

# **Indraprastha Medical Corporation Limited**

(Indraprastha Apollo Hospitals, New Delhi - A Joint Sector Venture of Govt. of Delhi)

Regd. Office : Sarita Vihar, Delhi-Mathura Road, New Delhi-110 076 (India)

Corporate Identity Number : L24232DL1988PLC030958

Phones : 91-11-26925858, 26925801, Fax : 91-11-26823629

E-mail : imcl@apollohospitals.com, Website : apollohospdelhi.com

Ref: IMCL/CS/Regulation24A./2021

15<sup>th</sup> May, 2021

**The Manager**  
**Listing Department**  
**BSE Limited Phiroze Jeejeebhoy**  
**Towers Dalal Street, Mumbai,**  
**Maharashtra - 400001**  
**Scrip Code: 532150**

**The Manager**  
**Listing Department**  
**National Stock Exchange of India Limited**  
**Exchange Plaza, C-1, Block G,**  
**Bandra Kurla Complex, Bandra East,**  
**Mumbai, Maharashtra - 400051**  
**Symbol: INDRAMEDCO**

## **Sub: Annual Secretarial Compliance Report**

Dear Sir,

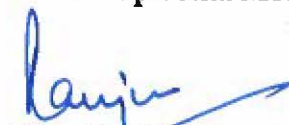
Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended), we hereby submit Annual Secretarial Compliance Report from a practicing Company Secretary, for the year ended 31<sup>st</sup> March, 2021.

This is for your information and record.

Thanking You,

Sincerely Yours,

**For Indraprastha Medical Corporation Limited**



**Priya Ranjan**  
**AVP - Corporate Affairs & Legal**  
**(Company Secretary & Compliance Officer)**





**BALDEV SINGH KASHTWAL**  
PRACTISING COMPANY SECRETARY

106, (1st Floor) Madhuban Tower, A-1, V. S. Block,  
Shakarpur Crossing, Delhi - 110 092  
Phone : 011-22444827, Mobile : 9811297944  
E-mail : bskashtwal@yahoo.co.in

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF INDRAPRASTHA MEDICAL CORPORATION LIMITED FOR THE YEAR ENDED ON 31<sup>ST</sup> MARCH, 2021**

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure requirements) Regulations, 2015]

I, CS Baldev Singh Kashtwal, Practising Company having membership Number FCS 3616 and Certificate of Practice Number 3169 have examined:-

- (a) All the documents and records made available to me and explanation provided by Indraprastha Medical Corporation Limited ("the listed entity"),
- (b) The filings / submissions made by the listed entity to the stock exchanges viz. The National Stock Exchange of India ('NSE') and the BSE Ltd. ('BSE').
- (c) Website of the listed entity : <https://delhi.apollohospitals.com/>
- (d) Other documents / filings, as the case may be relevant, which has been relied upon to make this certification,

for the year ended on 31<sup>st</sup> March, 2021 ("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 Disclosures Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosures Requirements) Regulations, 2018 (Not applicable to the Company during the period under review);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy Back of Securities) Regulations, 2018 (Not applicable to the Company during the period under review);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not applicable to the Company during the period under review);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the Company during the period under review);
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 (Not applicable to the Company during the period under review);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
- (i) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding Companies Act and dealing with client to the extent of securities issued. (Not applicable to the company during the period under review).

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- (j) Securities and Exchange Board of India (Settlement of Administrative and Civil Proceedings) Regulations, 2014. (Not applicable to the company during the period under review).
- (k) Securities and Exchange Board of India (Depository and Participants), Regulations, 2018. (to the extent applicable).
- (l) Other applicable regulations and circular / guidelines issued thereunder.

and based on the above examination, I 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 in respect of matters specified below:-

Sr. No	Compliance Requirement (Regulations / Circulars / guidelines including specific clause)	Deviations	Observations/Remarks of the Practising Company Secretary
1.	The entire Promoter / Promoter Group shareholding to be in the dematerialised form pursuant to Regulation No. 31(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Regulation No. 31(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 is not fully complied	The Govt. of NCT of Delhi is one of the promoters of the Company and is holding 23834200 Equity Shares of Rs.10/- each fully paid – up in the Company. However, these shares are yet to be dematerialised as required under Regulation 31(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
2.	Appointment of Independent Woman Director on the Board of the Company pursuant to Regulation Number 17(1)(a) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 by 31 <sup>st</sup> March, 2020.	Non – compliance of Regulation 17(1)(a) of SEBI (LODR) Regulations, 2015 during the period from 01.04.2020 to 22.05.2020.	During the period from 01.04.2020 to 22.05.2020 there was Non – compliance of Regulation 17(1)(a) of SEBI (LODR) Regulations, 2015 with respect to appointment of Independent Woman Director on the Board of the Company. However, the Company appointed an Independent Woman Director on its Board on 23.05.2020 and complied with the said regulation.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars / guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity / its promoters / directors / material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Procedures issued by SEBI through various circulars*) under the aforesaid Acts / Regulations and circulars / guidelines issued thereunder:-

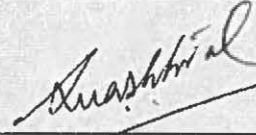
Sr. No	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations / remarks of the Practising Company Secretary, if any.
1.	NSE and BSE	Non – compliance of Regulation 17(1)(a) of SEBI (LODR) Regulations, 2015 during the period from 1 <sup>st</sup> April 2020 to 22 <sup>nd</sup> May, 2020.	NSE and BSE have imposed a fine of Rs.2,60,000/- for non-compliance of Regulation 17(1)(a) of SEBI (LODR) Regulations, 2015.	The Company has deposited the fine imposed by NSE. Application for waiver of fine is pending with BSE Ltd.

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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:-

Sr. No	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2020 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
1.	The Govt. of NCT of Delhi is one of the promoters of the Company and is holding 23834200 Equity Shares of Rs.10/- each fully paid – up in the Company. However, these shares have not yet been dematerialised.	The Govt. of NCT of Delhi is one of the promoters of the Company and is holding 23834200 Equity Shares of Rs.10/- each fully paid – up in the Company. However, these shares have not yet been dematerialised.	The Govt. Of NCT of Delhi has been requested again to get their shareholding dematerialised	There is no change in the status what was mentioned in the last report
2.	N. A.	An Independent Woman Director was not appointed by the Company, as required under Regulation 17(1)(a) of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 by 31 <sup>st</sup> March, 2020.	The Company appointed an Independent Woman Director on the Board of the company on 23.05.2020.	The company has complied with the Regulation No. 17(1)(a) of the Listing Obligations and Disclosure Requirements) Regulations, 2015

Signature :   
Name : CS BALDEV SINGH KASHTWAL  
FCS No. : 3616  
C P No. : 3169  
ICSI – UDIN : F003616C000313673



Date : May 15, 2021  
Place : Delhi