

**CHENNAI MEENAKSHI  
MULTISPECIALITY HOSPITAL LIMITED**

**POLICY FOR DETERMINATION OF MATERIALITY  
OF EVENTS/ INFORMATION FOR DISCLOSURE TO  
STOCK EXCHANGES**

## **POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION TO STOCK EXCHANGES**

### **1. PREFACE**

Regulation 30 sub regulation (4) clause (ii) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR"/ "SEBI LODR, 2015"/ "Listing Regulations") requires every listed company to formulate and put in place a policy on determination of materiality of events / information that requires appropriate disclosure to the stock exchanges.

Accordingly, the Board of Directors (the "Board") of Chennai Meenakshi Multispeciality Hospital Limited (formerly known as Devaki Hospital Limited) (the "Company") has adopted the policy (the "Policy") and procedures with regard to determination of Materiality of events or information which are required to be disclosed to the Stock Exchanges. Further, in compliance to the latest amendments to the Listing Regulations the Board adopted policy require necessary modifications, hence the Policy approved by the Board on 12<sup>th</sup> August, 2023 stands superseded with new policy effective from 30<sup>th</sup> May, 2024.

### **2. POLICY OBJECTIVE**

2.1 The purpose of this Policy is to determine materiality of events and information based on criteria specified under clause (i) of sub-regulation (4) of Regulation 30 of the Listing Regulations and to ensure that the Company makes disclosure of events / information specified in Para B of Part A of Schedule III of the LODR, based on the application of the guidelines for materiality as stated in the said regulation(s) to the Stock Exchanges.

2.2 All the Words and expressions used in this Policy, unless defined hereinafter, shall have meaning respectively assigned to them under the SEBI's LODR, 2015 and in the absence of its definition or explanation therein, as per the Companies Act, 2013 and the Rules, Notifications and Circulars made/issued thereunder, as amended from time to time.

### **3. DEFINITIONS**

3.1 **Board of Directors or Board** means the Board of Directors of Chennai Meenakshi Multispeciality Hospital Limited, as constituted from time to time.

3.2 **Company** means Chennai Meenakshi Multispeciality Hospital Limited (formerly known as Devaki Hospital Limited).

3.3 **Policy** means Policy for Determination of Materiality of Events/ Information for Disclosure to Stock Exchanges

3.4 **Material Events** are those that are specified in Para A of Part A of Schedule III to the Listing Regulations and as amended from time to time.

3.5 **Other Events** are those as may be decided from time to time and in accordance with Para B of Part A of Schedule III to the Listing Regulations.

3.6 **Listing Regulations** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.

3.7 **Key Managerial Personnel (KMP)** of the Company includes Managing Director, Chief Executive Officer and the Company Secretary, who may be authorized individually or collectively to disclose events to Stock Exchange(s).

#### **4. MATERIAL DISCLOSURES**

The Company shall within the prescribed time disclose all such material events to the Stock Exchanges as:

- a. Specified in Para A of Part A of Schedule III of the Listing Regulations without any application of guidelines for materiality as specified in sub regulation (4) of Regulation 30 of Listing Regulations;
- b. Specified in Para B of Part A of Schedule III of the Listing Regulations subject to application of guidelines for materiality as specified in sub regulation (4) of Regulation 30 of Listing Regulations;
- c. any other events/ information viz. any 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 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; and
- d. any other event/information as may be determined by the Securities Exchange Board of India from time to time.

