



Accredited by
Joint Commission International

Indraprastha Medical Corporation Limited

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

Corporate Identity Number : L24232DL 1988PLC030958

Phone : 26925801, 26925858 Fax: 91-11-26825601

E-mail : asinghal@apollohospitals.com Website : apollohospdelhi.com



A. K. SINGHAL

Vice President

Cum Company Secretary

Ref: IMCL/CS/Regulation24A./2020

2nd June, 2020

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 31st March, 2020.

This is for your information and record.

Thanking You,

Sincerely Yours,

A.K.SINGHAL

Encl. As above.



ANNUAL SECRETARIAL COMPLIANCE REPORT OF INDRAPRASTHA MEDICAL CORPORATION LIMITED FOR THE YEAR ENDED ON 31ST MARCH, 2020

[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.
- (c) Website of the listed entity.
- (d) Other documents / filings, as the case may be relevant, which has been relied upon to make this certification,

for the year ended on 31st March, 2020 ("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 Financial Year 2019-2020);
- (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 Financial Year 2019-2020);



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not applicable to the Company during the Financial Year 2019-2020);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the Company during the Financial Year 2019-2020);
- (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 Financial Year 2019-2020);
- (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.
- (j) 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 dematerialized 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 dematerialized 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 st March, 2020.	Regulation No. 17 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 was not fully complied	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 st March, 2020. However, as on date the Company has appointed an Independent Woman Director and the composition of the Board is in compliance with the Regulation 17 of the Sebi (Listing Obligation and Disclosure Requirements) Regulations, 2015.
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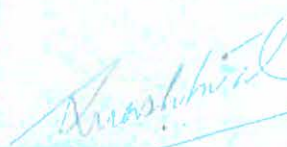
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars / guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity / its promoters / 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.
NIL				



(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 31.03.2019 (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 entire Promoter / Promoter Group shareholding to be in the dematerialized form pursuant to Regulation No. 31(2) of the SEBI (Listing Obligations and Disclosure Requirements), 2015	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 dematerialized as required under Regulation 31(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The Govt. Of NCT of Delhi has been requested again to get their shareholding dematerialized	There is no change in the status what was mentioned in the last report

Signature : 
Name : CS BALDEV SINGH KASHTWAL
FCS No. : 3616
C P No. : 3169
ICSI – UDIN : F003616B000310076



Date : June 2, 2020
Place : Delhi