which Company shall make disclosure to the Stock Exchange(s);

**PARA A**

Event which shall be disclosed without any application of the Guidelines for Materiality as specified in Sub-Regulation (4) of Regulation (30):

1. Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation, merger, demerger or restructuring), sale or disposal of any unit(s), division(s), whole or substantially the whole of the undertaking(s) or subsidiary of the listed entity, sale of stake in associate company of the listed entity or any other restructuring.

Explanation (1): the word 'Acquisition' shall mean:

- (i) Acquiring Control, whether directly or indirectly; or,
- (ii) Acquiring or agreement to acquire shares or voting rights in a company, whether existing or to be incorporated, whether directly or indirectly, such that –
  - a. the Company holds Shares or Voting Rights aggregating to Twenty Percent or more of the Shares or Voting Rights in the said Company; or
  - b. There has been a change in holding from the last disclosure made under sub-clause (a) of Clause (ii) of the Explanation to this sub-para and such change exceeds Five Percent of the Total Shareholding or Voting Rights in the said company
  - c. the cost of acquisition or the price at which the shares are acquired exceeds the threshold specified in sub-clause (c) of clause (i) of sub-regulation (4) of regulation 30 of Listing Regulations.

Provided that acquisition of shares or voting rights aggregating to five percent or more of the shares or voting rights in an unlisted company and any change in holding from the last disclosure made under this proviso exceeding two per cent of the total shareholding or voting rights in the said unlisted company shall be disclosed on a quarterly basis in the format as may be specified.

Explanation (2): “sale or disposal of subsidiary” and “sale of stake in associate company” shall include:

- (i) An agreement to sell or sale of shares or voting rights in a company such that the company ceases to be a wholly owned subsidiary, a subsidiary or an associate company of the listed entity; or

- (ii) An agreement to sell or sale of shares or voting rights in a subsidiary or associate company such that the amount of the sale exceeds the threshold specified in subclause (c) of clause (i) of sub-regulation (4) of regulation 30.

Explanation (3): For the purpose of this sub-paragraph, “undertaking” and “substantially the whole of the undertaking” shall have the same meaning as given under section 180 of the Companies Act, 2013.

2. Issuance or Forfeiture of Securities, Split or Consolidation of shares, Buy-back of Securities, any restriction on transferability of Securities or alteration in terms or structure of existing Securities including Forfeiture, Reissue of Forfeited Securities, Alteration of Calls, Redemption of Securities.

3. New Rating(s) or Revision in Rating (s).

4. Outcome of Meetings of the Board of Directors:

The listed entity shall disclose to the Exchange(s), the outcome of meetings of the board of directors held to consider the following:

- a) Dividends recommended or declared or the decision to pass any Dividend and the date on which Dividend shall be paid / dispatched.
- b) Any cancellation of Dividend with reasons thereof.
- c) Decision on Buy-back of Securities.
- d) Decision with respect to Fund raising proposed to be undertaken including by way of issue of securities (excluding security receipts, securitized debt instruments or money market instruments regulated by the Reserve Bank of India), through further public offer, rights issue, American Depository Receipts/ Global Depository Receipts/ Foreign Currency Convertible Bonds, qualified institutions placement, debt issue, preferential issue or any other method;
- e) increase in capital by issue of bonus shares through capitalization including the date on which such bonus s shares shall be credited/dispatched;
- f) Reissue of Forfeited Shares or Securities, or the Issue of Shares or Securities held in Reserve for Future Issue or the creation in any form or manner of New Shares or Securities or any other Rights, Privileges or Benefits to subscribe to;
- g) Short particulars of any other alterations of Capital, including Calls.
- h) Financial Results.
- i) Decision on Voluntary Delisting by the Company from the Stock Exchange(s).

5. Agreements (viz. Shareholder Agreement(s), Joint Venture Agreement(s), Family Settlement Agreement(s) (to the extent that it impacts Management and Control of the Listed Entity), Agreement(s) / Treaty(ies) / Contract(s) with Media Companies) which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.