#### **5. CRITERIA FOR DETERMINING MATERIALITY:**

Materiality shall be determined on case to case basis depending on the specific facts and circumstances relating to the event/ information relevant to the Company. A particular event/ information will be considered as material in nature, if it substantially alters/ impacts the existing composition of revenue/ profits/operations of the Company. The Company shall determine the materiality for the event/ information stated in Para B of part A of Schedule III on the basis of criteria specified in sub regulation (4) of Regulation 30 of Listing Regulations which states as below:

- (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; or
- c) the omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:
  - (1) two percent of turnover, as per the last audited financial statements of the Company;
  - (2) two percent of net worth, as per the last audited financial statements of the Company, except in case the arithmetic value of the net worth is negative;
  - (3) five percent of the average of absolute value of profit or loss after tax, as per the last three audited financial statements of the Company;
- 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:

## **6. GUIDELINES FOR DETERMINING WHEN THE MATERIAL EVENT/ INFORMATION HAS OCCURRED**

- 6.1 The timing of the occurrence of an event and/or availability of information has to be decided on a case-to-case basis.
- 6.2 In case of natural calamities, disruptions, etc. the events/ information can be said to have occurred when the Company becomes aware of the information.
- 6.3 In matters which would depend on the stage of discussion, negotiation or approval, the events/information can be said to have occurred upon receipt of approval by the Board of Directors or after receipt of approval of the Board of Directors and shareholders, as the case may be.

## **7. AUTHORITY FOR DETERMINATION OF MATERIALITY OF EVENTS/ INFORMATION:**

The Key Managerial Personnel (KMPs) of the Company are jointly and/or severally authorized by the Board of Directors of the Company to determine the materiality of an event or information and the Company Secretary is authorised to make disclosures to Stock Exchange(s) under the Listing Regulations.

The contact details of the persons authorised to determine materiality of events and or disclosures under this Policy are -

Mrs. R. Gomathi Managing Director, Contact Number: 044 42938938 E-Mail Id: <a href="mailto:cmmhospitals@gmail.com">cmmhospitals@gmail.com</a>	Dr. V. Krishnamurthy Chief Executive Officer, Contract Number: 044 42938938 E-Mail Id: <a href="mailto:cmmhospitals@gmail.com">cmmhospitals@gmail.com</a>	Mr. Bharatraj Panchal Company Secretary, Contract Number: 044 42938938 E-Mail Id: <a href="mailto:cmmhospitals@gmail.com">cmmhospitals@gmail.com</a>
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#### **8. Website updation / Updates to Stock Exchange(s):**

The Company shall disclose on its website all such events or information which has been disclosed to Stock Exchange(s) under the Listing Regulations and such disclosures shall be hosted on the website of the Company for a minimum period of 5 (five) years and thereafter archived as per the Policy for Preservation of Documents (including Archival Policy) of the Company.

The Compliance Officer of the Company, with respect to the disclosure of any material event/information already made to the Stock Exchange(s), shall make disclosures updating material developments on a regular basis till such time the event is resolved/ closed, with relevant explanations to the Board of Directors and to the Stock Exchange(s). Such updates shall also be hosted on the website of the Company.

The Compliance Officer shall provide specific and adequate reply to all the queries raised by the Stock Exchange(s) with respect to any event or information.

#### **9. AUTHORIZATION TO KMPS TO SUO MOTO ACCEPT/ DENY REPORTED EVENT OR INFORMATION**

The Key Managerial Personnel (KMPs) are jointly and/ or severally authorized to suo moto accept/ deny any report event or information, which has been unauthorized made public by media or by any other means including but not limited to electronic means. They are further authorized to respond to the rumours amongst the general public, which has no basis or documentation, in a way which best protects the interests of the Company. Such action taken by the KMPs shall however, be brought to the attention of the Board of Directors at its immediately subsequent meeting.

#### **10. COMPLIANCE OFFICER**

The Compliance Officer for the purpose of complying with the provisions of the Listing Regulations shall be the Company Secretary of the Company.

The disclosure as required under this Policy shall be made as per timelines specified under LODR and/or applicable circulars issued by SEBI from time to time, and in cases of delay the Company shall, along with such disclosure provide the explanation for delay.

## **11. POLICY REVIEW**

This Policy is approved by the Board of Directors of the company at its meeting held on May 30, 2024.

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to the necessary approvals of the Board of Directors.