December 21, 2020

To

National Stock Exchange of India Limited,
Compliance Department,
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai – 400 051,
Maharashtra, India

To

BSE Limited,
Compliance Department,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001,
Maharashtra, India

Subject: Report on violation of code of conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Reference: SEBI Gazette Notification No SEBI/LAD-NRO/GN/2020/23 dated July 17, 2020 read with SEBI Circular No SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020

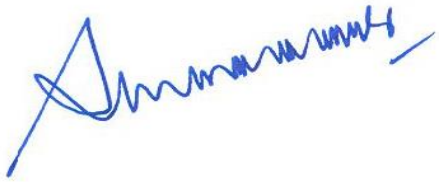
Dear Sir/Madam,

With reference to the captioned subject, please find enclosed a report on violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Kindly take this on record.

Thanking you,

For HealthCare Global Enterprises Limited



Sunu Manuel
Company Secretary & Compliance Officer

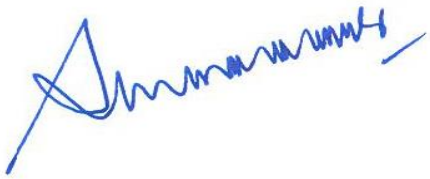
Enclosure: as above

Report by HealthCare Global Enterprises Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Sl. No	Particulars	Details
1	Name of the listed Company ~~/ Intermediary / Fiduciary~~	HealthCare Global Enterprises Limited
2	Please tick appropriate checkbox ☐ Listed Company ☐ Intermediary ☐ Fiduciary	Listed Company
3	**A. Details pf Designated Person (DP)**	
	i. Name of the DP	Bharatsinh S Gadhavi
	ii. PAN of DP	ACQPG9554R
	iii. Designation of DP	Regional Director
	iv. Functional Role of DP	Business Operations
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Not applicable
	ii. PAN of the immediate relative of DP	Not applicable
	C. Details of transaction (s)	
	i. Name of the script	NSE: HCG BSE:539787
	ii. No of shares traded and value (Rs.) (Date-wise)	Purchased 8,271 Equity Shares of HealthCare Global Enterprises Limited from 01/12/2020 to 11/12/2020 (Please refer to Annexure 1 for the details)
	D. In case value of trade(s) is more than Rs. 10 lacs in a calendar quarter	
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	21 December 2020
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	21 December 2020
4	Details of violations observed under Code of Conduct	(i) Delay in reporting purchase of shares to the Company under Regulation 7 SEBI (Prohibition of Insider Trading) Regulations, 2015. (ii) Purchased 8,271 shares as against the pre-clearance approval which was provided for 8,000 shares at an estimated price of INR 155 per share, aggregating to INR 12,40,000.

5	Action taken by Listed Company/Intermediary/Fiduciary	The Company has issued a warning letter to Bharatsinh S Gadhavi, for violations provided above.
6	Reasons recorded in writing for taking action stated above	Considering the fact that Bharatsinh S Gadhavi had no previous instances of violations under the Code of Conduct, and the delay was unintentional, the Company felt that it is appropriate to issue a warning letter, as this is the first instance.
7	Details of the previous instances of violations, if any, since last financial year	None
8	**If any amount collected for Code of Conduct violation(s) :** Not applicable	
	i. Mode of transfer to SEBI –IEPF (Online/Demand Draft): Not applicable	
	ii. Details of transfer/payment: Not applicable In case of Online: Particulars / Details Name of the transferor Bank Name, Branch and Account Number UTR/ Transaction reference Number Transaction Date Transaction Amount (in Rs.) In case of Demand Draft (DD): Particulars / Details Bank Name and Branch DD Number DD Date DD Amount (in Rs)	
9	Any other relevant information: None	

Yours faithfully,



Sunu Manuel
PAN: ANMPM3149B
Email ID: sunumanuel@hcgel.com

December 21, 2020
Bangalore

Annexure 1

Details of Equity Shares Purchased						
Sl. No.	**Date of Purchase**	**Name of Purchaser**	**BSE/NSE**	**Quantity of shares**	**Price Per Share (INR)**	**Total Cost (INR)**
1	01-12-2020	Bharatsinh S Gadhavi	NSE	1000	150.04	1,50,040.00
2	02-12-2020	Bharatsinh S Gadhavi	NSE	271	149.67	40,560.57
3	03-12-2020	Bharatsinh S Gadhavi	NSE	2000	153.69	3,07,380.00
4	03-12-2020	Bharatsinh S Gadhavi	BSE	1000	153.19	1,53,190.00
5	04-12-2020	Bharatsinh S Gadhavi	NSE	2000	148.35	2,96,700.00
6	08-12-2020	Bharatsinh S Gadhavi	NSE	1000	147.06	1,47,060.00
7	11-12-2020	Bharatsinh S Gadhavi	NSE	1000	160.43	1,60,430.00
Total				**8,271**		**12,55,360.57**