- 5A. Agreements entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the listed entity or of its holding, subsidiary or associate company, among themselves or with the listed entity or with a third party, solely or jointly, which, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or impose any restriction or create any liability upon the listed entity, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the listed entity is a party to such agreements

Provided that such agreements entered into by a listed entity in the normal course of business shall not be required to be disclosed unless they, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or they are required to be disclosed in terms of any other provisions of these regulations.

Explanation: For the purpose of this clause, the term “directly or indirectly” includes agreements creating obligation on the parties to such agreements to ensure that listed entity shall or shall not act in a particular manner.

6. Fraud / defaults by the Company, its promoter, director, key managerial personnel, senior management or subsidiary or arrest of key managerial personnel, senior management, promoter, or director of the listed entity, whether occurred within India or abroad:

For the purpose of this sub-paragraph:

‘Fraud’ shall include fraud as defined under Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.

‘Default’ shall mean non-payment of the interest or principal amount in full on the date when the debt has become due and payable.

Explanation 1- In case of revolving facilities like cash credit, an entity would be considered to be in ‘default’ if the outstanding balance remains continuously in excess of the sanctioned limit or drawing power, whichever is lower, for more than thirty days.

Explanation 2- Default by a promoter, director, key managerial personnel, senior management, subsidiary shall mean default which has or may have an impact on the listed entity.

Explanation 3 - Fraud by senior management, other than who is promoter, director or key managerial personnel, shall be required to be disclosed only if it is in relation to the listed entity.

7. Change in Directors, Key Managerial Personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.), Senior management, Auditor and Compliance Officer.
- 7A. In case of resignation of the auditor of the Company, detailed reasons for resignation of auditor as given by the said auditor, shall be disclosed by the Company to the stock exchanges as soon as possible but not later than twenty-four hours of receipt of such reasons from the auditor.

7B. Resignation of independent director including reasons for resignation: In case of resignation of an independent director of the Company, within seven days from the date of resignation, the following disclosures shall be made to the stock exchanges by the listed entities:

- i. The letter of resignation along with detailed reason for the resignation as given by the said director
- ii. Names of listed entities in which resigning director holds directorships, indicating the category of directorship and membership of board committees, if any
- iii. The Independent director shall, along with the detailed reasons, also provide confirmation that there is no other material reasons other than those provided.
- iv. The confirmation as provided by the independent director above shall also be disclosed by the Company to the Stock Exchange along with the disclosure specified in sub clause (i) and (ii) above

7C. In case of resignation of key managerial personnel, senior management, Compliance Officer or director other than an independent director; the letter of resignation along with detailed reasons for the resignation as given by the key managerial personnel, senior management, Compliance Officer or director shall be disclosed to the stock exchanges by the listed entities within seven days from the date that such resignation comes into effect.

7D. In case the Managing Director or Chief Executive Officer of the listed entity was indisposed or unavailable to fulfil the requirements of the role in a regular manner for more than forty-five days in any rolling period of ninety days, the same along with the reasons for such indisposition or unavailability, shall be disclosed to the stock exchange(s).

8. Appointment or Discontinuation of Share Transfer Agent.

9. Resolution plan/Restructuring in relation to loans/borrowings from banks/financial institutions including the following details:

- i. Decision to initiate resolution of loans/borrowings.
- ii. Signing of Inter-Creditors Agreement (ICA) by lenders
- iii. Finalization of Resolution Plan
- iv. Implementation of Resolution Plan
- v. Salient features, not involving commercial secrets, of the resolution/restructuring plan as decided by lenders.

10. One time settlement with a bank.

11. Winding-up petition filed by any party / creditors.

12. Issuance of Notices, Call Letters, Resolutions, and Circulars sent to Shareholders, Debenture Holders or Creditors or any class of them or advertised in the media by the Listed Entity.

