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**Park Medi World Limited**  
(Formerly Park Medi World Private Limited)

**CODE OF CORPORATE DISCLOSURE**

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("Regulations") require all companies listed on a stock exchange to establish and publicly disclose a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("UPSI"). In compliance with these regulations, the Company has developed this Code of Corporate Disclosure Practices to ensure the timely, adequate, and uniform disclosure of UPSI, enabling investors to make informed investment decisions regarding the Company's securities.

**A. Oversight and Coordination of UPSI Disclosure**

The responsibility for overseeing and coordinating the disclosure of UPSI shall rest with the Head of Investor Relations, Compliance Officer, or Head of Corporate Communication. Their key responsibilities include:

- (i) Ensuring the timely, adequate, consistent, and universal dissemination of UPSI to prevent selective disclosure.
- (ii) (ii) Educating employees on the Company's disclosure policies and procedures.

All disclosures and dissemination of UPSI, except those mandated by law or required under this Code, shall be subject to prior approval by the Compliance Officer before being made public or published on behalf of the Company.

The Company shall generally refrain from responding to speculative media reports or inquiries concerning its activities. However, it shall provide appropriate and fair responses to queries from regulatory authorities regarding news reports or market rumors.

The Company shall ensure that all material and verified UPSI is disclosed in a timely manner to the stock exchanges where its securities are listed, in accordance with applicable legal requirements, followed by dissemination to the press.

Additionally, the Company shall publish all requisite information on its website, as required by applicable laws and regulations.

**B. Sharing of UPSI for Legitimate Purpose**

Insiders are prohibited from communicating, providing, or granting access to any UPSI to any individual, including other insiders, except where such

communication is necessary for legitimate purposes, the performance of duties, or the fulfillment of legal obligations.

The Company's Policy for Determination of Legitimate Purpose, formulated in accordance with Regulation 3(2A) of the Regulations, as amended, is annexed hereto and forms an integral part of this Code of Corporate Disclosure Practices.

### **C. Handling Breaches of UPSI Disclosure**

If UPSI is disclosed without prior approval—whether due to accidental omission, selective dissemination, inadvertence, or any other reason—by an Employee or Director of the Company, they must immediately inform the Compliance Officer. The Compliance Officer shall take necessary corrective measures, including rectifying the disclosure or making it publicly available if required.

### **D. Disclosure and Dissemination of UPSI During Analyst/Investor Meetings**

- Prior to organizing any analyst or investor meetings, the Company shall issue a press release or publish relevant details on its website.
- Only authorized personnel, designated by the Head of Investor Relations, Compliance Officer, or Head of Corporate Communication, may disclose any information related to the Company's securities to analysts or investors.
- Directors and employees shall share only publicly available information while engaging with analysts or investors. They may also provide insights on industry trends, economic conditions, or geopolitical developments.
- All analyst and investor meetings shall be attended by the Head of Investor Relations, Compliance Officer, Head of Corporate Communication, or their representatives. Other authorized employees may also participate. To prevent misquoting or misrepresentation, the Company may prepare transcripts or arrange for recordings of such discussions.
- Any amendments to the Code of Corporate Disclosure shall be promptly communicated to the stock exchanges in accordance with the applicable regulations.

## **POLICY FOR DETERMINATION OF LEGITIMATE PURPOSE**

[Under Regulation 3(2A) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015]

[Annexure to Code of Corporate Disclosure Practices]

### **1. BACKGROUND**

In the course of its business operations, the Company is required to share data and information with various stakeholders, including healthcare institutions, regulatory bodies, research organizations, intermediaries, and other relevant entities. Such data, if classified as unpublished price-sensitive information (UPSI) and made publicly available, may have a material impact on the market value of the Company's listed securities.

It is imperative that any person in possession of UPSI does not misuse such information for personal gain or provide an undue advantage to any individual or entity. Trading in the securities of the Company by an Insider is strictly governed by the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("Regulations"), as amended from time to time, along with the Company's Code of Conduct for Prevention of Insider Trading and Code for Corporate Disclosure Practices.

This "**Policy for Determination of Legitimate Purpose**" has been formulated by the Board of Directors of the Company pursuant to the amendments introduced in the Regulations in 2018 and is an integral part of the Company's Code for Corporate Disclosure Practices.

### **2. Applicability**

This Policy for Determination of Legitimate Purpose is applicable to all Insider(s).

### **3. Definitions**

The definitions of some of the key terms used in the Policy for Determination of Legitimate Purpose are given below.

- a. "**Connected Person**" means Connected Person as defined under Regulations and shall also include directors and key managerial personnel of the promoters.
- b. "**Insider**" means any person who is
  - i. a Connected Person or
  - ii. in possession of or having access to Unpublished Price Sensitive Information.
- c. "**Promoter**" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure

Requirements) Regulations, 2018 or any modification thereof.

- d. **“Unpublished Price Sensitive Information (“UPSI”)”** means any information, relating to a Company or its Securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of Securities of the Company and includes the following:
- i. financial results;
  - ii. dividends;
  - iii. change in capital structure;
  - iv. mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
  - v. changes in key managerial personnel; and
  - vi. such other information as determined by the Board of Directors/Chief Executive Officer/Chief Operating Officer/Chief Financial Officer/Company Secretary from time to time.

#### **4. Legitimate Purpose**

An Insider shall not share UPSI with any person including other Insider(s) except where such communication is in the ordinary course of business or on a need-to-know basis and in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. An Insider before so sharing the UPSI with any other person shall notify him/her that the information is UPSI and to maintain confidentiality of the same. Further, the Insider shall get a Confidentiality Agreement executed by the recipient of UPSI and forward the same to the Compliance Officer. Designated Persons, who are employees and Directors and bound by the terms of the Code of Conduct in their capacity as employees or Directors, respectively, need not separately execute a Confidentiality Agreement. Legitimate Purpose shall, *inter-alia*, include sharing of UPSI on need-to-know basis by an insider with promoters, partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, etc. provided that such sharing has not been carried out to evade or circumvent the prohibitions under these Regulations.

In following cases which are illustrative in nature, sharing of UPSI would be considered as legitimate purpose:

- i. For investigation, inquiry or request for information by statutory or governmental authorities or any other administrative body recognized by law;
- ii. Under any proceedings or pursuant to any order of courts or tribunals;
- iii. As part of compliance with applicable laws, regulations, rules and requirements;
- iv. Arising out of any contractual obligations or arrangements entered by

the Company set forth in any contract, agreement, arrangement, settlement, understanding or undertaking.

- v. Arising out of business requirement including requirement for the purposes of promoting business of the Company, strategies of business, statutory consolidation requirements or related customary disclosure obligations which may require sharing of UPSI with any outsider or Promoter of the Company, who in turn may share it with their Promoter(s) as well as with their advisors, consultants, intermediaries, fiduciaries, etc.

## **5. Policy Review**

The Policy shall be reviewed periodically in accordance with changes or any regulatory requirements from time to time.

The provisions of this Policy for Determination of Legitimate Purpose have to be read along with the Regulations, as amended from time to time and in case of any inconsistency/contradiction between the two, the provisions of the Regulations shall prevail.

Arising out of business requirement including requirement for the purposes of promoting business of the Company, strategies of business, statutory consolidation requirements or related customary disclosure obligations which may require sharing of UPSI with any outsider or Promoter of the Company, who in turn may share it with their Promoter(s) as well as with their advisors, consultants, intermediaries, fiduciaries, etc.