

## **AstraZeneca Pharma India Limited**

### **POLICY ON DETERMINATION OF MATERIALITY OF AN EVENT/INFORMATION**

#### **1. Purpose and Objective:**

AstraZeneca Pharma India Limited (“the Company”), being a listed entity, is obliged to make disclosures of any material events or information under and in accordance with regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015 (“the Regulations”).

This Policy is framed by the Board of Directors of the Company (“the Board”) for determination of the materiality of events or information to be disclosed by the Company pursuant to and in accordance with the Regulations.

#### **2. Disclosure of material events or information by the Company and authorisation for determination of materiality and making disclosures:**

2.1 The Company shall make a disclosure of all events specified in Para A of Part A of Schedule III to the Regulations which are reproduced in Annexure - A to this Policy, such events being deemed to be material events and as such mandatorily required to be disclosed by it without applying the criteria for determination of materiality of events / information referred to in regulation 2.2 below.

2.2 The Company shall also make a disclosure of events specified in Para B of Part A of Schedule III to the Regulations which are reproduced in Annexure - B to this Policy based on the criteria for determination of materiality of events / information specified in Sub-regulation 4(i) of regulation 30 of the Regulations.

2.3 In addition to the events / information referred to in clauses 2.1 and 2.2 above, the Company shall also make a disclosure of any events or information which, in the opinion of the Board, is considered material.

- 2.4 The Board has duly authorised the following Key Managerial Personnel, namely, the Managing Director, the Company Secretary and the Chief Financial Officer, of the Company for the time being, jointly and severally to (a) determine on behalf of the Company the materiality of any events or information, (b) make the required disclosures on behalf of the Company for such material events or information to Stock Exchange(s) and of updated material developments on a regular basis till such time as the event is resolved / closed with relevant explanations, (c) provide specific and adequate reply on behalf of the Company to all queries raised by Stock Exchange(s) with respect to any events or information, and (d) confirm or deny, on his / their own initiative, any reported event or information to the Stock Exchange(s).
- 2.5 Notwithstanding the provisions of clause 2.4 above, the Company Secretary for the time being shall be the primary Key Managerial Personnel to make all disclosures to the Stock Exchange(s) required to be made in terms of the authority conferred under clause 2.4 above and, in his absence for any reason, the Managing Director and/ or the Chief Financial Officer shall then make all such disclosures to the Stock Exchange(s).
- 2.6 All disclosures made to the Stock Exchange(s) by the Company Secretary and, in his absence for any reason, by the Managing Director and/ or the Chief Financial Officer shall be duly signed and dated by the Company Secretary, the Managing Director and/ or the Chief Financial Officer, as the case may be.
- 2.7 The Company shall first disclose to stock exchange(s) of all events, as specified in Part A of Schedule III, or information as soon as reasonably possible and not later than twenty-four hours from the occurrence of event or information: Provided that in case the disclosure is made after twenty four hours of occurrence of the event or information, the Company shall, along with such disclosures provide explanation for delay. Provided further that disclosure with respect to events specified in sub-para4 of Para A of Part A of Schedule III shall be made within thirty minutes of the conclusion of the board meeting.

**3 Guidelines for determining materiality of Events / Information:**

- 3.1 Where any employee of the Company has or acquires knowledge of an event or information which is, or is likely to be considered, of a material nature as envisaged by the Regulations or this Policy, such employee shall forthwith notify the same to the concerned Business Head /

Manager / Functional Heads of the Company who in turn shall promptly convey the same to the Company Secretary, and in his absence for any reason, to the Managing Director and / or the Chief Financial Officer of the Company.

3.2 Should the Company Secretary, and in his absence for any reason, the Managing Director and/ or the Chief Financial Officer, after review of any such event or information conveyed to him as provided in clause 3.1 above, also consider that the same is of a material nature as envisaged by the Regulations or this Policy, he shall disclose the material event or information to the Stock Exchange(s).

3.3 No media / public announcement/ publication shall be made by or on behalf of the Company of, or related to, a material event or information until after the same has been first approved by the Company Secretary and, in his absence for any reason, by the Managing Director and/ or Chief Financial Officer of the Company.

**4. Amendments to Policy:**

This Policy may be amended by the Board from time to time if and when considered necessary, provided that no such amendments shall be valid or effective which are contrary to or inconsistent with the Regulations.

**5. Hosting of information on the website of the Company:**

This Policy, all amendments thereto and disclosures made by or on behalf of the Company of events or information to the Stock Exchange(s) under or pursuant to the Regulations or this Policy, shall be hosted on the Company's website for a minimum period of five years in accordance with the Regulations.

This Policy shall come into force and effect on and from 1<sup>st</sup> December, 2015.

***Policy last amended on August 13, 2018***