

May 8, 2026

Listing Department, National Stock Exchange of India Limited Exchange Plaza, Bandra-Kurla Complex, Bandra (E), Mumbai – 400 051	Listing Department, BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001
NSE Symbol: ARTEMISMED	Scrip Code: 542919

Sub: Intimation under Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir/Ma'am,

Please find enclosed amended “Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information” approved by the Board of Directors of the Company on May 8, 2026.

The same is also being uploaded on the Company’s website at www.artemishospitals.com/investors.

This is for your information and records.

Thanking you,

Yours faithfully,

For Artemis Medicare Services Limited

Poonam Makkar
Company Secretary & Compliance Officer

Encl.: As above



CODE OF PRACTICES AND PROCEDURES

FOR

FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Effective From : **February 4, 2019**
Last Amended : **May 8, 2026**

ARTEMIS MEDICARE SERVICES LIMITED

Regd. Off.: Plot-14, Sector-20, Dwarka, South-West, Delhi-110075

I. Preamble

In compliance to provisions of Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“**SEBI Insider Trading Regulations**”), the Board of Directors of Artemis Medicare Services Limited (“**AMSL**”/ “the Company”) has formulated and adopted this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“**Code**”).

This Code was initially approved by the Board of the Company at its meeting held on February 4, 2019, effective from that date and was last amended on May 8, 2026.

II. Objective

This Code is required for the Company to ensure timely and adequate disclosure of Unpublished Price Sensitive Information which would impact the price of the Company’s securities, and to maintain the uniformity, transparency and fairness in dealing with all stakeholders and ensuring compliance to all applicable laws and regulations. Further, the Company endeavours to identify and preserve the confidentiality of Unpublished Price Sensitive Information, to prevent misuse of such information.

III. Definitions

- (a) “**Board of Director**” or “**Board**” means the Board of Directors of the Company.
- (b) “**Compliance Officer**” means the Company Secretary of the Company, or any other person so designated from time to time.
- (c) “**Chief Investor Relations Officer**” or “**CIRO**” means the Chief Financial Officer of the Company, or any other person so designated by the Board, from time to time, who shall deal with the dissemination of information and disclosure of UPSI.
- (d) “**Securities**” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof and means the securities of the Company whether listed or proposed to be listed (specifically excluding units of a mutual fund).
- (e) “**Stock Exchanges**” shall mean stock exchanges where the security of the Company are listed.
- (f) “**Unpublished Price Sensitive Information**” or “**UPSI**” means any information as defined under Regulation 2(1)(n) of SEBI Insider Trading Regulations.

Words and expressions used but not defined in this Code but defined in the SEBI Insider Trading Regulation, or Securities and Exchange Board of India Act, 1992, the Securities

Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

IV. Norms to be followed

- 1. Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.**

The Company shall make prompt public disclosure of UPSI that would impact price discovery, no sooner than credible and concrete information comes into being in order to make such information generally available.

- 2. Uniform and universal dissemination of UPSI to avoid selective disclosure.**

UPSI shall be disseminated in a uniform and universal manner by disclosure to the Stock Exchanges and by posting the same on the Company's website i.e. www.artemishospitals.com.

The Company shall use its best endeavours to avoid selective disclosure of UPSI.

- 3. Authority for Dissemination of information and Disclosure of UPSI.**

As an overriding principle, no person in the Company should communicate externally any information about AMSL's prospects, performance and policies or disclose any unpublished information, whether price sensitive or not, without appropriate prior authorisation.

Depending upon the area of communication, there are certain persons in the Company who are authorised to speak with the various target groups based on their expertise, role and a deep understanding of the Company. Unless otherwise approved by the Managing Director, only those people occupying the positions listed below are authorized to discuss Company matters with the news media, investment community, etc. in India and/or overseas ("Authorised Spokespersons"):

- Chairman
- Managing Director
- Chief Financial Officer
- Chief Business Officer
- Head - Investor Relations, M&A and Organization Growth Strategy
- Chief People Officer

4. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

In case any UPSI gets disclosed selectively or inadvertently or otherwise, the CIRO shall promptly make public the said UPSI through dissemination of the same to the Stock Exchanges and by posting the same on the official website of the Company.

5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities. Such response shall be sent to all Stock Exchanges, even if a query has been received from only one of the Stock Exchanges.

