Paras Healthcare Limited

Policy for determination of materiality of events or information[1]

[1] Approved by the Board of Directors in their meeting held on October 26, 2026

POLICY FOR DETERMINATION OF MATERIALITY OF EVENTS OR INFORMATION

I. OBJECTIVE

The objective of this Policy is to determine the event(s) or information(s) which, in the opinion of the Board of Directors of the Company, are considered material and need to be disclosed to the Stock Exchanges, where the securities of the Company are listed, within the time limit as prescribed in this Policy in accordance with Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Listing Regulations"), including any statutory modification(s) or re-enactment thereof from time to time, thereby ensuring a timely and balanced disclosure of all material events concerning the Company.

This Policy shall come into force from the date of listing of the securities of the Company on recognized stock exchanges.

II. DISCLOSURE OF INFORMATION

I. Events or Information which are deemed material to be disclosed

- All events or information, listed under **Para A of Part A of Schedule III** to the Listing Regulations, shall be mandatorily disclosed by the Company to the Stock Exchanges, within the timelines as prescribed under the Listing Regulations and the relevant SEBI Circulars issued in this regard, as applicable, without applying any test of materiality.

- All events or information, listed under **Sub-Para 4 of Para A of Part A of Schedule III** to the Listing Regulations, shall be mandatorily disclosed by the Company to the Stock Exchanges in accordance with the timelines as specified in Regulation 30(6) of the Listing Regulations and relevant SEBI Circulars issued in this regard, as applicable.

- All events or information emanating from within the Company, which are material in terms of Regulation 30 of the Listing Regulations, shall be mandatorily disclosed by the Company to the Stock Exchanges, as soon as possible within a reasonable time of their occurrence of the event or information, but not later than twelve hours from the occurrence of the event or information.

- All events or information not emanating from within the Company, which are material in terms of Regulation 30 of the Listing Regulations, shall be mandatorily disclosed by the Company to the Stock Exchanges, as soon as possible within a reasonable time of their occurrence of the event or information, but not later than twenty four from the occurrence of the event or information.

II. Events or Information which are disclosed subject to materiality

- All events or information, listed under **Para B of Part A of Schedule III** to the Listing Regulations, shall be disclosed by the Company to the Stock Exchanges, subject to the guidelines for materiality along with the details, as soon as possible from the occurrence/information of such event, the omission of an event or information.

- All events or information relating to subsidiary companies of the Company, which has a material impact on the Company, shall be disclosed by the Company to the Stock Exchanges.

- All events or information where guidelines for materiality are not applicable the Company may make disclosure of the same, if in the opinion of the Board of Directors or any other authorized key managerial person of the Company, the event/information is considered material.

- Such other information as may be specified by SEBI, from time to time.

In case there is a delay in disclosing the event/information to the Stock Exchanges, in terms of this Policy, the Company shall provide an appropriate explanation for such delay.

III. GUIDELINES/TEST FOR MATERIALITY

I. Qualitative Approach

The events or information listed in Para B of Part A of Schedule III to the Listing Regulations is considered material if it satisfies any of the following conditions:

(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 a significant market condition reaction if the said omission came to light on a later date.

II. Quantitative Approach

The events or information listed in Para B of Part A of Schedule III to the Listing Regulations is considered material, whose value or the expected impact in terms of value, exceeds the lower of the following:

(a) 2% (two percent) of turnover, as per the last audited consolidated financial statements of the Company;
(b) 2% (two percent) of 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;

(c) 5% (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 Company.

III. In case where the criteria specified above in clause I and II is not applicable, an event or information may be treated as being material if in the opinion of the Board of Directors of the Company, the event or information is considered material.

IV. AUTHORITY FOR DETERMINATION AND DISCLOSURE OF MATERIALITY OF EVENTS AND INFORMATION

The Managing Director, Whole Time Director and the Group Chief Financial Officer, are jointly and/or severally authorized for the purpose of determining the materiality of the events or information listed in Para B of Part A of Schedule III to the Listing Regulations.

All the Key Managerial Personnel (KMPs) of the Company, viz. Managing Director, Whole Time Director, Group Chief Financial Officer and Company Secretary and Compliance Officer shall be jointly and/or severally authorized for the purpose of making disclosures to the Stock Exchanges.

All disclosures made to stock exchanges under this Policy shall also be hosted on the website of the Company for a minimum period of 5 (Five) years and thereafter as per the "Preservation of Documents and Archival Policy" of the Company.

V. DISCRETION TO MAKE DISCLOSURES WHERE MATERIALITY TEST IS NOT SATISFIED

Where the Managing Director, Whole Time Director and Group Chief Financial Officer, either jointly and/or severally are satisfied that although a particular event does not meet the test of materiality, disclosure of information in relation thereto will ensure that investors are better informed with regard to the Company or non-disclosure of such information will distort the market for the Company's securities, such information may be disclosed to the Stock Exchanges under the Listing Regulations.

VI. GUIDANCE ON OCCURRENCE OF AN EVENT OR INFORMATION

The guidelines for determining when an information/event is considered to be occurred are as follows:

(a) **Information emanating within the Company:** Execution of terms, final discussion or approval of Board of Directors and in instances where there is no execution, final discussion or approval will depend upon the meeting when the Responsible Person became aware of such events or information.

(b) **Information or events emanating out of Board Meeting:** The time of closure of the Board

Meeting in which that information or event is approved.

(c) **Information not emanating within the Company:** The events or information can be said to be occurred, as soon as, Officer of the Company became aware of such information or has or ought to have reasonably come into possession of the information in the performance of his duties under the normal course of the Business.

VII. OTHER PROVISIONS RELATING TO DISCLOSURES

1. The Company shall in respect of disclosures made under the Listing Regulations, make disclosures updating material development on a regular basis to the Stock Exchanges, till such time the event is resolved / closed, with relevant explanations.

2. The Company shall provide specific and adequate reply to all queries raised by Stock Exchanges with respect to any events or information provided that the Stock Exchanges shall disseminate information and clarification as soon as reasonably practicable.

3. The Company may, suo moto, confirm or deny any reported event or information in the mainstream media to the Stock Exchanges. However, as per the proviso to the Regulation 30(11) if the Company falls under the specified category as mandated, then clarification or denial of such rumors of an impending specific material event or information circulating in mainstream media amongst the investing public, is to be made as soon as reasonably possible and not later than 24 hours from the reporting of the event or information.

   Further, if the Company confirms the reported event/ information, it shall also provide the current stage of such event or information.

4. In case an event or information is required to be disclosed by the Company in terms of the provisions of this regulation, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the Company shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

VIII. DISCLOSURE OF POLICY

This policy along with the contact details of the persons authorized to determine materiality of events or information and for the purpose of making disclosures to Stock Exchanges shall be disclosed on the Company's website and any updates hereto shall be promptly reflected on the Company's website. The Company shall disclose on its website all such events or information which have been disclosed to the Stock exchanges under this Policy and such disclosures shall be hosted on the website of the Company for a minimum period of five years and, thereafter, as per the "Preservation of Documents and Archival Policy" of the Company.

IX. REVIEW, LIMITATION AND AMENDMENT

The Board of Directors shall review this Policy as may be deemed necessary and in accordance with any regulatory amendments.

In the event of any conflict between the Listing Regulations or any other statutory enactments ("Regulations") and the provisions of this policy, the Regulations shall prevail over this policy.

Any subsequent amendment/modification in the Regulations in this regard, shall automatically apply to this policy.