

KMC SPECIALITY HOSPITALS (INDIA) LIMITED

CIN: L85110TN1982PLC009781

NO: 6, ROYAL ROAD, CANTONMENT, TRICHY, TAMIL NADU 620001

**POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF
EVENTS OR INFORMATION**

**POLICY ON DETERMINATION OF MATERIALITY FOR DISCLOSURE OF EVENTS OR
INFORMATION
KMC SPECIALITY HOSPITALS (INDIA) LIMITED**

1. PREFACE

The Board of Directors (the "Board") of KMC SPECIALITY HOSPITALS (INDIA) LIMITED (the "Company") is obliged to form a Policy for determination of Materiality of events or information which are required to be disclosed to the Stock Exchanges in terms of Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (The Policy).

This Policy has been formulated in accordance with Clause (ii) of sub-regulation (4) of Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. APPLICABILITY

The Policy is applicable to KMC SPECIALITY HOSPITALS (INDIA) LIMITED (the "Company").

3. OBJECTIVES

- To maintain transparency and disclosure of material events / information of the Company to its stakeholders
- To define the time span for disclosure of material events / information.
- To provide guidelines for making decisions for disclosure of material events / information.

4. DISCLOSURE OF EVENTS OR INFORMATION

The following shall be the events / information, upon the occurrence of which the Company shall disclose to the Stock Exchange:

- (a) The events specified in Para A of Part A of Schedule III of "LODR", are deemed to be material events and the Company shall disclose such events or information to the Stock Exchanges without any application of guidelines for materiality
- (b) Based on the application of the guidelines for materiality as specified in Regulation 30(4), the Board of Directors of the Company shall consider the following criteria for determination of materiality of events/ information for disclosures specified in Para B of Part A of Schedule III:

- I. The omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly;
- II. The omission of an event or information which is likely to result in significant market reaction if the said omission came to light at a later date;
- III. In case where the criteria specified in the above points 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.

(c) Para C of Part A of the Schedule III of "LODR"

Any other information/event 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 Company to appraise its position and to avoid the establishment of a false market in such securities.

(d) Para D of Part A of the Schedule III of "LODR" Without prejudice to the generality of the above, the Company may make disclosures of event/information as specified by the Board from time to time.

5. AUTHORISATION TO DETERMINE MATERIALITY OF AN EVENT OR INFORMATION

SI No	Designation	Authorised to
1	Managing Director	Determine materiality & disclose to stock exchanges
2	CFO	Determine materiality & disclose to stock exchanges
3	Any other KMP authorized by the Board	Determine materiality & disclose to stock exchanges
4	Company Secretary	Disclose to stock exchanges

6. PROCEDURAL GUIDELINES FOR DETERMINATION OF MATERIALITY OF EVENTS/ INFORMATION

Where the Board of directors of the Company are not certain about materiality of event / information, the same may be referred for external legal advice.

The procedure to be followed in relation to the lodgement of announcement of material event / information is as follows:

- i. Prepare draft announcement to the Stock Exchange: If the event / information is material, the Company Secretary will prepare draft announcement to the Stock Exchanges which is factual and expressed in clear manner and obtain approval of the Managing Director of the Company.
- ii. Lodge Announcements: The Company Secretary on behalf of the Company will lodge or arrange for lodgement of the announcement with the Stock Exchange.
- iii. Post announcement on website: After lodgement of the announcement with the Stock Exchange, the Company Secretary will arrange to place it on the website of the Company.

All the announcements made under this Policy shall be kept on the website as per the Archival Policy of the Company.

7. COMMUNICATION OF THIS POLICY

This Policy shall be posted on the web-site of the Company.

8. AMENDMENT

The Board of Directors shall make appropriate changes to the above policy as may be deemed expedient taking into account the law for the time being in force.