Any employee who becomes aware of any such rumour should immediately inform the CIRO. The CIRO will decide on the course of action that may be necessary.

6. Ensuring that information shared with analysts and research personnel is not UPSI.

(i) The Company shall provide only public information to analysts/ research persons/ investor groups/ large investors like institutions (“hereinafter referred “Analysts”). Alternatively, the information given shall be simultaneously made public.

(ii) At least two Authorised Representatives shall be present at all meetings with Analysts and on all conference calls with Analysts, so that misquoting or misrepresentation of actual discussions should be avoided.

7. Developing best practices to make transcripts or records of proceeding of meetings with analysts and other investor relation conferences

The transcript and recordings of proceedings of meetings with Analysts shall be uploaded on the Company’s website, in accordance with the requirements of applicable laws.

8. Handling of all UPSI on a need-to-know basis

All UPSI shall be handled within the Company on a need-to-know basis. The persons, who are privy to UPSI, shall handle the same strictly on a “need to know” basis. This means UPSI shall be communicated only to those persons who need to know the same in furtherance of a legitimate purposes, performance of duties or discharge of legal obligations.

A Person may share UPSI on a need to know basis with any Insider, partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency

professionals or other advisors or consultants and such other persons in the ordinary course of business provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI Insider Trading Regulations.

Limited access to confidential information:

The Persons privy to confidential information shall, in preserving the confidentiality of information, and to prevent its wrongful dissemination, adopt among others, the following safeguards:

- (i) Shall maintain the confidentiality of all UPSI coming into their possession or control.
- (ii) Files containing UPSI/ confidential information shall be kept secure.
- (iii) Computer files must have adequate security of login through a password.
- (iv) Files containing confidential information should be deleted/ destroyed after its use.
- (v) Follow the guidelines and other safeguards for maintenance of electronic records and systems as may be prescribed from time-to-time.

V. Policy for Determination of Legitimate Purpose

The Company has in place a policy for determination of legitimate purpose. The same is attached as **Annexure I** of this Code.

VI. Modifications and conflict

This Code may be amended by the Board from time to time. The Company Secretary being the Compliance Officer is also authorized to make amendment in this Code, where there are any mandatory changes required by the law.

In the events of inconsistency of this Code with SEBI Act or SEBI Insider Trading Regulations or any rules, regulations or circular prescribed thereunder, the relevant provisions of the applicable law shall override this Policy.

In the event of any amendment to the SEBI Insider Trading Regulations, this Code shall consequently stand appropriately amended.

Policy for determination of legitimate purpose

This policy for Determination of Legitimate Purpose (“**the Policy**”) has been framed in compliance to provisions of Regulation 3(2A) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“SEBI Insider Trading Regulations”).

In terms of provisions of the SEBI Insider Trading Regulations, an insider may communicate, provide, or allow access to any Unpublished Price Sensitive Information (“UPSI”), relating to the Company or its securities listed or proposed to be listed, to any person including other insiders, only where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Further, any person may procure from or cause the communication by any insider of UPSI, relating to the Company or its securities listed or proposed to be listed, only in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

The term “legitimate purpose” shall include sharing of UPSI 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 SEBI Insider Trading Regulations.

Whether sharing of UPSI for a particular instance is pursuant to ‘legitimate purpose’ or not would entirely depend on the specific facts and circumstances of each case. Primarily, the following factors should be considered to determine the legitimate purpose:

- a. whether sharing of such information is in the ordinary course of business of the Company;
- b. whether sharing the information is in the best interests of the Company or in furtherance of a genuine commercial purpose;
- c. whether the information is required to be shared for enabling the Company to discharge its legal and/or contractual obligations or performance of duties;
- d. whether the nature of information being shared is commensurate to the purpose for which access is sought to be provided to the recipient.

The UPSI may emanate from any department within the Company and hence the onus shall be on the concerned Head of Department (HOD) who is the originator of such UPSI to justify the need to share it on behalf of the Company with other person on the basis of their functional/legal requirement.

Any person in receipt of UPSI pursuant to a ‘legitimate purpose’ shall be considered ‘Insider’ for the purposes of SEBI Insider Trading Regulations and due notice shall be given to such person to maintain confidentiality of such UPSI in compliance with the SEBI Insider Trading Regulations.

A structured digital database shall be maintained containing the nature of UPSI and the names of such persons who have shared the information and also the names of such persons with whom information is shared along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.
