



Hannah Joseph Hospital

(Institute of Neurosciences, Cardiac Sciences, Orthopaedics & Traumatology)

HJHL/BSE/2025-26/05

06/03/2026

To
The Listing Department
BSE Limited
P.J. Towers, Dalal Street,
Mumbai – 400 001

Scrip Code: 544687 | **Symbol:** HANNAH | **ISIN:** INE0JVH01012

Subject: Intimation under Regulation 8(2) of the Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Dear Sir/Madam,

Pursuant to Regulation 8(2) of the Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“SEBI PIT Regulations”), please find attached herewith the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information framed under Regulation 8(1) of SEBI PIT Regulations.

The said Code is also uploaded on the Company’s website i.e., www.hannahjosephhospital.com

This is for your information and records.

Yours faithfully,

For Hannah Joseph Hospital Limited

CS Yuvaraj Saravanan
Company Secretary & Compliance Officer
M.No.: A66149



Hannah Joseph Hospital Limited

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GSTIN : 33AACCH808IRIZ0
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Corporate Office :
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Hannah Joseph Hospital

(Institute of Neurosciences & Trauma)

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Effective from 19-12-2024]

Considered and Approved by the Board of Directors vide resolution dated 19-12-2024.

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Introduction

SEBI has vide notification dated December 6, 2024, amended SEBI (Prohibition of Insider Trading) Regulations, 2015. As required under the said Regulations, Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (hereinafter referred to as the "Code") has been framed for adoption by the Board of Directors of the Company.

The SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations"), as amended from time to time mandates every listed company to formulate and publish on its official website, a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code").

In line with the requirements of law and to ensure compliance, the Board of Directors of Hannah Joseph Hospital Limited ("**Company**") has adopted this Code.

1. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company will make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer appointed under the Regulations shall act as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.

8. The Company will ensure handling of all unpublished price sensitive information on a need-to-know basis.

9. No Unpublished Price Sensitive Information relating to the Company or securities of the Company shall be communicated to any person including other insiders except in furtherance of legitimate purposes as per the "Policy for determination of Legitimate Purposes" (Annexure - A), performance of duties and discharge of legal obligations.

Annexure A

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

[Pursuant to Regulation 3 (2A) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

1. PREFACE

In accordance with the provisions of Regulation 3(2A) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company has formulated this "Policy for determination of Legitimate Purposes" as a part of "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" of the Company formulated under regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015.

2. OBJECTIVE

The objective of this policy is to identify "Legitimate Purposes" which would be considered as exception for the purpose of sharing or procuring unpublished price sensitive information ("UPSI") relating to the Company or its securities, by or from Insider. This Policy also places restrictions on the Recipient of UPSI to deal with such UPSI in accordance with the provisions of the Regulations and not to misuse or make unwarranted use of such UPSI in violation of the Regulations.

3. CHIEF INVESTOR RELATIONS OFFICER ("CIO") TO OVERSEE AND COORDINATE DISCLOSURES:

(i) The Compliance Officer of the Company is designated as the Chief Investor Relations Officer and is responsible for dissemination of information and disclosure of UPSI to the Stock Exchanges and other Regulatory Authorities as may be required under any applicable law for time being in force.

(ii) The Compliance Officer is also responsible for ensuring compliance under this Code, overseeing and coordinating disclosure of UPSI to stock exchanges, shareholders, analysts and media and for educating AIL's staff on disclosure policies and procedure.

(iii) All UPSI is to be handled on "need-to-know basis", ie., UPSI should be disclosed only to those within company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information. All the non public information directly received by any employee should immediately be reported to the Compliance Officer.

4. POWERS & DUTIES OF CHIEF INVESTOR RELATIONS OFFICER:

(i) Other than information which is price sensitive in accordance with the Companies Act 2013, the SEBI (Prohibition of Insider Trading) Regulations, 2015 or any other applicable law for the time being in force, the CIO in consultation with the Managing Director & Chief Financial Officer (CFO) shall decide whether an information is price sensitive or not.

(ii) The CIO shall ensure that uniform disclosures are made to the Stock Exchanges promptly.

(iii) All information disclosure/dissemination may normally be approved in advance by the CIO. In case information is accidentally disclosed without prior approval of CIO, the person responsible shall immediately inform the CIO.

(iv) The CIO shall ensure that no unpublished price sensitive information is disclosed selectively to any one or group of research analysts or investors to the disadvantage of other stakeholders.

(v) Any queries or requests for verification of market rumour(s) by the Regulatory Authorities shall be forwarded to the CIO, who shall decide on the clarification to be provided.

(vi) The CIO shall decide whether a public announcement is necessary for verifying or denying any rumor(s).

5. RESTRICTION ON COMMUNICATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

5.1. The term "legitimate purpose" shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the regulations.

5.2. All other terms used in this Policy but not defined herein shall have meaning ascribed to them under the "Code of Conduct to Regulate, Monitor and Report Trading by Insiders" of the Company.

5.3. Any person in receipt of UPSI pursuant to "legitimate purpose" shall be considered as an "Insider" under the regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with the regulations and shall not otherwise trade in securities of the company

when in possession of UPSI. For the same, notice may be issued to such person by the Insider sharing the UPSI or such person shall sign the confidentiality / non-disclosure agreement with the Insider / Company.

5.4. An Insider can share the UPSI in the ordinary course of business for legitimate purposes with the following persons including the Insiders provided that such sharing has not been carried out to evade or circumvent the prohibitions of the regulations:

- 1) Insiders of the Company including Promoters, Directors and Key Managerial Personnel of the Company;
- 2) Auditors (Statutory, Internal, Branch, Cost, Secretarial, GST and any other Auditor as applicable) and their audit team conducting the respective audit;
- 3) Collaborators
- 4) Lenders
- 5) Customers
- 6) Suppliers
- 7) Bankers
- 8) Legal Advisors
- 9) Insolvency Professionals
- 10) Consultants
- 11) Any other advisors/consultants/partner

5.5. Such person receiving UPSI pursuant to “legitimate purpose” shall be under obligations to comply with the regulations including to prevent mis-use or unwarranted use of such UPSI shared.

6. DIGITAL DATABASE

6.1. The Company will maintain an electronic record (structured digital database) containing the name of person with whom UPSI is shared and nature of the shared UPSI, Permanent Account Number (PAN) or any other identifier authorized by law, where PAN is not available and other information as required under the Regulations. 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.

7. AMENDMENT

7.1. This Policy shall be reviewed and amended from time to time, subject to applicable laws, rules and regulations in accordance with the direction / approval of the Board of Directors of the Company.