13. Proceedings of Annual and Extra-ordinary General Meetings of the Listed Entity.

14. Amendments to memorandum and articles of association of listed entity, in brief.

15. (i) Schedule of Analyst or Institutional Investor meet at least two working days in advance (excluding the date of the intimation and the date of the meet) and presentations made by the listed entity to analysts or institutional investors.

(ii) Presentations prepared by the listed entity for analysts or institutional investors meet, post earnings or quarterly calls shall be disclosed to the recognized stock exchanges prior to beginning of such events.

Explanation I: For the purpose of this clause “meet” shall mean group meetings or group conference calls conducted physically or through digital means.

Explanation II: Disclosure of names in the schedule of analysts or institutional investors meet shall be optional for the listed entity.

b) Audio recordings, video recordings, if any, and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means, in the following manner:

i. The audio recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier;

ii. the video recordings, if any, shall be made available on the website within forty-eight hours from the conclusion of such calls;

iii. the transcripts of such calls shall be made available on the website along with simultaneous submission to recognized stock exchanges within five working days of the conclusion of such calls.

16. The following events in relation to the corporate insolvency resolution process (CIRP) of a listed corporate debtor under the Insolvency Code:

a. Filing of application by the corporate applicant for initiation of CIRP, also specifying the amount of default;

b. Filing of application by financial creditors for initiation of CIRP against the corporate debtor, also specifying the amount of default;

c. Admission of application by the Tribunal, along with amount of default or rejection or withdrawal, as applicable ;

d. Public announcement made pursuant to order passed by the Tribunal under section 13 of Insolvency Code;

e. List of creditors as required to be displayed by the corporate debtor under regulation 13(2)(c) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;

f. Appointment/ Replacement of the Resolution Professional;

g. Prior or post-facto intimation of the meetings of Committee of Creditors;

- h. Brief particulars of invitation of resolution plans under section 25(2)(h) of Insolvency Code in the Form specified under regulation 36A(5) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;
- i. Number of resolution plans received by Resolution Professional;
- j. Filing of resolution plan with the Tribunal;
- k. Salient features, not involving commercial secrets, of the resolution plan approved by the Tribunal, in such form as may be specified;
- l. Specific features and details of the resolution plan as approved by the Adjudicating Authority under the Insolvency Code, not involving commercial secrets, including details such as:
  - i. Pre and Post net-worth of the company.
  - ii. Details of assets of the company post CIRP;
  - iii. Details of securities continuing to be imposed on the companies' assets;
  - iv. Other material liabilities imposed on the company;
  - v. Detailed pre and post shareholding pattern assuming 100% conversion of convertible securities;
  - vi. Details of funds infused in the company, creditors paid-off;
  - vii. Additional liability on the incoming investors due to the transaction, source of such funding etc.;
  - viii. Impact on the investor – revised P/E, RONW ratios etc.
  - ix. Names of the new promoters, key managerial persons(s) key managerial personnel, if any and their past experience in the business or employment. In case where promoters are companies, history of such company and names of natural persons in control;
  - x. Brief description of business strategy.
- m. Approval of resolution plan by the Tribunal or rejection, if applicable;
- n. Proposed steps to be taken by the incoming investor/acquirer for achieving the MPS;
- o. Quarterly disclosure of the status of achieving the MPS;
- p. The details as to the delisting plans, if any approved in the resolution plan.

17. Initiation of Forensic audit: In case of initiation of forensic audit, (by whatever name called), the following disclosures shall be made to the stock exchanges by listed entities

- a) The fact of initiation of forensic audit along-with name of entity initiating the audit and reasons for the same, if available
- b) Final forensic audit report (other than for forensic audit initiated by regulatory/enforcement agencies) on receipt by the listed entity along with comments of the management, if any.

