

# **CONVENIENT HOSPITALS LIMITED**

**CIN: U85110MP1993PLC007654**

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

**Version 1.0  
DECEMBER 2025**

## 1. PREAMBLE AND OBJECTIVE

The “Policy for Determination of Legitimate Purpose (“**the Policy**”) prepared in compliance with Regulation 3(2A) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time and adopted by the Board of Directors of Convenient Hospitals Limited in order to establish a mechanism for sharing of Unpublished Price Sensitive Information in the ordinary course of business by an insider of the Company.

The objective of this Policy is to establish a mechanism for sharing Unpublished Price Sensitive Information in the ordinary course of business for legitimate purposes, while ensuring confidentiality and compliance with insider trading regulations.

## 2. DEFINITIONS

- i. “**Board of Directors or Board**” means the collective body of the Directors of the Company.
- ii. “**Company**” means Convenient Hospitals Limited.
- iii. “**Regulations**” means Securities Exchange Board of India (Prohibition of Insider Trading) (Amendments) Regulations, 2018 including any amendments thereto
- iv. “**UPSI or Unpublished Price Sensitive Information**” means any information, relating to a Company or its Securities, directly or indirectly, that is not generally available which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 the Securities and shall ordinarily include, but not be restricted to, information relating to the following:
  - Financial results.
  - dividends.
  - change in capital structure.
  - mergers, de-mergers, acquisitions, delisting(s), disposals and expansion of business and such other transactions; and
  - changes in key managerial personnel.
- v. “**Insider**” shall have the meaning assigned to it under Regulation 2(1)(g) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

## 3. LEGITIMATE PURPOSE

"Legitimate Purposes" shall mean sharing of UPSI in the ordinary course of business by an Insider with the following:

- i. Promoters of the Company
- ii. Auditors (Statutory, Internal, Branch, Cost, Secretarial, GST and any other Auditor as applicable)
- iii. Staff Members of the Audit firm/team conducting the Audit
- iv. Collaborators
- v. Lenders
- vi. Customers
- vii. Suppliers
- viii. Bankers
- ix. Legal Advisors
- x. Insolvency Professionals

- xi. Consultants
- xii. Any other advisors/consultants/partners
- xiii. Any other person with whom UPSI is shared

Provided that sharing of UPSI shall be strictly on a need-to-know basis and shall not be carried out for the purpose of evading or circumventing the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

#### **4. PROCESS FOR SHARING UPSI**

The insider shall conduct the following steps while sharing UPSI:

- i. Satisfy that information is UPSI and that sharing of UPSI is for legitimate purposes.
- ii. Identify the persons with whom such information is to be shared.
- iii. Notify the recipient that the information that is being shared is UPSI and to maintain confidentiality of such UPSI.
- iv. Mode of sharing UPSI shall be either by an email (addressed directly to the insider without copying) or via hard copy or any by other electronic mode or device or provide access to the information, data, server with due acknowledgement thereof from the recipient.

#### **5. DIGITAL DATABASE**

The Board of Directors shall ensure that a structured digital database is maintained containing the names of such persons or entities with whom UPSI is shared under Regulation 3 along with the Permanent Account Number (PAN) or any other identifier authorized by law, where PAN is not available. Such database shall be maintained with adequate internal controls and checks, such as time stamping, audit trails, etc. to ensure non-tampering of the database. The responsibility for maintaining such structured digital database shall lie with the Compliance Officer.

#### **6. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS**

The Board of Directors shall require the parties to execute agreements containing confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.

#### **7. DISCLOSURE**

- This Policy shall be placed on the Company's website.
- The web-link of the Policy shall be disclosed in the Annual Report, in compliance with Regulation 3(2A).
- This Policy shall be read in conjunction with the Code of Fair Disclosure.

## **8. AMENDMENT**

The Board of Directors of the Company, subject to applicable laws, rules & Regulations, may amend / substitute any provision(s) with a new provision(s) or replace this entire Policy with a new Policy.

In any circumstance where the terms of this Policy differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over this Policy.

This Policy was approved and adopted by the Board on 29<sup>th</sup> December, 2025.