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August 18, 2017

National Stock Exchange of India Limited,
Compliance Department,
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai - 400051,
Maharashtra, India.

Sub : **Clarification with respect to compliance as per Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Dear Sir/Madam,

This is with reference to your letter dated 14th August 2017 requesting us to provide explanations to the National Stock Exchange of India Limited ('NSE') on compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('SEBI LODR 2015')

In this regard we would like to clarify as below:

a. Note to "General Instructions for preparation of Balance Sheet and Statement of Profit and Loss of a Company" of Schedule III to the Companies Act, 201 states as below:

"This part of Schedule sets out the minimum requirements for disclosure on the face of the Balance Sheet, and the Statement of Profit and Loss (hereinafter referred to as "Financial Statements" for the purpose of this Schedule) and Notes. ***Line items, sub-line items and sub-totals shall be presented as an addition or substitution on the face of the Financial Statements when such presentation is relevant to an understanding of the company's financial position or performance*** *or to cater to industry/sector-specific disclosure requirements or when required for compliance with the amendments to the Companies Act or under the Accounting Standards".*

b. In line with the above guidance provided by Schedule III, HealthCare Global Enterprises Limited (the 'Company') and its subsidiaries (the 'Group') have elected to present following line items separately:
   - **Profit before other income, depreciation and amortisation, finance costs, exceptional items and tax**
   - Other income
   - **Profit before depreciation and amortisation, finance costs, exceptional items and tax**
   - Depreciation and amortization expense

HealthCare Global Enterprises Ltd. Bangalore

- **Profit before finance costs, exceptional items and tax**
- Finance costs
- **Profit before exceptional items and tax**
- Exceptional items
- **Profit before tax**
- Tax expense
- **Profit for the period/year**

The Company and the Group believe that the said presentation helps in better understanding of the Company's and Group's financial performance; and is also customary per the industry practice. The same has been followed in the 'Statement of unaudited standalone financial results' (Statement 1) and 'Statement of unaudited consolidated financial results' (Statement 2).

Also, to elaborate the choice made, the following notes are included in the Statement 1 and Statement 2 filed with the stock exchanges for the quarter ended 30 June 2017

Note 6 to Statement 1

"As permitted by Schedule III of the Companies Act, 2013, the Company has elected to present earnings before other income, depreciation and amortisation, finance costs, exceptional items and tax (EBITDA before other income) as a separate line item on the face of the statement of profit and loss in the standalone financial statements. The same classification is also followed while presenting the Statement pursuant to the requirement of the SEBI regulations. The Company has excluded other income, depreciation and amortisation expense, finance costs, exceptional items, tax expense, other comprehensive income for the above presentation"

Note 6 to Statement 2

"As permitted by Schedule III of the Companies Act, 2013, the Group has elected to present earnings before other income, depreciation and amortisation, finance costs, exceptional items and tax (EBITDA before other income) as a separate line item on the face of the statement of profit and loss in the consolidated financial statements. The same classification is also followed while presenting the Statement pursuant to the requirement of the SEBI regulations. The Group has excluded other income, depreciation and amortisation expense, finance costs, exceptional items, tax expense, other comprehensive income, share of total comprehensive income to non-controlling interests for the above presentation"

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Request you to take the above explanations on record and confirm.

For HealthCare Global Enterprises Limited

HealthCare Global Enterprises Ltd. Bangalore

Sunu Manuel
Company Secretary and Compliance Officer