Explanation- For the purpose of this sub-paragraph, forensic audit refers to the audits, by whatever name called, which are initiated with the objective of detecting any mis-statement in financial statements, mis-appropriation, siphoning or diversion of funds and does not include audit of matters such as product quality control practices, manufacturing practices, recruitment

practices, supply chain process including procurement or other similar matters that would not require any revision to the financial statements disclosed by the listed entity

18. Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel, or senior management of a listed entity, in relation to any event or information which is material for the listed entity in terms of regulation 30 of these regulations and is not already made available in the public domain by the listed entity.

Explanation – “social media intermediaries” shall have the same meaning as defined under the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

19. Action(s) initiated, or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the listed entity, in respect of the following:
- (a) search or seizure; or
  - (b) re-opening of accounts under section 130 of the Companies Act, 2013; or
  - (c) investigation under the provisions of Chapter XIV of the Companies Act, 2013;

along with the following details pertaining to the actions(s) initiated, taken or orders passed:

- i. name of the authority.
  - ii. nature and details of the action(s) taken, initiated or order(s) passed;
  - iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority;
  - iv. details of the violation(s)/contravention(s) committed or alleged to be committed.
  - v. impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible.
20. Action(s) taken or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the listed entity, in respect of the following:
- a. suspension;
  - b. imposition of fine or penalty;
  - c. settlement of proceedings;
  - d. debarment;
  - e. disqualification;
  - f. closure of operations;
  - g. Sanctions imposed;
  - h. warning or caution; or
  - i. any other similar action(s) by whatever name called; along with the following details pertaining to the actions(s), taken or orders passed:

- i. name of the authority;

- ii. nature and details of the action(s) taken, or order(s) passed;
- iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority;
- iv. details of the violation(s)/contravention(s) committed or alleged to be committed;
- v. impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible.

Explanation- Imposition of fine or penalty shall be disclosed in the following manner along with the details pertaining to the action(s) taken or orders passed as mentioned in the subparagraph:

- (i) disclosure of fine or penalty of rupees one lakh or more imposed by sectoral regulator or enforcement agency and fine or penalty of rupees ten lakhs or more imposed by other authority or judicial body shall be disclosed within twenty four hours.
- (ii) (ii) disclosure of fine or penalty imposed which are lower than the monetary thresholds specified in the clause (i) above on a quarterly basis in the format as may be specified.

**21.** Voluntary revision of financial statements or the report of the board of directors of the listed entity under section 131 of the Companies Act, 2013.

## **PARA B**

### **Event which shall be Disclosed upon application of the guidelines for Materiality referred to Clause E**

1. Commencement or any postponement in the date of commencement of Commercial Production or Commercial Operations of any unit / division.
2. Any of the following events pertaining to the listed entity:
  - a) arrangements for strategic, technical, manufacturing, or marketing tie-up; or
  - b) adoption of new line(s) of business; or
  - c) closure of operation of any unit, division or subsidiary (in entirety or in piecemeal)
3. Capacity addition or product launch.
4. Awarding, Bagging / receiving, amendment or termination of Awarded / Bagged Orders / Contracts not in the normal course of business.

5. Agreements (viz. Loan Agreement(s) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
6. 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 Event such as strikes, lockouts etc.
7. Effect(s) arising out of change in the Regulatory Framework applicable to the Listed Entity.
8. Pendency of any Litigation(s) / Dispute(s) or the outcome thereof which may an impact on the listed entity.
9. Fraud / defaults by employees of the listed entity which has or may have an impact on the listed entity.
10. Option to purchase Securities including any ESOP/ESPS Scheme.
11. Giving Guarantees or Indemnity or becoming a surety, by whatever name called, for any third party.
12. Granting Withdrawal, Surrender, Cancellation or Suspension of Licenses or Regulatory Approvals.
13. Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority

#### **PARA C**

Any other Information / Event: The Company shall disclose major developments that are likely to affect business, 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 Company to appraise its position and to avoid the establishment of a false market in such securities.

#### **PARA D**

Without prejudice to the generality of para (A), (B) and (C) above, the Company may make disclosure of other event / information as specified by the Board from time to time.