

POLICY FOR DETERMINING MATERIAL INFORMATION

Pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

PREFACE:

The Policy for determination of materiality of events or information (“Policy”) for disclosure to the Stock Exchanges is framed in accordance with the requirements of the Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”). The Board may review and amend this policy from time to time.

The purpose of this policy is to ascertain the requirement of disclosure of events or information to stock exchange(s) and defining criteria for determining materiality of events and information specified under clause (i) of sub- regulation (4) of regulation 30 of Regulations.

OBJECTIVE:

The main objective of this policy is to determine the events and information which in the opinion of the Board are Material and needs to be disclosed to the Stock exchange and to provide guidance to the Board of Directors, KMPs and other executives and staff working in the Company in making decisions and undertaking regarding its Responsibility about making public such events / information which may materially affect the performance of the company and thereby the share prices of the Company.

Accretion Pharmaceuticals Limited being a listed entity, is obligated to comply with the disclosure requirements under the Listing Regulations and is committed to the premise that the all persons investing in the publicly traded securities have equal right to access information that may affect their investment decisions and believes that full and fair disclosure of material information to the public is the cornerstone to the integrity of the Capital Market.

DISCLOSURES OF EVENTS OR INFORMATION:

- A. The Company shall disclose all such material events which are specified in Para A of part A of Schedule III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- B. The Company shall disclose all such material events specified in Para B of part A of Schedule III of the SEBI (listing Obligations and Disclosure Requirements) Regulations, 2015, subject to application of guidelines for materiality.

CRETERIA FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION:

The Company shall consider the following criteria for determination of materiality of event or 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. 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 listed entity, the event or information is considered material.

TIME LIMIT FOR DISCLOSURE OF EVENT OR INFORMATION TO THE STOCK EXCHANGE:

The Company shall make disclosures of material information to the Stock Exchanges within the time as specified in Regulation 30 of the Listing Regulations, as amended from time to time.

Provided further that disclosure with respect to events specified in sub-Para 4 of Para A of part A of Schedule III shall be made within thirty minutes of the conclusion of the Board Meeting.

The Company shall disclose on its website all such events or information which has been disclosed to stock exchange under this policy.

AUTHORIZATION TO KMP'S TO SUO MOTO ACCEPT/DENY REPORTED EVENT OR INFORMATION:

The Key Managerial Personnel of the Company jointly and severally are authorised to provide adequate reply to all queries raised by stock exchange with respect to any events / information and may on their own initiative also, confirm or deny any reported event or information to stock exchange.

COMPLIANCE OFFICER:

The Compliance Officer for the Purpose of complying with the provisions of LODR, 2015 shall be the Company Secretary of the Company.

REVIEW OF THE POLICY:

The Board of directors of the company shall review the policy on timely basis.