



APOLLO HOSPITALS ENTERPRISE LIMITED

CIN : L85110TN1979PLC008035

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POLICY FOR DETERMINING MATERIALITY FOR DISCLOSURES



**POLICY FOR DETERMINING MATERIALITY FOR DISCLOSURES
OF
APOLLO HOSPITALS ENTERPRISE LIMITED**

A. INTRODUCTION

The equity shares of Apollo Hospitals Enterprise Limited (the “Company” or “Apollo”) are traded in India on the Bombay Stock Exchange India Limited and the National Stock Exchange.

The requirements under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (Listing Regulations) and other relevant rules and statutes (hereinafter referred to as “the Applicable Laws”) have been considered while drafting this Policy for determining Materiality for Disclosures (the “Policy”)

The Policy applies in respect of disclosure of material events in relation to Apollo, its subsidiaries, Directors, Promoters, Key Managerial Personnel and Senior Management Personnel as required under Applicable Laws. This policy is in addition to, and does not derogate from Apollo’s Code of Conduct for Prevention of Insider Trading which deals with dissemination of Unpublished Price Sensitive Information (also referred to as material non–public information).

B. AUTHORISED PERSONS

The Company Secretary will be the custodian of the disclosure process.

The contact details of the Company Secretary are: -

SM Krishnan

Email:- krishnan_sm@apollohospitals.com

Telephone:- 91 44 28296117

The Company's Key Managerial Personnel shall jointly and/ or severally determine materiality of information/ events and dissemination of the same as covered by this Policy. The Company Secretary who is also the Chief Compliance Officer or his designee, shall in each case, pre-approve in consultation with the Managing Director and the CFO any deviation from the policies and procedures outlined in this Policy. The Company Secretary will be the single point of contact for the above signatories who are authorized to determine materiality and make distributions covered by this Policy.

The Senior Management Personnel and such other persons, as determined by the aforesaid authorized persons shall be relevant employees for the purpose of this policy, to identify potential event or information pertaining to their functional roles and report the same to the aforesaid Authorized Persons.

The Board of Directors, Managing Director, CFO, Key Managerial Personnel, Subsidiary and all other capitalized terms not defined herein shall have the same meaning as assigned to those terms under the Listing Regulations, Companies Act, 2013 or any other applicable laws or regulations as amended from time to time, as the case may be.

C. MATERIALITY ASSESSMENT

Information should be regarded as “material” if there is a substantial likelihood that a reasonable investor would consider such information important in making a decision to buy, sell, or hold a security or where such information is likely to have a significant effect on the market price of the security. Materiality should be determined on a case-to-case basis depending on the facts and circumstances pertaining to the information.

The following criteria will be applicable for determining materiality of an event / 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, which 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:
 - (i) 2% of the turnover, as per the last audited consolidated financial statements of the Company;
 - (ii) 2% of the net worth, as per the last audited consolidated financial statements of the Company, except in case the arithmetic value of the net worth is negative; and
- d) 5% of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company.
- e) In case where the criteria specified in sub-clause (a), (b) and (c) are not applicable, an event/ information may be treated as being material if in the opinion of the Board of the Company, the event/information is considered material.



For the avoidance of doubt, events listed in Para A – Part A of Schedule III of Listing Regulations shall be disclosed without application of materiality criteria. Events or information specified in Para B of Part A of Schedule III of Regulation 30 of the Listing Regulations will be disclosed based on application of the materiality criteria as set forth above.

D. TIMELINES FOR DISCLOSURE

The Company shall disclose all events or information within the timelines specified in the Applicable Laws.

E. DISCLOSURE OF THE POLICY

This Policy will be uploaded on the website of the Company.

F. LIMITATION AND AMENDMENT

In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy, including the criteria of materiality as set forth in paragraph (C) above.