



**Secretarial compliance report of HealthCare Global Enterprises Limited for the
year ended March 31, 2022**

[Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing
Obligations and Disclosure Requirements) Regulations, 2015]

We have examined:

- (a) all the documents and records made available to us and explanation provided by **HealthCare Global Enterprises Limited** (“the listed entity”);
- (b) the filings/ submissions made by the listed entity to the stock exchanges;
- (c) website of the listed entity;
- (d) any other document / filing, as may be relevant, which has been relied upon to make this certification;

For the year ended March 31, 2022 (“Review Period”) in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars / guidelines issued thereunder, have been examined, include: -

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018



- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to the Company during the Review Period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not Applicable to the Company during the Review Period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(Not Applicable to the Company during the Review Period);**
- (h) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 **(Not Applicable to the Company during the Review Period);**
- (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (j) SEBI (Registrar to the Issue and Share Transfer Agent) Regulations, 1993 regarding the Companies Act and dealing with client;

and based on the above examination, we hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars / guidelines issued thereunder ***except for the case mentioned under point no. (c) below;***
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars / guidelines issued thereunder in so far as it appears from our examination of those records.



(c) The following are the details of actions taken against listed entity by Securities Exchange Board of India under aforesaid Acts / Regulations and circulars/guidelines issued thereunder:

Sl. No.	Action taken by SEBI / Stock Exchanges	Details of violation	Details of action taken e.g., fines, warning letter, debarment etc.,	Observations/ remarks of the Practicing Company Secretary if any
1.	<p>There was a delay of 10 days by the Company in filing the listing application for the allotment of 20,00,000 Equity Shares of Rs. 10/- each, which were allotted on December 08, 2021.</p> <p>Both BSE and NSE have advised the Company to pay fine of Rs. 2,00,000/- each.</p>	<p>Delay of 10 days in filing listing application pursuant to the provisions of clause No. 4(3) of SEBI Circular No. SEBI / HO / CFD / DIL2 / CIR / P / 2019 / 94 dated August 19, 2019 read with para 2 of heading "Application for Listing" provided under Schedule XIX of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018.</p>	<p>The Company has paid the fine of Rs. 2,00,000 each to BSE and NSE.</p>	<p>Since the Company has paid the fine to both the exchanges and got the approvals for listing, we have no further comments on the same.</p>

(d) The listed entity was not required to take any actions as there was no observations made by the Practicing Company Secretary (Secretarial Auditors) in previous reports.



We further report that, pursuant to the provisions of Regulation 17(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, there shall be a maximum time gap of 120 days between two board meetings. The last board meeting of the Company during the financial year 2020-21 was held on February 11, 2021. The first Board Meeting of the financial year 2021-22 was held on June 17, 2021. The gap between these two board meetings was more than 120 days.

Also, pursuant to the provisions Regulation 33(2)(d) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the annual audited financial results shall be approved by the board of directors of the listed entity and the same shall be submitted to the recognised stock exchanges within sixty days from the end of the financial year.

However, relaxation for submitting the annual audited financial results to the recognised stock exchanges was given till June 30, 2021 vide SEBI Circular SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021. Accordingly, the Board of directors of the Company approved the audited financial results as on March 31, 2021 at the Board meeting held on June 17, 2021.

For V. SREEDHARAN & ASSOCIATES
Company Secretaries



(V. Sreedharan)
Partner
FCS: 2347; CP No. 833

Place: Bengaluru
Date: May 27, 2022
UDIN number: F002347D000408797
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